



# Annual Performance Report

OMB No. 2010-0032  
Expiration Date: 06/30/03

**Facility Name:** Monsanto Company - Luling, LA Facility  
**Performance Track ID #:** A060012  
**Annual Performance Report #:** 1  
**Reporting Year:** 2001  
**Due Date:** 07/01/2002

## Section A. General Facility Information

Please supply or revise information in A.1 – A.8 as is necessary to ensure that it is accurate, complete, and up-to-date. Items A.9 and A.10 cannot be pre-completed; please respond as directed in A.9 and A.10 below.

**A.1 Name of your facility:** Monsanto Company - Luling, LA Facility

**A.2 Name of your parent company:** Monsanto Company

**A.3 Facility contact person for the Performance Track program:**

**Name:** Mr. William Rhodes PE

**Title:** Manufacturing Technologist

**Phone:** (985) 785-3866

**Fax:** (985) 785-3346

**E-mail:** william.c.rhodes@monsanto.com

**A.4 Facility's location**

**Street Address:** 12501 River Road

**Address (cont.):**

**City:** Luling

**State:** LA

**Zip Code:** 70070

**A.5 Facility's Website address (if any):**

**A.6 Number of employees (full-time equivalents) who currently work in the facility:**

500-1000

**A.7 Does your company meet the Small Business Administration definition of a small business for your sector?**

No

**A.8 North American Industrial Classification System (NAICS) Code(s) that are used to classify business at the facility:**

32532 325199 325188 325412

**A.9 In your application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any (additional) changes to your facility's list of products and/or activities? If so, please list them here:**

No

**A.10 Please update the list of environmental requirements that apply to your facility by listing any changes that have taken place during this reporting period. If you have no changes to report, please enter "No changes".**

No changes.

**Section B.  
Environmental Management System**

**B.1 Environmental Management System Assessment. Please summarize EMS assessments conducted *during the year*.**

a. Was an EMS audit or other assessment done by an independent third party?

No

If yes, please provide the type (e.g., ISO 14001 certification), the scope, and the dates (mo/yr) of each assessment.

Type	Scope	Dates (mo/yr)

b. Was an internal or corporate EMS audit conducted? Yes

If yes, please provide the scope and dates (mo/yr) of each audit.

Scope	Date (mo/yr)
Self-assessment and general update of the site's EMS.	09/2001
Corporate assessment of the site's EMS.	10/2001

c. Was a compliance audit conducted?

Yes

If yes, please provide the scope and the dates (mo/yr) of each audit, and indicate who conducted the audit(s) (e.g., facility staff, corporate groups, third party).

Scope	Dates	Who conducted the audit
Comprehensive multimedia compliance audit.	10/2001	Corporate audit team

d. (Optional) If you would like to describe any other audits or inspections that were conducted at your facility, please do so here.

e. Briefly summarize corrective actions taken and other improvements made as a result of your EMS assessments and compliance audit

As a result of the EMS assessment, the facility has completed a formal review of significant environmental aspects and associated targets, and implemented an improved management review of the EMS. Furthermore, as a result of the compliance audit, minor revisions were made to selected environmental management systems to enhance our compliance assurance.

f. Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?

No such instances identified

If no, please explain your plans to correct these instances.

g. When was the last Senior Management review of your EMS completed?

05/2002

Who headed the review? Name: Mr. William C. Rhodes Title: Manufacturing Technologist

**B.2 ISO 14001 Certification. Is your facility currently certified to ISO 14001?**

No

**B.3 Environmental Aspects Identification. When did your facility last conduct a systematic identification and/or review of your environmental aspects?**

04/2002

**B.4 Progress Toward Achieving Objectives and Targets.** In the table below, please provide a narrative summary of progress made toward EMS objectives and targets. You may limit the summary to environmental aspects that are *significant* and towards which progress has been made during the *reporting year*. In cases where *progress* relates specifically to a Performance Track performance commitment, complete the Environmental Aspect column, but in the *Progress* column simply refer to the performance commitment tables in Section C, i.e. "See Section C."

