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**Archer Daniels Midland Company
Goldendale, Washington**

Spill Prevention Control and Countermeasures Plan

(SPCC)

For

ADM WILD FLAVORS AND SPECIALTY INGREDIENTS (WFSI)

AM TODD WEST

at

**Archer Daniels Midland Company
Goldendale, Washington**



Wild Flavors & Specialty Ingredients SPCC Plan			
Date Issued 8/20/2021	Document # NA	Version 4	Page ii of ix

ADM MANAGEMENT APPROVAL

This Spill Prevention, Control, and Countermeasure Plan (SPCC Plan) has been prepared in accordance with good engineering practices and has the full approval of management at a level of authority necessary to commit all necessary manpower, equipment, and materials to fully implement the provisions described herein [112.7a].

David Bischoff

Name of Facility Representative

David Bischoff

Signature of Facility Representative

Facility Lead Person

Title

10/19/21

Date



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued 8/20/2021	Document # NA	Version 4	Page iii of ix
--------------------------	------------------	--------------	-------------------

PROFESSIONAL ENGINEER'S CERTIFICATION

Professional Engineer Certification [§112.3(d) and §112.7(d)]

In accordance with §112.3(d) and §112.7(d), a Registered Professional Engineer will review, evaluate and certify this SPCC Plan and any technical amendment to this SPCC Plan within six months after a change in the facility design, construction, operation, or maintenance occurs which materially affects the facility's potential for the discharge of oil onto or upon the navigable waters of the United States.

Certification:

"I hereby certify in accordance with §112.3(d) that: (1) I am familiar with the requirements of §112; (2) my agents and/or I have visited and examined the facility; (3) that the plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of Part 112; (4) that procedures for required inspections and testing have been established; and (5) that the plan is adequate for this facility."

Matthew Nicholas Henry

Name of Licensed Professional Engineer

Signature of Licensed Professional Engineer

Registration Number: 20104936

State: Washington Date: 8/20/2021

Seal:





Wild Flavors & Specialty Ingredients SPCC Plan			
Date Issued 8/20/2021	Document # NA	Version 4	Page iv of ix

TABLE OF CONTENTS

ADM MANAGEMENT APPROVAL.....	li
PROFESSIONAL ENGINEER'S CERTIFICATION	iii
SPCC REQUIREMENT GUIDE	vii
I. GENERAL APPLICABILITY.....	1
II. DEFINITIONS	1
III. REQUIREMENT TO PREPARE AND IMPLEMENT A SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN	2
IV. AMENDMENT OF SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN BY REGIONAL ADMINISTRATOR	2
V. AMENDMENT OF SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN BY OWNER OR OPERATOR.....	3
A. SPCC PLAN REVIEW.....	4
VI. QUALIFIED FACILITY PLAN REQUIREMENTS.....	5
VII. GENERAL REQUIREMENTS FOR SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLANS	5
A. GENERAL INFORMATION REQUIRED FOR SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLANS	5
1. FACILITY IDENTIFICATION	5
a. Oil Storage.....	7
b. Discharge Prevention Measures.....	9
c. Discharge or Drainage Controls.....	9
d. Countermeasures for Discharge Discovery, Response, and Cleanup.....	9
e. Disposal of Recovered Material.....	12
f. Call List.....	12
2. DISCHARGE REPORTING INFORMATION	13
3. EMERGENCY RESPONSE GUIDE.....	14
B. POTENTIAL RELEASE SCENARIOS.....	14
C. CONTAINMENT AND/OR DIVERSIONARY STRUCTURES	14
1. OFFSHORE FACILITIES	14
2. ONSHORE FACILITIES	14
D. CONTAINMENT AND/OR DIVERSIONARY STRUCTURES EXCEPTIONS	15
1. OIL SPILL CONTINGENCY PLAN	15
2. WRITTEN COMMITMENT.....	15
E. INSPECTIONS, TESTS, AND RECORDS	15
F. PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES	15
1. PERSONNEL TRAINING	15
2. RESPONSIBLE PLANT INDIVIDUAL FOR SPILL PREVENTION AND TRAINING.....	15
G. SECURITY	16



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued	Document #	Version	Page
8/20/2021	NA	4	v of ix

H. LOADING, TRANSFERRING, OR UNLOADING OPERATIONS	16
1. SECONDARY CONTAINMENT FOR TANK TRUCKS AND RAILCARS.....	16
2. WARNING OR BARRIER SYSTEM FOR VEHICLES	16
3. VEHICLES LOWERMOST DRAINAGE OUTLET EXAMINED BEFORE LEAVING.....	16
I. BRITTLE FRACTURE EVALUATION	16
J. STATE RULES AND REGULATIONS	17
K. QUALIFIED OIL-FILLED OPERATIONAL EQUIPMENT	17
1. QUALIFICATION CRITERIA-REPORTABLE DISCHARGE HISTORY	17
2. ALTERNATIVE REQUIREMENTS TO GENERAL SECONDARY CONTAINMENT.....	17
VIII. SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN REQUIREMENTS FOR ONSHORE FACILITIES (EXCLUDING PRODUCTION FACILITIES).....	17
A. SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN COMPLIANCE)	17
B. FACILITY DRAINAGE AND CONTAINMENT CONTROL.....	17
C. BULK STORAGE CONTAINERS.....	18
1. TANK COMPATIBILITY WITH ITS CONTENTS	18
2. CONTAINMENT VOLUME AND CONSTRUCTION FOR BULK STORAGE CONTAINERS	18
3. CORROSION PROTECTION FOR UNDERGROUND STORAGE TANKS	19
4. CORROSION PROTECTION FOR PARTIALLY BURIED AND BUNKERED STORAGE TANKS	19
5. INTEGRITY TESTING AND INSPECTION OF ABOVEGROUND STORAGE CONTAINERS	19
6. INTERNAL HEATING COILS	19
7. FAIL-SAFE ENGINEERED EQUIPMENT FOR BULK STORAGE TANKS	19
8. EFFLUENT OBSERVATION	20
9. VISIBLE OIL LEAKS	20
10. POSITIONING OF MOBILE/PORTABLE STORAGE TANKS	20
D. FACILITY TRANSFER OPERATIONS, PUMPING, AND FACILITY PROCESS.....	20
1. BURIED PIPING INSTALLATION PROTECTION.....	20
2. NOT-IN-SERVICE AND STANDBY PIPING.....	20
3. PIPE SUPPORT DESIGN	21
4. INSPECTION AND INTEGRITY TESTING OF PIPELINES	21
5. ABOVEGROUND PIPING PROTECTION FROM VEHICULAR TRAFFIC.....	21
IX. SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN REQUIREMENTS FOR ONSHORE OIL PRODUCTION FACILITIES	21
X. SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN REQUIREMENTS FOR ONSHORE OIL DRILLING AND WORKOVER FACILITIES	21
XI. SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN REQUIREMENTS FOR OFFSHORE OIL DRILLING AND WORKOVER FACILITIES	21
APPENDIX A. FACILITY DRAWING	
APPENDIX B. SEMI-ANNUAL FACILITY INSPECTION CHECKLIST	
APPENDIX C. STORM WATER INSPECTION FORM	



Wild Flavors & Specialty Ingredients SPCC Plan			
Date Issued 8/20/2021	Document # NA	Version 4	Page vi of ix

APPENDIX D. CONTAINMENT CALCULATIONS

APPENDIX E. OIL SPILL CONTINGENCY PLAN

APPENDIX F. CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA

APPENDIX G. EMERGENCY RESPONSE GUIDE

APPENDIX H. SPILL REPORT FORM

APPENDIX I. IMPLEMENTATION SCHEDULE

APPENDIX J. INTEGRITY TESTING



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued	Document #	Version	Page
8/20/2021	NA	4	vii of ix

SPCC REQUIREMENT GUIDE

[112 Part A]	1
[112.1] – General Applicability	1
[112.2] – Definitions	1
[112.3] – Requirement to Prepare and Implement a Spill Prevention, Control, and Countermeasure Plan	2
[112.4] – Amendment Of Spill Prevention, Control, And Countermeasure Plan By Regional Administrator	2
[112.5] – Amendment Of Spill Prevention, Control, And Countermeasure Plan By Owner or Operator	3
[112.6] – Qualified Facility Plan Requirements	5
[112.7] – General Requirements for Spill Prevention, Control, and Countermeasure Plans	5
[112.7(d)] – Containment and/or Diversionary Structures Exceptions	15
[112.7(d)(1)] – Oil Spill Contingency Plan	15
[112.7(d)(2)] – Written Commitment	15
[112.7(e)] – Inspections, Tests and Records	15
[112.7(g)] - Security	16
[112.7(h)] - Facility Loading/Unloading Operations	16
[112.7(h)(1)] - Secondary Containment	16
[112.7(h)(2)] - Warning or Barrier System	16
[112.7(h)(3)] - Valve Inspection	16
[112.7(i)] – Brittle Fracture Evaluation	16
[112.7(j)] – State Rules and Regulations	17
[112.7(k)] - Qualified Oil-Filled Operational Equipment	17
[112.7(k)(1)] - Qualification Criteria-Reportable Discharge History	17
[112.7(k)(2)] - Alternative Requirements to General Secondary Containment ..	17
[112.7(a)] - General Information Required for Spill Prevention, Control, And Countermeasure Plans	5
[112.7(a)(1-2)] – General Information	5
[112.7(a)(3)] – Facility Identification	5
[112.7(a)(3)(i)] – Oil Storage	7
[112.7(a)(3)(ii)] – Discharge Prevention Measures	9
[112.7(a)(3)(iii)] – Discharge or Drainage Controls	9
[112.7(a)(3)(iv)] – Countermeasures for Discharge Discovery, Response, and Cleanup	9
[112.7(a)(3)(v)] – Disposal of Recovered Material	12
[112.7(a)(3)(vi)] – Call List	13
[112.7(a)(4)] – Discharge Reporting Information	13
[112.7(a)(5)] – Emergency Response Guide	14



