

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1 – NEW ENGLAND**

IN THE MATTER OF

Cold Storage Solutions, Inc.
230 Kenneth Welch Drive
Lakeville, MA 02347

Respondent

Proceeding under Section 113(d) of the Clean Air Act, 42 U.S.C. § 7413(d), and Section 325(c) of the Emergency Planning and Community-Right-to-Know-Act, 42 U.S.C. § 11045(c)

Docket Nos. CAA-01-2013-0061
EPCRA-01-2013-0062

RECEIVED
2013 JAN 23 P 11:40
EPA ORC
OFFICE OF
REGIONAL HEARING CLERK

ASSENTED TO MOTION TO EXTEND TIME TO FILE AN ANSWER

Now comes Respondent, Cold Storage Solutions, Inc. (“CSSI”) and hereby moves, with the assent of the United States Environmental Protection Agency (the “EPA”), to extend the date for CSSI to file its Answer to the EPA’s Administrative Complaint and Notice of Opportunity for Hearing to **March 7, 2014**.

In support of this motion, CSSI states the following:

1. The EPA assents to this motion.
2. The parties are still actively and diligently attempting in good faith to reach an agreed-upon resolution of this action.
3. This extension of time is requested to allow additional time for CSSI and the EPA to further discuss, and hopefully resolve, this matter. An extension is needed, in part, to allow an adequate period for CSSI to collect and provide certain information, and for the EPA to review such information in connection with a possible settlement.
4. No party will be prejudiced by the allowance of this motion and the case’s progress will not be unreasonably delayed.

WHEREFORE, CSSI respectfully requests that its Assented to Motion to Extend Time to File an Answer be allowed.

Respectfully submitted,

COLD STORAGE SOLUTIONS, INC.

By Its Attorneys,

PARTRIDGE SNOW & HAHN, LLP



Robert K. Taylor
Timothy Wenger
128 Union Street, Suite 500
New Bedford, MA 02740
(774) 206-8200
(774) 206-8210 Fax
rkt@psh.com; tdw@psh.com

DATED: January 21, 2014


CERTIFICATES OF SERVICE

I hereby certify that the original and one copy of the foregoing Assented to Motion to Extend Time to File Answer was mailed, postage prepaid, on this 21st day of January, 2014 to the following:

Wanda I. Santiago, Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code ORA 18-1
Boston, MA 02109-3912

I hereby certify that a copy of the foregoing Assented to Motion to Extend Time to File Answer was mailed, postage prepaid, on this 21st day of January, 2014 to the following:

Christine M. Foot, Enforcement Counsel
Office of Environmental Stewardship
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code OES04-2
Boston, MA 02109-3912



Timothy Wenger