

# SIDLEY

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December 19, 2019

## By Overnight Delivery and Email

Helen S. Ferrara  
Regional Judicial Officer  
United States Environmental Protection Agency  
Region 2  
290 Broadway  
16th Floor  
New York, New York 10007-1866

Re: In the Matter of Country Life LLC  
Docket No.: RCRA-02-2019-7107  
Request for Extension for Filing Answer

Dear Ms. Ferrara:

Sidley Austin LLP is legal counsel for Country Life LLC (“Country Life”) in the above-referenced matter (“RCRA Matter”). Country Life’s Answer to the Complaint is due December 23, 2019. I have sent Mr. Carl Howard, USEPA Assistant Regional Counsel, a courtesy copy of the Answer and spoken with him about scheduling an informal settlement conference to attempt to resolve the RCRA Matter. Mr. Howard is amenable to scheduling a conference. To allow adequate time for such conference, Country Life requests an extension until February 23, 2020 (*i.e.*, 60 days) of the deadline for filing the Answer to the Complaint. Mr. Howard does not object. The purpose of the extension is to give the parties a reasonable time to conduct settlement.

We understand you are currently out of the office. Mr. Howard and I both interpret your out-of-office message (enclosed) to mean that an uncontested reasonable request for an extension such as this will be granted upon your return and that it will be effective upon the date it is made.

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Ms. Helen Ferrara  
Page 2

Thank you for your attention to this matter.

Very truly yours,



Maureen M. Crough  
Counsel

MMC:

cc: Karen Maples (by overnight delivery)  
Regional Hearing Clerk  
United States Environmental Protection Agency  
Region 2  
290 Broadway, 16th Floor  
New York, New York 10007-1866

Carl R. Howard, Esq. (by email and overnight delivery)  
Assistant Regional Counsel  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 2  
290 Broadway  
New York, New York 10007-1866

## Crough, Maureen M.

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**From:** Howard, Carl <Howard.Carl@epa.gov>  
**Sent:** Thursday, December 19, 2019 5:07 PM  
**To:** Crough, Maureen M.  
**Subject:** FW: Document Review and Ratification during RJO's Leave

Re – Country Life

**From:** Ferrara, Helen <Ferrara.Helen@epa.gov>  
**Sent:** Wednesday, December 18, 2019 11:07 AM  
**To:** R2 ORC (Everyone) <R2\_ORC\_Everyone@epa.gov>  
**Subject:** FW: Document Review and Ratification during RJO's Leave

Good morning -

I will be out of the office from December 20th through January 6th. If you will be preparing any CAFOs or ESAs for ratification between these dates, please prepare them for the RA's signature.

Upon my return to the office, any orders which I issue granting requests, made during my absence, for extensions of time will be effective as of the date the request was made.

If you would like any documents reviewed upon my return, please remember to follow the procedures outlined in my message, below.

Thank you, and Happy Holidays!

Helen Ferrara

**From:** Ferrara, Helen  
**Sent:** Wednesday, June 27, 2018 11:12 AM  
**To:** R2 ORC (NY) <R2\_ORC\_NY@epa.gov>; R2 ORC (PR) <R2\_ORC\_PR@epa.gov>; Rivera-Ocasio, Evelyn <Rivera-Ocasio.Evelyn@epa.gov>; Schaaf, Eric <Schaaf.Eric@epa.gov>; Simon, Paul <Simon.Paul@epa.gov>  
**Subject:** Submission of Documents to the RJO

Good morning –

In order to expedite the processing of documents that require RJO review, I am requesting that the following procedures be followed:

-All Consent Agreement and Final Orders, Expedited Settlement Agreements, and any motions or other documents you have prepared for my review and/or signature should be placed in the RJO Inbox adjacent to the RHC Inbox on the ledge in front of the WGL Inboxes;

-Scan and email to me the signed document before placing it in the RJO inbox.

Please contact me with any questions or concerns at (212) 637-3233 or [ferrara.helen@epa.gov](mailto:ferrara.helen@epa.gov).

Thank you,

Helen Ferrara

Regional Judicial Officer