

BY ELECTRONIC MAIL

November 28, 2018

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency - Region I
5 Post Office Square - Suite 100 (ORC04-6)
Boston, MA 02109-3912
R1_Hearing_Clerk_Filings@epa.gov

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)
_____)

MOTION TO EXTEND TIME FOR FINANCIAL INABILITY TO PAY

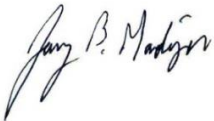
Respondent, Southcoast Plating, Inc. d.b.a. Star Plating Company, hereby moves pursuant to 40 C.F.R. §§ 22.7(b) and 22.16(a) for an extension of time to file an answer and a written request for a hearing in this matter. The parties calculate that such filing presently is due on December 5, 2018.

As grounds for this motion, Respondent states that counsel for Respondent and U.S. Environmental Protection Agency counsel have been in diligent settlement discussions, which now include review of financial documents regarding Respondent's Inability to Pay the proposed penalty associated with this action. Counsel for EPA informed counsel for Respondent that the aforementioned Ability to Pay documentation will take multiple weeks for analysis. EPA counsel has suggested that a 5-week extension is appropriate given this review process and the upcoming holidays.

Wherefore, Southcoast Plating, Inc. respectfully requests a 5 week extension to January 11, 2018, to file its answer or a proposed settlement.

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 November 28, 2018, 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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