

**ALLEN FAMILY FOODS  
HARBESON, DELAWARE**

**STORM WATER PLAN  
FOR POLLUTION PREVENTION**

**OCTOBER, 1994  
REVISED : DECEMBER, 1996**



**CABE ASSOCIATES, INC.  
CONSULTING ENGINEERS**

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**144 S. GOVERNORS AVENUE  
P.O. BOX 877  
DOVER, DELAWARE 19903-0877  
302-674-9280**

**PROJECT NO. 122-028**

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## LIST OF EXHIBITS

Exhibit I-1	Location Map
Exhibit I-2	Site Plan
Exhibit I-3	Pollution Prevention Team
Exhibit III-1	Water Balance Calculations
Exhibit III-2	Visual Inspection Schedule
Exhibit III-3	Tank/Containment Inspection or Drainage Form
Exhibit III-4	Oil Transfer Inspection Form
Exhibit IV-1	Implementation Schedule
Exhibit IV-2	Employee Training Program Record

FACILITY MANAGEMENT CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I also certify that the Best Management Practices identified herein will be implemented, there are no floor drain connections to the storm water drainage system, and any illicit connections to the storm water system will be corrected according to the timetable identified in the implementation schedule. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for willful violations.

Michael R Moni  
Name  
Plant Manager  
Title  
1/3/77  
Date

PROFESSIONAL ENGINEER'S CERTIFICATION

I certify that I have reviewed this document and that, based on my knowledge of the facility, the comments, findings, recommendations and planned Best Management Practices are in accordance with good engineering practices.

A circular seal for a professional engineer in Delaware. The outer ring contains the text "JOHN BEETS" at the top, "REGISTERED" on the left, "DELAWARE" at the bottom, and "PROFESSIONAL ENGINEER" on the right. The center of the seal contains the number "No. 4256" and the date "12-12-98". A signature is written across the seal. Below the seal, the word "(SEAL)" is printed.  
John Beets  
Name  
No. 4256  
12-12-98  
Date  
(SEAL)



## I. BACKGROUND

### A. Purpose

Allen Family Foods currently holds NPDES Permit Number DE 0000299 (State Permit Number WPCC 3131C/76) for the discharge of treated wastewater into Beaverdam Creek. Item 9 of the special conditions in that permit requires a storm water plan (SWP) to be developed for the facility. This document has been prepared using a format identified by the Department of Natural Resources and Environmental Control (DNREC) in the Regulations Governing Storm Water Discharges Associated with Industrial Activity. This regulation establishes a general permit program for industrial storm water discharges.

### B. Site Description

The Allen Family Foods site, located in Harbeson, Delaware is a poultry processing facility at which live poultry is processed and packed for shipment. The site is located along Route 5 in Harbeson as shown on Exhibit I-1.

The facility is divided into six (6) drainage areas, each with a distinct storm water outfall. Storm water from the site is discharged to Beaverdam Creek which borders the western and northern drainage areas of the site. Exhibit I-2 shows each drainage area and the respective drainage patterns along with the location of Beaverdam Creek.

### C. Pollution Prevention Team

The regulations cited in Section I.A. require that a Pollution Prevention Team be formed for the facility. Designating a team who will implement the SWP serves several purposes. Naming the team members makes it clear that part of that person's job is to prevent storm water pollution. Establishing a team leader identifies a specific individual as a point of contact for those outside the facility who

may need to discuss aspects of the facility's SWP. The team at Allen Family Foods is made up of key people on site who are most familiar with the facility and its operations, people who can provide adequate structure and direction to the facility's storm water management program. The pollution prevention team concept is flexible and has been molded to conform to the resources and specific conditions at the facility. The designated team will be the driving force behind the implementation, maintenance and revision of the facility's SWP.