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued	Document #	Version	Page
8/20/2021	NA	4	viii of ix

[112.7(b)] – Potential Release Scenarios.....	14
[112.7(c)] - Containment Structures.....	14
[112.7(c)(1)] – Onshore Facilities	14
[112.7(c)(2)] – Offshore Facilities	14
[112.7(f)] - Personnel Training.....	15
[112.7(f)(1) and (3)] - Oil Spill Prevention Training	15
[112.7(f)(2)] - Designated Person.....	15
[112 Part B].....	17
[112.10] - Spill Prevention, Control, And Countermeasure Plan Requirements For Onshore Oil Drilling and Workover Facilities.....	21
[112.11] - Spill Prevention, Control, And Countermeasure Plan Requirements For Offshore Oil Drilling and Workover Facilities	21
[112.8] - Spill Prevention, Control, And Countermeasure Plan Requirements For Onshore Facilities (Excluding Production Facilities).....	17
[112.8(a)] – Spill Prevention, Control, and Countermeasure Plan Compliance	17
[112.8(b)] – Facility Drainage.....	17
[112.8(b)(1)] – Locking of Drain Valves.....	17
[112.8(b)(2)] – Description of Drain Valves.....	17
[112.8(b)(3)] – Drainage System for Undiked Areas	18
[112.8(b)(4)] – Diversionary System for Undiked Areas without Drainage Systems	18
[112.8(b)(5)] – Redundant Pumps for Treatment Unit.....	18
[112.8(c)] - Bulk Storage Containers.....	18
[112.8(c)(1)] - Tank Compatibility	18
[112.8(c)(10)] – Visible Oil Leaks	20
[112.8(c)(11)] – Positioning of Mobile/Portable Storage Tanks	20
[112.8(c)(2)] – Secondary Containment	18
[112.8(c)(3)(i-iv)] – Containment Drainage Control	17
[112.8(c)(4)] - Corrosion Protection for Underground Storage Tanks	19
[112.8(c)(5)] - Corrosion Protection for Partial Buried and Bunkered Storage Tanks.....	19
[112.8(c)(6)] – Integrity Testing and Inspection of Aboveground Storage Containers	19
[112.8(c)(7)] - Internal Heating Coils	19
[112.8(c)(8)] - Fail-safe Engineer Equipment.....	19
[112.8(c)(9)] – Effluent Observation	20
[112.8(d)] - Facility Transfer Operations, Pumping, And Facility Process	20
[112.8(d)(1)] - Buried Piping Installation Protection	20
[112.8(d)(2)] - Not-in-Service or Standby Pipelines	20
[112.8(d)(3)] - Pipe Support Design.....	21
[112.8(d)(4)] - Inspection and Integrity Testing of Pipelines	21



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued	Document #	Version	Page
8/20/2021	NA	4	ix of ix

[112.8(d)(5)] – Aboveground Piping Protection from Vehicular Traffic	21
[112.9] - Spill Prevention, Control, And Countermeasure Plan Requirements For Onshore Oil Production Facilities	21
[112 Part C].....	17
[112.12] - Spill Prevention, Control, And Countermeasure Plan Requirements For Onshore Facilities (Excluding Production Facilities).....	17
[112.12(a)] – Spill Prevention, Control, and Countermeasure Plan Compliance	17
[112.12(b)] – Facility Drainage.....	17
[112.12(b)(1)] – Locking of Drain Valves.....	17
[112.12(b)(2)] – Description of Drain Valves.....	17
[112.12(b)(3)] – Drainage System for Undiked Areas	18
[112.12(b)(4)] – Diversionary System for Undiked Areas without Drainage Systems	18
[112.12(b)(5)] – Redundant Pumps for Treatment Unit.....	18
[112.12(c)] - Bulk Storage Containers.....	18
[112.12(c)(1)] - Tank Compatibility	18
[112.12(c)(10)] – Visible Oil Leaks	20
[112.12(c)(11)] – Positioning of Mobile/Portable Storage Tanks	20
[112.12(c)(2)] – Secondary Containment	18
[112.12(c)(3)(i-iv)] – Containment Drainage Control	18
[112.12(c)(4)] - Corrosion Protection for Underground Storage Tanks.....	19
[112.12(c)(5)] - Corrosion Protection for Partial Buried and Bunkered Storage Tanks.....	19
[112.12(c)(6)] – Integrity Testing and Inspection of Aboveground Storage Containers	19
[112.12(c)(7)] - Internal Heating Coils	19
[112.12(c)(8)] - Fail-safe Engineer Equipment.....	19
[112.12(c)(9)] – Effluent Observation	20
[112.12(d)] - Facility Transfer Operations, Pumping, And Facility Process	20
[112.12(d)(1)] - Buried Piping Installation Protection	20
[112.12(d)(2)] - Not-in-Service or Standby Pipelines	20
[112.12(d)(3)] - Pipe Support Design.....	20
[112.12(d)(4)] - Inspection and Integrity Testing of Pipelines	20
[112.12(d)(5)] – Aboveground Piping Protection from Vehicular Traffic	20



Wild Flavors & Specialty Ingredients SPCC Plan			
Date Issued 8/20/2021	Document # NA	Version 4	Page 1 of 26

PART A – APPLICABILITY, DEFINITIONS, AND GENERAL REQUIREMENTS FOR ALL FACILITIES AND ALL TYPES OF OILS

I. GENERAL APPLICABILITY [112.1]:

This Spill Prevention, Control, and Countermeasure (SPCC) Plan establishes procedures, methods, equipment, and other requirements to prevent the discharge of oil from this non-transportation-related onshore facility into or upon the navigable waters of the United States or adjoining shorelines [112.1(a)]. The SPCC Plan has been prepared because the facility is engaged in producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location, could reasonably be expected to discharge oil in quantities that may be harmful, as described in 40 CFR part 110, into or upon the navigable waters of the United States or adjoining shorelines and has oil in:

- (1) Any aboveground container;
- (2) Any completely buried tank not exempted;
- (3) Any container that is used for standby storage, for seasonal storage, or for temporary storage, or not otherwise “permanently closed”;
- (4) Any “bunkered tank” or “partially buried tank”, or any container in a vault, each of which has been defined as an aboveground storage container. [112.1(b)]

This facility is required to develop this Plan because:

- (1) The facility, equipment, or operation is subject to the jurisdiction of the Environmental Protection Agency (EPA) due to the fact that the facility location could reasonably be expected to have a discharge to navigable waters as described above. This determination was based solely upon consideration of the geographical and location aspects of the facility (such as proximity to navigable waters or adjoining shorelines, land contour, drainage, etc.) and did not consider manmade features such as dikes, equipment or other structures, which may serve to restrain, hinder, contain, or otherwise prevent a discharge [112.1(d)(1) and (d)(1)(i)].
- (2) And/or the facility meets one of the following requirements:
 - The completely buried storage capacity of the facility is 42,000 gallons or more of oil and is not currently subject to all of the technical requirements of 40 CFR Part 280 or all of the technical requirements of a State program approved under Part 281 of this chapter.
 - The aggregate aboveground storage capacity of the facility is 1,320 gallons or more of oil [112.1(d)(2) and (d)(2)(i-ii)].

II. DEFINITIONS [112.2]:

The definitions for this SPCC plan can be found in 40 CFR 112.2.



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued	Document #	Version	Page
8/20/2021	NA	4	2 of 26

III. REQUIREMENT TO PREPARE AND IMPLEMENT A SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN [112.3]:

The facility is subject to this section and has prepared this SPCC Plan in writing, and in accordance with 40 CFR 112.7, and any other applicable section of that part.

The facility maintains a complete copy of the Plan at the facility because it is normally attended for at least four hours per day. The Plan is available to the Regional Administrator for on-site review during normal working hours [112.3(e)(1-2)].

A qualified facility may self-certify its SPCC Plan, as provided in 40 CFR 112.6. A qualified facility is one that:

- (1) Has an aggregate aboveground storage capacity of 10,000 gallons or less; and
- (2) Has had no single discharge exceeding 1,000 U.S. gallons or no two discharges each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to this part if the facility has been in operation for less than three years [112.3(g)].

IV. AMENDMENT OF SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN BY REGIONAL ADMINISTRATOR [112.4]:

Whenever the facility has discharged more than 1,000 U.S. gallons of oil in a single discharge or discharged more than 42 U.S. gallons of oil in each of two discharges occurring within any twelve-month period, the facility will submit the following information to the Regional Administrator within 60 days:

- (1) Name of the facility;
- (2) Your name;
- (3) Location of the facility;
- (4) Maximum storage or handling capacity of the facility and normal daily throughput;
- (5) Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements;
- (6) An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
- (7) The cause of the discharge, including a failure analysis of the system or subsystem in which the failure occurred;
- (8) Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence; and
- (9) Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge. [112.4(a)]

The facility will also send to the appropriate State agency or agencies in charge of oil pollution control activities a complete copy of all information provided to the Regional Administrator. Upon receipt of the information such State agency or agencies may conduct a review of the Plan and make recommendations to the Regional Administrator as to changes that would prevent or contain future discharges. The Regional Administrator will



Wild Flavors & Specialty Ingredients SPCC Plan			
Date Issued 8/20/2021	Document # NA	Version 4	Page 3 of 26

notify the facility that the Plan does not meet the requirements as outlined in 40 CFR 112 or that amendment is necessary to prevent and contain discharges from the facility [112.4(c-d)].

V. AMENDMENT OF SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN BY OWNERS OR OPERATORS [112.5]:

The facility will amend the SPCC Plan in accordance with the general requirements found in 40 CFR 112.7 and 112.5 when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge. Examples of changes that may require amendment of the Plan include, but are not limited to: commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacement, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes of product or service; or revision of standard operation or maintenance procedures at a facility. The changes will be prepared within six months, and implemented as soon as possible, but not later than six months following the amendment of this Plan [112.5(a)].

