

**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

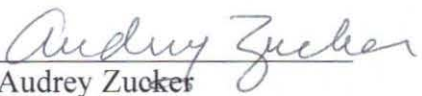
**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR FILING
COMPLAINANT'S REBUTTAL PREHEARING EXCHANGE**

Pursuant to Rule 22.7(b) of the Consolidated Rules of Practice, 40 C.F.R. § 22.7(b), Complainant Environmental Protection Agency ("Complainant") requests an extension of the deadline for filing its Rebuttal Prehearing Exchange ("Rebuttal") to January 27, 2021. This Tribunal's October 22, 2020 Prehearing Order set the deadline for filing Complainant's Rebuttal on January 22, 2021. As grounds for this motion, Complainant states that Respondent's Prehearing Exchange, filed on January 8, 2021, contained numerous documents that Complainant must review with its expert witness prior to filing its Rebuttal. In addition, Monday, January 18, 2021, is a federal holiday, reducing the time for Complainant's preparation of its Rebuttal. Counsel for Respondent have indicated they assent to this motion.

Wherefore, Complainant requests an extension of time until January 27, 2021 for submittal of its Rebuttal.

Respectfully submitted,

Date: 1-15-2021



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

Docket No. RCRA-01-2018-0062

CERTIFICATE OF SERVICE

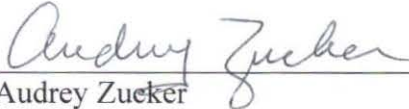
I hereby certify that the foregoing Unopposed Motion for Extension of Time for Filing Complainant's Rebuttal Prehearing Exchange was served on this 15th day of January 2021 in the following manner on the addressees listed below:

Copy by e-mail to: Attorney for Respondent
Eric L. Klein
BEVERIDGE & DIAMOND, P.C.
155 Federal Street, Suite 1600
Boston, MA 02110
eklein@bdlaw.com

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
Office of Administrative Law Judges
1200 Pennsylvania Ave., NW
Washington, DC 20460

January 15, 2021


Audrey Zucker
Region 1
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100 (ORC 04-2)
Boston, MA 02109
Zucker.audrey@epa.gov
Attorney for Complainant