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April 4, 2012

Via Overnight Delivery

Ms. Wanda Santiago
Regional Hearing Clerk
U.S. EPA, Region 1 (ORA 18-1)
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Re: Northeast Housing LLC and Balfour Beatty Military Housing Management, LLC
Docket No. TSCA-01-2012-0006

Dear Ms. Santiago:

I am pleased to report to you that the parties have agreed in principle to terms settling the above-mentioned matter. The parties expect to present an executed Consent Agreement and Final Order within the next few weeks. Accordingly, we request that the time to answer the Complaint in the above-mentioned matter be extended one more time so as to allow enough time for review, signature, and filing of the CAFO. Attached is a motion to that effect.

Please do not hesitate to contact me or Ms. Laura Berry (counsel for EPA) if you have any questions or require any further information.

Sincerely,



Edward A. Kazmarek

EAK/ns
Enclosures

cc: Ms. Laura J. Berry
Enforcement Counsel, U.S. EPA, Region 1
Northeast Housing, LLC
Balfour Beatty Military Housing Management, LLC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

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IN THE MATTER OF:

NORTHEAST HOUSING, LLC AND
BALFOUR BEATTY MILITARY
HOUSING MANAGEMENT, LLC

Docket No. TSCA-01-2012-0006

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MOTION FOR ADDITIONAL EXTENSION OF TIME TO ANSWER
BY NORTHEAST HOUSING, LLC AND
BALFOUR BEATTY MILITARY HOUSING MANAGEMENT, LLC

Respondents Northeast Housing, LLC and Balfour Beatty Military Housing Management, LLC (collectively "Respondents") hereby move for an additional extension of time to answer, move, or otherwise respond to the Complaint filed in the above-captioned matter. The grounds for this motion are more fully set forth below.

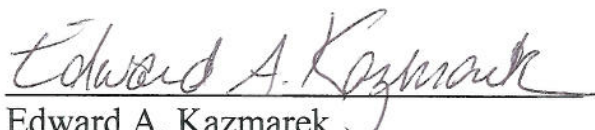
1. Respondents acknowledged service of the Complaint in the above-captioned matter on December 14, 2011. Through a series of prior orders, the time for Respondents to answer has been extended through April 6, 2012.

2. The Parties have reached a settlement in principle of the above-captioned matter and are now circulating the settlement agreement for final review and signature.

3. Accordingly, to allow the necessary time for the Parties to review and execute the settlement agreement, without having to answer or otherwise plead to avoid an untimely response, Respondents respectfully request that the time to answer, move, or otherwise respond to the Complaint be extended thirty days through May 7, 2012.

4. Enforcement counsel for EPA has authorized the undersigned to state that EPA does not oppose the requested extension.

This 4th day of April, 2012.


Edward A. Kazmarek
Counsel for Respondents

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CERTIFICATE OF SERVICE

This is certify that I have this day served the within and foregoing "Motion for Extension of Time by Northeast Housing, LLC and Balfour Beatty Military Housing Management, LLC" by causing same to be delivered via overnight delivery to:

Ms. Wanda Santiago (original and one copy)
Regional Hearing Clerk
U.S. EPA, Region I (ORA 18-1)
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Laura J. Berry (copy)
Enforcement Counsel
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100 (Mail Code: OES04-2)
Boston, MA 02109-3912
(with an additional copy sent via e-mail to:
Berry.LauraJ@epamail.epa.gov)

This 4th day of April 2012.


Edward A. Kazmarek
Counsel for Respondents

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