Verrill Dana

KEITH E. GLIDDEN ATTORNEY kglidden@verrilldana.com ONE BOSTON PLACE, SUITE 2330 BOSTON, MA 02108 617-309-2600 • FAX 617-309-2601

October 21, 2010

IN-HAND Wanda I Santiago Regional Hearing Clerk U.S. EPA, Region I 5 Post Office Square, Suite 100 Mail Code ORA18-1 Boston, MA 02109-3912

> Re: In the Matter of Cascades Boxboard Group – Connecticut LLC, RPA Region I, Docket No. EPCRA-01-2010-0074

Dear Clerk:

Enclosed please find for filing an original and one copy of Cascades Boxboard Group – Connecticut LLC's Assented-to Motion to Extend Time for Respondent's Answer and Request for Hearing.

Thank you.

Very truly yours Keith E. Glidden -

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Enclosure

cc: Karen A. Mignone Christine Foot Jill Metcalf Ghislain Levesque Moira A. McCue

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION I

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In the Matter of:

CASCADES BOXBOARD GROUP – CONNECTICUT LLC 130 Inland Road Versailles, CT 06383

Docket No. EPCRA-01-2010-0074

Respondent.

## ASSENTED-TO MOTION TO EXTEND TIME FOR RESPONDENT'S ANSWER AND REQUEST FOR HEARING

Respondent Cascades Boxboard Group - Connecticut LLC ("Cascades") hereby moves

pursuant to 40 C.F.R. § 22.7 to extend the time for it to file its answer and request a hearing in

the above-captioned enforcement action for thirty (30) days to November 26, 2010.

As grounds and in support of its motion, Cascades states the following:

1. Enforcement counsel for the United States Environmental Protection Agency

("EPA") has assented to this motion.

2. Cascades was served EPA's Administrative Complaint and Notice of Opportunity

for Hearing in the above-captioned enforcement action on or about September 27, 2010.

3. Cascades and EPA have been negotiating a settlement and believe that an

additional thirty (30) days will allow them to resolve this matter without need for the filing of an answer or holding a hearing.

4. This is the first request for extension of time in this matter.

WHEREFORE, Cascades Boxboard Group - Connecticut LLC respectfully requests that

the Regional Judicial Officer

- a) allow the foregoing Assented-to Motion; and
- b) extend the time for Cascades Boxboard Group Connecticut LLC to file an

answer and request a hearing for thirty (30) days to November 26, 2010.

Dated: October 21, 2010

Respectfully submitted, CASCADES BOXBOARD GROUP – CONNECTICUT LLC By its attorneys,

Karen A. Mignone Keith E. Glidden VERRILL DANA, LLP One Boston Place, Suite 2330 Boston MA 02108 617-309-2600

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 21st day of October 2010, I caused the foregoing Assented-To Motion to Extend Time for Respondent's Answer and Request for Hearing has been served by in-hand delivery as follows:

Original and One Copy Wanda I Santiago Regional Hearing Clerk U.S. EPA, Region I 5 Post Office Square, Suite 100 Mail Code ORA18-1 Boston, MA 02109-3912 Christine Foot Copy Enforcement Counsel Office of Environmental Stewardship U.S. EPA, Region I 5 Post Office Square, Suite 100 Mail Code OES04-2 Boston, MA 02109-3912 Jill Metcalf Copy Regional Judicial Officer U.S. EPA, Region I 5 Post Office Square, Suite 100 Mail Code ORA18-1

Keith E. Glidden

Boston, MA 02109-3912