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December 10, 2008

VIA OVERNIGHT MAIL

Ms. Wanda Santiago
Regional Hearing Clerk
United States Environmental Protection Agency
One Congress Street, Suite 1100 (RAA)
Boston, MA 02114-2023

Re: In the Matter of The Jackson Laboratory, Inc.;
Docket Nos: RCRA- 01-2008-0074; EPCRA- 01-2008-0091

Dear Ms. Santiago:

Please find enclosed an original and one copy of the Consented to Motion for Extension of Time in Which to Answer for filing in the above-captioned docket.

I have separately sent a copy via email and overnight mail to Joshua Secunda, as noted in the enclosed Certificate of Service.

Thank you.

Very truly yours,

Kenneth F. Gray

KFG:nej
Enclosure

cc: Joshua Secunda, Senior Enforcement Counsel, U.S. EPA Region 1

In the Matter of:)

The Jackson Laboratory)
600 Main Street)
Bar Harbor, Maine 04609)

Respondent.)

EPA I.D. No. MED042140483)

Proceeding under Sections 3008(a) of the)
Resource Conservation and Recovery Act,)
42 U.S.C. § 6928(a); and Section 325(c))
of the Emergency Planning and Community)
Right-to-Know Act, 42 U.S.C. § 11045(c))

EPA Docket Numbers
RCRA- 01-2008-0074
EPCRA- 01-2008-0091

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**CONSENTED TO
MOTION FOR
EXTENSION OF TIME
IN WHICH TO ANSWER**

1. The Jackson Laboratory, Inc. received the Complaint in the above-captioned matter on Monday, September 29, 2008. In accord with 40 C.F.R. § 22.15(a), Respondent must file an Answer to said Complaint within 30 days after service of the Complaint, which date was Wednesday, October 29, 2008. Respondent obtained a 37-day extension to submit its Answer from October 29, 2008 to December 5, 2008.

2. The Respondent requests a further extension of time until February 3, 2009. The basis for this request is:

a. The Jackson Laboratory and Respondent's counsel scheduled a meeting with Joshua Secunda, Senior Enforcement Counsel for EPA in this matter,

and others, on December 9, 2008. Respondent's counsel suffered a sudden death in his family requiring travel to California, and EPA's RCRA scientist was also unavailable that day due to pneumonia.

3. Joshua Secunda, Senior Enforcement Counsel for EPA in this matter, consented to this Motion for Extension of Time.

4. For these reasons, Respondent and EPA request the Regional Judicial Officer or his/her designate to order an extension of time to file an Answer to the Complaint to Tuesday, February 3, 2009.

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12/10/08
Date

EPA DOCKET NOS.
RCRA- 1-2008-0074
EPCRA- 01-2008-0091

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Consented to Motion for Extension of Time in Which to Answer has been sent to the following person on the date noted below:

Copy via pdf electronic mail and overnight mail:

Joshua Secunda, Esq.
Senior Enforcement Counsel (SPP)
U.S. Environmental Protection Agency, Region 1
One Congress Street, Suite 1100
Boston, MA 02114-2023
617-918-1736
secunda.josh@epa.gov

Dated: December 10, 2008


Kenneth F. Gray, Esq.