



THE QUALITY CHICKEN PEOPLE

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ALLEN FAMILY FOODS, INC.
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JAN 23 2006

DIV. OF WATER RESOURCES
SURFACE WATER DISCHARGES SECTION

January 18, 2006

Delaware Department of Natural Resources
And Environmental Control
Division of Water Resources
Surface Water Discharges Section
89 Kings Highway
Dover, DE 19903

Attn: Mr. Peder Hansen
Program Manager

Re: NPDES Permit No. DE 0000299
Allen Family Foods – Harbeson, DE

Subject: Comments NPDES Draft Permit

Dear Mr. Hansen,

The following comments in response to the referenced draft discharge permit prepared by John Sunda, Science Applications International Corporation (SAIC) are submitted on behalf of Allen Family Foods, Inc. (Allen's):

Draft Permit Comments

1. B.1 Effluent Limitations and Monitoring Requirements- We request that the flow daily average of 1.25 mgd be dropped from the permit. The daily maximum load limits would be the controlling factor; there is no need for a flow limit.
2. B.2 Effluent Limitations and Monitoring Requirements – We request that the effluent limitations for Outfall 002 and 003 be removed. The first flush at each of these outfalls is captured and pumped to the waste water system for treatment. This capture of first flush should satisfy compliance for Outfalls 002 and 003. We object to the daily maximum enterococcus of 185 col/100mL, as