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St. Louis County Facilities

Company Information:

The Boeing Company in St. Louis County, Missouri employs approximately 19,000 people directly, and purchases parts and services from a host of other local employers.

Founded as McDonnell Aircraft Corporation in 1939, the St. Louis facilities focus primarily on design, manufacture, and support of fighter aircraft and manufacture of military transport aircraft components. Boeing products manufactured in St. Louis are deployed throughout the world by the United States Armed Services and Allies.

Risk Management Planning

The United States Environmental Protection Agency (EPA) issued a regulation called Risk Management Program (RMP), as required by an amendment to the Clean Air Act. The RMP rule requires facilities with certain quantities of chemicals specifically listed by EPA to disclose particular information. The EPA list includes 140 chemicals that trigger a requirement for Risk Management Planning and reporting, if stored or used in a process in quantities or concentrations greater than the regulatory threshold. Boeing does not store or use any chemicals on the RMP list at levels above the regulatory threshold.

Boeing in St. Louis County uses the following chemicals named in the RMP list:

- Hydrofluoric acid
- Nitric acid
- Hydrochloric acid
- Propane
- Compressed Natural Gas (contains methane, ethane, and propane).
- Anhydrous ammonia

However, none of these are stored or used above the minimum quantity and concentration regulated by the RMP rule.

Because of the low quantities and concentrations of chemicals from the RMP list onsite, Boeing facilities in Missouri are not subject to the RMP rule. The facilities are, however, subject to a General Duty clause of the Clean Air Act. The General Duty clause requires Boeing to identify hazards, prevent releases, and minimize the consequences of accidental releases, regardless of RMP thresholds. Boeing's risk management program for hazardous chemicals is described on the following page.

The RMP rule requires reporting of certain accidental releases from processes subject to the rule. Boeing-St. Louis had no accidental releases in the last five years that would be reportable under the RMP rule.

Year	1994	1995	1996	1997	1998
Number of RMP Releases	0	0	0	0	0

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General Duty Risk Management Program for Boeing, St. Louis County

Minimization of Quantities Stored/Concentrations Used

Propane, an RMP-listed substance, is used at the Boeing facility in St. Louis County. It is stored in three separate locations in compressed gas tanks. Each propane tank has a capacity less than one-tenth as large as EPA's proposed RMP fuel threshold quantity. Compressed natural gas is used at two locations. The storage capacity at each location is only one-fortieth as large as EPA's proposed RMP threshold quantity.

Anhydrous ammonia, an RMP listed substance, is used at two locations in St. Louis County. The ammonia is stored in compressed gas tanks. These tanks have a capacity only one fourth as large as the RMP threshold quantity.

Some of the hydrofluoric acid used in St. Louis County is received as a 70% solution, above the RMP concentration threshold, but Boeing minimizes the amount in storage at each process to a quantity less than the RMP quantity threshold. When hydrofluoric acid is introduced to the metal finishing process tanks, it is diluted to a concentration well below the RMP threshold. Acids such as nitric and hydrochloric are received at concentrations below the RMP threshold and are further diluted for use. Acids at lower concentrations pose lesser hazards.

Non-RMP fuels and chemicals are stored at Boeing St. Louis, but on-site storage quantities are minimized through just-in-time delivery of bulk fuels/chemicals, and a Chemical Management Services organization that delivers small quantities of chemicals to end users two or three times a week. By minimizing quantities of hazardous materials stored, the possibility and severity of any incident is reduced, and the possibility of a release affecting adjacent Boeing operations or off-site persons is also diminished.

Spill Containment

Storage tanks, process tanks, and bulk containers of liquid fuels/chemicals are located within permanent spill containment structures, including double-wall tanks, containment pits, dedicated tanks for overflow, berms, curbs, and portable containment buildings.

Inspections of Fuel and Chemical Storage

In addition to electronic monitors and alarms on leak-detection systems, fuel and chemical storage areas are visually inspected on a recorded schedule. The inspection schedule requires a visual check on a daily to quarterly basis, depending on the particular area.

Prevention and Response Procedures, Training

The Spill Prevention and Response Plan for Boeing St. Louis and St. Charles facilities describes spill prevention measures, response and reporting procedures, spill response equipment stored on site, and measures to mitigate the impact of an incident. Employee training and coordination with outside first-responders are based on this Plan. The entire Boeing Fire Department and approximately 25 safety, health, and environmental professionals receive 40 hours of intensive training under the OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) rule. Approximately 60 pipefitters and other material handlers are provided with 24 hours of HAZWOPER training. The Boeing Fire and Security departments are trained in release mitigation, isolation, and evacuation procedures. Boeing is also in regular contact with nearby municipal authorities and the Local Emergency Planning Committee, to ensure a coordinated response to any incident.

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