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30 January 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:

Enclosed please find an original and one copy of a "Motion for Additional Extension of Time to Answer" for filing in the above-mentioned matter. Please do not hesitate to contact me if you have any questions or require anything further.

Sincerely,


Edward A. Kazmarek

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

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. By an order entered on January 13, 2012, the time for Respondents to answer the Complaint was extended through February 7, 2012.

2. On January 24, 2012, the Parties met in person at Region 1 headquarters. As a result of that meeting, the Parties have agreed that the Parties

will exchange additional information and conduct further discussions to seek a mutually agreeable settlement of the matters raised in the Complaint.

3. The parties have agreed that the parties' resources are better allocated at this time to discussion of the underlying claim and exploration of possible grounds for settlement.

4. Accordingly, to allow Respondents adequate time to provide the additional information requested by EPA, and to avoid the diversion of time and resources that would be better spent pursuing any potential settlement, Respondents request that the time for Respondents to answer, move, or otherwise respond to the Complaint be extended until and through **March 9, 2012**.

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

This 30th day of January, 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 30th day of January 2012.



Edward A. Kazmarek
Counsel for Respondents

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