



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

PERMIT NO.  
**DE 000299**

**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  
**10-14-09**

FINDINGS

**SEE ATTACHED LETTER**

**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  YES  NO  N/A
- (ii) ANALYSES DATES, TIMES  YES  NO  N/A
- (iii) INDIVIDUAL PERFORMING ANALYSIS  YES  NO  N/A
- (iv) ANALYTICAL METHODS/TECHNIQUES USED  YES  NO  N/A
- (v) ANALYTICAL RESULTS (e.g., consistent with self-monitoring report data)  YES  NO  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.  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. **BEAVER 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.  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 ENGR. E IN-14005**  YES  NO  N/A

(g) QUALIFIED OPERATING STAFF PROVIDED. **IV(2), II(1), II(2), II(4)**  YES  NO  N/A

(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS. **OST-DIAR**  YES  NO  N/A

(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS. **ETMS BEARING USED**  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. **NEEDS REVISID**  YES  NO  N/A

(l) SPCC 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. DE 000299

**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. ULTRA-SONIC  YES  NO  N/A  
TYPE OF DEVICE:  WEIR  PARSHALL FLUME  MAGMETER  VENTURI METER  OTHER (Specify \_\_\_\_\_)
- (b) CALIBRATION FREQUENCY ADEQUATE. (Date of last calibration 08/10)  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 ICE  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. EXCEPT PHETAC  YES  NO  N/A
- (g) SPIKED SAMPLES ARE USED. 25 % 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

HARRINGTON, DE

PERMIT NO.  
*DE 0000299*

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

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOL	COLOR	OTHER
<i>001</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>CLEAR</i>	<i>—</i>
<i>002</i>	<i>} NO FLOW</i>						
<i>003</i>							
<i>004</i>							

(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 *Flow Prop.* PRESERVATION *ICE*

SAMPLE REFRIGERATED DURING COMPOSITING:  YES  NO *ICE!*

SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE *YES*

SECTION N - Analytical Results (Attach report if necessary)

*SAMPLING W/ED 5/4/11*



**WATER COMPLIANCE INSPECTION REPORT  
STORM WATER EVALUATION**  
National Pollutant Discharge Elimination System Permitting Program  
Delaware Department of Natural Resources and Environmental Control  
Surface Water Discharges Section

Name and location of Facility Inspected <i>ALLAN'S FAMILY FOODS, INC.</i>	Entry Date/Time <i>4-27-11</i>
Facility Permit No. <i>DE 0000299</i>	Exit Date/Time <i>4-27-11</i>
Facility Contact <i>MICHAEL SAUSE</i>	

An evaluation of the facility's storm water management program was completed in order to determine whether or not the facility is operating in compliance with regards to the storm water permitting requirements of their NPDES permit. The evaluation consisted of a records review and a visual observation of the facility's storm water management system.

The facility is permitted to discharge storm water from Outfall(s) \_\_\_\_\_.

RECORDS REVIEW		Yes	No	S/C
1) Storm Water Plan. Has the facility developed and implemented a Storm Water Plan as required by Part III of their NPDES Permit? What is the date of the current SWP? <i>MARCH 2006</i>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Training. Training completed annually? Are all employees and contractor personnel that work in areas where industrial materials are used/stored trained to meet the requirements of the SWP?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3) Inspection Records. Are storm water inspections conducted and documented? Please describe.		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4) Monitoring Data. Has the facility performed storm water monitoring as required by the permit?		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5) Spill and Leaks. Have any major spills or leaks occurred resulting in a discharge to the storm water conveyance system? If so, are records maintained indicating spills/leaks?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>N/A</i>

PHYSICAL INSPECTION		Yes	No	S/C
1) Storm Water Outfalls. Are storm water outfalls identified as required?		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Outfalls free of trash/ debris/erosion?		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Any non-storm water discharges occurring?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Storm Water Conveyance System. Are catch basins, storm water conveyance systems and storm water treatment facilities cleaned at appropriate intervals? Is the storm water conveyance system free of trash and debris?		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) Good Housekeeping Practices. Are outside areas kept neat and clean? Is process debris removed regularly?		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is there evidence of leaks/spills?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is there evidence of particulate matter or visible deposits and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water discharge?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4) Storm Water Pollution: materials being stored in a manner that minimizes their exposure to storm water?		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5) Storm Water Visual Observations: Are the following present in storm water discharges or do the outfalls indicate evidence thereof?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

OUTFALL NUMBER	OIL SHEEN	VISIBLE FOAM	VISIBLE FLOATING SOLIDS	COLOR
<i>002, 003, 004</i>	<i>NO</i>	<i>DISCHARGE</i>		
		<i>= CLEAN =</i>		

**COMMENTS**

*SWP needs to be updated - Training needs to be completed*

Compliance Status At Time of Inspection: *non-compliance*

Reconnaissance Inspection Required: Yes or No  If Yes, an Inspection shall be completed within 1 months.

Inspector's Printed Name: *Stacy Davis*

Inspector's Signature: *[Signature]* Date: *4-27-11*



HORNEY INDUSTRIAL ELECTRONICS

*Process Control Technology*

## CERTIFICATE OF CALIBRATION

Date : August 5, 2010

Allen Family Foods  
18752 Harbeson Rd.  
Harbeson DE 19951

Purchase Order: 4500072742

Job: 60190

**Manfg.**

Oakton pH510 Series  
H/W Trueline DR45AT  
Siemens Hydro Ranger 200

**Serial#**

283911  
9850Y839479500002  
PBD/X6170038

**Range**

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

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

  
\_\_\_\_\_

**Allen Family  
Foods, Inc.**

Allen Family Foods, Inc.

Phone:  
FAX:  
email:

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**FAX TRANSMITTAL**

To: Glenn Davis

Fax. No. 302-739-8369

From: Michael Sause

Date: May 3, 2011

Subject: pH and Chlorine Residual Data - April, 2011

Pages: 2 with cover

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Glenn,

The following pH and chlorine residual data sheet for April, 2011 will show that a second duplicate sample was run by myself on April 29, 2011. Two duplicate samples will be run on all months going forward.

