

**EPCRA OFF-SITE PLAN FOR**

Kwik Trip #830  
 Distribution Center  
 2025 Kwik Trip Way  
 La Crosse, WI 54603

**I. FACILITY NAME:**

Kwik Trip, Inc.  
 2025 Kwik Trip Way  
 La Crosse WI 54603  
 608-781-8988  
 Facility ID # Assigned by WEM: **016428-4**

**II. FACILITY COORDINATOR:**

Dave Vind  
 Maintenance Supervisor  
 Office: 608-793-6439  
 Home: 608-525-2103  
 24 Hour Telephone: 608-781-8988

**ALTERNATE COORDINATORS:**

Todd Nedegaard  
 Warehouse Superintendent  
 Office: 608-793-6062  
 Home: 608-781-1268

Janelle Schlosser  
 Distribution Division Safety Specialist  
 Office: 608-793-6421  
 Home: 608-386-0736

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

Chris McKinzie  
 Assistant Director of Human Resources  
 Office: 608-793-6000

**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>
007664-41-7	Anhydrous Ammonia	44,140-lbs.	>10 miles	Urban
007664-93-9	Sulfuric Acid	151,961-lbs. X 11% =	.1 mile	Urban

16,715-lbs of sulfuric acid

**OTHER HAZARDOUS CHEMICALS:**

068476-34-6	Diesel Fuel	187,800-lbs.	(25,585 gallons)
000074-98-6	Propane	75,570-lbs.	(17,908 gallons)
000124-38-9	Carbon Dioxide	100,000 lbs	

**IV. PRIMARY 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 FROM FACILITY:**

5 SCBA Units  
 7 Respirators  
 10 Level A Suits  
 5 Level B Suits  
 Maintenance tools and equipment  
 Five employees trained to Technician Level

**OUTSIDE RESOURCES AVAILABLE:**

The La Crosse Fire Department serves as the County's Type II Hazardous Materials Response Team. For Type I incidents, contact the West Central Regional Hazardous Materials Response Team through the Wisconsin Emergency Management Duty Officer (800-943-0003).

CHEMTREC	800-424-9300
Cool Air	651-489-8821

**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 Kwik Trip #830 complex is the main distribution center for all Kwik Trip Convenience Stores. Within this complex, besides the distribution center, are also Fleet Services, LP Shed, Ice Plant and Kwik Trip Commissary and Kitchens. Fleet Services provides maintenance support for Kwik Trip's fleet of trucks and cars. **The underground diesel tanks are located near Fleet Services building.** The LP Shed facility is used to refill 20 lb LP cylinders for gas grills. An 18,000 gallon LP tank is located approximately 50 feet from the building. The Kwik Trip #830 complex **has two anhydrous ammonia receivers** with a total amount of 33,400 lbs. The Kwik Trip Kitchens section uses anhydrous ammonia in the refrigeration systems and is stored in a single tank (**12,400-lbs**). The Ice Plant and Distribution Center also uses anhydrous ammonia in the refrigeration systems and is stored in a separate single tank (**18,860- lbs**).

The Kitchens section and the Ice Plant are connected buildings with a common roof-top. A third tank (12,640 – lbs) is located in the south east corner of the building and provides cooling/refrigeration for: . All refrigeration units are roof mounted and all piping is next to large steel beams and is protected from damage by forklifts or other equipment. The greatest likelihood of an incident would be during maintenance procedures or because of a faulty valve or other equipment. There could be some damage to the roof top refrigeration units and piping during a very severe storm.

Numerous forklifts and vehicles that have automotive or industrial batteries containing sulfuric acid (electrolyte solution) are used or kept at this facility complex.

EHS Chemical:	<b>Anhydrous Ammonia</b>
Form:	Gas
Container Size:	18,860-lbs, 12,400- lbs and 12,640-lbs. (44,140)
Concentration:	100%
Parameters used in the hazard analysis:	
Level of Concern:	IDLH: 300 ppm
Duration of Release:	10 minute
<b>WORST CASE SCENARIO:</b>	
Rural	
Wind Speed:	3.4 mph
Atmos. Stability Class:	F
Vulnerability Zone:	>10 miles
<b>RE-EVALUATION SCENARIO:</b>	
Rural or Urban:	Urban
Wind Speed:	11.9 mph
Atmos. Stability Class:	D
Vulnerability Zone:	0.8 miles

Up to 114,575 people could be affected by an accidental release of anhydrous ammonia (worst case scenario). Approximately 250 employees are in the facility compound during normal working hours.

Numerous vehicles and product-moving apparatus are in use at this Kwik Trip facility, including fleet automobiles, grocery and petroleum trucks, power pallet jacks, reach lifts, and rider scrubbers. These machines all have electric batteries containing a sulfuric acid-based electrolyte solution. The total weight of all the lead acid batteries is 240,730-lbs. Sulfuric acid comprises approximately **11%** of the weight, for a total of 26,480.3- lbs. The largest single container (industrial battery) is 2,275-lbs of electrolyte solution (approximately 758-lbs of sulfuric acid). A release of sulfuric acid (battery electrolyte solution) could occur during the maintenance or movement of the large industrial fork lift batteries.