Areas of responsibilities for team members include initial site assessment, identification of pollutant sources and risks, decision making on appropriate Best Management Practices (BMPs), directing the actual implementation of the BMPs, and regular evaluations to measure the effectiveness of the plan. Details of these procedures are described throughout the SWP. To ensure that the SWP remains effective, the responsible individual for maintaining the SWP must be made aware of any changes that are made in plant operations. When changes are made that have an impact on the potential for discharging pollutants into storm water, the SWP shall be modified to reflect the new conditions.

The names, titles, office phone numbers and responsibilities of each team member are shown on Exhibit I-3.

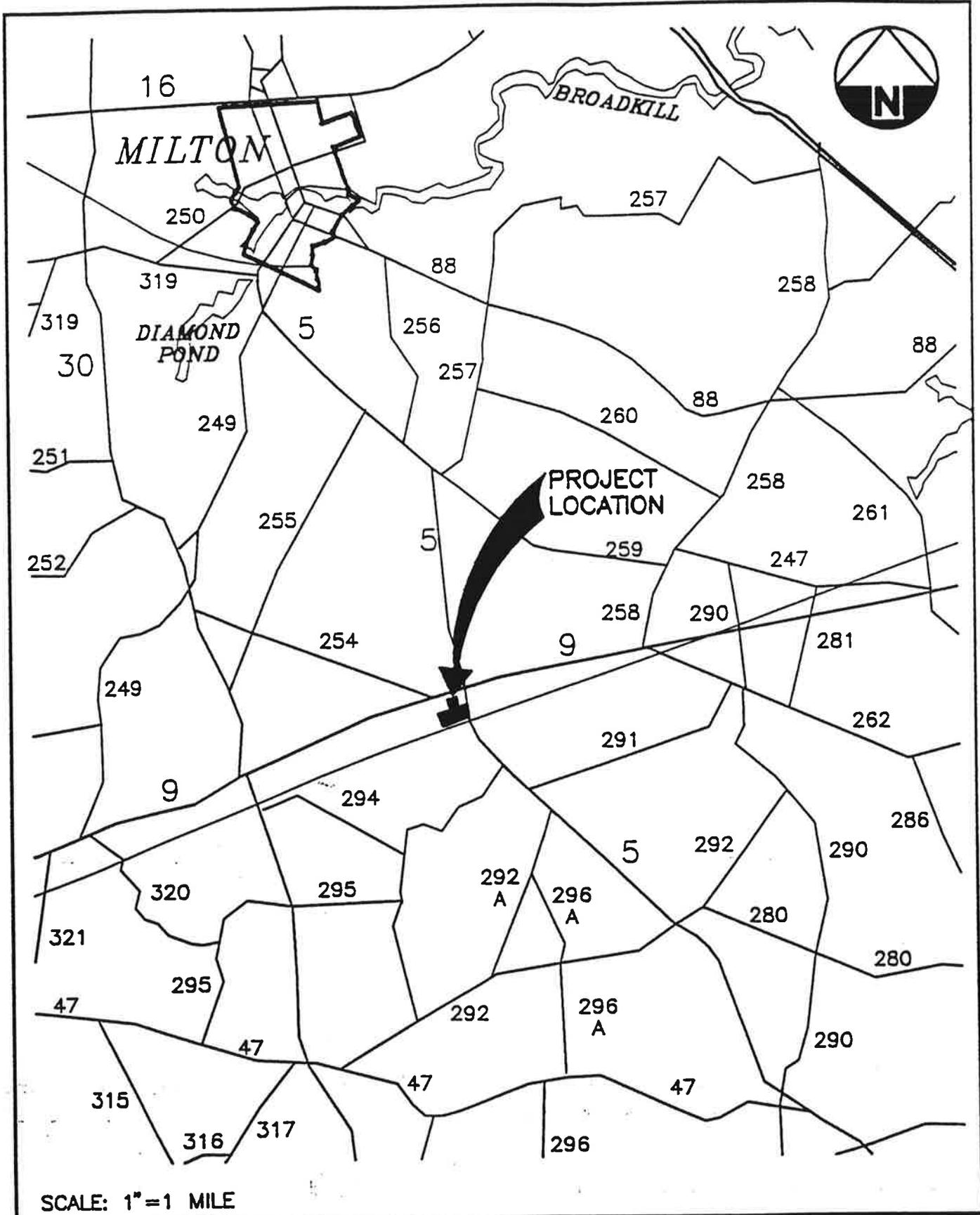
D. Water Priority Chemicals Requirements

