



UNION CARBIDE CORPORATION  
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

RECEIVED

DEC 04 1984

Re: Corporate Environmental  
Compliance Audit Report

R. G. LINK

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 compliance within Union Carbide.

Your facility report accompanied the compliance 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 noncompliance 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

6244B  
rew

UCC 006504

-2-  
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 (SCMTW)<br><i>- Taken care of by EPD / DNR</i>         | DNR permit 4015                               | WV permit 4015 which was issued to allow operation of SI II has (inadvertently?) been superseded 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.                                                                        |
| <u>CLEAN AIR ACT</u> |                                                                               |                                               |                                                                                                                                                                                                                                                            |           |                                                                                                                                  |
| A-5                  | Asbestos Handling<br><i>- Maintenance<br/>- Others support<br/>- on-going</i> | 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. |
| A-6                  | Solid Waste Disposal Fillmont Landfill<br><i>EPD &amp; Maintenance</i>        | 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<br><i>EPD</i>                          | 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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WV-0204 #67

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FEB 4 1986



ENVIRONMENTAL PROTECTION - SOUTH CHARLESTON PLANT MAINTENANCE DEPT.

February 3, 1986

JRD

SUBJECT: Asbestos

Jim:

About a year and a half ago, a corporate EP audit of 514 was made.

In the opinion of the audit team, the asbestos situation at 514 was serious--asbestos scrap on the ground, deteriorating asbestos insulation not being attended to, etc.

In view of the upcoming corporate EP audit scheduled for the week of March 10, I suggest you review this issue with your staff.

*Jack*  
JLW

JLW:cp  
0396W

Attachment

CC: JAF  
JRS

UCC 006506



INTERNAL  
CORRESPONDENCE

UNION CARBIDE CORPORATION P. O. BOX 8004, SOUTH CHARLESTON, WV 25303  
GLUCONOL AND URETHANE INTERMEDIATES  
SOUTH CHARLESTON PLANT

To: **Attached Distribution** Date: **December 21, 1984**  
From:   
Subject: **Corporate Environmental  
Audit of Plant 514**

Attached is the final report from the Corporate environmental audit, which was conducted in August.

While we generally received good marks on the audit, areas were found which need attention. Bill Joyce has made a commitment to Corporate HS&EA and to Corporate Law that we will correct these deficiencies and do what we said we would do in the "Response" column of the Audit Report.

Jack Worstell has been in contact with a number of the departments and functions in the plant to recommend some specific actions which must be taken. Some deficiencies have, in fact, been corrected and other have actions well underway. Other issues will require further interpretation of regulations.

I expect that you will take corrective action as required to bring us into compliance with the regulations. Jack Worstell will require status feedback from you every six months in order to track progress of these corrections.

This document is for your own personal use only.

R. G. Link

RGL/ph

Attachment

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