

L'Hommedieu Law Office, P.A.

190 Bates Street
Lewiston, ME 04240

E. Chris L'Hommedieu, Esq.
Stephen Sucey, Esq. (Admitted in ME, NH)
Melissa J. Boucher, Paralegal

Phone: (207) 786-5244
Fax: (207) 784-3472
lewistonlaw@yahoo.com

RECEIVED
17
NOV 17 2009

EPA ORC
Office of Regional Hearing Clerk

November 15, 2009

Wanda Santiago
Regional Hearing clerk
USEPA, Region 1
One Congress Street, Suite 1100 (RAA)
Boston MA 02114-2023

RE: Administrative Complaint and Notice of Opportunity for Hearing
In the matter of Lin-Cor Environmental LLC
Docket# RCRA-01-2009-0081

By fax to: 617-918-0113 (Regional Hearing Clerk's Office)
617-918-0180 (Amanda at EPA)

Dear Ms. Santiago:

Please find following my motion to expand the time to file an answer in this matter and an answer for Lin-Cor Environmental.

With my best wishes I remain,

Very Truly Yours,



/s/E. Chris L'Hommedieu
E. CHRIS L'HOMMEDIEU, ESQ.

ECL/mjb

Dated: 11/15/2009



E. Chris L'Hommedieu, Esq., Bar No. 8299
Attorney for Plaintiff
L'Hommedieu Law Office, P.A.
190 Bates Street
Lewiston ME 04240

In the Matter Of:)
)
)
Lin-Cor Environmental LLC)
276 Dow Highway)
Eliot Maine 03903)
)
RESPONDENT)
)
Proceeding under Section 3008(a))
of the Resource Conservation Act)
42 USC 6928(a))

EPA Docket# RCRA-01-2009-0081
ANSWER TO COMPLAINT

RECEIVED

NOV 17 2009

EPA ORC
Office of Regional Hearing Clerk

NOW COME the respondent, Lin-Cor Environmental LLC and answers the EPA complaint as follows:

1. Respondent admits the allegations contained in paragraphs 1, 2 (to the extent the allegation is that EPA notified Lin-Cor of this proceeding), 3, 4, 5, 6, 7, 8, 9, 10, 11, 14, 16, 17 (to the extent the allegation asserts violations were claimed), 18, 19, 20, 24, 28 (but denies that any ignition or fire could have occurred), 33, 24, 37, 40, 41, 44, 45, 50, 51, 55, 56, 61, 62, 66, 67, 71, 72.
2. Respondent denies the allegations contained in paragraphs 12, 15, 21, 22, 23, 25, 26, 27, 29, 30, 31, 32, 35, 36, 38, 39, 42, 43, 46, 47, 48, 49, 52, 53, 54, 57, 58, 59, 60, 63, 64, 65, 68, 69, 70, 73, 74.
3. Respondent is without sufficient information to admit or deny the allegations in paragraph 13 and therefore denies the same.
4. An admission of any paragraph that asserts an incorporation by reference of any preceding paragraphs is not an admission as to the truth of the preceding paragraphs, and is merely an admission that the prior paragraphs are incorporated by reference.
5. Respondent requests a hearing on all matters in the complaint.
6. Respondent contests all factual assertions which would support a claim of violations as indicated by the answers and denials above.

Dated: 11/15/2009



E. Chris L'Hommedieu, Esq., Bar No. 8299
Attorney for Plaintiff
L'Hommedieu Law Office, P.A.
190 Bates Street
Lewiston ME 04240
(207) 786-5244

