

EPCRA OFF-SITE PLAN FOR
Crown Beverage Packaging Co.
1501 St. James Street
La Crosse WI 54603

I. FACILITY NAME:

Crown Beverage Packaging Co.
Plant #66
1501 St. James Street
La Crosse WI 54603
608-782-6300
Facility ID # Assigned by SERB: **000277-3**

II. FACILITY COORDINATOR:

Sarah McElroy
Environmental/SPC Coordinator
Telephone Number:
608-791-3285 (w)
608-791-3260 (after-hours)
608-738-3486 (c)
608-791-3277 (f)
608-782-6880 (Per Mar Security)

ALTERNATE COORDINATOR:

Joe W. Macht
Department Superintendent
Telephone Number:
608-791-3260(w)
608-788-1437 (h)
608-785-2484 (f)

III. CHEMICALS ON SITE: EXTREMELY HAZARDOUS SUBSTANCES

| <u>CAS #</u> | <u>Chemical Name/ Trade Name</u> | <u>Max. Amt.</u> | <u>Vul. Zone</u> | <u>Rural/ Urban</u> |
|--------------|--------------------------------------|----------------------|----------------------|-------------------------|
| 7664-39-3 | Hydrofluoric Acid | 9,000 - lbs. | >10 mi. | Urban |
| 7664-93-9 | Sulfuric Acid | 35,000 - lbs | <0.1 mi. | Urban |

OTHER HAZARDOUS CHEMICALS:

| | | |
|-----------|-------------------|---------------|
| 1310-73-2 | Sodium Hydroxide | 28,000 - lbs |
| 74-98-6 | Propane | 236,472 - lbs |
| 111-76-2 | 2-Butoxyethanol | 17,512 - lbs |
| 1305-62-0 | Calcium Hydroxide | 40,000 - lbs |
| 71-36-3 | N-Butyl Alcohol | 17,106 - lbs |

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 Sheriff's Department
Wisconsin State Patrol
Wisconsin Department of Natural Resources
La Crosse County Emergency Management
Tri-State Ambulance

V. SUPPORT AVAILABLE FROM FACILITY:

There are three spill response equipment cabinets in this facility. The bulk tanks are installed within high cement wall containment berms. The facility has two Industrial Scientific model VENTIS MX4 multi-gas monitors which are kept in the Supervisor's Office as well as numerous absorbent materials, assorted spill equipment, and PPE. Information found in the facility's Hazardous Waste Contingency Plan indicates available emergency equipment including: chemical splash goggles, face shields, chemical resistant gloves, air purifying respirators and cartridges/filters(located in the store room), chemical resistant boots and suits, absorbent 'socks', absorbent pads and compound, overpack barrels, spark resistant shovels, hazmat perimeter control tape, and acid neutralizer/absorbent.

CHEMICAL EMERGENCY MONITORING EQUIPMENT:

Two Industrial Scientific model VENTIS MX4 multi-gas monitors

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). We have also contracted with Safety-Kleen to come in the event of any chemical or oil spill. (1-888-375-5336)

| | |
|--------------------------|--------------|
| CHEMTREC | 800-424-9300 |
| Hydrite Chemical | 414-277-1311 |
| National Response Center | 800-424-8802 |

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:

The Crown, Cork and Seal (also known as Crown Beverage Packaging) facility could have upwards of 40 employees at the facility during an event. Crown, Cork and Seal is a manufacturer of aluminum beverage cans. The facility is located three blocks east of Highway 35 (local street name is George Street on the north side of La Crosse). Responding equipment traveling north on Gateway Court from St. James Street will find the facility gate at the northwest edge of the property.

The hydrofluoric acid tank is located in the northwest corner of the building. The filling line and the tank in the building are labeled "Chemtool CTG NUETCH (OEM)". Hydrofluoric acid is used to clean the cans before the labels are printed onto them. The bulk tank can hold up to 6,500 gallons of hydrofluoric acid solution (21%). The bulk tank is located near the northwest corner of the building in a chemical storage area. All bulk tanks are enclosed in a concrete containment area. This Extremely Hazardous Substance is toxic and corrosive (non-combustible/water-sensitive). It is toxic by inhalation, ingestion or contact (skin, eyes) with vapors and dust. This substance may cause severe injury, burns or death.

Sulfuric acid is used in various concentrations during the aluminum can production. A large bulk tank is installed adjacent to the large hydrofluoric acid tank and has a 12,000 gallon capacity. However, this tank is never filled with more than 7,000 gallons of sulfuric acid. Both the filling line and tank are labeled: "Chemtool CTG NU CLENE". The maximum amount of sulfuric acid in the NUCLENE solution is 33,500 lbs. This Extremely Hazardous Substance is toxic and corrosive

(non-combustible/water-sensitive). It is toxic by inhalation, ingestion or contact (skin, eyes) with vapors and dust. This substance may cause severe injury, burns or death.

