

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

In the Matter of:)

ISP Freetown Fine Chemicals, Inc.)
238 South Main Street)
Assonet, MA 02702-1699)

MAR000009605)

Proceeding under Section 3008(a))
of the Resource Conservation and)
Recovery Act, 42 U.S.C. § 6928(a))

) Docket No. RCRA-01-2018-0062

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**COMPLAINANT'S MOTION FOR EXTENSION
OF TIME TO FILE REPLY TO RESPONDENT'S MOTION TO
DISMISS COUNTS TWO THROUGH EIGHT OF THE COMPLAINT**

Pursuant to Rule 22.7(b) of the Consolidated Rules of Practice, 40 C.F.R. § 22.7(b), Complainant EPA hereby requests an extension of time to July 25, 2019, to file a reply to Motion of Respondent ISP Freetown Fine Chemicals, Inc. to Dismiss Counts Two Through Eight for Failure to State a Claim, and its brief in support of the motion, filed on June 25, 2019.

As grounds therefor, Complainant states as follows:

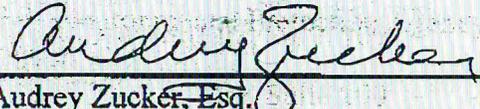
1. Complainant's reply to Respondent's motion to dismiss is due to be filed on July 10, 2019.
2. Complainant needs additional time to respond to Respondent's motion to dismiss due to time lost due to the July 4th holiday and the complexity of the legal issues raised in Respondent's motion.

Based on the foregoing, Complainant requests an extension of time to July 25, 2019, to file its reply to Respondent's motion to dismiss.

Respondent's counsel has indicated that Respondent assents to this motion for extension

of time.

Respectfully submitted,



Audrey Zucker, Esq.
U.S. Environmental Protection Agency
Region 1
5 Post Office Square, Suite 100
Boston, MA 02109

Dated: July 8, 2019

Docket No. RCRA-01-2018-0062

CERTIFICATE OF SERVICE

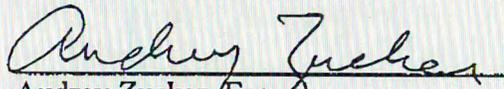
I hereby certify that on July 10, 2019, I served the foregoing Complainant's Motion For Extension of Time to File Reply to Respondent's Motion to Dismiss Counts Two Through Eight of the Complaint in the Matter of ISP Freetown Fine Chemicals, Inc., Docket No. RCRA-01-2018-0062, as set forth below:

By FAX to:

Mary Angeles
Hearing Clerk
U.S. Environmental Protection Agency
Office of Administrative Law Judges
Ronald Reagan Building, Rm. M1200
1300 Pennsylvania Ave., NW
Washington, DC 20004
Fax number: 202-565-0044

Copy by first class and electronic mail to:

Aaron H. Goldberg
Beveridge & Diamond
1350 I Street, N.W., Suite 700
Washington, DC 20005
AGoldberg@bdlaw.com


Audrey Zucker, Esq.
U.S. Environmental Protection Agency
Region 1
5 Post Office Square, Suite 100
Boston, MA 02109

Dated: July 10, 2019

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY****Region 1****5 Post Office Square, Suite 100
Boston, MA 02109-3912****BY FAX**

July 10, 2019

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

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

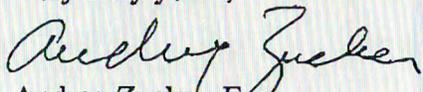
Dear Ms. Angeles:

Enclosed for filing in the above-referenced matter, please find Complainant's Motion For Extension of Time to File Reply to Respondent's Motion to Dismiss Counts Two Through Eight of the Complaint, along with Certificate of Service. Respondent has assented to this extension of time.

Please note that I erroneously filed this Motion with the Regional Hearing Clerk in Boston on July 8, 2019, rather than with the Office of Administrative Law Judges. Today, your office instructed me to re-file the Motion.

Thank you for your assistance in this matter.

Very truly yours,



Audrey Zucker, Esq.

Enclosures

cc: Aaron H. Goldberg, Esq.