

January 15, 2013

VIA CERTIFIED MAIL - RETURN RECEIPT

Regional Hearing Clerk
Mail Code 6RC-D
US Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: RCRA-06-2013-0902

Dear Sir or Madame:

Enclosed please find TM Chemicals Limited Partnership's Unopposed Motion for Extension of Deadline for Filing an Answer and Requesting a Hearing for filing in the above-referenced matter. Please contact me if you have any questions.

Very truly yours,



Paul C. Sarahan

PCS//pid
Enclosure

FILED

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 6
BEFORE THE ADMINISTRATOR

2013 JAN 17 PM 1:40
REGIONAL HEARING CLERK
EPA REGION VI

IN THE MATTER OF:

TM CHEMICALS LIMITED
PARTNERSHIP

HARRIS COUNTY, TEXAS

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EPA DOCKET NO.
RCRA-06-2013-0902


TM Chemicals Limited Partnership's Unopposed Motion
for Extension of Deadline for Filing an Answer and Requesting a Hearing

COMES NOW, TM Chemicals Limited Partnership ("TM Chemicals") and files its Unopposed Motion for Extension of Deadline for Filing an Answer and Requesting a Hearing, pursuant to 40 C.F.R. § 22.7(b). This Motion is filed for the purpose of facilitating the discussion of a potential resolution of the matter and any necessary follow-up. TM Chemicals and the Environmental Protection Agency ("EPA") have agreed in principle to the terms of an agreement to resolve this matter and are in the process of finalizing the agreement.

To facilitate this work to resolve this matter, TM Chemicals respectfully requests that TM Chemicals' deadline for filing an answer and requesting a hearing in this matter be extended to February 18, 2013. Counsel for TM Chemicals has conferred with counsel for EPA with respect to this Motion and EPA does not oppose this Motion.

Respectfully submitted,

FULBRIGHT & JAWORSKI L.L.P.



PAUL C. SARAHAN

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Attorneys for Respondent,
TM Chemicals Limited Partnership

APPROVED AS TO FORM:



Jonathan Bull
Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 6

Attorneys for Complainant,
U.S. Environmental Protection Agency, Region 6

CERTIFICATE OF SERVICE

I certify that, on January 16, 2013, TM Chemicals Limited Partnership's Unopposed Motion for Extension of Deadline for Filing an Answer and Requesting a Hearing was served by first-class mail and electronic mail to:

Jonathan Bull
Assistant Regional Counsel
Mail Code 6RC-ER
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Regional Hearing Clerk
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PAUL C. SARAHAN