

**EPCRA Off-Site Facility Plan
For
Mcloone Metal Graphics Inc.**

I. FACILITY NAME:

Mcloone Metal Graphics, Inc.
75 Sumner Street
La Crosse, WI 54603
Phone Number: 608-784-1260
Facility ID # Assigned by WEM: **014494-7**

II. FACILITY EMERGENCY COORDINATOR: ALTERNATE COORDINATOR:

Name: Keith Rosenthal
Position: Vice President of Manufacturing
Telephone Number: 608-784-1260
24 Hour Phone: 608-790-1377

Name: Wade Brown
Position: Engineering Services Manager
Telephone Number: 608-784-1260
24 Hour Phone: 608-518-1551

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>
4098-71-9	Isophorone Diisocyanate	435 lbs. (Under TPQ)	>10 miles	Rural
7664-93-9	Sulfuric Acid	1670 lbs.	.1 mile	Urban

OTHER HAZARDOUS CHEMICALS:

<u>Name</u>	<u>Max. Quantity</u>
None	

IV. PRIMARY EMERGENCY RESPONDERS:

La Crosse Fire Department
West Central Regional 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:

The facility has the spill response capacity for greater than 200 gallons, including 3 50-gallon spill response kits, numerous smaller response kits, and additional spill absorbance material.

The facility also has two forklift battery response kits, each able to neutralize 2 gallons of battery acid. These are kept in the battery recharge areas.

CHEMICAL EMERGENCY MONITORING EQUIPMENT:

None

PERSONAL PROTECTIVE EQUIPMENT:

OTHER EQUIPMENT/SUPPLIES:

Three 50-gallon spill response kits

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).

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)

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."

VII. HAZARD ANALYSIS SUMMARY:

A. Brief description of facility.

From the facility's website: *Mcloone is an award winning manufacturer of custom decals, nameplates and pressure sensitive labels. Founded in 1954 by James E. Mcloone, we are now recognized as one of the world's leading providers of high-quality identification graphics.*

Mcloone offers a wide array of product choices: metal labels and nameplates, vinyl decals, self-adhesive vinyl labels, asset tags, metal signs, POP enhancements and polycarbonate identification graphics.

Mcloone cares about the environmental impact our industry and our organization has on our community and our planet. We have eliminated lead-based paints, reduced volatile emissions in our manufacturing process and improved our wastewater output. Because of our efforts, Mcloone was proud to be awarded the 2009 Wisconsin Partners for Clean Air award.

Industrial forklifts are used throughout the facility powered by industrial batteries. The battery electrolyte solution contains sulfuric acid.

ISOPHORONE DIISOCYANATE is used at this facility to make polyurethane coatings. Although this is listed as an EHS, it is stored in a quantity below threshold for planning (TPQ). The CAMEO calculated vulnerability zone for this chemical is >10 miles.

- B. Greatest potential for release.
As with most industrial electric forklifts, the greatest potential of release would occur during the routine maintenance or movement of the forklift batteries. The forklifts are used throughout the facility. Isophorone Diisocyanate may be released during shipping/receiving operations or while being used during industrial applications.
- 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).

The hazard analysis is as follows:

EHS Chemical: Sulfuric Acid
Form: Liquid
Container Size: 2500 lbs.
Concentration: 10-30 %
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: .1 miles

RE-EVALUATION SCENARIO:

Urban
Wind Speed: 11.9 mph
Atmospheric Stability Class: D
Vulnerability Zone: .1 miles

It is estimated that up to 77 people may be affected by an accidental release of sulfuric acid.

- D. Possible limitations or problems that could arise.
None noted.
- E. Estimate of population affected.
Using Census Block information, the MARPLOT software produced a population estimate of 77 persons and 62 households within the .1 mile vulnerability zone.
- F. Conclusions.

Sulfuric acid, found in electric battery electrolyte, is used in many industrial facilities. However, spills are rare and are usually managed by facility personnel. The EPA 's determination of a .1 mile vulnerability zone for sulfuric acid, regardless of quantity, significantly reduces the need for most off-site emergency planning.

VIII. SPECIAL FACILITIES AFFECTED:

A. Name of facility, Address, Contact Phone number, and # of people affected

The Tri-State Ambulance Service is located within the .1 mile vulnerability zone at 235 Causeway Boulevard. The facility may be contacted by two-way public safety radio, direct link to the County Dispatch Center computer system (CAD), or by telephone. Fewer than 10 people would be in the facility. Telephone: 608-784-4997

The La Crosse Day Care – Head Start facility located at 333 Buchner Place, is approximately 2 blocks north of the facility and has an average daily population of about 15 children. Telephone: 608-784-9533

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

Sumner Street is located in a mixed commercial/residential area along the La Crosse River 'causeway'; which is a narrow raised land mass separating downtown La Crosse from the area formerly known as "North La Crosse". This corridor suffered significant

flooding during the 1965 Mississippi River flood, prior to the development of levees and other flood protection measures. Recent high water levels on the Mississippi River have not caused transportation or access issues at this facility.

- B. Address environmental concerns at facility and in Vulnerability Zone
Both the Mississippi River and the confluence with the La Crosse River lie within a few blocks of this facility. A release of EHS into storm drains could result in the pollution reaching the Mississippi River.
- C. Actual response capabilities at facility
The facility has the spill response capacity for greater than 200 gallons, including 3 50-gallon spill response kits, numerous smaller response kits, and additional spill absorbance material.
The facility also has two forklift battery response kits, each able to neutralize 2 gallons of battery acid. These are kept in the battery recharge areas.
- D. Potential for affecting other jurisdictions

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.

XII. DISTRIBUTION LIST:

La Crosse County Local Emergency Planning Committee
La Crosse Fire Department
Mcloone Metal Graphics, Inc.
Wisconsin Emergency Management