

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

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In the Matter of :
 :
Rome Gas Inc., : Docket No. RCRA-02-2017-7504
 :
Respondent. :
 :
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2017 OCT 26 11 28 AM
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 2

MOTION FOR EXTENSION OF TIME TO FILE AN ANSWER

Pursuant to Sections 22.7 and 22.16 of Title 40 of the Code of Federal Regulations, Respondent and Complainant jointly request a 30-day extension of time to file an Answer to the Complaint in the above-captioned matter through and including December 5, 2017.

The Complaint was filed on September 29, 2005 and received by Respondent on October 6, 2017, thus the Answer is due on November 6, 2005. Respondent would like the opportunity to present additional documentation and evidence that may address the allegations in the Complaint. Respondent and Complainant are scheduled to meet in November for a document review session. The parties therefore jointly request a 30-day extension of time to Answer.

Respectfully submitted,



Karen L. Taylor, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th floor
New York, NY 10007-1866
phone: (212) 637-3637

Dated: October 26, 2017

In the Matter of Rome Gas Inc.
Docket No. RCRA-02-2017-7504

CERTIFICATE OF SERVICE

I certify that I have this day caused to be sent the foregoing MOTION FOR EXTENSION OF TIME TO FILE AN ANSWER, bearing the above-referenced docket number, in the following manner to the respective addressees below:

Original and One Copy
by Hand:

Office of Regional Hearing Clerk
U.S. Environmental Protection
Agency - Region 2
290 Broadway, 16th floor
New York, NY 10007-1866

Copy
by Hand:

Helen S. Ferrara
Regional Judicial Officer
U.S. Environmental Protection
Agency - Region 2
290 Broadway, 16th floor
New York, NY 10007-1866

Copy by
First Class Mail:

John Tal
Vice President
Rome Gas Inc.
114 Danberry Circle
New Hartford, NY

Dated: **OCT 26 2017**

New York, NY

