

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**BEFORE THE ADMINISTRATOR**

IN THE MATTER OF:	)	Docket No. RCRA-08-2015-0002
	)	
The U.S. Bureau of Reclamation, National	)	<b>UNOPPOSED MOTION FOR</b>
Electric Coil, Environmental Contractors, LLC,	)	<b>EXTENSION OF TIME TO FILE</b>
and CTA Construction and Environmental, LLC,	)	<b>COMPLAINANT'S REBUTTAL</b>
	)	<b>PREHEARING EXCHANGE</b>
Respondents.	)	

Complainant, United States Environmental Protection Agency Region 8 (Complainant), through its undersigned attorney, hereby moves for a two week extension of time to file Complainant's Rebuttal Prehearing Exchange pursuant to rules 40 C.F.R. §§ 22.5, 22.7(b) and 22.16 of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Rules of Practice) and the Prehearing Order of Presiding Officer M. Lisa Buschmann, dated December 29, 2015. The Prehearing Order, as modified by the Presiding Officer's Erratum issued December 30, 2015, currently directs Complainant to file a rebuttal prehearing exchange on or before March 25, 2016. Complainant respectfully requests that this deadline be extended to April 8, 2016. Counsel for Respondents have been consulted about and do not oppose this request.

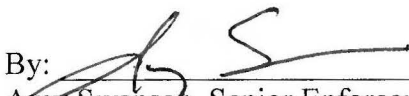
Complainant provides the following explanation in support of this unopposed motion. Complainant received the disk containing Respondents' Prehearing Exchange exhibits on Thursday, March 17, 2016. Due to problems reading the disk and EPA's early office closure on March 23<sup>rd</sup> due to bad weather, Complainant requests additional time to fully review Respondents' exhibits before determining whether or not to respond to Respondents' Prehearing Exchange submittals. Because the undersigned counsel for Complainant will be out of the office March 28 through April 1, 2016, the extended deadline of April 8<sup>th</sup> provides Complainant with approximately one additional week to prepare and file a rebuttal.

For the good cause shown above, upon timely filing and absent any prejudice to the Respondents, Complainant moves for the Presiding Officer to grant the extension requested.

Respectfully submitted,

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

Date: 3/24/2016

By:   
Amy Swanson, Senior Enforcement Attorney  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on March 24, 2016, the foregoing UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE COMPLAINANT'S REBUTTAL PREHEARING EXCHANGE was filed with the Office of Administrative Law Judges and served on each party as follows in accordance with 40 C.F.R. §§ 22.5 and 22.7(b):

By the OALJ E-Filing System:

Ms. Sybil Anderson, Headquarters Hearing Clerk  
U.S. Environmental Protection Agency  
Office of Administrative Law Judges  
Ronald Regan Building, Room M1200  
1300 Pennsylvania Avenue, NW  
Washington, DC 20004

The Honorable M. Lisa Buschmann, Administrative Law Judge  
U.S. Environmental Protection Agency  
Office of Administrative Law Judges  
Ronald Regan Building, Room M1200  
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Washington, DC 20004

Via email and first-class mail to:

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Date: 3/24/2016

By:  \_\_\_\_\_