Sulfuric Acid 66 Degree is used in 300 gallon totes that are currently kept at the facility, as specified in the attached Extremely Hazardous Substances map. The maximum amount of sulfuric acid is 1,500 lbs. The average daily amount of sulfuric acid combined (Nu Clene and 66 degree totes) is 1,000 lbs.

Sodium Hydroxide is used in the waste water treatment processes. It is toxic. Inhalation, ingestion or skin contact with material may cause severe injury or death.

Ethylene Glycol Monobutyl Ether (2-Butoxyethanol) is used for the aluminum can processing. A large tank capable of holding 17,882 lbs is located in the tank farm area, and a smaller amount (25 lbs) is kept in the washer area. This substance is highly toxic and may be fatal if inhaled, swallowed or absorbed through skin.

Propane is used to heat the waste incinerators during times when natural gas supplies may be limited.

N-Butyl Alcohol is a solvent and is used as a stabilizing agent. It is highly flammable; easily ignited by heat, sparks or flames. Acute exposure to this substance may result in central nervous system depression, lowering of blood pressure, nausea and diarrhea.

Potentially dangerous materials are used and stored at this facility. These materials, when used under normal conditions, pose no threat. However, the hazard to persons and property can increase dramatically if the materials are somehow released from the controlled environment.

It was determined that the greatest risk of a HAZMAT incident would occur during loading and unloading of bulk chemicals.

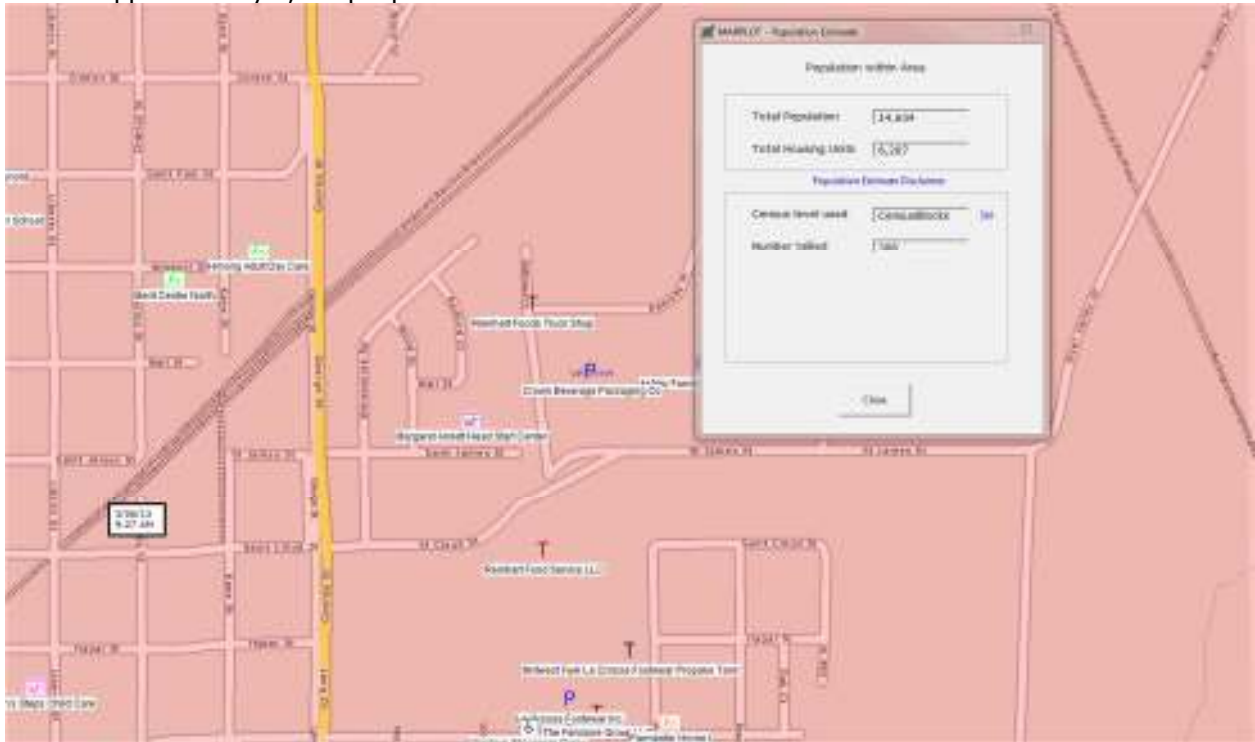
Crown Beverage Packaging maintains a spill containment system and a plant standard operation procedure to prevent a release into an adjacent storm sewer should a spill occur during chemical unloading. The unloading area tapers to a facility drain which is switched by valves from storm sewer access to two buried pancake tanks that would contain the amount of any potential chemical bulk unloading incident.