There are special provisions in the facility's NPDES permit and in the general permit regulations for certain chemicals identified in Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA). Section 313 requires operators of facilities that handle toxic chemicals in amounts exceeding specified threshold levels to report to EPA and a designated state agency on an annual basis. DNREC has concluded that facilities that handle toxic chemicals have an increased potential to degrade the water quality of receiving streams. Therefore, DNREC has established specific control requirements in the general permit that apply to facilities that handle water priority chemicals. The additional requirements include

monitoring and providing of containment, drainage control and/or diversionary structures. Water priority chemicals include any of over 200 chemicals that have been specifically identified by EPA as especially toxic to water ecosystems. The complete list of Section 313 water priority chemicals is included as Attachment A. There are no water priority chemicals at the Allen Family Foods Harbeson site as of the date of this revised SWP.

Ammonia is a potential water priority chemical as identified in the Section 313 Water Priority Chemical List and is used at the Allen Family Foods site in the ammonia refrigeration system. As of the date of this revised document, the use of ammonia at the site does not satisfy the definition of a water priority chemical because it is not present at or above the Section 313 reporting threshold level. If ammonia usage exceeds the threshold level in the future and the facility is thus required to submit a Toxic Release Inventory to the EPA and DNREC, the facility is subject to requirements involving water priority chemicals identified in the Regulations Governing Storm Water Discharges Associated with Industrial Activity.

**EXHIBITS**



SCALE: 1"=1 MILE

<p><b>cabe</b>          122-028          OCTOBER, 1994          122A</p>	<p>LOCATION MAP          ALLENS FAMILY FOODS          HARBESON, DELAWARE</p>	<p>EXHIBIT          I-1</p>
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ALLEN FAMILY FOODS  
POLLUTION PREVENTION TEAM

Team Leader: George Reinsfelder Title: Environmental Coordinator  
Phone: 684-1640 Ext. 184

Responsibilities: Oversee activities of team - maintain papertrail - update plan as required - sampling program.

Members:

(1) Ben Taylor Title: Wastewater Supervisor  
Phone: 684-1640 Ext. 184

Responsibilities: Drainage Area 4&5 (Holding Shed) - Maintain sumps and pumps for area - assist team leader in absence.

(2) Jess Reed Title: Refrigeration Supervisor  
Phone: Page

Responsibilities: Oversee handling of compressor oils, boiler fuels, hydraulic oil and petroleum products from petroleum maintenance

(3) Milton Kaster Title: Transportation Div.  
Phone: 109 or Page

Responsibilities: Oversee transportation fleet and repairs and fuel use and deliveries

(4) Wyatt Jackson Title: Plant Engineer  
Phone: 146 or Page

Responsibilities: Oversee plant maintenance and operations of areas specific to potential product spills - particularly offal area.

(5) Jack Thomas Title: Plant Manager 2nd Shift  
Phone: 203 or Page

Responsibilities: Oversee all production on 2nd shift.

## II. SITE ASSESSMENT

### A. Drainage Areas and Outfalls

The facility has approximately 25.8 acres of industrial activity exposed to storm water and is divided into six (6) storm water drainage areas. Each of the drainage areas and respective drainage patterns are shown on Exhibit I-2. The drainage areas have been delineated based on visual observation and are described as follows:

#### 1. Drainage Area 1

Drainage Area 1 is located adjacent to Route 5 and the Conrail railroad and includes the southeast portion of the site. Storm water runoff from the area flows via sheet flow to four (4) catch basins located in series perpendicular to the vehicle access road. Storm water collected in the basins flows to the north and is discharged into Beaverdam Creek.

