

**EPCRA Off-Site Facility Plan  
For  
ACE HARDWARE DISTRIBUTION CENTER – LA CROSSE**

**I. FACILITY NAME:**

Name: Ace Hardware Distribution Center – La Crosse  
Location Address: 500 Fanta Reed Place, La Crosse, WI 54603  
Phone Number: 608-783-7771  
Facility ID # Assigned by WEM: 3261-3

**II. FACILITY EMERGENCY COORDINATOR: ALTERNATE COORDINATOR:**

Name: Bob Meurer  
Position: Facility Manager  
Telephone Number: 608-783-7771  
Cell phone: 608-317-2406

Name: Mike Moit  
Position: RSM  
Telephone Number: 608-783-7771  
(815)-876-7309

**III. CHEMICALS ON SITE: EXTREMELY HAZARDOUS SUBSTANCES**

<u>CAS #</u>	<u>Chemical Name/ Trade Name</u>	<u>Max. Quantity</u>	<u>Vul. Zone</u>	<u>Rural/ Urban</u>
7664939	Sulfuric Acid	2,000 lbs	.1 mile	Rural

**OTHER HAZARDOUS CHEMICALS: *NONE***

<u>Name</u>	<u>Max. Quantity</u>
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The facility is a warehouse of products found in Ace Hardware retail stores and may contain significant quantities of paint, household chemicals and pesticides. However, none are kept in a quantity requiring EPCRA compliance or planning.

**IV. PRIMARY EMERGENCY RESPONDERS:**

La Crosse Fire Department  
La Crosse County Type II Hazardous Materials Response Team  
Wisconsin Regional Type I Hazardous Materials Response Team  
La Crosse Police Department  
La Crosse Sheriff Department  
Tri-State Ambulance Service  
La Crosse County Emergency Management  
Wisconsin Department of Natural Resources

**V. SUPPORT AVAILABLE FROM FACILITY:**

**CHEMICAL EMERGENCY MONITORING EQUIPMENT:**

None

**PERSONAL PROTECTIVE EQUIPMENT:**

The facility maintains a supply of full mask 3M respirators with appropriate cartridge filters, tyvek suits, acid resistant gloves, latex booties

**OTHER EQUIPMENT/SUPPLIES:**

absorbents: PIG absorbent pads

other equipment/supplies: baking soda

**OUTSIDE RESOURCES AVAILABLE:**

La Crosse County does have a Type II Hazardous Materials Response Team. For Type I incidents, contact the West Central Regional Hazardous Response Team through the Wisconsin Emergency Management Duty Officer (800-943-0003).

**VI. GENERAL INFORMATION AND ASSUMPTIONS: (Disclaimer)**

The vulnerability zones set forth in this Plan are based on the EPA Technical Guidance for Hazards Analysis. The zones are based on a credible worst case scenario and identify the potential area for impact should an air-borne release of a single EHS chemical occur.

The vulnerability zones are NOT intended to be used as a guide for population protection in fire-related incidents. Fire incidents were considered in the development of this plan and the plan provides basic information about the facility for first responders to employ. However, in an actual fire situation at this facility, the Incident Commander is strongly recommended to reference the fire department's own individual agency pre-emergency plans and standard operating procedures as well as the County's Emergency Operations Plan - Annex K: Fire and Rescue, as they may relate to this facility when making decisions at an incident involving fire.

Further, fire departments that would respond to an incident at this facility are strongly encouraged to meet with facility representatives to determine ways to minimize an event at the facility and to determine what additional information and factors should be taken into consideration in the event of a fire, should one occur.

The field incident commander shall determine the actual response to an incident and the affected area may vary from the planning vulnerability zone identified in this Plan. Depending on wind speed and direction, the amount of material released and other pertinent factors, the ACTUAL vulnerability zone may be smaller, and in some instances larger, than the credible worst case vulnerability zone identified herein.

The vulnerability zones determined in this Plan are for general “PLANNING PURPOSES.”

#### STATE REPORTING REQUIREMENTS:

##### Wisconsin Statute §292.11 WISCONSIN SPILL LAW

The spill law, Chapter 292.11, Wis. Stats., requires that a person who possesses or controls a hazardous substance or who causes the discharge of a hazardous substance shall notify the department **immediately** of any discharge not exempted by the statute. The Department has a 24-hour toll free number for reporting spills: **1-800-943-0003**.

