



NATIONAL POLLUTION DISCHARGE ELIMINATION SYSTEM (NPDES) SPILL PLAN

Date of preparation:

Supersedes:

Facility Information: Milne Fruit Products, Inc.
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Business Owner: Wyckoff Holdings, Inc.

Land Owner: Milne Fruit Products, Inc.
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Bruce DeJong, Plant Engineer 1-509-947-5779 (cell)

Facility Description:

Milne Fruit Products, Inc. (MFP) processes fresh and frozen fruit into NFC or concentrated juices and purees.

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INTRODUCTION/PURPOSE

Milne Fruit Products, Inc, (MFP) is a wholly owned subsidiary of Wyckoff Holdings, Inc. It is the objective of this facility to act as a responsible member of the community, treating both the local citizenry and the environment with respect. This Spill Plan is intended to describe how MFP intends to protect the waters of the State of Washington under the requirements of the National Pollution Discharge Elimination System (NPDES) Permit No. WA-005206-0.

The requirements of this Plan will be met through the implementation of Best Management Practices (BMPs) to identify, reduce, and eliminate potential sources of pollution.

REPORTING SIGNIFICANT SPILLS

All spills, leaks and discharges are to be reported to MFP management immediately. Spills or discharges of reportable quantities onto the ground or into groundwater or surface water must be reported to Department of Ecology officials in a timely manner. Such reports will be made by an official designated by MFP.

See Appendix D for a list of regulatory agencies and contact numbers.

BEST MANagements PRACTICES (BMPs)

A site evaluation was conducted to identify activities with a high potential to contaminate the waste water and/or stormwater system. The results of the evaluation were used to generate procedures that effectively reduce the potential for contamination and protect the environment. These methods or Best Management Practices (BMPs) then become standard operating procedures at this facility.

New processes, equipment or procedural changes are reviewed prior to initiation for potential environmental impact to the stormwater. Any changes to BMPs will be incorporated into this plan.

A current evaluation, with corresponding BMPs, is provided in Appendix A.

POLLUTION PREVENTION TEAM

The pollution prevention team will consist of MFP management representatives, including the Plant Manager, VP of Operations, EHS Supervisor, Plant Engineer, Maintenance Lead and the maintenance mechanics. This team is responsible for:

- Implementation of the NPDES Permit and Spill Plan requirements.
- Development of appropriate goals for the Pollution Prevention Plan.
- Continuous awareness of changes in plant operations that may affect the Spill Plan.
- Conducting twice-yearly inspections to confirm compliance with permit requirements.

SITE MAP

This facility will maintain a current site map related to the storm and industrial sewer systems, and will include the following information:

- Discharge points (outfall).
- Drainage patterns and direction of flow.
- Identification of the types of pollutants likely to be discharge for each drainage area.
- Structural control measures.
- Location of industrial activities (such as loading/unloading, vehicle and/or equipment maintenance areas, waste disposal areas, storage tanks, and parking).
- Surface water bodies receiving stormwater discharges from the site.
- Identification of the storm drains.

See Appendix B for the current Site Map.

MATERIAL INVENTORY

This facility will maintain a list and/or description of all materials (chemicals, oils, products) that are used, stored, or otherwise produced on site, that could be spilled into state waters. This descriptive inventory will be updated as needed to maintain a current list of potential contaminants. Material Safety Data Sheets (MSDS) are available and maintained by the Maintenance Lead and the Plant Manager.

See Appendix C for Material Inventory.

DISCHARGE ASSESSMENTS

In addition to formal daily inspections of the wastewater and stormwater systems, this facility will conduct twice-yearly inspections of the plant site to certify adherence to the Spill Plan. Inspections will be conducted under the following protocols:

Dry Season Inspections:

Dry season inspections will be conducted between May 1st and September 30th, it will include a visual inspection of:

- Process water systems.
- Air Conditioner condensate.
- Non-contact cooling water, which does not require a permit.
- Vehicle wash water.
- Sanitary sites.

Wet Season Inspections:

Wet season Inspections will be conducted between October 1st and April 30th, during a rainfall event. These inspections include observation for the presence of floating materials, suspended solids, oil and grease, turbidity, odor, etc., in the stormwater discharge.

All inspection results and action plans that address corrective action will be maintained by the Operations Assistant.

MONITORING DATA

Sampling and analytical data related to stormwater discharges, groundwater, and/or surface water will be collected and maintained by the Maintenance Lead. Analytical results will be available to the Department of Ecology officials as requested for purposes of the NPDES Permit.

