



United States Environmental Protection Agency  
Washington, D.C. 20460

# Water Compliance Inspection Report

## Section A: National Data System Coding (i.e., PCS)

Transaction Code 1 <u>W</u> 2 <u>5</u> 3 <u>01E06060299</u> 11 <u>12</u> 12 <u>072620</u> 17	NPDES <u>01E06060299</u>	yr/mo/day <u>12 07 26 20</u>	Inspection Type 18 <u>S</u>	Inspector 19 <u>S</u>	Fac Type 20 <u>2</u>
Remarks					
21					
Inspection Work Days 67 <u>08 09</u> 69	Facility Self-Monitoring Evaluation Rating 70 <u>3</u>	BI 71 <u>F</u>	QA 72 <u>W</u>	Reserved	
73 74 75					

## Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) <u>ALLEN FAMILY FOODS</u> <u>P.O. Box 63</u> <u>HARBESON DE 19951</u>	Entry Time/Date <u>09:15</u> <u>11-20-07</u>	Permit Effective Date <u>5-1-06</u>
	Exit Time/Date <u>12:25</u> <u>11-20-07</u>	Permit Expiration Date <u>4-30-11</u>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <u>Tom BRINSON (ENV. MGR.)</u> <u>(302) 684-1640</u>	Other Facility Data (e.g., SIC NAICS, and other descriptive information)	
Name, Address of Responsible Official/Title/Phone and Fax Number <u>JOHN EVANS (PLANT MGR.)</u> <u>(302) 684-1640 EXT 126</u>	Contacted <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

## Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Self-Monitoring Program	<input checked="" type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

## Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
□□□□□□	_____
□□□□□□	_____
□□□□□□	_____
□□□□□□	_____

Name(s) and Signature(s) of Inspector(s) <u>Allen V. McCoskey</u>	Agency/Office/Phone and Fax Numbers <u>DNREC (302) 739-9946</u>	Date <u>11-20-07</u>
Signature of Management/QA Reviewer <u>[Signature]</u>	Agency/Office/Phone and Fax Numbers <u>DNREC (302) 739-9946</u>	Date <u>12/26/07</u>

Sections F thru L: Complete on all inspections, as appropriate. N/A = Not Applicable

PERMIT NO.  
**DE 0000299**

**SECTION F - Facility and Permit Background**

ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY (Including City, County and ZIP code)	DATE OF LAST PREVIOUS INVESTIGATION BY EPA/STATE
- Same -	11-20-06
FINDINGS	

**SECTION G - Records and Reports**

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.  YES  NO  N/A (Further explanation attached \_\_\_\_\_)

DETAILS:

(a) ADEQUATE RECORDS MAINTAINED OF:

(i) SAMPLING DATE, TIME, EXACT LOCATION <b>&amp; Person</b>	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
(ii) ANALYSES DATES, TIMES	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
(iii) INDIVIDUAL PERFORMING ANALYSIS	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
(iv) ANALYTICAL METHODS/TECHNIQUES USED	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
(v) ANALYTICAL RESULTS (e.g., consistent with self-monitoring report data)	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A

(b) MONITORING RECORDS (e.g., flow, pH, D.C., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS (e.g., continuous monitoring instrumentation, calibration and maintenance records).

YES  NO  N/A

(c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT.

YES  NO  N/A

(d) FACILITY OPERATING RECORDS KEPT INCLUDING OPERATING LOGS FOR EACH TREATMENT UNIT.

YES  NO  N/A

(e) QUALITY ASSURANCE RECORDS KEPT.

YES  NO  N/A

(f) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES (and their compliance status) USING PUBLICLY OWNED TREATMENT WORKS.

YES  NO  N/A

**SECTION H - Permit Verification**

INSPECTION OBSERVATIONS VERIFY THE PERMIT.  YES  NO  N/A (Further explanation attached \_\_\_\_\_)

DETAILS:

(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.

YES  NO  N/A

(b) FACILITY IS AS DESCRIBED IN PERMIT.

YES  NO  N/A

(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION.

YES  NO  N/A

(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION.

YES  NO  N/A

(e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES.

YES  NO  N/A

(f) ACCURATE RECORDS OF RAW WATER VOLUME MAINTAINED. **70PB**

YES  NO  N/A

(g) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT.

YES  NO  N/A

(h) CORRECT NAME AND LOCATION OF RECEIVING WATERS. **BEAYER DAM CREEK**

YES  NO  N/A

(i) ALL DISCHARGES ARE PERMITTED.

YES  NO  N/A

**SECTION I - Operation and Maintenance**

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.  YES  NO  N/A (Further explanation attached \_\_\_\_\_)

DETAILS:

(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED. **No Power/No Flow**

YES  NO  N/A

(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.

