

**EPCRA Off-Site Facility Plan  
For  
Kwik Trip Bakery #779  
WEM ID: 017240-1**

**I. FACILITY NAME:**

Kwik Trip Bakery #779  
2306 Commerce Street -(Address changed from 2105 Palace Street in 2012)  
La Crosse, WI 54603  
Phone Number: 608-793-6454  
Facility ID # Assigned by WEM: 017240-1

**II. FACILITY EMERGENCY COORDINATOR:**

John Frie  
Production Operations Maintenance Manager  
Office: 608-793-6489  
Cell: 608-317-7521  
24 hour Telephone: 608-781-8988

**ALTERNATE COORDINATORS:**

~~Name: Dave Vind~~  
~~Position: Maintenance Supervisor~~  
~~Office: 608-793-6439~~  
~~Home: 608-525-2103~~ Mike Byington  
Production Safety Specialist  
Office: 608-793-6421  
Home: 608-519-0313  
Cell: 608-498-3785  
24 hour Telephone: 608-781-8988

~~Doug Ingle~~ Scott Niebuhr  
~~Director of Bakery Operations~~  
~~Office: 608-793-6454~~  
~~Home: 608-783-5567~~

~~Mike Byington~~  
~~Production Safety Specialist~~  
~~Office: 608-793-6421~~  
~~Home: 608-519-0313~~

Chris McKinzie

~~Assistant~~ Director of Human Resources

Office: 608-793-6000

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III. CHEMICALS ON SITE: EXTREMELY HAZARDOUS SUBSTANCES

CAS #	Chemical Name/ Trade Name	Max. Quantity	Vul. Zone	Rural/ Urban
7664-93-9	Sulfuric Acid	<del>43,444</del> 10,181 lbs.		.1 mile Rural
<u>7664-41-7</u>	<u>Anhydrous Ammonia</u>	14,000 lbs.	>10 miles	<u>Rural</u>

IV. PRIMARY EMERGENCY RESPONDERS:

~~La Crosse Regional Level A Type II Hazardous Materials Response Team~~

~~West Central Wisconsin Type I Hazardous Materials Response Team~~

~~La Crosse County Level B 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

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V. SUPPORT AVAILABLE FROM FACILITY:

~~A list of support and resources available at or from the facility including, but not limited to, chemical emergency monitoring equipment, personnel protective equipment, and other equipment and supplies. A sample resource list follows:~~

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CHEMICAL EMERGENCY MONITORING EQUIPMENT:

~~4-gas weather equipment:~~

~~pH meters (fixed or portable):~~

~~combustible gas indicator:~~

~~colorimetric indicator tubes (i.e. draeger tubes):~~

~~radiation detector:~~

~~chlorine kits (A.B.C.):~~

oxygen concentration meter

NH3 detectors in system engine room

Local alarms and remote system monitoring-

~~organic vapor monitor:~~

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**PERSONAL PROTECTIVE EQUIPMENT:**

- ~~positive pressure respirators:~~
- ~~self contained breathing apparatus (SCBA):~~
- ~~SCBA tanks (duration):~~
- ~~mobile cascade:~~
- ~~cascade with compressor:~~
- ~~fully encapsulated suits (indicate type):~~
- ~~fully protective turnout gear:~~
- Boots and gloves:
- Maintenance personnel are provided with adequate PPE and are trained to handle minor spills
- ~~helmets with eye protection:~~

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**OTHER EQUIPMENT/SUPPLIES: (indicate quantity)**

- ~~foam: (indicate type)~~
- ~~sand:~~
- ~~other absorbents: Kwik Trip has battery spill kits at the new consolidated forklift battery charging station (indicate type)~~
- ~~fire equipment:~~
- ~~pumper:~~
- ~~ladder truck:~~
- ~~tanker:~~
- ~~rescue squad:~~
- EMT:
- ~~paramedic:~~
- ~~other:~~
- ~~off road vehicles:~~
- ~~communication vehicle:~~
- ~~multi purpose vehicle:~~
- ~~other equipment/supplies:~~

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**OUTSIDE RESOURCES AVAILABLE:**