In addition, the facility will complete a review and evaluation of this SPCC Plan at least once every five years. As a result of this review and evaluation, the Plan will be amended within six months to include more effective prevention and control technology if the technology has been field-proven at the time of the review and will significantly reduce the likelihood of a discharge from the facility. The amendment(s) will be implemented as soon as possible, but not later than six months following the amendment of the Plan. The facility will document the review and evaluation, and will indicate whether the Plan was amended in the log below [112.5(b)]:



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page
4 of 26

A. SPCC Plan Review:

I have completed the review and evaluation of the SPCC Plan for ADM Wild Flavors and Specialty Ingredients:

	Date	Type of Amendment	Signature of SPCC Program Manager
Initial Date of SPCC Plan	July 2, 2014	<input checked="" type="checkbox"/> Technical <input checked="" type="checkbox"/> Administrative <input type="checkbox"/> None	<i>Lloyd Mangun</i>
First Review	August 19, 2016	<input checked="" type="checkbox"/> Technical <input checked="" type="checkbox"/> Administrative <input type="checkbox"/> None	
Second Review	July 5, 2019	<input type="checkbox"/> Technical <input checked="" type="checkbox"/> Administrative <input type="checkbox"/> None	
Third Review	August 20, 2019	<input checked="" type="checkbox"/> Technical <input checked="" type="checkbox"/> Administrative <input type="checkbox"/> None	
Fourth Review	August 20, 2021	<input type="checkbox"/> Technical <input checked="" type="checkbox"/> Administrative <input type="checkbox"/> None	
Fifth Review		<input type="checkbox"/> Technical <input type="checkbox"/> Administrative <input type="checkbox"/> None	
Sixth Review		<input type="checkbox"/> Technical <input type="checkbox"/> Administrative <input type="checkbox"/> None	
Seventh Review		<input type="checkbox"/> Technical <input type="checkbox"/> Administrative <input type="checkbox"/> None	
Eighth Review		<input type="checkbox"/> Technical <input type="checkbox"/> Administrative <input type="checkbox"/> None	
Ninth Review		<input type="checkbox"/> Technical <input type="checkbox"/> Administrative <input type="checkbox"/> None	

A Professional Engineer will certify any technical amendment to the Plan in accordance with the 'Professional Engineering Certification' criteria outlined on the front page of this Plan.



Wild Flavors & Specialty Ingredients SPCC Plan			
Date Issued 8/20/2021	Document # NA	Version 4	Page 5 of 26

VI. QUALIFIED FACILITY PLAN REQUIREMENTS [112.6] :

This facility's SPCC plan has been reviewed and certified by a Professional Engineer. This SPCC plan will not be self-certified.

VII. GENERAL REQUIREMENTS FOR SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLANS [112.7]:

A. General Information Required for Spill Prevention, Control, and Countermeasure Plans [112.7a]:

This plan has been prepared in accordance with good engineering practices and has the full approval of management (See front page) that can commit the necessary resources to fully implement the Plan. The index of this plan indicates where the Plan does not follow the sequence specified by the regulations. Any nonconformance with the requirements of the regulation will be discussed in the section where the nonconformance occurs [112.7(a)(1-2)] .

1. Facility Identification [112.7(a)(3)]:

Facility Owner, Address, and Telephone:

ARCHER DANIELS MIDLAND COMPANY
4666 Faries Parkway
Decatur, IL 62525
(217) 424-5200

Facility Operator, Address, and Telephone:

ARCHER DANIELS MIDLAND COMPANY
AM TODD WEST
1501 SOUTH COLUMBUS AVE
GOLDENDALE, WA, 98620
(877) 676-4008
(509) 773-4009

Facility's Longitude and Latitude:

Longitude (west): 45° 48.632' and Latitude (north): 120° 49.375'

Facility Contact(s):

Name	Title	Telephone Number
David Bischoff	Facility Lead Person	(509) 250-6239
Rich Stephens	Region 3 Area Env. Manager	(319) 310-0084

Description of Facility:

Operations at the facility include shipping and receiving, storing, processing and



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page
6 of 26

blending of mint oils. Processing consists of removing water and other impurities from mint oil received from suppliers and blending the oils to meet customer specifications. An onsite quality assurance lab tests incoming and processed materials. Processing and blending occurs in tanks that serve as process vessels. Raw mint oil is received in 55-gallon drums and 275-gallon totes. Finished product is also stored in drums and totes. The majority of storage is inside the warehouse though totes of mint oil may be stored outside. Outside storage typically occurs during the mint harvest season and in the months immediately following harvest. The facility began operation in 1995 and became an ADM facility in 2014.

Appendix A contains a copy of the facility layout. The drawing shows the location of the storage containers and contents listed below in Part VII.A.1.a "Oil Storage", the location of the spill response equipment listed in Part VII.A.1.d, and the surface drainage of the facility.

Site Drainage

The flat topography on which the plant is located greatly reduces the potential for surface water and/or releases to flow off-site to impact surface water. Generally surface water flow direction is to the northwest toward the onsite stormwater retention basin. Ditches along the west and north boundaries of the site direct all runoff and any potential spills into the basin.



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page
7 of 26

a. Oil Storage [112.7(a)(3)(i)] (Table 1):

Source- Storage Container ID/Location	Contents	Level Indication (Legend 1)	Level Alarm (Legend 2)	Potential Release Scenarios					
				Capacity/Potential Loss Volume (gal)	Type of Equipment Failure (Legend 3)	Direction of Flow	Spill Rate (gal/hr)	Containment Volume (gal)	
Aboveground Storage Tanks									
Tank A	Mint Oil	N	HLA/NC	1,733	L, R, P	N	1,733	58,348	
Tank B	Mint Oil	N	HLA/NC	1,733	L, R, P	N	1,733	58,348	
Tank C	Mint Oil	N	HLA/NC	1,733	L, R, P	N	1,733	58,348	
Tank D	Mint Oil	N	HLA/NC	1,733	L, R, P	N	1,733	58,348	
Tank E	Mint Oil	N	N	6,933	L, R, P	N	6,933	58,348	
Oil-Fill Manufacturing Equipment (Process Vessels)									
Separator Vessel	Mint Oil	N	HLA/NC	100	L, R, P	N	100	58,348	
Mixing Vessel	Mint Oil	N	HLA/NC	137	L, R, P	N	137	58,348	
Partially Buried, Bunkered or Underground Storage Tanks (not subject to 40 CFR Part 280 and 281)									
No Partially Buried, Bunkered or Underground Storage Tanks (not subject to 40 CFR Part 280 and 281)									
Drums/Portable Containers (55 gallons or greater)									
Totes – inside storage (up to 978)	Mint Oil	N/A	N/A	275 each	L, TOS, P	N	275	58,348	
Drums – inside storage (up to 3,912)	Mint Oil	N/A	N/A	55 each	L, TOS, P	N	55	58,348	
Totes – outside storage (up to 1,000)	Mint Oil	N/A	N/A	275 each	L, TOS, P	NW	275	67,654	
Loading and Unloading Operations									
With Loading/Unloading Racks									
No Loading/Unloading Racks In Use Onsite									
Without Loading/Unloading Racks									
Drum unloading from delivery truck	Mint Oil	N/A	N/A	55	L, TOS, P	N	55	58,348	
Oil-Fill Operational Equipment (Transformers, Gearboxes, Hydraulic Systems) (55 gallons or greater) Not applicable									
Aboveground Pipeline									
Aboveground Pipelines	Mint Oil	N/A	N/A	Varies	P/VF		Varies	58,348	

Note: All hard copies of this document are uncontrolled and may not be the most recent version.



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page
8 of 26

Legend 1 for 'Level Indication'		Legend 2 for 'Level Alarm'		Legend 3 for 'Types of Equipment Failure'	
F	Float	FS	Float Switch	HB	Hose Burst
LI	Level Indicator	HHLA/NC	High-High Level Alarm -- No Cutoff	L	Leakage
LIS	Level Indicator Switch	HLA/NC	High Level Alarm -- No Cutoff	NA	Not Applicable
M	Manual Measurement	HHLA/WC	High-High Level Alarm W/ Cutoff	O	Overfill
NA	Not Applicable	HLA/WC	High Level Alarm W/ Cutoff	P/VF	Piping/Valve Failure
N	None	LC	Load Cell(s)	R	Rupture
SG	Sight Glass	NA	Not Applicable	TOS	Transfer Operations Spills
U	Ultrasonic	N	None	P	Puncture
DT	Drop Tube Gauge	FT	Flow Transmitter		
O	Other (Explain)	FTO	Flow Totalizer		
		O	Other		

*Assumes most likely oil spill scenario involving a hose failure. Should the transfer hose fail, the rate of loss would be approximately 150 gpm with a response time of about 30 seconds.



