

**EPCRA OFF-SITE PLAN  
UNITED RENTALS  
(Formerly :RSC EQUIPMENT RENTAL #251)  
2809 LARSON STREET  
LA CROSSE, WI 54603**

**NOTE: Name change to United Rentals – 2012  
On April 30, 2012, United Rentals, Inc. completed the acquisition of RSC Holdings, Inc.  
("RSC").**

**I. FACILITY NAME**

RSC Equipment Rental #251  
2809 Larson Street  
La Crosse, Wisconsin 54603  
608-781-7671  
Facility ID # Assigned by WEM: 019534-6

**II. FACILITY COORDINATOR**

Patrick Thurman, Manager of Environment  
480-226-6047  
24-hr. Phone: 866-665-2266

**ALTERNATE COORDINATOR**

Mary O'Shaughnessy  
602-567-3872  
24-hr. Phone: 866-665-2266

**LOCAL FACILITY MANAGER**

Barry Meyers  
Office: 608-781-7671  
Cell Phone: 608-792-1388

**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	1,666 pounds	<.01 mile	Urban

**OTHER HAZARDOUS CHEMICALS**

Diesel fuel, LP gas, used motor oil, cleaning solvent, acetylene and oxygen for welding equipment, and gasoline. None of these chemicals are present in quantities that exceed threshold levels for reporting or planning facilities.

**IV. PRIMARY EMERGENCY RESPONDERS**

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

**V. SUPPORT AND RESOURCES AVAILABLE FROM FACILITY**

This facility maintains an oil spill containment kit and has absorbent materials available for battery acid spills.

## VI. 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 Response Team through the Wisconsin Emergency Management Duty Officer (1-800-943-0003).

CHEMTREC                      800-424-9300  
HYDRITE CHEMICAL        608-784-0024

## VII. GENERAL INFORMATION/ 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)

**VIII. HAZARD ANALYSIS SUMMARY:**

RSC Equipment Rental #251 is a local franchise of the RSC Equipment Rental, 6929 East Greenway Parkway, Suite 200, Scottsdale, Arizona and is a provider of rental equipment, primarily for construction, industry and institutions such as shopping malls and sports arena. Equipment that is provided ranges from hand tools to earth moving equipment and aerial work platforms. There are one part-time and six full-time employees.

The EHS present at this facility, sulfuric acid, is found in electric storage batteries that are installed in rental equipment. Although the total amount of EHS exceeds threshold limits, it is extremely unlikely that all of the rental equipment that contains electric storage batteries with sulfuric acid would be present at this facility at one time. Typical on-site equipment levels would be approximately 10 pieces of equipment during any 24 hour period. Each equipment unit contains a set of 4 batteries.

It was determined that the greatest risk of a chemical incident would occur during the handling and maintenance (recharging) of the equipment batteries. Usually no more than four batteries are being charged at one time.

RSC Equipment Rental #251 shares a building with the Courtney Company. Courtney Company is a retailer of industrial batteries. Consequently, the RSC Equipment Rental #251 does not routinely service or store batteries. They are available as needed in the adjacent business.

The hazard analysis for this facility is based on an accidental release of sulfuric acid contained in two batteries from one rental equipment device.

The hazard analysis is as follows:

EHS Chemical: Sulfuric Acid

Form: Liquid

Container Size: 16.2 lbs. (8.1-lbs. electrolyte per battery, 2 batteries)

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

Atmospheric Stability Class: F

Vulnerability Zone: <.01 miles

RE-EVALUATION SCENARIO:

Rural or Urban: Urban

Wind Speed: 11.9 mph

Atmospheric Stability Class: D

Vulnerability Zone: <.01 miles

It is estimated that only the employees and any clients of this and the adjacent facility would be affected by an accidental release of Sulfuric Acid in the form of battery electrolyte solution.

## **IX. SPECIAL FACILITIES AFFECTED**

### Government Facilities

None.

### Schools

Western Technical College – Automotive/Diesel Technology Center is located at 2719 Larson Street. 608-785-9246.

### Health Care Facilities and Nursing Homes

None.

### Day Care Centers

None

### Other

ORC Industries is located at 2700 Commerce Street. A small portion of this building lies within the .1 mile vulnerability zone for Rental Service Corp. ORC employs disabled persons and may need to be notified of any release of sulfuric acid.

**X. 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.

**XI. SPECIAL CONSIDERATIONS**

The vulnerability zone for sulfuric acid is always <.1 mile, no matter the quantity or method of release. Although the total amount of EHS for this facility is greater than the threshold amount, which results in the requirement for this off-site plan, it is not likely that significant amounts of sulfuric acid found in storage batteries from rental equipment would be present at any given time.

A nearby bicycle and recreational use trail is located approximately 1/2 mile east of this facility. This is a lightly traveled connection between the Great River Trail (Onalaska to Trempealeau) and the La Crosse River Trail (La Crosse to Sparta). Users of the trail may need to be alerted if traffic routes are closed and a large scene perimeter is established in response to a hazardous materials event at this facility.

The closest day care center, Cargill Family Child Care, is located .6 mile due west and the YMCA School Age – Roosevelt child care facility is approximately ¾ mile South-Southwest. Response activities, including traffic re-routing, would not likely result in significant access challenges to either of these Special Facilities.

**XII. DISTRIBUTION LIST**

United Rentals  
La Crosse Fire Department  
La Crosse County Local Emergency Planning Committee  
Wisconsin Emergency Management West Central Regional Office

**XIII. TRANSPORTATION INFORMATION**

This facility is located in the heart of the City of La Crosse north-side industrial complex and can be accessed via truck routes and railroad. Access routes include traveling west of Enterprise Avenue (County Highway SS) from State Highway 157, south on Oak Avenue South in Onalaska then east on Enterprise Avenue to Larson Street or from the south on River Valley Drive. River Valley Drive is easily accessed from State Road 16 via County Road B (Gillette Street). These same access routes will serve as the evacuation routes, as needed.