

**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,
U.S.C. § 6928(a)

Docket No. RCRA-01-2018-0062

JOINT STATUS REPORT

In its Prehearing Order of October 22, 2020, this Tribunal instructed the parties to file a Joint Status Report by November 20, 2020, in which the parties shall describe their “progress toward narrowing the remaining factual disputes for the Tribunal.” *Id.*, at 2. Moreover, this Tribunal required that “[a]ny stipulations of fact upon which the parties have agreed shall be filed as a Joint Set of Stipulated Facts together with the Status Report.” *Id.*

For the past two months, the parties have attempted to reach a stipulation of facts. The Respondent and the Complainant each prepared lengthy proposed stipulations, and then participated in good faith discussions with a goal of developing a robust set of stipulated facts. Unfortunately, the parties were unable to reach agreement on a set of stipulated facts that would narrow the facts in dispute. Nevertheless, these discussions were of use to the parties in better understanding the basis for each other’s claims and planned defenses. Although the parties were unable to reach a stipulation at this time, it remains possible that the parties may agree to certain stipulations as this matter proceeds.

The parties are continuing to prepare for the pre-hearing exchanges as required by the October 22, 2020 Prehearing Order.

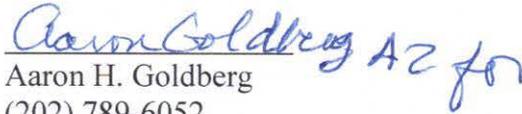
DATED: November 20, 2020

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Joint Status Report was served on this 20th day of November 2020 in the following manner on the addressees listed below:

Copy by e-mail to:

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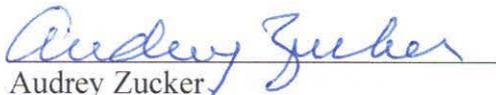
By OALJ E-Filing System:

Mary Angeles, Headquarters Hearing Clerk
U.S. Environmental Protection Agency
Office of Administrative Law Judges
1200 Pennsylvania Ave., NW
Washington, DC 20460

By OALJ E-Filing System:

Christine Coughlin, Administrative Law Judge
U.S. Environmental Protection Agency
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1200 Pennsylvania Ave., NW
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November 20, 2020



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