Thanks,  
Michael Sause  
Wastewater Manager

Apr-11

METER CALIBRATION LOG  
pH METER

CHL METER

DATE	TIME	pH 4.01	pH 7.00	pH 10.01	pH	Temp	0.00	Cl2	INITS	
4-1-11	01:00	4.01	7.00	10.01	6.67	16.7	0.00	ND	RS	1.78
4 DUP 1-11	01:05	4.01	7.00	10.01	6.73	16.7	0.00	ND	RS	1.47
4-3-11	05:35	4.01	7.00	10.01	6.79	16.3	0.00	ND	RS	1.89
4-4-11	5:40	4.01	7.00	10.01	6.89	17.3	0.00	ND	RS	1.71
4-5-11	5:35	4.01	7.00	10.01	6.89	17.3	0.00	ND	RS	1.80
4-6-11	3:15	4.01	7.00	10.01	6.87	16.3	0.00	ND	RS	1.61
4-7-11	2:50	4.01	7.00	10.01	6.77	16.6	0.00	ND	RS	1.87
4-8-11	03:30	4.01	7.00	10.01	6.78	16.7	0.00	ND	RS	1.90
4-9-11	05:30	4.01	7.00	10.01	6.52	17.3	0.00	ND	RS	2.20
4-10-11	05:55	4.01	7.00	10.01	6.60	18.5	0.00	ND	RS	2.09
4-11-11	5:30	4.01	7.00	10.01	6.84	19.3	0.00	ND	RS	1.71
4-12-11	5:30	4.01	7.00	10.01	6.84	20.4	0.00	ND	RS	1.71
4-13-11	04:30	4.01	7.00	10.01	6.98	20.2	0.00	ND	RS	2.17
4-14-11	6:30	4.01	7.00	10.01	6.74	19.5	0.00	ND	RS	1.69
4-15-11	5:10	4.01	7.00	10.01	6.65	19.4	0.00	ND	RS	1.84
4-17-11	3:00	4.01	7.00	10.01	6.93	21.2	0.00	ND	RS	1.94
4-18-11	10:00	4.01	7.00	10.01	6.74	19.4	0.00	ND	RS	1.90
4-19-11	5:30	4.01	7.00	10.01	6.64	19.2	0.00	ND	RS	1.56
4-20-11	5:30	4.01	7.00	10.01	6.70	20.6	0.00	ND	RS	1.54
4-21-11	5:30	4.01	7.00	10.01	6.62	20.9	0.00	ND	RS	1.98
4-22-11	3:40	4.01	7.00	10.01	6.53	20.0	0.00	ND	RS	1.31
4-23-11	03:30	4.01	7.00	10.01	6.69	19.4	0.00	ND	RS	1.29
4-24-11	01:30	4.01	7.00	10.01	6.65	19.9	0.00	ND	RS	2.20
4-25-11	5:00	4.01	7.00	10.01	6.53	21.7	0.00	ND	RS	1.96
4-26-11	5:30	4.01	7.00	10.01	6.55	23.4	0.00	ND	RS	1.01
4-27-11	6:00	4.01	7.00	10.01	6.61	23.5	0.00	ND	RS	1.02
4-27-11	12:00	4.01	7.00	10.01			0.00	ND	MS	.69
4-28-11	02:30	4.01	7.00	10.01	6.76	23.8	0.00	ND	RS	1.09
4-29-11	05:00	4.01	7.00	10.01	6.52	23.4	0.00	ND	RS	1.04
4-29-11	09:40	4.01	7.00	10.01	7.11	23.3	0.00	ND	MS	.84
4-29-11	09:55	4.01	7.00	10.01	7.05	23.9	0.00	ND	MS	.82
4-30-11	08:25	4.01	7.00	10.01	7.09	22.4	0.00	ND	MS	.81

INSTRUMENT NOTES:

pH method 4500H-B

Chlorine method 4500-CL G

APPROVED BY: \_\_\_\_\_

## FAX TRANSMITTAL

To: Glenn Davis

Fax. No. 302-739-8369

From: Michael Sause

Date: April 29, 2011

Subject: Clean Delaware Waste Haulers Permit

Pages: 4 with cover

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Glenn,

Per your request during the CSI Inspection I am providing the Waste Haulers Permit for Clean Delaware, Inc. If you should have any questions, please let me know.

Thanks,  
Michael Sause  
Wastewater Manager



## Non-Hazardous Liquid Waste Transporters Permit

Issued by: Groundwater Discharges Section  
Division of Water Resources  
Department of Natural Resources  
and Environmental Control  
89 Kings Highway  
Dover Delaware 19901  
302-739-9948

**Clean Delaware LLC**  
PO Box 123  
Milton DE 19968

Permit Number: **DE WH - 013**  
Issue Date: **09/27/2006**  
Expiration Date: **09/26/2011**

Pursuant to the provisions of 7 Del. C., Chapter 60, and the State of Delaware Department of Natural Resources and Environmental Control's Guidance and Regulations Governing the Land Treatment of Wastes, permission is hereby granted to Clean Delaware LLC to operate and maintain the vehicle(s) listed in the permit application and any supplemental submissions to the Department, operated by Clean Delaware LLC, for the purpose of collecting, transporting through Delaware and disposing of the non-hazardous liquid wastes listed in Condition 1 of this permit.

A copy of this permit must accompany each permitted vehicle and be presented upon request to any law enforcement officer or representative of the Department of Natural Resources and Environmental Control.

This permit is issued subject to the following conditions:

1. Disposal site(s) for all waste(s) transported shall be the following:
  - a. Septage and holding tank waste:
    - i) The Inland Bays and/or South Coastal Regional Wastewater Treatment Facilities, Sussex County, Delaware; and
    - ii) The City of Seaford Wastewater Treatment Facility, Seaford, Delaware
  - b. Stabilized biosolids generated in the treatment of wastewater in Delaware; and lime stabilized septage, holding tank waste and other minor wastewater treatment residuals treated under State Permit LTS 4002/86S:
    - i) In accordance with Agricultural Utilization Permit # AGU 0021/92C:
      - (a) The Milton site, located on Route 30 and 16;
      - (b) The Harbenson site, located on the south side of Route 9, east of Route 5;
      - (c) The Ellendale site, located on the south side of Route 231, east of the Sowbridge Branch, east of Ellendale.
2. Permittee shall maintain a current copy of their permit/authorization documentation for each facility listed in Condition 1 on file with the Department.
3. All receiving stations must be in compliance with all Federal, State and local regulations.
4. None of the wastes shall be deposited into ditches, watercourses, lakes, ponds, tidewater sources, landed property or at any point other than the disposal site(s) mentioned in Condition 1 above.

5. All waste material collected by permittee shall be transported and disposed of in accordance with the regulations of the Department of Natural Resources and Environmental Control and upon authorization by the disposal site(s) listed in Condition 1 above. None of these wastes may be disposed of within the State of Delaware without specific permission of the Department.
6. The company name, address and permit number shall be displayed on both sides of each vehicle used for hauling purposes in letters not less than three inches high and of a color contrasting the color of the vehicle.
7. Every vehicle used for waste transporting purposes shall be equipped with a leak-proof tank or body and shall be maintained in a clean and sanitary condition. All pumps, hoses, and vehicle tanks or bodies shall be maintained so as to prevent leakage. Provisions shall be made to discharge all liquid waste through a leak-proof hose from the tank compartment of the vehicle.
8. All waste transporting truck pumping and discharge hoses shall be fitted with automatic shut-off valves at the tank compartment of the vehicle(s).
9. All vehicles used for transport shall be operated and maintained so as to be in compliance with all state and federal regulations and not present a hazard to human health or the environment through unsafe vehicle conditions. The permittee is responsible for the operation and maintenance of all vehicles operated under this permit.
10. All transporters shall at all times maintain commercial automobile liability insurance with a combined single limit of at least One Hundred Thousand Dollars (\$100,000). Permittee shall maintain a current copy of a Certificate of Insurance demonstrating compliance with this requirement on file with the Department.
11. All transporters shall maintain a current copy of their plan for the prevention, control, and cleanup of accidental discharges on file with the Department.
12. Any spill greater than 25 gallons shall be reported to the Department in writing within five days of the incident and shall include the date, time, location, and measures taken to contain and clean spill.
13. All transporters of sludge shall adhere to the following conditions:
  - a. Liquid sludge (less than 15 percent solids) shall be transported in watertight vessels such as tank trucks or other vessels which can provide equivalent protection against spills and leakage.
  - b. Sludge cake (15 - 35 percent solids) shall be transported in watertight boxes, such as dump trucks, properly sealed to prevent leaks, or cement type vehicles. When sludge cake is transported in dump trucks the following standards shall be met:
    - i) The trucks shall be equipped with splash guards firmly attached horizontally at the front and rear of the trailer;
    - ii) Each splash guard shall cover at least 25 percent of the trailer's open area; and
    - iii) A minimum two feet of freeboard shall be maintained between the sludge and the top of the trailer unless the top of the trailer is completely sealed.
  - c. Dried sludge (greater than 35 percent solids) may be transported in open boxes, such as dump trucks, which are properly sealed to prevent leakage. The trucks shall be covered with tarps or the equivalent.
14. All individuals who will be responsible for the removal of the solid and liquid contents of septic tanks, cesspools, seepage pits, holding tanks or any other individual residential on-site wastewater treatment and disposal system shall maintain a Class F License. While performing any Class F License related work, the Class F Licensee shall keep a copy of their Class F License identification card available for verification.