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page
9 of 26

b. Discharge Prevention Measures [112.7(a)(3)(ii)]:

Discharge prevention measures including procedures for routine handling of products (loading, unloading, and facility transfers, etc.) are as follows:

1. Prior to any transfer of oil, the available capacity of the receiving vessel will be verified.
2. The truck driver shall remain with his vehicle at all times while loading/unloading.
3. All unloading and loading hose connections and hoses will be checked prior to use. Defects, if found, will be corrected prior to use.
4. All unloading, transferring, and loading pumps, valves, valve settings and lines will be checked prior to operation. Defects, if found, will be corrected before commencing.
5. If any defects or leaks are observed during transfer, the transfer will be stopped and the defect corrected.
6. Drums and totes covered by this plan will be inspected for damage when received. Any damaged container will be immediately returned. Response materials will be available to contain any spill during movement or handling at the facility.

c. Discharge or Drainage Controls [112.7(a) (3) (iii)]:

Spill containment trenches are located inside the building at each of the warehouse entrances and are tied into the loading dock trench located outdoors on the north side of the building. The outdoor loading dock trench also receives storm water runoff from the paved approach to the loading dock. The loading dock trench system serves as secondary containment for the building and the loading dock area. The loading dock trench is outfitted with a pump to remove storm water accumulation by pumping it to the ditch on Industrial Park Way (north of the facility). The pump is manually operated. Any storm water that may accumulate within the containment area will be drained only after a thorough inspection of the water to ensure the water is free from oil. The inspection and subsequent discharge of any storm water will be recorded. Appendix C contains a copy of the inspection log. This record will be subject to the record retention policy discussed in Part VII.E of this plan.

d. Countermeasures for Discharge Discovery, Response, and Cleanup [112.7(a)(3)(iv)]:

In the Event of a Spill:

In the event of a small, incidental release 25 gallons or less, the following steps will be taken:

1. Upon detection of a release, the discovering employee will assess the spill and determine if he or she is able to contain the spill safely. If so, the discovering employee will use a shovels and/or onsite earth moving equipment to construct a berm around the affected area and/or deploy sorbents to contain the spilled product(s).



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page
10 of 26

2. The discovering employee will contact supervisory personnel and other available trained personnel to shut down operations, if required, and initiate further containment and cleanup activities. Put on necessary protective equipment (i.e., goggles, rubber gloves, etc.) and clean up the spill. Use appropriate safety-designed equipment, pumps, and hoses to pump oil product into tankers or any other appropriately sized container.
3. Supervisory personnel will call all appropriate plant management and environmental department contacts. Utilize the Plant Call List below (as appropriate).
4. Call in contracted help, if necessary. Ensure they bring appropriate equipment to aid in the response and/or cleanup of the spill.
5. Containerize, label, and dispose of contaminated soil and other materials such as sorbents, PPE, etc. Solid and/or hazardous waste contractors and disposal facilities will be contacted to determine an appropriate disposal destination for the oil containing materials. The shift superintendent and environmental department personnel will ensure waste is properly stored and disposed of, and disposal documentation is retained.
6. The shift superintendent and environmental department personnel will ensure the emergency equipment is decontaminated and returned to locations listed in this plan. Consumable materials such as sorbents and PPE used during spill response will be replaced, as necessary.
7. The supervisory personnel or their designee(s) will check for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, tanks, or other equipment before operations resume.

In the event of a spill greater than 25 gallons, the following steps will be taken:

1. Upon detection of a release, the discovering employee will assess the spill and determine if he or she is able to contain the spill safely. If so, the discovering employee will use a shovels and/or onsite earth moving equipment to construct a berm around the affected area and/or deploy sorbents to contain the spilled product(s).
2. The discovering employee will contact supervisory personnel and other available trained personnel to shut down operations, assess potential threats to human health and the environment, and if possible, initiate containment and cleanup activities. If necessary, supervisory staff may decide to evacuate the affected area, in which case notification will occur through radio receivers and telephones.
3. Put on necessary protective equipment (i.e., goggles, rubber gloves, etc.) and



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page
11 of 26

initiate containment and cleanup, if possible. Use appropriate safety-designed equipment, pumps, and hoses to pump oil product into tankers or any other appropriately sized container. Use a front-end loader to create soil berms/swales to halt the movement of the spill and deploy other spill response materials, as necessary.

4. Supervisory personnel will call plant management, environmental department contacts, and emergency responders (911), if appropriate. Utilize the Plant Call List below (as appropriate).
5. Call in contracted help, if necessary. Ensure they bring appropriate equipment to aid in the response and/or cleanup of the spill.
6. Supervisory, environmental department, and plant management personnel will notify the local authorities, appropriate regulatory agencies, and National Response Center, if required. Phone numbers are located in Appendix A.
7. Containerize, label, and dispose of contaminated soil and other materials such as sorbents, PPE, etc. Solid and/or hazardous waste contractors and disposal facilities will be contacted to determine an appropriate disposal destination for the oil containing materials. The shift superintendent and environmental department personnel will ensure waste is properly stored and disposed of, and disposal documentation is retained.
8. The shift superintendent and environmental department personnel will ensure the emergency equipment is decontaminated and returned to locations listed in this plan. Consumable materials such as sorbents and PPE used during spill response will be replaced, as necessary.
9. The supervisory personnel or their designee(s) will check for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, tanks, or other equipment before operations resume.
10. Environmental department and plant management personnel will complete and submit the proper spill forms and reports required by state and federal agencies.



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page
12 of 26

Equipment Immediately Available On-Site To Respond To A Spill:

TABLE 2

Equipment	Quantity	Storage Location
Pumps – Positive Displacement; air diaphragm	4	In production area
Shovels	5	1 inside, balance in shed
Hoses	Suction & discharge each pump	Attached to pumps
Absorbent Material	100 pads. 24 qtrs. floor dry	Cabinet and shed.
Absorbent Material	100 pads. 1 pillow	Spill kit drum
Drums	1	Spill Kit drum
Personal Protective Equipment	1 Respirator; lots of gloves & safety glasses	Cabinets
Personal Protective Equipment	2 goggles & 2 pair of gloves	Spill kit drum
Booms	40 – 42"	Rack A 9
Booms	12 – 3"X48"	Spill kit drum
Brooms and squeegees	5	Wall rack
Pumps – Positive Displacement; air diaphragm	4	In production area

e. Disposal of Recovered Material Planning [112.7(a)(3)(v)]:

All impacted materials recovered during spill response activities will be disposed of in accordance with local, state, and/or federal regulations, laws, and/or ordinances.

Permits may be required to transport and dispose of recovered and contaminated materials or equipment. Generally, waste characterization will be required prior to determining where the recovered material can be properly disposed. Environmental department and plant management personnel will be responsible for ensuring that all proper permits are received prior to transport or disposal of the recovered materials. Manifests, bills of lading, and other pertinent disposal documentation will be retained onsite.

f. Call List [112.7(a)(3)(vi)]:

If a spilled oil threatens to discharge into navigable water in a quantity which would violate applicable water quality standards or cause a film, sheen, or discoloration of the surface of the water or adjoining shorelines or causes a sludge or emulsion to be deposited beneath the surface of the water or upon the adjoining shorelines, call the following numbers in this order:



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page
13 of 26

Table 3

	Business Phone	Other Phone	Cellular Phone
<u>Plant Contacts</u>			
1 st - David Bischoff	(509) 773-4008		(509) 261 0025
2 nd - Will Bowdish	(509) 773-4008		(509) 261-0901
3 rd - Amanda Richards	(509) 773-4008		
<u>Corporate Contacts</u>			
Rich Stephens	(319) 398-0735		(319) 310-0084
Frank Cobbett			(905) 703-4097
<u>Regulatory Contacts</u>			
National Response Center	(800) 424-8802		
Washington Department of Ecology – Spill Hotline	(800) OILS-911	(800) 258-5990	
Washington Department of Ecology – Central Region	(509) 575-2490		
<u>Contractors (to be called in as needed)</u>			
National Response Corp – Pasco Office	(800) 899-4672	(509) 545-6110	

2. Discharge Reporting Information [112.7(a)(4)]:

At a minimum, the following information needs to be recorded during a discharge (See Appendix H for an example of a form which may be used):

- Exact address or location and phone number of the facility;
- The date and time of the discharge;
- The type of material discharged;
- Estimates of the total quantity discharged;
- Estimates of the quantity discharged to and name of affected navigable waters;
- The source of the discharge;
- A description of all affected media;
- The cause of the discharge;
- Any damages or injuries caused by the discharge;
- Actions being used to stop, remove, and mitigate the effects of the discharge;
- Whether an evacuation may be needed;
- The names of individuals and/or organizations who have also been contacted; and
- Weather conditions at the time of the spill.

Record the following information from the Agencies contacted:

- Time of call;
- Name of person taking the report;



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page
14 of 26

- Any assigned identification number; and
- Any other information and comments.

3. Emergency Response Guide [112.7(a)(5)]:

Information from the following Sections have been organized into an emergency response guide and placed in Appendix G:

- Section VII.A.1.a
- Section VII.A.1.d
- Section VII.A.1.e
- Section VII.A.1.f
- Section VII.A.2

B. Potential Release Scenarios [112.7(b)]:

See Section VII.A.1.a for the potential release scenarios for this facility.

C. Containment and/or Diversionary Structures [112.7(c)]:

Except as noted below, all areas that contain oil (i.e. tanks, drums, totes, pipes, etc.) at this facility have appropriate containment and/or diversionary structures or equipment to prevent discharged oil from reaching the Little Klickitat River. The facility uses one or more of the following systems to contain oil:

1. Offshore Facilities [112.7(c)(2)]:

Not applicable at this facility

2. Onshore Facilities [112.7(c)(1)]:

- ☒ Dikes, berms, or retaining walls sufficiently impervious to contain spilled oil
- ☐ Curbing
- ☒ Culverting, gutters, or other drainage systems
- ☒ Weirs, booms, or other barriers
- ☒ Spill diversion ponds/Secondary containment structures
- ☒ Retention ponds
- ☒ Sorbent Material
- ☐ Double Wall
- ☒ Sumps and collection systems
- ☐ There are containers or loading/unloading areas onsite where containment and/or diversionary structures may not be practicable for preventing a discharge to navigable water (Complete Section D below).

Potential spills from totes, drums, pipelines, and tanks are contained by the building



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page
15 of 26

itself. The building serves as adequate containment and is outfitted with trench drains in front of the warehouse entrances. These trenches are tied in to the low-point dock trench drain that can hold 57,750 gallons.

The general containment requirements for oil-filled operation equipment are described in Section VII.K.

D. Containment and/or Diversionary Structures Exception [112.7(d)]:

After careful consideration and review, it has been determined that the facility has adequate containment and/or diversionary structures so this regulatory provision does not apply to this facility.

