

Stephen M. Richmond 15 Walnut Street, Suite 400 Wellesley, MA 02481-2133 Direct: (781) 416-5710 Fax: (781) 416-5799 srichmond@bdlaw.com

~0

January 5, 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

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 **January 14**, **2011** and we are requesting a thirty day extension to that date.

Thank you for your attention to this matter.

Very truly yours,

Stephen M. Richmond

SMR/maf Enclosures cc: Melva J. Hayden, Esq Gail Lynch, Esq. Francis Chin, Esq.

ress S	2011	ROTEC
ORE ORE	JAN	
	-	A
- N	σ	NCNEN NEHEN
ARING	2	-second
ε <b>ρ</b>	2: 4 º	-REG.JI

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 2

In the Matter of

**CWM CHEMICAL SERVICES, LLC,** 

Respondent,

Docket No. EPCRA-02-2010-4206

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

### **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 January 14, 2011 to February 14, 2011.

By orders dated October 27, 2010 and November 24, 2010, 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 January 14, 2011. During that time, CWM has engaged in constructive dialogue with EPA Region 2 staff and counsel, and the parties have agreed that an additional extension would be useful.

CWM is therefore requesting an additional thirty (30) day extension through February 14, 2011, and counsel for EPA, Ms. Melva Hayden, has authorized CWM to inform the RJO that EPA concurs in this request.

CWM CHEMICAL SERVICES, LLC By its attorneys,

- -

nont

Stephen M. Richmond Marc J. Goldstein BEVERIDGE & DIAMOND, P.C. 15 Walnut Street, Suite 400 Wellesley, Massachusetts 02481 (781) 416-5700 (781) 416-5799 (fax) srichmond@bdlaw.com mgoldstein@bdlaw.com

January 5, 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 January 5, 2011:

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