LAPORTE

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Company Information:

Laporte Pigments, Inc. (formerly Mapico, Inc.) owns and operates a manufacturing facility in St. Louis, Missouri that produces iron oxide pigments of various types and colors from inorganic raw materials. Iron oxide pigments are the largest volume color pigments used. They are commonly found in paints, and colored concrete products as well as colored plastics, paper, inks and cosmetics. More specialized properties are required for applications such as toners for copiers, printers, photographic chemicals and catalysts. The facility, which is located at 303 East Hoffmeister Avenue in south St. Louis County, has been producing pigments at this location for more than 34 years. There are 100 full time employees, many of whom are also residents of the surrounding south St. Louis community.

Risk Management Planning (RMP)

The Environmental Protection Agency (EPA) created a regulation called Risk Management Program (RMP) as an amendment to the Clean Air Act. The RMP rule requires facilities with certain quantities of chemicals and other regulated substances that are on a specific EPA list to disclose information on accidental releases of the listed materials. Specifically, facilities are to provide the following information: a five-year history of accidental releases for their listed materials, "worst case" and "alternative case" scenarios related to potential releases of the listed materials, their plans to prevent and minimize the effect of incidents, and their emergency response programs for dealing with an accidental release should one occur.

Anhydrous ammonia and aqueous ammonia are two of the chemicals listed in the EPA's RMP rule. Laporte Pigments uses these two chemicals in amounts that exceed the EPA-designated threshold quantities and is, therefore, subject to requirements of the RMP rule.

According to the RMP rule, the accidental release history must include all accidental releases from covered processes that resulted in death, injuries, significant property damage, evacuations, shelter-in-place or environmental damage. The following is the five-year accident history for covered RMP-listed materials at this site:

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

Management's policy for safety in the work place is to integrate safety into all of the facility's day-to-day operations and to continuously seek and implement safety improvements. Our success in this regard can be best demonstrated by our historical record of injury and illnesses cases that are reported annually to the Occupational Safety and Health Administration (OSHA). The average for the past five years has been approximately 3.5 cases per 100 full time employees (FTEs), including only 1.7 cases per 100 FTEs in 1998. For the most recent OSHA year of record (1997), these values compare to 6.5 cases per 100 FTEs for the pigment industry and for the overall chemical industry of 4.8 cases per 100 FTEs. Laporte Pigments has one of the best safety records in our industry and is proud of it.

Since anhydrous and aqueous ammonia are both toxic materials, the RMP requires Laporte Pigments to develop a worst-case scenario for one of these two chemicals and a separate alternative-case scenario for each of the two chemicals. The table on the back side of this sheet provides information on these worst-case and alternative-case scenarios. The table also provides information about each chemical and the measures that Laporte Pigments has in place to prevent accidental releases and, should one occur, to effectively respond by implementing planned emergency procedures designed to reduce the effect of the accidental release.

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Example RMP accidental release scenarios for the Laporte Pigments, Inc. St. Louis facility.

The RMP rule defines the worst case release as the hypothetical and entire release of the largest quantity container of the RMP-listed material within 10 minutes. It assumes weather conditions that would maximize its impact, complete failure of all safety controls and systems, and no emergency response. Because the worst-case accidental release scenarios are extremely unlikely, the RMP rule also provides for development of an alternative release scenario. Alternative release scenarios depict a more credible release of an RMP-listed material and consider safety systems that are in place.

Chemical	About the Chemical	Accident Prevention Measures In-Place	Example Event	Scenario	RMP Designated Distance of Concern[1]	Emergency Response Measures Laporte Pigments has in place
Anhydrous Ammonia	➢ Ammonia is a colorless gas that is a strong alkali and has an extremely pungent odor. It is flammable at concentrations of 16 to 25% in air. It is stored as a liquid by compression. ➢ Laporte Pigments uses anhydrous ammonia for pH control in its processes.	➢ Anhydrous ammonia is stored in industry-standard steel storage tanks equipped with automatic overfill protection with alarms. ➢ Tanks are filled to no more than 80% of capacity. ➢ Personnel are trained to safely handle anhydrous ammonia.	Worst-Case Release Example[2]	➢ Instantaneous failure of storage vessel wall. ➢ Total release of the entire contents (124,000 pounds) in 10 minutes. ➢ Worst possible weather conditions. ➢ No mitigating measures in effect.	3. 6 miles	➢ Remotely controlled emergency shut-off valves ➢ Trained emergency responders. ➢ In-plant emergency notification system. ➢ Procedures for communication with off-site responders and residents. ➢ Response drills.
Anhydrous Ammonia	➢ Description is the same as given above for worst-case scenario	➢ Measures are the same as stated above for worst-case scenario	Alternative Case Release Example	➢ Failure of gasket on a system component. ➢ Release of 212 pounds in 10 minutes. ➢ Assumes no mitigating measures are in effect.	0.1 miles	➢ All emergency measures same as listed above for worst case scenario
Aqueous Ammonia	➢ Aqueous ammonia is a clear, colorless solution of water and no more than 44% ammonia that has a very pungent odor. ➢ Laporte Pigments mixes part of its anhydrous ammonia with water to make a 28% solution of aqueous ammonia for use as a process reactant.	➢ Aqueous ammonia is stored in an industry-standard steel tank equipped with automatic overfill protection with alarms. ➢ Tank is filled to no more than 75% of capacity. ➢ Personnel are trained to safely handle aqueous ammonia.	Alternative Case Release Example	➢ Failure of pump packing. ➢ Release of 295 pounds of aqueous ammonia in 10 minutes. ➢ Assumes no mitigating measures are in effect.	0.1 miles	➢ Containment dike with a capacity that is 30% greater than that of the aqueous ammonia storage tank. ➢ All other emergency measures same as listed above for anhydrous ammonia

(1) The distance a toxic vapor cloud, fire, or explosion from an accidental release is predicted to travel before dissipating to the point that serious injuries from short-term exposures will no longer occur. Data developed by EPA or EPA-approved computer models were used to simulate conditions and predict the reported distances.

(2) For RMP, a toxic chemical is one defined by EPA as acutely toxic, meaning it can cause serious health effects or death from short-term exposure.

The sharing of this information is intended to improve community understanding of local industries and promote an informed dialogue on their chemical accident prevention practices. It is not a prediction of the probability that any scenarios discussed will ever occur. The information is based upon the Risk Management Plan being prepared by the Laporte Pigments, Inc. St. Louis facility. Descriptions in the final Risk Management Plan submitted in June, 1999 may differ from these descriptions due to revisions.

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