

BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

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In The Matter of )  
)  
WCS Construction, LLC )  
William C. Smith & Co., and )  
880 New Jersey Avenue, LLC, ) Proceeding to Assess Class II Penalty  
1100 New Jersey Avenue, SE ) Under Section 309(g) of the Clean Water  
Suite 1000 ) Act, 33 U.S.C. § 1319(g)  
Washington, D.C. 20003, )  
)  
Respondents. ) Docket No.: CWA-03-2015-0112  
)  
Property Located at: )  
880 New Jersey Avenue, SE )  
Washington, D.C. 20003 )  
\_\_\_\_\_ )

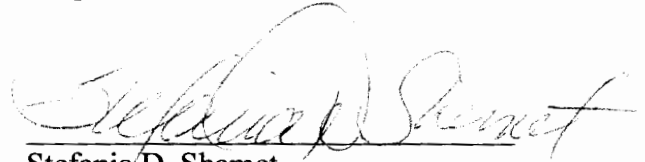
**RESPONSE TO CONSENT MOTION OF RESPONDENTS TO  
EXTEND TIME TO FILE ANSWER AND REQUEST FOR HEARING**

Complainant, through counsel, hereby responds to the Consent Motion of Respondents to Extend Time to File Answer and Request for Hearing (Motion). As set forth in the Motion, Respondents have consulted with counsel for Complainant and Complainant consents to the Motion.

Respectfully submitted,

Date: \_\_\_\_\_

4/29/15



Stefania D. Shamet  
Senior Assistant Regional Counsel  
U.S. Environmental Protection Agency  
Region III  
1650 Arch Street (MC 3RC20)  
Philadelphia, Pennsylvania 19103  
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CERTIFICATE OF SERVICE

I hereby certify that on this date I caused the foregoing Response to Consent Motion of Respondents to Extend the Time to File Answer and Request for Hearing in *In re WCS Construction, LLC, William C. Smith & Company, and 880 New Jersey Avenue, LLC* Docket No. CWA-03-2015-0112 to be served in the following manner:

By Hand (Original and one copy):

Regional Hearing Clerk  
U.S. Environmental Protection Agency  
Region III 3RC00  
1650 Arch Street  
Philadelphia, PA, 19103

By Electronic Mail & First Class Mail

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Sonia Tabriz, Esquire  
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The Executive Building  
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Washington, DC 20005  
COUNSEL FOR RESPONDENTS

Dated: 4/29/15

  
Stefania D. Shamet