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January 8, 2009

Paul T. Koenig, Jr.
Counsel

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

**Re: Docket No. CAA-02-2008-1215, Ronson Consumer Products,
Woodbridge, NJ**

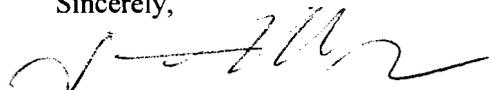
Dear Ms. Maples:

Enclosed please find for filing original and one copy of the following in reference to the captioned matter:

1. Respondent's Motion for an Extension of Time to File Prehearing Exchanges to Allow Parties to Complete Execution of Consent Agreement;
2. Certification of Janine G. Bauer, Esq., Attorney for Respondent;
3. Proposed Order;
4. Certification of Service

Please be advised that I have the consent of EPA attorney, Damaris Cristiano, to file this motion.

Sincerely,



Janine G. Bauer,
Attorney for Respondent
Ronson Consumer Products Corporation

JGB:scj

Enclosures

c/enc: Honorable Chief Judge Susan L. Biro
Damaris Cristiano, Esquire

+Certified by the Supreme Court of
New Jersey as a Matrimonial Attorney

++Certified by the Supreme Court of
New Jersey as a Civil Trial Attorney

+++Certified by the Supreme Court of
New Jersey as a Criminal Trial Attorney

*NJ & PA Bars

**NJ & NY Bars

***NJ, NY & PA Bars

****NJ, NY, PA & FL Bars

*****NJ, NY, PA, MD & DC Bars

REGIONAL HEARING
CLERK

2009 JAN 13 PM 12:17

ENVIRONMENTAL
PROTECTION AGENCY-REG-011

Office of Administrative Law
United States Environmental Protection Agency

In the Matter of
Ronson Consumer Products Corporation

Docket No. CAA-02-2008-1215

U.S. ENVIRONMENTAL
PROTECTION AGENCY REG. 11
2009 JAN 13 PM 12:47
REGIONAL HEARING
CLERK

RESPONDENT'S MOTION FOR AN EXTENSION OF TIME TO FILE
PREHEARING EXCHANGES TO ALLOW PARTIES
TO COMPLETE EXECUTION OF CONSENT AGREEMENT

Respondent Ronson Consumer Products Corporation hereby moves before the Office of Administrative Law, The Honorable Chief Judge Susan L. Biro, assigned, for an extension of time for thirty (30) days from today for both Complainant and Respondent to file pre-hearing exchange documents in accordance with the Prehearing Order entered on December 2, 2008, to allow for execution of the Consent Agreement, the form of which has been agreed upon, by the parties.

In support of this motion, Respondent relies upon the enclosed Certification of Janine G. Bauer, Esq., Respondent's attorney.

A proposed form of Order is also enclosed.

Respectfully submitted,



Janine G. Bauer, Esq.
Attorney for Respondent
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Blader, P.C.
101 Grovers Mill Road, Ste. 200
Lawrenceville, N.J. -8648
Tel (609) 275-0400
jbauer@szaferman.com

Dated: January 8, 2009

Office of Administrative Law
United States Environmental Protection Agency

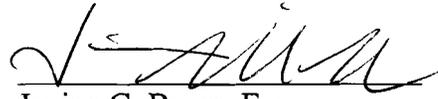
In the Matter of
Ronson Consumer Products Corporation

Docket No. CAA-02-2008-1215

CERTIFICATION OF JANINE G. BAUER, ESQ.,
ATTORNEY FOR RESPONDENT
RONSON CONSUMER PRODUCTS CORPORATION

1. I am counsel to Ronson Consumer Products Corporation in the above-referenced matter and I am fully familiar with the facts stated herein. I make this certification in support of a motion for an extension of time to complete the execution of the agreed-upon Consent Agreement.
2. At this juncture, I do not think it is possible to file the Consent Agreement and Final Order by January 16, 2009, to avoid having to file the Pre-hearing Exchange documents (for Complainant on January 16, 2009 and for Respondent on February 6, 2009).
3. The parties have reached a settlement and have agreed upon the form and substance of the Consent Agreement. It took until yesterday to move through EPA's concurrence process before it was sent out to me for my client's signature. The holidays were an impediment to expediting this matter within the Agency. During that concurrence process, both parties were diligently discussing it with clients, counsel and staff to ensure that once concurrence was received, the document would be ready for execution, however. My client also underwent a change in management in December, consolidating the chief operating officer position in one person, who is not the person I had been dealing with previously in an officer position.
4. Even assuming my client executes the document today or tomorrow, it is my understanding that USEPA requires another three signatures or sign-offs upon the document being returned to them. Because the current Regional Administrator is leaving on January 22, 2009, there is some volume, and getting approvals expeditiously is not absolutely certain.
5. Complainant agrees to the extension of time requested herein, to February 6, 2009.
6. Respondent believes that the request for an extension of time is appropriate and in the public interest. Once the alleged violations were corrected, and the settlement was reached, the expenditure of time, costs and fees to litigate this matter by preparing for the hearing when the parties are only waiting for signatures on an approved Consent Agreement, would be futile and further damage Respondent's financial condition.

The foregoing statements are true. I understand that if any of the foregoing statements are willfully false, I am subject to punishment for perjury.


Janine G. Bauer, Esq.

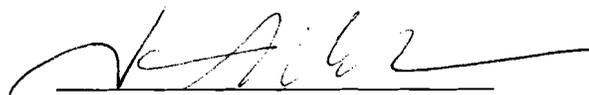
Dated: January 8, 2009

CERTIFICATION OF SERVICE

I, Janine G. Bauer, certify that I have served a copy of Ronson Consumer Products Corporation's Motion for an Extension of Time to File Prehearing Exchanges to Allow Parties to Complete Execution of Consent Order by First Class Mail on this date to the following:

The Honorable Susan L. Biro
Chief Administrative Law Judge
Office of Administrative Law Judges
U.S. Environmental Protection Agency
Mail Code 1900L
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Damaris Cristiano, Esq,
U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866



JANINE G. BAUER

DATED: January 8, 2009