SPILL PREVENTION PROGRAMS

Oils and Lubricants

A. Spill Prevention at Transformers.

1. The electrical transformers are owned and maintained by the Pacific Power Utility District.
2. Protection Barriers are installed around the transformers in order to prevent damage from vehicles.
3. Loss of transformer oil will result in a power outage in the areas that are serviced by that particular unit. The thick, viscous nature of the oil results in a slow migration of oil to low areas. Absorbent materials are readily accessible to contain and absorb a release, should one occur.

Chemicals

A. Spill prevention outside Plant #2.

1. Each drum is protected from spills by a locked sliding door.
2. Spills to the environment from the drums are further protected by containment within the industrial sewer system.

B. Spill prevention inside Plant #2

1. Each drum is protected from spills by a locked gate.
2. Spills to the environment from the drums are further protected by the containment within the industrial sewer system.

C. Spill prevention of cleaning chemicals.

1. Cleaning chemicals are stored in 55-gallon drums at various locations within the processing facility.
2. All drums, stored and in-use, must be placed on protective pallets.
3. Spills of cleaning chemicals within the plant are contained within the industrial sewer system.
4. Acidic cleaning chemicals (unopened) are stored in the Mojo Warehouse or the Johnson Building warehouse, within a designated storage area. The drums are maintained on plastic pallets. There are no drains in the warehouse area. Any spills in this area are to be contained by use of spill dikes and the liquid absorbed with the appropriate medium.

Spill control materials are stored nearby for prompt response and mitigation of a release. See Appendix D for instructions.

D. Spill prevention lube oils and used oils.

1. All new oil is stored in the Briner building in the maintenance area
2. All used oils are stored in the Briner building in a designated area in the back warehouse area.
3. There are no drains in the maintenance area and all spills will be contained by oils absorbing media, such as oil absorbent or PIG absorbent mats.

Spill prevention of finished product

1. Spills within the bulk tank rooms are protected from reaching the environment by containment within the industrial sewer system.
2. Drain blockers are readily available to cover any and all storm drains. In the event of a spill threatening these drains, employees are instructed to immediately cover the drains and initiate clean-up procedures.

EMPLOYEE TRAINING

General Training for all Employees

Training on the Spill Plan and Pollution Prevention Program will be conducted at least annually, or when events indicate a deficiency within the program. The purpose of the training is to create an overall awareness and sensitivity to stormwater pollution prevention concerns. Training will include spill prevention and response, reporting protocols, good housekeeping, and material management practices.

Oil Spill Prevention Training

1. The Maintenance Department is responsible for transfer and storage of oils at the facility,
2. Regular meetings are held within the Maintenance Department to review safe fuel and oil storage procedures, spill response procedures, record keeping, and proper reporting of spills.
3. No employee is allowed to work in or around the oil storage tanks and containers without appropriate training.
4. A call list with phone numbers to report spills is posted in the Maintenance office. This will facilitate prompt reporting of spills. Employees are instructed as to how, what and to whom spills are to be reported.
5. The Plant Manager has been designated as the person responsible for oil spill prevention. This person will maintain familiarity with the Spill Prevention Control and Countermeasures (SPCC) regulation and the MFP SPCC plan.

RECORDKEEPING

MFP will maintain records of spills, leaks, inspections and maintenance activities for at least one year after the permit expires. For spills and leaks, records include the date and time of the incident, weather conditions, cause, and resulting environmental issues (if any). In addition, actions taken to prevent recurrence are documented.

EVALUATION PHASE

At least annually, a qualified person will conduct a site compliance evaluation, which shall include:

- Inspection of stormwater drainage areas for evidence of pollutants entering the draining system.
- Evaluation of the effectiveness of the Best Management Practices (BMPs).
- Observation of structural measures and other stormwater BMPs to ensure proper operation.
- Revising the plan as needed within two weeks of the inspection and implementing any necessary changes.
- Preparation of a report summarizing inspection results and follow-up actions. Such a report will include identification of the inspection date and personnel involved in the inspection.

SPILL REPOSE MATERIAL

Listed below are the amounts and types of materials maintained at this facility to mitigate an oil, fuel, chemical or product spill.

<u>Description</u>	<u>Purpose</u>	<u>Storage Location</u>
Absorbent Booms	Containment	
Absorbent Pads	Absorb oil; clean-up	Rolls of tear-away pads are kept in each engine room and the maintenance shop.
Absorbent Clay	Absorb oil; clean-up	Maintenance Shops
Drain Blocker drain plug (36"x36" mat)	Seal drain covers to prevent contamination of storm and/or first flush sewer.	
Spill Blocker Dike (23" H x 10' L)	Containment	
Shredded Press Paper	Contain and absorb product spills.	

