

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1  
**RECEIVED**

2012 MAY 14 P 3:10  
Docket No. WA-01-2012-0032

IN THE MATTER OF: )  
)  
CSG HOLDINGS, INC (f/k/a )  
COLUMBIA SAND & GRAVEL, )  
INC.) )  
COLUMBIA, NH )  
)  
Respondent. )  
)  
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 SECOND  
EXTENSION OF TIME FOR  
RESPONDENT TO RESPOND TO EPA'S  
ADMINISTRATIVE COMPLAINT AND  
NOTICE OF OPPORTUNITY TO  
REQUEST A HEARING**

**ASSENTED-TO MOTION FOR SECOND 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 second extension of time to file a written request for hearing and an Answer, to June 22, 2012. In support of this motion, Respondent states as follows:

1. On April 18, 2012, the Regional Judicial Officer granted an extension of time for Respondent to file an Answer by May 23, 2012.
2. The parties are engaged in settlement discussions, are making progress toward resolving this matter, and believe that an extension of time will be useful in advancing these ongoing efforts. An efficient resolution of this matter will reduce time and expense for the parties and this tribunal.
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 for entering into a settlement or filing an Answer to the Complaint be extended to June 22, 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 May 11, 2012

By: 

Gregory H. Smith  
Michael J. Walls  
Jarrett B. Duncan  
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Concord, NH 03301  
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**In the matter of CSG Holdings, Inc. Docket No. CWA-01-2012-0032**

**CERTIFICATE OF SERVICE**

I hereby certify that on May 14, 2012, I sent the foregoing "Assented-to Motion for Second 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:*

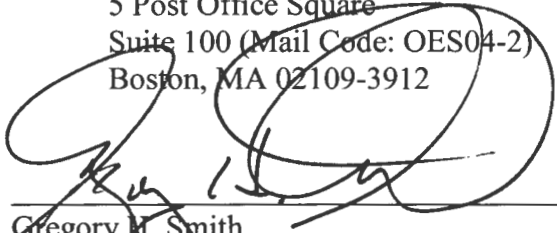
Wanda I. Santiago  
Regional Hearing Clerk  
U.S. EPA, Region 1  
5 Post Office Square  
Suite 100, (Mail Code: ORA 18-1)  
Boston, MA 02109-3912

*and via Electronic Mail to:*

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

Dated: May 14, 2012

By: \_\_\_\_\_

  
Gregory M. Smith  
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