

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

IN THE MATTER OF:)
)
)
Cashman Dredging and Marine.) Proceeding to Assess Civil Penalty Under Section
Contracting Co., LLC,) 105(a) of the Marine Protection, Research,
549 South Street) and Sanctuaries Act, 33 U.S.C. § 1415(a)
Quincy, Massachusetts,)
)
) Docket No. MPRSA-01-2015-0035
)
Respondent.)
_____)

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**STATUS REPORT AND
MOTION FOR EXTENSION OF TIME TO FILE
CONSENT AGREEMENT AND FINAL ORDER**

Pursuant to the July 7, 2015 Prehearing Order, and pursuant to 40 C.F.R. §§ 22.7(b) and 22.16, Complainant, with the concurrence of the Respondent, submits this status report regarding settlement, along with a motion requesting an extension of time in which to file a Consent Agreement and Final Order.

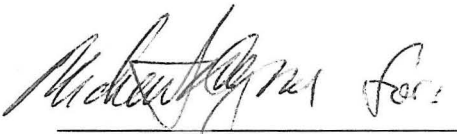
In response to the Prehearing Order requirement that the parties hold a settlement conference by July 24, 2015, the parties' legal counsel have, since that date, had several phone calls. On May 19, 2015, the parties and their legal counsel met to discuss possible settlement. Based on that meeting, and subsequent phone calls, the parties are optimistic that this case will settle, thereby furthering the Environmental Protection Agency ("EPA") policy supporting settlement, and avoiding the unnecessary expenditure of time and financial resources by both the Respondent and the agency.

However, as the parties are negotiating a complex "innovative technology" Supplemental Environmental Project ("SEP") as part of the settlement, and as such SEP, in addition to having

to be negotiated by the parties, also needs to be coordinated and approved by EPA Headquarters, and in light of August vacation schedules, the parties will need a limited amount of additional time in order to finalize settlement, and, therefore, the parties request a delay in which to file a fully-executed Consent Agreement and Final Order, until September 25, 2015.

Pursuant to the Prehearing Order, Complainant has contacted the Respondent's attorney and he has no objection regarding this motion.

Respectfully submitted,



Tonia Bandrowicz
Senior Enforcement Counsel
U.S. EPA, Region 1

7/24/2015
Date

In re: Cashman Dredging and marine Contracting Co., LLC
EPA Docket No. CWA 01-2015-0035

CERTIFICATE OF SERVICE

I, Tonia Bandrowicz, hereby certify that on this 24th day of July, 2015. I caused the foregoing *Status Report* and *Motion for Extension to File Consent Agreement and Final Order* to be served on the following persons in the manner indicated:

Original and One Copy By FedEx or UPS:

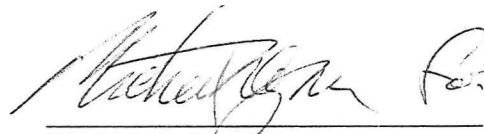
Sybil Anderson,
Headquarters Hearing Clerk
U.S. EPA
Office of Administrative Law Judges
Ronald Reagan Building, Room M1200
1300 Pennsylvania Avenue, NW
Washington, DC 20460

One Copy By Pouch Mail:

The Honorable Susan L. Biro
Chief Administrative Law Judge and Presiding Officer
Office of the Administrative Law Judges
U.S. Environmental Protection Agency
Mail Code 1900L
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

One Copy By FedEx or UPS:

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Tonia Bandrowicz
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EPA Region 1