<i>Environmental Aspect</i>	<i>Progress Made This Year (e.g., quantitative or qualitative improvements, activities conducted)</i>
Total Water Use	See Section C.
Hazardous Materials Use	See Section C.
Total Materials Use	See Section C.
Total Solid Waste	See Section C.
Total Materials Use	A series of process improvements throughout all of our manufacturing facilities resulted in a reduction of total materials use of 40.9 million lbs in 2001. Of this total, 35.6 million lbs comprised hazardous materials.
Recycled / Re-Used Materials Use	An additional 4.2 million lbs of hydrochloric acid was recovered for re-use at another facility through process improvements that assured adherence to the customer's quality specifications.

**Section C.  
Environmental Performance Commitments**

Please use the tables below to summarize your facility's environmental performance against your Performance Track performance commitments. Complete only those boxes related to the baseline, current year, and performance commitment.

**C.1 Performance Commitment 1**

a. Use this table to report data related to your first performance commitment.

<b>Category:</b>	<b>Water Use</b>				
<b>Aspect :</b>	<b>Total Water Use</b>				
	<b>Aspect Specifics (Optional):</b>				
	<b>Baseline (as stated in your application)</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Performance Commitment (the goal stated in your application)</b>
<b>Calendar Year</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2003</b>
<b>Actual Quantity (per year)</b>	<b>64100000</b>	<b>46000000</b>			<b>Optional:</b>
<b>Measurement Units</b>	<b>gallons</b>				
<b>Normalizing Factor</b>	<b>1.0</b>	<b>0.995</b>			<b>Optional:</b>
<b>Basis for your Normalizing Factor</b>	<b>Sodium Hydroxide Use</b>				
<b>Normalized Quantity* (per year)</b>	<b>64100000</b>	<b>46231155.8</b>			<b>35200000</b>
<b>*Calculated for you</b>					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

We receive sodium hydroxide at a concentration of 50%, and dilute it for process purposes. Previously, it was diluted to a concentration of 22%; we now dilute it to a concentration of 30%, thus reducing the amount of dilution water needed. This project was completed in the second quarter of 2001.

If you have additional information that you would like to include please attach it here:

Any attachments will be located at the end of the report.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).

N/A

**C.2 Performance Commitment 2**

a. Use this table to report data related to your second performance commitment.

<b>Category :</b>	<b>Materials Use</b>				
<b>Aspect :</b>	<b>Hazardous Materials Use</b>				
	<b>Aspect Specifics (Optional):</b>				
	<b>Baseline (as stated in your application)</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Performance Commitment (the goal stated in your application)</b>
<b>Calendar Year</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2003</b>
<b>Actual Quantity (per year)</b>	<b>5770000</b>	<b>2850000</b>			<b>Optional:</b>
<b>Measurement Units</b>	<b>lbs</b>				
<b>Normalizing Factor</b>	<b>1.0</b>	<b>0.741</b>			<b>Optional:</b>
<b>Basis for your Normalizing Factor</b>	<b>Feed to biological wastewater treatment unit</b>				
<b>Normalized Quantity* (per year)</b>	<b>5770000</b>	<b>3846153.8</b>			<b>4980000</b>
<b>*Calculated for you</b>					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

We achieved this reduction by reducing the pH setpoint for feedwater to our biological wastewater treatment unit, while still maintaining proper treatment capabilities. This feedwater has a relatively low pH; thus reducing the pH setpoint results in a reduction of sodium hydroxide usage.

**Attach:**

Any attachments will be located at the end of the report.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).

N/A

**C.3 Performance Commitment 3**

a. Use this table to report data related to your third performance commitment.

<b>Category :</b>	<b>Materials Use</b>				
<b>Aspect :</b>	<b>Total Materials Use</b>				
	<b>Aspect Specifics (Optional):</b>				
	<b>Baseline (as stated in your application)</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Performance Commitment (the goal stated in your application)</b>
<b>Calendar Year</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2003</b>
<b>Actual Quantity (per year)</b>	<b>284400000</b>	<b>279500000</b>			<b>Optional:</b>
<b>Measurement Units</b>	<b>lbs</b>				
<b>Normalizing Factor</b>	<b>1.0</b>	<b>0.996</b>			<b>Optional:</b>
<b>Basis for your Normalizing Factor</b>	<b>Production of finished product</b>				
<b>Normalized Quantity* (per year)</b>	<b>284400000</b>	<b>280622490</b>			<b>282800000</b>
<b>*Calculated for you</b>					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

We achieved this reduction in raw material consumption by optimizing our process to improve product yields.

