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REGIONAL HEARINGS
OFFICE

2019 NOV 27 PM 1:42

U.S. Environmental
Protection Agency-Reg 2

November 22, 2019

Ms. Karen Maples
Regional Hearing Clerk
U.S. Environmental Protection Agency
290 Broadway, 16th Floor
New York, New York 10007-1866

RE: **NOTICE OF PROPOSED ASSESSMENT OF CIVIL PENALTY**
CAMIONEROS DE VOLTEO DE PR, INC.
DOCKET NUMBER CWA-02-2019-3352
LOMAS VISTA SOIL EXTRACTION
NPDES ID: PRU549874

Dear Ms. Maples:

Please find enclosed a Consented-To Motion for Thirty Days Extension of Time prepared on behalf of Camioneros de Volteo de PR, Inc., in the above referenced matter. Today I spoke with Attorney Carolina Jordán-García and discussed the need for an extension of time. Ms. Jordán-García verbally consented to the extension of time.

Please let me know if you have any questions.

Cordially,



Fernando Molini-Vizcarrondo

c: Atty. Carolina Jordán-García

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY, 16TH FLOOR
NEW YORK, NEW YORK 1007-1866**

REGIONAL HEARING
CLERK
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U.S. Environmental
Protection Agency-Reg 2

IN THE MATTER OF:	* DOCKET NO. CWA-02-2019-3352
	*
CAMIONEROS DE VOLTEO DE PR	*
HC 20 PO BOX 10997	* Proceeding pursuant to Section
GURABO, PR 00777	* 309(g) of the Clean Water Act,
	* 33 U.S.C. §1319(g). to assess a
Lomas Vista Soil Extraction	* Class II Civil Penalty
Gurabo, PR	*
	*
RESPONDENT	*

CONSENTED-TO MOTION FOR THIRTY DAYS EXTENSION OF TIME

Respondent Camioneros de Volteo de PR, Inc. ("Respondent"), by and through the undersigned counsel, moves for an extension of time to file an answer or otherwise to respond to the Administrative Complaint, Findings of Violation and Notice of Proposed Assessment of an Administrative Penalty, in the above-referenced matter pursuant to Rule 22.7 of the Consolidated Rules of Practice Governing the Administrative Assessment and Civil Penalties.

Counsel for Respondent has communicated with Counsel for Complaint U.S. Environmental Protection Agency, Carolina Jordán-García, and has obtained consent for the requested extension of time from the present deadline to answer the Complaint. In support of this motion, Respondent states the following:

1. It is in the best interest of the parties and the process to: (a) avoid the likely unnecessary expense to Respondent of having to prepare and Answer to the Complaint; (b) devote the parties' resources toward a

CERTIFICATE OF SERVICE

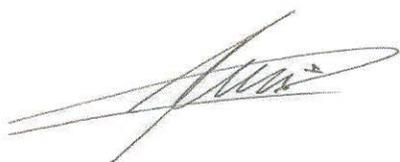
I certify that I have this day caused to be sent the foregoing **CONSENTED-TO MOTION FOR THIRTY DAYS EXTENSION OF TIME**, dated November 22, 2019, and bearing the above-reference docket number, in the following manner to the respective addressee below:

CONSENTED-TO MOTION FOR THIRTY DAYS EXTENSION OF TIME sent by U.S. Mail to:

Karen Maples
Regional Hearing Clerk
U.S. Environmental Protection Agency
Region 2
290 Broadway, 16th Floor
New York, New York 10007-1866

By email to:

Carolina Jordán-García
Office of Regional Counsel
U.S. Environmental Protection Agency
City View Plaza II, Suite 7000
#48, Road 165, Km. 1.2
Guaynabo, PR 00968-8069
jordan-garcia.carolina@epa.gov



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Date: November 22, 2019