

# FLAT RATE ENVELOPE

FLAT RATE POSTAGE REGARDLESS OF WEIGHT  
DOMESTIC USE ONLY

FOR PICKUP CALL 1-800-222-1811



UNITED STATES POSTAL SERVICE®

www.usps.com

DOMESTIC USE ONLY  
FLAT RATE PRIORITY MAIL  
POSTAGE REQUIRED

HOW TO USE:



**1. COMPLETE ADDRESS**  
Type or print recipient address and address in customer block or on label (if provided)



**2. PAYMENT METHOD**  
Affix postage or payment method indicated in upper right corner



**3. ATTACH LABEL**  
Remove label back over customer address (white area)

<b>P</b>	<b>\$7.40</b> US POSTAGE	062S0007925853
	PRIORITY MAIL ZONE 1 FLAT-RATE ENVELOPE ComBasPrice	FROM 20036
		stamps endicia 03/13/2021
<b>PRIORITY MAIL 1-DAY™</b>		
ERIC L. KLEIN BEVERIDGE & DIAMOND 1900 N STREET, NW, SUITE 100 WASHINGTON DC 20036		<b>0024</b>
<b>C001</b>		
SHIP TO:	Mary Angeles 7250 Linden Tree Lane Springfield VA 22152-3544	
<b>USPS TRACKING #</b>		
<b>9405 5118 9956 0329 5579 95</b>		

# FLAT RATE ENVELOPE

FLAT RATE POSTAGE REGARDLESS OF WEIGHT  
DOMESTIC USE ONLY

FOR PICKUP CALL 1-800-222-1811



## HOW TO USE:



### 1. COMPLETE ADDRESS

Type or print required address and addressee in customer block or on label (if provided)



### 2. PAYMENT METHOD

Affix postage or meter indicated in upper right corner



### 3. ATTACH LABEL

Remove label backing over customer address (white area)

06250007925853 FROM 20036  
stamps expire 03/13/2021

\$7.40 US POSTAGE  
PRIORITY MAIL  
ZONE 1 FLAT-RATE ENVELOPE  
Certified Mail

**P**

**PRIORITY MAIL 1-DAY™**

0024

ERIC L. KLEIN  
BEVERIDGE & DIAMOND  
1900 N STREET, NW, SUITE 100  
WASHINGTON DC 20036

C001

SHIP Mary Ann

Floppy Disk/CD Mailer

FIRST CLASS MAIL

Supplemental  
PEX - CBI

DO NOT BEND OR FOLD  
AVOID EXPOSURE TO ALL MAGNETIC FIELDS

Floppy Disk/CD Mailer

FIRST CLASS MAIL

Supplemental  
PEX - CBI



**RECEIVED**

By Office of Administrative Law Judges at 2:25 pm, Mar 22, 2021

Eric L. Klein  
155 Federal Street  
Suite 1600  
Boston, MA 02110  
(617) 419-2316  
eklein@bdlaw.com

March 16, 2021

**VIA USPS PRIORITY MAIL**

Mary Angeles, Headquarters Hearing Clerk  
U.S. Environmental Protection Agency  
Office of Administrative Law Judges  
1200 Pennsylvania Ave. NW  
Mail Code 1900R  
Washington, DC 20460

Re: *In the Matter of: ISP Freetown Fine Chemicals, Inc.*  
U.S. EPA Docket No. RCRA-01-2018-0062: Respondent's Supplemental  
Prehearing Exchange

Dear Ms. Angeles:

Enclosed for filing in the above-referenced matter, please find the Supplemental Prehearing Exchange and corresponding exhibits of Respondent ISP Freetown Fine Chemicals Inc. ("ISP"). Many of ISP's exhibits contain Confidential Business Information. Accordingly, redacted versions were filed via the OALJ E-Filing system on March 12, 2021, and unredacted versions are being sent directly to the Hearing Clerk. As outlined in ISP's certificate of service, filing and service methods are consistent with this Tribunal's October 22, 2020 Prehearing Order, including the "Guidance on Use of OALJ E-Filing System" attached to the Order, 40 C.F.R. § 22.5(1)-(3), and 40 C.F.R. § 2.305(g).

In accord with 40 C.F.R. § 22.5(d)(2)-(3) and the Office of Administrative Law Judges' "Privacy Act Statement & Notice of Disclosure of Confidential and Personal Information," ISP hereby submits the unredacted versions of the exhibits accompanying its Prehearing Exchange under seal. The unredacted documents are strictly confidential, and have been marked as such. Additionally, ISP has served, via e-mail, a redacted and unredacted version of its Prehearing Exchange and exhibits on Complainant U.S. Environmental Protection Agency, Region 1.

Both an unredacted and redacted version of ISP's Prehearing Exchange were emailed to Complainant on March 10, 2021. Please do not hesitate to reach out with any questions.

