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April 7, 2011

BY FACSIMILE AND OVERNIGHT MAIL

Ms. Karen Maples, Regional Hearing Clerk
Office of the Regional Hearing Clerk
U.S. Environmental Protection Agency – Region 2
290 Broadway, 16th Floor (1631)
New York, New York 10007-1866

Re: *In the Matter of CWM Chemical Services, LLC*
Docket No. EPCRA-02-2010-4206

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG.II
2011 APR -8 P 2:32
REGIONAL HEARING
CLERK

Dear Ms. Maples:

Enclosed for filing is one original and one copy of Respondent’s Motion to Continue Date for Filing Answer. Please note that the date for filing the answer is currently **April 15, 2011** and we are requesting a sixty-day extension to that date. In light of the potential shutdown of the Federal government, anything that you can do to get this request acted upon by the Regional Judicial Officer immediately would be greatly appreciated.

Thank you for your attention to this matter.

Very truly yours,

Marc J. Goldstein

Enclosures

- cc: Melva J. Hayden, Esq. (by electronic and U.S. mail)
- Gail Lynch, Esq. (by electronic mail)
- Francis Chin, Esq. (by electronic mail)
- Stephen M. Richmond, Esq. (by electronic mail)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

In the Matter of

CWM CHEMICAL SERVICES, LLC,

Respondent,

Proceeding under Section 325(c)
of Title III of the Superfund
Amendments and Reauthorization Act,

Docket No. EPCRA-02-2010-4206

REGIONAL HEARING
CLERK
APR - 8 P 2:32

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG. II

RESPONDENT'S MOTION TO CONTINUE DATE FOR FILING OF ANSWER

The Respondent, CWM Chemical Services, LLC ("CWM"), moves the Regional Judicial Officer ("RJO") for an Order continuing the date for filing its answer from April 15, 2011 to June 15, 2011.

By orders dated October 27, 2010, November 24, 2010, January 18, 2011, and February 14, 2011, the RJO granted the requests of CWM for an extension of the time for CWM to file an answer in the above-captioned matter through April 15, 2011. During that time, CWM has engaged in constructive dialogue with EPA Region 2 staff and counsel, and CWM is awaiting an information request from EPA.

CWM is therefore requesting an additional sixty (60) day extension through June 15, 2011. For each of the prior requests, counsel for EPA has authorized CWM to inform the RJO that EPA concurred with the requested extension. CWM has sought EPA's concurrence for this motion as well and is awaiting a response; however, in light of the potential shutdown of the Federal government, CWM believed it was imperative to file this motion immediately and will update the RJO with EPA's response to its request to concur in this motion.

CWM CHEMICAL SERVICES, LLC
By its attorneys,



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April 7, 2011

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the Respondent's Motion to Continue Date for Filing of Answer to be served by electronic and U.S. mail on April 7, 2011 to:

Melva J. Hayden, Esq.
Assistant Regional Counsel
Region 2 Title VI Coordinator
Office of Regional Counsel
Water & General Law Branch
U.S. EPA Region 2
290 Broadway - Rm. 1626A
New York, New York 10007-1866

