

March 16, 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 MAR 21 A 10:36
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 **April 17, 2012** and we are requesting a two-month extension to that date. 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-02-2010-006

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG.11
2012 MAR 21 A 10:36
REGIONAL HEARING
CLERK

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 April 17, 2012 to June 18, 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, and January 10, 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 April 17, 2012. During that time, CWM has engaged in constructive dialogue with EPA Region 2 staff and counsel, and CWM is awaiting an information request from EPA. EPA, through its counsel, has informed CWM that it is its intent to discuss this matter with its program clients and managers and to schedule an informal settlement conference prior to the proposed June 18, 2012 date.

CWM is therefore requesting an additional two-month extension through April 17, 2012. Counsel for EPA has authorized CWM to inform the RJO that EPA concurs with the requested extension.

CWM CHEMICAL SERVICES, LLC
By its attorneys,



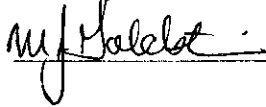
Stephen M. Richmond
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Wellesley, Massachusetts 02481
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(781) 416-5799 (fax)
srichmond@bdlaw.com
mgoldstein@bdlaw.com

March 16, 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 March 16, 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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

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CWM CHEMICAL SERVICES, LLC,

Respondent,

Proceeding under Section 325(c)
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Docket No. EPCRA-02-2010-4206

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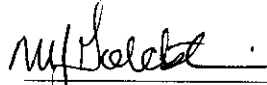
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By its attorneys,



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