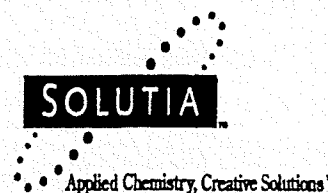


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Solutia Inc. – Carondelet Plant

Company Information

Solutia Inc. is a new company, but one that draws on a century's worth of success in applied chemistry. Solutia officially launched as an independent business in 1997, when it was spun off from Monsanto. Solutia owns and operates 19 manufacturing plants in North America and Europe, employing about 8,800 people worldwide.

Solutia - Carondelet Plant occupies approximately 20 acres in the south St. Louis community of Carondelet and employs just over 200 people. Information on the industrialization of this site dates back to 1870, with Monsanto Company assuming ownership of the plant in 1935. The Carondelet Plant manufactures phosphoric acid and phosphate salts. Most of the products produced here are used as food ingredients. Phosphoric acid produced is used in carbonated beverages to provide flavor and improve storage stability. Several of the phosphates produced are used by baking companies as leavening agents in their products. For meats, poultry, and seafood, phosphates retain proteins and natural fluids, and improve color, texture, and flavor. Phosphates are also used to control bacteria in poultry and E. coli in meats. The balance of phosphoric acid and phosphate salts produced at Carondelet are used for industrial and institutional applications.

Risk Management Planning

The United States Environmental Protection Agency (EPA) created 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 and other regulated substances on a specific EPA list to disclose certain 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 a regulatory threshold. Solutia - Carondelet Plant does not store or use in a process any chemicals on the RMP list at levels above the regulatory threshold.

Solutia - Carondelet Plant uses or produces the following chemicals named in the RMP list:

- Hydrochloric Acid
- Phosphine
- Hydrogen Sulfide
- Sulfur Dioxide

However, none of these chemicals are stored or used above the minimum quantity and concentration that would make the Solutia - Carondelet Plant subject to the RMP rule.

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

The RMP rule requires reporting of certain accidental releases from processes subject to the rule. Solutia - Carondelet had no accidental releases in the last five years that would be reportable under the RMP rule, if the facility was subject to the 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 Solutia – Carondelet Plant

Minimization of Quantities Stored

Hydrogen sulfide, phosphine, and sulfur dioxide gases are not stored as separate chemicals at the Carondelet Plant. Hydrogen sulfide is generated as a by-product of the reaction of sodium hydrosulfide with phosphoric acid, and may be present in small amounts in much of the phosphoric acid manufacturing equipment. Phosphine may be generated in a reaction of phosphorus with metal impurities found with the elemental phosphorus and again may be present in small amounts in any equipment that comes into contact with the raw elemental phosphorus. Sulfur dioxide may be generated in the combustion chamber during phosphoric acid production. All of these are RMP listed substances; however, since they are all generated in quantities far below the regulatory thresholds, none of these are RMP covered processes.

Hydrochloric acid is used at the Carondelet Plant as a wastewater treatment chemical. However, the concentration at which the hydrochloric acid is stored and used is below the RMP regulatory threshold; therefore, this process is also not covered under RMP requirements.

Non-RMP fuels and chemicals are stored at Solutia - Carondelet, but on-site storage quantities are minimized through just-in-time delivery, careful inventory control and routine bulk storage inspection. By minimizing quantities of hazardous materials stored, the possibility and severity of any incident is reduced, and the possibility of a release affecting adjacent Solutia - Carondelet operations or off-site persons is also diminished.

Spill Containment

Many storage tanks of liquid chemicals are located within permanent spill containment structures, including berms, curbs, and dikes. Additionally, bulk liquid storage tanks are equipped with alarms and controls to help ensure against overfilling.

Inspections of Fuel and Chemical Storage

In addition to electronic monitors and alarms, liquid chemical storage areas are visually inspected on a recorded schedule. The inspection schedule requires a visual check on a routine basis. All storage vessels are subjected to routine physical testing and internal inspection to monitor potential corrosion and ensure continued vessel integrity.

Prevention and Response Procedures, Training

The "Chemical Spill Control and Countermeasure Plan" and "Emergency Response Plan" for Solutia – Carondelet Plant describes spill response and reporting procedures and measures to mitigate the impact of an incident. Employee awareness training and coordination with outside first-responders are based on these plans. All Solutia - Carondelet employees receive annual refresher, which includes among other things a review of the Emergency Response Plan. Solutia - Carondelet Plant conducts annual emergency response exercises with the St. Louis Fire Department, St. Louis Police Department and the City Emergency Management Agency to ensure a coordinated response to any incident.

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