15. All transporters of septage shall pump on-site systems according to the Department's Class F Licensees' Policies and Guidelines for Pumping On-Site Wastewater Treatment and Disposal Systems adopted May 15, 2002 and revised April 11, 2005.
16. The only repairs a Class F Licensee is authorized to perform are the following: repair, add or replace septic tank and/or holding tank risers, baffles, lids, distribution box lids and effluent filters. No other repairs are authorized to be performed except by a Class E Licensed System Contractor who must first obtain a Repair Permit from the Department.
17. All transporters are prohibited from pumping out grease traps without first entering into a Grease Trap Maintenance Contract with the property owner. A copy of the contract document must be submitted to the Department within 15 days of signing the contract. Permittee may not enter into a Grease Trap Maintenance Contract unless the permittee has an approved facility to dispose of grease trap waste identified in this permit. Co-mingling of septage and grease trap waste is prohibited, unless specifically approved, in writing, by the facility(ies) that will be receiving the grease trap waste. If a "Grease Trap Maintenance Contract" is voided by either party, the permittee shall notify the Department in writing within 30 days.
18. Class F Liquid Waste Transporters are prohibited from pumping out holding tanks without first entering into a Sewage Holding Tank Maintenance Contract with the property owner. A copy of the contract document must be submitted to the Department within 15 days of signing the contract. If a Sewage Holding Tank Maintenance Contract is voided by either party, the permittee shall notify the Department in writing within 30 days.
19. The permittee shall maintain a bond, or other security in a form approved by the Department, in the amount of Five Thousand Dollars (\$5,000) on file with the Department. The bond shall be payable to the Department and the obligation of the bond shall be conditioned upon the fulfillment of all requirements related to the permit.
20. No waste petroleum or non-domestic waste products may be collected or discharged by any waste transporter unless in accordance with a specific permit for these types of wastes. Transportation of liquid wastes containing any petroleum products will require a permit from the Division of Air and Waste Management (302-739-9400).
21. This permit does not relieve the transporter of complying with any other applicable Federal, State or local regulations.
22. In the event that regulations or guidelines governing the activity authorized herein are revised, this permit may be reopened and modified after notice and opportunity for a public hearing. At that time, additional limitations, requirements, and/or special conditions may be included in the permit.
23. This permit may be suspended or revoked for violation of any of these permit conditions, Department regulations, orders of the Secretary, provisions of the Environmental Protection Act of 1973 (7 Del. C., Chapter 60), or failure to pay applicable Department fees.
24. A renewal application must be submitted to the Department at least 30 days prior to the expiration of this permit to ensure renewal prior to expiration.

Signed,



Marlene M. Baust  
Environmental Engineer  
Groundwater Discharges Section  
Division of Water Resources  
Department of Natural Resources and Environmental Control  
89 Kings Highway  
Dover Delaware 19901  
(302) 739-9323



## Non-Hazardous Liquid Waste Transporters Permit

Issued by: Groundwater Discharges Section  
Division of Water Resources  
Department of Natural Resources  
and Environmental Control  
89 Kings Highway  
Dover Delaware 19901  
302-739-9948

**Enviro-Organic Technologies Inc**  
2323 Marston Rd  
PO Box 600  
New Windsor MD 21776

Permit Number: **DE OH-601**  
Issue Date: 10/28/2008  
Expiration Date: 10/27/2013

Pursuant to the provisions of 7 Del. C., Chapter 60, and the State of Delaware Department of Natural Resources and Environmental Control's Guidance and Regulations Governing the Land Treatment of Wastes, permission is hereby granted to Enviro-Organic Technologies Inc to operate and maintain the vehicle(s) listed in the permit application and any supplemental submissions to the Department, operated by Enviro-Organic Technologies Inc, for the purpose of collecting, transporting through Delaware and disposing of the non-hazardous liquid wastes listed in Condition 1 of this permit.

A copy of this permit must accompany each permitted vehicle and be presented upon request to any law enforcement officer or representative of the Department of Natural Resources and Environmental Control.

This permit is issued subject to the following conditions:

1. Disposal site(s) for all waste(s) transported shall be the following:
  - a. Water residuals generated by United Water & Artesian Water and food processing residuals generated by Kraft to be disposed of in the state of Maryland.
2. Permittee shall maintain a current copy of their permit/authorization documentation for each facility listed in Condition 1 on file with the Department.
3. All receiving stations must be in compliance with all Federal, State and local regulations.
4. None of the wastes shall be deposited into ditches, watercourses, lakes, ponds, tidewater sources, landed property or at any point other than the disposal site(s) mentioned in Condition 1 above.
5. All waste material collected by permittee shall be transported and disposed of in accordance with the regulations of the Department of Natural Resources and Environmental Control and upon authorization by the disposal site(s) listed in Condition 1 above. None of these wastes may be disposed of within the State of Delaware without specific permission of the Department.
6. The company name, address and permit number shall be displayed on both sides of each vehicle used for hauling purposes in letters not less than three inches high and of a color contrasting the color of the vehicle.
7. Every vehicle used for waste transporting purposes shall be equipped with a leak-proof tank or body and shall be maintained in a clean and sanitary condition. All pumps, hoses, and vehicle tanks or bodies shall be maintained so as to prevent leakage. Provisions shall be made to discharge all liquid waste through a leak-proof hose from the tank compartment of the vehicle.
8. All waste transporting truck pumping and discharge hoses shall be fitted with automatic shut-off valves at the tank compartment of the vehicle(s).

9. All vehicles used for transport shall be operated and maintained so as to be in compliance with all state and federal regulations and not present a hazard to human health or the environment through unsafe vehicle conditions. The permittee is responsible for the operation and maintenance of all vehicles operated under this permit.
10. All transporters shall at all times maintain commercial automobile liability insurance with a combined single limit of at least One Hundred Thousand Dollars (\$100,000). Permittee shall maintain a current copy of a Certificate of Insurance demonstrating compliance with this requirement on file with the Department.
11. All transporters shall maintain a current copy of their plan for the prevention, control, and cleanup of accidental discharges on file with the Department.
12. Any spill greater than 25 gallons shall be reported to the Department in writing within five days of the incident and shall include the date, time, location, and measures taken to contain and clean spill.
13. All transporters of sludge shall adhere to the following conditions:
  - a. Liquid sludge (less than 15 percent solids) shall be transported in watertight vessels such as tank trucks or other vessels which can provide equivalent protection against spills and leakage.
  - b. Sludge cake (15 - 35 percent solids) shall be transported in watertight boxes, such as dump trucks, properly sealed to prevent leaks, or cement type vehicles. When sludge cake is transported in dump trucks the following standards shall be met:
    - i) The trucks shall be equipped with splash guards firmly attached horizontally at the front and rear of the trailer;
    - ii) Each splash guard shall cover at least 25 percent of the trailer's open area; and
    - iii) A minimum two feet of freeboard shall be maintained between the sludge and the top of the trailer unless the top of the trailer is completely sealed.
  - c. Dried sludge (greater than 35 percent solids) may be transported in open boxes, such as dump trucks, which are properly sealed to prevent leakage. The trucks shall be covered with tarps or the equivalent.
14. All individuals who will be responsible for the removal of the solid and liquid contents of septic tanks, cesspools, seepage pits, holding tanks or any other individual residential on-site wastewater treatment and disposal system shall maintain a Class F License. While performing any Class F License related work, the Class F Licensee shall keep a copy of their Class F License identification card available for verification.
15. All transporters of septage shall pump on-site systems according to the Department's Class F Licensees' Policies and Guidelines for Pumping On-Site Wastewater Treatment and Disposal Systems adopted May 15, 2002 and revised April 11, 2005.
16. The only repairs a Class F Licensee is authorized to perform are the following: repair, add or replace septic tank and/or holding tank risers, baffles, lids, distribution box lids and effluent filters. No other repairs are authorized to be performed except by a Class E Licensed System Contractor who must first obtain a Repair Permit from the Department.
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approved, in writing, by the facility(ies) that will be receiving the grease trap waste. If a "Grease Trap Maintenance Contract" is voided by either party, the permittee shall notify the Department in writing within 30 days.

