

EPCRA OFF-SITE PLAN FOR
 Great Lakes Cheese of La Crosse WI, Inc.
 2200 Enterprise Ave.
 La Crosse WI 54603

I. FACILITY NAME:

Great Lakes Cheese of La Crosse WI Inc.
 2200 Enterprise Avenue
 La Crosse, WI 54603-1712
 608-781-2800
 Facility ID # Assigned by WEM: **001050-0**

II. FACILITY COORDINATOR:

Dan Leitzke
 Plant Engineer
 Telephone Number:
 608-781-2800 (w)
 608-526-2175 (h)
 608-397-5338 (cell)

ALTERNATE COORDINATOR:

Walt Ehret
 Plant Manager
 Telephone Number:
 608-781-2800 (w)
 608-582-9928 (h)

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>
7664-41-7	Anhydrous Ammonia	21,786 pounds	>10 miles	Urban
7697-37-2	Nitric Acid 14%	225 pounds	.1 mile	Urban
7697-37-2	Nitric Acid 33.5%	557 pounds	.1 mile	Urban
(The amount of Nitric Acid is under the Section 312 Threshold Planning Quantity of 1,000 lbs, but is included in this list for informational purposes only.)				
7664-93-9	Sulfuric Acid	5,922 pounds	.1 mile	Urban

OTHER HAZARDOUS CHEMICALS:

8008-20-6	Fuel Oil #2	3,000 gallons (24,900 pounds)
1310-73-2	Caustic Soda	2,439 pounds
57-55-6	Propylene Glycol (food grade)	750 gallons (6,225 pounds)
7439-92-1	Lead (in forklift batteries)	66,888 pounds

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

V. SUPPORT AVAILABLE FROM FACILITY:

Maintenance personnel are on site to assist La Crosse Fire Department. However, no special training or equipment is available from the facility.

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).

CHEMTREC	1-800-424-9300
ECO Lab	1-800-392-3392

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:

Great Lakes Cheese of La Crosse is a manufacturer and packer of natural and processed bulk, shredded and sliced cheeses. They could have upwards of 100 employees at the site during an event. There are over 300 employees and the facility is operated during three 8-hour shifts Sunday night through Friday with an occasional Saturday operation. The facility is located on Enterprise Avenue, which is also known as County Highway SS. This site is approximately 1/4 mile south of Interstate I-90. The plant can be reached from the east by travelling west from Hwy. 157 on CTH SS. From the west approaching response, equipment can reach the plant by traveling east from Oak St. on CTH SS. The plant is located in the North La Crosse industrial Park along with many established plants and new industrial sites being developed. The Department of Natural Resources Great River Bike Trail crosses within 1/2 mile of the site.

Great Lakes Cheese of La Crosse

2200 Enterprise Avenue
 La Crosse, WI 54603-1794
 Phone: 608-781-2800
 Fax: 608-781-2972
 Shipping & Receiving: 608-779-6758
 Shipping Fax: 608-779-1332
 Transportation: 440-834-7284
 Transportation Fax: 440-834-2074
glcinfo@greatlakescheese.com

The high-pressure receiver tank of anhydrous ammonia is located outside of the compressor room. This room is in the southwest corner of the building. Access to this room is by an overhead door in the west wall of the plant or inside by going to the southernmost point of the plant. The container is a permanently mounted vertical, dished end, steel tank. One 2 1/2-inch pipe runs from the tank, the return piping is 6" in diameter, and both pipes are elevated 75 feet from the plant floor. Access to the exterior tank is via a locked gate on the fenced-enclosure. Anhydrous ammonia is used for refrigeration. The reported amount of anhydrous ammonia is for the entire plant system, including receivers, compressors, evaporators, condensers and piping. The largest vessel under normal operating conditions contains approximately 5,100 pounds.

The nitric acid is used for cleaning of pipes lines, tanks and other equipment that comes in contact with the food products. This EHS is found in a cleaning solution called Mandate Plus and is stored in three 55 gallon drums. Mandate Plus contains a 14% by weight concentration of nitric acid with a specific gravity of 1.17 for a total of 225 lbs. Nitric Acid is also found in a cleaning solution called UltraSil 76 in three 55 gallon drums with a specific gravity of 1.21 (33.5%) resulting in 557 lbs of nitric acid. 225 (Mandate Plus) + 557 (UltraSil) = 782 lbs. of nitric acid.

The sulfuric acid is contained in the forklift batteries. The largest battery contains about 155 pounds of sulfuric

acid. There are 38 forklift batteries on site, but potentially scattered throughout the facility.

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 their controlled environment.

It was determined that the greatest risk of a HAZMAT incident could occur during the unloading or loading of hazardous materials.

CAMEO software was used to compute the vulnerability zones for this facility. Parameters used were:

EHS Chemical: Anhydrous Ammonia

Form: Gas
 Container Size: 5,100 lbs
 Concentration: 100 %
 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: >10 miles

RE-EVALUATION SCENARIO:

Urban
 Wind Speed: 11.9 mph
 Atmos. Stability Class: D
 Vulnerability Zone: .4 miles

Up to 114,586 persons could be impacted by a release at this facility.

EHS Chemical: Nitric Acid – Mandate Plus

EHS Chemical: Nitric Acid – UltraSil 76

A vulnerability zone was not computed for Nitric Acid because the amount is less than Section 312 TPQ. Nitric Acid is found in 55-gallon drums and is used for general sanitation of food-handling equipment.

EHS Chemical: Sulfuric Acid

Form: Liquid
 Container Size: 5,922 pounds
 Concentration: 100 %
 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: .1 miles

RE-EVALUATION SCENARIO:

Rural or Urban: Urban
 Wind Speed: 11.9 mph
 Atmos. Stability Class: D
 Vulnerability Zone: .1 miles

Fewer than 10 nearby residents would be affected by a release of Sulfuric Acid from this facility. This calculation implies that all of the sulfuric acid contained in the forklift batteries would be released simultaneously, which is not probable. A second CAMEO computation is provided to indicate the release from one forklift battery. However, the vulnerability zone remains at >.1 mile for any quantity of sulfuric acid.

VIII. SPECIAL FACILITIES AFFECTED:**Special Locations:**

Because of the large (10 mile radius) vulnerability zone for anhydrous ammonia, nearly all special facilities located within La Crosse County, except those in the Bangor, Rockland and Mindoro communities, are included in the vulnerability zone. This large zone also includes the City of La Crescent, MN, all of Lake Onalaska, and an 8.5 mile stretch of the Mississippi River. Only those special facilities located within La Crosse County are included in the attached list.

Attached are the lists for the special facilities that would be affected.

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. Consequently, 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:

This facility is located on the northern end of the City of La Crosse Industrial Park. Numerous other commercial properties are located nearby. Thousands of employees may be present in these buildings during a chemical release from any one of the facilities and may require notification, evacuation or emergency care and treatment. Fortunately there are few homes or special facilities within the immediate surrounding area of the Industrial Park.

The local 24-hour National Weather Service, County Public Safety Communications (9-1-1 Dispatch Center), and local radio and TV stations could issue warnings to the population.

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 for which weight limits are met.