

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
BEFORE THE ADMINISTRATOR**

In the Matter of:

ISP Freetown Fine Chemicals, Inc.

MAR000009605

Proceeding under Section 3008(a) of the
Resource Conservation and Recovery Act,
42 U.S.C. § 6928(a)

Docket No. RCRA-01-2018-0062

JOINT STATUS REPORT

In its Order Granting Joint Motion For Extension Of Dispositive Motion Deadline in the above captioned matter, dated February 24, 2021, this Tribunal extended the deadline for filing dispositive motions until May 24, 2021, and ordered the parties to submit Joint Status Reports by March 26, 2021, and April 23, 2021, to inform the Tribunal of the parties' efforts towards narrowing the remaining factual disputes. The Parties hereby submit the following status report.

On March 10, 2021, Respondent submitted to Complainant responses to certain information requests Complainant had requested of Respondent. The parties have scheduled, on March 31, 2021, a meeting of their respective expert witnesses for the purpose of identifying areas of agreement and disagreement with respect to technical aspects of the case. In preparation for that meeting, the parties have exchanged proposed stipulations of fact relating to technical details of the processes and equipment at issue in the case, some of which will be topics for the experts' discussion. The parties expect that the meeting of the expert witnesses will lead to a better understanding and narrowing of the issues for the parties' dispositive motions.

DATED: March 26, 2021

[Signatures on following page]

Respectfully submitted,

/s/ Andrea Simpson

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