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21. This permit does not relieve the transporter of complying with any other applicable Federal, State or local regulations.
22. In the event that regulations or guidelines governing the activity authorized herein are revised, this permit may be reopened and modified after notice and opportunity for a public hearing. At that time, additional limitations, requirements, and/or special conditions may be included in the permit.
23. This permit may be suspended or revoked for violation of any of these permit conditions, Department regulations, orders of the Secretary, provisions of the Environmental Protection Act of 1973 (7 Del. C., Chapter 60), or failure to pay applicable Department fees.
24. A renewal application must be submitted to the Department at least 30 days prior to the expiration of this permit to ensure renewal prior to expiration.

Signed,



Ronald E. Graeber  
Program Manager I  
Groundwater Discharges Section  
Division of Water Resources  
Department of Natural Resources and Environmental Control  
89 Kings Highway  
Dover Delaware 19901  
(302) 739-9948

DATE IN	TIME	DRIVER	GROSS WT.	TARE	DATE OUT	TIME OUT	DRIVER	NET WT.
04/22/2011	1157	Eric	76900	29620	04/26/2011	905	John	47280
04/21/2011	910	John	63540	29700	04/22/2011	1140	Eric	33840
04/18/2011	1018	John	68820	29800	04/20/2011	830	John	39020
04/14/2011	1210	John	70420	29860	04/18/2011	942	John	40560
04/13/2011	1310	John	70140	30680	04/14/2011	1110	John	39460
	1130	John	64300	29640	04/13/2011	920	John	34660
04/11/2011	925	John	70520	29920	04/12/2011	850	John	40600
04/08/2011	940	John	75200	29620	04/11/2011	850	John	45580
04/07/2011	945	John	70780	29900	04/08/2011	905	John	40880
04/06/2011	1510	John	70940	30000	04/07/2011	915	John	40940
04/04/2011	1105	John	73620	29820	04/05/2011	837	John	43800
04/01/2011	1010	John	54860	25640	04/04/2011	855	Brian	29220
03/31/2011	958	John	72160	30340	04/01/2011	920	John	41820
03/30/2011	925	John	74460	30400	03/31/2011	908	John	44060
03/29/2011	1035	John	75440	31580	03/30/2011	852	John	43860
03/25/2011	1135	Herbie	73400	31700	03/26/2011	925	John	41700
03/24/2011	1221	John	67540	29920	03/25/2011	1020	Herbie	37620
03/23/2011	1145	John	73200	29560	03/24/2011	945	John	43640
03/19/2011	1040	Paul	73360	30180	03/23/2010	900	John	43180
03/18/2011	1048	Herbie	73860	29660	03/19/2011	935	Paul	44200
03/17/2011	1025	John	71540	29740	03/18/2011	1005	Herbie	41800
03/14/2011	1013	John	69800	29560	03/17/2011	925	John	40240
03/11/2011	930	John	64860	29960				34900
03/10/2011	1110	John	69080	29780	03/11/2011	840	John	39300
03/08/2011	1450	Russell	70080	29580	03/10/2011	930	John	40500
03/07/2011		John	71280	29660	03/08/2011	1412	Russell	41620
03/04/2011	1250		68960	29940	03/07/2011	955	John	39020
03/03/2011	1340	Russell	71960	29680	03/04/2011	1210	Jeff	42280
03/01/2011	1610	Russell	71480	30540	03/02/2011	1555	John	40940
02/28/2011	1550	Russell	67600	29960	03/01/2011	1538	Russell	37640
02/25/2011	1700		68400	30320	02/28/2011	1240	John	38080
02/24/2011	1215	John	63160	29540	02/25/2011	1545	Herbie	33620
02/23/2011	840	Eric	45200	35160	02/23/2011	918	Eric	10040
02/22/2011	1220	John	64660	29720	02/24/2011	1130	John	34940
02/18/2011	1640	Russell	74460	30080	02/22/2011	947	John	44380
02/17/2011	1610	Russell	74340	29860	02/18/2011	1353	Russell	44480
02/16/2011	1337	John	62480	30160	02/17/2011	1538	Russell	32320
02/15/2011	1615	Russell	69540	30000	02/16/2011	1300	John	39540
02/12/2011	1110	Russell	70120	30200	02/13/2011	1545	Russell	39920
02/11/2011	1410	John	69040	29980	02/12/2011	1029	Herbie	39060
02/10/2011	1525	John	72340	29940	02/11/2011	1216	John	42400
02/09/2011	1000	John	80020	31700	02/10/2011	835	John	48320
02/08/2011	920	John	77700	30140	02/09/2011	852	John	47560
02/07/2011	1229	John	75440	29780	02/08/2011	843	John	45660
02/04/2011	1345	Herbie	29220	25580	02/04/2011	1658	John	3640
02/04/2011	1640	John	74560	28980	02/07/2011	927	John	45580
02/03/2011	915	John	80760	30540	02/04/2011	855	John	50220
02/02/2011	1000	John	73340	30440	02/03/2011	845	John	42900
02/01/2011	943	John	75440	29600	02/02/2011	850	John	45840
01/30/2011	1128	Eric	64560	34020	01/31/2011	1326	Eric	30540
01/28/2011	1220	Russell	68890	30460	02/01/2011	902	John	38430
01/27/2011	920	Russell	69500	29920	01/28/2011	1125	Herbie	39580
01/26/2011	940	Dave	80000	31100	01/27/2011	838	Russell	48900
01/24/2011	1425	John	74940	30540	01/21/2011	855	Dave	44400
01/23/2011	1720	John	71320	32600	01/24/2011	1130	John	38720
01/20/2011	1010	John	76500	30340	01/21/2011	825	John	46160
01/19/2011	1111	John	73740	30920	01/20/2011	930	John	42820
01/18/2011	1345	John	68320	30080	01/19/2011	1035	John	38240
01/17/2011	1515	John	72980	30280	01/18/2011	1310	John	42700
01/13/2011	1120	John	72860	29980	01/17/2011	1419	John	42880
01/12/2011	1018	Dave	51760	48660	01/12/2011	1018	Dave	3100
01/12/2011	1000	John	73380	37700	01/13/2011	930	John	35680
01/10/2011	1220	Russell	71020	35560	01/11/2011	1530	John	35460
01/07/2011	930	John	77160	30120	01/10/2011	930	Herbie	47040
01/06/2011	1010	John	78500	29920	01/07/2011	855	John	48580
01/05/2011	1650	Herbie	76680	29480	01/06/2011	915	John	47200

ALLEN'S

# **Allen Family Foods, Inc.**

Allen Family Foods, Inc.

Phone:  
FAX:  
email:

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April 26, 2011

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

RE: Section 4.04 Report

Dear Mr. Davis:

Please find enclosed an updated Section 4.04 report with a staffing plan as required under Section 4.04 of "Regulations for Licensing Operators of Wastewater Operators."

