UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 1

IN THE MATTER OF: NORTHEAST PRODUCTS CO INC.	
52 Ferry Street	8
Fall River, Massachusetts,	e e
	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 with EPA on this Complaint, and Northeast has executed the agreed-to documents reflecting this settlement. The undersigned has conferred with Mary Jane O'Donnell, attorney for EPA, and she has stated that EPA plans to execute these settlement documents shortly. Northeast therefore seeks an extension until April 27, 2009 to file its Answer. Ms. O'Donnell has stated to the undersigned that she 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: March 26, 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

I hereby certify that I faxed and mailed a copy of the within Motion for an Extension of Time to Answer Complaint to the individuals listed above on the 26th day of March, 2009.

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