UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:)	
)	
Nicor Gas,)	DOCKET NO. TSCA-HQ-2015-5017
)	
Respondent.)	

UNOPPOSED MOTION FOR EXTENSION OF TIME TO SUBMIT COMPLAINANT'S REBUTTAL PRE-HEARING EXCHANGE

In accordance with 40 C.F.R. §§ 22.16(a) and 22.7 of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits, Complainant, the Acting Director of the Waste and Chemicals Enforcement Division of the U.S. Environmental Protection Agency, through counsel, submits this Unopposed Motion for Extension of Time to Submit Complainant's Rebuttal Pre-hearing Exchange ("Motion").

Complainant hereby respectfully requests a seven day extension to file its rebuttal prehearing exchange. As described in footnote one of EPA's August 31, 2016 *Motion to Compel Compliance with the Prehearing Order and Motion for Extension of Time*, EPA has not received Respondent's documents with business confidentiality claims. The package was determined to be undeliverable by UPS due to a clerical error by Respondent. The relevant documents appear to be: (1) Exhibit RX118 Park Ridge Protocols, and (2) RX 122 Park Ridge Project Gas Suppliers. Complainant is unsure how voluminous these documents are and the relevance of these documents to the Respondent's case.

For the forgoing reasons, Complainant respectfully requests that this Motion be granted. Prior to filing this Motion, the undersigned contacted the opposing party as to the relief requested herein and understands the Respondent does not oppose this Motion.

Respectfully Submitted,

Washington, D.C. 20460

Email: mcculloch.christine@epa.gov Email: christine.mcculloch@usdoj.gov

(Certificate of Service)

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¹ Complainant is respectfully awaiting this Court's order on this combined motion to compel and for an extension.

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	CERT	CIFICATE OF SERVICE

I hereby certify that the original of the Complainant's *Unopposed Motion for Extension of Time to Submit Complainant's Rebuttal Pre-hearing Exchange*, Docket No. TSCA-HQ-2015-5017, has been submitted electronically using the OALJ E-Filing System.

A copy was sent by email to:

Mark R. Ter Molen Mayer Brown LLP mtermolen@mayerbrown.com

Date: 9/2/2016 /s/ Mark Seltzer

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