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September 7, 2012

**BY ELECTRONIC AND U.S. 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  
2012 SEP 12 P 3:29  
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 **September 17, 2012** and we are requesting a 30-day extension to that date to finalize a settlement in principle. EPA has assented to this request.

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

U.S. ENVIRONMENTAL  
PROTECTION AGENCY-REG. II  
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**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 September 17, 2012 to October 17, 2012.

By orders dated October 27, 2010, November 24, 2010, January 18, 2011, February 14, 2011, April 8, 2011, June 6, 2011, August 3, 2011, October 7, 2011, January 10, 2012, March 20, 2012, May 16, 2012, and July 24, 2012, 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 September 17, 2012. During that time, CWM has engaged in constructive dialogue with EPA Region 2 staff and counsel. On April 15, 2012, EPA and CWM agreed to a settlement in principle and requested additional time to complete the settlement.

Counsel for EPA informed CWM's counsel that completion of the settlement had been delayed due to illness of personnel at EPA and authorized CWM to inform the RJO that EPA concurred with a further request for an extension through September 17, 2012. Counsel for EPA has again informed CWM's counsel that the settlement has been delayed due to these same factors and authorized CWM to seek an additional 30-day extension.

CWM is therefore requesting an additional 30-day extension through October 17, 2012 in order to complete the settlement.

CWM CHEMICAL SERVICES, LLC  
By its attorneys,



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September 7, 2012

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 September 7, 2012 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

