

A. General Information

Facility Name and Address: Wild Flavors – AM Todd

1501 S Columbus Ave

Goldendale, WA 98620

Permit Number: ST0501326

Permit Type: Industrial State Waste Discharge Permit to POTW/Private (Individual)

Permit Effective Dates: November 17, 2019, to November 16, 2024 (Temporary Permit)

Inspection Date and Time: October 16, 2024, 11:25 AM to 1:13 PM

Discharge to: Goldendale Publicly Owned Treatment Works (POTW)

Type of Inspection: Announced

Compliance Inspection - Without Sampling

Photographs Taken: ☒ Yes ☐ No

Samples Taken: ☐ Yes ☒ No

B. Personnel Information

Ecology Representative(s): Stephanie Giesin- Permit Developer/Permit Manager (Lead Inspector)

Nikki Gassman – Permit Developer/Facility Manager

Maricela Mora – Water Quality Office Assistant

Facility Representative(s): David Bischoff, Site Operations Supervisor

Email: David.bischoff@adm.com Phone: (509) 773-4008

Rich Stephens, Regional Environmental Director

Email: rich.stephens@adm.com Phone: (319) 398-0375

Amanda Richards, Lab Technician

Email: N/A Phone: N/A

Responsible Party/Official: Richard Nichols, Production Manager

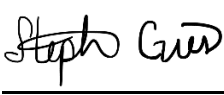
PO Box 310

Goldendale, WA 98620

Email: Richard.nichols@adm.west Phone: (269) 254-3150

Inspector Signature

Reviewer Signature



10/18/2024

Andrea Jedel (Electronic Signature) 10/25/2024

Stephanie Giesin

Date

Andrea Jedel

Date

Permit Developer/Permit Manager

Industrial Unit Supervisor

C. Facility Description and Background

The purpose of this inspection was a routine compliance inspection of the facility and to meet the permittees as this was my (Stephanie Giesin) first inspection of the facility since I became their permit developer/manager earlier this year. The facility has a temporary permit and submits discharge monitoring reports (DMRs). The temporary permit constitutes the discharges indicated on their application. The first inspection of this facility was on April 24, 2019, in response to an upset at the Goldendale POTW when 5 gallons of mint oil was discharged instead of the wastewater. Time of discharging the wastewater was coordinated with the City of Goldendale, so they were aware when the facility was discharging, and amount of water being discharged. The facility submitted a renewal application on November 16, 2023. Their application was reviewed and deemed to be incomplete. Ecology sent an Incomplete Application letter on March 25, 2024, with noted deficiencies. An updated application was received on April 30, 2024, and the renewal application was accepted as complete on June 4, 2024.

D. Inspection Narrative and Observations

We arrived at the facility at 11:25 am and Rich and David let us into the facility. We did brief introductions of Ecology staff. I filled out the sign in sheet and Rick showed us into their conference room. Rich said he needed to call someone from Ecology to verify my employment with the Agency, as this is their company policy. I gave Rich and David my business card and we provided him with Andea Jedel's phone number, our Industrial Unit Supervisor. I told Rich she might be busy in a meeting and may not be able to answer. His call to her went to voicemail, so we gave him Ecology's reception line. He talked to our receptionist, and she verified my employment with Ecology.

Rich had David explain the facility process of receiving the mint oil that comes from farmers. They harvest and distill the mint oil. They use a steam process to take off the mint. The mint is run through sampling for pesticides, and they sample for pH and Biological Oxygen Demand (BOD) for their permit. The waste oil that comes off the top is collected and shipped to Kalamazoo for disposal.

I explained that they have a temporary permit that is based on the discharges and information they indicated on their application, and they submit DMRs. I said permit cycles are five years, so their permit will expire in November 2024. However, since they have a temporary permit, they technically do not expire. It is Ecology's job to write their permit which would describe their limits or monitoring required and the facility's Fact Sheet, which explains the history of the facility and how we determined their permit limits. They would continue to follow their temporary permit until Ecology writes them a permit.

1. Site Walkthrough

Prior to the tour of the facility, I asked if I could take photos for the inspection report. Rick said that I could take photos, but to ask before taking photos. I told Rich I would not take any photos with proprietary information, and I would only want to take photos regarding management of their wastewater and the process of discharge. David walked us into their warehouse with mint drums and explained to us how they rinse out the drums and separate the mint oil from the wastewater. He explained they have a lab on site that does their sampling. I asked where they send their samples for testing, and he said we could talk to their lab technician Amanda to verify that.

Rich took us out back of the facility to the storage area where they keep their wastewater from rinsing the mint drums. The wastewater is kept in an open tote where most of the water evaporates, and they would discharge water from the totes to the Goldendale POTW on a set schedule.

