

Attachment 2

Environmental Performance

Performance History

The Goldschmidt Janesville site has had a longstanding commitment to environmental performance. As a facility that began chemical manufacturing almost 50 years ago, the plant has undergone many changes and improvements. However, the past few years have brought about some of the most significant improvements with regard to environmental protection. In 2002, the Janesville plant formed a team to evaluate its wastewater generation in an attempt to reduce the contaminant loading of its wastewater. Since then, through various process changes, the wastewater contaminant loading has decreased by 30%. In 2005, Goldschmidt invested nearly one million dollars to install an emissions scrubber that has reduced its air emissions of two hazardous air pollutants by more than 99%. Furthermore, the plant made major upgrades to the storage tank farm's secondary containment as well as its wastewater pretreatment plant containment in 2005. These are just a few examples of the programs and projects that Goldschmidt has implemented to improve its environmental performance in the recent past.

The Goldschmidt Janesville facility has an Environmental Management System that was certified to the ISO 14001 standard in 2002. In addition, the site was certified to the American Chemistry Council Technical Specification Responsible Care® 14001 in 2005. With the implementation of its environmental management system, Goldschmidt has made continual improvements in its policies and procedures to achieve a level above and beyond compliance. Goldschmidt has devoted ample resources to maintain and improve the plant's infrastructure and environmental performance. Some of the policies and procedures that have been implemented and improved include:

- Pollution Prevention and Control Program
- Waste Management Program
- Waste Minimization Program
- Community Awareness and Emergency Response Program
- Environmental Monitoring and Measurement Program
- Compliance Evaluation Program
- Product Stewardship Program
- Industrial Hygiene Program
- Contractor Environmental Training and Selection Program

Goldschmidt periodically reviews and updates these policies and procedures not only to ensure regulatory compliance as a minimum standard, but also to assure continual improvement in its environmental performance.

Baseline Assessment

An environmental aspects and impacts analysis is conducted annually to identify the environmental aspects of Goldschmidt's activities, products, and services that can be controlled or influenced. This analysis considers the following areas:

- Air emissions
- Water
- Waste
- Energy
- Transportation
- Production and storage areas
- Emergency response
- Responsible Care®
- Other local environmental and community issues
- Physical, chemical, biological, and nuclear hazards
- Natural disasters
- Ergonomics
- Security

During the most recent aspects and impacts review, three environmental objectives were identified. For the purpose of the Green Tier program, Goldschmidt will measure these objectives against calendar year 2004 performance. Following is a summary of the objectives followed by a detailed description.

Summary of Objectives

Objective	Baseline (2004)	Target
Methyl Chloride Stack Emissions	27,506 lb/year	Reduce methyl chloride stack emissions by 95% by 12/31/08.
Natural Gas Consumption	113,152 Dkthm/year	Reduce natural gas consumption by 10% by 12/31/06.
Wastewater BOD Loading	533,295 lb/year	Reduce wastewater BOD by 55% by 12/31/07.

Methyl Chloride Stack Emissions

Since methyl chloride comprises more than 90% of the Goldschmidt Janesville facility's hazardous air pollutant (HAP) emissions, reducing these air emissions will greatly improve the facility's environmental performance. Goldschmidt has approved a \$2.3 MM project to reduce methyl chloride emissions. The project involves the installation of a cryogenic condensation unit that is designed to recover $\geq 95\%$ of the methyl chloride captured in the emissions control equipment. The installation is projected to be complete and the unit in operation in 2nd quarter 2007. Therefore, emission reductions will be realized in 2008.

Natural Gas Consumption

The Goldschmidt Janesville site operates two natural gas fired boilers with maximum continuous heat inputs of 27.5 MMBtu/hr and 46.3 MMBtu/hr. In 2004, the plant consumed 113,152 Dkthm of natural gas. Through various projects and operational changes, Goldschmidt intends to optimize the efficiency of these boilers and reduce the plant's natural gas usage by at least 10% by 12/31/06, measured against the 2004 baseline.

Wastewater BOD Loading

Goldschmidt operates a wastewater pretreatment plant that discharges to the City of Janesville sanitary sewer system and then on to the wastewater utility. The wastewater is contaminated with organic materials which correspond to a biochemical oxygen demand (BOD) level. In 2004, Goldschmidt discharged over 37 million gallons of wastewater, carrying with it a BOD load of 533,295 lb. The Goldschmidt Janesville plant has implemented improved cleanup procedures and processes to reduce the amount of contaminated water flowing to the pretreatment plant. As stated above, this resulted in a 30% BOD reduction. Even after such a significant reduction was achieved, Goldschmidt is confident that it can further improve on-site treatment methods to reduce wastewater BOD by 55% by 12/31/07.

Future Performance

The Janesville plant's long history of outstanding environmental performance as a result of its robust environmental management system demonstrates our commitment to environmental excellence and thus our interest in being a part of the Wisconsin Green Tier initiative. Goldschmidt will closely monitor the progress of the environmental objectives presented in this application toward meeting the established targets. Furthermore, through annual environmental aspects and impacts analyses and other related activities, new objectives will be identified and implemented via ongoing environmental management programs.