

EPCRA Off-Site Facility Plan
For
Bimbo Bakeries, USA doing business as:
Bimbo Baking Company
WEM #010266-4

Formerly:
Sara Lee Bakery

I. FACILITY NAME:

Name: Bimbo Bakery
Location Address: 334 5th Avenue South, La Crosse, WI 54601
Phone Number: 608-782-8488 x320
Facility ID # Assigned by WEM: **010266-4**

II. FACILITY EMERGENCY COORDINATOR: ALTERNATE COORDINATOR:

Name: Phil Roraff	Name: Scott Reynen
Position: Maintenance Supervisor	Position: Plant Manager
Telephone Number: 608-782-8488 x 332	Telephone Number: 608-782-8488 x 308
24 Hour Phone: 608-345-2754	24 Hour Phone: 608-569-7233

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	2975 lbs	.1 mile	Urban

OTHER HAZARDOUS CHEMICALS:

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

IV. PRIMARY EMERGENCY RESPONDERS:

West Central Regional Type I Hazardous Materials Response Team
La Crosse County Type II 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:

Employees are provided with hazard awareness training. Hazardous materials response training is not provided. Supervision/management of the shift directs appropriate staff in case of a spill.

CHEMICAL EMERGENCY MONITORING EQUIPMENT:

Facility has a confined space gas/oxygen meter

PERSONAL PROTECTIVE EQUIPMENT:

boots and gloves
helmets with eye protection

OTHER EQUIPMENT/SUPPLIES:

Absorbents: Facility provides pads or socks in small quantity spill control kits

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).

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)

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."

VII. HAZARD ANALYSIS SUMMARY:

A. Brief description of facility.

Bimbo Bakery, La Crosse is a bread crouton and shred production facility. The quantity of the EHS substance (sulfuric acid) is found in the battery electrolyte solution in the industrial forklifts, pallet movers, scissors lifts and flood scrubbers batteries used throughout the facility.

B. As with all industrial forklift batteries, the greatest risk for a spill of battery electrolyte solution containing the EHS substance (sulfuric acid) would occur during the routine maintenance of the batteries. It would be nearly impossible to release all of the contents of all the industrial batteries at once. However, the vulnerability zone for the release of sulfuric acid will always be .1 mile, regardless of quantity, wind speed or other atmospheric condition. The largest industrial battery used at this facility is found on only one device (Crown 2B fork truck) and contains 404.64 lbs of sulfuric acid in the battery electrolyte solution. The hazard analysis is based on the release of the entire electrolyte solution from this single forklift battery.

C. Vulnerability Zone

The hazard analysis is as follows:

EHS Chemical: Sulfuric Acid
Form: Liquid
Container Size: 404.64 lbs
Concentration: 25 % by weight
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: .1miles

RE-EVALUATION SCENARIO:

Rural or Urban: Urban
Wind Speed: 11.9 mph

Atmospheric Stability Class: D
Vulnerability Zone: .1 miles

D. Possible limitations or problems that could arise.

Fire Department/HazMat Team vehicle access to the loading dock area or other locations within the facility may be limited. Ingress and egress routes and doors should be carefully mapped. Devices containing large industrial batteries may be used throughout the facility. The battery charging stations are the only single/fixed locations where a spill would likely occur.

E. Estimate of population affected.

Approximately 50 people reside within the .1 mile vulnerability zone; however hundreds of employees and customers at various nearby businesses could be affected by a release of sulfuric acid at this facility. Two nearby apartment buildings, the River Center Plaza and Apartments (415 King Street) and Michael Heights, 420 5th Avenue South, are the only residence concentrations within, or adjacent to, the .1 mile vulnerability zone. Cameron Park is adjacent to Bimbo Bakery and is often occupied with dozens of persons during the seasonal weekly Farmers Market activities. Responders should consider notification procedures should a release occur.

F. Conclusions.

The risk to the community from a release of EHS at this facility is minimal. However, emergency planners and responders should consider the challenges posed by the numerous businesses and key government facilities located near this facility.

VIII. SPECIAL FACILITIES AFFECTED:

NONE

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 vehicular access and parking at this facility. The adjacent Cameron Park could be

used for a Triage Zone or employee staging area. Bimbo Baking Company has designated the north-east corner of Cameron Park as the employee emergency gathering zone.

- B. Address environmental concerns at facility and in Vulnerability Zone:
The Mississippi River is located five city blocks west of this facility. Public works personnel should work closely with emergency responders to determine if floor drains or city storm water drains may direct any spilled substances into the river.
- C. Actual response capabilities at facility:
Facility personnel are not trained or equipped to manage a hazardous materials spill.
- D. Potential for affecting other jurisdictions
None. The facility is located within the downtown area of the City of La Crosse and the .1 mile vulnerability zone does not impact any other community. La Crescent, Minnesota (2.6 miles northwest) and the Town of Campbell (1.5 miles north-northwest) are well outside of the vulnerability zone and would not be directly impacted by any release of EHS substance from this facility.

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.