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Mitchell H. Bernstein

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March 30, 2012

VIA UNITED PARCEL SERVICE

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency
Region 1 (ORA 18-1)
5 Post Office Square
Boston, MA 02109

Re: In the Matter of Northland Environmental, LLC and PSC Environmental Services, LLC
Docket No. RCRA-01-2012-0028

Dear Ms. Santiago:

Enclosed for filing in the above-referenced matter please find the original and one copy of an Unopposed Motion for Extension of Time to File an Answer and to Request a Hearing.

Thank you for your attention to this matter.

Sincerely,



Mitchell H. Bernstein

Counsel for Northland Environmental, LLC
and PSC Environmental Services, LLC

Enclosures

cc: Andrea Simpson, Esq. (via UPS) (w/ encl.)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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In the Matter of:

Northland Environmental, LLC
275 Allens Avenue
Providence, RI 02905

PSC Environmental Services, LLC
5151 San Filipe Street, Suite 1600
Houston, TX 77056

Respondents

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

Docket No.

RCRA-01-2012-0028

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**UNOPPOSED MOTION FOR
EXTENSION OF TIME
TO FILE AN ANSWER AND
TO REQUEST A HEARING**

Pursuant to 40 C.F.R. §§ 22.7 and 22.16, Respondents Northland Environmental, LLC and PSC Environmental Services, LLC (collectively, "Respondents") respectfully move for a 45-day extension of time to file an answer to the complaint and to request a hearing in this matter, until Monday, June 4, 2012.

In support of this motion, Respondents state as follows:

1. Respondents received the complaint in this matter on March 19, 2012. Pursuant to 40 C.F.R. § 22.15, Respondents' deadline to file an answer and to request a hearing in this matter is April 18, 2012.
2. Respondents have contacted counsel for Complainant and have requested an informal settlement conference in order to explore the possibility of settlement and thus avoid protracted and potentially expensive litigation.
3. Due to the extensive scope and breadth of the complaint, Respondents requested that the initial settlement conference be scheduled in early May 2012, in order to provide Respondents with sufficient time to conduct an internal analysis, and to generate a settlement presentation that will provide a meaningful basis for settlement discussions.

4. Counsel for Complainant has agreed to schedule the initial settlement conference on May 3, 2012.

5. A 45-day extension of time to file an answer and to request a hearing will allow Respondents to focus their resources on the settlement process in the immediate term, and still provide sufficient time to prepare an answer if settlement negotiations do not progress to the satisfaction of either party.

6. Respondents are authorized to represent that counsel for Complainant assents to this motion.

WHEREFORE,

Respondents respectfully request that the deadline for Respondents to file an answer and to request a hearing in this matter be extended to and including Monday, June 4, 2012.

Dated: March 30, 2012



Mitchell H. Bernstein

Van Ness Feldman

1050 Thomas Jefferson St. NW, Suite 700

Washington, DC 20007-3877

Counsel for Northland Environmental, LLC
and PSC Environmental Services, LLC

CERTIFICATE OF SERVICE

I hereby certify that on that date noted below, the foregoing Unopposed Motion for Extension of Time to File an Answer and to Request a Hearing was sent to following parties via United Parcel Service, as set forth below:

Original and one copy:

Wanda Santiago
Regional Hearing Clerk
U.S. EPA, Region 1 (ORA 18-1)
5 Post Office Square, Suite 100
Boston, MA 02109

Copy:

Andrea Simpson, Esq.
Senior Enforcement Counsel
U.S Environmental Protection Agency
Region 1
5 Post Office Square, Suite 100
Boston, MA 02109

Dated: March 30, 2012



Mitchell H. Bernstein
Van Ness Feldman
1050 Thomas Jefferson St NW, Suite 700
Washington, DC 20007

Counsel for Northland Environmental, LLC
and PSC Environmental Services, LLC