UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 1

	2009 FEB 24 P 12: 31
IN THE MATTER OF:) ETA DRC
NORTHEAST PRODUCTS CO., INC. 52 Ferry Street) ALGIS TOT WR)
Fall River, Massachusetts,	 Proceeding to Assess Class II Civil Penalty Under
	Clean Water Act Section 311 and a Civil Penalty under Section 325 of the Emergency Planning and Community Right-to-Know Act
Respondent.) Docket Nos. CWA-01-2009-0011 EPCRA-01-2009-0012
))

MOTION FOR AN EXTENSION OF TIME TO ANSWER COMPLAINT

Respondent Northeast Products Co. ("Northeast") hereby moves pursuant to 40 C.F.R. §

22.16, for an additional 30 day extension of time to file an Answer to the Complaint in this matter.

Northeast states that it has reached a settlement in principle on this matter with EPA, and EPA is in the process of preparing the settlement documents. Northeast seeks an extension until March 27, 2009 to file its Answer.

The undersigned has conferred with Mary Jane O'Donnell, attorney for EPA, and she has stated that EPA has no objection to this extension.

NORTHEAST PRODUCTS CO.

By its attorneys.

Alexandra K. Callam (#5358) Hinckley, Allen & Snyder LLP 50 Kennedy Plaza, Suite 1500 Providence, RI 02903 Tel. 401-274-2000 Fax. 401-277-9600

Dated: February 23, 2009

CERTIFICATION

To:

Wanda Santiago Regional Hearing Clerk (RAA) U.S. EPA, Region 1 One Congress Street, Suite 1100 Boston, MA 02114-2023 Mary Jane O'Donnell, Esq.
Office of Site Remediation and Restoration (HBT)
U.S. EPA, Region 1
One Congress Street, Suite 1100
Boston, MA 02114-2023

Jeans L. Massolf

I hereby certify that I sent via federal express a copy of the within Motion for an Extension of Time to Answer Complaint to the individuals listed above on the 23rd day of February, 2009.

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