YES  NO  N/A

(c) REPORTS ON ALTERNATE SOURCE OF POWER SENT TO EPA/STATE AS REQUIRED BY PERMIT.

YES  NO  N/A

(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED. **SYNAGRO # OH 254**

YES  NO  N/A

(e) ALL TREATMENT UNITS IN SERVICE.

YES  NO  N/A

(f) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS. **JOHN REED**

YES  NO  N/A

(g) QUALIFIED OPERATING STAFF PROVIDED. **SEE 4.04**

YES  NO  N/A

(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS. **OST/DTEC**

YES  NO  N/A

(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS.

YES  NO  N/A

(j) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT.

YES  NO  N/A

(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED. **NEED PRINT-OUT w/sig.**

YES  NO  N/A

(l) SPPC PLAN AVAILABLE.

YES  NO  N/A

(m) REGULATORY AGENCY NOTIFIED OF BY PASSING. (Dates \_\_\_\_\_)

YES  NO  N/A

(n) ANY BY-PASSING SINCE LAST INSPECTION.

YES  NO  N/A

(o) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED.

YES  NO  N/A

PERMIT NO. \_\_\_\_\_

**SECTION J - Compliance Schedules**

PERMITTEE IS MEETING COMPLIANCE SCHEDULE.  YES  NO  N/A (Further explanation attached \_\_\_\_\_)

CHECK APPROPRIATE PHASE(S):

- (a) THE PERMITTEE HAS OBTAINED THE NECESSARY APPROVALS FROM THE APPROPRIATE AUTHORITIES TO BEGIN CONSTRUCTION.
- (b) PROPER ARRANGEMENT HAS BEEN MADE FOR FINANCING (mortgage commitments, grants, etc.).
- (c) CONTRACTS FOR ENGINEERING SERVICES HAVE BEEN EXECUTED.
- (d) DESIGN PLANS AND SPECIFICATIONS HAVE BEEN COMPLETED.
- (e) CONSTRUCTION HAS COMMENCED.
- (f) CONSTRUCTION AND/OR EQUIPMENT ACQUISITION IS ON SCHEDULE.
- (g) CONSTRUCTION HAS BEEN COMPLETED.
- (h) START-UP HAS COMMENCED.
- (i) THE PERMITTEE HAS REQUESTED AN EXTENSION OF TIME.

**SECTION K - Self-Monitoring Program**

**Part 1 -- Flow measurement** (Further explanation attached \_\_\_\_\_)

PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT.  YES  NO  N/A

- DETAILS:
- (a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED.  YES  NO  N/A  
TYPE OF DEVICE:  WEIR  PARSHALL FLUME  MAGMETER  VENTURI METER  OTHER (Specify \_\_\_\_\_)
  - (b) CALIBRATION FREQUENCY ADEQUATE. (Date of last calibration 8-28-07)  YES  NO  N/A
  - (c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED.  YES  NO  N/A
  - (d) SECONDARY INSTRUMENTS (totalizers, recorders, etc.) PROPERLY OPERATED AND MAINTAINED.  YES  NO  N/A
  - (e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOW RATES.  YES  NO  N/A

**Part 2 -- Sampling** (Further explanation attached \_\_\_\_\_)

PERMITTEE SAMPLING MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT.  YES  NO  N/A

- DETAILS:
- (a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.  YES  NO  N/A
  - (b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT.  YES  NO  N/A
  - (c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT.  YES  NO  N/A  
IF NO,  GRAB  MANUAL COMPOSITE  AUTOMATIC COMPOSITE FREQUENCY \_\_\_\_\_
  - (d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE.  YES  NO  N/A
    - (i) SAMPLES REFRIGERATED DURING COMPOSITING ICE  YES  NO  N/A
    - (ii) PROPER PRESERVATION TECHNIQUES USED  YES  NO  N/A
    - (iii) FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT  YES  NO  N/A
    - (iv) SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40 CFR 136.3  YES  NO  N/A
  - (e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT.  YES  NO  N/A
  - (f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT.  YES  NO  N/A

**Part 3 -- Laboratory** (Further explanation attached \_\_\_\_\_)

PERMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS AND INTENT OF THE PERMIT.  YES  NO  N/A

- DETAILS:
- (a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED. (40 CFR 136.3)  YES  NO  N/A
  - (b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED.  YES  NO  N/A
  - (c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED.  YES  NO  N/A
  - (d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.  YES  NO  N/A
  - (e) QUALITY CONTROL PROCEDURES USED.  YES  NO  N/A
  - (f) DUPLICATE SAMPLES ARE ANALYZED. 25 % OF TIME.  YES  NO  N/A
  - (g) SPIKED SAMPLES ARE USED. 100 % OF TIME.  YES  NO  N/A
  - (h) COMMERCIAL LABORATORY USED.  YES  NO  N/A
  - (i) COMMERCIAL LABORATORY STATE CERTIFIED.  YES  NO  N/A

