

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2**

In the Matter of:

Total Petroleum Puerto Rico, Corp.

Respondent

Proceeding under Section 3008 of the Solid Waste Disposal Act, as amended, 42 U.S.C. § 6928

**COMPLAINT, COMPLIANCE ORDER,
AND NOTICE OF OPPORTUNITY
FOR HEARING**

Docket No. RCRA-02-2018-7101

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**MOTION REQUESTING A 10-DAY EXTENSION OF TIME TO FILE CONSENT
AGREEMENT AND FINAL ORDER**

COMES NOW the Complainant, the United States Environmental Protection Agency (“EPA”) through the undersigned attorney and respectfully alleges and prays as follows:

1. On January 29, 2019, EPA and Total Petroleum Puerto Rico, Corp. (herein collectively “the Parties”) requested an extension of time since the government shutdown made it impossible to complete the process of finalizing and approving the Consent Agreement.
2. The Parties have continued to work to finalize the Consent Agreement. Specifically, Complainant has worked on the approval and concurrence process within the Agency, which has reached its final stages.
3. This Motion has been filed today in order to inform this Honorable Court of the progress made in formalizing this agreement in a fully executed Consent Agreement and Final Order (“CA/FO”), and to request ten (10) days to file the finalized CA/FO.
4. In light of the above, and that there is no undue delay, bad faith or dilatory motive that can affect Respondent’s rights under law, and that there is no prejudice or additional burden, the

Complainant requests this Honorable Court to grant ten (10) additional days to submit a duly authorized CA/FO.

5. This Motion was discussed with Respondent's attorney, who agreed to the filing of this Motion.

Certificate of Service

I hereby certify that a true copy of this Motion was e-mailed to: Rafael Rivera-Yankovich, Toro, Colon & Mullet, PSC; rry@tcm.law.

Respectfully submitted, in Guaynabo, Puerto Rico, this 15th day of March, 2019.



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