CAMEO software was used to compute the vulnerability zones. Parameters used for the hazard analysis were as follows:

| | |
|---|-----------------------------------|
| EHS Chemical: | Hydrofluoric Acid (NuEtch) |
| Form: | Liquid |
| Container Size: | 6,500 gallons (689 lbs.) |
| Concentration: | 21% |
| Parameters used in the hazard analysis: | |
| Level of Concern: | 1/10 IDLH |
| Duration of Release: | 1 minute |
| WORST CASE SCENARIO: | |
| Rural | |
| Wind Speed: | 3.4 mph |
| Atmos. Stability Class: | F |
| Vulnerability Zone: | >10 miles |
| RE-EVALUATION SCENARIO: | |

Rural or Urban: Urban
Wind Speed: 11.9 mph
Atmos. Stability Class: D
Vulnerability Zone: 1.3 miles

113,973 people are within the 10 mile worst case vulnerability zone.
Approximately 9,662 people reside within the 1.6 mile re-evaluation zone.



CAMEO software was used to compute the vulnerability zones. Parameters used for the hazard analysis were as follows:

| | |
|---|--------------------------------|
| EHS Chemical: | Sulfuric Acid (NuClene) |
| Form: | Liquid |
| Container Size: | 33,500 lbs. |
| 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 |
| Atmos. Stability Class: | F |
| Vulnerability Zone: | <0.1 miles |
| RE-EVALUATION SCENARIO: | |
| Rural or Urban: Urban | |
| Wind Speed: | 11.9 mph |
| Atmos. Stability Class: | D |
| Vulnerability Zone: | <0.1 miles |

Sulfuric acid is kept in a bulk storage tank located in a concrete containment area northwest of the building. The acid is used to prepare the cans for the etching and labeling processes.

According to the MARPLOT software application, only employees in the immediate vicinity of a spill would be affected by an accidental release. However, a satellite image indicates a portion of one apartment building and one home lie within the .1 vulnerability zone.

VIII. SPECIAL FACILITIES AFFECTED:

Due to the large (10 mile) vulnerability zone for hydrofluoric acid, numerous special facilities located in several communities may be impacted by a release of the EHS from this facility. Refer to the list of SPECIAL FACILITIES attachment. The 10 mile zone extends into Minnesota, but for planning purposes the list of special facilities will be mostly limited to those located in La Crosse County.

At least 100 Day Care Centers are located in the 10 mile zone in La Crosse County.

IX. POPULATION PROTECTION:

The on-scene commander will make the determination to shelter in place or to evacuate 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:

The vulnerable zones for this facility cover a number of major traffic routes which in the event of a release would require detours and traffic redirection. The control and movement of traffic on impacted roadways would be a responsibility of the La Crosse Police Department and the La Crosse County Sheriff's Department, assisted where possible by the Wisconsin State Patrol. Control zones and detours would be established depending upon wind direction and the size of the release. In the event of a long duration situation, the La Crosse City Street Department may be called upon to provide additional traffic control support through the use of signs, barricades, flashers, and personnel.

Warnings to the population could be issued by the local 24 hour National Weather Service and local radio and TV Stations. The County Public Safety Communications Department (9-1-1 Dispatch) has an Emergency Alert System encoder and can transmit emergency messages to the local broadcast media.

A 74-unit La Crosse Housing Authority apartment complex (Schuh Homes) is located immediately to the west of this facility. Efforts may be needed to provide sheltering-in-place and/or evacuation procedure information to the residents.

Myrick Park and the UW-La Crosse Athletic Fields are seasonal usage areas located approximately 1 mile south of this facility. In the event of an incident, immediate evacuation of a large number of users would be of paramount importance.

The UW-La Crosse, Viterbo University and Western Technical College campuses are within the vulnerability zone. The Incident Commander should be in contact with the campus authorities should evacuation be deemed necessary.

The La Crosse River Bike Trail system is within the affected zone. The La Crosse Marsh Bike Trails are also within this zone. The incident commander should remain aware that these areas may be utilized by large numbers of people.

The Wisconsin Department of Natural Resources should be notified of possible harm to the La Crosse River, Black River or Mississippi River.

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.