

EPCRA OFF-SITE PLAN FOR

Torrance Casting, Inc
3131 Commerce Street
La Crosse, WI 54603-1756

I. FACILITY NAME:

Torrance Casting, Inc.
3131 Commerce St.
La Crosse, WI 54603-1756
608-781-0600
Facility ID # Assigned by WEM: **002808-8**

II. FACILITY COORDINATOR:

William Torrance
President
608-781-0600 (W)
608-786-1789 (H)

ALTERNATE COORDINATOR

Joe Woolever
Maintenance Manager
608 -781-0600 (W)
608- 415-2069(H)

III. CHEMICALS ON SITE: EXTREMELY HAZARDOUS SUBSTANCES

<u>CAS#</u>	<u>Trade Name or Chemical Name</u>	<u>Max. Amt.</u>	<u>Container Size</u>	<u>Vulnerability Zone</u>
007664-93-9	Sulfuric Acid	1, 957 - lbs	55 gal	<u><.1mi</u>

OTHER HAZARDOUS CHEMICALS:

014808-60-7	Crystalline Silica (Badger FW80)	260,060 – lbs.
N/A	Additrol Blends	72,900 – lbs.
007722-84-1	Hydrogen Peroxide 34%	1,531 – lbs.

Other materials present and reported on the Tier Two Inventory:

Scrap Steel – 240,526- lbs.
Sorel (nodular) pig iron – 82,480- lbs.
Basic Pig Iron - 84,960- lbs.
Bessemer Pig Iron - 65,260- lbs.
Propane – 16,800 – lbs.

IV. PRIMARY EMERGENCY 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 AVAILABLE FROM FACILITY

A supply of Soda Ash is kept on hand to use in the event of an acid spill. The facility maintenance personnel respond to all chemical spills.

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
Hydrite Chemical Inc.	608-784-0024

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 operation procedures as well as the County's Emergency Operation 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:

Torrance Casting, Inc. does job shop casting work. From the www.torrancecasting.com web site:

Iron types poured include; gray, ductile, austempered ductile, and Ni-hard iron castings up to 500 lbs. Product areas are; engine and motor housings, valve bodies, wear plates, flywheels, fire hydrant parts, pistons, gear blanks, water cooled exhaust manifolds, power transmission components and air conditioning unit headers. Services listed; squeezer, cope & drag and automatic green sand mold production, cold box, oil sand

and shell core production, induction melting, complete casting cleaning, sand control testing, casting inspection, bar coding, prototype and pattern equipment production, and powder coating systems.

They employ about 92 people. Approximately 65 persons would be on duty during a typical day shift, 18 persons during the afternoon shift, and 9 persons during the overnight shift. The most likely occurrence of a spill or release would be in the handling of the 55 gal drums of 35% sulfuric acid solution.

The drums are stored in two containment areas (mini scrubbers). One mini-scrubber device will hold 230 gallons of liquid and stored in this area is one drum of acid that is in use and another drum that is a spare drum (110 gals.). An expanded metal cage that is not locked protects the idle side of this containment area. The cage is removed to change barrels.

A second mini scrubber system is installed north of this system holding 135 gallons of liquid. For this system the drum is transported to the system and put in a plastic container that can hold all 55 gallons of acid should the drum leak. Also, under the scrubber tank there is another plastic container that can hold the entire product in the scrubber should there be an emergency situation that would require draining the entire system.

All barrels of acid are stored in these two areas; they are put there when they are delivered to the site.

In both systems that acid is added via an automatic pump to water in the scrubber to bring the water down to a PH of 4. This solution is then used to scrub Triethylamine gas out of the air and the air is returned to the plant.

The neutralized scrubber waste is put into a tote holding up to 2,500 lbs. This tote is removed for disposal by Hydrite Chemical.

All other sulfuric acid is contained in batteries, 6 of which are fork-lift batteries ranging in size from 136 lbs of 38% sulfuric acid solution to one with 172 lbs of the 38% solution.

There are four 1000 gallon LP tanks west of the building used for emergency heat for the foundry operations, if needed.

A KNOX BOX is installed to allow Fire Department access to the locked building.

The vulnerability zones for this facility were based on a worst case scenario for a release of a 55 gallon drum of sulfuric acid. The hazard analysis, using CAMEO software, is as follows:

EHS Chemical:

Sulfuric Acid

Form: Liquid
Container Size: 55 gallons (825 lbs)
Concentration: 35%

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: Urban
Wind Speed: 11.9 mph
Atmos. Stability Class: D
Vulnerability Zone: < 0.1 miles

VIII. SPECIAL FACILITIES AFFECTED:

Special Locations:

None

IX. POPULATION PROTECTION

Refer to the La Crosse County Emergency Operations Plan, Annex E, for information on evacuation and sheltering.

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 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.

X. SPECIAL CONSIDERATIONS:

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.

DISTRIBUTION LIST:

La Crosse Fire Department

La Crosse County Local Emergency Planning Committee

Wisconsin Emergency Management