

CAF
CORPORATION



Interoffice Correspondence

To: S.J. STERNEN
Location: Wayne, New Jersey
From: H.L. ROSEBROUGH
Location: Erie, 18th Street

Date: October 8, 1979
cc: T. DeGroot
T. Fuller
R.F. McCarthy

Subject: NEWSCOPE-FIRMS MUST REPORT HAZARDOUS SPILLS

Does this apply to us?

- asbestos defined as "hazardous"?
- we dump into the city sewer, which after treatment flows into Lake Erie.

Newscope

Firms must report hazardous spills

After an 18-month delay stemming from a successful industry court challenge, rules on reporting spills of some 299 hazardous substances into navigable waterways went into effect Sept. 28. The Environmental Protection Agency regulations—nearly seven years in the making—link the substances by "reportable" quantities, ranging from as little as 1 lb to 5,000 lb. Companies must report spills of specified quantities to the U. S. Coast Guard. Failure to report can result in civil penalties of \$50,000 per discharge—\$250,000 if the discharge is determined to be the result of "willful negligence." The regulations, under Section 311 of the Water Pollution Control Act, do not govern leaks from waste-disposal sites, the target of current legislative and regulatory efforts. The rules also don't apply to facilities governed by National Pollutant Discharge Elimination System permits or to dredge-and-fill material.

MICH08696

PLAINTIFF'S
EXHIBIT
WV-11732

PLAINTIFF'S
EXHIBIT
12141.0