

**Richland County LEPC**  
**Meeting Minutes**  
**June 20, 2019**

**Members present:**

Barry Roghair – RCFD	Sean Culver – RCFD
Chris Kanable – ARES/RACES	Kerry Gulsrud – RCRE
Brandon Fetterly – UW Richland	Brian Jones – RCFD
Darin Gudgeon – RCEM	Aaron Sanders – RCRE
Lauren Moe – RCPD	Zach Thayer – Schreiber Foods – East
Paul Theobald – RCRE	Rose Kohout – Richland County H&HS
Sean Gary – Schreiber Foods – East	Kerry Severson – Richland County Board
Steve Krueger – RC Water Utility	John Heinen – JT Heinen Global
Ryan McBride – Schreiber Foods – West	

1. **Meeting called to order** at 6:31PM by Brandon Fetterly.
2. **Proof of notification** provided by Darin Gudgeon.
3. **Motion to approve agenda** by Kerry Severson, seconded by Zach Thayer. Motion carried.
4. **Approval of minutes** from the February 21, 2019, meeting occurred after John Heinen updated the committee that he had added the names of Richland County legislators to the membership list. The names that were added included Travis Tranel, 49<sup>th</sup> Assembly District, Tony Kurtz, 50<sup>th</sup> Assembly District, Todd Novak, 51<sup>st</sup> Assembly District, and Howard Marklein, 17<sup>th</sup> Senate District. After this update, Kerry Severson moved to approve the minutes and Chris Kanable seconded the motion. The motion carried.
5. **Public Comments and Input:** Mr. Heinen offered comments on a Tabletop Exercise that had occurred the day before. The exercise focused on a local response to a chlorine spill. The event was deemed beneficial and provided learning opportunities for participants. A Functional Exercise will be scheduled in the near future. It was noted that telephone and radio traffic will be a component of the upcoming event. Lyle Kratochwill, The Richland Hospital, will be contacted to discuss the facility's involvement in the exercise. Pine Valley Community Village may be contacted as an alternate location. It is expected that the same design team will create the Functional Exercise and some assumptions from the recent Tabletop may be included for plausibility.
6. **New Business:**
  - a) **Approve Updated EPCRA Facility Off-Site Plans:** John Heinen stated that three plans had had substantive changes and two had demonstrated slight deviations. Allied was in its second iteration with changes being apparent in chemistry and in core room operations. Frontier Communications had a new plan. Discussion occurred regarding Schreiber's storage of Sulfuric Acid (Schedule W) in the North Industrial Park. Information regarding this chemical is contained in the facility's Tier II plan. It was noted that the property was a satellite business with some staff onsite and was not a contiguous property. This description may allow the site to be considered a separate reporting facility. Other stored items include forklift batteries and packaging materials. Mr. Heinen shared that a minor risk may be present under the circumstances described. He may roll this information about the satellite location into Schedule W. If the site is included in the facility's total plan, he may need to separate the

property from the plan. Zach Thayer will check on reports. John stated that he will print a WHOPRS inventory and review. If less than 1,000 pounds of the substance is present, then the risk will be minor. If an issue with Wisconsin Emergency Management (WEM) occurs, John will add an addendum to the plan. Darin Gudgeon inquired on whether an EPN had been created. If there were any questions regarding this creation, Dawn at WEM or Susan at Schreiber should be contacted. Darin added that he will provide contact information for WEM.

The discussion then turned to Frontier's new plan which was believed to be similar to the previous Verizon plan. Mr. Heinen said that 1,010 pounds of Sulfuric Acid is present in the basement of the building. The chemical is noted to be in a significant amount of what appear to be gel batteries. If this is the case, the Hazard Risk Analysis is significantly decreased and the risk identified in the plan has been overstated. John reported that he will rewrite the plan if the situation is different than what he believes to be true. It was stated that Brian Jones, Richland Center Fire Department (RCFD) Chief, has inspected the site once and will conduct a second tour as soon a supervisor can be contacted to schedule a visit. John Witt is the local supervisor and Jason Weller is the Frontier EH&S Manager in Dallas, TX. The committee was asked if the plan should be approved as written. John said that the greatest risk in the plan could be reviewed every year but if issues arise, the entire plan could be reviewed annually. At this time, Zach Thayer moved to approve the current plan and Kerry Severson seconded. There was no discussion and the motion carried.