Appendix A: Site Evaluation and Best Management Practices

BMPs- Procedural Controls

<u>Pollutant Source</u>	<u>Activities</u>	<u>BMP</u>
Fruit Juice Concentrate or Puree	<ul style="list-style-type: none"> • Loading/unloading tankers • Transferring juice through header system. • Loading/unloading trucks (drums/pails). 	<ul style="list-style-type: none"> • Inspect hoses, tankers, valves, lines prior to pumping juice. • Ensure drain blockers are in place over storm drains. • Follow proper forklift technique when transporting drums and pallets.
Raw Fruit Thawing	<ul style="list-style-type: none"> • Thawing product on front end pavement. • Temp room thawing. 	<ul style="list-style-type: none"> • All freezer drains are directed to the pond. • Absorbent material readily available. • Remove leaking containers.
Cleaning Chemicals	<ul style="list-style-type: none"> • Draining lines at header systems. • Warehouse Chemical storage. 	<ul style="list-style-type: none"> • Inspect hoses, valves, and lines. • Ensure that hoses are directed toward industrial drain, away from storm drains. • Inspect drums thoroughly prior to placement in storage area; drums must be placed on plastic containment pallets. • Remove leaking drums to plant and/or return to vendor. • Maintain spill materials near storage area.

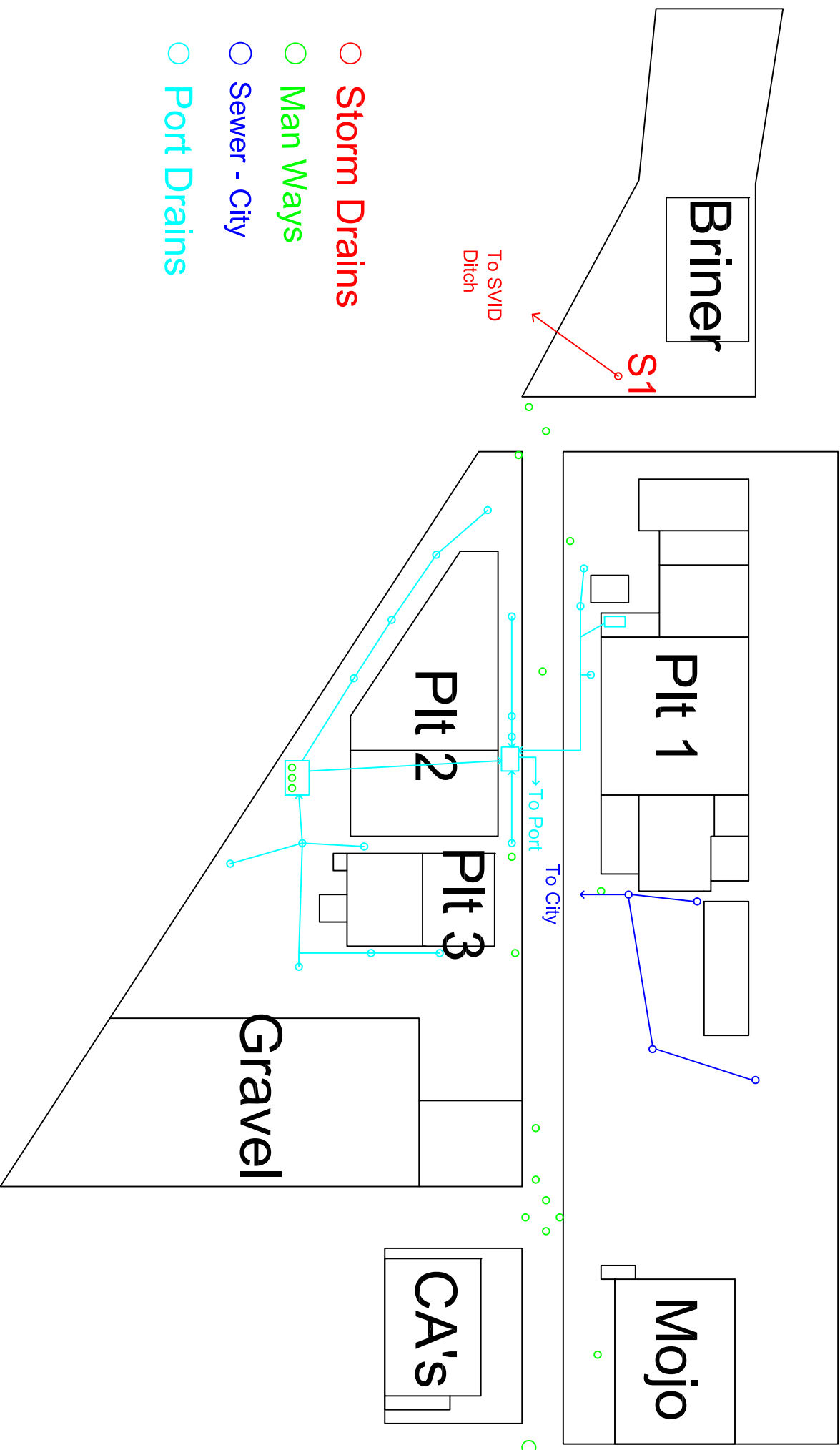
<u>Pollutant Source</u>	<u>Activities</u>	<u>BMPs</u>
Solid Waste (Pomace and perlite)	<ul style="list-style-type: none"> • Parking of full waste trucks. 	<ul style="list-style-type: none"> • Drains in pavement of front receiving area have been converted to industrial drains. • Place drums under dripping trucks to capture significant juice.
Empty Drums and Bins	<ul style="list-style-type: none"> • Storage of drums in boneyard. 	<ul style="list-style-type: none"> • Regular removal or empty drums for recycling. • Rinse drums and bins of fruit residues prior to storage. • Good housekeeping of storage area.
Wooden Pallets	<ul style="list-style-type: none"> • Storage in boneyard. • Debris/wood pieces breaking off of damaged pallets during transport around plant. 	<ul style="list-style-type: none"> • Good housekeeping. • Regular sweeping of pavement. • Remove damaged pallets from production.
Perlite	<ul style="list-style-type: none"> • Spills from broken bags. 	<ul style="list-style-type: none"> • Repair broken bags and clean up spills to pavement. • Rotate stock. • Rinse bags with water at filter to remove excess Perlite.