LAB NAME ENVIRO CORP LABS  
LAB ADDRESS 51 CLARK ST. HARRINGTON, DE 19952

PERMIT NO.  
**DE 0000 299**

**SECTION L - Effluent/Receiving Water Observations** (Further explanation attached \_\_\_\_\_)

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOL	COLOR	OTHER
001	No	No	No	* YES	No	CLEAR	-

(Sections M and N: Complete as appropriate for sampling inspections)

**SECTION M - Sampling Inspection Procedures and Observations** (Further explanation attached \_\_\_\_\_)

- GRAB SAMPLES OBTAINED
- COMPOSITE OBTAINED
- FLOW PROPORTIONED SAMPLE
- AUTOMATIC SAMPLER USED
- SAMPLE SPLIT WITH PERMITTEE
- CHAIN OF CUSTODY EMPLOYED
- SAMPLE OBTAINED FROM FACILITY SAMPLING DEVICE

COMPOSITING FREQUENCY 24 hr. PRESERVATION ICED

SAMPLE REFRIGERATED DURING COMPOSITING:  YES  NO

SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE MUNICIPAL

**SECTION N - Analytical Results** (Attach report if necessary)

\* Approx. 150' x 50' of down stream foam!



HORNEY INDUSTRIAL ELECTRONICS

*Process Control Technology*

## CERTIFICATE OF CALIBRATION

Date : August 28, 2007

Allen Family Foods  
Rt 5 P.O. Box 63  
Harbeson DE 19951

Purchase Order: 4500020736

Job: 603016

**Manfg.**

Oakton pH510 Series  
E&H FMU 861  
H/W Trueline DR45AT

**Serial#**

283911  
XSR0070EP03  
9850Y839479500002

**Range**

0-14 pH  
0-1200 GPM  
Pen 1 - 0-1200 GPM  
Pen 2 - 0-14 pH  
0-14 pH

Signet 3-8750-1P

60412162940

ALL CALIBRATION TRACEABLE TO N.I.S.T. AS PER MANFG. SPECIFICATION



51 Clark St. Harrington, DE 19952

PH: 302.398.4313 -- FX: 302.398.4312

ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

08/17/07

Allen Family Foods  
P.O. Box 63  
Harbeson, DE 19951

Attention: Mr. Michael Sause

Lab I.D.                      Description  
36380T                      TCLP Extraction of 36380W

<u>Parameter</u>	<u>Units</u>	<u>Results</u>	<u>Test Date</u>	<u>Time</u>	<u>Init</u>	<u>Method</u>
** Arsenic	mg/L	< 0.0080	07/11/07	1238	HJG3	200.9
** Barium	mg/L	< 1	08/14/07	1055	HJG3	3111B
** Cadmium	mg/L	0.0016	07/17/07	1658	HJG3	200.9
** Chromium	mg/L	0.0028	07/18/07	1426	HJG3	200.9
** Lead	mg/L	< 0.0080	07/25/07	1414	HJG3	200.9
** Mercury	mg/L	< 0.0020	07/18/07	1600	HJG	245.1
** Selenium	mg/L	< 0.0080	07/11/07	1646	HJG3	200.9
** Silver	mg/L	0.0048	07/24/07	1643	HJG3	200.9
** A spiked duplicate sample yielded		99.70%	recovery			
** A spiked duplicate sample yielded		81.00%	recovery			
** A spiked duplicate sample yielded		86.30%	recovery			
** A spiked duplicate sample yielded		100.20%	recovery			
** A spiked duplicate sample yielded		85.00%	recovery			
** A spiked duplicate sample yielded		111.10%	recovery			
** A spiked duplicate sample yielded		109.60%	recovery			
** A spiked duplicate sample yielded		98.00%	recovery			

  
Supervising Analyst





51 Clark St. Harrington, DE 19952

PH: 302.398.4313 FX: 302.398.4312

ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

08/17/07

Allen Family Foods  
P.O. Box 63  
Harbeson, DE 19951

Attention: Mr. Michael Sause

Lab I.D.

