

KAREN A. MIGNONE - PARTNER ADMITTED IN CT, NJ, NY, RI; NOT ADMITTED IN MA kmignone@verrilldana.com

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December 22, 2010

Wanda I Santiago Regional Hearing Clerk U.S. EPA, Region I 5 Post Office Square, Suite 100 Mail Code ORA18-1 Boston, MA 02109-3912

Re:

In the Matter of Cascades Boxboard Group - Connecticut LLC,

RPA Region I, Docket No. EPCRA-01-2010-0074

Dear Clerk:

Enclosed please find for filing an original and one copy of Cascades Boxboard Group – Connecticut LLC's Third Assented-to Motion to Extend Time for Respondent's Answer and Request for Hearing.

Thank you.

Very truly yours,

Karen A. Mignone

Karen Mynone

KAM/jad Enclosure

cc:

Keith E. Glidden

Christine Foot

Jill Metcalf Ghislain Levesque

Moira A. McCue

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION I

In the Matter of:	
CASCADES BOXBOARD GROUP –) CONNECTICUT LLC) 130 Inland Road) Versailles, CT 06383)	Docket No. EPCRA-01-2010-0074
Respondent.)	

THIRD ASSENTED TO MOTION TO EXTEND TIME FOR RESPONDENT'S ANSWER AND REQUEST FOR HEARING

Respondent Cascades Boxboard Group – Connecticut LLC ("Cascades") hereby moves pursuant to 40 C.F.R. § 22.7 to extend the time for it to file its answer and request a hearing in the above-captioned enforcement action for forty-five (45) days to February 14, 2011.

As grounds and in support of its motion, Cascades states the following:

- Enforcement counsel for the United States Environmental Protection Agency
 ("EPA") has assented to this motion, and agreed to the February 14, 2011 date.
- Cascades was served EPA's Administrative Complaint and Notice of Opportunity for Hearing ("Complaint") in the above-captioned enforcement action on or about September 27, 2010.
- 3. The Regional Judicial Officer allowed Cascades' Second Assented-to Motion to Extend Time for Respondent's Answer and Request for Hearing, dated November 30, 2010, and extended the time for Cascades to answer EPA's Complaint and request a hearing to December 31, 2010.

- 4. Cascades and EPA continue to negotiate a settlement during the last thirty (30) days and believe that an additional forty-five (45) days will allow them to resolve this matter without need for the filing of an answer or holding a hearing.
 - 5. This is the third request for extension of time in this matter.

WHEREFORE, Cascades Boxboard Group – Connecticut LLC respectfully requests that the Regional Judicial Officer

- a) allow the foregoing Third Assented-to Motion; and
- b) extend the time for Cascades Boxboard Group Connecticut LLC to file an answer and request a hearing for forty-five (45) days to February 14, 2011.

Dated: December 22, 2010

Respectfully submitted, CASCADES BOXBOARD GROUP – CONNECTICUT LLC By its attorneys,

Karen A. Mignone

Keith E. Glidden VERRILL DANA, LLP

One Boston Place, Suite 2330

Boston MA 02108 617-309-2600

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of December 2010, I caused the foregoing Assented-To Motion to Extend Time for Respondent's Answer and Request for Hearing has been served by in-hand delivery as follows:

Original and One Copy

Wanda I Santiago Regional Hearing Clerk U.S. EPA, Region I 5 Post Office Square, Suite 100 Mail Code ORA18-1 Boston, MA 02109-3912

Copy

Christine Foot
Enforcement Counsel
Office of Environmental Stewardship
U.S. EPA, Region I
5 Post Office Square, Suite 100
Mail Code OES04-2
Boston, MA 02109-3912

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Jill Metcalf Regional Judicial Officer U.S. EPA, Region I 5 Post Office Square, Suite 100 Mail Code ORA18-1 Boston, MA 02109-3912

Karen A. Mignone