In the attached staffing 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**  
 89 Kings Highway  
 Dover, Delaware 19901

Surface Water  
 Discharges Section

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

**SECTION 4.04 REPORT**

WASTEWATER TREATMENT FACILITY			
NAME	Allen's Harbeson Wastewater Treatment Facility		
ADDRESS	18752 Harbeson Road, P.O. Box 63		
	Harbeson	Delaware	19951
	CITY	STATE	ZIP
OWNER INFORMATION			
NAME	Allen Family Foods, Inc.		
RESPONSIBLE OFFICIAL	Scott Yackel, Plant Manager	TELEPHONE NUMBER	302-684-1640
ADDRESS	126 North Shipley Street		
	Seaford	Delaware	19973
	CITY	STATE	ZIP
TYPE OF PLANT OR TYPE OF UNIT PROCESSES OPERATED			
Anoxic Ponds, Complete Mix Activated Sludge, Clarification, Chlorination, Dechlorination, Aerobic Digesters, Dissolved Air Flotation Thickeners, Belt Filter Press, Off site Pressed Sludge and DAF Sludge Disposal			
PLANT SIZE			
DESIGN FLOW	1.25	MGD	AVERAGE DAILY FLOW
	(Permitted)		0.89
			March, 2011
			MGD
OPERATOR(S) IN DIRECT REASONABLE CHARGE			
Please attach additional sheet if necessary			
Name	Lic. #	Lic. Level	Area(s) of Plant Responsibility
Michael R. Sause	522	Level 4	DRC Entire Plant
OTHER OPERATOR(S)			
Please attach additional sheet if necessary			
Name	Lic. #	Lic. Level	Area(s) of Responsibility
See attached sheet			
VERIFICATION			
4-26-11	Michael R. Sause		
DATE	SIGNATURE OF RESPONSIBLE OFFICIAL		

RETURN TO: DNREC, ATTN: SWDS, 89 KINGS HIGHWAY, DOVER, DE 19901

*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 #522
Thomas Paine	Wastewater Operator / Assistant Supervisor (DRC Entire Plant)	DE Level 3 #534
Jeffrey Bailey	Wastewater Operator / Line Leader 2 <sup>nd</sup> shift (DRC)	DE Level 2 #395
Nancy Kraus	Wastewater Operator / Laboratory (DRC) 3 <sup>rd</sup> shift	DE Level 1 #583
Robert Salensky	Wastewater Operator / 3 <sup>rd</sup> shift (DRC)	DE Level 1 #708
Frantz Fan Fan	Wastewater Operator / 1 <sup>st</sup> shift	DE Level 1 (OIT) #757
Rico Hawkins	Wastewater Operator / 2 <sup>nd</sup> shift	DE Level 1 (OIT) #756
Rob Bacon	Senior Wastewater Manager	MD Level 5 DE Level 2

### **Areas of Responsibility**

As Wastewater Manager Michael Sausé currently has Direct Responsible Charge (DRC) and overall management responsibility of the Harbeson Wastewater Treatment Facility. Rob Bacon will provide technical support and management.

The operators cover three shifts, seven days per week 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 .

# ENVIROCORP, INC

## Chain of Custody Record

Allen Foods - Harbors Monthly	
----------------------------------	--

Collection Information			Preservation		Analysis	
Lab ID #	Time	Date	Description	Yes	No	
93871	0000	8-3-10	001 Composites	Ice		BOD, TSS, TN
	0000	8-4-10		H2SO4		TP, NHA, TKN, NO3O2
	0000					pH checked by EI = <2
93872	0000	8-3-10	001 Composites - Duplicate	Ice		BOD, TSS, TN
	0000	8-4-10		H2SO4		TP, NHA, TKN, NO3O2
				No-bleb		pH checked by EI = <2
93873	0945	8-4-10	001 Grab by EI			FENT
				No-bleb		FENT
93874	0945	8-4-10	001 Grab by EI - Duplicate			Same as Before
93879	0600	8-4-10	Sludge Sample Grab			0&G
93875	0700	8-3-10	Oil & Grease Grab #1	HCL		pH checked by EI = <2
93876	0700	8-3-10	Oil & Grease Grab #1 - Duplicate			
93877	1100	8-3-10	Oil & Grease Grab #2	HCL		pH checked by EI = <2
93878	1500	8-3-10	Oil & Grease Grab #3	HCL		pH checked by EI = <2
Relinquished By:			Date	Time	Received By:	Comments
<i>[Signature]</i>			8-4-10	0945	<i>[Signature]</i>	
<i>[Signature]</i>			8-4-10	1325	<i>[Signature]</i>	

EI Labs Cooler Temp. 3.8 °C



51 Clark St. Harrington, DE 19952  
PH: 302.398.4313 FX: 302.398.4312  
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

### ANALYTICAL RESULTS

Allens Foods - Harbeson  
P.O. Box 63  
Harbeson, DE 19951  
Attention: Michael Sause

Lab ID: 093879 Matrix: Soil/Sludge Sample Start: 8/4/10 8:00  
Description: Site: Sludge Sample End:  
Type: Grab Date Received: 8/4/10 13:25

Metals		Completed	8/25/10 14:44	HJG3	EPA 200.2
<b>Metals Digestion for AA</b>					
<b>Metals -Dry Weight</b>					
Cadmium (Dry Weight)	mg/kg	<0.5	8/26/10 17:25	HJG3	EPA 6020
Copper (Dry Weight)	mg/kg	69.0	8/26/10 17:25	HJG3	EPA 6020
Lead (Dry Weight)	mg/kg	2	8/26/10 17:25	HJG3	EPA 6020
Mercury (Dry Weight)	mg/kg	<1.3	8/10/10 9:05	ALSI	SW-846 7471B
Molybdenum (Dry Weight)	mg/kg	3.5	8/26/10 17:25	HJG3	EPA 6020
Nickel (Dry Weight)	mg/kg	12	8/26/10 17:25	HJG3	EPA 6020
Potassium (Dry Weight)	mg/kg	5216	8/26/10 17:25	HJG3	EPA 6020
Silver (Dry Weight)	mg/kg	<0.5	8/26/10 17:25	HJG3	EPA 6020
Zinc (Dry Weight)	mg/kg	262	8/26/10 17:25	HJG3	EPA 6020
<b>Nutrient - As Received</b>					
Ammonia as N (As Received)	%	0.0105	8/6/10 11:52	EHK	SM4500-NH3-G
Nitrate+Nitrite as N (As Received)	%	<0.0001	8/5/10 12:22	EHK	SM4500-NO3-H
Organic Nitrogen as N (As Received)	%	1.99	8/9/10 12:44	KLS	Calc
Total Kjeldahl Nitrogen (As Received)	%	2.00	8/6/10 13:56	EHK	SM4500-Norg-C
Total Nitrogen as N (As Received)	%	2.00	8/9/10 12:44	KLS	Calc
Total Phosphorus as P (As Received)	%	0.659	8/10/10 11:11	EHK	SM4500-P-F(w/Dig)
<b>Nutrient-Dry Weight</b>					
Ammonia as N (Dry Weight-Sludge)	%	0.064	8/6/10 11:52	EHK	SM4500-NH3-G
Nitrate+Nitrite as N (Dry Weight - Sludge)	%	<0.0006	8/5/10 12:22	EHK	SM4500-NO3-H
Organic Nitrogen as N (Dry Weight - Sludge)	%	12.1	8/9/10 12:44	KLS	Calc
Total Kjeldahl Nitrogen (Dry Weight-Sludge)	%	12.2	8/6/10 13:56	EHK	SM4500-Norg-C
Total Nitrogen as N (Dry Weight - Sludge)	%	12.2	8/9/10 12:44	KLS	Calc
Total Phosphorus as P (Dry Weight-Sludge)	%	4.02	8/10/10 11:11	EHK	SM4500-P-F(w/Dig)
<b>Physical</b>					
% Solids	%	16.4	8/5/10 15:48	RON	SM2540-G
pH	SU	7.26	8/4/10 16:25	DAM	SM4500-H+/B

ND = Not Detected  
\* = Above Specified Limit  
\*\* = Above Client Limit

*Sully Brown*



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

**June 03, 2011**

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:** 1105013  
**Project Description:** Allen Family Foods  
**Date Received:** 05/05/2011  
**Time Received:** 13:05

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!***



*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*

**PROJECT NARRATIVE**

Project Name: Allen Family Foods

Order Number 1105013

Sample Number 001

Matrix: Waste Water

Oil & Grease: The recovery for the MS was 72% and is outside the lower quality control limit of 78%. The recovery for the laboratory control spike (LCS/OPR) was 99.8%. Poor performance of the MS is most likely due to matrix interference, no further action was taken.