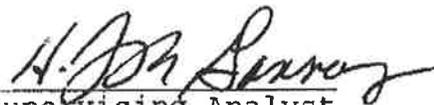
Description

36380A

Sludge grab @ 0700-hrs on 6/27/07 by client;  
received 6/27/07 by RON of EI (Dry Weight)

<u>Parameter</u>	<u>Units</u>	<u>Results</u>	<u>Test Date</u>	<u>Time</u>	<u>Init</u>	<u>Method</u>
Total Nitrogen as N	%	7.44	06/29/07	1600	EHK	CALC
TKN	%	7.44	06/29/07	1308	EHK	351.2
Nitrate+Nitrite as N	%	< 0.0009	06/29/07	1046	EHK	353.1
Organic Nitrogen as N	%	7.40	06/29/07	1600	EHK	CALC
Ammonia as N	%	0.040	06/29/07	1202	EHK	350.1
Total Phosphorus as P	%	4.51	06/29/07	1500	EHK	365.1
Potassium	mg/kg	4200	08/08/07	1228	HJG3	3111B
Cadmium	mg/kg	0.4600	08/15/07	1825	HJG3	200.9
Lead	mg/kg	3.10	08/14/07	1241	HJG3	3111B
** Mercury	mg/kg	< 0.5000	07/02/07	800	HJG	245.5
Zinc	mg/kg	335	08/03/07	1721	HJG3	3111B
Arsenic	mg/kg	5.60	08/03/07	1642	HJG3	200.9
Nickel	mg/kg	14	08/01/07	1828	HJG3	200.9
Selenium	mg/kg	3.80	08/07/07	1336	HJG3	200.9
Molybdenum	mg/kg	< 2	08/14/07	1804	HJG3	200.9
Copper	mg/kg	35.0	08/01/07	1305	HJG3	3111B

\*\* A spiked duplicate sample yielded 90.50% recovery

  
Supervising Analyst





51 Clark St. Harrington, DE 19952

PH: 302.398.4313 FX: 302.398.4312

ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

08/17/07

Allen Family Foods  
P.O. Box 63  
Harbeson, DE 19951

Attention: Mr. Michael Sause

Lab I.D.

Description

36380W

Sludge Grab @ 0700-hrs on 06/27/07 by client;  
received 06/27/07 by RON of EI (As Received)

<u>Parameter</u>	<u>Units</u>	<u>Results</u>	<u>Test Date</u>	<u>Time</u>	<u>Init</u>	<u>Method</u>
Total Nitrogen as N	%	0.838	06/29/07	1600	EHK	CALC
TKN	%	0.838	06/29/07	1308	EHK	351.2
** Nitrate+Nitrite as N	%	< 0.0001	06/29/07	1046	EHK	353.1
Organic Nitrogen as N	%	0.834	06/29/07	1600	EHK	CALC
** Ammonia as N	%	0.005	06/29/07	1202	EHK	350.1
Total Phosphorus as P	%	0.508	06/29/07	1500	EHK	365.1
Solids	%	11.27	07/05/07	1100	HJG	160.3
pH	S.U.	6.50	07/12/07	1635	GSH	150.1

\*\* A spiked duplicate sample yielded 99.20% recovery

\*\* A spiked duplicate sample yielded 98.60% recovery

  
Supervising Analyst



# Allen Family Foods, Inc.

Allen Family Foods, Inc.

Phone:  
FAX:  
email:

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August 21, 2007

Mr. Allen McCloskey  
Department of Natural Resources & Environmental Control  
Division of Water Resources  
89 Kings Highway  
Dover, Delaware 19901

RE: Section 4.04 Report

Dear Mr. McCloskey:

Please be advised that Christopher Brinson has joined the Allen's Harbeson wastewater treatment facility staff as a Wastewater Operator effective August 13, 2007.

I have enclosed an updated Section 4.04 report with a staffing plan. In that plan I have designated my shift operators as having Direct Responsible Charge (DRC) for their respective shifts and laboratory.

If you should have any questions, please let me know.

Respectfully submitted,  
ALLEN FAMILY FOODS, INC.



Michael R. Sause  
Wastewater Manager

Attachments



STATE OF DELAWARE  
 DEPARTMENT OF NATURAL RESOURCES  
 & ENVIRONMENTAL CONTROL  
 DIVISION OF WATER RESOURCES

Surface Water Discharges Section

89 KINGS HIGHWAY  
 DOVER, DELAWARE 19901

Phone: (302) 739-9946  
 Fax: (302) 739-8369

SECTION 4.04 REPORT

NAME OF WASTEWATER TREATMENT FACILITY:

Allen's Wastewater Treatment Facility

ADDRESS OF WASTEWATER TREATMENT FACILITY:

18752 Harbeson Road P.O. Box 63  
Harbeson, Delaware 19951

NAME OF OWNER:

Allen Family Foods, Inc.