Areas of industrial activity within Drainage Area 1 include a paved employee parking lot and an unpaved truck and trailer parking lot in the northwest portion. Drainage Area 1 includes all vehicular traffic as the access road to the facility is bisected by its northern border. Further vehicular activities exist at the scale and scale house located at the entrance to the site. Vehicle refueling takes place at the scale.

#### 2. Drainage Area 2

Drainage Area 2 includes the southern portion of the processing buildings and is located adjacent to the Conrail railroad. Storm water runoff from the area flows via sheet flow to an area between the property line and railroad where it infiltrates and/or evaporates.

Industrial activity in Drainage Area 2 includes vent operations on the roofs of the processing building and outdoor hydraulic oil receivers.

3. Drainage Area 3

Drainage Area 3 includes the central portion of the site and is located between the processing buildings and the storm water lagoon. Storm water runoff from the area is discharged through two (2) 12" culverts into the existing pond. Storm water collected in the pond dissipates by evaporation.

Industrial activities located within Drainage Area 3 include offal loading, vehicle maintenance, vehicular traffic, final product distribution, ammonia refrigeration, truck washing, truck and trailer parking, wastewater pretreatment, and vehicle fueling. The majority of this drainage area is currently unpaved.

4. Drainage Area 4

Drainage Area 4 includes the west-central portion of the site. Storm water discharges are collected by a sump in the area's south western corner. Storm water runoff is discharged to wastewater pretreatment via a submersible pump at a capacity of 50 GPM. When a rain event results in runoff that exceeds this capacity, causing an overflow of the sump, storm water flows via sheet flow to Beaverdam Creek.

Industrial activities in Drainage Area 4 include wastewater pretreatment, plant maintenance, and vehicular traffic. The unpaved drainage area includes one-half of the live bird cooling and holding shed.

5. Drainage Area 5

Drainage Area 5 includes the southwestern portion of the site that is located to the west of Drainage Area 4. Storm water collects at a sump in the area's northwestern corner. Storm water runoff is discharged to wastewater pretreatment via a submersible pump with a capacity of 50 GPM. When a rain event results in runoff that exceeds this capacity, causing an overflow of the sump, storm water flows via sheet flow to Beaverdam Creek.

Industrial activities in the unpaved drainage area include vehicular traffic and one-half of the live bird cooling and holding shed.

6. Drainage Area 6

Drainage Area 6 includes the western and northern portion of the site adjacent to Beaverdam Creek, and the northeastern portion of the site located north of Drainage Area 1. Storm water from the area flows via sheet flow to Beaverdam Creek.

Industrial activities in this drainage area include wastewater pretreatment in the area's western portion and employee truck and trailing parking in its eastern portion.

7. Several areas are identified on Exhibit I-2 as draining to wastewater. These areas include the office area, shipping dock, offal area, live receiving area and a proposed trailer parking area. Since these areas do not discharge storm water directly to Beaverdam Creek, they are not discussed in the remaining sections of this plan.

B. Significant Materials Inventory

By definition, the term "significant material" includes, but is not limited to raw materials, fuels, materials such as solvents, detergents and plastic pellets, finished materials such as metallic products, raw materials used in food processing or production, hazardous substances designated under Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), any chemical the facility is required to report pursuant to Section 313 of Title III of the Superfund Amendments and Reauthorization Act (SARA), fertilizers, pesticides and waste products such as ashes, slag, and sludge that have a potential to be released with storm water discharges. If significant materials are exposed to storm water runoff, they may be carried to a receiving stream with the storm water flow. Therefore, identification of these materials helps to determine where a potential for contamination exists and is the first step in identifying the appropriate BMPs to address storm water pollution prevention. Significant material storage and handling areas exposed to storm water are identified on Exhibit I-2 and are described as follows:

1. Drainage Area 1

a. Petroleum Products

A diesel fuel tank is located adjacent to the facility's entrance. The tank is provided with secondary containment. Rain shields are installed on the containment system to minimize accumulation of storm water in the containment, thereby reducing the opportunity for product residues to comingle with storm water runoff. Petroleum drippings and residues result from vehicular traffic on the access road, employee parking lot and truck and trailer parking areas. The residues can be a source of storm water pollutants.

b. Poultry Byproducts

Significant materials include manure and feathers associated with the live haul and offal operations, and drippings from refrigerated box trailers.

