National Starch and Chemical Corporation

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 15, 1983

Mr. Ron Wilson
Freedom of Information Officer
U. S. Environmental Protection Agency
Region IV
345 Courtland Street, N. E.
Atlanta, GA 30365

Re: Medley Site
Gaffney, South Carolina

Dear Mr. Wilson:

This is to request, pursuant to the Freedom of Information Act, 5 USC 552, that we be allowed to inspect and copy all public records pertaining to the above site which are in the possession of Region IV, U. S. EPA.

In connection with the above site, we have received a letter dated October 25, 1983 from the Director, Air and Waste Management Division, Region IV EPA requesting certain information and documents in our files relating to the Chas. S. Tanner Company ("CST"). We are in the process of piecing together such information as we can but are hindered by the fact that any connection that CST may have had with this site would have been during a time period in the early 1970's which is when we understand this site was in operation. National Starch and Chemical Corporation acquired CST in 1980 from Ciba-Geigy Corporation, and Ciba-Geigy did not acquire CST until 1975, so this task is especially difficult. Accordingly, this request is made to facilitate our response to EPA, as well as to assess the potential liability, if any, of National and our predecessors in interest to CST.

By way of illustration, the types of records we would like to review include, but are not limited to: (1) any and all records obtained from the Medley's regarding the waste received at the site (e.g., records reflecting the nature of the waste, the type of waste, dates received, and quantities; invoices; etc.); (2) records relating to the disposal firm contracted by EPA to clean up the site, indicating (i) tests results of samples of waste, (ii) location and method of disposal, (iii) identification of generators which may indicate specific quantities and types of waste generated (iv) condition of the site

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prior to the clean up, (v) steps taken to clean up the site and costs associated with each such step or activity; (3) records submitted by other potentially liable parties in response to EPA's request for such records; (4) records of DHEC or other state or local agencies containing any of the above information or information relating to the nature of the "emergency" which prompted the EPA clean up; and (5) any other records or documents reflecting EPA inspections of the site, site evaluations, efforts taken by EPA to identify and notify potentially responsible parties, and any other records, which contain any information of the nature described in items (1) through (4) above.

Rather than have EPA copy and send us these documents, we would be willing to visit EPA's Region IV headquarters and review the materials that are discoverable under the Freedom of Information Act and to designate those which we would like copied.

By copy of this letter, we are requesting of Jim Bykott that the time within which we are required to respond to EPA's October 25 letter be delayed until a reasonable period of time after we have had a chance to review the records requested herein.

Very truly yours,

NATIONAL STARCH AND CHEMICAL CORPORATION

A. M. Samson, Jr.
Associate Counsel

AMS:KS

cc: Jim Bykott, Esq., Region IV, EPA