<u>Pollutant Source</u>	<u>Activities</u>	<u>BMPs</u>
Tartrates/Juices	<ul style="list-style-type: none"> • Tartrate separation process. 	<ul style="list-style-type: none"> • Locate vendor trucks over industrial drains. • Ensure that storm drains are protected with blockers.
Undefined	<ul style="list-style-type: none"> • Periodic inspections of exterior premises. 	<ul style="list-style-type: none"> • Routine inspections to ensure that spills have not occurred and that established BMPs are being followed. • Daily inspections conducted as part of maintenance and management activities.

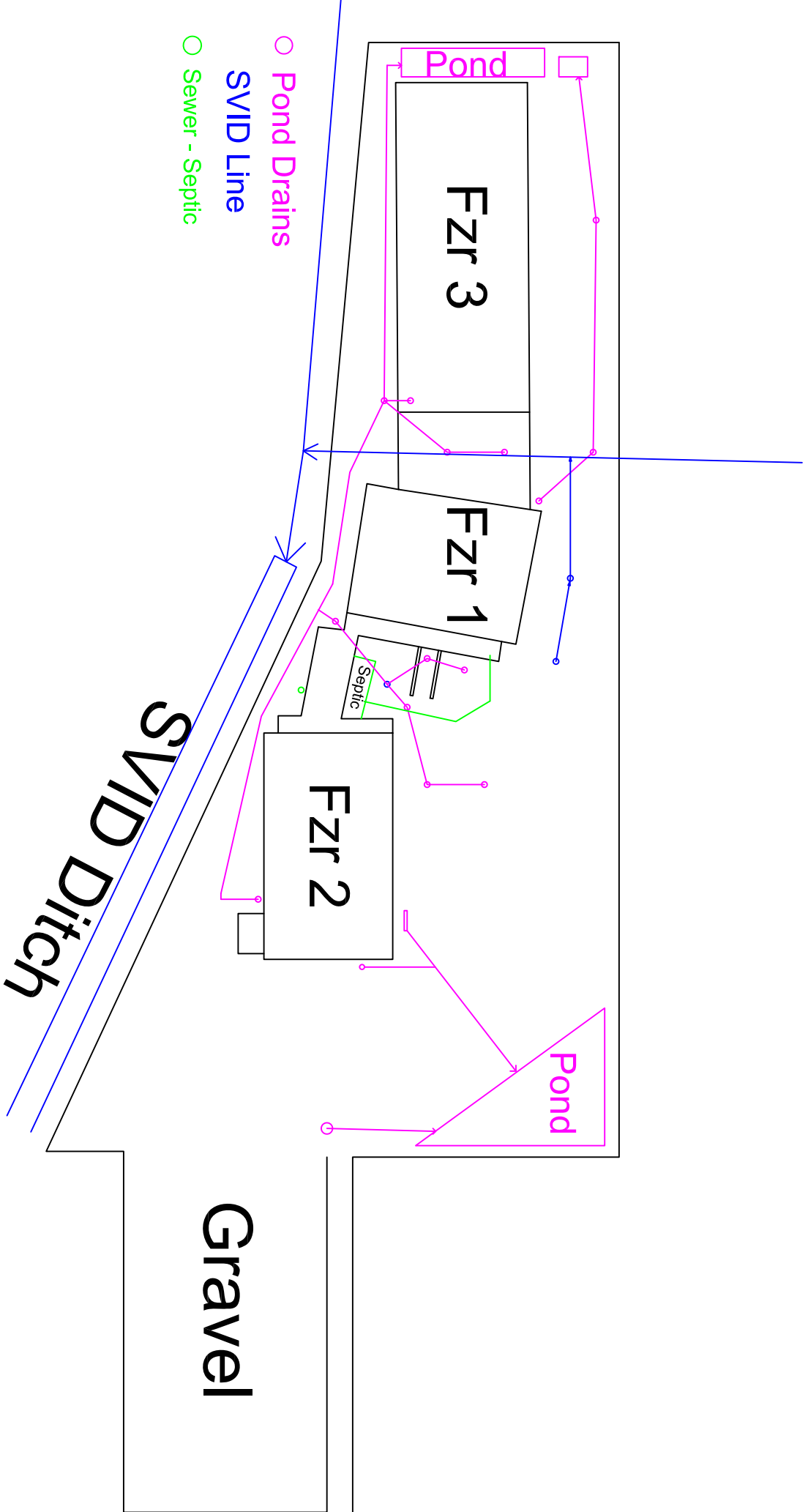
BEST MANAGEMENT PRACTICES: PHYSICAL CONTROLS

<u>Description</u>	<u>Purpose</u>
Roofed and Covered Storage Areas	Physical barrier to prevent precipitation from contacting significant materials (e.g., Perlite, cleaning chemicals, used oil, etc.)
Catch Basins	Structured and installed at the point where the stormwater enters the drainage system and is designed to filter out large particles of debris from runoff. Periodic work orders to schedule pump-out by local septic service will be performed.
Enclosed Loading Docks	Prevent precipitation from coming in contact with any material being loaded or unloaded.
Containment Systems	Used to contain leaks or spills. Examples include bulk chemical tanks and totes, as well as the used oil storage tank.

Appendix B: Site Map



- Storm Drains
- Man Ways
- Sewer - City
- Port Drains



