RHÔNE-POULENC

Rhône-Poulenc Ag Company St. Louis Plant Information

The Rhône-Poulenc Ag Company St. Louis Plant is located in the City of St. Louis on the west bank of the Mississippi River. The facility formulates and packages crop protection products used by farmers to enhance agricultural output. Presently the plant employs twenty-four full-time employees and purchases parts and services from a host of other local suppliers.

The facility was built in 1979 by Union Carbide Agricultural Products, Inc.. In 1986, Rhône-Poulenc acquired the company and has been operating at the St. Louis location since.

The site has an excellent safety record, having operated for ten (10) years since it last had a Lost Work Day Case.

Risk Management Planning

The Environmental Protection Agency (EPA) created a regulation called Risk Management Plan (RMP) as required by an amendment to the Clean Air Act. The RMP rule requires facilities with certain quantities of chemicals and other regulated substances on a specific EPA list to disclose certain information. The EPA list includes chemicals that trigger a requirement for Risk Management Planning and reporting, if stored or used in a process in quantities or concentrations greater than a regulatory threshold.

Presently Rhône-Poulenc Ag Company St. Louis Plant uses the following chemicals named in the RMP list:

- Propane
- Acetylene

These chemicals are stored or used at levels well below these regulatory thresholds.

Because of the low quantities and concentrations of chemicals from the RMP list on-site, Rhône-Poulenc Ag Company St. Louis Plant is not subject to the RMP rule. Nonetheless, the Rhône-Poulenc Ag Company St. Louis Plant does manage an active Risk Management Program. Rhône-Poulenc Ag Company St. Louis Plant's Risk Management Program for all hazardous chemicals is described on the following page.

Rhône-Poulenc Ag Company St. Louis Plant had no accidental releases in the last five years that would be reportable under the RMP rule, if the St. Louis Plant were subject to the rule.

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

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Risk Management Program
for
Rhône-Poulenc Ag Company St. Louis Plant

Minimization of Quantities Stored
Propane, an RMP-listed flammable substance is used at the Rhône-Poulenc Ag Company St. Louis Plant. Presently, propane is received in small portable tanks and is used to operate LP forklifts. Quantities stored on site are well below the RMP threshold quantity.

Acetylene, an RMP-listed flammable substance is used at the Rhône-Poulenc Ag Company St. Louis Plant. Acetylene cylinders are used for welding. Quantities stored on site are well below the RMP threshold quantity.

Spill Containment
All large storage tanks, process tanks and bulk containers that contain chemicals are located in agrichemical secondary containment structures that meet the requirements of the Missouri Clean Water Law.

Inspection of Chemical Storage
Chemical storage areas are visually inspected on each shift. The inspection operating procedure requires a visual check which is routinely conducted, as scheduled.

Prevention and Emergency Response Procedures and Training
The Spill Prevention and Response Plan for Rhône-Poulenc Ag Company St. Louis Plant 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 local emergency responders are based on this Plan. The Rhône-Poulenc Ag Company St. Louis Plant provides and updates chemical emergency response training for facility personnel..

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