

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2**

-----X  
In the Matter of :  
 :  
Rome Gas Inc., : Docket No. RCRA-02-2017-7504  
 :  
Respondent. :  
-----X

MOTION FOR EXTENSION OF TIME TO FILE AN ANSWER

Pursuant to Sections 22.7 and 22.16 of Title 40 of the Code of Federal Regulations, Respondent and Complainant jointly request a 45-day extension of time to file an Answer to the Complaint in the above-captioned matter through and including January 19, 2018.

The Complaint was filed on September 29, 2017 and received by Respondent on October 6, 2017, thus the Answer was due on November 6, 2017. Respondent requested time and the opportunity to present additional evidence related to allegations in the Complaint. On October 31, 2017, an extension of time to Answer was granted through and including December 5, 2017. On November 16, 2017, Respondent provided documentation to address some of the allegations in the Complaint. Respondent and Complainant met on November 30, 2017 at which time Respondent provided more data. Respondent would like the opportunity have its contractor research its files and provide additional documentary evidence. Respondent and Complainant anticipate that the upcoming holidays will cause some delays due to vacation schedules. The parties therefore jointly request a 45-day extension of time to Answer.

Respectfully submitted,

  
\_\_\_\_\_  
Karen L. Taylor, Esq.  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 2  
290 Broadway, 16<sup>th</sup> floor  
New York, NY 10007-1866  
phone: (212) 637-3637

Dated: December 5, 2017

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2017 DEC 5 10 10 AM

**In the Matter of Rome Gas Inc.**  
**Docket No. RCRA-02-2017-7504**

**CERTIFICATE OF SERVICE**

I certify that I have this day caused to be sent the foregoing MOTION FOR EXTENSION OF TIME TO FILE AN ANSWER, bearing the above-referenced docket number, in the following manner to the respective addressees below:

Original and One Copy  
by Hand:

Office of Regional Hearing Clerk  
U.S. Environmental Protection  
Agency - Region 2  
290 Broadway, 16<sup>th</sup> floor  
New York, NY 10007-1866

Copy  
by Hand:

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

Copy by  
First Class Mail:

John Tal  
Vice President  
Rome Gas Inc.  
114 Danberry Circle  
New Hartford, NY 13413

Dated: December 7, 2017  
New York, NY

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