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February 8, 2011

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: <u>In the Matter of Cascades Boxboard Group – Connecticut LLC</u>, 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 Fourth Assented-to Motion to Extend Time for Respondent's Answer and Request for Hearing.

Thank you.

Very truly yours,

(anna Mignore

Karen A. Mignone

KAM/jad Enclosure

cc: Keith E. Glidden 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.

FOURTH 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 forty-five (45) days to March 31, 2011.

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, and agreed to the March 31, 2011 date.

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

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

3. The Regional Judicial Officer allowed Cascades' Third Assented-to Motion to Extend Time for Respondent's Answer and Request for Hearing, dated December 22, 2010, and extended the time for Cascades to answer EPA's Complaint and request a hearing to February 14, 2011. 4. Cascades and EPA are working on finalizing the terms for a Supplemental Environmental Program Proposal.

5. Cascades and EPA continue to negotiate a settlement during the last forty-five (45) days and believe that an additional forty-five (45) days will allow them to resolve this matter without need for the filing of an answer or holding a hearing.

WHEREFORE, Cascades Boxboard Group – Connecticut LLC respectfully requests that the Regional Judicial Officer

a) allow the foregoing Fourth Assented-to Motion; and

 extend the time for Cascades Boxboard Group – Connecticut LLC to file an answer and request a hearing for forty-five (45) days to March 31, 2011.

Dated: February 8, 2011

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 8th day of February 2011, 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

Copy

Сору

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 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 Regional Judicial Officer U.S. EPA, Region I 5 Post Office Square, Suite 100 Mail Code ORA18-1 Boston, MA 02109-3912

Keith E. Glidden