

**EPCRA Off-Site Facility Plan  
For  
Logistics Health Warehouse**

**I. FACILITY NAME:**

Name: Logistics Health Inc. Warehouse  
Location Address: 3237 Airport Road, La Crosse, WI  
Phone Number: 866-284-8788  
Facility ID # Assigned by WEM: 020042-0

**II. FACILITY EMERGENCY COORDINATOR: ALTERNATE COORDINATOR:**

Name: Jennifer Hanifl	Name: Paul Anderson
Position: Director	Position: Consultant
Telephone Number: 866-284-8788	Telephone Number: 612-518-5028

**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>
7664-93-9	Sulfuric Acid	501 lbs	.1 mile	Rural

**IV. PRIMARY EMERGENCY RESPONDERS:**

La Crosse Fire Department  
West Central Regional Type I Hazardous Materials Response Team  
La Crosse Type II Hazardous Materials Response Team  
La Crosse Police Department  
Tri-State Ambulance Service  
La Crosse County Emergency Management  
Wisconsin Department of Natural Resources

**V. SUPPORT AVAILABLE FROM FACILITY:**

*LHI Distribution Operations Center provides a Chemical Spill Kit for clean-up in the event of a spill – Butyl II gloves, masks & filters, wipes, plastic disposal bags, etc.*

*SOP Chemical Spill – Sulfuric Acid*

*MSDS Lead Acid Battery*

**CHEMICAL EMERGENCY MONITORING EQUIPMENT:**

weather equipment:  
pH meters (fixed or portable):

**PERSONAL PROTECTIVE EQUIPMENT:**

positive pressure respirators:  
boots and gloves:  
helmets with eye protection:

**OTHER EQUIPMENT/SUPPLIES:**

foam:  
sand: bags of sand  
other absorbents:  
other equipment/supplies:

**OUTSIDE RESOURCES AVAILABLE:**

La Crosse County does have a Type II Hazardous Materials Response Team. For Type I incidents, contact the West Central Wisconsin 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.

This facility is used to store medical products. Electric forklifts and pallet movers are used within the facility. Back-up electric power generators have automotive-type batteries. Back-up electric power uninterruptible power supply devices used large industrial batteries.

### B. Greatest potential for release.

The greatest potential for release of sulfuric acid from electric storage batteries would occur during routine maintenance procedures. It is unlikely the entire quantity of sulfuric acid could be released unless catastrophic destruction of the facility were to occur.

### 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.

Based on the quantity of battery electrolyte solution in the largest industrial battery used as this facility, the hazard analysis is as follows:

EHS Chemical: Sulfuric Acid  
Form: Liquid, Powder in solution, Solid, Gas, Granular  
Container Size: 2142 lbs.  
Concentration: 9 %  
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: .1mile

**RE-EVALUATION SCENARIO:**

Rural  
Wind Speed: 11.9 mph  
Atmospheric Stability Class: D  
Vulnerability Zone: .1 mile

It is estimated that only those persons in the immediate area of the facility may be affected by an accidental release of sulfuric acid.

- D. Possible limitations or problems that could arise.  
Adjacent business may need to be notified of a release of sulfuric acid.
- E. Estimate of population affected.  
The MARPLOT population estimate calculation indicates no persons within the .1 mile vulnerability zone. However, aerial photography indicates at least 5 homes may lie within the zone just to the west of the facility. For planning purposes, consider an estimated population of few than 20 people.
- F. Conclusions.  
A release of sulfuric acid is always calculated to have a vulnerability zone of .1 mile, regardless of quantity or environmental factors, such as wind speed. It would be nearly impossible to release the entire quantity of sulfuric acid found at this facility.

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

## **X. SPECIAL CONSIDERATIONS:**

### **A. Limited access to facility**

This facility is located on an island in the Mississippi River. The island is bisected east/west by Interstate Highway 90. Only two local roads cross I-90 and could be used as access/egress routes.  
(Dawson Avenue and Lakeshore Drive)

### **B. Address environmental concerns at facility and in Vulnerability Zone**

The .1 mile vulnerability zone does not extend into any waterways.

### **C. Actual response capabilities at facility**

The facility has limited capabilities for managing a sulfuric acid spill.

### **D. Potential for affecting other jurisdictions**

Although the facility is located within the City of La Crosse, portions of the small vulnerability zone extend into the Town of Campbell.

**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.