

DrummondWoodsum

ATTORNEYS AT LAW

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October 31, 2012

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

RE: In the Matter of: Red Shield Acquisition, LLC d/b/a
Old Town Fuel & Fiber, Docket No. CWA-01-2012-
0075

Dear Ms. Santiago:

I have enclosed a Motion for Enlargement of Time and Certificate of Service for filing in regards to the above-referenced matter.

Thank you for your assistance. Please do not hesitate to contact me with any questions or concerns.

Sincerely,



Joanna B. Tourangeau

JBT/al

Enclosures

cc: Laura J. Berry, Enforcement Counsel (Certified Mail)
LeAnn Jensen, Regional Judicial Officer (Certified Mail)
Brian Kavanah, Maine DEP (Certified Mail)
Dick Arnold, Red Shield Acquisition, LLC

anticipate EPA objections to this motion, and is hopeful that settlement will be complete in advance of December 19, 2012.

Dated: October 31, 2012



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

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1**

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)	Docket No. CWA-01-2012-0075
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))	

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)