

BY ELECTRONIC MAIL

October 23, 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. Southcoast Plating, Inc. calculates that such filing presently is due on or about October 24, 2018.

As grounds for this motion, Respondent states that counsel for Southcoast Plating, Inc. and counsel for EPA have communicated electronically and telephonically their mutual intent to resolve this matter in the form of a written consent agreement for approval by final order of the Regional Judicial Officer pursuant to 40 C.F.R. §§ 22.18(b)(2) and 22.18(b)(3).

Respondent is in the process of hiring a financial analyst to complete an assessment of Southcoast Plating Inc.'s Financial Inability to Pay. Given the nature of this assessment, and accounting for the Thanksgiving holiday, Respondent believes an extension of 6 weeks rather than the usual 30-day extension would be appropriate. EPA counsel has indicated that the Agency is amenable to this extension request.

Wherefore, Southcoast Plating, Inc. respectfully requests a 6 week extension to December 5, 2018, to file its answer.

Respectfully submitted,

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



Jamy Buchanan Madeja, Esq. (BBO # 552536)  
Buchanan & Associates  
100 Cambridge Street, 14<sup>th</sup> Floor

Boston, MA 02114

T: (617) 227-8410

[jmadeja@buchananassociates.com](mailto:jmadeja@buchananassociates.com)

CERTIFICATE OF SERVICE

I, Jamy Buchanan Madeja, hereby certify that on October 23, 2018, I served a copy of the foregoing by electronic mail to the following:

John Hultgren  
Senior Enforcement Counsel  
Office of Environmental Stewardship  
U.S. Environmental Protection Agency – Region I  
5 Post Office Square - Suite 100 (OES04-2)  
Boston, MA 02109-3912  
hultgren.john@epa.gov

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