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 STATEMENT REGARDING ALTERNATIVE DISPUTE RESOLUTION

Complainant U.S. Environmental Protection Agency ("Complainant") and Respondent ISP Freetown Fine Chemicals, Inc. ("Respondent") submit this Joint Statement regarding Alternative Dispute Resolution ("ADR"), in accordance with this Tribunal's Order to Submit Joint Statement Regarding ADR issued January 29, 2019 ("Order"). Consistent with the instructions in the Order, the parties have conferred and would prefer that a senior attorney from the Office of the Administrative Law Judges ("OALJ") serve as the mediator for this matter. The parties also understand that of the two senior attorneys in the OALJ, Senior Attorney Michael Wright has somewhat more experience with mediation.

For the above state reason, the parties request that Chief Judge Biro appoint Senior Attorney Michael Wright to serve as mediator for this matter.

DATED: February 7, 2020

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Counsel for Respondent ISP Freetown Fine Chemicals, Inc.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Joint Statement Regarding Alternative Dispute

Resolution was served this 7th day of February 2020 in the following manner on the addressees listed below:

Copy by e-mail to:

Attorney for Respondent

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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:

Susan L. Biro, Chief Administrative Law Judge

U.S. Environmental Protection Agency Office of Administrative Law Judges

1200 Pennsylvania Ave., NW Washington, DC 20460

February 7, 2020

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