2. Drainage Area 2

a. Petroleum Products

Hydraulic receivers are located on the roof of the processing building. The receivers contain oils used in the process machinery inside the building. Leaks and drippings from the receivers can be a source of storm water pollutants.

b. Poultry By-Products

Ventilation discharges from the processing building exhaust onto the roof and can discharge significant materials. Although no significant materials were noted around the ventilation equipment during development of the SWP, the potential remains.

3. Drainage Area 3

a. Petroleum Products

A No. 6 fuel oil tank is located within a secondary containment structure between the processing building and offal loading area. The tank is not provided with a roof, therefore allowing storm water to accumulate in the containment. The accumulated storm water must be periodically drained, thereby potentially releasing petroleum contaminants. Miscellaneous drummed oils and a waste oil tank are

### III. BEST MANAGEMENT PRACTICES

#### A. General Discussion of Best Management Practices

This chapter provides recommendations for Best Management Practices (BMPs) that have been identified as appropriate for preventing or minimizing pollutant loadings in storm water discharges from the site. The practices presented in this chapter are based on analysis of the potential pollutant sources identified in Chapter II. BMPs are a very broad class of measures and may include processes, procedures, schedules of activities, prohibitions on practices, or capital improvements to prevent or minimize storm water pollution.

The following categories of BMPs apply to Drainage Areas No. 1 through 6 at the facility:

- Capital Improvements
- Good Housekeeping
- Maintenance and Inspection
- Hazardous Substance and Oil Control
- Employee Training
- Record Keeping

Each of these practices is discussed in the remaining sections of this chapter. Employee training and record keeping are not given separate sections, but rather, are incorporated where appropriate throughout this chapter and discussed further in Chapter IV.

#### B. Capital Improvements

The majority of the significant materials at this facility are located on an unpaved area with frequent truck traffic within Drainage Areas 3 and 4. Housekeeping measures are difficult to implement in unpaved areas. Therefore, the following

recommendations and capital improvements should be completed to improve storm water management in these areas:

1. Pave the area between live receiving and the wastewater lagoons with concrete as shown on Exhibit I-2. The new paving should be sloped to drain into the live receiving area for collection and discharge of storm water to the wastewater treatment plant.
2. Pave Drainage Area 3 from the live receiving area to the shipping dock as shown on Exhibit I-2. The new paving should be sloped to the existing pipes penetrating the berm of the existing pond.
3. Storm water collected in the existing pond should be preferably disposed of via evaporation during favorable weather. A pipe with a shut-off valve should be installed to connect the existing pond to the emergency storage lagoon to allow discharge of collected storm water from the pond to the wastewater treatment plant during unfavorable weather conditions. The pond level should be maintained to allow a minimum of 10 inches of free board below the inlet pipe in order to contain a 25-year, 24-hour rainfall event. Additional storage volume of 0-6 inches (up to 16 inches total) is required for monthly rainfall. An evaporation/rainfall water balance is included as Exhibit III-1 to assist in management of the pond level.
4. Construct a designated area for parking refrigerated box trailers loaded with poultry products. The parking area should have a concrete swale located along the rear of the trailers to collect drippings and discharge them to the wastewater treatment plant.
5. Construct a designated truck and trailer washing area. The area should be located on a concrete paved surface with a collection system that discharges wash water to the wastewater treatment plant.

