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November 21, 2013

Via Overnight Mail

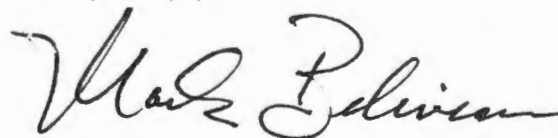
Wanda I. Santiago, Regional Hearing Clerk
U.S. Environmental Protection Agency Region I
5 Post Office Square, Suite 100
Mail Code: ORA18-1
Boston, MA 02109-3912

Re: Aero Dynamics, Inc.
Docket No. RCRA-01-2013-0056

Dear Ms. Santiago:

Enclosed for filing are the original and one copy of my Motion to Extend Time to Respond to Administrative Complaint, Compliance Order and Notice of Opportunity for Hearing in the above-captioned matter.

Very truly yours,



Mark E. Beliveau

MEB/adm
Encl.

cc: Christine M. Foot, Esq.
Gregory Burzynski

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

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EPA Docket No.
RCRA-01-2013-0056
EPA ORC
OFFICE OF
REGIONAL HEARING COUNSEL

_____)
IN THE MATTER OF:)
)
)
)
Aero-Dynamics, Inc.)
142 Batchelder Road)
Seabrook, New Hampshire 03874)
)
Respondent.)
)
Proceeding under Section 3008(a) of the)
Resource Conservation Recovery Act,)
42 U.S.C. §6928(a))
_____)

Administrative Complaint
Compliance Order and
Notice of Opportunity for
Hearing

**MOTION TO EXTEND TIME TO RESPOND TO
ADMINISTRATIVE COMPLAINT, COMPLIANCE ORDER
AND NOTICE OF OPPORTUNITY FOR HEARING
WITH CONSENT OF EPA ENFORCEMENT COUNSEL**

NOW COMES AERO-DYNAMICS, INC., Respondent, by and through its attorneys,
Pierce Atwood LLP, and requests an extension of the deadline for Respondent to file an Answer
to the Complaint to January 15, 2014, and in support thereof states as follows:

1. Immediately after being served the Administrative Complaint, Compliance Order and
Notice of Opportunity for Hearing, the United States Government was closed and
Enforcement Counsel was unable to discuss this case with Respondent for more than
two weeks.
2. The day after the United States Government re-opened, Respondent and Enforcement
Counsel spoke by telephone and scheduled an informal settlement conference in
Boston for October 31, 2013.

3. On October 31, 2013 Respondent, its legal counsel and EPA Enforcement Counsel participated in an informal settlement conference in Boston.
4. All parties agree that the informal settlement conference was productive and the Respondent is in the process of providing additional information based on discussions held on October 31, 2013.
5. In addition, Respondent may submit an inability to pay request in accordance with the RCRA Civil Penalty Policy and the inability to pay document request list provided by EPA Region I and additional time is needed to explore, investigate and collect the information needed to make such a decision.
6. Due to the coming holiday period and limited availability of all parties, a new deadline of January 15, 2014, to file an Answer to the Complaint is requested.
7. EPA Enforcement Counsel consents to this request for a new deadline of January 15, 2014, for Respondent to file an Answer to the Complaint.

WHEREFORE, Respondent respectfully requests that the time to file an Answer to the Complaint be extended until the close of business on Wednesday, January 15, 2014.

Respectfully submitted,

Aero-Dynamics, Inc.

By its attorneys,
Pierce Atwood LLP



Mark E. Beliveau, NH Bar No. 301
One New Hampshire Avenue
Suite 350
Portsmouth, New Hampshire
Tel. (603) 373-2002

Dated: November 21, 2013

Certificate of Service

I, Mark E. Beliveau, Esquire hereby certify that on this 21 day of November 2013, I have caused a true copy of the foregoing to be served by first-class mail, postage prepaid, to:

Christine M. Foot, Esquire, Enforcement Counsel
U.S. Environmental Protection Agency Region I
5 Post Office Square, Suite 100
Mail Code: OES04-2
Boston, MA 02109-3912


Mark E. Beliveau, Esquire