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Office of Regional Hearing Clerk

March 14, 2018

BY ELECTRONIC MAIL

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency
Region 1 (ORC 04-6)
5 Post Office Square – Suite 100
Boston, Massachusetts 02109-3912

Ann M. Sobolewski
617-973-6120
617-722-4921 FAX
asobolewski@pbi.com

Re: In the Matter of GVS North America, Inc.
RCRA-01-2017-0053

Dear Ms. Rivera:

Enclosed please find the following documents for filing in the above-referenced matter:

1. Motion For Further Extension Of Time In Which To Answer The Administrative Complaint;
2. Proposed Order; and
3. Certificate of Service.

Thank you for your attention to this matter. Should you have any questions please contact me.

Very truly yours,



Ann M. Sobolewski

Enclosure

cc: Kathleen Woodward, Esq. (by electronic mail)
Keith Lindquist (by electronic mail)

2460125v1/20488-5

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1**

In the Matter of:

GVS North America, Inc.
63 Community Drive
Sanford, ME 04073

EPA ID No. MED980914451

Respondent

Docket No. RCRA-01-2017-0053

**MOTION FOR FURTHER EXTENSION
OF TIME IN WHICH TO ANSWER
THE ADMINISTRATIVE COMPLAINT**

Proceeding Under Section 3008(a) of the
Resource Conservation and Recovery Act,
42 U.S.C. §6928(a)

**MOTION FOR FURTHER EXTENSION OF TIME
IN WHICH TO ANSWER THE ADMINISTRATIVE COMPLAINT**

I. NEED FOR AN EXTENSION

Since GVS North America, Inc.'s ("Respondent") receipt of the Administrative Complaint and Notice of Opportunity to Request a Hearing in the above-captioned matter, it has provided information to and participated in a settlement meeting with EPA Senior Enforcement Counsel Kathleen Woodward. Settlement discussions have proceeded, including discussion of a Supplemental Environmental Project ("SEP"). While the full scope of the SEP has been proposed, the settlement has not yet been finalized.. For that reason, Respondent requests an additional fourteen (14) day extension of the deadline for filing an answer to the Complaint.

This extension is necessary in order to allow further substantive settlement discussions. It would impose an unnecessary burden on the Respondent to require preparation of an answer to the Complaint if, as appears possible, settlement of this matter and full compliance with the relevant regulations can be achieved without having to do so. The requested fourteen (14) day extension should provide sufficient time to complete these settlement discussions.

Attorney Woodward has indicated that she has no objection to this request for an

extension of time to answer the Complaint until March 30, 2018.

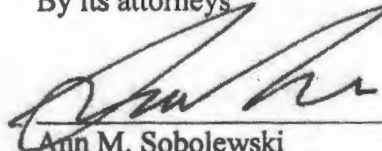
II. AUTHORITY TO GRANT AN EXTENSION

The Presiding Officer may grant an extension of time for filing any document, including a written answer to an administrative complaint, upon timely motion of a party to the proceeding, for good cause shown, and after consideration of prejudice to other parties, under the Consolidated Rules of Practice, 40 C.F.R. § 22.7(b). This motion is made sufficiently in advance of the extended due date of March 16, 2018, is intended to allow all parties to pursue settlement of this matter at an early stage of these proceedings and is not opposed by the EPA. For these reasons, Respondent's request complies with the requirements of 40 C.F.R. §22.7.

III. REQUEST FOR EXTENSION

There is no prejudice to any other party and there is good cause for an extension of time in which to file an answer to the Complaint. Therefore, the Respondent respectfully requests that the time for filing an answer to the Complaint be extended to March 30, 2018.

Respectfully Submitted,
GVS North America, Inc.
By its attorneys



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

In the Matter of:

GVS North America, Inc.
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EPA ID No. MED980914451

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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing MOTION FOR FURTHER EXTENSION OF TIME IN WHICH TO ANSWER THE ADMINISTRATIVE COMPLAINT in the above-captioned matter were sent to the following persons in the manner indicated on March 14, 2018:

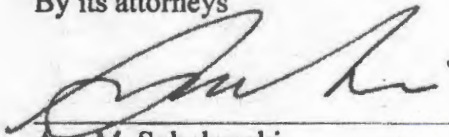
Via Email pursuant to Standing Order Authorizing Filing and Service By E-Mail In Proceedings Before the Region 1 Regional Judicial Officer (October 9, 2014):

Wanda Santiago, Regional Hearing Clerk U.S. EPA Region 1
R1 Hearing Clerk Filings@epa.gov

Copy by email:

Kathleen E. Woodward, Senior Enforcement Counsel Woodward.Kathleen@epa.gov

Respectfully Submitted,
GVS North America, Inc.
By its attorneys



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