

**EPCRA Off-Site Facility Plan  
For  
ASHLEY FURNITURE WAREHOUSE**

**I. FACILITY NAME:**

Name: Ashley Furniture Warehouse  
Location Address: 1637 St. James Street, La Crosse, WI 54603  
Phone Number: 608-323-6951  
Facility ID # Assigned by WEM: 019831-4

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

Name: Scott Wright  
Position: Security Manager  
Telephone Number: 608-304-0111  
24 Hour Phone: 608-304-0911

Name: Bill McLain  
Position: Corp Environmental Mgr.  
Telephone Number: 608-323-6175  
24 Hour Phone: 608-304-0911

**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>
7664-93-9	Sulfuric Acid	2,695 lbs	.1 mile	Urban

**OTHER HAZARDOUS CHEMICALS:**

<u>Name</u>	<u>Max. Quantity</u>
None	

**IV. PRIMARY EMERGENCY RESPONDERS:**

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

**V. SUPPORT AVAILABLE FROM FACILITY:**

**OTHER EQUIPMENT/SUPPLIES:**

- Universal Spill Kit - 20 Gallon Kit Includes: (12) 15 x 19" Pads, (3) 3" x 12' Sorbent Socks, (2) 18 x 18" Pillows, (1) pair Nitrile Gloves, Emergency Handbook, Goggles and (3) Disposal Bags.
- 3 bags of floor dry
- 2 bags of sodium bicarbonate

## **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. The Ashley Furniture Warehouse – La Crosse is located in a former grocery distribution facility located on an 18 acre site in the City of La Crosse northside industrial park. Although a few apartment units are located adjacent to the industrial park, most of the buildings near the Ashley Furniture Warehouse are commercial/industrial. The warehouse is used to store furniture intended for distribution to retail facilities. Some items are packaged for assembly by the purchaser. Forklifts and other industrial material moving devices are used in this facility. Many of these devices use large industrial electric batteries containing sulfuric acid in the battery electrolyte solution.
- B. As with all facilities where industrial electric batteries are used, the greatest likelihood of a release or spill of the extremely hazardous substance (EHS) would occur during the routine maintenance or movement of the batteries. Because the devices with industrial batteries are used throughout the facility there is almost no likelihood of releasing the entire contents of every battery, except during a catastrophic destruction of the entire facility. Several batteries may be located at the battery charging station, however.
- 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: 146 lbs.  
Concentration: 25 %  
Parameters used in the hazard analysis:  
Level of Concern: 1 mg/m<sup>3</sup>  
Duration of Release: 10 minutes

WORST CASE SCENARIO:  
Rural

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

**RE-EVALUATION SCENARIO:**

Urban  
Wind Speed: 11.9 mph  
Atmospheric Stability Class: D  
Vulnerability Zone: .1 mile

It is estimated that NO local residents may be affected by an accidental release of battery electrolyte solution containing sulfuric acid.

- D. Possible limitations or problems that could arise. The Ashley Furniture Warehouse is located within a large commercial property that may house other commercial interests. Notification of other building occupants or users may require careful coordination and sharing of information.
- E. Estimate of population affected. There are no homes or apartments or other dwelling structures within .1 mile of this facility, therefore, no one lives in the vulnerability zone.
- F. Conclusions.

**VIII. SPECIAL FACILITIES AFFECTED:**

There are no special facilities located within the .1 mile vulnerability zone for this facility. The Margaret Annett Head Start facility is located at 1321 St. James Street and may need to be notified if a large-scale incident should occur at the Ashley Furniture warehouse.

**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 appear in the La Crosse County Emergency Operations Plan, Annex E.

**X. SPECIAL CONSIDERATIONS:**

- A. Limited access to facility. This is a secure facility and the Fire Department does not have a Knox Box for the Ashley Furniture Warehouse.
- B. Address environmental concerns at facility and in Vulnerability Zone. Run-off from spills may enter storm drains which lead to the nearby La Crosse River Marsh.
- C. Actual response capabilities at facility. This is a warehouse facility, not an industrial manufacturing facility; therefore limited spill response capabilities are in place.
- D. Potential for affecting other jurisdictions. The limited vulnerability zone for the release of sulfuric acid (>.1 mile) does not extend into any adjacent communities or impact any major thoroughfares or highway routes.

**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.