

**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 MOTION FOR EXTENSION OF TIME FOR FILING DISPOSITIVE  
MOTIONS**

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 request an extension of the deadline to file dispositive motions to March 22, 2021. This Tribunal’s October 22, 2020 Prehearing Order set the deadline for filing dispositive motions on February 22, 2021, 30 days after EPA’s Rebuttal Prehearing Exchange is due.

Currently, the parties are in the midst of the pre-hearing exchange process, pursuant to this Tribunal’s Prehearing Order. Since the EPA’s submission of its Initial Prehearing Exchange, the parties have discussed the scope of documents and witnesses relevant to the parties’ claims. The parties anticipate these discussions to continue following ISP’s submission of its Prehearing Exchange and EPA’s Rebuttal Prehearing Exchange. These discussions may result in further document exchange and potential stipulations, both of which could affect the scope of any dispositive motions. Accordingly, the parties respectfully seek to extend the deadline for filing dispositive motions by 30 days.

DATED: January 14, 2021

/s/ Audrey Zucker

Audrey Zucker  
(617) 918-1788  
zucker.audrey@epa.gov  
Enforcement Counsel  
U.S. Environmental Protection Agency,  
Region 1  
5 Post Office Square  
Suite 100, Mail Code ORC 04-2  
Boston, MA 02109

*Counsel for Complainant  
U.S. Environmental Protection Agency*

Respectfully submitted,

/s/ Eric L. Klein

Aaron H. Goldberg  
(202) 789-6052  
agoldberg@bdlaw.com  
BEVERIDGE & DIAMOND, P.C.  
1350 I Street, N.W., Suite 700  
Washington, D.C. 20005

Eric L. Klein  
(617) 419-2300  
eklein@bdlaw.com  
BEVERIDGE & DIAMOND, P.C.  
155 Federal Street, Suite 1600  
Boston, MA 02110

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