ADDRESS OF OWNER:

126 N. Shipley Street  
Seaford, DE 19973

TYPE OF PLANT OR TYPE OF UNIT PROCESSES OPERATED:

Anoxic Ponds, Complete Mix Activated Sludge, Clarification, Chlorination, Dechlorination Digesters, DAF, Belt Filter Press

PLANT SIZE: DESIGN FLOW:

1.25

MGD

AVERAGE DAILY FLOW:

1.18

MGD

(July, 2007)

OPERATORS IN DIRECT RESPONSIBLE CHARGE:

NAME:

Michael Sausé

AREAS OF PLANT RESPONSIBILITY:

Entire Plant

OTHER OPERATORS:

NAME:

see attached sheet

AREAS OF PLANT RESPONSIBILITY:

8-21-07  
 Date

Michael R. Sausé  
 Responsible Official

*Delaware's good nature depends on you!*

## HARBESON WASTEWATER PLANT STAFFING

<b>Name</b>	<b>Title</b>	<b>Certification Level</b>
Michael Sausé	Wastewater Manager (DRC Entire Plant)	DE Level 4
Thomas Paine	Wastewater Operator / Assistant Supervisor (DRC Entire Plant)	DE Level 2 (OIT)
Jeffrey Bailey	Wastewater Operator / Line Leader 2 <sup>nd</sup> shift (DRC)	DE Level 2
James Comer	Wastewater Operator 3 <sup>rd</sup> Shift (DRC)	DE Level 2 (OIT)
Nancy Kraus	Wastewater Operator / Laboratory (DRC)	DE Level 1 (OIT)
Christopher Brinson	Wastewater Operator	DE Level 1
Tom Brinson	Allen's Corporate Support	DE Level 4

### **Areas of Responsibility**

As Wastewater Manager Michael Sausé currently has Direct Responsible Charge (DRC) and overall management responsibility of the Harbeson Wastewater Treatment Facility. Tom Brinson provides technical support and DE Level 4 coverage when necessary.

The operators cover three shifts to oversee the operations and maintenance of the Harbeson wastewater facility to ensure permit compliance with discharge requirements. DRC status should be considered as noted above due to the level of responsibility on the shifts that each operator is responsible for. Processes include dissolved air flotation thickener, anoxic lagoons, complete mixed activated sludge, final clarification, chlorination, dechlorination, sludge digestion and belt filter press. Duties include, but are not limited to, operation of equipment, operation checks, process control checks, minor preventive and corrective maintenance, process laboratory testing, housekeeping, etc .



STATE OF DELAWARE  
DEPARTMENT OF NATURAL RESOURCES AND  
ENVIRONMENTAL CONTROL  
DIVISION OF WATER RESOURCES  
89 KINGS HIGHWAY  
DOVER, DELAWARE 19901

ENVIRONMENTAL  
LABORATORY SECTION

PHONE: (302) 739-9942  
FAX: (302) 739-3491

December 21, 2007

J. Chris Cleaver  
DWR - Surface Water Discharge Section - NPDES  
89 Kings Highway  
Dover, DE 19901

Attention: J. Chris Cleaver

Attached you will find the following Laboratory Results:

**Order Number:** 0711039  
**Project Description:** Allen Family Foods  
**Date Received:** 11/20/2007  
**Time Received:** 14:00

If you have any questions regarding this data, please contact me at the above telephone number.

Sincerely,

Kathy A. Knowles  
Laboratory Manager

*Delaware's good nature depends on you!*



## Qualifier Codes, Definitions, and Abbreviations

### Qualifier/Flag

<	Sample value is below the method detection limit. The result is reported as < MDL.
>	Sample value is above the upper quantitation limit. The upper quantitation limit is reported.
AB	Air Bubble in DO bottle
B	Compound not detected substantially (10 times) above the level reported in the laboratory blanks (For Chlorophyll & Pheophytin, blank value is at or below amount detected in sample).
BT	Secchi disk ON BOTTOM. The reported result is the depth from the surface to the bottom.
C	See report narrative or comment line for observations concerning this result.
D	Sample diluted for analysis.
EG	Value exceeds a theoretically equivalent or greater value (e.g. dissolved > total).
EW	Value exceeds a theoretically equal or greater value (e.g. dissolved > total). However, the difference is within the expected precision of the analytical techniques and is not statistically significant.
FZ	Samples frozen prior to analysis
I	The reported value is estimated due to the presence of interference.
IM	Instrument malfunctioned; No measurement taken.
J	Analyte present; reported value is estimated; concentration is below the range for accurate quantitation (greater than the MDL, but less than the LOQ).
JH	Result is likely overestimated due to matrix effect.
JL	Result is likely underestimated due to matrix effect
K	Sample not analyzed for the dissolved metal. The Total metal result is below the lower quantitation limit.
LOQ	Limit of Quantitation
MDL	Method Detection Limit
NA	Not Analyzed but required by project workplan or analytical request form.
NBF	No bottom measurement recorded in the field due to shallow water; Bottom records are those measurements recorded at surface.
NC	Sample not collected, but required by the project work plan.
ND	Not Detected.
NE	Field measurement not taken due to uncontrollable field sampling event or Natural Condition (Depth of water too deep/shallow).
NF	Sample collected, but not analyzed by the laboratory due to field error.
NO	None Observed
NR	No Result. See report narrative or comments for explanation.
NV#	Analytical result not valid.
O	Sample outsourced for analysis. Data will be reported separately.
P	Sample not properly preserved in field in accordance with preservation requirements. Data may be suspect.
PMM	Par Meter Malfunction
QC	Quality control value is outside acceptance limits.
QNS	Quantity not sufficient. Not enough sample to perform requested analyses.
S	Results will be reported in a separate report; See attached report.
SD	Sample discarded; Sample collected but not analyzed as per client request.
SNF	Site has no flow (i.e. a dry stream or a stream with no velocity)
STD	Stream too deep
STS	Site is too shallow to sample
U	Compound was analyzed but not detected. The method detection limit is reported.
UR	Nothing unusual was noted during the analysis of this sample. However, the test result differs from the norm to an extent that the laboratory considers it unreliable.
V	Analysis performed after holding time expired.
X	Results were not available at the time of the release of the report. Results will be reported when available.





