

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG.II
2007 SEP 25 AM 11:08
REGIONAL HEARING
CLERK

IN RE:

Commonwealth of Puerto Rico
Department of Housing

Fullana Heavy Works

RESPONDENTS

DOCKET NO. CAA-02-2007-1214

MOTION FOR EXTENSION OF TIME TO ANSWER COMPLAINT

Pursuant to Section 22.7(b) of the "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination or Suspension of Permits" 40 C.F.R. Part 22 ("Rules of Practice"), Fullana Heavy Works respectfully requests for an extension of thirty (30) days in which to file an answer to the Environmental Protection Agency's Complaint.

On August 17, 2007, the United States Environmental Protection Agency issued a "Complaint and Notice of Opportunity to Request a Hearing" ("Complaint") against the Respondent, Fullana Heavy Works ("FHW" or "Respondent").

On August 21, 2007, FHW received by certified mail the Complaint. In accordance with the Section 22.15(a) of the Rules of Practice, within thirty (30) days of the Respondent's receipt of the Complaint, FHW is required to file an answer to the same if it

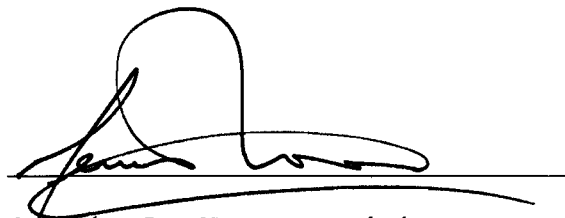
wishes to request for a hearing; contest any material facts set forth in the Complaint; contend that the amount of the penalty proposed is inappropriate; and/or to seek a judgment with respect to the law applicable to the matter. Accordingly, Respondent has until the 20th of September of 2007 to file an answer and request for a hearing.

On September 17, 2007, FHW acquired the legal services of the subscribing attorney, only four days before the filing date provided. Counsel has thus been unable to fully develop, in conjunction with the Respondent, the factual information necessary to frame a truthful Answer to the Complaint, considering also the substantial amount of time that has passed since the date of the alleged violations (December 13, 2005).

Based on the foregoing FHW respectfully requests a time extension of thirty (30) days, until October 20, 2007, to properly answer or otherwise respond to the Complaint.

Dated this 19th day of September, 2007.

Respectfully submitted,



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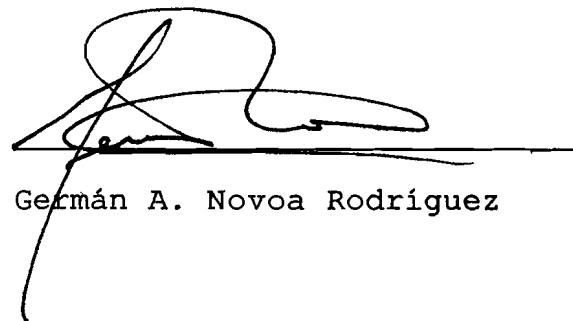
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I HEREBY CERTIFY that on this 19th day of September, 2007, I caused a true and correct copy of the above and foregoing document to be served by facsimile on the following:

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