C. Good Housekeeping

A clean and orderly work area reduces the potential for accidental spills and minimizes significant materials that may be exposed to storm water. The primary responsibility for the housekeeping program rests with each plant employee. Oversight inspections should be performed by the pollution prevention team leader.

Housekeeping programs address specific measures aimed at reducing the probability of storm water mixing with pollutants. Such measures include maintenance of facility grounds, material storage practices, material inventory controls, and educational programs for employees.

1. Dry Clean-Up

Once the paving in Drainage Area 3 is complete, the area should be kept free of potential storm water pollutants. This can be accomplished by implementing dry clean-up activities to clean and properly dispose of significant materials before a rain event occurs. Dry clean-up can be accomplished by:

- a. Maintaining clean ground surfaces by promptly removing debris and waste from production areas. A mechanical sweeper can greatly assist in effectively removing the majority of significant materials.
- b. Pickup and dispose of garbage and waste material regularly.
- c. Utilize a common path for transportation of offal tote bins. A common path will consolidate contaminants and provide for easier cleaning and removal. By locating the path away from vehicle access lanes, the subsequent redistribution of fallen contaminants across the site via traffic can be minimized.

## 2. Drum Storage

Outdoor storage of drums poses a risk to storm water pollution if the contents are exposed to storm water. Exposure may occur from spills during transfers or when drum openings are not properly sealed. Drummed material that is spilled during a transfer process is a significant material not only from the spillage but from residual product that remains on the drum surface. Later during a storm event this material can wash off the drum and be carried to a storm water outfall. Both drums containing new product and used drums may contribute to storm water pollution when their openings are not properly plugged. Storm water can collect on the top of the drums and eventually allow release of significant materials.

Specific BMPs recommended for chemicals include the following:

- a. Empty drums should be stored upright on pallets with a maximum of 4 empty drums being stored on one (1) pallet at any one time. Drums should be disposed of within 90 days.
- b. Empty drums should be disposed of by any of the listed methods. The drums must be completely empty before disposal.
  1. Return drum to manufacturer, if possible.
  2. Cut up drum for scrap metal.
  3. Give drum to a drum reconditioner.
  4. Give drum to employees and others.
- c. An up-to-date inventory of materials stored outdoors (hazardous and non-hazardous) should be kept to keep material costs down, track how materials are stored and handled and identify which materials and activities pose the most risk to the environment. This will enable

personnel to make decisions regarding appropriate storage procedures and minimize potential exposure of materials to storm water.

- d. Assign the responsibility of the chemical inventory to a limited number of people who are trained to handle hazardous materials.

### 3. Educational Programs

Frequent and proper training of employees in good housekeeping techniques reduces the probability that chemicals or equipment will be mishandled. Motivating employees to reduce waste generation is another important pollution prevention technique. Practices for involving employees in good housekeeping are indicated below:

- a. Incorporate information sessions on good housekeeping practices into the facility's employee training program.
- b. Discuss good housekeeping at employee meetings.
- c. Publicize pollution prevention concepts through posters.
- d. Post bulletin boards with updated good housekeeping procedures, tips, and reminders.

#### D. Maintenance and Inspection

Regular visual inspections are an integral part of maintenance and housekeeping programs and are essential to insure that all of the elements of the SWP are in place and working properly. The purpose of this section is to identify visual inspection procedures that enable personnel to identify conditions that may result in pollution of storm water runoff. When such a condition is identified, maintenance will be necessary to correct this item. Employees carrying out the

visual inspection program must be properly trained, familiar with the storm water pollution prevention program and knowledgeable of proper record keeping and reporting procedures. Training and record keeping procedures are discussed further in Chapter IV.

The following areas should be inspected to ensure that processes and equipment are working well and that spills, leaks, and refuse will not be exposed to runoff.

1. Areas around all outside process equipment.
2. Areas where spills and leaks have occurred in the past.
3. Material storage areas (aboveground tanks, drum storage, raw material storage).
4. Material loading, unloading, and transfer areas.

