

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2**

April 16, 2024 @ 3:59 pm
USEPA – Region II
Regional Hearing Clerk

In the Matter of:

HÉCTOR RODRÍGUEZ VALLE
P.O. Box 1239
Hormigueros, Puerto Rico 00660

and

TRANSPORTE RODRIGUEZ ASFALTO,
INC. ("TRA")
P. O. Box 1239
Hormigueros, Puerto Rico 00660

TRA RECYCLING PLANT CONSTRUCTION
PROJECT
PR-419 Road, Km. 11.05
Intersection with Road PR-2, Km. 139.7
Cerro Gordo Ward, Aguada, Puerto Rico

RESPONDENTS

DOCKET NUMBER CWA-02-2024-3451

Proceeding pursuant to Section
309(g)(2)(B) of the Clean Water Act, 33
U.S.C. § 1319(g)(2)(B), to assess a Class
II Civil Penalty

**RESPONDENT TRA'S MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO
COMPLAINT**

TO THE HONORABLE REGIONAL JUDICIAL OFFICER:

COMES NOW Respondent TRANSPORTE RODRIGUEZ ASFALTO, INC. ("TRA"), through the undersigned counsel, and respectfully sets forth and prays as follows:

1. Respondent TRA received service of the Administrative Complaint in the present action by certified mail with return receipt requested on April 16, 2024.
2. TRA is interested in negotiating a settlement of the present action in good faith, in order to reach an expeditious and mutually acceptable resolution of the issues raised. To that effect, a meeting with counsel for Complainant and counsel for Respondent Héctor Rodríguez Valle was held on April 2, 2024.

3. Settlement of the present action would promote procedural economy, avoiding the delays and costs resulting from the corresponding administrative proceedings, in the interest of both Complainant and Respondent.
4. TRA understands that a period of sixty (60) days should be adequate to explore whether such a settlement can be reached.
5. The undersigned counsel have contacted counsel for Complainant, Ms. Suzette Meléndez-Colón, who indicated that she has no objection to the present request.

WHEREFORE, Respondent TRA respectfully requests a sixty (60) day extension of time to file an answer to the Administrative Complaint in the present action, in order for the parties to rigorously pursue settlement negotiations.

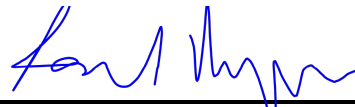
RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 16th day of April, 2024.

DÍAZ & NEGRON LLC
Attorneys for Respondent TRA
PO Box 363004
San Juan, Puerto Rico 00936-3004
Tel. 787-425-0330
Fax 787-425-0334



Karín G. Díaz-Toro
E-mail: kdiaz@dnlawpr.com



Raúl Negrón-Casasnovas
E-mail: rnegrón@dnlawpr.com