

**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
BEFORE THE ADMINISTRATOR**

	)	
In the Matter of:	)	
	)	
Unitek Solvent Services, Inc.	)	Docket No. RCRA-09-2025-0113
	)	
Respondent.	)	
	)	

**SECOND STATUS REPORT AND JOINT MOTION TO EXTEND TIME
FOR FILING CONSENT AGREEMENT AND FINAL ORDER
AND PREHEARING EXCHANGES**

Since the filing of the Status Report in the above-captioned matter on October 17, 2025, the parties continued settlement discussions and hereby inform the Tribunal that they have reached an agreement in principle to resolve this matter.

The October 2, 2025 Prehearing Order established a deadline of November 14, 2025 for filing a fully-executed Consent Agreement and Final Order (“CAFO”) with the Regional Hearing Clerk as well as deadlines of November 14, 2025; December 5, 2025; and December 19, 2025 for filing the prehearing exchanges in the event that the parties were not able to reach a settlement.

The parties hereby file a joint motion requesting the Tribunal to extend the above deadlines by 60 days so that the parties can negotiate and file a final settlement agreement in a timely fashion.

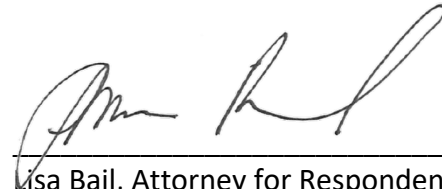
The parties are currently negotiating final terms and language of the CAFO. Due to the ongoing lapse in funding of federal government that has lasted over a month and created a

significant backlog of work, EPA headquarters and Region 9 personnel will need sufficient time to finalize the settlement, and an extension of time to file the CAFO, as well as the alternative deadlines for filing the prehearing exchanges, will facilitate the settlement process.

Finally, the parties request the Tribunal to suspend its review of and decision regarding, and all deadlines pertaining to, Complainant's Motion for a More Definite Statement filed on October 17, 2025 and Respondent's Motion for Leave to Amend the Answer filed on November 6, 2025, pending the parties' filing of the CAFO by the deferred deadline.

Respectfully submitted,

David H. Kim, Attorney for Complainant

A handwritten signature in black ink, appearing to read "Lisa Bail", is written over a horizontal line.

Lisa Bail, Attorney for Respondent

CERTIFICATE OF SERVICE

I, David H. Kim, hereby certify that on November 12, 2025, the foregoing Second Status Report and Joint Motion to Extend Time for Filing the Consent Agreement and Final Order and Prehearing Exchanges has been filed with the EPA Office of Administrative Law Judges, and that a true and correct copy was served by email on counsel for Unitek Solvent Services, Inc.: Lisa Bail at lbail@goodsill.com.

Respectfully submitted,

David H. Kim