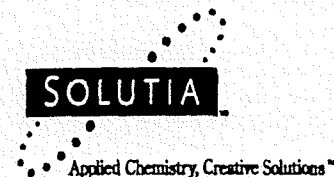


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## Solutia Inc. – John F. Queeny Plant

### Company Information

Solutia Inc. is a relatively new company, but one that draws on a century's worth of success in applied chemistry. Solutia officially opened for business in 1997, when it was spun off from Monsanto, a company which traces its roots directly to the founding of the Queeny Plant in 1901. Solutia owns and operates 19 manufacturing plants in North America and Europe and employs about 8,800 people worldwide.

Solutia – Queeny Plant occupies about 52 acres in the Soulard area of St. Louis. The Queeny Plant employs about 100 people for the manufacturing of L-Aspartic Acid, a key raw material for the artificial sweetener NutraSweet® Skydrol®, the world's leading brand of fluids for aircraft hydraulic systems; Duralink®, a chemical used to make rubber products more stable under heat; and, maleic anhydride briquettes, used to make synthetic resins for the paint, varnish and agricultural chemicals industries and as an intermediate for making dyes.

### 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 - Queeny Plant does not store or use in a process any chemicals on the RMP list at levels above the regulatory threshold.

Solutia - Queeny Plant uses the following chemicals named in the RMP list:

- Anhydrous ammonia
- Ammonium hydroxide

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

Because of the low quantities and concentrations of chemicals from the RMP list onsite, Solutia - Queeny facility 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 - Queeny to identify hazards, prevent releases, and minimize the consequences of accidental releases, regardless of RMP thresholds. Solutia - Queeny'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 -- Queeny 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    |

## **General Duty Risk Management Program for Solutia – Queeny Plant**

### **Minimization of Quantities Stored**

Anhydrous ammonia, an RMP listed substance, is brought to Solutia – Queeny, however, it is converted to ammonium hydroxide at the time of unloading. This unloading activity is covered under DOT requirements and therefore is not an RMP covered process.

Ammonium hydroxide is used at Queeny in two places: central waste treatment and L-Aspartic Acid production. However, the concentration at which the ammonium hydroxide is stored and used is below the RMP regulatory threshold. Therefore, these processes are also not covered under RMP requirements.

Non-RMP fuels and chemicals are stored at Solutia – Queeny, 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 – Queeny 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 high level alarms and controls to help ensure against overfilling. As a final protection, the total site waste water system can be captured and stored to prevent any major spilled liquid from reaching off site locations through the sewer system.

### **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 – Queeny Plant describe 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 – Queeny employees receive annual refresher training under the OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) rule, which includes among other things a review of the Emergency Response Plan. Solutia – Queeny 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.