



**HANCOCK**  
ESTABROOK, LLP

COUNSELORS AT LAW

**WENDY A. MARSH**  
[wmarsh@hancocklaw.com](mailto:wmarsh@hancocklaw.com)

May 11, 2016

**VIA FEDERAL EXPRESS**

Regional Hearing Clerk  
U.S. Environmental Protection Agency  
290 Broadway – 16<sup>th</sup> Floor (Room 1631)  
New York, NY 10007-1866

U.S. Environmental  
Protection Agency-Reg.  
2016 MAY 12 AM 10:45  
REGIONAL HEARING  
CLERK

**Re: In the Matter of Consolidated Precision Products Corp.  
Docket No. CWA-02-2016-3314**

Dear Sir/Madam:

Enclosed for filing please find an original and two copies of the Respondent's unopposed Motion for Extension of Time to Answer EPA's Administrative Complaint, Findings of Violation, Notice of Proposed Assessment of an Administrative Penalty, and Notice of Opportunity to Request a Hearing in the above-captioned matter.

Please file the Motion and return a file-stamped copy to the undersigned in the enclosed self-addressed, stamped envelope.

Thank you in advance for your assistance.

Very truly yours,

HANCOCK ESTABROOK, LLP

Wendy A. Marsh

WAM/slp

Enclosures

cc: Evans Stamatakis, Esq., Assistant Regional Counsel,  
U.S. Environmental Protection Agency (w/enclosures)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2

IN THE MATTER OF:

Consolidated Precision Products Corp.  
901 East Genesee Street  
Chittenango, New York 13037

Respondent

Proceeding pursuant to Section 309(g) of the Clean  
Water Act, 33 U.S.C. §1319(g)

**PROCEEDING TO ASSESS  
CLASS I CIVIL PENALTY**

**Docket No. CWA-02-2016-3314**

**RESPONDENT'S MOTION FOR EXTENSION OF TIME TO ANSWER EPA'S  
ADMINISTRATIVE COMPLAINT, FINDINGS OF VIOLATION, NOTICE OF  
PROPOSED ASSESSMENT OF AN ADMINISTRATIVE PENALTY, AND NOTICE  
OF OPPORTUNITY TO REQUEST A HEARING**

Pursuant to the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of a Compliance or Correction Action Orders and the Revocation or Termination or Suspension of Permits ("CROP"), 40 C.F.R. Part 22, Respondent, Consolidated Precision Products Corp. ("Consolidated") moves for an extension of time of sixty (60) days within which to file an Answer to the U.S. Environmental Protection Agency's ("EPA") Administrative Complaint, Findings of Violation, Notice of Proposed Assessment of an Administrative Penalty, and Notice of Opportunity to Request a Hearing (the "Complaint"). In support of this Motion, respondent states as follows:

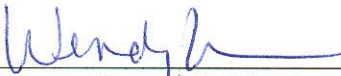
1. This is Respondent's first request for an extension of time in which to Answer the Complaint.

U.S. Environmental  
Protection Agency  
2016 MAY 12 AM 10:45  
REGIONAL HEADQUARTERS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 11th day of May, 2016, a true and correct copy of the foregoing MOTION FOR EXTENSION OF TIME TO ANSWER EPA'S ADMINISTRATIVE COMPLAINT, FINDINGS OF VIOLATION, NOTICE OF PROPOSED ASSESSMENT OF ADMINISTRATIVE PENALTY, AND NOTICE OF OPPORTUNITY TO REQUEST A HEARING was served on the following via Federal Express:

Regional Hearing Clerk  
U.S. Environmental Protection Agency  
290 Broadway – 16<sup>th</sup> Floor (Room 1631)  
New York, New York 10007-1866

  
\_\_\_\_\_  
Wendy A. Marsh