Environmental Laboratory Section - Division of Water Resources  
Delaware Department of Natural Resources and Environmental Control  
89 Kings Highway, Dover, DE 19901 Phone: 302-739-9942

# INVOICE

**Invoice To:**

J. Chris Cleaver  
DWR - Surface Water Discharge Section - NPDES  
89 Kings Highway  
Dover, DE 19901

**Report To:**

J. Chris Cleaver  
DWR - Surface Water Discharge Section - NPDE  
89 Kings Highway  
Dover, DE 19901

Invoice ID:	Account:	ELS Contact:	Invoice Date:	Priority:
IN3059	DWR-NPDES	Donna.Faries	21-Dec-07	Normal

Order ID:	Project Name:	Date Received:
0711039	Allen Family Foods	20-Nov-07

Matrix:	Description:	Quantity:	Unit Price:	Extended Price:
Waste Water	Residue, Nonfilterable (TSS)	1	\$11.00	\$11.00
Waste Water	Phosphorus, Total, Alkaline Persulfate	1	\$20.00	\$20.00
Waste Water	Oil & Grease N-Hexane Extractable Mat	1	\$42.00	\$42.00
Waste Water	Nitrogen, Total, Alkaline Persulfate	1	\$20.00	\$20.00
Waste Water	Enterococcus	1	\$25.00	\$25.00
Waste Water	BOD, 5-Day (Seeded)	1	\$24.00	\$24.00
Waste Water	Ammonia as N, Total	1	\$19.00	\$19.00

Thank you for allowing us to serve you

**Total:** \$161.00



STATE OF DELAWARE  
DEPARTMENT OF NATURAL RESOURCES &  
ENVIRONMENTAL CONTROL  
DIVISION OF WATER RESOURCES  
89 KINGS HIGHWAY  
DOVER, DELAWARE 19901

Surface Water Discharges Section

Phone: 302-739-9946  
Fax: 302-739-8369

November 30, 2007

Allen's Family Foods, Inc.  
Mr. Tom Brinson  
P.O. Box 63  
Harbeson, DE 19951

Re: Compliance Sampling & Inspection Sampling (CSI) – November 20, 2007  
NPDES Permit No. DE-0000299

Dear Mr. Brinson:

On behalf of the State of Delaware, Surface Water Discharges Section, Compliance Branch, I would first like to thank you, Mr. Tom Paine, Ms. Nancy Kraus, and your associates for the cooperation and assistance during the Compliance Sampling & Inspection (CSI) completed at your facility on November 20, 2007.

Laboratory records, reagents, instrumentation, and methods were reviewed for conformance to NPDES requirements, and were found to be in accordance with these requirements. Ms. Kraus was very cooperative and knowledgeable. Overall WWTP operation, plant housekeeping, and solids handling were very good and your operators were very cooperative, very helpful, and very knowledgeable as well. During this CSI, we found one (1) observable major deficiency/violation and several minor deficiencies and observations/recommendations. I would like to commend everyone at Allen's Family Foods, Inc. for their efforts.

There was one (1) Major Deficiency/Violation noted during the inspection, as follows:

- When we arrived at the chlorine contact area, we noticed that there was a lot of foam floating throughout approximately 30 of the contact channel area, with a water spray containing it from exiting the parshall flume and out to 001. At that time, we did not observe any foam leaving the contact chamber, but explained that we were very uncomfortable with the potential for the

*Delaware's good nature depends on you!*

water spray pump to malfunction and the foam to leave the plant. This situation must be corrected to avoid any potential violations of your NPDES Permit. We then proceeded to the areas of your 001 discharge, where we observed some residual foam accumulating by the edge of the creek. Upon walking further downstream, we found additional foam accumulated in a leaf/branch jam in the creek approximately 100 – 150 feet downstream of the 001 Outfall. We continued to walk the creek for several hundred feet but did not notice any additional foam accumulation in the creek. Allen's Family Foods personnel immediately contacted CDI to come to the plant with a vac truck and to clean up all of the foam that was present around and downstream of your 001 Outfall. This cleanup effort was subsequently documented to DNREC, with a report that there was no adverse impact to the environment. Additionally, DNREC personnel also noted that there was no apparent adverse impact to the environment, as a result of foam leaving your 001 Outfall.

