

**EPCRA Off-Site Facility Plan
For
CC VIII Operating, LLC
(Charter Communications)
19859-0**

I. FACILITY NAME: CC VIII OPERATING, LLC

Name: CC VIII OPERATING, LLC
Location Address: 1228 12th Avenue South, Onalaska, WI
Phone Number: (314) 486-8257
Facility ID # Assigned by WEM: 19859-0

**II. FACILITY EMERGENCY
COORDINATOR:**

Name: Troy Knutson
Position: Supervisor
Cell: (715) 370-7095
Office: (608) 519-3699 x 38112

ALTERNATE COORDINATOR:

Name: Bruce Wasleske
Position: Supervisor
Office: (715) 342-2539
24 Hour: (715) 574-8236

Tier II Contact:
Jim Govro
(314) 486-8257
Jim.govro@chartercom.com

Local site contacts:

Troy Knutson Senior Head-end Technician 715-370-7095
troy.knutson@chartercom.com

Jim Summers Head-end Technician 608-304-4148
james.summers@chartercom.com

Darwin Thompson ISP Manager 715-370-7419
darwin.thompson@chartercom.com

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	1,461 lbs	>.1 mile	Rural

OTHER HAZARDOUS CHEMICALS:

<u>Name</u>		<u>Max. Quantity</u>
7439921	Lead	12,336 lbs

IV. PRIMARY EMERGENCY RESPONDERS:

Onalaska Fire Department
Onalaska Police Department
La Crosse Regional Type II Hazardous Materials Response Team
West Central Regional Type I Hazardous Materials Response Team
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:

None

OTHER EQUIPMENT/SUPPLIES:

None

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.

The building is located in the City of Onalaska on 12th Avenue South directly west of the Gander Mountain sporting goods store and southwest of the Sam's Club in the Crossing Meadows retail area. Large commercial telecommunication batteries containing sulfuric acid and lead are used in this building in Uninterruptable Power Supplies (UPS) as well as for communication system service (cable television, Internet and telephone).

B. Greatest potential for release. The greatest potential for release of sulfuric acid would occur during the routine maintenance or exchange of the large industrial batteries. It is unlikely, if not impossible, to release the entire amount of sulfuric acid during those procedures.

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:

Hazardous Materials Quantities							
C&D TECHNOLOGIES, INC.							
HAZMAT TABLE: LEAD WEIGHT & ACID CONTENT per CELL TYPES							
Product Line	Model	# of Cells per unit	Specific Gravity	Lead Weight per Cell (Lbs)	Electrolyte Weight per Cell (Lbs)	Pure Sulfuric Acid Weight per Cell (Lbs)	Electrolyte Volume per Cell (Gal)
UPS High Rate Max	UPS12-490MR	6	1.310	12.4	3.2	1.3	0.3
msEndur II	ATL-39P	1	1.250	190	66.0	22.3	6.3

UPS Batteries – CD Technologies S12-490MR 40 batteries online at site.
 7.8lbs of pure sulfuric acid per battery
 Total: 312 lbs of sulfuric acid

DC Plant Batteries – CD Technologies AT-39P 48 batteries online at site.
 22.3lbs of pure sulfuric acid per battery
 Total: 1,070.4 lbs of sulfuric acid

The largest battery contains approximately 66 lbs of electrolyte solution.

The hazard analysis is as follows:

EHS Chemical: Sulfuric Acid
Form: Liquid, Powder in solution, Solid, Gas, Granular
Container Size: 66 lbs. (One telecommunication system battery)
Concentration: 40 %
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 up to 21 people may be affected by an accidental release of sulfuric acid.

D. Possible limitations or problems that could arise.
None noted.

E. Estimate of population affected.
The CAMEO/MARPLOT calculation for the release of sulfuric acid indicates a potential .1 mile vulnerability zone and that fewer than 25 people reside within .1 mile of this facility.

F. Conclusions.
A release of sulfuric acid at this facility is not likely to result in any off-site concerns.

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 access to facility:

Access is not usually limited. The facility is located on a well-traveled city street that intersects with a County Highway (CTH SS) within one block of this facility. Access to State Highways 16 and 157 is within a few blocks as well as an interchange with Interstate Highway 90.

B. Address environmental concerns at facility and in Vulnerability Zone:

NONE

C. Actual response capabilities at facility:

NONE

D. Potential for affecting other jurisdictions:

NONE