**Sulfuric Acid in Batteries – 26,480-lbs total**

5 Fleet Cars @ 65 lbs x 1/9 = 36 lbs

Grocery (46 Tractors)/Petroleum Truck (25 Tractors) Batteries (3 Batteries per vehicle) - 71 x 3 x 65 lbs x 1/9 = 1,538 lbs

Fresh Case Truck (33 trucks) Batteries (2 per truck) - 33 x 2 x 65 lbs x 1/9 = 477 lbs

Power Pallet Jacks (DC) - 60 @ 1,220 lbs x 1/9 = 8,133 lbs

Reach Lifts (DC) - 19 @ 2,275 x 1/9 = 4,803 lbs

Rider Scrubber - 6 batteries x 65 lbs x 1/9 = 43 lbs

Power Pallet Jacks (Kitchens) - 3 @ 1,220 lbs x 1/9 = 407 lbs

Reach Lifts (Kitchens) - 3 @ 2,275 lbs x 1/9 = 758 lbs

(DC = Distribution Center)

EHS Chemical:	<b>Sulfuric Acid</b>
Form:	Liquid
Container Size:	2,275-lbs. electrolyte per battery, 3 batteries per vehicle (reach lift) for a total of 6,825-lbs. electrolyte or 758-lbs of sulfuric acid
Concentration:	11 %
Parameters used in the hazard analysis:	
Level of Concern:	1/10 IDLH
Duration of Release:	1 minute
<b>WORST CASE SCENARIO:</b>	
Rural	
Wind Speed:	3.4 mph
Atmos. Stability Class:	F
Vulnerability Zone:	< 0.1 miles
<b>RE-EVALUATION SCENARIO:</b>	
Rural or Urban: Rural	
Wind Speed:	11.9 mph
Atmos. Stability Class:	D
Vulnerability Zone:	< 0.1 miles

Because of the size of the Kwik Trip Distribution Center complex and the .1 mile vulnerability zone, only the employees and others (visitors, vendors, etc.) on-site could be affected by a release of sulfuric acid from an industrial battery. Approximately 125 employees are in the facility compound during normal working hours. It is virtually impossible to release the entire amount of sulfuric acid found at this facility during any one incident.

The storage facility for the LP gas is located to the north west of the Distribution Center rear lot. The recommended evacuation zone for a large propane tank fire is 1 mile in all directions. Few residential buildings are within this zone; however this facility lies within a very large and populous industrial park. The two underground diesel fuel tanks (15,000 and 12,000 gallons) were emptied and removed in July, 2012.

#### **VIII. SPECIAL FACILITIES AFFECTED:**

##### **Government Facilities:**

All government facilities and buildings in La Crosse County, except those in Bangor, Rockland and Mindoro, are located within the 10 mile radius vulnerability zone for this facility. The list of affected government facilities is provided in the Special Facilities List Attachment.

##### **Public/Private Schools:**

Every public and private school in La Crosse County is located within the 10 mile radius vulnerability zone for this facility except the Bangor School District and the Mindoro Elementary School. These are all listed in the Special Facilities List Attachment.

##### **Child/Day Care Centers:**

Nearly all of the Child/Day Care providers in La Crosse County are located within the 10 mile radius vulnerability zone for this facility. The list of Child/Day Care providers within the vulnerability zone are listed in the Special Facilities List Attachment.

**Health Care Facilities:**

All health care facilities in La Crosse County are located within the 10 mile vulnerability zone for this facility. These are listed in the Special Facilities List Attachment.

**Parks and Recreational Areas:**

Most of the parks and recreational areas in La Crosse County are located within the 10 mile vulnerability zone. Warning for persons in parks and recreational areas could be difficult to accomplish with existing systems.

**Churches and Places of Worship:**

Nearly all of the churches and places of worship in La Crosse County are located within the 10 mile vulnerability zone. These facilities may need to develop monitoring or alerting systems capable of receiving information regarding hazardous materials incidents as it would be nearly impossible to notify all affected facilities via telephone.

**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. Therefore, 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.

Sheltering in place may be recommended for those near the affected area and suggested for those persons who would be required to travel through an affected area for evacuation if the expected plume area is adjusted because of wind direction change or other factors. It is unlikely that everyone within the 10 mile circle vulnerability zone would need to be evacuated as a result of a hazardous materials incident occurring at this facility.

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:**

Copeland Park, Riverside Park, Myrick Park, the La Crosse River Bike Trail, the UW-La Crosse Athletic Fields, and many other recreational sites are nearby seasonal usage areas. The two local hospitals and the various clinics may have thousands of employees and patients on premises at any given time. In case of an incident, immediate evacuation of a large number of people could be of paramount importance.

The UW-La Crosse, Viterbo University and Western Technical College campuses are within two – three miles of the facility. The Incident Commander should be in contact with campus police or other college officials to evacuate or shelter in place as necessary.

Commercial and recreational boating traffic and marine and wildlife could be affected on Lake Onalaska and the Mississippi, La Crosse and Black Rivers. The Wisconsin Department of Natural Resources, U.S. Coast Guard, U.S. Army Corps of Engineers, and the U.S. Fish and Wildlife Services should be notified to assist with emergency notification, evacuation, environmental and navigational problems.

Wisconsin DNR – La Crosse	608-785-9000
Coast Guard Group UMR	319-524-7511
U.S. Corps of Engineers Lock & Dam #7	507-895-2170
U.S. Fish & Wildlife – Onalaska	608-783-8405

The local 24-hour National Weather Service office, the 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.