

RECEIVED

JUL 24 2012

EPA ORC
Office of Regional Hearing Clerk

July 23, 2012

HAND DELIVERED

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code: ORA18-1
Boston, Massachusetts 02109-3912

Re: **Private Reserve Properties, LLC**
Docket No. TSCA-01-2012-0055

Dear Ms. Santiago:

Please find enclosed for filing an original and one copy of Respondent's Motion for Extension of Time to File Answer in the above-referenced matter.

Please feel free to contact me if you have any questions.

Very truly yours,



KRISTEN W. SHERMAN
ksherman@apslaw.com

KWS:af
Enclosures

cc: Laura J. Beveridge, Esq. (via hand delivery w/ encl.)

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I**

RECEIVED
JUL 24 2012
EPA ORC
Office of Regional Hearing Clerk

_____)
In the Matter of:)
)
Private Reserve Properties, LLC)
59 Elmwood Avenue)
Providence, RI 02907)
)
)
Respondent,)
)
Proceeding under Section 16(a) of the)
Toxic Substances Control Act,)
42 U.S.C. § 261.5(a))
_____)

Docket Number:
TSCA-01 2012-0055

MOTION FOR EXTENSION OF TIME TO FILE ANSWER

Pursuant to 40 CFR §22.16, Private Reserve Properties, LLC (“Respondent”) hereby moves for an extension of time up to and including August 31, 2012 to file its Answer to the Administrative Complaint (“Complaint”) in the above-referenced matter. As grounds for the requested relief, Respondent states that the Complaint involves multiple properties and lease transactions. Respondent needs additional time to adequately review the relevant documents and respond to the allegations for each different property. Moreover, Respondent and the Environmental Protection Agency, Region 1 (“Complainant”) are meeting on July 25, 2012 and Respondent is optimistic that, if given the additional time, the parties will be able to resolve the dispute through the settlement process. Complainant has no objection to the requested extension.

WHEREFORE, Respondent respectfully requests that its Motion for Extension of Time to File Answer be granted and that it be allowed up to and including August 31, 2012 to file its Answer to the Complaint.

Respondent,
Private Reserve Properties, LLC
By its Attorneys,

 (circled initials)

Kristen W. Sherman, Esq. (R.I. Bar #5595/MA Bar #630141)

ADLER POLLOCK & SHEEHAN P.C.

One Citizens Plaza, 8th Floor

Providence, Rhode Island 02903

Tel: (401) 274-7200

Fax: (401) 351-4607

ksherman@apslaw.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the within Motion for Extension of Time to File Answer was served on the following via hand-delivery on the 23rd day of July, 2012:

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code: ORA18-1
Boston, Massachusetts 02109-3912

Laura J. Beveridge, Esq.
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code: OES 04-3
Boston, Massachusetts 02109-3912

 (circled initials)