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February 13, 2019 revised to February 25, 2019

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency - Region I
5 Post Office Square - Suite 100 (ORC04-6)
Boston, MA 02109-3912
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Dear Ms. Santiago:

Please find enclosed for docketing and filing, Respondent Southcoast Plating's Motion to Extend Time to Answer.

Thank you for your attention to this matter.

Sincerely,
Jamy Buchanan Madeja, Esq.

Enclosures

Cc: Carlton Neves, Southcoast Plating Inc., d.b.a. Star Plating Co.
Marilyn Costa, Southcoast Plating Inc., d.b.a. Star Plating Co.
John Hultgren, Senior Enforcement Counsel, EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

In the Matter of:)
)
Southcoast Plating, Inc.) Docket Number: RCRA-01-2018-0036
41 Coffin Street)
New Bedford, MA 02746)
_____)

CONSENTED TO MOTION TO EXTEND TIME FOR FINANCIAL INABILITY TO PAY

Respondent, Southcoast Plating, Inc. d.b.a. Star Plating Company, hereby moves pursuant to 40 C.F.R. §§ 22.7(b) and 22.16(a) for an additional extension of time to file an answer and a written request for a hearing in this matter. The parties calculate that such filing presently was due by February 22, 2019. Illness of counsel caused this extension to be filed today rather than previously.

As grounds for this motion, Respondent states that counsel for Respondent and counsel for the U.S. EPA have been in diligent settlement discussions, including Respondent's submission and U.S. EPA's evaluation of financial documents regarding Respondent's ability to pay. On February 13, 2019, EPA counsel presented its ability to pay analysis to Respondent's counsel. Additional time is necessary because EPA counsel will be away from the office during the week of February 18, 2019, Respondent plans to submit additional financial information, the parties plan to convene an additional conference call regarding EPA's ability to pay analysis involving Star Plating's accountant and/or pension plan administrator and EPA's financial analyst, and the parties plan to continue discussions to reach terms of settlement.

Wherefore, Southcoast Plating, Inc. respectfully requests a CONSENTED –TO extension to
March 29, 2019.

Respectfully submitted,

Southcoast Plating, Inc. d.b.a. Star Plating Company
Respondent
By its attorney,



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CERTIFICATE OF SERVICE

I, Jamy Buchanan Madeja, hereby certify that on January __, 2019, I served a copy of the foregoing by electronic mail to the following:

John Hultgren
Senior Enforcement Counsel
Office of Environmental Stewardship
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