1. Oil Spill Contingency Plan [112.7(d)(1)]:

After careful consideration and review, it has been determined that this regulatory provision does not apply to this facility.

2. Written Commitment [112.7(d)(2)] :

This facility is committed to respond to any oil spill. This commitment includes manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

E. Inspections, Tests and Records [112.7(e)]:

All inspections and tests required by this Plan are conducted in accordance with written procedures. These procedures and all records associated with inspections and tests will be signed by the appropriate supervisor or inspector and retained onsite for a period of three years.

F. Personnel Training And Spill Prevention Procedures [112.7(f)]:

1. Personnel Training [112.7(f)(1) and (3)]:

ALL PERSONNEL will be instructed in the general operational guides of the facility and know the location of the SPCC Plan, the location and use of the call list, and when the SPCC Plan is activated.

All oil-handling personnel (including contractors) engaged in the operation and maintenance of equipment will be properly instructed to ensure that they are able to prevent discharges and respond effectively in case of a discharge. Personnel will be trained to be familiar with 1) the discharge procedure protocols; 2) applicable pollution control laws, rules, and regulations; 3) contents of the SPCC Plan; 4) describe known discharges and near misses related to the discharge of oil; and, 5) review precautionary measures associated with releases. Such training will be conducted at a minimum of once a year. New hires or transferees involved with oil-handling will be instructed in the contents of this plan within six months of their starting date.

2. Responsible Plant Individual for Spill Prevention and Training [112.7(f)(2)]:

David Bischoff, Facility Lead Person



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page
16 of 26

G. Security [112.7(g)]:

- The facility is fully fenced and/or the facility's oil handling, processing, or storage locations are fully fenced, and locked when the facility is not in production or is unattended. Motion detection is tied into the alarm panel.
- The facility will ensure that the master flow and drain valves and any other valves permitting direct outward flow of the container's contents to the surface have adequate security measures so that they remain in the closed position when in non-operating or standby status.
- The starter control on each oil pump will be turned off and located in a secured building accessible only to authorized personnel when the pump is in a non-operating or non-standby status.
- The loading/unloading connections of oil pipelines or facility piping when not in service or when in standby service for an extended time will be securely capped or blank-flanged. This security practice also applies to piping that is emptied of liquid content either by draining or by inert gas pressure.
- Facility lighting is commensurate with the type and location of the facility. It also assists in the discovery of discharges at night or through the acts of vandalism.

H. Loading, Transferring, Or Unloading Operations [112.7(h)]:

1. Secondary Containment For Tank Trucks and Railcars [112.7(h)(1)]:

The facility has the capability to offload bulk truck shipments of mint oil through a filter station into totes and Tank E; however, the facility no longer receives mint oil via tank truck. In the event the facility resumes use of a tank truck for mint oil shipment and delivery ADM will revise this plan.

The most likely spill event associated with loading/unloading activities would be a spill from one or more 55-gallon drums during mint oil drum offloading from delivery trucks. Spills would flow north into and be totally contained within the loading dock containment basin.

2. Warning or Barrier System for Vehicles [112.7(h)(2)] :

Brakes will be properly set and wheel chocks properly positioned to prevent premature departure of vehicles.

3. Vehicle's Lowermost Drainage Outlet Examined Before Leaving [112.7(h)(3)] :

No vehicle will be allowed to be moved until it has been inspected to show all valves are closed, sealed (when appropriate), and not leaking and the hose is disconnected.

I. Brittle Fracture Evaluation [112.7(i)]:

When a field-constructed aboveground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe, the container will be evaluated prior to the change to



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page
17 of 26

determine if the container is at risk. If necessary, appropriate action will be taken.

J. State Rules and Regulations [112.7(j)]:

After careful consideration and review, it has been determined that the State of Washington does not have any additional regulatory provision for oil storage and spill response based on the operations at this facility.

K. Qualified Oil-Filled Operational Equipment [112.7(k)]:

After careful consideration and review, it has been determined this section does not apply to my facility as the facility does not have any company-owned oil-filled operational equipment.

1. Qualification Criteria-Reportable Discharge History [112.7(k)(1)] :

After careful consideration and review, it has been determined this section does not apply to my facility as the facility does not have any company-owned oil-filled operational equipment.

2. Alternative Requirements to General Secondary Containment [112.7(k)(2)] :

After careful consideration and review, it has been determined this section does not apply to my facility as the facility does not have any company-owned oil-filled operational equipment.

PART B & C - REQUIREMENTS FOR PETROLEUM OILS AND NON-PETROLEUM OILS, AND ANIMAL FATS AND OILS AND GREASES, AND FISH AND MARINE MAMMAL OILS; AND VEGETABLE OILS

VIII. SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN REQUIREMENTS FOR ONSHORE FACILITIES (EXCLUDING PRODUCTION FACILITIES) [112.8 & 112.12]

A. Spill Prevention, Control, and Countermeasure Plan Compliance [112.8(a) & 112.12(a)]:

This plan has been written to meet the general requirements listed under 40 CFR 112.7 and the specific discharge prevention and containment procedures listed in 40 CFR 112.8 and 112.12.

B. Facility Drainage and Containment Control [112.8(b) & 112.12 (b)]:

1. Draining Storm Water from Containment Area(s)

The containment pond for the facility has a drain valve. It is locked closed until used and the Facility Manager or his designee maintains control of the key. The pumps used at the dock is manually activated and does empty the containment area. Before any storm water is removed, the water will be inspected to ensure no oil will be discharged [112.8(b)(1) & 112.12(b)(1)]. Note that if drain valves are used they must be manual or manually operated electrical, open-and-closed design. Flapper-type drain valves are not permitted [112.8(b)(2)] .

Uncontaminated rainwater may be discharged from a containment area into a storm



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page
18 of 26

water drain or into an open waterway if: 1) the bypass valve is kept closed other than to discharge uncontaminated storm water; 2) the storm water is free of oil;

3) drainage is done under responsible supervision; and, 4) adequate records are kept of such events. Appendix C contains a copy of the inspection log that may be used for recording events. Such records will be kept for a minimum of three years.

If oil is found in storm water accumulated in the loading dock trench, the contaminated water will be pumped into totes or drums and dewatered. The oil is then collected for recovery/distillation [112.8(c)(3)(i-iv) & 112.12(c)(3)(i-iv)].

2. Description Of Drainage System for Undiked Areas [112.8(b)(3) & 112.12(b)(3)]

Potential releases from totes and drums that are stored outdoors in the paved west portion of the site would flow towards the stormwater pond in the northwest corner of the property. Ditches along the west and north boundaries of the site direct all other drainage into the basin. Stormwater on the site accumulates in the pond and eventually percolates or evaporates.

3. Use of Diversion System in Final Discharge from Ditches within the Facility [112.8(b)(4) & 112.12(b)(4)]

After careful consideration and review, it has been determined that 40 CFR 112.8(b)(4) and 112.12(b)(4) do not apply to this facility.

4. Redundant Pumps For Storm Water Transfer Pumping System(s) [112.8(b)(5) & 112.12(b)(5)]

After careful consideration and review, it has been determined that 40 CFR 112.8(b)(5) and 112.12(b)(5) do not apply to this facility.

C. Bulk Storage Containers [112.8(c) & 112.12(c)]:

1. Tank Compatibility With Its Contents [112.8(c)(1) & 112.12(c)(1)]:

The materials stored in bulk storage containers at this facility are compatible with the materials used in their construction and the type of construction. They are compatible with the conditions of storage such as pressure and temperature.

2. Containment Volume and Construction for Bulk Storage Containers [112.8(c)(2) & 112.12(c)(2)]:

The tanks are contained by the building itself. The building serves as adequate containment and is outfitted with trench drains in front of each warehouse entrance. These trenches then drain to the unloading dock that has a containment volume of 57,750 gallons.

As stated in section B-2 above, secondary containment for totes and drums stored outdoors in the paved west portion of the site is provided by drainage ditches along the



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page
19 of 26

west and north site boundaries and the stormwater pond basin in the northwest corner of the property.

See Appendix D for the containment volume calculation.

3. Corrosion Protection for Underground Storage Tanks [112.8(c)(4)&112.12(c)(4)]:

After careful consideration and review, it has been determined that the above regulatory provisions do not apply to this facility because the facility has no underground storage tanks not regulated by 40 CFR 280.

4. Corrosion Protection for Partially Buried or Bunkered Storage Tanks [112.8(c)(5) & 112.12(c)(5)]:

After careful consideration and review, it has been determined that the above regulatory provisions do not apply to this facility because the facility has no buried or bunkered storage tanks.

5. Integrity Testing and Inspection of Aboveground Storage Containers [112.8(c)(6) & 112.12(c)(6)]:

Each aboveground storage container will be tested for integrity on a regular schedule according to ADM's corporate procedures, or whenever it requires material repairs. The frequency of and type of testing done are based on the corporate procedure and/or previous integrity testing results. Appendix J contains the tank list with it's associated testing schedule. The corporate procedure was developed using existing standards as a guide. Please note that the tank list in Appendix J is only for the scheduling of the initial integrity test for each tank. If the tank has been integrity tested then the next and subsequent scheduled testing will be according to ADM's corporate procedures and Design Services evaluation of the testing data. In between integrity tests all tanks subject to this Plan will be visually inspected semi-annually at a minimum. The visual inspection will also include oil-filled operational and manufacturing equipment, drums, and pipelines as applicable. The visual inspection may be more frequent if it is indicated in the schedule found in Appendix J. These inspections will be documented at the frequency indicated in Appendix J. Appendix B contains a copy of the checklist used to complete the inspections. In addition, the outside of the containers is frequently checked for signs of deterioration, discharges, or accumulation of oil inside diked areas although these checks are not recorded. Records of the visual inspections and tests will be kept according to Section VII.E of this Plan.

