



McLane, Graf,
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Professional Association

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GREGORY H. SMITH
Email: greg.smith@mclane.com
Admitted in NH

August 2, 2012

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

**RE: CSG Holdings, Inc. Complaint and Notice of Opportunity for Hearing
EPA Docket No. CWA-01-2012-0032**

Dear Ms. Santiago:

I enclose an original and one copy of an Assented-to Motion for Fourth Extension of Time to Answer with regard to the above-entitled matter.

Yours sincerely,


Gregory H. Smith

GHS:cb
Enclosure

cc: Laura J. Berry, Esq.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

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

ASSENTED-TO MOTION FOR FOURTH EXTENSION OF TIME TO ANSWER

NOW COMES Respondent, CSG Holdings, Inc., by and through its attorneys, McLane, Graf, Raulerson & Middleton, Professional Association, and hereby moves for a fourth extension of time to file a written request for hearing and an Answer, to September 5, 2012. In support of this motion, Respondent states as follows:

1. On June 12, 2012, the parties filed an Assented- to Motion to Extend the Time to Answer to August 6, 2012.
2. Today the parties reached a settlement in principle. An extension of time is necessary, however, in order to allow the parties the opportunity to complete the settlement documents; granting of this Motion will promote the efficient resolution of this matter.
3. No prejudice to any party will result from granting this motion.
4. All parties assent to this motion.

WHEREFORE, Respondent CSG Holdings, Inc. respectfully requests:

- A. That the period of time for completing the settlement or filing an Answer to the Complaint and Request for a Hearing be extended to September 5, 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: August 2, 2012

By: 

Gregory H. Smith
Michael J. Walls
Jarrett B. Duncan
11 South Main Street
Suite 500
Concord, NH 03301
(603) 230-4401
gsmith@mclane.com

In the matter of CSG Holdings, Inc. Docket No. CWA-01-2012-0032

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2012, I sent the foregoing "Assented-to Motion for Fourth Extension of Time for Respondent to Respond to EPA's Administrative Complaint and Notice of Opportunity to Request a Hearing" to the following persons, in the manner specified, and 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

and via Electronic Mail to:

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

Dated: August 2, 2012

By: 

Gregory H. Smith
11 South Main Street
Suite 500
Concord, NH 03301