Mary Angeles, Headquarters Hearing Clerk  
U.S. Environmental Protection Agency  
March 16, 2021  
Page 2

Respectfully submitted,

/s/ Eric L. Klein

Eric L. Klein

*Counsel for Respondent  
ISP Freetown Fine Chemicals, Inc.*

Enclosures

cc: Andrea Simpson, Esq.  
Steven Viggiani, Esq.  
*via e-mail*

**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

**RESPONDENT'S SUPPLEMENTAL PREHEARING EXCHANGE**

Respondent ISP Freetown Fine Chemicals Inc. ("ISP"), by undersigned counsel, submits this Supplemental Prehearing Exchange in accordance with the October 22, 2020 Order of this Tribunal.

**Respondent's Supplemental Exhibit List**

<b><u>Exhibit</u></b>	<b><u>Description</u></b>
RX-60	Reactor D-501 and condenser and S-526
RX-61	E-501 condenser
RX-62	E-501 transfer
RX-63	E-501 transfer
RX-64	E-501 transfer into S-526
RX-65	E-502 condenser
RX-66	E-502 transfer into S-502A
RX-67	D-503 and condenser
RX-68	E-503 condenser
RX-69	E-503 transfer
RX-70	E-503 transfer
RX-71	E-503 transfer into S-503A
RX-72	S-503A
RX-73	E-504 condenser
RX-74	E-504 transfer
RX-75	E-504 transfer
RX-76	E-504 transfer into S-545
RX-77	Design drawing for E-501 & E-502 condensers
RX-78	Design drawing for E-501 & E-502 condensers

RX-79 Design drawing for E-503 condenser  
RX-80 Design drawing for E-504 condenser  
RX-81 Design drawing for E-504 condenser  
RX-82 W000-1001  
RX-83 W000-1002  
RX-84 Ethanol iLIMS Data

DATED: March 12, 2021

Respectfully submitted,

/s/ Eric L. Kein

Aaron H. Goldberg  
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Boston, MA 02110

*Counsel for Respondent  
ISP Freetown Fine Chemicals Inc.*

In the Matter of *ISP Freetown Fine Chemicals, Inc.*, Respondent.  
Docket No. RCRA-01-2018-0062

CERTIFICATE OF SERVICE

I hereby certify that a redacted and unredacted version of Respondent ISP Freetown Fine Chemicals Inc.'s ("ISP") Prehearing Exchange was served this 12th day of March, 2021 on this Tribunal and on the 10th day of March, 2021 on the Complainant. The method of service is consistent with the following:

- The Office of Administrative Law Judges' "Guidance on Use of OALJ E-Filing System," attached to this Tribunal's October 22, 2020 Prehearing Order. The Guidance provides that if a party submits confidential business information, "the party shall also file a paper copy of the unredacted version of the document by means other than the OALJ E-Filing System. . . ." Guidance, p.2.
- This Tribunal's October 22, 2020 Prehearing Order, providing on page 7 the location to mail paper files and providing procedures for filing during the COVID-19 national emergency. Prehearing Order, p.7, n.6.
- 40 C.F.R. § 22.5(d)(1)-(3), specifying the production and service methods for both unredacted and redacted versions of filings claimed to contain confidential business information. *See also* 40 C.F.R. § 2.305(g) (procedures for disclosing confidential information under a proceeding brought under the Solid Waste Disposal Act, as amended).

Accordingly, the following specific service methods applied to the redacted, public version of ISP's Prehearing Exchange:

Copy by OALJ E-Filing System to:

Mary Angeles, Headquarters Hearing Clerk  
U.S. Environmental Protection Agency  
Office of Administrative Law Judges  
Ronald Reagan Building, Room M1200  
1300 Pennsylvania Ave. NW  
Washington, DC 20004

Copy by Electronic Mail to Complainant:

Andrea Simpson  
Enforcement Counsel  
U.S. Environmental Protection Agency, Region 1  
Email: simpson.andrea@epa.gov

Steven Viggiani  
Enforcement Counsel  
U.S. Environmental Protection Agency, Region 1  
Email: viggiani.steven@epa.gov

The following specific service methods applied to the unredacted, confidential version of ISP's Prehearing Exchange:

By U.S. Mail to:

Mary Angeles, Headquarters Hearing Clerk  
U.S. Environmental Protection Agency  
Office of Administrative Law Judges  
1200 Pennsylvania Ave. NW  
Mail Code 1900R  
Washington, DC 20460

Copy by Electronic Mail to Complainant:

Andrea Simpson  
Enforcement Counsel  
U.S. Environmental Protection Agency, Region 1  
Email: simpson.andrea@epa.gov

Steven Viggiani  
Enforcement Counsel  
U.S. Environmental Protection Agency, Region 1  
Email: viggiani.steven@epa.gov

/s/ Eric L. Klein

Eric L. Klein  
Counsel for Respondent

Dated: March 12, 2021