The foaming situation at the chlorine contact channels and the potential for additional violations of foam discharge must be corrected immediately.

There were several minor deficiencies (**MD**) and observations/recommendations (**R**) noted during the inspection, as follows:

- During the Storm Water Pollution Prevention part of the inspection, it was observed that none of the storm water outfalls were identified with proper signage; all Outfalls must be properly identified (**MD**).
- Outfall 003 had excessive accumulation of leaves on top of the catch-basin grate, that could prevent any storm water from entering the catch-basin and could divert the flow overland. Additionally, one small area of the grate was missing and could allow small animals to enter the catch-basin and be potentially pulled into the pump (this situation occurred several months ago) (**MD**).
- During routine discussions, it was discovered that the discharge to 001 Outfall is not diverted when the operators are cleaning the chlorine contact channels or when they are skimming the surface. Since your system does have provisions for recycling (diverting the 001 flow), it is recommended that you recycle 001 flow during any cleaning or skimming operations (**R**).
- The automatic composite samplers (ISCO) aliquot volumes are not verified. Aliquot volumes must be verified on a routine (suggest monthly) basis and documented on an appropriate form (**MD**).
- While inspecting the "Holding Area" it was observed that one of the sump pumps that collects accumulated water in the holding area shed was malfunctioning and that water was backing up in the shed. Recovery and treatment of this collected contaminated water is an essential part of compliance to the Storm Water Pollution Prevention. Procedures must be in place to insure that any accumulated contaminated water is pumped out of the holding shed and put into the wastewater treatment system (**MD**).

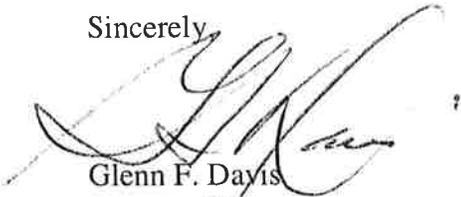
Allen's Family Foods, Inc.  
CSI – November 20, 2007  
Page Three

- A part of any comprehensive Storm Water Pollution Prevention Plan is the orderly and proper collection of any contaminated storm water found in any part of the facility. It is quite obvious that Allen's Family Foods, Inc. has completed some very comprehensive projects to improve storm water runoff and collection in the front of the plant site, but the back areas continue to be in very bad shape. In order to manage storm water properly, the back areas of the facility in and around the holding area and WWTP need to be evaluated for proper storm water management, and steps taken to get the impacted areas properly landscaped and covered (black-topped) (MD)(R).

Please send your formal response, including any corrective/preventative actions to the above noted deficiencies and recommendations, by no later than 30 days after receiving this letter.

I would again like to thank you, Mr. Tom Paine, Ms. Nancy Kraus, and all or your associates, for the cooperation and participation in this Compliance Sampling Inspection program to help assure the continued quality of our NPDES effluent waters and the self-reporting data. If you have any questions, please contact Mr. Allen McCloskey or me at 302-739-9946.

Sincerely,



Glenn F. Davis  
Program Manager  
Compliance Branch  
Surface Water Discharges Section  
State of Delaware – DNREC

ecopy: Mr. Peder Hansen - DNREC  
Mr. Allen McCloskey – DNREC



THE QUALITY CHICKEN PEOPLE

ALLEN FAMILY FOODS, INC.  
274 NEALSON STREET  
P.O. BOX 1030  
HURLOCK, MD 21643  
410/943-3989 FAX: 410/943-0174



December 20, 2007

Glenn Davis  
State of Delaware- DNREC  
Compliance Branch  
Surface water Discharges Section

SENT VIA CERTIFIED MAIL

Re: **NPDES Permit No. DE-0000299**  
**November 20, 2007, CSI**

Dear Mr. Davis:

The following comments in response to your letter dated November 30, 2007, are submitted on behalf of Allen Family Foods, Inc. (Allen's):

According to your letter there was 1 Major Deficiency:

