



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

PERMIT NO.  
NE 0000299

**SECTION F - Facility and Permit Background**

ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY <i>(Including City, County and ZIP code)</i>	DATE OF LAST PREVIOUS INVESTIGATION BY EPA/STATE 4/30/12
	FINDINGS See Report

**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	<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 <i>(e.g., consistent with self-monitoring report data)</i>	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A

(b) MONITORING RECORDS *(e.g., flow, pH, D.O., 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.  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. *BP Environ.*  YES  NO  N/A

(g) QUALIFIED OPERATING STAFF PROVIDED.  YES  NO  N/A

(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS. *WJT, DTCL, DENA*  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. *Last update Dec 2012*  YES  NO  N/A

(l) SPCC PLAN AVAILABLE. *Last update 12/2011*  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 0000299

**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 \_\_\_\_\_)  
w/ultra sonic
- (b) CALIBRATION FREQUENCY ADEQUATE. (Date of last calibration 9/12)  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 ICED  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. Process Control  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. PH + TRC S76  YES  NO  N/A
- (g) SPIKED SAMPLES ARE USED. \_\_\_\_\_ % 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 Envirocorp Labs  
LAB ADDRESS Harrington, DE

PERMIT NO.  
DE0000299

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	NO	No	CLEAR	/	
002	No Flow							
003								
004								

(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

sampled on 5/1/13

COMPOSITING FREQUENCY flow prop. PRESERVATION ICED  
 SAMPLE REFRIGERATED DURING COMPOSITING:  YES  NO ICE  
 SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE yes

SECTION N - Analytical Results (Attach report if necessary)

- see attached analytical report



**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>Allen's Harim Foods, LLC Harbeson, DE</i>	Entry Date/Time <i>4/25/13 8:00 hrs</i>
Facility Permit No. <i>DE 0000299</i>	Exit Date/Time <i>4/25/13 1330 hrs</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) *002, 003, 004*

RECORDS REVIEW		Yes	No	S/C
1)	<b>Storm Water Plan.</b> 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>DEC 2011</i>	<input checked="" type="checkbox"/>		
2)	<b>Training.</b> 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 checked="" type="checkbox"/>		
3)	<b>Inspection Records.</b> Are storm water inspections conducted and documented? Please describe. <i>quarterly, semi-annual</i>	<input checked="" type="checkbox"/>		
4)	<b>Monitoring Data.</b> Has the facility performed storm water monitoring as required by the permit?	<input checked="" type="checkbox"/>		
5)	<b>Spill and Leaks.</b> 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 checked="" type="checkbox"/>	<i>N/A</i>

PHYSICAL INSPECTION		Yes	No	S/C
1)	<b>Storm Water Outfalls.</b> Are storm water outfalls identified as required? Outfalls free of trash/ debris/erosion? Any non-storm water discharges occurring?	<input checked="" type="checkbox"/>		
2)	<b>Storm Water Conveyance System.</b> 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"/>		
3)	<b>Good Housekeeping Practices.</b> Are outside areas kept neat and clean? Is process debris removed regularly? Is there evidence of leaks/spills? 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 checked="" type="checkbox"/>		
4)	<b>Storm Water Pollution:</b> materials being stored in a manner that minimizes their exposure to storm water?	<input checked="" type="checkbox"/>		
5)	<b>Storm Water Visual Observations:</b> Are the following present in storm water discharges or do the outfalls indicate evidence thereof?			

OUTFALL NUMBER	OIL SHEEN	VISIBLE FOAM	VISIBLE FLOATING SOLIDS	COLOR
<i>001 002, 003, 004</i>	<i>NO ALL DRY &amp; CLEAN</i>	<i>NO</i>	<i>NO</i>	<i>CLEAR</i>

**COMMENTS**

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Compliance Status At Time of Inspection: *compliant*