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

**ANALYSIS REPORT**

<b>ELS Sample Number:</b>	1105013-001	<b>Matrix:</b>	Waste Water			
<b>Client Sample Description:</b>	001	<b>Sampling Method:</b>	Grab			
<b>Site ID:</b>	001	<b>Date and Time Collected:</b>	5/5/2011	10:50		
<i>Test Parameter</i>		<i>Method</i>	<i>Result</i>	<i>Units</i>	<i>Qualifier</i>	<i>LOQ</i> <i>Analysis Date</i>
<b>Aggregate Organic Constituents</b>						
N-Hexane Extractable Material		EPA 1664	< 5.2	mg/L		5.2 05/23/2011
<b>Microbiological Examination</b>						
Enterococcus		USEPA 1600	< 1	cfu/100ml		1 05/06/2011

**ANALYSIS REPORT**

<b>ELS Sample Number:</b>	1105013-002	<b>Matrix:</b>	Waste Water			
<b>Client Sample Description:</b>	001-1	<b>Sampling Method:</b>	Grab			
<b>Site ID:</b>	001-1	<b>Date and Time Collected:</b>	5/5/2011	10:51		
<i>Test Parameter</i>		<i>Method</i>	<i>Result</i>	<i>Units</i>	<i>Qualifier</i>	<i>LOQ</i> <i>Analysis Date</i>
<b>Microbiological Examination</b>						
Enterococcus		USEPA 1600	< 1	cfu/100ml		1 05/06/2011



## 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	The parameter was detected in the method blank at a concentration that was both above the MDL and greater than 10% of the sample concentration.
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). This analytical behavior was verified with additional testing.
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.
FB	The parameter was detected in the field blank at a concentration that was both above the MDL and greater than 10% of the sample concentration.
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.
LOQ	Limit of Quantitation
MDL	Method Detection Limit
N	This flag indicates presumptive evidence of a compound. This flag is only used for TICs, where the identification is based on a mass spectral library search and must be used in combination with the J flag. It is applied to all TIC results. For generic characterization of a TIC, such as chlorinated hydrocarbon, or for an "unknown" (no matches >= 85%), the "N" flag is not used.
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.
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
TIC	Tentatively identified compound from a GC/MS library search.
U	Compound was analyzed but not detected. The method detection limit is reported.
USGS	USGS Gauge
V	Analysis performed after holding time expired.



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## *Qualifier Codes, Definitions, and Abbreviations*

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### **Units**

CFS	Cubic Feet per Second.
cfu/100mL	Colony forming units per 100 mL.
G	gram; there are 1000 g in 1 Kg.
GPM	Gallons per minute.
IN	Inches.
Kg	Kilogram.
L	Liter.
mg	milligram; there are 1000 mg in 1 g.
MGD	Millions of Gallons per Day.
ml	milliliter; there are 1000 ml in 1 L.
mpn/100mL	most probable number per 100 mL.
NTU	Nephelometric Turbidity Units. NTU is numerically equivalent to Formazin turbidity unit (FTU).
oC	Celsius.
pCi/L	Pico curie per liter.
ppb	Parts per billion=ug/Kg, ug/L.
ppm	Parts per million=mg/Kg, ug/g, mg/L, ug/ml; 1 ppm=1000 ppb.
su	Standard Units.
ug	microgram; there are 1000 ug in 1 mg.
uL	microliter; there are 1000 ul in 1 ml.
uMhos	Conductivity units for laboratory measurements.
uS	micro siemens; units used to measure conductivity in the field; same as uMhos.





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

**June 08, 2011**

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:** 1105014  
**Project Description:** Allen Family Foods  
**Date Received:** 05/06/2011  
**Time Received:** 11:20

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!***



*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*

**PROJECT NARRATIVE**

Project Name: Allen Family Foods

Order Number: 1105014

Matrix: Waste Water

This order consisted of one sample for a seeded 5-day BOD analysis. The laboratory control sample tested along with this sample exceeded the allowable upper QC limit by approximately twenty-two percentage points. Upon investigation, it was determined that the LCS material had expired. The sample result has been qualified with "QC." However, it is the opinion of the laboratory that the sample result was not affected.



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

**ANALYSIS REPORT**

<b>ELS Sample Number:</b>	1105014-001	<b>Matrix:</b>	Waste Water			
<b>Client Sample Description:</b>	001	<b>Sampling Method:</b>	Composite			
<b>Site ID:</b>		<b>Date and Time Collected:</b>	5/6/2011			
<b>Test Parameter</b>	<b>Method</b>	<b>Result</b>	<b>Units</b>	<b>Qualifier</b>	<b>LOQ</b>	<b>Analysis Date</b>
<b>Inorganic Nonmetallic Constituents</b>						
Nitrogen, Total, Alkaline Persulfate	APHA 4500-P-J	14.3	mg/L		0.500	05/10/2011
Phosphorus, Total, Alkaline Persulfate	APHA 4500-P-J	0.028	mg/L		0.010	05/10/2011
<b>Organic Aggregate Constituents</b>						
BOD, 5-Day (Seeded)	APHA 5210-B	< 2.40	mg/L	QC	2.40	05/06/2011
<b>Physical and Aggregate Properties</b>						
Residue, Nonfilterable (TSS)	APHA 2540-D	9	mg/L		2	05/12/2011



## Qualifier Codes, Definitions, and Abbreviations

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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.
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MDL	Method Detection Limit
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NA	Not Analyzed but required by project workplan or analytical request form.
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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)
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TIC	Tentatively identified compound from a GC/MS library search.
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USGS	USGS Gauge
V	Analysis performed after holding time expired.



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## *Qualifier Codes, Definitions, and Abbreviations*

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### **Units**

CFS	Cubic Feet per Second.
cfu/100mL	Colony forming units per 100 mL.
G	gram; there are 1000 g in 1 Kg.
GPM	Gallons per minute.
IN	Inches.
Kg	Kilogram.
L	Liter.
mg	milligram; there are 1000 mg in 1 g.
MGD	Millions of Gallons per Day.
ml	milliliter; there are 1000 ml in 1 L.
mpn/100mL	most probable number per 100 mL.
NTU	Nephelometric Turbidity Units. NTU is numerically equivalent to Formazin turbidity unit (FTU).
oC	Celsius.
pCi/L	Pico curie per liter.
ppb	Parts per billion=ug/Kg, ug/L.
ppm	Parts per million=mg/Kg, ug/g, mg/L, ug/ml; 1 ppm=1000 ppb.
su	Standard Units.
ug	microgram; there are 1000 ug in 1 mg.
uL	microliter; there are 1000 ul in 1 ml.
uMhos	Conductivity units for laboratory measurements.
uS	micro siemens; units used to measure conductivity in the field; same as uMhos.



