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April 1, 2019

**Via Certified Mail
(Article 7017 2400 0000 0924 1427)
and E-Mail (santiago.wanda@epa.gov)**

Wanda Santiago
Regional Hearing Clerk
U.S. EPA, Region I
5 Post Office Square, Suite 100 (ORA 04-1)
Boston, MA 02109-3912

Re: Ahmad Alijabbari
EPA Docket No. TSCA-01-2018-0061

Dear Ms. Santiago:

Enclosed herewith for filing please find a Motion for Extension of Time to File Answer to Complaint along with a Certificate of Service and proposed Order.

Thank you for your attention to this matter. Please contact me if you have any questions.

Very truly yours,



Shane T. Wright

STW/cms

Enclosures

cc: Peter DeCambre, Esq. (Via E-Mail and Certified Mail, w/ enclosures)
Ahmad Alijabbari (Via E-Mail, w/ enclosures)

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I**

IN THE MATTER OF:

Ahmad Alijabbari
5 Saint Tekakwitha Drive
Lewiston, ME 04240

Respondent

**Motion for Extension of Time to File Answer to
Complaint**

EPA Docket No.
TSCA-01-2018-0061

Now comes Respondent, Ahmad Alijabbari (“Respondent”), by and through undersigned counsel, and moves for an Extension of Time to file an Answer, as follows:


Respondent and the United States Environmental Protection Agency, Region I (“EPA”) have reached an agreement in principal to resolve this matter, and a Supplemental Environmental Project (“SEP”) is a part of that agreement. In order to complete the SEP, and therefore the Consent Agreement and Final Order (“CAFO”), the parties need to review and approve a Scope of Work (“SOW”) for the SEP.

Respondent has completed, through an approved agency, lead based paint inspection reports on two qualifying properties, covering multiple units and common space therein. Respondent has also contacted qualified contractors who may perform the abatement work for the SEP to obtain statements and estimates to address the required details for the SOW. Because there are limited qualified contractors operating in and around the Lewiston, Maine area and there is significant demand for their services, additional time is necessary to obtain the details for the SOW and approve the same.

Accordingly, Respondent requests an additional extension of 30 days of the deadline to file an Answer to the Complaint so that the parties can finalize and file the CAFO and SOW, thereby formally resolving this matter.

Counsel for the EPA, Peter DeCambre, consents to this Motion and the requested extension of time.

Dated: April 1, 2019



Shane T. Wright (Maine Bar No. 10014)
Counsel for Respondent
NORMAN, HANSON & DeTROY, LLC
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

IN THE MATTER OF:

Ahmad Alijabbari
5 Saint Tekakwitha Drive
Lewiston, ME 04240

Respondent

Certificate of Service

EPA Docket No.
TSCA-01-2018-0061

I hereby certify that the foregoing Motion for Extension of Time to file Answer to Complaint has been sent to the following persons on the date noted below:

Original and One Copy
(By email and Certified Mail):

Wanda Santiago
Regional Hearing Clerk
U.S. EPA, Region I
5 Post Office Square, Suite 100 (ORA 04-1)
Boston, MA 02109-3912
Santiago.Wanda@epa.gov

Copy
(By email and Certified Mail):

Peter DeCambre
Senior Enforcement Counsel
U.S. EPA, Region I
5 Post Office Square, Suite 100 (OES 4-2)
Boston, MA 02109-3912

Dated: April 1, 2019


Shane T. Wright (Maine Bar No. 10014)
Counsel for Respondent
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

IN THE MATTER OF:

Ahmad Alijabbari
5 Saint Tekakwitha Drive
Lewiston, ME 04240

Respondent

**Order Granting Extension of Time to File
Answer to Complaint**

EPA Docket No.
TSCA-01-2018-0061

Respondent Ahmad Alijabbari has submitted a Motion for Extension of Time to File Answer to Complaint dated April 1, 2019, seeking an additional 30-day extension of time to file an Answer so that the parties may finalize the details of a Supplemental Environmental Project as part of a Consent Agreement and Final Order. The U.S. EPA, Region I has consented to the Motion.

In accordance with 40 C.F.R. §§ 22.7(b) and 22.16(c), for good cause shown, the Respondent is hereby granted the requested extension of time to file an Answer to the Complaint. Accordingly, the deadline to file an Answer is extended May 1, 2019.

So Ordered:

Date:

Regional Judicial Officer