



Marc J. Goldstein  
15 Walnut Street, Suite 400  
Wellesley, MA 02481  
Direct: (781) 416-5715  
Fax: (781) 416-5799  
mgoldstein@bdlaw.com

February 4, 2011

U.S. ENVIRONMENTAL  
PROTECTION AGENCY-REG. II  
2011 FEB - 8 A 12: 11  
REGIONAL HEARING  
CLERK

**BY FACSIMILE AND OVERNIGHT 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

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 **February 14, 2011** and we are requesting a sixty-day extension to that date.

Thank you for your attention to this matter.

Very truly yours,

Marc J. Goldstein

Enclosures

cc: Melva J. Hayden, Esq  
Gail Lynch, Esq.  
Francis Chin, Esq.

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-~~426~~ 426

U.S. ENVIRONMENTAL  
PROTECTION AGENCY-REG. II  
2011 FEB - 8 A 12: 11  
REGIONAL JUDICIAL  
CLERK HEARING

**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 February 14, 2011 to April 15, 2011.

By orders dated October 27, 2010, November 24, 2010, and January 18, 2011, 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 February 14, 2011. 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. The parties have agreed that an additional extension would be useful.

CWM is therefore requesting an additional sixty (60) day extension through April 15, 2011, and counsel for EPA, Ms. Melva Hayden, has authorized CWM to inform the RJO that EPA concurs in this request.

CWM CHEMICAL SERVICES, LLC  
By its attorneys,



Stephen M. Richmond  
Marc J. Goldstein  
BEVERIDGE & DIAMOND, P.C.  
15 Walnut Street, Suite 400  
Wellesley, Massachusetts 02481  
(781) 416-5700  
(781) 416-5799 (fax)  
srichmond@bdlaw.com  
mgoldstein@bdlaw.com

February 4, 2011

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 February 4, 2011 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