*"When we arrived at the chlorine contact area, we noticed that there was a lot of foam floating throughout approximately 30 of the contact channel area, with a water spray containing it from exiting the parshall flume and out to 001. At that time, we did not observe any foam leaving the contact chamber, but explained that we were very uncomfortable with the potential for the water spray pump to malfunction and the foam to leave the plant. This situation must be corrected to avoid any potential violations of your NPDES Permit. We then proceeded to the areas of your 001 discharge, where we observed some residual foam accumulating by the edge of the creek. Upon walking further downstream, we found additional foam accumulated in a leaf/branch jam in the creek approximately 100 – 150 feet downstream of the 001 Outfall. We continued to walk the creek for several hundred feet but did not notice any additional foam accumulation in the creek. Allen's Family Foods personnel immediately contacted CDI to come to the plant with a vac truck and to clean up all of the foam that was present around and downstream of your 001 Outfall. This cleanup effort was subsequently documented to DNREC, with a report that there was no adverse impact to the environment. Additionally, DNREC personnel also noted that there was no apparent adverse impact to the environment, as a result of foam leaving your 001 Outfall.*

*The foaming situation at the chlorine contact channels and the potential for additional violations of foam discharge must be corrected immediately."*

For the short term, as indicated in your letter, Allen's immediately had CDI come to the facility to address the immediate issue. For the long term, parts have been ordered for the installation of an alarm system on the spray bar pump. The system will be installed after all parts arrive. In the meantime, the operators will make visual inspections of the spray bar system on their rounds. We

are investigating the possibility of installing a baffle in the chlorine contact chamber to stop foam from exiting the contact chamber.

The following were the minor Deficiencies noted in your letter:

*“During the Storm Water Pollution Prevention part of the inspection, it was observed that none of the storm water outfalls were identified with proper signage; all Outfalls must be properly identified (MD).”*

Allen's has tried a number of different ways to label the stormwater outfalls. Stormwater Outfalls 002, 003 and 004 have been identified and marked appropriately with an in-house label, and a new type of label for each outfall has been ordered.

*“Outfall 003 had excessive accumulation of leaves on top of the catch-basin grate that could prevent any storm water from entering the catch-basin and could divert the flow overland. Additionally, one small area of the grate was missing and could allow small animals to enter the catch-basin and be potentially pulled into the pump (this situation occurred several months ago) (MD).”*

Allen's had CDI onsite on 11-26-07 to pump all stormwater sumps and holding shed sumps. All leaves were removed from both sumps at SW002 and SW003 on 11-26-07.

*“During routine discussions, it was discovered that the discharge to 001 Outfall is not diverted when the operators are cleaning the chlorine contact channels or when they are skimming the surface. Since your system does have provisions for recycling (diverting the 001 flow), it is recommended that you recycle 001 flow during any cleaning or skimming operations (R).”*

Allen's has written and initiated a Standard Operating Procedure (SOP) that all flow will be diverted for recycle during future skimming and cleaning of the contact chamber. All affected personnel have been trained in this SOP.

*“The automatic composite samplers (ISCO) aliquot volumes are not verified. Aliquot volumes must be verified on a routine (suggest monthly) basis and documented on an appropriate form (MD).”*

Allen's has written a Standard Operating Procedure (SOP) that Automatic Composite Sampler aliquot volumes will be verified and calibrated. This will be implemented by the wastewater staff and documented. All affected personnel have been trained in this SOP.

*“While inspecting the “Holding Area” it was observed that one of the sump pumps that collects accumulated water in the holding area shed was malfunctioning and that water was backing up in the shed. Recovery and treatment of this collected contaminated water is an essential part of compliance to the Storm Water Pollution Prevention. Procedures must be in place to insure that any accumulated contaminated water is pumped out of the holding shed and put into the wastewater treatment system (MD).”*

Allen's had CDI on site on 11-26-07 to pump holding shed sumps. Visual inspections of the stormwater and holding shed sump pumps will be done by operators on their rounds.

*"A part of any comprehensive Storm Water Pollution Prevention Plan is the orderly and proper collection of any contaminated storm water found in any part of the facility. It is quite obvious that Allen's Family Foods, Inc. has completed some very comprehensive projects to improve storm water runoff and collection in the front of the plant site, but the back areas continue to be in very bad shape. In order to manage storm water property, the back areas of the facility in and around the holding area and WWTP need to be evaluated for proper storm water management, and steps taken to get the impacted areas properly landscaped and covered (black-topped) (MD)(R)."*

Allen's appreciates your observation of our commitment and our efforts in improving stormwater runoff and collection, especially in the front of our plant. Allen's continues to evaluate and implement ways to make improvements in stormwater management, as reflected in the installation of the drains in the holding area. This area is now piped to wastewater. Also, as you observed, this area is no longer used for outdoor storage. The Pollution Prevention Team meets regularly to review issues, findings of inspection and evaluate ways to continue to improve our SPPP.

Sincerely,  
Allen Family Foods, Inc.



Thomas Brinson  
Environmental Manager

cc: Mike Sause, Allen's Harbeson