

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

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2009 DEC 22 A 11:15

IN THE MATTER OF:)
)
)
)
TRIRAM CONNECTICUT LLC)
171 Brownstone Avenue)
Portland, Connecticut 06480-1895)
)
)
Respondent.)

**ASSENTED-TO MOTION FOR
EXTENSION OF TIME TO
FILE ANSWER**

EPA ORC
OFFICE OF
REGIONAL HEARING CLERK

Docket No. CWA-01-2009-0053

ASSENTED-TO MOTION FOR EXTENSION OF TIME TO FILE ANSWER

Pursuant to Rule 22.7(b) of the Consolidated Rules of Practice (40 C.F.R. § 22.7(b)), Respondent Triram Connecticut LLC (“Triram”), by and through its counsel, respectfully requests an additional 30-day extension of time to file its Answer to Administrative Complaint and as good cause therefor states as follows:

1. The United States Environmental Protection Agency (“U.S. EPA”) filed its Administrative Complaint and Notice of Opportunity to Request a Hearing on October 26, 2009. Respondent’s Answer to Administrative Complaint was due to be filed on November 25, 2009.
2. Because Triram and U.S. EPA have engaged in settlement negotiations, Triram submitted an Assented -To Motion for Extension of Time to File Answer on which was granted. The Answer is now due to the U.S. EPA on December 28, 2009.
3. However, as the settlement negotiations remain ongoing, Triram seeks an additional 30-day extension to permit the parties to continue the settlement process.
4. Counsel for the U.S. EPA has assented to this request for extension of time to file an answer.

Respectfully submitted,

TRIRAM CONNECTICUT LLC

By its attorneys,

Carrie Payne

H. Hamilton Hackney (BBO #628307)

Carrie J. Payne (BBO #672502)

GREENBERG TRAURIG, LLP

One International Place
Boston, MA 02110
(617) 310-6000

CERTIFICATE OF SERVICE

I certify that the foregoing Assented-to Motion for Extension of Time to File Answer, dated December 22, 2009, was sent this day in the following manner to the addresses listed below.

Original by Hand Delivery to: Judy Lao-Ruiz
Acting Regional Hearing Clerk (RAA)
U.S. EPA
5 Post Office Square
Suite 100
Boston, MA 02109-3912

Copy by certified mail, return receipt requested, to:

Jeffrey Kopf, Senior Enforcement Counsel
Office of Environmental Stewardship (SEL)
U.S. EPA
5 Post Office Square
Suite 100
Boston, MA 02109-3912

Dated: 12/22/09



Carrie J. Payne,
GREENBERG TRAURIG, LLP
One International Place, 20th Floor
Boston, MA 02110
(617) 310-6000

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Tel. 617.310.5276
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payneca@gtlaw.com

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REGISTRATION & HEARING CLERK

December 22, 2009

VIA HAND DELIVERY

Judy Lao-Ruiz
Acting Regional Hearing Clerk (RAA)
U.S. EPA
5 Post Office Square
Suite 100
Boston, MA 02109-3912

Re: In the Matter of Triram Connecticut LLC
Docket No. CWA-01-2009-0053

Dear Madam:

Please find enclosed a Assented-to Motion for Extension of Time to File Answer to be entered on behalf of Respondent in the above-referenced matter.

Please date stamp one copy of the cover letter and Motion and return to the awaiting messenger.

Thank you for your assistance.

Best regards,



Carrie J. Payne

Enclosure

ALBANY
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