Allied's plan was next on the list. Mr. Heinen confirmed that significant changes have occurred at the facility in the past twelve months. He spoke to legacy staff, Dave Lomas and Ron Manning, to obtain details surrounding the changes. The plant has retained the services of engineering consultants (Pollution Technology, Inc. for Title V and National Consulting for EPCRA) to provide guidance on operations. John noted that Sulfuric Acid is present in that amount of 1,100 pounds at the site. Phenol, 2,000 pounds at a 2% concentration, is also present. This amount of Phenol constitutes an incidental risk. The vulnerability zone is primarily in the plant and would be 0.05 of one mile in radius. There is another substance present, however, that would pose a more significant risk. Furfural, an organic compound (aldehyde) produced from the dehydration of sugars from bran, corncobs, etc., in concert with the Phenol and high temperatures, could create a reaction where significant heat is produced. Self-acceleration during the reaction would drive the creation of more heat. Furfural is present in a bulk tank and in several totes. It is stored separately from any quantity of Sulfuric Acid. The foundry is owned by a Chinese firm and the owner is a metallurgist. As a result, the plant adheres to strict guidelines in its operations. The RCFD toured the facility two weeks ago and found the risk level to be low at the time. Ron Manning advised Mr. Heinen that there is a 30,000 gallon tank of propane on the property. It was 38% full and contained 49,800 pounds of liquid gas. In this scenario, a half mile blast zone could be expected if the gas ignited from a BLEVE condition. Additionally, Toluene Sulfonic Acid is present at the site and is contained in totes in the amount of 41,500 pounds. A two-tenths of a mile impact could occur if it reacted with any of the resins or strong bases. Other chemicals are stored in smaller amounts at the plant and were not discussed in detail. John shared that the foundry has plans to expand the core room and may switch to a DMEA operation with a gas catalyst (amine gas) which would be volatile. This plan is reviewed annually given the presence of more dangerous chemicals on site and the proximity of Doudna Elementary School and several retail businesses to the plant. At this time, Brian Jones moved to approve the plan and Kerry Severson seconded the motion. There was no discussion and the motion carried.

Schreiber East's plan will be signed by Sean Gary. Contacts have been changed on the report and there have been increases in the amount of Anhydrous Ammonia on site (an additional one ton of the substance is present). According to Mr. Heinen, having more material will cause an incident to last longer and will not necessarily result in a larger area of impact. Staff from Schreiber East reported that

the plant expects to keep Anhydrous Ammonia at a level of 18,800 pounds. Acid volumes have changed due to plant operations as evidenced by decreases in Sulfuric Acid and Nitric Acid. Nitric Acid is being used in sanitizing processes. There are 19,400 pounds of Sodium Hydroxide (base) on site. If lead-acid batteries come into contact with this substance, a release of Lead and Antimony could occur and a situation of this type presents a fairly high risk of heavy metal exposure. Lead/Antimony industrial hygiene toxicology is not part of the current facility plan hazard analysis. John inquired on whether Peracetic Acid is being utilized at the plant. Staff replied that, at this time, there is no Peracetic Acid on site, only Acetic Acid. If Peracetic Acid is added to the facility's inventory, John will review the Off Site Plan and make recommendations. Other chemicals are stored at the plant, including 1,400 pounds of Sodium Hypochlorite, also used for sanitation. This amount of Sodium Hypochlorite would produce a less dangerous hazard zone. At this time, Ryan McBride moved to accept the plan as written and Sean Culver seconded. No discussion occurred in response and the motion carried.