Appendix C: Materials Inventory

MATERIALS INVENTORY

Oils and Lubricants

- Used Oil
- Chevron ISO 460 FM
- Chevron ISO 220 FM
- Chevron ISO 68 FM
- Delo 400, 15W-40 Motor Oil
- Transformer Oil (contained with transformers owned and maintained by Pacific Power Utility District)

Chemicals

- Sodium hydroxide, 50%
- Sodium Hypochlorite - Chlorine
- Nitric / phosphoric acid
- Anhydrous ammonia (refrigerant)

Processing Aids

- Perlite
- Enzymes

Finished Product: This facility maintains several bulk storage rooms for work in process as well as finished product. Total storage capacity is approximately one million gallons. Product in these tanks may include juices, purees, distillates, and essences.

Appendix D: Spill Notification Contact List

SPILL NOTIFICATION CONTACT LIST

		Work	Cell
Facility Management:	Michael Sorenson	509-786-2611 ext. 1232	509-830-2611
Response Team:	Charlie Meyers	509-515-0685	509-788-8390
	Jay Fanciullo	509-515-0687	509-788-8497
	Bruce DeJong	509-786-2611 ext. 1260	509-947-5779
	David Luther	509-786-2611 ext. 1222	509-832-8499
Fire Department:		911 or 509-837-3999	
Police:		911 or 509-837-2120	
National Response Center:		1-800-424-8802	
Washington Department of Ecology:		1-509-575-2490	
Washington EPA:		1-206-553-1263	
Fuel Source:	Valley Wide Energy		
M-Sa, 5:00 a.m.-9:00 p.m.	509-882-3764		
Sunday 8:00 a.m – 4:00 p.m.			
Propane:	Pacific Propane	1-509-854-4133	
Oil / Lubricants:	Christensen	1-509-830-3708	