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June 4, 2010

Regional Hearing Clerk
U. S. Environmental Protection Agency, Region 2
290 Broadway, 16th Floor
New York, New York 10007-1866

Re: In the Matter of Oakite Products, Inc., d/b/a Chemetall Oakite,
and Oakite US, Inc. / Docket No. TSCA-02-2009-9148

U.S. ENVIRONMENTAL
PROTECTION AGENCY
REGIONAL HEARING
CLERK
2010 JUN - 8 11 41:40

To Whom It May Concern:

On behalf of the Respondents in this case, we have enclosed for filing the original and two copies of Respondents' Motion for Additional Time for Filing Pre-Hearing Exchange. We would request that you return one file-stamped copy in the enclosed, self-addressed envelope.

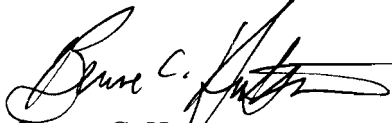
By copy of this letter to Lee A. Spielmann, Assistant Regional Counsel for the U. S. Environmental Protection Agency, we are serving a copy of this pleading on the U. S. Environmental Protection Agency.

By facsimile, we are also sending a copy to Judge Gunning as requested by her assistant.

If you have any questions regarding this matter, please call me.

Sincerely,

McGuireWoods LLP



Benne C. Hutson

BCH/cr
Enclosure

cc: Honorable Barbara A. Gunning
Lee A. Spielmann
Greg Poff

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION TWO

In the Matter of
Oakite Products, Inc., d/b/a
Chemetall Oakite, and Chemetall US, Inc.,

Docket No. TSCA-02-2009-9148

Respondents.

U.S. ENVIRONMENTAL
PROTECTION AGENCY REGIONAL
HEARINGS
CLERK
2010 JUN -8 PM 4:40

MOTION FOR ADDITIONAL TIME FOR
FILING PRE-HEARING EXCHANGE

Respondent in this proceeding, through its attorney, makes this request for this Court to grant an additional extension of time for Respondent to file its pre-hearing exchange and for Complainant to file, if necessary, its rebuttal pre-hearing exchange. This request for an extension is concurred in by Complainant.

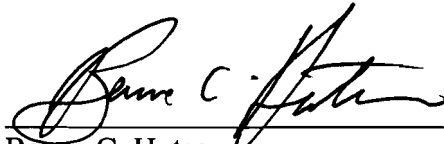
As this Court has been advised in two previous motions for extension of time (both of which have been granted), the parties since December 2009 have been engaged in settlement discussions involving innovative and potentially promising supplemental environmental projects. At a meeting on June 2, 2010, the parties reached an agreement in principle to settle this matter. The parties are now proceeding to agree upon the terms of a Consent Agreement and Final Order which will finalize the terms of that settlement and eliminate the need for further proceedings in this matter. As the parties advised the assistant to Judge Gunning at the conclusion of the meeting on June 2, they anticipate it will take no more than 60 days to finalize the settlement document.

Therefore, Respondent respectfully moves this Court pursuant to 40 CFR Sections 22.4(c)(2), 22.7(b), 22.16(a) and 22.19(a), for an order extending by 60 days the deadline for Respondent to submit its pre-hearing statement and for Complainant, if necessary, to submit its rebuttal pre-hearing statement. With this extension, Respondent would be required to file its

initial pre-hearing statement by August 10 and any rebuttal by Complainant would have to be filed by August 24. In light of the settlement in principle that has been reached by the parties, this extension would preserve the time and other resources of the Court and the parties.

Respectfully submitted,

This 4th day of June, 2010.

A handwritten signature in black ink, appearing to read "Benne C. Hutson", written over a horizontal line.

Benne C. Hutson
Attorney for Respondent

CERTIFICATE OF SERVICE

The undersigned certifies that I have this day served the Motion for Additional Time for Filing Pre-Hearing Exchange upon the following by the methods indicated below, as follows:

Via U.S. Mail

Office of Regional Hearing Court
U.S. Environmental Protection Agency
Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866

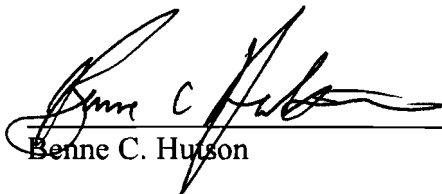
Via Facsimile and U.S. Mail

The Honorable Barbara A. Gunning
Administrative Law Judge
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Mail Code 1900L
Washington, D.C. 20460

Via Electronic and U.S. Mail

Lee A. Spielmann
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866

This 4th day of June, 2010.


Benne C. Hutson