Specific inspections and their scheduled frequency are detailed in the visual inspection checklist provided as Exhibit III-2. The checklist and schedule shall be updated as necessary to include future equipment and systems with potential for polluting storm water runoff. Checks for the following defects should be included in each visual inspection.

1. Corroded drums or drums without plugs or covers.
2. Corroded or damaged tanks, tank supports, and tank drain valves.
3. Corroded or leaking pipes.
4. Leaking or improperly closed valves and valve fittings.
5. Leaking pumps and/or hose connections.

6. Wind blown dry materials.

A Tank/Containment Inspection or Drainage Form as presented in Exhibit III-3 is used to document inspections involving tanks and secondary containments. Additionally, an Oil Transfer Inspection Form as presented in Exhibit III-4 is used to document operations and potential contamination from oil deliveries.

E. Hazardous Substance and Oil Control

Spills and leaks of hazardous substances and oil are one of the largest industrial sources of storm water pollutants. Therefore, the development of spill prevention and response procedures is a vital element of an effective storm water pollution prevention plan.

A Spill Prevention, Control, and Countermeasure Plan (SPCC) is required by 40 CFR 112 for facilities with greater than 660 gallons of oil stored in a single aboveground tank, or 1,320 gallons total aboveground oil storage. The special conditions of the facility's NPDES permit require the plan address hazardous materials as defined in 7 Del.C. Chapter 60, Section 6028 and the Reporting of a Discharge of a Pollutant or an Air Contaminant regulation. Accordingly, a SPCC plan has been developed for the facility and is incorporated herein by reference.

BMPs for spill prevention and response included in an SPCC plan are as follows:

1. Evaluation of tanks and secondary containment systems for prevention of releases.
2. Identification of potential spill areas.
3. Spill prevention measures including oil delivery procedures.

4. Spill response procedures and equipment to prevent further release and contain the released substance.
5. Notification procedures to the proper authorities in the event of a release.

**EXHIBITS**

## WATER BALANCE CALCULATIONS ALLEN FAMILY FOODS

### Rainfall Volumes for Runoff into Pond

MONTH	EVAPORATION (IN.)	PRECIPITATION (IN.)	RAINFALL INTO POND (GAL)	RAINFALL TO DRAINAGE AREA 3 (GAL)	EVAPORATION FROM POND (GAL)	MONTHLY RAINFALL VOLUME IN POND (GAL)
JAN	0.00	3.35	405104	225522	0	630626
FEB	0.00	3.02	365199	203306	0	568505
MAR	0.00	3.97	480079	267260	0	747339
APR	3.65	3.20	386965	215424	441382	161007
MAY	4.92	3.26	394221	219463	594959	18725
JUN	5.93	3.59	434127	241679	717095	-41290
JUL	6.26	4.02	486125	270626	757001	-249
AUG	5.42	5.43	656632	365548	655423	366757
SEP	3.91	3.51	424453	236293	472823	187923
OCT	2.56	3.48	420825	234274	309572	345526
NOV	1.73	3.29	397849	221483	209203	410128
DEC	0.00	3.59	434127	241679	0	675806
<b>TOTAL</b>	<b>34.38</b>	<b>43.71</b>	<b>5285705</b>	<b>2942557</b>	<b>4157459</b>	<b>4070803</b>

**NOTES:**

1. EVAP DATA OBTAINED FROM DAN LETHERS & THE GEORGETOWN WEATHER STATION
2. VALUES LISTED ARE 36 YEAR AVERAGES, WITH 0 ASSUMED DURING WINTER MONTHS
3. PRECIP DATA OBTAINED FROM "CLIMATOLOGICAL DATA ANNUAL SUMMARY, 1992"

