PLAINTIFF'S EXHIBIT

UC-2118

UNION CARBIDE

UNION CARBIDE CORPORATION 39 OLD RIDGEBURY ROAD DANBURY, CT 06817
Corporate Health, Safety and Environmental Affairs Department

November 26, 1984

W. H. Joyce - Danbury K-1
D. Liebeskind - Danbury L-1
R. G. Link - Loc. 511

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DEC 0 4 1984
R. G. LINK

Re: Corporate Environmental
Compliance Audit Report

Gentlemen:

Attached is a copy of the final facility compliance audit report from the Corporate environmental compliance audit conducted August 27-30, 1984 at your So. Charleston, WV facility. We want to thank you and your people for the excellent cooperation and the willing participation of your facility personnel. These compliance audits were instructive for all involved, and were successful in providing a good picture of the overall state of environmental complinace within Union Carbide.

Your facility report accompanied the complinace audit report sent to Mr. Anderson and Mr. Flamm. The "Status" column of the report reflects your response to the audit findings. Within the next few weeks we will be contacting your Division Environmental Coordinator regarding these responses. As you are aware, a good faith effort to correct all identified noncomplinace items as promptly as possible is necessary in order to avoid any questions being raised as to willful misconduct. You should not wait for completion of our discussions with your Environmental Coordinator before commencing this task.

If you have questions regarding the attached facility audit report, please contact the undersigned.

W. E. Chambers, Jr.
W. E. Chambers

C. C. Smith, Jr.
C. C. Smith, Jr.

cc: R. L. Foster - Loc. 511

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rcw

UCC 006504

TABLE A
NEWLY IDENTIFIED ITEMS

ITEM NO.	REGULATED ACTIVITY	APPLICABLE LAW REGULATION/ PERMIT, ETC.	COMPLIANCE PROBLEM SUMMARY	DISCOVERY	CURRENT STATUS AS REPORTED BY PLANT
A-4	Unpermitted Discharges (SCWTW) - Taken care of by EPD / DNR	DNR permit 4015	WV permit 4015 which was issued to allow operation of SI II has (inadvertently?) been superceded by June 14th WV 0000078 resulting in unpermitted discharges of methyl chloride, copper, and excess chloride. (Appears to be clerical error on WV's part.)	CAT	Plant made aware of 8/29 and will discuss with the State.
	CLEAN AIR ACT				
A-5	Asbestos Handling - Maintenance - others support - on-going	NESHAP's §112	Improper storage of asbestos from removal demolition projects in plant (broken bags - asbestos exposed and not kept wetted.)	•	Plant is now aware of problem and will take steps to assure complete adherence to plant Asbestos Procedure and EPA requirements.
	RCRA				
A-6	Solid Waste Disposal Fillmont Landfill EPD & Maintenance	WV State Board of Health Chapter 16 Article I	Disposal of prohibited waste at site violates condition 12 of permit dated 12/3/71.	•	Removal of waste completed. Security of area improved mid '84 by locking during off-hours. Plant will up surveillance.
A-7	Solid Waste Disposal Fillmont Landfill EPD	WV State Board of Health Chapter 16 Article I	Area has not been properly vegetated.	•	Plant feels area is basically in compliance with terms of permit.

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Union Carbide trial exhibit UC-2118: W. E. Chambers and C. C. Smith, Jr. to W. H. Joyce, D. Liebeskind and R. G....
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