##### Chapter NR 706 Wisconsin Administrative Code

Ch. NR 706, Wis. Adm. Code establishes exemptions for small quantity spills of agricultural and petroleum related compounds, as well as substances that have a federal reportable quantity established. These quantities are termed “de minimis” in that below these levels, under the following conditions, state notification of a discharge is not required. While reporting requirements may be exempted, **cleanup requirements remain**. If a discharge meets one of the following de-minimis exemptions **it must be reported to the Wisconsin DNR**:

1. Has not evaporated or been cleaned up in accordance with NR 700 – 726,
2. Adversely impacts or THREATENS to adversely impact the environment,
3. Causes or THREATENS to cause chronic and/or acute human health impacts, or
4. Presents or THREATENS to present a fire or explosion hazard or other safety hazard (including all evacuations)

#### VII. HAZARD ANALYSIS SUMMARY:

##### A. Brief description of facility.

Opened in 1986 and located on a 22-acre site in the Airport Industrial Park southeast of the La Crosse Municipal Airport, the La Crosse RSC currently serves nearly 300 retailers in Wisconsin, Minnesota, North and South Dakota, and portions of Illinois, Iowa, Nebraska, and Michigan. The center presently employs more than 160 people and has 32 receiving and 33 shipping docks and a fleet of 19 tractors and 46 trailers. A 200,000 sq. ft. addition was completed in the summer 2001, bringing the facility’s total square footage to some 550,000 sq. ft. Industrial electric forklifts are used throughout the facility. The battery electrolyte contains sulfuric acid, a reportable Extremely Hazardous Substance (EHS). The largest industrial battery contains 320 lbs of electrolyte solution with a 25% concentration of sulfuric acid.

B. Greatest potential for release.

The greatest potential for the release of sulfuric acid (battery electrolyte solution) would occur during the routine maintenance of the industrial batteries. It is nearly impossible to release the entire contents of all the industrial batteries at once.

C. Vulnerability Zone for each EHS chemical, including parameters used to arrive at the Vulnerability Zone (rural or urban, wind speed, atmospheric stability, class, level of concern, duration of release).

The hazard analysis is as follows:

EHS Chemical: Sulfuric Acid  
Form: Liquid  
Container Size: 320 lbs. of battery electrolyte solution  
Concentration: 25 %  
Parameters used in the hazard analysis:  
Level of Concern: 1/10 IDLH  
Duration of Release: 10 minutes

WORST CASE SCENARIO:

Rural  
Wind Speed: 3.4 mph  
Atmospheric Stability Class: F  
Vulnerability Zone: .1 miles

RE-EVALUATION SCENARIO:

Rural  
Wind Speed: 11.9 mph  
Atmospheric Stability Class: D  
Vulnerability Zone: .1 miles

It is estimated that 0 (none) people may be affected (off-site) by an accidental release of sulfuric acid.

D. Possible limitations or problems that could arise.

Due to the large size of the warehouse, it may be important to relay access and spill/victim location information to responders prior to their arrival.

E. Estimate of population affected.

Because of the size of the facility and the lack of any adjacent residences, only those persons within the facility could be affected by a release of sulfuric acid.

F. Conclusions.

The presence of battery electrolyte solution containing sulfuric acid at the Ace Hardware Distribution Center poses a very negligible impact on the community. Depending upon the location of the spill within the 550,000 square-foot building, the .1 vulnerability zone may extend across a small portion of I-90 or north into the Upper Midwest Environmental Sciences Center property.

#### **VIII. SPECIAL FACILITIES AFFECTED:**

There are no special facilities in the Vulnerability Zone.

#### **IX. POPULATION PROTECTION:**

The determination to shelter in place or to evacuate will be made by the on-scene commander as appropriate. The lead time for a hazardous materials incident may be very short. As a result, there may not be time enough for safe evacuation, especially when extremely toxic chemical fumes are involved. An evacuation under these considerations may expose the population to dangerous toxic chemicals and the decision may be made to shelter in place. Preferred areas for protective sheltering would be interior hallways, rooms without windows or exterior doors, enclosed stairways and rooms on the side of the building away from where the hazard is approaching. Doors, windows, and other potential air leaks should be sealed up to prevent toxic fumes from entering.

Experience indicates that shelter space would need to be provided for only 30% of the population within the initial isolation and evacuation zones and the remaining 70% would seek shelter with family and friends outside of the risk zone.

Roles and responsibilities relative to evacuation and sheltering as well as a list of shelters appears in the La Crosse County Emergency Operations Plan, Annex E.

#### **X. SPECIAL CONSIDERATIONS:**

##### **A. Limited access to facility**

The facility is located on French Island which has two roadways connected to the mainland; Interstate Highway 90 (adjacent to the facility) and Clinton Street/County Highway B. Any challenges to traffic flow on either roadway could delay access/egress at this facility.

##### **B. Address environmental concerns at facility and in Vulnerability Zone.**

The facility is adjacent to the Black River; however the .1 mile vulnerability zone does not extend into the waterway. Efforts may be required to prevent spilled substances from entering the river via floor drains, ditches or other

pathways.

- C. Actual response capabilities at facility  
The Loss Prevention team and maintenance personnel are trained to handle incidental spills of sulfuric acid.
- D. Potential for affecting other jurisdictions  
The .1 mile vulnerability zone lies within the City of La Crosse, but is adjacent to properties in the Town of Campbell.

**NOTE:** There are no local ordinances in La Crosse County which mandate specific routes for vehicles carrying Extremely Hazardous Substances (EHSs). Thus, EHSs may be transported over any local, state, or federal highway for which weight limits are met.

**DISTRIBUTION LIST:**

La Crosse Fire Department  
La Crosse County Local Emergency Planning Committee  
Wisconsin Emergency Management