Attach:

Any attachments will be located at the end of the report.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).

N/A

**C.4 Performance Commitment 4**

a. Use this table to report data related to your fourth performance commitment.

<b>Category :</b>	<b>Waste</b>				
<b>Aspect :</b>	<b>Total Solid Waste</b>				
	<b>Aspect Specifics (Optional):</b>				
	<b>Baseline (as stated in your application)</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Performance Commitment (the goal stated in your application)</b>
<b>Calendar Year</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2003</b>
<b>Actual Quantity (per year)</b>	<b>2063</b>	<b>0</b>			<b>Optional:</b>
<b>Measurement Units</b>	<b>tons</b>				
<b>Normalizing Factor</b>	<b>1.0</b>	<b>0.741</b>			<b>Optional:</b>
<b>Basis for your Normalizing Factor</b>	<b>Feed to biological wastewater treatment unit</b>				
<b>Normalized Quantity* (per year)</b>	<b>2063</b>	<b>0</b>			<b>0</b>
<b>*Calculated for you</b>					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

We achieved this reduction by beneficially applying our biological wastewater treatment facility's waste solids to land onsite, rather than shipping it off-site for disposal. Our onsite application yields a hay crop, and is conducted under the terms of a Louisiana Department of Environmental Quality Beneficial Use Permit.

**Attach:**

Any attachments will be located at the end of the report.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).

N/A.





**Section D.  
Public Outreach and Performance Reporting**

**D.1 Please briefly summarize the public outreach and reporting activities that your facility has conducted during the year. Feel free, but not obligated, to attach supporting materials (e.g., meeting agendas, public announcements).**

Our public outreach and reporting activities are conducted at both local and corporate levels. Locally, we meet with our Community Advisory Panel bimonthly and have participated in a wide variety of public outreach efforts, as described in our Performance Track application. At a corporate level, Monsanto publishes an annual Sustainability / Environmental Safety & Health report ([www.monsanto.com](http://www.monsanto.com)) that provides a comprehensive overview of our environmental performance and public outreach activities.

Specific to Performance Track, Monsanto has publicized its participation in the program via articles in local newspapers, and as key contributors to articles in trade and regulatory agency publications, as well as via a presentation at the 2001 VPPPA conference.

**Attachment:**

Any attachments will be located at the end of the report.

**D.2 Please indicate which of the following methods your facility plans to use to make its Performance Track Annual Report available to the public. Please check as many as appropriate.**

Community Advisory Panel

URL:

**Section E.  
Self-Certification of Continued Program Participation**

On behalf of **Monsanto Company - Luling, LA Facility,**  
(name of my facility)

I certify that

- I have read and agree to the terms and conditions as specified in the *National Environmental Performance Track Program Guide*. This facility, to the best of my knowledge, continues to meet all program criteria;
  
- I have personally examined and am familiar with the information contained in this Annual Performance Report. The information contained in this report is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete;
  
- My facility has an environmental management system (EMS), as defined in the Performance Track EMS criteria, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
  
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements; and the facility has corrected all identified instances of potential or actual noncompliance;
  
- Based on the foregoing compliance assessments and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environment Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior manager with responsibility for the facility and am fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program.

Signature/Date

Printed Name

Mr. Roy A. Breaud, Jr.

Title

Plant Manager

Phone Number

(985) 785-8211

E-mail Address

william.c.rhodes@monsanto.com

Facility Name

Monsanto Company - Luling, LA Facility

Facility Street Address

12501 River Road

Luling, LA 70070

Performance Track ID#

A060012

**Appendix:****Do you want to add Appendix?****When adding additional comments, please refer to question number.****Comments:****Attachment:**

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Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.