Schreiber West submitted a Tier II report with an amendment regarding the dry storage warehouse on East Robb Road this year but did not do so last year. The facility has a WEM number (201988), but no EPN identifier. The plan takes large lead-acid batteries into account, distributed throughout the facility, the charging station being the hub. Ryan McBride will review and sign the Schreiber West plan. Mr. Heinen noted that an average of 40,704 pounds of Ammonia is currently being stored and the plan states that up to 55,448 pounds could be stored – per design specs. This would be considered the facility's maximum inventory for the substance. This amount of Ammonia would increase the impact zone by 15 yards and increase the duration of an event by 35 minutes. It was noted that a Tier II plan should represent actual inventory. The plan states there are 11,805 pounds of Sulfuric Acid primarily stored in batteries and 2,851 pounds of Nitric Acid on site, down from 9,905 pounds previously. John reported that Nitric Acid, in this amount, would create a 0.05 mile hazard zone. Other chemicals in smaller amounts are present but were not explored in detail. Mr. Heinen informed Schreiber West staff that if Peracetic Acid is added to inventory, the committee should be notified and the plan would be updated accordingly. Approval of the plan was sought at this time. Zach Thayer moved to accept the plan and Kerry Severson seconded. The motion carried after no discussion occurred.

The Foremost Farms Off-Site Plan was then explored. John Heinen reported that the facility has adjusted the acids on hand with there being a significant increase in Peracetic Acid and a decrease in Sulfuric Acid. With regard to Peracetic Acid, it was noted that the substance is corrosive and when exposed to fire, creates its own oxygen a source which further accelerates the burning process. In the event that a situation such this occurs, responders should know the location of the chemical in the facility and should be cautioned to keep their distance as off gassing of the substance creates a considerable hazard. Mr. Heinen indicated that he was unsure of which vendors/manufacturers serve Foremost Farms and provide chemicals to the site. Other substances of note included 80,000 pounds of Nitric Acid which would create a half-mile vulnerability zone. Approval of the plan was sought and in response, Brian Jones moved to accept the plan with Zach Thayer seconding the motion. No discussion occurred and the motion carried.

At Alcam, some personnel changes have occurred which could impact the EPCRA plan. Chan Wood is the current contact at the plant and John met with him during a recent visit. Employees involved in safety take the Off-Site Plan very seriously. Chemicals such as Peracetic Acid, Anhydrous Ammonia and Lactic Acid are stored onsite and rooms for each are identified with NFPA 704 markings. A four tenths of a mile hazard zone was calculated based upon the types and amounts of chemicals present at the facility. Ryan McBride moved to accept the plan and Zach Thayer seconded. No discussion occurred in response and the motion carried.

Premier Cooperative has changed some of herbicides it uses and, based upon which weeds are presenting to be most problematic, the types of chemicals ebb and wane. Herbicides to curb the effects of Palmer Amaranth are some of the strongest. Like herbicides, pesticide inventories change as the burden of insects is identified. Crop inputs (fertilizers, seed, etc.) are onsite in varying amounts depending on the time of year. Premier is a petroleum distributor and has a tank farm on the campus. Mr. Heinen reported that Shawn Teska is Premier's contact for all petroleum-related questions/concerns. If there is a change in fuel storage and distribution, a tour involving the Richland Center Fire Department will occur and that the plan will be reevaluated on the fuel side. This plan is reviewed on an annual basis.

The discussion turned to Richland Center Utilities city wells 6, 7, and 8. The plan was reviewed based upon which chemicals are on site and building configurations. Three hundred pounds of Chlorine is present and a three quarter of a mile consequence zone was calculated as a result of this substance being onsite. No SCBA is available at the facilities and responders would need to be aware of the impact it would have on response activities. After the report was given, Zach Thayer moved to accept both the Premier and Richland Center Utilities Off-Site plans. Brian Jones provided the second. No discussion occurred and the motion carried.

**7. Meeting adjourned** at 7:57PM as there was no further business.