6. Internal Heating Coils [112.8(c)(7) & 112.12(c)(7)]:

After careful consideration and review, it has been determined that the above regulatory provisions do not apply to this facility because none of the storage containers use internal heating coils.

7. Fail-Safe Engineered Equipment for Bulk Storage Tanks [112.8(c)(8) & 112.12(c)(8)]:



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page
20 of 26

Tanks A – D have high level alarms. Tank E is managed by records as it is operated in batches. The tanks are operated in batch mode and is filled and emptied between uses. On occasion the tanks may sit overnight. An employee is present to monitor the loading and unloading of the tanks.

8. Effluent Observation [112.8(c)(9) & 112.12(c)(9)]:

The facility periodically observes storm water discharges outfalls to detect possible system upsets that could cause a release of oil to the navigable waters of the state.

9. Visible Oil Leaks [112.8(c)(10) & 112.12(c)(10)]:

The facility will promptly correct visible leaks which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts. The facility will promptly remove any accumulations of oil in diked areas.

10. Positioning of Mobile/Portable Storage Tanks [112.8(c)(11) & 112.12(c)(11)]:

If a mint oil drum or tote is found to be leaking the drum or tote is moved indoors. The oil will be transferred into an intact container and the drum or tote will be rinsed and removed from service. Mint oil drums and totes stored indoors are contained by the building itself. The building serves as adequate containment and is outfitted with trench drains in front of each warehouse entrance. These trenches then drain to the unloading dock that has a containment volume of 57,750 gallons. Totes that are stored outdoors drain to a detention pond on the northwest corner of the property where it will be contained. See Appendix D for the containment volume calculation.

Please note that from time to time portable tanks may be brought onsite for short term use. These tanks will be provided secondary containment but if it is scheduled to be onsite for less than 6 months it will not be added to the SPCC plan. If the portable tank is to be onsite or if it becomes apparent that the tank will be onsite for 6 months or longer then the plan will be updated to include the portable tank. (Six months because 40 CFR 112.5(a) allows up to six months to update the plan when changes occur).

D. Facility Transfer Operations, Pumping, And Facility Process [112.8(d) & 112.12(d)]:

1. Buried Piping Installation Protection [112.8(d)(1) & 112.12(d)(1)]:

After careful consideration and review, it has been determined that the above regulatory provision does not apply to this facility because the facility has no underground pipelines in oil service. However, if a pipeline is to be installed underground, it will be covered with a protective wrapping and/or coating. Also, the pipeline will be cathodically protected or otherwise satisfy the corrosion protection standards for piping in part 280 of this chapter or a State program approved under part 281 of this chapter.

Note that if a section of buried line is exposed for any reason, it will need to be carefully inspected for deterioration and if corrosion damage is found, additional examination and corrective action will be conducted based on the magnitude of the damage.

2. Not-In-Service and Standby Piping [112.8(d)(2) & 112.12(d)(2)]:



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page
21 of 26

Food safety and defense programs require that no piping, in service or standby, may be exposed to potential contamination so all piping is capped when disconnected from the tanks.

3. Pipe Support Design [112.8(d)(3) & 112.12(d)(3)]:

All aboveground transfer lines shall have supports and brackets to allow for thermal expansion, contraction, and abrasion resistance.

4. Inspection and Integrity Testing of Pipelines [112.8(d)(4) & 112.12(d)(4)]:

The facility will conduct visual inspections of all aboveground pipelines semi-annually at a minimum. These inspections will be documented. Appendix B contains a copy of the checklist used to complete the inspections. Included in this inspection will be all aboveground valves, piping, and appurtenances. Also included is an assessment of the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. The facility will conduct integrity and leak testing of buried piping at the time of installation, modification, construction, relocation, or replacement. Records of the visual inspections and tests will be kept according to Section VII.E of this Plan.

5. Aboveground Piping Protection From Vehicular Traffic [112.8(d)(5) & 112.12(d)(5)]:

All aboveground piping is limited to the area around Tanks A –E inside the building. The layout of the tanks prevents fork truck traffic from contacting aboveground piping.

IX. SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN REQUIREMENTS FOR ONSHORE OIL PRODUCTION FACILITIES [112.9]

Not applicable to this facility.

X. SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN REQUIREMENTS FOR ONSHORE OIL DRILLING AND WORKOVER FACILITIES [112.10]

Not applicable to this facility.

XI. SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN REQUIREMENTS FOR OFFSHORE OIL DRILLING, PRODUCTION, OR WORKOVER FACILITIES [112.11]

Not applicable to this facility



**Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients**

Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued 8/20/2021	Document # NA	Version 4	Page
---------------------------------	-------------------------	---------------------	-------------

APPENDIX A
FACILITY DRAWING



**Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients**

Wild Flavors & Specialty Ingredients SPCC Plan			
Date Issued 8/20/2021	Document # NA	Version 4	Page

APPENDIX B

SEMI-ANNUAL FACILITY INSPECTION CHECKLIST



**Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients**

Wild Flavors & Specialty Ingredients SPCC Plan			
Date Issued 8/20/2021	Document # NA	Version 4	Page

APPENDIX C

STORM WATER INSPECTION FORM



Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients

Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page



STORM WATER INSPECTION PRIOR TO DISCHARGE
ADM Wild Flavors & Specialty Ingredients

Date of Inspection / Sample:

Name (printed):

Procedures:

Inspect (visually) and test storm water accumulated in secondary containment structures and around closed storm water drains prior to discharge. If water is visually clean and falls within the neutral pH range (6.0 – 9.0) and a COD value of <120 or TC of <150 the water may be discharged as normal storm water. If there are any visual signs of water contamination (i.e. sheen) or the water has an acidic/basic pH, or COD above 120 mg/L, then accumulated storm water will be discharged to the waste treatment facility or other alternative disposal as approved by the Environmental Department. Note: a COD/TC analysis is not required to be performed on chemical berms, or the fueling station sump prior to discharge.

Containment Area / Storm Drain ID	Date / Time of Discharge	Presence of Oil Sheen	Discharge Location	COD or TC Results (ppm)	pH Results
Unloading Dock		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Storm Drain <input type="checkbox"/> Drainage Ditch <input type="checkbox"/> WWTP		
Containment Pond		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Storm Drain <input type="checkbox"/> Drainage Ditch <input type="checkbox"/> WWTP		
West Drainage Ditch		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Storm Drain <input type="checkbox"/> Drainage Ditch <input type="checkbox"/> WWTP		
North Drainage Ditch		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Storm Drain <input type="checkbox"/> Drainage Ditch <input type="checkbox"/> WWTP		

Prior to discharging stormwater to the WWTP, Utilities Supervision must be notified.

Date:

Time:

Contacted:

Stormwater Drain Valve Closed and Locked after discharge (If Applicable).

Date:

Time:

Comments:

The storm water was inspected and discharged in compliance with our facility's SPCC and SWP3 plan.

Signature of ADM Employee

Forward Original of report to Environmental Department:

Date Received:

By:



**Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients**

Wild Flavors & Specialty Ingredients SPCC Plan			
Date Issued 8/20/2021	Document # NA	Version 4	Page

**APPENDIX D
CONTAINMENT CALCULATIONS**



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued	Document #	Version	Page
8/20/2021	NA	4	

Containment Volume Calculations

Unloading Dock Containment

Calculate Volume

$$A: 4 \text{ ft} \times 30 \text{ ft} \times 40 \text{ ft} = 4,800 \text{ ft}^3 B:$$

$$\frac{1}{2} \times 4 \text{ ft} \times 30 \text{ ft} \times 50 \text{ ft} = 3,000 \text{ ft}^3$$

$$\text{Total} = 7,800 \text{ ft}^3$$

$$7,800 \text{ ft}^3 \times 7.4805 \text{ gal/ft}^3 = 58,348 \text{ gal}$$

Volume of Largest Tank (Maximum Spill Volume)

$$\text{Tank E: } 6,993 \text{ gallons or } = 934.83 \text{ ft}^3$$

Calculate Volume Remaining in Containment for Storm Water

$$7,800 \text{ ft}^3 - 934.83 \text{ ft}^3 = 6,865.17 \text{ ft}^3$$

Calculate Inches of Storm Water Needed to Fill V_s

$$6,865.17 \text{ ft}^3 / (30 \text{ ft} \times 90 \text{ ft}) = 2.54 \text{ ft} \times 12 \text{ in/ft} = 30.48 \text{ in} - \text{Adequate}$$

Containment Pond – Northwest Corner of Property

Calculate Approximate Gross Volume

$$68 \text{ ft} \times 38 \text{ ft} \times 3.5 \text{ ft} = 9,044 \text{ ft}^3$$

$$9,044 \text{ ft}^3 \times 7.4805 \text{ gal/ft}^3 = 67,654 \text{ gal}$$

Volume of Largest Container

$$\text{Tote: } 275 \text{ gal or } = 36.76 \text{ ft}^3$$

Calculate Volume Remaining for Storm Water

$$9,044 \text{ ft}^3 - 36.76 \text{ ft}^3 = 9,007.24 \text{ ft}^3$$

Calculate Runoff Coefficient

Pervious area:

$$A: \frac{1}{2} \times 138 \text{ ft} \times 74 \text{ ft} = 5,106.0 \text{ ft}^2$$

$$B: 15 \text{ ft} \times 234 \text{ ft} = 3,510.0 \text{ ft}^2$$

$$C: 70 \text{ ft} \times 40 \text{ ft} = 2,800.0 \text{ ft}^2$$

$$D: 7 \text{ ft} \times 6 \text{ ft} = 42.0 \text{ ft}^2$$

$$E: 30 \text{ ft} \times 91 \text{ ft} = 2,730.0 \text{ ft}^2$$

$$\text{Total: } 14,188.0 \text{ ft}^2$$

$$14,188.0 \text{ ft}^2 / 43,560 \text{ ft}^2/\text{ac} = 0.33 \text{ ac}$$

Impervious area:

$$F: 30 \text{ ft} \times 83 \text{ ft} = 2,490.0 \text{ ft}^2$$

$$G: 234 \text{ ft} \times 128 \text{ ft} = 32,442.0 \text{ ft}^2$$

$$H: 30 \text{ ft} \times 57 \text{ ft} = 1,710.0 \text{ ft}^2$$

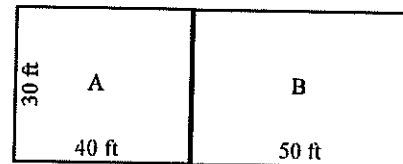
$$\text{Total: } 36,642.0 \text{ ft}^2$$

$$36,642.0 \text{ ft}^2 / 43,560 \text{ ft}^2/\text{ac} = 0.84 \text{ ac}$$

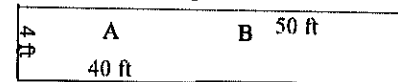
Total area:

$$36,642.0 \text{ ft}^2 + 14,188.0 \text{ ft}^2 = 50,830.0 \text{ ft}^2 / 43,560 \text{ ft}^2/\text{ac} = 1.17 \text{ ac (A)}$$

