DRAFT

New

EPA Risk Management Program
Plant Questions & Answers

1Q. What is the "worst case" scenario for your plant?

1A. EPA defines a "worst-case" release as the release of the largest quantity of a regulated substance from a vessel or process line failure that results in the greatest distance to an endpoint. (Explain your site's "worst case" as defined by EPA and how your site works to prevent an emergency from occurring.)

2Q. Is this the worst thing that could happen at your plant?

2A. (Be prepared to discuss release potential, as well as safeguards to prevent releases and plans for emergency response.)

(EXAMPLE: One of the most hazardous materials we use at this plant is chlorine, which is a raw material for products that are used in mothballs, tires and motor oil additives. You probably know chlorine best as the chemical used to purify drinking water and swimming pools. If chlorine gas escapes it can be irritating or, if it's concentrated enough, it would be poisonous.

To prevent accidental release of chlorine we follow extensive safety procedures in handling the material. In addition to that, we have containment equipment that would operate in the event of a problem.

The best protection system is prevention. That is why we have reduced the quantity of chlorine we store on site, which limits the size of any release. We also store the chlorine in the same tank cars used to ship it here. This means there's no additional handling until we use it, and it also means that our on-site inventory is kept in smaller, separate containers.)

3Q. What's the most hazardous material you deal with at this plant?

3A. (Be prepared to discuss materials on site, how they're used and handled – but remember that competitors will be listening. Product backgrounders should be available for these already; more will be developed if needed.)

4Q. Which raw materials and products are considered toxic or flammable?

4A. (Be prepared to discuss materials on site, how they are used and handled, but also discuss safeguards to prevent incidents, as well as emergency preparedness.)

DSW 138192

STLCOPCB4038149

5Q. Are there less toxic or flammable alternatives?

5A. Solutia continually evaluates alternatives and looks for ways to reduce the quantity and use of hazardous materials. (Provide any examples where your site has changed a process or reduced the quantity of the chemical in order to reduce risk of exposure.)

6Q. Why haven't you told us about these risk earlier?

Solutia has policy of openness with the community. We have discussed these issues with our local fire departments, police, our medical staff and the local emergency planning committee, as well as community leaders. (Describe other methods of outreach and education through a community advisory panel, open houses, education in the schools, etc.)

7Q. In a "worst case" situation, could your plant cause serious harm to people nearby?

7A. By definition, a "worst case" scenario is one of the least likely situations you can imagine. But, if several different safety systems were to fail at once, there could be a serious incident... and no one is more concerned about preventing that than we are. In the event of a serious situation, the people affected first may well be the ones right here in the plant. And many Solutia employees and their families live near the plant.

Safety is our highest priority. And, in a very real sense, our own lives depend on it.

8Q. Have you ever had bad accident at your plant?

8A. Under the EPA's RMP rule, we are required to give a five-year history of accidental releases. As our record shows, accidental releases are relatively uncommon – and the ones we have had have been minor. Our goal is to minimize any impact, and have no incidents. We want to keep the chemicals in the equipment. (Provide specific information about your plant's release history. If there has been a release(s), explain the mechanisms put in place to prevent this from happening in the future.)

9Q. If a serious accident were to occur, is your plant and the community ready to handle it?

9A. We take many steps to ensure that each plant has appropriate plans and procedures for responding to potential catastrophes. To test the adequacy of these plans, we regularly conduct disaster drills involving plant employees – and where possible, local emergency officers and members of the community.

Each drill is preceded by months of planning and coordination. A detailed, written procedure outlines the mock event, as well as objectives and contingency plans. Such drills give employees and emergency responders an opportunity to test whether

DSW 138193

STLCOPCB4038150

employees understand emergency shut-down procedures; whether plans adequately account for people in the plant; and other critical factors for minimizing the impact of a catastrophic event. Afterwards, Solutia employees conduct debriefings, allowing participants to report observations and make suggestions for improvements.

While disaster drills and other safety measures cannot guarantee that a worst-case scenario will never occur, they do give us a valuable opportunity to check and double-check our emergency procedures. This is the best way we know to ensure that our plants — and the communities where they operate — are well prepared to minimize damage in the unlikely event of a major catastrophe.

10Q. How safe is it to work at your plant?

10A. Safety is the number one priority for Solutia plants. Injury rates at Solutia are well below the industry average. Our plant is an OSHA Voluntary Protection Program Star plant, which recognizes us as among the "best of the best" in safety.

11Q. What is the health record of your employees?

11A. (Provide an explanation of your health record and that your site monitors employee health closely.)

12Q. How many of your employees have died of cancer?

12A. Solutia annually conducts epidemiological studies of our employees. (Be prepared to explain the results of any recent studies.)

13Q. Have any of your employees every died while working at your plant?

13A. (Explain any fatalities that occurred and why. Also, describe the preventive measures that were put in place to ensure it never happened again.)

14Q. How do you get the toxic and flammable materials in and out of your plant?

14A. (Explain the methods of transportation used to ship materials at your site. Also describe protective measures used to help ensure that materials are loaded and unloaded without incident.)

15Q. If there is an accident while a chemical is being shipped, who is at fault?

15A. We fully investigate any accident involving the transportation of materials to and from a Solutia plant. Solutia takes transportation safety very seriously. We have an extensive program to evaluate all carriers who transport the chemicals we use and manufacture. Just like in our manufacturing processes, our objective is prevention.

DSW 138194

STLCOPCB4038151

16Q. What are you doing to reduce the potential for chemical spills during the transport of chemicals from your plants to another location?

16A. We take a number a steps to ensure that our raw materials, finished products and wastes are transported safely. Before any chemicals are shipped to or leave our plant, we conduct detailed transportation risk assessments. We consider the relative safety of the mode of transportation (rail, truck, barge); accident rates on a variety of transportation routes; population density along the routes; and the design of packaging and transportation equipment. In addition to these risk assessments, we regularly audit all transportation carriers and perform pre-trip equipment inspections. We also routinely follow inclement weather procedures.

###

DSW 138195

STLCOPCB4038152