Fleischmann's Vinegar

Fleischmann's Vinegar Company, Inc.
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December 18, 2014

Suzanne Powers
U.S. Environmental Protection Agency, Region 10
Washington Operations Office
300 Desmond Drive S.E., Suite 102
Lacey, Washington 98503

Re: *In the Matter of Fleischmann's Vinegar Company, Inc., Sumner, Washington,*
EPA Docket No. EPCRA-10-2014-0044
SEP Completion Report

Dear Ms. Powers,

In satisfaction of the terms of the February 26, 2014 Consent Agreement and Final Order (the "CAFO") between the U.S. Environmental Protection Agency ("EPA") and Fleischmann's Vinegar Company, Inc. ("Fleischmann's"), Fleischmann's provides this SEP Completion Report to describe its Supplemental Environmental Project ("SEP") and certify that the SEP has been fully implemented pursuant to the provisions of the CAFO.

Description of Fleischmann's Vinegar facility and activities

Fleischmann's is an industrial producer of white distilled vinegar at concentrations ranging from 5% to 30% acetic acid. The company has been making vinegar - a natural, fermentation-based food product - for almost 100 years. Fleischmann's manufactures vinegars and cooking wines for the industrial marketplace that are sold to food manufacturers.

Fleischmann's Sumner plant is located at 1115 Zehnder Street, Sumner, Washington 98390-1613, on leased property that is the northeast corner of a 14.96-acre industrial property owned by Bob Code, an owner of Northstar Chemical Company. Although the plant is located in Sumner's industrial park area, there are modest, single-family residences immediately adjacent to the plant on Zehnder Street and Steele Avenue.

The substances stored onsite include vinegar (3,500,000 lbs. max./2,100,000 lbs. avg.), ethyl alcohol 95% used in vinegar production (304,000 lbs. max./200,000 lbs. avg.), caustic soda solution – 25% sodium hydroxide for cleaning (2575 lbs. max./1800 lbs. avg.), and ammonia anhydrous for refrigeration (2300 lbs. max./1000 lbs. avg.). Fleischmann's facility is compliant with all regulations regarding handling, storage, and secondary containment of these substances.

Description of the SEP

Fleischmann's completed SEP is a facility-wide secondary containment system, including constructed earthen berms on the property perimeter, new fencing on top of and next to the berms, a new truck access with gate (to prevent trucks from having to drive over the berm) and storm drain upgrades (new connection and two shutoff valves). As engineered and constructed, the berm system will enable the property to contain a spill of 66,242 gallons.

To complete the project, Fleischmann's laid approximately 1,080 feet of sandy loam fill to form a berm around the property. A survey conducted by Leroy Surveyors in October, 2013 reflected a berm elevation of 65.5 feet for the property, requiring a berm height variance from 0.5 to 1.5 feet. The berm primarily protects the north and west borders of the property. Measurements in the survey showed that the areas on the east and south borders of the property were 66 feet and 67 feet, respectively, creating a natural elevation for containing a spill.

As an additional precaution, the actual berm's elevation at the west corner of the property was raised from 65.5 feet to 66.78 feet, running directly (from west to east) into the land measured at 67 feet on the north east corner of the property.

The total cost to implement the SEP was **$123,608.**

Spill Response Procedure

In addition to the berm, Fleischmann's has implemented a spill-response procedure to be executed in the event of a tank failure or leak. The two storm drain shutoff valves will be normally kept in the closed position. In case of an accumulation of liquid within the berm area, a determination will be made as to the nature of the material. If it is established that the liquid is rainwater and suitable to be discharged through the storm sewer; the appropriate shutoff valves will be opened and closed again after the water has been evacuated. If, on the other hand, it is established that the liquid is not only rain water, the material will remain contained and will be dealt with according to its nature.

Environmental Benefits of the SEP

This SEP will allow Fleischmann's and/or emergency responders to contain on-site any spills or releases of substances stored at the facility, and is expected to result in a decrease in the potential amount of any hazardous substance, pollutant or contaminant being released into the environment in the event of a spill or release of stored materials from the facility. Any releases of the liquid substances stored onsite are expected to be contained onsite at the facility, within the bermed area, and will prevent the release of hazardous substances, pollutants or contaminants to storm drains or the environment outside the facility boundaries. That will, in turn, increase emergency preparedness and response at the facility by enabling emergency responders to respond more quickly and efficiently in the event of a spill or release, and reduce the overall risk to the nearby residences and public health or the environment.

CERTIFICATION

By my signature below, Fleischmann's certifies that the SEP to which the EPA agreed in settlement of *In the Matter of Fleischmann's Vinegar Company, Inc., Sumner, Washington*, EPA Docket No. EPCRA-10-2014-0044 has been fully implemented pursuant to the provisions of the CAFO.

I certify under penalty of law that I have examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

FLEISCHMANN'S VINEGAR COMPANY, INC.

Sylvain Norton, Ph.D.
Vice President, Regulatory & Technology

Fleischmann's Vinegar

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