file: Krummrich

St. Louis Title III data
1993 to 1994
Questions about changes

KRUMMRICH

Q: Reported transfer of Ammonia to the POTW in 1994 increased by more than three and a half times, up 11,000 pounds in 1994, what accounts for that increase?

A: The increase in reported transfer of ammonia to the POTW is the result of the change in reporting requirements allowed by the EPA. This change in the reporting method results in higher numbers for aqueous ammonia at the Krummrich plant.

2Q: Off-site treatment of aniline were reduced by more than 15 percent, down from 76,000 pounds in 1993 to 64,000 pounds in 1993. What accounts for that drop?

2A: Off-site treatment of aniline was reduced by 12,000 pounds due to improved aniline usage within the 4DPA unit.

3Q: Off-site treatment of benzene went up from 48,000 to 201,000 pounds from 1993 to '94. What caused this?

3A: The increase is the result of two things. First, 1994 numbers reflect improved accuracy in the calculation methods for benzene. Second, a one-time transfer of 110,000 pounds benzene contaminated with methyl isobutyl ketone (MIBK) account for the primary increase over 1993 numbers.

4Q: Off-site treatment of chlorobenzene (MCB) increased by 18,000 pounds, from 77,000 pounds in 1993 to 95,000 pounds in 1994. What accounts for that change?

4A: Because of increased production levels, there was an increase of stabilizer residue waste containing chlorobenzene.

5Q: Off-site treatment of 1, 4-dichlorobenzene increased by 11,000 pounds, from 43,000 pounds in 1993 to 54,000 pounds in 1994. What caused this?

5A: Because of increased production levels, there was an increase of stabilizer residue waste containing 1, 4- dichlorobenzene.

6Q: Hydrochloric acid air emissions decreased 20,000 pounds, down from 469,000 pounds in 1993. Any reason?

6A: The decrease can be attributed to improved usage and recovery of hydrochloric acid in plant processes.

7Q: What caused transfer of hydrochloric acid to the POTW to drop by almost 10 percent

(down 1,240,000 pounds from 15,240,000 in 1993)?

7A: Improved recovery of hydrochloric acid from processes that were subsequently sold account for the drop in transfer of hydrochloric acid to the POTW.

8Q: Transfer of methyl ethyl ketone to the POTW increased about 45 percent, up from 50,000 pounds in 1993 to 72,000 pounds in 1994. Why is that?

8A: The increased transfer of methyl ethyl ketone is a result of an approximately equal increase (40 percent) in production of Santoflex 44, which uses the chemical.

9Q: Off-site treatment of methyl isobutyl ketone increased by 28,000 pounds. What accounts for such an increase?

9A: The increase in the methyl isobutyl ketone residue produced is due to poorer usages of the chemical in the production process.

10Q: Off-site treatment of 2-nitrophenol and 4-nitrophenol both decreased by about 50 percent, why is that?

10A: Both decreases are a result of improved accuracy in the calculation methods used in 1994.

11Q: Air emissions of xylene increased 27 percent from 1993 to 1994. What caused this increase?

11A: The increase is a result of poorer usage of xylene within the 4NDPA unit.

12Q: Off-site treatment of xylene increased 23,000 pounds, up to 40,000 pounds in 1994 from 17,000 pounds in 1993. Why the increase?

12A: The increase is a result of poorer usage of xylene within the 4NDPA unit.

CARONDOLET

13Q: The Carondolet Plant continued to perform exceptionally well in terms of TRI releases in 1994, again having 0 pounds of air emissions. However, total reportable wastes in 1994 were up 73.5% from 17,000 pounds in 1993 to 29,500 pounds in 1994, why is that, and why is that not reflected in air, transfer or off-site release numbers?

13A: In 1994, the significant change is a result of increased reporting for releases of phosphoric acid -- which is a trace material that is a part of Arsenic sludge disposal -- tracked as releases into dikes or onto concrete that are then cleaned up and disposed of properly. These releases increased from 15,000 pounds in 1993 to 27,000 pounds in 1994 in part due to improved tracking methods and tighter measurement of materials management. These numbers are reported in a separate category called "Other

Disposal" in accordance with EPA reporting practices. No other significant changes occurred.

QUEENY

14Q: Reported transfer of Ammonia to the POTW in 1994 decreased by more than 20 percent, down 440,000 pounds from 1993 numbers, what accounts for that drop?

A: The decrease in reported transfer of ammonia to the POTW is the result of the change in reporting requirements allowed by the EPA, which delisted certain ammonia salts, requiring that only 10 percent of the ammonia portion of ammonium sulfate be reported. In past years, Monsanto has appeared on the EPA's list of top polluters due in large part to our generation of high volume, low toxicity wastes such ammonia. All chemicals on the EPA's Toxic Release Inventory are treated equally so a pound of relatively innocuous chemical salts is counted the same as a pound of a carcinogen. This misleading accounting has pressured manufacturers, including Monsanto, to reduce low toxicity wastes to drive the big numbers down -- resources which would be better used to reduce more hazardous waste streams. The agency recently agreed with Monsanto and other petitioners by delisting ammonia, which dropped reportable wastes significantly from 1993 levels.

15Q: The numbers for 1994 indicate the elimination of all off-site treatment of aniline, why is that?

15A: The decrease in off-site treatment of aniline is due to the fact that Queeny is no longer running the process that used aniline as a reactant.

16Q: Off-site treatment of maleic anhydride almost completely fell away from 22,000 pounds in 1993 to just 2,000 pounds in 1994. What caused this?

16A: Maleic anhydride releases decreased due to the sale of the maleic anhydride briquetting operation to Huntsman Specialty Chemicals Corporation in 1994.

17Q: Reported off-site treatment of 4-nitrophenol increased 16 percent, up from 154,000 pounds in 1993 to 180,000 pounds in 1994. What caused this?

17A: The increase is primarily due to an increase in total production of finished goods which use 4-nitrophenol as a constituent in the production process. The Queeny plant is in the process of starting a major capital improvement project within this particular manufacturing operation. In the long term, the improvements will have an overall net reduction in environmental releases, releases of 4-nitrophenol.