

EPCRA OFF-SITE PLAN FOR
 Metallics Inc.
 W7274 County Road Z
 Onalaska WI 54650

Facility has requested CONFIDENTIAL (non-disclosure) location of chemicals

I. FACILITY NAME:

Metallics Inc.
 W7274 County Road Z
 Onalaska WI 54650-0099
 608-781-5200
 Facility ID # Assigned by WEM: **002288-8**

II. FACILITY COORDINATOR:

Charles M. Snapp
 E- Manager
 Telephone Number:
 608-781-5200 (work)
 608-783-7817 (home)
 Cell: 608-317-8613

ALTERNATE COORDINATOR:

John Butman
 Emergency Coordinator
 Telephone Number:
 608-781-5200 (work)
 Cell: 608-317-0000

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>
7664-39-3	Hydrofluoric Acid (49%)	375-lbs.	2.4 miles	Rural
7697-37-2	Nitric Acid	465-lbs.	<0.1 mi.	Rural
(NOTE: Nitric Acid is under TPQ of 1,000 lbs.)				
7664-93-9	Sulfuric Acid (93%)	920-lbs.	<0.1 mi.	Rural
(NOTE: Sulfuric Acid is under TPQ of 1,000 lbs.)				

OTHER HAZARDOUS CHEMICALS:

1305-62-0	Hydrated Lime	47,400-lbs.		
74-98-6	Propane	44,720-lbs.		
7775-09-9	Sodium Chlorate (46%)	1,800-lbs.		
7705-08-0	Ferric Chloride	6,400-lbs.		
7647-01-0	Muriatic Acid 20 Deg. (37% Hydrochloric Acid)	3,200-lbs.		

IV. PRIMARY EMERGENCY RESPONDERS:

West Central Regional Type I Hazardous Materials Response Team
 La Crosse County Type II Hazardous Materials Response Team
 Holmen Fire Department
 La Crosse County Sheriff's Department
 La Crosse County Emergency Management
 Wisconsin State Patrol
 Wisconsin Department of Natural Resources
 Tri-State Ambulance
 Brice Prairie EMS First Responders

V. SUPPORT AVAILABLE FROM FACILITY:

Facility crew has been trained for placement of sodium bicarbonate solution on small spills due to handling.

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	1-800-424-9300
Georgia-Pacific	1-206-733-4410
Hydrite Chemical Co.	1-414-257-2300
RESCO Inc.	1-800-669-4162

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:

Metallics, Inc. could have upwards of 200 employees during a spill event. The facility is located on County Highway "Z" west of Wisconsin State Road 35 in the Town of Onalaska. The geographic area is known as Brice Prairie and extends westward into Lake Onalaska. The facility is north of the City of Onalaska and south of the Village of Holmen. Metallics, Inc. produces name plates and decals for various products. The hydrofluoric, nitric and sulfuric acids are used to etch metal plates and labels.

Potentially dangerous materials are used and stored in 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 for release would be the loading and unloading of the carboys and 55-gallon drums.

The vulnerability zones for a release of **hydrofluoric acid** from one carboy container were computed using CAMEO software. The parameters used were as follows:

EHS Chemical:	Hydrofluoric Acid
Form:	Liquid
Container Size:	72 lbs (15 gallon carboy)
Concentration:	49%
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:	2.4 miles
RE-EVALUATION SCENARIO:	
Rural or Urban:	
Wind Speed:	11.9 mph
Atmos. Stability Class:	D
Vulnerability Zone:	0.5 mile

Calculation: 9.8 lbs./gal X 15 gallon capacity carboy = 144 X .49 (49% solution) = 72 lbs.
 Although the maximum amount of hydrofluoric acid found in the three containers would be 216

lbs., at least one of the containers will be less than full at any given time. It is highly unlikely that all three carboys would be completely full as this substance is used daily at this facility. As one container is emptied another container would be used while the empty container is sent to be refilled.

There are approximately 11,398 residents within 2.4 miles radius of this facility.

The vulnerability zone for a release of **nitric acid** was computed using CAMEO software. The parameters used were as follows:

EHS Chemical:	Nitric Acid (<40%)
Form:	Liquid
Container Size:	165-lbs. (carboy)
Concentration:	40%
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:	0.1 miles
RE-EVALUATION SCENARIO:	
Rural or Urban:	Rural
Wind Speed:	11.9 mph
Atmos. Stability Class:	D
Vulnerability Zone:	0.1 miles

Only the employees within the immediate vicinity of a release would be affected.

The vulnerability zone for a release of **sulfuric acid** was computed using CAMEO software. The parameters used were as follows:

EHS Chemical:	Sulfuric Acid
Form:	Liquid
Container Size:	230-lbs. (carboy)
Concentration:	93%
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:	B
Vulnerability Zone:	<0.1 miles
RE-EVALUATION SCENARIO:	
Rural or Urban:	Rural
Wind Speed:	11.9 mph
Atmos. Stability Class:	D
Vulnerability Zone:	<0.1 miles

Only the employees within the immediate vicinity of a release would be affected.

Ferric Acid is used in the waste water treatment process and does not have EPCRA regulatory limits. The other listed substances are used in the metal etching processes and are not subject to EPCRA regulatory limits on quantity.

VIII. SPECIAL FACILITIES AFFECTED:

There are nearly 50 special facilities within the vulnerability zone for the EHS chemicals present at this facility. Refer to the Special Facilities attachment for a comprehensive listing of these facilities.

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 near the north shore of Lake Onalaska (Mississippi River dam pool #7). Commercial and recreational boating and fishing occurs within the 2.4 mile vulnerability zone. Notification of an emergency situation to anyone on Lake Onalaska could occur via the Marine Band radio.

A nearly 8 mile stretch of the Great River Bike Trail extends through this area. Notification of recreational users of this trail could be problematic.

The north portion of the La Crosse Airport lies within the 2.4 mile vulnerability zone, but not the Terminal Building, Control Tower, or Airport Fire Department.

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 general 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 highway for which weight limits are met.