Rich took us back into the warehouse and I asked where the floor drains discharge to. David said they have a sump just outside the loading dock of the warehouse where they pump their stormwater. The sump must be turned on to discharge the water, so if they had a spill inside the facility, they could contain the spill before it was discharged to the sump. The sump discharges to a stormwater ditch alongside the facility. They also have a stormwater pond northwest of their fenced outside storage area, that captures stormwater runoff from the storage area. A stormwater ditch is alongside of the storage area to the west to channel stormwater into the pond. There is a control valve from the pipe on the stormwater pond.

Rich and David said they have not discharged any wastewater to the City of Goldendale since April 2023. Around that time there had been a change in administration and the Goldendale POTW said they would no longer wastewater from the facility. Since April they have kept the wastewater in the open totes for the water to evaporate. Based on their production this last year and having a warm summer they only have a few totes

from their wastewater. I told them that I would see who Goldendale's permit manager is and have a discussion with someone from the municipal unit about the change in administration and their discharges moving forward. I said that their permit allows them to discharge to the POTW and I said if the city would not accept their wastewater there are other options the facility could consider with managing and discharging their wastewater. I briefly mentioned installation of a double lined lagoon with leak detection.

David and Rich took us back inside to show us the discharge point to the POTW. The facility has a log sheet for their discharges that indicates the amount of wastewater discharged, BOD, and documentation the city was contacted about the discharge. The last documented discharge was from April 20, 2023. There is a cover and lock over the discharge location in the warehouse. The cover and lock ensure that there are no unauthorized discharges to the POTW.

We walked back onto the floor of the warehouse where we met Amanda their lab technician. She explained what they test for in the lab and I asked where they send their lab samples to. Amanda said they sent their BOD testing to Eurofins. They are looking for a lab to do their pesticide testing. I told Amanda we have a [Lab Search](#) website where you can look for labs in the area and what they are accredited to sample for.

We went back into the conference room to finish our discussion. I went over the option of a double lined lagoon with leak detection for discharging their wastewater. The option for using a double lined lagoon with leak detection would relieve the permittee from the requirement to have an industrial wastewater discharge permit. If the facility was interested in this option it would be an upfront cost for engineering for the construction of the lagoon that Ecology would have to review and approve prior to construction according to the Washington Administrative Code(WAC) [WAC 173-240-110](#) for submission of plans and reports and [WAC 173-240-130](#) for engineering reports. I also said I could talk with our hydrogeologist if there were option for land application of their wastewater. Rich said he would like to follow up with the Goldendale POTW first and I said we could schedule time after to discuss anything further with the facility and City of Goldendale if necessary.

I also went over the permit writing process and gave them a timeline of what that might look like. Our permits go through our internal peer review process, then to facility review where the facility reviews the permit and fact sheet and provides comments, then to public review where the public have a chance to provide comments, and then permit issuance. At each stage if comments were received Ecology would need to address them, so the shortest timeline is 6 months. I also said depending on how the facility would like to proceed with managing their wastewater, we may not need to write them a permit and might have the option to terminate their temporary permit. I will discuss the facility with my supervisor, the municipal unit, and our hydrogeologist and we will follow up with the facility on their permit moving forward.

If you have any questions or concerns regarding this inspection report, please contact Stephanie Giesin at stephanie.giesin@ecy.wa.gov or (509) 504-0172.

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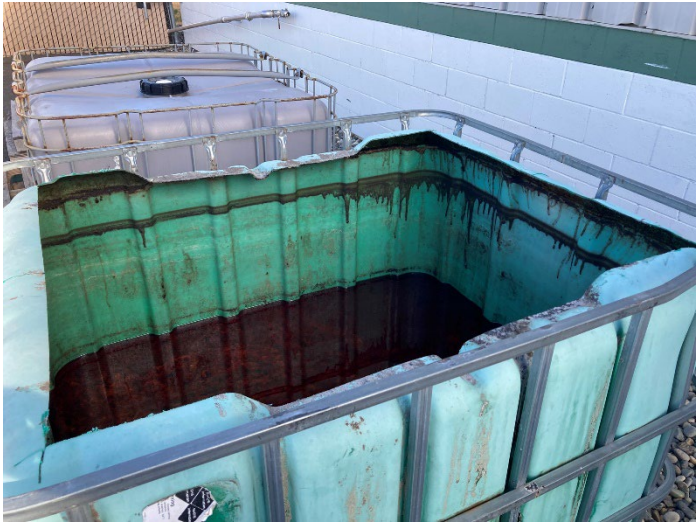


Photo 1 [IMG_0537]
Description: Wastewater in an open tote in storage area outside facility- water evaporates and not currently being discharged to Goldendale POTW



Photo 2 [IMG_0538]
Description: Stormwater sump – all floor drains from inside the warehouse go here



Photo 3 [IMG_0539]
Description: Stormwater ditch where sump is discharged when valve is turned on



Photo 4 [IMG_0540]
Description: Stormwater pond on the northwest corner of the property that collects stormwater from outside storage area