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

Inspector's Printed Name: *Nicole Smith*

Inspector's Signature: *Nicole Smith* Date: *4/25/13*



HORNEY INDUSTRIAL ELECTRONICS

*Process Control Technology*

## CERTIFICATE OF CALIBRATION

Date : September 10, 2012

Allen Harim Foods, LLC  
18752 Harbeson Rd.  
Harbeson, DE 19951

Purchase Order: 4500107165

Job#:606674

**Manfg.**

Siemens Hydro 200  
H/W DR45AT

**Serial#**

PBDC3/20030  
C40000000254023

**Range**

0-1200 GPM  
0-1200 GPM

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



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

ENVIRONMENTAL  
LABORATORY SECTION

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

May 23, 2013

J. Chris Cleaver  
DW - 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:** 1305002  
**Project Description:** DE0000299 Allen Harim Foods  
**Date Received:** 05/01/2013  
**Time Received:** 13:30

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!*



**ANALYSIS REPORT**

<b>ELS Sample Number:</b>	1305002-001	<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>	5/1/2013			
<i>Test Parameter</i>	<i>Method</i>	<i>Result</i>	<i>Units</i>	<i>Qualifier</i>	<i>LOQ</i>	<i>Analysis Date</i>
<b>Inorganic Nonmetallic Constituents</b>						
Ammonia as N, Total	USEPA 350.1	0.061	mg/L		0.020	05/01/2013
Nitrogen, Total, Alkaline Persulfate	APHA 4500-P-J	8.37	mg/L		0.100	05/13/2013
Phosphorus, Total, Alkaline Persulfate	APHA 4500-P-J	0.094	mg/L		0.010	05/13/2013
<b>Organic Aggregate Constituents</b>						
BOD, 5-Day (Seeded)	APHA 5210-B	< 1.62	mg/L		2.40	05/07/2013
<b>Physical and Aggregate Properties</b>						
Residue, Nonfilterable (TSS)	APHA 2540-D	8	mg/L		2	05/02/2013

**ANALYSIS REPORT**

<b>ELS Sample Number:</b>	1305002-002	<b>Matrix:</b>	Waste Water			
<b>Client Sample Description:</b>	001	<b>Sampling Method:</b>	Grab			
<b>Site ID:</b>		<b>Date and Time Collected:</b>	5/1/2013 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	< 5.0	mg/L		5.0	05/16/2013
<b>Microbiological Examination</b>						
Enterococcus	USEPA 1600	< 1	cfu/100ml		1	05/02/2013

**ANALYSIS REPORT**

<b>ELS Sample Number:</b>	1305002-003	<b>Matrix:</b>	Waste Water			
<b>Client Sample Description:</b>	001-1	<b>Sampling Method:</b>	Grab			
<b>Site ID:</b>		<b>Date and Time Collected:</b>	5/1/2013 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	05/02/2013



## 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 LOQ 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.
FB	The parameter was detected in the field blank at a concentration that was both above the LOQ 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 reported.
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.
UR	Unusual result. See narrative for an explanation.
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 &  
ENVIRONMENTAL CONTROL  
**DIVISION OF WATER**  
89 KINGS HIGHWAY  
DOVER, DELAWARE 19901

Surface Water Discharges Section

Telephone: (302) 739-9946  
Facsimile: (302) 739-8369

April 30, 2013

Allen's Harim Foods, LLC  
Mr. Michael Sausé - Wastewater Manager  
P.O. Box 277  
18752 Harbeson Road  
Harbeson, DE 19951

Re: Compliance Sampling & Inspection (CSI) - April 25, 2013  
NPDES Permit No. DE-0000299

Dear Mr. Sausé,

On behalf of the State of Delaware, Surface Water Discharges Section, Compliance & Enforcement Branch, I would first like to thank you, Jeff Bailey, Jason Reale, LouAnn Parson, and Roy Barger for the cooperation and assistance given during the Compliance Sampling & Inspection (CSI) completed at your facility on April 25, 2013.

Laboratory records, reagents, instrumentation, and methods were reviewed and found to be in accordance with NPDES requirements. The January 2013 Discharge Monitoring Report (DMR) was reviewed and all entries traced back to raw data. Outfall 001 was inspected and the effluent quality looked very good. Overall, the housekeeping was excellent and everyone at the Harbeson facility is to be complimented for their efforts.

During this inspection, a comprehensive Storm Water Evaluation was also completed and overall compliance was very good. A review of the SWPP and SPCC plans showed that all inspections and training are up to date. The outfalls were inspected and were clean and dry at the time of inspection. The new sampling station at Outfall 002 has been installed and was inspected as well.

During this CSI, there were no observable deficiencies and everyone at Allen's Harim Foods is to be commended for their efforts.

