

FULBRIGHT
& Jaworski L.L.P.
Attorneys at Law

98 San Jacinto Boulevard, Suite 1100 • Austin, Texas 78701-4255
psarahan@fulbright.com • Direct: 512 536 2493 • Main: 512 474 5201 • Facsimile: 512 536 4598

November 29, 2012

VIA CERTIFIED MAIL - RETURN RECEIPT

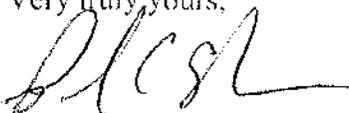
Regional Hearing Clerk
Mail Code 6RC-D
US Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: RCRA-06-2013-0902

Dear Sir or Madame:

Enclosed please find TM Chemicals Limited Partnership's Unopposed Motion for Extension of Deadline for Filing an Answer and Requesting a Hearing for filing in the above-referenced matter. Please contact me if you have any questions.

Very truly yours,



Paul C. Sarahan

PCS//pid
Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
BEFORE THE ADMINISTRATOR

FILED
2012 DEC -4 PM 4:09
ADMINISTRATIVE HEARING CLERK

IN THE MATTER OF: §
§
TM CHEMICALS LIMITED § EPA DOCKET NO.
PARTNERSHIP § RCRA-06-2013-0902
§
§
HARRIS COUNTY, TEXAS §

TM Chemicals Limited Partnership's Unopposed Motion
for Extension of Deadline for Filing an Answer and Requesting a Hearing

COMES NOW, TM Chemicals Limited Partnership ("TM Chemicals") and files its Unopposed Motion for Extension of Deadline for Filing an Answer and Requesting a Hearing, pursuant to 40 C.F.R. § 22.7(b). This Motion is filed for the purpose of facilitating the discussion of a potential resolution of the matter and any necessary follow-up. TM Chemicals and the Environmental Protection Agency ("EPA") have agreed to meet to discuss the pending issues and determine the potential for a resolution of the matter. This meeting is scheduled to occur on December 14, 2012.

To facilitate this discussion, TM Chemicals respectfully requests that TM Chemicals' deadline for filing an answer and requesting a hearing in this matter be extended to January 18, 2013. Counsel for TM Chemicals has conferred with counsel for EPA with respect to this Motion and EPA does not oppose this Motion.

Respectfully submitted,

FULBRIGHT & JAWORSKI L.L.P.



PAUL C. SARAHAN

Texas State Bar No.: 17648200
98 San Jacinto Blvd., Suite 1100

Austin, Texas 78701
Telephone: 512-536-2493
Facsimile: 512-536-4598

Attorneys for Respondent,
TM Chemicals Limited Partnership

APPROVED AS TO FORM:



Jonathan Bull
Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 6

Attorneys for Complainant,
U.S. Environmental Protection Agency, Region 6

CERTIFICATE OF SERVICE

I certify that, on November 29, 2012, TM Chemicals Limited Partnership's Unopposed Motion for Extension of Deadline for Filing an Answer and Requesting a Hearing was served by first-class mail and electronic mail to:

Jonathan Bull
Assistant Regional Counsel
Mail Code 6RC-ER
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Regional Hearing Clerk
Mail Code 6RC-D
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733



PAUL C. SARAJIAN