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December 23, 2011

EPA ORC  
OFFICE OF  
REGIONAL HEARING CLERK

Wanda Santiago  
Regional Hearing Clerk  
U.S. EPA, Region I  
5 Post Office Square, Suite 100  
Mail Code: ORA18-1  
Boston, MA 02109-3912

Re: In the Matter of Asnat Realty, LLC and Evergreen Power, LLC  
Docket No. TSCA-01-2011-0125

Dear Ms. Santiago:

Enclosed please find a Motion for Extension of Time to Answer with regard to the above-captioned action. The Motion seeks an extension to January 30, 2012.

Sincerely,



Mary McQueeney  
Law Offices of Alan M. Kosloff  
Respondents' Attorneys

cc: Catherine Smith, Esq.

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I**

\_\_\_\_\_  
IN THE MATTER OF: )  
)  
)

Asnat Realty, LLC )  
Evergreen Power, LLC )  
c/o Law Offices of Alan M. Kosloff )  
28 North Main Street )  
West Hartford, CT 06107 )

Respondents. )  
)  
)

Proceeding under Section 16(a) of the )  
of the Toxic Substances Control Act, )  
42 U.S.C. § 2615(a). )  
\_\_\_\_\_ )

Docket Number

**TSCA-01-2011-0125**

**MOTION TO EXTEND TIME TO ANSWER**

Respondents move for an extension of time to file the Answer in the above-captioned action. An extension was requested up to November 28, 2011. Subsequently, Respondents and Attorney Chin had reached an agreement to further extend the time to Answer. However, it now appears that the additional motion for that extension may not have been filed by EPA (as the parties had agreed). Therefore, this Motion seeks an extension from the prior deadline to January 30, 2012. Respondents have advised EPA that they will be submitting documentation to support a reduced penalty based on financial hardship. Respondents request an extension to answer the complaint so that they can prepare and submit the ability-to-pay information, and so that the Environmental Protection Agency ("EPA") has sufficient time to evaluate that data, prior to the Answer being due. Counsel for EPA has indicated that she is not opposed to the extension.

Respectfully submitted,  
**Asnat Realty, LLC**  
**Evergreen Power, LLC**



Mary McQueeney  
Law Offices of Alan M. Kosloff  
Their Attorneys  
28 North Main Street  
West Hartford, CT 06107

**Date: December 23, 2011**

In the Matter of **Asnat Realty, LLC and Evergreen Power, LLC**  
Docket No. **TSCA-01-2011-0125**

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion to Extend Time to Answer was sent via first class mail and filed with the Regional Hearing Clerk's office at the following address:

Wanda Santiago  
Regional Hearing Clerk  
U.S. EPA, Region I  
5 Post Office Square, Suite 100  
Mail Code: ORA18-1  
Boston, MA 02109-3912

and that a copy was sent to Complainant by first class mail at the following address:

Catherine Smith, Esq.  
U.S. EPA, Region I  
5 Post Office Square, Suite 100  
Mail Code: OES04-4  
Boston, MA 02109-3912

**Asnat Realty, LLC**  
**Evergreen Power, LLC**

  
\_\_\_\_\_  
Mary McQueeney  
Law Offices of Alan M. Kosloff  
Their Attorneys  
28 North Main Street  
West Hartford, CT 06107

**Date: December 23, 2011**