*Delaware's good nature depends on you!*

Allen's Harim Foods, LLC  
CSI - April 25, 2013  
Page Two

I would like to again thank you for your cooperation and participation in this Compliance Sampling & Inspection program to help assure the quality of NPDES effluent waters and the self-reporting data. If you have any questions, please contact Glenn Davis or me at 302-739-9946.

Sincerely,



Nicole L. Smith  
Senior Environmental Compliance Specialist  
Compliance & Enforcement Branch  
Surface Water Discharges Section  
State of Delaware - DNREC

Ecopy: Mr. Bryan Ashby - DNREC  
Mr. Glenn Davis - DNREC

**Allen Harim Foods, LLC  
Harbeson, Delaware Plant  
Annual Compliance Sampling and Inspection  
April 25, 2013**

On Thursday, April 25, 2013, Nicole Smith of the State of Delaware, Department of Natural Resources and Environmental Control, Division of Water, Surface Water Discharges Section, Compliance & Enforcement Branch, completed a Compliance Sampling and Inspection of the Allen Harim Foods, LLC, Harbeson Wastewater Treatment Plant (WWTP). Nicole Smith is the Senior Environmental Compliance Specialist for the Compliance & Enforcement Branch.

The inspector arrived at the Harbeson, Delaware facility at approximately 0900 hrs., presented her identification to the security guard on duty, and informed him that she was there to see Mr. Michael Sause' for the purpose of completing an inspection of the Wastewater Treatment Plant. After receiving a visitor ID badge, the inspector drove to the WWTP, where she met with Mr. Michael Sause' (WWTP Supervisor), Mr. Jason Reale (Corporate Project Engineer), Mr. Roy Barger (Maintenance Manager), Ms. Lou Ann Parson (President, BP Environmental, Inc.), and Mr. Jeff Bailey (WWTP Senior Operator). After a short pre-inspection meeting, the inspector made a thorough inspection of the entire WWTP and included a review of the facility's storm water management practices.

**WWTP Process**

The Harbeson, Delaware Plant is a poultry processing plant that utilizes an activated sludge process, with anoxic/oxic ponds, clarifiers, dissolved air floatation (DAF), filter press, chlorination, and dechlorination. Poultry processing wastewater is pumped to the DAF where first stage solids are removed and sent to a holding tank. These solids are removed by Enviro Organic Technologies (EOT) for recycling in by-products. Effluent from the DAF is treated with Magnesium Oxide for alkalinity control and is then pumped to two (2) "Anoxic Ponds" (1.5 million gallons each), where it goes through a series of aeration/no aeration for nutrient removal and first stage organic reduction. Sanitary waste from the production facility is also pumped directly to the "Anoxic Ponds" and is co-mingled with the poultry processing wastewater.

From the "Anoxic Ponds", the wastewater flows to a Complete Mix Activated Sludge (CMAS) Tank #1 that has a capacity of approximately 1.6 M gallons. From CMAS #1, the activated sludge is gravity fed to CMAS #2 and is treated with Aluminum Chloride during the transfer for phosphorus removal. Flow is then gravity fed to the Circular Clarifier (polymer is added between CMAS #2 and the Clarifier to aide in solids settling). Effluent from the Circular Clarifier then goes to an old rectangular clarifier for further solids settling and then to the concrete labyrinth style chlorine contact chamber. Metered Sodium Hypochlorite is used for disinfection (chlorination) and Sodium Bisulfite is used for dechlorination.

Waste Activated Sludge (WAS) from the clarifiers is sent to two (2) Aerobic Digesters. After settling/decanting, the sludge from the Aerobic Digesters is pumped to a sludge filter press for processing.

Filtrate from the filter press operation is sent to the "Anoxic Ponds" for treatment, and the sludge cake is picked up by Clean Delaware, Incorporated (CDI) and land applied (by permit). Sludge hauling permits for EOT and CDI were both documented and confirmed. Treated and disinfected water from the treatment process is discharged via Outfall 001 to Beaver Dam Creek which discharges to the Broadkill River.

### **Storm Water Pollution Protection**

Allen Harim Foods, LLC does maintain an approved Storm Water Pollution Protection Plan; last update/review was December, 2011. There have not been any reportable spills in the past year, and all chemical and oil tank storage was found to be acceptable (no evidence of any spillage or problems), and most drum/tote storage is inside or under cover.

