

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

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

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

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 a 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. Accordingly, Respondent’s Answer to Administrative Complaint is due to be filed on November 25, 2009.
2. Triram and U.S. EPA have agreed to hold a settlement conference in December 2009. Accordingly, Triram seeks a 30-day extension to permit the parties to continue the settlement process.
3. 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 J. 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 November 20, 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 - Region 1
One Congress Street, Suite 1100 (SEL)
Boston, MA 02114-2023

Copy by certified mail, return receipt requested, to:

Jeffrey Kopf, Senior Enforcement Counsel
Office of Environmental Stewardship (SEL)
U.S. EPA - Region 1
One Congress Street, Suite 1100
Boston, MA 02114-2023

Dated: 11/20/09



Carrie J. Payne,
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November 20, 2009

VIA HAND DELIVERY

Judy Lao-Ruiz
Acting Regional Hearing Clerk (RAA)
U.S. EPA - Region 1
One Congress Street, Suite 1100 (SEL)
Boston, MA 02114-2023

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

Dear Sir/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