A 24 hr 25 yr storm event is approximately 2.88 in



Top view



Side view





Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page

APPENDIX E
OIL SPILL CONTINGENCY PLAN



Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients

Wild Flavors & Specialty Ingredients SPCC Plan			
Date Issued 8/20/2021	Document # NA	Version 4	Page

1.0 Responsibilities and Duties (40 CFR §109.5 (a))

The following is a list of personnel and organizations that would respond to a release of oil that would potentially reach navigable water. Included in the list will be the responsibilities and duties of each person or organization. Note that the size of the release will determine the size and scope of the response.

Title / Organization	Responsibilities	Duties
A.	a.	a.

2.0 Notification Procedure

2.1 Identification of Downstream Critical Water Use Areas Potentially Impacted by a Release (40 CFR §109.5 (b)(1))

The following is a list of facilities, communities, drinking water intakes, environmentally sensitive areas (ESA) potentially impacted by a release of oil to the navigable waters. Included is an estimate of the time it would take for the spill to reach the identified area under a worst case scenario and the distance from the facility as the water flows.

	Name of Facility, Community, Drinking Water Intake, or ESA	Contact Person	Contact Phone Number	Distance from Facility	Estimated Arrival Time
A.					

2.2 Call List (40 CFR §109.5 (b)(2))

Section VII.A.1.f contains the notification list. The list is to be used in the event of a release that reaches or threatens to reach navigable waters.

2.3 Communication Requirements (40 CFR §109.5 (b)(3))

The facility has access to telephones located throughout the facility to make timely notification of a spill. Also, most operators are in contact by radio with other operators or management.

These radios will be available for use in case of a release.

3.0 Spill Response Equipment (40 CFR §109.5 (c)(1)& (2))

Part VII.A.1.d lists the response equipment available on site to respond to a release. In the event of a spill beyond the capability of the equipment available on site the following equipment is available to the facility from the community, state, and/or contractors.



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page

	Name of Organization	Equipment Available	Response Time
Community			
1.			
State			
1.			
Contractors			
1.			

3.1 Agreements and Arrangements for Acquisition of Spill Response Equipment (40 CFR §109.5 (c)(3))

The facility has verbal agreements with the above-mentioned organizations to supply equipment, materials, and/or supplies, which would be required in responding to a large release.

4.0 Provisions For Well-Defined And Specific Actions To Be Taken After Discovery And Notification Of A Release

4.1 Initial Response Team (40 CFR §109.5 (d)(1)&(2))

All members of the initial response team as identified in Section 1.0 of this appendix are trained as described in Section VII.F of this plan and are familiar in the use of the onsite response equipment. All member of the team are prepared and available to respond to a release when notified.

4.2 Communication Center (40 CFR §109.5 (d)(3))

Due to the size of the operation and the size of the potential spill the location for an oil discharge response operations center will be at the site of the spill. Cell phones and/or radios will be used for communication for directing and coordinated the response operations.

4.3 Provisions For Varying Degrees Of Response (40 CFR §109.5 (d)(4))

Section 3.0 of this commitment identifies the availability of response provisions as needed. The potential size of a spill at the facility is medium spills (2,100 to 36,000 gal). This facility has the provisions to respond to a small spill. Any spill larger than this, the facility will contact the organization listed in Section 3.0 to aid in the response and/or cleanup.

4.4 Water Use Protection Priority (40 CFR §109.5 (d)(5))

In most cases the facility has only one body of water to protect so its protection is the priority. If a release from a facility can impact more than one waterbody the priority will be determined using the following:

- If the waterbodies are in series, then the first waterbody will be the priority as its protection will protect the other waterbodies downstream.
- If the waterbodies are in parallel, then the facility will use the following criteria to determine which waterbody is the priority:



Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients

Wild Flavors & Specialty Ingredients SPCC Plan			
Date Issued 8/20/2021	Document # NA	Version 4	Page

- Federal and State threatened and endangered species
- Natural resource areas; Federal, State, Regional, and privately-owned and managed
- drinking water intakes
- industrial water intakes
- locks and dams
- marinas and boat accesses

Based on this information the priority for the protection of the waterbodies is as follows:

Priority Rank	Name of Waterbody
1.	

5.0 Procedures To Facilitate Recovery Of Damages (40 CFR §109.5 (e))

Not Applicable



**Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients**

Wild Flavors & Specialty Ingredients SPCC Plan			
Date Issued 8/20/2021	Document # NA	Version 4	Page

APPENDIX F
**CERTIFICATION OF THE APPLICABILITY OF THE
SUBSTANTIAL HARM CRITERIA**



Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients

Wild Flavors & Specialty Ingredients SPCC Plan			
Date Issued 8/20/2021	Document # NA	Version 4	Page

Attachment C-II (SEE NOTE BELOW – NOT APPLICABLE)

Certification of the Applicability of the Substantial Harm Criteria

Facility Name: ADM Wild Flavors and Specialty Ingredients
ADM Address: 1500 South Columbus Avenue, Goldendale WA 98620

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
Yes ____ No X
2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
Yes ____ No X
3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula¹) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to this part, section 10, for availability) and the applicable Area Contingency Plan.
Yes ____ No X
4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake²?
Yes ____ No X
5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
Yes ____ No X

If any of the answers to questions 1 – 5 are yes, a Facility Response Plan is required.



Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients

Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued	Document #	Version	Page
8/20/2021	NA	4	

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

David Bischoff
Signature

Facility Lead Person
Title

David Bischoff
Name (please type or print)

10/19/21
Date



**Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients**

Wild Flavors & Specialty Ingredients SPCC Plan			
Date Issued 8/20/2021	Document # NA	Version 4	Page

**APPENDIX G
EMERGENCY RESPONSE GUIDE**



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page

Call List

	<u>Business Phone</u>	<u>Other Phone</u>	<u>Cellular Phone</u>
<u>Plant Contacts</u>			
1 st - David Bischoff	(509) 773-4008		(509) 261 0025
2 nd - Will Bowdish	(509) 773-4008		(509) 261-0901
3 rd - Amanda Richards	(509) 773-4008		
<u>Corporate Contacts</u>			
Rich Stephens	(319) 398-0735		(319) 310-0084
Frank Cobbett			(905) 703-4097
<u>Regulatory Contacts</u>			
National Response Center	(800) 424-8802		
Washington Department of Ecology – Spill Hotline	(800) OILS-911	(800) 258-5990	
Washington Department of Ecology – Central Region	(509) 575-2490		
<u>Contractors (to be called in as needed)</u>			
National Response Corp – Pasco Office	(800) 899-4672	(509) 545-6110	

Countermeasures for Discharge Discovery, Response, and Cleanup:

In the Event of a Spill:

In the event of a small, incidental release 25 gallons or less, the following steps will be taken:

1. Upon detection of a release, the discovering employee will assess the spill and determine if he or she is able to contain the spill safely. If so, the discovering employee will use shovels and/or onsite earth moving equipment to construct a berm around the affected area and/or deploy sorbents to contain the spilled product(s).
2. The discovering employee will contact the facility lead person and other available trained personnel to shut down operations, if required, and initiate further containment and cleanup activities. Put on necessary protective equipment (i.e., goggles, rubber gloves, etc.) and clean up the spill. Use appropriate safety-designed equipment, pumps, and hoses to pump oil product into tankers or any other appropriately sized container.
3. The facility lead person will call all appropriate ADM management and environmental resources. Utilize the Plant Call List below (as appropriate).
4. Call in contracted help, if necessary. Ensure they bring appropriate equipment to aid in the response and/or cleanup of the spill.



**Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients**

Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page

5. Containerize, label, and dispose of contaminated soil and other materials such as sorbents, PPE, etc. Solid and/or hazardous waste contractors and disposal facilities will be contacted to determine an appropriate disposal destination for the oil containing materials. The facility lead person and area environmental manager will ensure waste is properly stored and disposed of, and disposal documentation is retained.
6. The facility lead person and facility personnel will ensure the emergency equipment is decontaminated and returned to locations listed in this plan. Consumable materials such as sorbents and PPE used during spill response will be replaced, as necessary.
7. The facility lead person or their designee(s) will check for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, tanks, or other equipment before operations resume.