Outfall 002 & Outfall 003 are located just outside of the "Live Hold" Area (area where the birds remain in their transporting cages and on the flatbed trailer until processing is ready to move them into the production queue). Storm water runoff from the area around the live hold area flows to each of these two permitted storm water outfalls where it is captured in a sump and pumped to the "Anoxic Ponds" for treatment through the WWTP. The live hold area has a slanted concrete floor that contains two (2) collection sumps that pump to the Outfall 003 sump area (and ultimately to the "Anoxic Ponds"). Allen Harim Foods and the Department continue to actively work on the issues regarding the "Live Hold" area.

Outfall 004 is an area that basically collects all rain water runoff from the large parking lots and outside areas of the buildings. At the back of the property a concrete retaining wall with a weir utilized for storm water runoff flow control and to assure that any blown-around trash does not exit the outfall area.

### **Spill Prevention Control & Countermeasures Plan (SPCC)**

The Allen Harim Foods, LLC Harbeson, Delaware facility does maintain an SPCC Plan on site and the plan was last updated and reviewed in December, 2011. There have not been any reportable spills in the past year, and all chemical and oil tank storage was found to be acceptable (no evidence of any spillage or problems), and most drum storage is inside or under cover.

### **General**

It was noted that the facility has a beneficial reuse in place for approximately 20% of the treated wastewater from the WWTP. The reuse water is used for wash down of floors and various "Industrial Water" uses throughout the plant. The wash water is recovered and sent back through the WWTP for treatment.

There is a large lagoon in the back of the property that is available in case of an extreme emergency, where the WWTP can redirect the treated effluent to this lagoon. This lagoon currently has some rain water in it, but nothing is piped or directed to the lagoon . . . basically just "Rain From The Sky" and whatever rain water may runoff from the surrounding wooded area. When the water level in this lagoon becomes too high, the operating personnel have the ability to open a valve and send the water to the DAF influent pit and through the treatment process.

### **Violations/Observations/Recommendations**

- An inspection of the treated wastewater at the sample and discharge points showed that the effluent was clear, with no odor, no sheen, no foam, and no floating solids.
- Outfalls 002, 003, and 004 were clean and dry at the time of inspection.
- The Discharge Monitoring Report (DMR) for January 2013 was reviewed. All data was checked back to the raw laboratory data (in-house and contract lab – Envirocorp, Harrington, DE) and all calculations were verified. All testing methods, holding times, preservations, and container types were verified as conforming to 40 CFR Part 136.
- The inspection team requested a sample taken of the effluent (Outfall 001) at a point following chlorination, but just prior to dechlorination and at the designated sample point. A pH analysis was run on the discharge sample. The analysis was reported as 7.3, well within the permit limitation of 6.0 – 9.0 standard units. The pH procedures were reviewed with the operator and all buffers used were found to have acceptable expiration dates: 4.0 – 1/15; 7.0 – 5/14; 10.0 – 10/14. TRC analysis was run on both samples. The analysis was reported as 1.77 for the pre-dechlor sample and Non-Detect (ND) on the discharge sample. DPD packets used for TRC analysis had an expiration date of 5/17.
- The inspector found the housekeeping to be very acceptable.
- Sludge records and hauling permits were reviewed and found to be in compliance.
  - CDI hauling permit DE WH-013 valid 9/26/11-9/25/16
  - EOT hauling permit DE OH-601 valid 10/28/08-10/27/13
- In response to last year's CSI, the facility has been documenting rain events in the log book. When rain events occur, the staff checks the outfalls for discharges and checks the sump pumps to ensure they are working properly to avoid a discharge. In the past year when discharges have occurred, the facility has conducted the required sampling when it has been safe to do so.
- Operations & Maintenance Manuals have been completely reviewed and reorganized. Review/update was completed in December 2012 with management certification.
- SWPP and SPCC plans were reviewed: last review/update was December 2011 and inspections and training are up to date for both plans as well.

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A closing meeting was held with all parties involved in the compliance inspection, and a review of the preliminary findings was completed. Mr. Sause' was informed that he would be receiving a follow-up letter and a copy of the inspection report at a later date.

The inspector departed the facility at approximately 1330 hrs.



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