UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

In the Matter of: ISP Freetown Fine Chemicals, Inc. MAR000009605 Proceeding under Section 3008(a) of the Resource Conservation and Recovery Act, U.S.C. § 6928(a)	Docket No. RCRA-01-2018-0062

JOINT MOTION FOR EXTENSION OF TIME

Pursuant to Rule 22.7(b) of the Consolidated Rules of Practice, 40 C.F.R. § 22.7(b), Respondent ISP Freetown Fine Chemicals, Inc. ("ISP") and Complainant Environmental Protection Agency ("EPA") hereby jointly request an extension of time to file the Partial Consent Agreement/Final Order ("CAFO") until Friday, October 16, 2020. This Tribunal's August 7, 2020 Order on Establishing Filing Deadlines set a deadline of October 2, 2020 to file a fully executed Partial CAFO and a deadline of October 16, 2020 to file a Joint Proposed Plan. Since this Tribunal's August 7 Order, the parties have agreed on the terms of a Partial CAFO and are currently in the process of executing that document. As the final execution – signatures, payments, etc. – can take several days to finalize, EPA and ISP jointly seek a two-week extension so that the deadline to file the Partial CAFO aligns with the deadline to file the Joint Proposed Plan on October 16, 2020.

DATED: October 1, 2020

Respectfully submitted,

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Docket No. RCRA-01-2018-0062

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Joint Motion for Extension of Time was served this 1st day of October 2020 in the following manner on the addressees listed below:

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By OALJ E-Filing System:

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October 1, 2020

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