UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 1

IN THE MATTER OF:	
) ASSENTED-TO MOTION FOR
	EXTENSION OF TIME TO
TRIRAM CONNECTICUT LLC) FILE ANSWER
171 Brownstone Avenue)
Portland, Connecticut 06480-1895)
)
) Docket No. CWA-01-2009-0053
Respondent.)

ASSENTED-TO MOTION FOR EXTENSION OF TIME TO FILE ANSWER

Pursuant to Rule 22.7(b) of the Consolidated Rules of Practice (40 C.F.R. § 22.7(b), Respondent Triram Connecticut LLC ("Triram"), by and through its counsel, respectfully requests a 30-day extension of time to file its Answer to Administrative Complaint and as good cause therefor states as follows:

- 1. The United States Environmental Protection Agency ("U.S. EPA") filed its Administrative Complaint and Notice of Opportunity to Request a Hearing on October 26, 2009. Accordingly, Respondent's Answer to Administrative Complaint is due to be filed on November 25, 2009.
- 2. Triram and U.S. EPA have agreed to hold a settlement conference in December 2009. Accordingly, Triram seeks a 30-day extension to permit the parties to continue the settlement process.
- 3. Counsel for the U.S. EPA has assented to this request for extension of time to file an answer.

Respectfully submitted,

TRIRAM CONNECTICUT LLC

Carrie 4/ Tayre

By its attorneys

H. Hamilton Hackney (BBO #628307)

Carrie J. Payne (BBO #672502)

GREENBERG TRAURIG, LLP

One International Place

Boston, MA 02110

(617) 310-6000

P a diameter f PPC a selevice of a constant of the constant of

APPER AT THE TOTAL PROPERTY OF THE TOTAL PRO

national factors and a large state of the same of the con-

to the second of the second of

K at a last transfer of the

CERTIFICATE OF SERVICE

I certify that the foregoing Assented-to Motion for Extension of Time to File Answer, dated November 20, 2009, was sent this day in the following manner to the addresses listed below.

Original by Hand Delivery to:

Judy Lao-Ruiz

Acting Regional Hearing Clerk (RAA)

U.S. EPA - Region 1

One Congress Street, Suite 1100 (SEL)

Boston, MA 02114-2023

Copy by certified mail, return receipt requested, to:

Jeffrey Kopf, Senior Enforcement Counsel Office of Environmental Stewardship (SEL)

U.S. EPA - Region 1

One Congress Street, Suite 1100

Boston, MA 02114-2023

Dated: 11/20/09

Carrie J. Payne,

GREENBERG TRAURIG, LLP One International Place, 20th Floor

Boston, MA 02110 (617) 310-6000

to age to see the see and the