

Ballard Spahr LLP

1735 Market Street, 51st Floor
Philadelphia, PA 19103-7599
TEL 215.665.8500
FAX 215.864.8999
www.ballardspahr.com

Ronald M. Varnum
Tel: 215.864.8416
Fax: 215.864.8999
varnumr@ballardspahr.com

June 20, 2017

By Federal Express

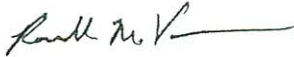
Helen Ferrara
Regional Judicial Officer
U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866

Re: In the Matter of Lourdes Health System, Docket No. RCRA-02-2017-7103

Dear Ms. Ferrara:

This firm represents Respondent Lourdes Health System in the above-captioned matter. Enclosed please find an original and one copy of Lourdes' Second Motion for Extension of Time to Answer Complaint, Compliance Order and Notice of Opportunity for Hearing, submitted on behalf of Lourdes Health System.

Respectfully submitted,



Ronald M. Varnum

RMV/rhr
Enclosures

cc: Stuart Keith, Esq., Assistant Regional Counsel (via Federal Express)
Karen Maples, Regional Hearing Clerk (via Federal Express) ✓

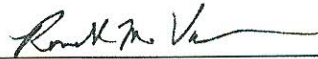
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focus on finalizing and executing the agreement, without Lourdes incurring unnecessary time and expense associated with responding to the Complaint that would otherwise detract from those efforts.

5. Counsel for Lourdes has conferred counsel for EPA regarding this request, and counsel for EPA has indicated that EPA consents to Lourdes's request for extension until July 26, 2017.

WHEREFORE, Lourdes respectfully requests that the deadline to file an answer to the Complaint and request for a hearing on the Complaint, including on the Compliance Order and the proposed civil penalty contained in the Complaint, be extended by 30 days until July 26, 2017.

Respectfully submitted,



Harry Weiss
Ronald M. Varnum
BALLARD SPAHR LLP
1735 Market Street, 51st Floor
Philadelphia, Pennsylvania 19103-7599
215-665-8500

*Attorneys for Respondent
Lourdes Health System*

Dated: June 20, 2017

CERTIFICATE OF SERVICE

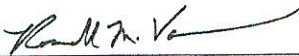
I hereby certify that on June 20, 2017, I caused the original and one copy of the foregoing Second Motion for Extension of Time to Answer, Complaint, Compliance Order and Notice of Opportunity for Hearing to be sent by Federal Express to the following:

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

I hereby certify that a true and correct copy of the Motion was also sent by Federal Express to:

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

Stuart Keith, Esq.
Assistant Regional Counsel
U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866



Ronald M. Varnum