La Crosse County does have a Level B Type II Hazardous Materials Response Team. For Level A Type I incidents, contact the La Crosse 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. Kwik Trip, Inc. is a La Crosse, Wisconsin based convenience store business consisting of several divisions; Bakery, Dairy ([refer to off-site plan for Kwik Trip #769](#)), Fleet Maintenance and Convenience Transportation, Kwik Trip/Kwik Star convenience stores, Support Center (Administration), Commissary, and Distribution Warehouse (refer to off-site plan for Kwik Trip #830). Hazardous materials/substances are used in various production facilities as food-line disinfectants, electric batteries for forklifts and other devices, and anhydrous ammonia for large-scale facility cooling and freezing processes. The Convenience Transportation department consists of petroleum and grocery truck and van fleets. The Kwik Trip Bakery is located within the larger Kwik Trip La Crosse complex and produces baked goods and certain ready-to-eat food items for the Kwik Trip convenience stores. A 70,000 square foot building addition completed in 2014 includes a freezer warehouse adjacent to the anhydrous ammonia system engine room which is used to flash-freeze bakery items prior to transportation.
- B. Greatest potential for release. ~~Because all of the~~ [reported sulfuric acid EHS](#) is found in industrial electric battery electrolyte on electric-powered devices, such as forklifts, which are used throughout the facility. ~~It~~ it is highly unlikely that all of the sulfuric acid could be released at once. Therefore, the greatest likelihood of a spill of this EHS may occur during the routine servicing of the industrial batteries.

[A new cooling system using anhydrous ammonia was installed in 2014. Although rare, the most likely occurrence of a release of anhydrous ammonia could be during routine system maintenance or filling of product.](#)

### C. Vulnerability Zone

The hazard analysis is as follows:

EHS Chemical: Sulfuric Acid

Form: Liquid

Container Size: 2624 lbs. ([The contents of the largest industrial battery](#))

Concentration: 43 %

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

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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 just the people within the facility may be affected by an accidental release of sulfuric acid. There are no residential buildings within the .1 vulnerability zone. There are approximately 125 employees present during the day shift.

EHS Chemical: Anhydrous Ammonia

Form: Gas

Container Size (system): 14,000-lbs.

Concentration: 100%

Parameters used in the hazard analysis:

Level of Concern: .035 gm/m3

Duration of Release: 10 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: 2.3 miles

Approximately 114,450 people reside within the 10 mile vulnerability zone.

D. Possible limitations or problems that could arise.

Due to the size of the bakery complex building, and the numerous additions and building modifications, quick and safe evacuation of the entire facility during a release of anhydrous ammonia may be difficult. Timely notifications of an emergency situation to businesses in the immediate area may require significant effort.

E. Estimate of population affected.

No one lives within the .1 mile vulnerability zone for a release of sulfuric acid. However, a significant portion of La Crosse County lies within the 10 mile vulnerability

zone for the release of anhydrous ammonia. (Approximately 114,450 people)

F. Conclusions.

—The sulfuric acid found in industrial electric batteries is rarely gathered in one location at this facility. Only a complete and catastrophic destruction of the entire facility would result in the release of the entire amount of sulfuric acid. Anhydrous ammonia could be released from any number of connection points and system components. Facility operators are encouraged to work with community and public safety leaders to ensure adequate measures are in place to provide effective public notification should a release of anhydrous ammonia occur.

**VIII. SPECIAL FACILITIES AFFECTED:**

~~There are no special facilities located within the .1 mile vulnerability zone for this facility. Refer to the list in Attachment #3 for a list of selected Special Facilities that may lie within the 10 mile vulnerability zone.~~

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

**X. SPECIAL CONSIDERATIONS:**

A. Limited access to facility. The facility is located within the north La Crosse Industrial Park. Ingress/egress is limited to River Valley Road, Oak Street and Enterprise Avenue.

- B. Address environmental concerns at facility. The La Crosse River and Marsh lie to the east and southeast of this facility. It is highly unlikely that any release of sulfuric from the Kwik Trip Bakery would reach into neighboring waterways. Anhydrous ammonia has a chemical affinity for water and would quickly assimilate into streams, ponds and rivers and degrade into the elemental components of hydrogen and nitrogen.
- C. Actual response capabilities at facility. Employees are not trained to respond to hazardous materials spills.
- D. Potential for affecting other jurisdictions. The 10 mile vulnerability zone for the release of anhydrous ammonia extends into Houston County, Minnesota, including the community of La Crescent. It is essential that neighboring communities be notified of any releases if wind conditions may result in exposure to the released substance.

**XI. REQUIRED ATTACHMENTS:**

- A. Facility Layout Highlighting EHS Chemical Storage Location
- B. Vulnerability Zone map highlighting Special Facilities
- C. Chemical Data Sheet on EHS Chemicals (Response Information Data Sheets or MSDS)
- D. Hazardous Materials Worksheet/Calculations or Computer-Generated Vulnerability Zone Calculations

**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.