

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION I

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Docket No. CAA-01-2008-0104

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In the Matter of:)
)
Southeastern New England)
Shipbuilding Corporation)
10 MacNaught St.)
North Kingstown, RI 02852-7414)
)
Proceeding under Section 113 of)
the Clean Air Act, 42 U.S.C. § 7413)
_____)

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE AN ANSWER

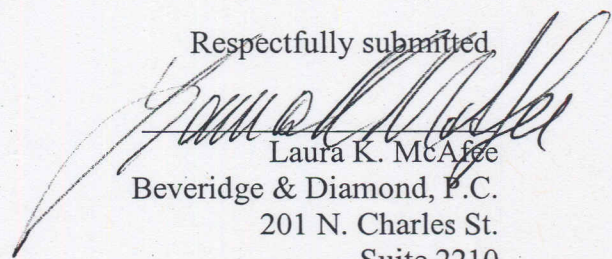
Senesco Marine, LLC ("Senesco") requests that the Regional Judicial Officer of Region I grant a short extension of time to file an Answer to the Administrative Complaint filed in the above-captioned matter, which Senesco received on September 26, 2008. Senesco requests that the deadline for such an Answer be postponed until December 1, 2008, so that Senesco can engage in negotiations with EPA Region I about a potential settlement. Senesco is currently attempting to set up an initial settlement conference in November.

EPA Counsel, Thomas Olivier, has authorized Senesco to state that EPA assents to this Motion.

For the reasons set forth above, Senesco respectfully requests that its Unopposed Motion For Extension Of Time To File An Answer be granted and that the Regional Judicial Officer extend the deadline for Senesco's response to December 1, 2008.

Finally, please note that the Respondent identified in the Complaint, Southeastern New England Shipbuilding Corporation, no longer exists. Senesco is the current owner of the facility that is the focus of the Complaint.

Respectfully submitted,



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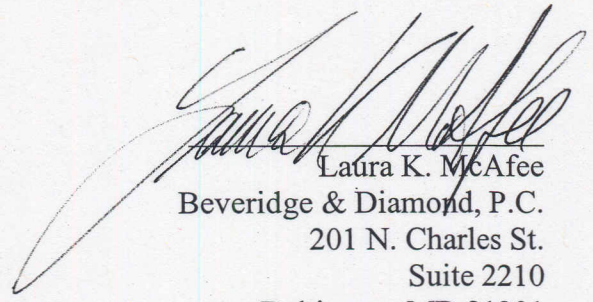
Date: October 21, 2008

Attorneys for Senesco Marine, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Unopposed Motion For Extension Of Time to File An Answer in the matter of Southeastern New England Shipbuilding Corporation, Docket No. CAA-01-2008-0104 was served by United States First Class Mail on the following person, this 21st day of October, 2008:

Thomas Olivier
Senior Enforcement Counsel
U.S. Environmental Protection Agency, Region I
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Attorney for Senesco Marine, LLC