# FIELD CHAIN OF CUSTODY

(Complete in BLUE ink)

Environmental Laboratory Section - Division of Water  
Department of Natural Resources and Environmental Control  
89 King Highway, Dover, DE 19901 (302) 739-9942



Client : Cathy L. Sim Report To : Cathy L. Sim  
 Address : 89 Kings Highway Invoice To : Donna Faries  
 Phone No.: (302) 739-9942 Account : \_\_\_\_\_  
 ELS Order ID : \_\_\_\_\_

PROJECT NAME		Ammonia										REMARKS
SAMPLERS (Please Print)												
(E.L.S. Use Only) Lab Log No.	Client Sample Description	Sample Date	Sample Time	Matrix	Comp	Grab	No. of Containers	Ammonia, total	Ammonia, diss	ANALYSES		
1105006-031		5/17/11	1140	SW		✓	1	✓				
1105011-001		5/4/11	1230	SW		✓	1	✓				
1105011-002		5/4/11	1330	SW		✓	1	✓				
1105014-001		5/6/11		WW		✓	1	✓				
1105034-001		5/24/11	0757	SW		✓	1	✓				
1105034-002		5/24/11	0831	SW		✓	1	✓				
1105034-003		5/24/11	0855	SW		✓	1	✓				
1105034-004		5/24/11	0911	SW		✓	1	✓				
1105034-005		5/24/11	0930	SW		✓	1	✓				
1105034-006		5/24/11	0848	SW		✓	1	✓				
RELINQUISHED BY: (signature)		DATE		TIME		RECEIVED BY: (signature)						
<i>Renee Heman</i>												
COMMENTS:												
Is laboratory chain-of-custody required? Yes / No												

DW - drinking water  
 ER - equip rinse  
 GW - ground water  
 Lab - lab water  
 LW - liquid waste  
 SE - sediment  
 SI - sludge  
 SO - soil  
 SW - surface water  
 TI - tissue  
 WS - solid waste  
 WW - waste water

ELS USE ONLY  
 Sample Conditions (circle response):  
 1. Samples match COC? Yes/No 2. Bottles supplied by ELS? Yes/No 3. Samples received broken/leaking? Yes/No 4. Cooler temp bottle 2-6 degrees? Yes/No/NA  
 5. Properly preserved? Yes/No 6. VOA/DO containers free of headspace? Yes/No/NA 7. Holding times expired? Yes/No 8. Volume sufficient for analysis? Yes/No



51 Clark St. Harrington, DE 19952  
PH: 302.398.4313 FX: 302.398.4312  
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

### ANALYTICAL RESULTS

DNREC - Environmental Laboratory Sect.  
89 Kings Highway  
Dover, DE 19901  
Attention: Ben Pressley

Lab ID: 109328      Matrix: Waste Water      Sample Start: 5/6/11  
Description:      Site: 1106014-001      SampleEnd:  
Type: Grab      Date Received: 5/25/11 16:58

Parameter	Units	Results	Analyzed	By	Method
<b>Nutrient</b>					
Ammonia as N	mg/L	0.081	5/27/11 9:08	EHK	SM4500-NH3-G

ND = Not Detected  
\* = Above Specified Limit  
\*\* = Above Client Limit

# FIELD CHAIN OF CUSTODY

(Complete in BLUE ink)

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



Client : Cathy L. Sim Report To : Cathy L. Sim  
 Address : 89 Kings Highway Invoice To : Donna Faries  
 Phone No.: (302)739-9942 Account : \_\_\_\_\_  
 ELS Order ID : \_\_\_\_\_

PROJECT NAME		Ammonia													
SAMPLERS (Please Print)		ANALYSES													
(ELS Use Only) Lab Log No.	Client Sample Description	Sample Date	Sample Time	Matrix	Comp	Grab	No. Of Containers	Ammonia, total			Ammonia, free			REMARKS	
								✓	✓	✓	✓	✓	✓		✓
109335	1105006-031	5/17/11	1140	SW	✓	✓	1	✓	✓	✓					
109336	1105011-001	5/4/11	1330	SW	✓	✓	1	✓	✓	✓					
109337	1105011-002	5/4/11	1330	SW	✓	✓	1	✓	✓	✓					
109338	1105014-001	5/6/11		WW	✓	✓	1	✓	✓	✓					
109339	1105034-001	5/24/11	0757	SW	✓	✓	1	✓	✓	✓					
109340	1105034-002	5/24/11	0831	SW	✓	✓	1	✓	✓	✓					
109331	1105034-003	5/24/11	0855	SW	✓	✓	1	✓	✓	✓					
109332	1105034-004	5/24/11	0911	SW	✓	✓	1	✓	✓	✓					
109333	1105034-005	5/24/11	0930	SW	✓	✓	1	✓	✓	✓					
109334	1105034-006	5/24/11	0848	SW	✓	✓	1	✓	✓	✓					
RELINQUISHED BY: (signature)		DATE		TIME		RECEIVED BY: (signature)									
<i>Ronald Henon</i>		5/25/11		1535		<i>J. W. [Signature]</i>									
COMMENTS:															
Is laboratory chain-of-custody required? Yes / No															

**ELS USE ONLY**  
 Sample Conditions (circle response):  
 1. Samples match COC? Yes/No 2. Bottles supplied by ELS? Yes/No 3. Samples received broken/leaking? Yes/No 4. Cooler temp bottle 2-6 degrees? Yes/No/NA  
 5. Properly preserved? Yes/No 6. VOA/DO containers free of headspace? Yes/No/NA 7. Holding times expired? Yes/No 8. Volume sufficient for analysis? Yes/No

4-27-11 Allen's Family Foods (CSF)

- Arrived @ approx. 0920 hrs and met Mike Sause (w/w Mgr.), Rob Bacon (Sr. w/w Mgr.), & Scott Hamner (Dir of Tech Services).

- All floatables & fat from DAF Unit goes to a PNE TANK  $\approx$  20,000 gal. owned by Organic Technologies EST. EST hauls to MD for land application. No analytical done by Allen's.

★ - Sludge from Belt Press goes into trailer and hauled away by Clean Resource, Inc. for land application. Sludge inventory is kept by Allen's leaving the facility, but no documented evidence of hauler, or application area.

- Wastewater effluent for beneficial reuse in Offal area and for wash down in the plant ( $\approx$  250,000 gpd).

- Effluent clear, no floating solids, no shear & no odor.

- Two (2) anoxic ponds (1.5 mm each)

Flow from DAF is split to these two.

- Flow from Anoxic Ponds goes to CMAA #1 Complete Mix Activated Sludge.

4-27-11 Allen's FF (cont'd)

- Flow from CMAS #1 goes to CMAS #2
- Flow from CMAS #2 goes to clarifier
- Flow from clarifier goes to an old clarifier for further settling.
- Using Sodium Hypochlorite for disinfection and Sodium Bisulfite for dechlor.
- Took sample of effluent and Mike tested for TRC. Powder pillow (PP) approx. 7/15  
TRC = 0.00

- Took sample prior to dechlor and analyze for TRC = 0.69 METHOD 4500-CCG

\* - Duplicates on pH & TRC are only done 1x per month; need to have at least 2 per month per permit requirements

\* - Composite sampler is not flow proportioned. Reminded them that it must be, because the flow varies by more than  $\pm 15\%$ .

①  
Mikes  
and  
May

\* - Reviewed SWP - last training Sept. 2010. New employees have not received training. will be done by end of May! SWP has not been updated since March 2006. Plan needs to be updated. Target: Nov. 1. SPC Plan last updated Feb 2009. Inspections are not being put on proper forms.

4/27/11 Allen's Pt (cont'd)

- \* - Reviewed OMR for Jan 2011 Dec. 2010 and found the leading data was inconsistent from raw to OMR.
- Reviewed Nov 2010 - ACK
- Reviewed Jan 2011 - ACK
- Reviewed Feb 2011 - ACK
- \* - Mike will send in revised Dec. 2010 OMR.
- Flow measurement by Parshall Flume w/ ultra-sonic cast calib. 08/10
- They have equipment manuals but no real O&M Manual for ops.
- \* - Need a real O&M Manual, by April 1, 2012.
- Held closing meeting
- Reported facility @ approx 1545 hrs.





