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April 6, 2012

Wanda Santiago
Regional Hearing Clerk
USEPA, Region 1
5 Post Office Square, Suite 100
(Mail Code: ORA18-1)
Boston, MA 02109-3912

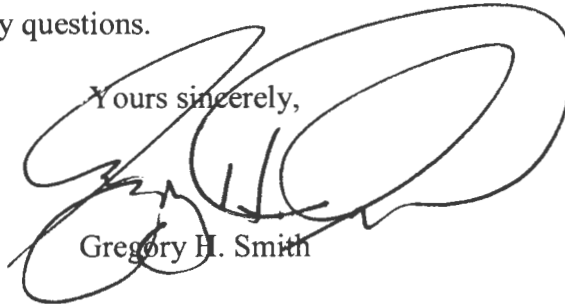
Re: **CSG Holdings, Inc.**
Docket No. CWA-01-2012-0032

Dear Ms. Santiago:

I enclose for filing in the above matter an original and one copy of Respondent CSG Holdings, Inc.'s Motion to Extend Time to Respond to EPA's Complaint and Notice and Opportunity to Request a Hearing. EPA does not object to this Motion.

Please contact me with any questions.

Yours sincerely,



Gregory H. Smith

Enc.

cc: Laura J. Berry, Esq.
Enforcement Counsel

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

IN THE MATTER OF:) Docket No. CWA-01-2012-0032
)
) **RESPONDENT'S MOTION FOR**
CSG HOLDINGS, INC (F/K/A) **EXTENSION OF TIME TO RESPOND**
COLUMBIA SAND & GRAVEL,) **TO EPA'S ADMINISTRATIVE**
INC.)) **COMPLAINT AND NOTICE OF**
COLUMBIA, NH) **OPPORTUNITY TO REQUEST A**
) **HEARING**
)
Respondent.)
)
Proposing to Assess a Civil Penalty)
Under Section 309(g) of the Clean)
Water Act, 33 U.S.C. § 1319(g))

MOTION TO EXTEND TIME TO ANSWER

NOW COMES Respondent, CSG Holdings, Inc. (F/K/A Columbia Sand & Gravel, Inc.), by and through its attorneys, McLane, Graf, Raulerson & Middleton, Professional Association, and pursuant to Consolidated Rules of Practice, 40 C.F.R. Part 22.7(b), hereby moves for an extension of time to file a written request for hearing and an Answer, or otherwise resolve the Administrative Complaint up to and including May 23, 2012. EPA does not object to this Motion. In support of this motion, Respondent states as follows:

1. The undersigned counsel was only recently retained in this matter, subsequent to EPA's issuance of the Complaint at which time the deadline for filing an Answer had already commenced. In addition, undersigned counsel had no prior involvement in any of these matters associated with the allegations in the Complaint.
2. Given the period over which the violations are alleged to have occurred and the relative complexity of the issues, counsel and Respondent will need additional

time to investigate the factual allegations and issues raised in the Complaint to adequately prepare an Answer.

3. An extension will allow for a meaningful opportunity to engage in settlement discussions with EPA that could substantially reduce the expenses of the parties, the time and expense of the Regional Judicial Officer and the Environmental Appeals Board, and lead to a more efficient resolution of this case.

4. No prejudice to any party will result from granting this motion.

WHEREFORE, Respondent CSG Holdings, Inc. respectfully requests:

A. That the period for filing an Answer to the Complaint be extended to May 23, 2012; and

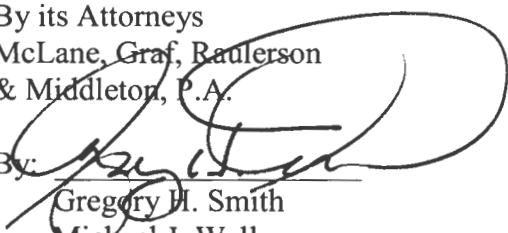
B. For such other and further relief as the judicial officer deems appropriate.

Respectfully submitted,

CSG HOLDINGS, INC.

By its Attorneys
McLane, Graf, Raulerson
& Middleton, P.A.

Dated April 6, 2012

By: 
Gregory H. Smith
Michael J. Walls
Jarrett B. Duncan
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CERTIFICATE OF SERVICE

I hereby certify that on April 6, 2012, I served the foregoing "Motion of for Extension of Time" on the following persons, in the manner specified, on the date below:

Original and one copy by First-Class mail:

Wanda I. Santiago
Regional Hearing Clerk
U.S. EPA, Region 1
5 Post Office Square
Suite 100, (Mail Code: ORA 18-1)
Boston, MA 02109-3912

One copy by First-Class Mail:

Laura J. Berry
Enforcement Counsel
U.S. EPA, Region 1
5 Post Office Square
Suite 100 (Mail Code: OES04-2)
Boston, MA 02109-3912

Dated: April 6, 2012

By: 

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