

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 1

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IN THE MATTER OF )

RED SHIELD ACQUISITION LLC )  
(d/b/a/ OLD TOWN FUEL & FIBER) )  
24 Portland Street, P.O. Box 564 )  
Old Town, ME 04468 )

Respondent. )

Proposing to Assess a Civil Penalty Under )  
Sections 309(g) and 311(b)(6) of the Clean )  
Water Act, 33 U.S.C. §§ 1319(g), 1321(b)(6) )


Docket No. CWA-01-2012-0075

**MOTION FOR ENLARGEMENT  
OF TIME TO RESPOND TO  
THE COMPLAINT AND FILE A  
WRITTEN REQUEST FOR A  
HEARING**

Pursuant to 40 C.F.R. §§ 22.7(b) and 22.16, Respondent Red Shield Acquisition LLC, d/b/a Old Town Fuel & Fiber (“Old Town Fuel & Fiber”), by and through its undersigned counsel, hereby files this Motion for Enlargement of Time in which to file a written request for a hearing and reply to the Complaint in the above captioned matter.

United States Environmental Protection Agency (“EPA”) filed the Complaint on August 31, 2012. Respondent received service on September 4, 2012. Since then, EPA and Old Town Fuel & Fiber have scheduled settlement discussions for the afternoon of October 3, 2012, at EPA’s Boston offices. Respondent does not anticipate any objections to this Motion. In order to facilitate settlement discussions, Respondent respectfully requests that the Regional Judicial Officer grant Respondent an enlargement of time until November 5, 2012 to file its Answer to the Complaint and/or Hearing Request.

Dated: September 26, 2012

 (ME 4712) on behalf of  
Joanna B. Tourangeau, Me. Bar No. 9125  
Attorney for Respondent Red Shield

Acquisition LLC, d/b/a Old Town Fuel &  
Fiber

Drummond Woodsum & MacMahon  
84 Marginal Way, Suite 600  
Portland, Maine 04101  
207-772-1941

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REGION 1**

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RED SHIELD ACQUISITION LLC	)	
(d/b/a/ OLD TOWN FUEL & FIBER)	)	
24 Portland Street, P.O. Box 564	)	
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**CERTIFICATE OF SERVICE**

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

Original and one copy,  
By Certified Mail,  
Return Receipt Requested:

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

Copy, by Certified Mail,  
Return Receipt Requested:

Ms. LeAnn Jensen  
Regional Judicial Officer  
U.S. EPA, Region 1  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912

Copy, by Certified Mail,  
Return Receipt Requested:

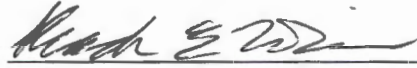
Ms. Laura J. Berry  
Enforcement Counsel  
U.S. EPA, Region 1  
5 Post Office Square, Suite 100 (OES04-2)

Boston, MA 02109-3912

Copy, by Certified Mail,  
Return Receipt Requested:

Mr. Brian Kavanah, Director  
Division of Water Quality Management  
Maine Department of Environmental Protection  
17 State House Station  
Augusta, ME 04333-0017

Dated: September 26, 2012

 (ME 4992) on behalf  
Joanna B. Tourangeau, Me. Bar No. 9125  
Attorney for Respondent Red Shield  
Acquisition LLC, d/b/a Old Town Fuel &  
Fiber

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84 Marginal Way, Suite 600  
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