In the event of a spill greater than 25 gallons, the following steps will be taken:

1. Upon detection of a release, the discovering employee will assess the spill and determine if he or she is able to contain the spill safely. If so, the discovering employee will use shovels and/or onsite earth moving equipment to construct a berm around the affected area and/or deploy sorbents to contain the spilled product(s).
2. The discovering employee will contact the facility lead person and other available trained personnel to shut down operations, assess potential threats to human health and the environment, and if possible, initiate containment and cleanup activities. If necessary, supervisory staff may decide to evacuate the affected area, in which case notification will occur through radio receivers and telephones.
3. Put on necessary protective equipment (i.e., goggles, rubber gloves, etc.) and initiate containment and cleanup, if possible. Use appropriate safety-designed equipment, pumps, and hoses to pump oil product into tankers or any other appropriately sized container.
4. Supervisory personnel will call ADM management, environmental resources, and emergency responders (911), if appropriate. Utilize the Plant Call List below (as appropriate).
5. Call in contracted help, if necessary. Ensure they bring appropriate equipment to aid in the response and/or cleanup of the spill.
6. The facility lead person and the area environmental manager will notify the local authorities, appropriate regulatory agencies, and National Response Center, if required. Phone numbers are located in Appendix A.
7. Containerize, label, and dispose of contaminated soil and other materials such as sorbents, PPE, etc. Solid and/or hazardous waste contractors and disposal facilities will be contacted to determine an appropriate disposal destination for the oil containing materials. The facility lead person and area environmental manager will ensure waste is properly stored and disposed of, and disposal documentation is retained.



**Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients**

Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page

8. The facility lead person and facility personnel will ensure the emergency equipment is decontaminated and returned to locations listed in this plan. Consumable materials such as sorbents and PPE used during spill response will be replaced, as necessary.
9. The facility lead person or their designee(s) will check for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, tanks, or other equipment before operations resume.
10. The area environmental manager and facility lead person will complete and submit the proper spill forms and reports required by state and federal agencies.

Equipment Immediately Available On-Site To Respond To A Spill:

Equipment	Quantity	Storage Location
Pumps – Positive Displacement; air diaphragm	4	In production area
Shovels	5	1 inside, balance in shed
Hoses	Suction & discharge each pump	Attached to pumps
Absorbent Material	100 pads. 24 qtrs. floor dry	Cabinet and shed.
Absorbent Material	100 pads. 1 pillow	Spill kit drum
Drums	1	Spill Kit drum
Personal Protective Equipment	1 Respirator; lots of gloves & safety glasses	Cabinets
Personal Protective Equipment	2 goggles & 2 pair of gloves	Spill kit drum
Booms	40 – 42"	Rack A 9
Booms	12 – 3"X48"	Spill kit drum
Brooms and squeegees	5	Wall rack
Pumps – Positive Displacement; air diaphragm	4	In production area

Disposal of Recovered Material:

All impacted materials recovered during spill response activities will be disposed of in accordance with local, state, and/or federal regulations, laws, and/or ordinances.

Permits may be required to transport and dispose of recovered and contaminated materials or equipment. Generally, waste characterization will be required prior to determining where the recovered material can be properly disposed. The area environmental manager and the facility lead person will be responsible for ensuring that all proper permits are received prior to transport or disposal of the recovered materials. Manifests, bills of lading, and other pertinent disposal documentation will be retained onsite.



**Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients**

Wild Flavors & Specialty Ingredients SPCC Plan			
Date Issued 8/20/2021	Document # NA	Version 4	Page

Discharge Reporting Information:

At a minimum, the following information needs to be recorded during a discharge (See Appendix H for an example of a form which may be used):

- Exact address or location and phone number of the facility;
- The date and time of the discharge;
- The type of material discharged;
- Estimates of the total quantity discharged;
- Estimates of the quantity discharged to and name of affected navigable waters;
- The source of the discharge;
- A description of all affected media;
- The cause of the discharge;
- Any damages or injuries caused by the discharge;
- Actions being used to stop, remove, and mitigate the effects of the discharge;
- Whether an evacuation may be needed;
- The names of individuals and/or organizations who have also been contacted; and
- Weather conditions at the time of the spill.

Record the following information from the Agencies contacted:

- Time of call;
- Name of person taking the report;
- Any assigned identification number; and
- Any other information and comments.



Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page

**APPENDIX H
SPILL REPORT FORM**



Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients

Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued
8/20/2021

Document #
NA

Version
4

Page

SPILL RESPONSE NOTIFICATION FORM

FACILITY INFORMATION

Date of Call: _____

Time of Call: _____

Facility Name: _____

INCIDENT INFORMATION

Reporting Personnel: Last Name: _____

First: _____

Position: _____

Phone: _____

Date of Incident: _____

Time: _____ a.m. / p.m.

Location of Incident: _____

Cause of Incident: _____

Source of Incident: _____

Name of Affected Navigable Waters: _____

Estimate Quantity Discharged to Navigable Waters: _____

Description of All Media Affected: _____

Weather Condition: _____

Temperature: _____ °F

Wind Speed: _____

knots / mph

Direction: _____



**Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients**

Wild Flavors & Specialty Ingredients SPCC Plan			
Date Issued 8/20/2021	Document # NA	Version 4	Page

**APPENDIX I
IMPLEMENTATION SCHEDULE**



**Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients**

Wild Flavors & Specialty Ingredients SPCC Plan			
Date Issued 8/20/2021	Document # NA	Version 4	Page

As of the date this report was prepared, there were no items identified which required implementation.



**Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients**

Wild Flavors & Specialty Ingredients SPCC Plan			
Date Issued 8/20/2021	Document # NA	Version 4	Page

**APPENDIX J
INTEGRITY TESTING**



Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients

Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued	Document #	Version	Page
8/20/2021	NA	4	

Facility AST Integrity Testing Reports for SPCC Compliance
Facility AST Integrity Testing Reports for SPCC Compliance

ADM/Wild Flavors – Goldendale, WA

The clock starts November 10, 2010 for performing Category 1, 2 or other forms of integrity testing beyond visual and semiannual inspections.

<u>Tank No.</u>	<u>Integrity Testing</u>	<u>Frequency of testing</u>
Tank A	Visual	Monthly Inspections Document semi-annual inspections
Tank B	Visual	Monthly Inspections Document semi-annual inspections
Tank C	Visual	Monthly Inspections Document semi-annual inspections
Tank D	Visual	Monthly Inspections Document semi-annual inspections
Tank E	Visual	Monthly Inspections Document semi-annual inspections

Suggested AST Tank Integrity Testing Options:

- Category 1:** Types include hydrostatic, ultrasonic, extensive interior inspection or other nondestructive type of integrity testing. This category focuses primarily on integrity testing methods for shop built ASTs, These methods include, but are not limited to hydrostatic, ultrasonic, and interior inspections.
- Category 2:** Types of integrity testing includes ultrasonic, radiographic, acoustic or other nondestructive method of testing. These integrity tests are recommended for field-erected tanks and include ultrasonic, radiographic, and acoustic.
- Category 3:** If a facility does not have a form of leak detection for this tank, reduce the test interval by 3 years for each level of risk. The test interval between integrity tests may be reduced if the AST does not have a form of leak detection.

Integrity Testing Notes:

- Note 1:** Double wall tanks are considered to have adequate secondary containment with the exterior tank covering the primary one.
- Note 2:** Water paste (a paste that changes colors when exposed to water) or an internal inspection of the tank, if possible, may be used annually to assure there is no water (corrosion) in steel tanks holding petroleum hydrocarbons.
For double walled tanks the interstitial space should also be checked for water.
- Note 3:** For non-steel tanks the condition of the material should be inspected monthly for cracking, UV damage, discoloration, general wear, etc. Some types of testing cannot be used as with steel tanks.
- Note 4:** Drop documented monthly inspections for undocumented monthly inspections if a leak detection system is in place.
A Semiannual inspection may be substituted for documented monthly inspection (once every six months). Undocumented monthly inspections require documented semiannual inspections.



Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients

Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued	Document #	Version	Page
8/20/2021	NA	4	

- Note 5:** Persons who perform undocumented monthly inspections should be able to explain contents of 'Monthly SPCC Inspection Checklist'.
- Note 6:** Documented monthly inspections will substitute for semi-annual ones. Every six months a Semiannual Facility Inspection Checklist may be substituted for a documented Monthly SPCC Inspection Checklist.
- Note 7:** Double-walled tanks have adequate secondary containment if the outer shell is in good condition and there are spill prevention materials near the tank.

Integrity Testing and Frequency of Testing Terminology:

Visual -- Refers to a facility conducting a visual inspection of an AST based on the Monthly SPCC Inspection Checklist. The EPA has determined visual inspection of shop built tanks that have all sides visible is acceptable for integrity testing.

Limited Visual -- Not all surfaces of an AST are visible, such as when it is covered by insulation or backed against a wall.

Monthly -- Refers to conducting monthly visual inspections of the AST based on the Monthly Inspection Checklist. This is an undocumented inspection.

Documented Monthly -- Refers to documenting AST monthly inspections. It is highly recommended that the facility use the Semiannual Facility Inspection Checklist found in their SPCC Plan for this inspection.

xx year testing -- Interval between performing integrity test beyond visual and semiannual inspections. Interval may be changed or accelerated under certain conditions. It is associated with Category 1 and 2.

General AST Integrity Testing Information:

Categories listed under columns for 'Types of Integrity Testing' are recommendations. Therefore, it is possible that a Category 2 recommended but actually a Category 1 test would be most appropriate

Examples of leak detection systems are weep holes in large tanks, sight glass in place of a metal plug in the bottom of a tank (typically associated with small shop built tanks) or a continuous statistical leak detection type system. A tank level indicator is not a form of leak detection.

***"Small Shop Built Tanks" have a capacity of 30,000 gallons or less. "Large Shop Built Tanks" have a capacity of 30,001 gallons to 50,000 gallons.

***"Other" includes poly, plastic, fiberglass or other nonmetallic material.

Please note that the survey is only for the scheduling of the initial integrity testing of the tank. If the tank has been integrity tested then the next and subsequence scheduled testing will be according to ADM's corporate procedures and Design Services evaluation of the testing data.



**Archer Daniels Midland Company
Wild Flavors & Specialty Ingredients**

Wild Flavors & Specialty Ingredients SPCC Plan

Date Issued 8/20/2021	Document # NA	Version 4	Page
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