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

Certified Mail # 7006 3450 0003 3848 4126  
Return Receipt Requested

May 23, 2011

Allen's Family Foods, Inc.  
Mr. Mike Sause' – Wastewater Manager  
P.O. Box 63  
Harbeson, DE 19951

Re: Manager's Deficiency Warning Letter and Inspection Summary  
Compliance Sampling & Inspection Sampling (CSI) – April 27, 2011  
NPDES Permit No. DE-0000299

Dear Mr. Sause':

On behalf of the State of Delaware, Surface Water Discharges Section, Compliance Branch, I would first like to thank you, Mr. Rob Bacon, Mr. Tom Paine, and your associates for the cooperation and assistance given during the Compliance Sampling & Inspection (CSI) completed at your facility on April 27, 2011.

Laboratory records, reagents, instrumentation, and methods were reviewed for conformance to NPDES requirements, and were found to be in accordance with these requirements. Overall WWTP operation, plant housekeeping, and solids handling were very good and your operators were very cooperative, very helpful, and very knowledgeable. It was also very good to see that a significant amount of WWTP Effluent Water is now being utilized for internal washdowns, and other non-potable water industrial activities; a wonderful beneficial reuse of your treated WWTP effluent. During this CSI, Discharge Monitoring Reports and support data were checked for the months of December 2010, November 2010, January 2011, and February 2011; with the exception of the December 2010 DMR, all data was found to be accurate and traceable to raw data. The December 2010 DMR had data for "loading" that was inconsistent with the raw data, and must be revised (Note: the revised DMR was received within a week of this CSI . . . thank you).

*Delaware's good nature depends on you!*

During this CSI, the following were observed and noted:

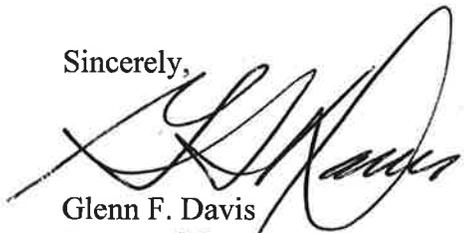
- Found that duplicates on pH and Total Residual Chlorine were only being completed at a rate of one time per month. Your NPDES permit requires that duplicates be analyzed on 5% of the samples or once per month, whichever is greater. Since you are required to analyze both parameters daily, this would require you to analyze duplicates at a minimum rate of two times per month. I want to thank you for your prompt attention to this item and your letter of May 3, 2011 showing documented evidence that duplicates for pH and TRC had been completed in April, and this practice would continue forward.
- Found that the composite sampler was not sampling plant effluent in proportion to the flow as required in your NPDES permit (Part ID.3g). If flow from the facility is not constant (varies by more than 15%), a flow proportioned sampling must be completed. Allen's FF must begin composite sampling in accordance with its NPDES permit, by the June, 2011 sampling events.
- A review of the Storm Water Plan revealed that the last training completed was in September, 2010, however, no new employees since that date have received training. There was also a question on who was actually getting the training. According to your Storm Water Plan, all employees will receive training. The Storm Water Plan, Employee Training requirement must be completed by the end of May, 2011. The Storm Water Plan was last updated in March, 2006; the plan must be updated in 2011, and Allen's FF management has agreed to have this completed by November 1, 2011.
- The potential for storm water discharges at Outfalls 002 and 003 was discussed, and it was noted that the monthly Discharge Monitoring Reports (DMR's) are always checked as "No Discharge" for both outfalls. Allen's FF was not able to produce any documented evidence that these storm water outfalls never had any discharge; if there were inspections of these outfalls before, during, or after rain events, there was no written documentation that any inspections had been completed. An inspection sheet is required, that will require operators, supervisors, and/or managers to sign-off on an actual outfall inspection before, during, and after any rain event to document any discharge or non-discharge. If there is discharge, Part IB.2 of your NPDES permit requires that this discharge must be sampled within the conditions specified, and analyzed for the parameters indicated.
- The plant SPCC Plan was last updated in February 2009; a review of the training and inspection components of the plan indicated that the proper forms for the monthly and annual inspections are not being utilized, and the annual inspections could not be documented. You must use the forms specified in your SPCC Plan when making the required inspections, and these forms must be signed by the person making the inspections, and held as documented evidence of the inspections.
- Operations & Maintenance Manuals (individual) are available for the equipment utilized in the Wastewater Treatment Plant, however, nothing is very organized. The plant must develop a systematic and formal Operations and Maintenance Manual that is reviewed on a regular basis, and contains documented evidence that the manual is being reviewed/updated, and approved.

Allen's Family Foods, Inc.  
CSI – April 27, 2011  
Page Three

The Surface Water Discharges Section is attempting to gain voluntary compliance in accordance with 7 Del.C. § 6019. Please send your formal written response, including any corrective/preventative actions to the above noted deficiencies, by no later than 30 days after receiving this letter. The formal written response must be mailed to my attention at Delaware-DNREC, Division of Water Resources, Surface Water Discharges Section, Compliance & Enforcement Branch, 89 Kings Highway, Dover, DE 19901.

On behalf of the State of Delaware, Surface Water Discharges Section, Compliance & Enforcement Branch, I would again like to thank you, Rob Bacon, Tom Paine, and everyone at the Allen's Family Foods, Harbeson, Delaware Plant, for the cooperation and participation in this Compliance Sampling Inspection program to help assure the continued quality of NPDES effluent waters and the self-reporting data. If you have any questions, please contact me at 302-739-9946.

Sincerely,



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

ccopy: Mr. Robert Underwood – DNREC



THE QUALITY CHICKEN PEOPLE

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**ALLEN FAMILY FOODS, INC.**

P.O. Box 63  
18752 HARBESON RD.  
HARBESON, DE 19951  
302/684-1640 FAX: 302/684-1638

June 20, 2011



Mr. Glenn Davis, Program Manager  
Department of Natural Resources and Environmental Control  
Surface Water Discharges Section  
89 Kings Highway  
Dover, Delaware 19901

Re: Compliance Sampling and Inspection Sampling (CSI) – April 27, 2011

Dear Mr. Davis:

Allen Family Foods, Inc. is in receipt of your letter in regard to the subject compliance and inspection sampling conducted on April 27, 2011. This letter shall address the items listed in your letter in the order presented. The following is noted:

- Duplicates on pH and chlorine residual are now being run on the first and second day of each month in accordance with our NPDES permit.
- The composite sampler was repaired and programmed for flow paced composite sampling on June 2, 2011 by Horney Industrial Electronics (HIE). All future sampling events will be composite flow paced.
- Storm water plan training was completed for new employees Rico Hawkins and Frantz Fan Fan on May 6, 2011. An updated storm water plan will be developed by November 1, 2011.
- In reference to Storm water discharges at Outfalls 002 and 003 it is and will continue to be the policy of Allen Family Foods, Inc. to capture all storm water and pump it into the wastewater treatment plant. Allen's has retained BP Environmental to evaluate the outfalls for ability to discharge if necessary. It was recommended that Allen's place 6" to 8" rock with weirs for potential sampling and flow measurement at each outfall. This recommendation is being evaluated by Allen's in house engineering staff.

During rain events the wastewater employees will document in the plant log book the rain

activity, checks on the storm water stations and outfalls before, during and after each rain event.

- The SPCC inspections will be performed in accordance with the SPCC plan. Allen Family Foods, Inc. is reviewing the inspections sheets provided in the plan with the intent to replace them with more specific inspection sheets related to the facility. This updated inspection sheet will be placed in the SPCC plan as a reference document.
- A draft Operations and Maintenance manual has been developed. This manual will be revised to reflect current operating conditions.

If you should have any questions, please do not hesitate to contact me at (302) 684-1640, Ext. 184.

Respectfully submitted,  
Allen Family Foods, Inc.

A handwritten signature in cursive script that reads "Michael R. Sausé".

Michael R. Sausé  
Wastewater Manager