### Required Storage for Rainfall Runoff into Pond

MONTH	REQUIRED STORAGE FOR MONTHLY PRECIPITATION		REQUIRED STORAGE FOR MONTHLY PRECIPITATION AND 25-YEAR, 24-HOUR DESIGN STORM	
	STORAGE (IN.)	STORAGE (GAL)	STORAGE (IN.)	STORAGE (GAL)
JAN	5.2	630626	15.2	1839893
FEB	4.7	568505	14.7	1777772
MAR	6.2	747339	16.2	1956606
APR	1.3	161007	11.3	1370274
MAY	0.2	18725	10.2	1227992
JUN	-0.3	-41290	10.0	1209267
JUL	-0.0	-249	10.0	1209017
AUG	3.0	366757	13.0	1576024
SEP	1.6	187923	11.6	1397189
OCT	2.9	345526	12.9	1554793
NOV	3.4	410128	13.4	1619395
DEC	5.6	675806	15.6	1885072
	<b>33.7</b>	<b>4070803</b>		

NOTE: 10 INCHES OF STORAGE VOLUME BELOW PIPE INLET TO POND REQUIRED FOR STORAGE OF 25-YEAR, 24-HOUR STORM

**STORM WATER POLLUTION PREVENTION PLAN  
VISUAL INSPECTION SCHEDULE  
ALLEN FAMILY FOODS**

	D	W	A
<b>OVERALL PLANT OUTSIDE AREAS</b>			
INSPECT FOR SPILLED MATERIALS, PROMPTLY CLEAN UP	X		
INSPECT FOR BARE SPOTS, SOIL EROSION		X	
INSPECT CATCH BASINS, DRAINS FOR DEBRIS, CLOGGING	X		
AREAS WHERE SPILLS HAVE OCCURRED IN THE PAST		X	
MATERIAL STORAGE AREAS	X		
MATERIAL LOADING, UNLOADING, AND TRANSFER AREAS	X		
CORRODED DRUMS OR DRUMS WITHOUT PLUGS OR COVERS		X	
CORRODED OR DAMAGED TANKS, TANK SUPPORTS, AND TANK DRAIN VALVES		X	
CORRODED OR LEAKING PIPES		X	
LEAKING OR IMPROPERLY CLOSED VALVES AND VALVE FITTINGS		X	
LEAKING PUMPS OR HOSE CONNECTIONS		X	
WIND BLOWN DRY MATERIALS		X	
<b>ABOVE GROUND STORAGE TANKS</b>			
INSPECT CONTAINMENT STRUCTURE FOR CRACKS, DAMAGE AND SIGNS OF LEAKAGE		X	
INSPECT CONTAINMENT DRAIN VALVE		X	
INSPECT TANK FOR SIGNS OF LEAKAGE		X	
INSPECT VALVES, FILL LINES, VENTS		X	
<b>DRUM AND MATERIAL STORAGE AREAS</b>			
INSPECT DRUMS AND OTHER CONTAINERS FOR SIGNS OF LEAKAGE OR CORROSION		X	
INSPECT FOR SIGNS OF SPILLAGE ON FLOORS OR GROUND	X		
INSPECT DRAINAGE FACILITIES FOR BLOCKAGE OR ACCUMULATION OF DEBRIS		X	
INSPECT EMPTY DRUM ACCUMULATION AREAS TO INSURE OPENINGS ARE PLUGGED		X	
INSPECT DRUM STORAGE AREAS TO INSURE DRUMS ARE STORED OFF THE GROUND		X	
<b>MATERIAL LOADING/ UNLOADING AREAS</b>			
INSPECT FOR SIGNS OF SPILLAGE ON FLOORS OR GROUND	X		
INSPECT DRAINAGE FACILITIES FOR BLOCKAGE OR ACCUMULATION OF DEBRIS		X	
INSPECT CURBING OR OTHER STORM WATER DIVERSION STRUCTURES FOR DAMAGE		X	
<b>LIFT STATION DRAINAGE AREA 4</b>			
INSPECT LEVEL CONTROLS. CLEAN AS NECESSARY		X	
INSPECT WET WELL FOR DEBRIS		X	
INSPECT POWER CABLES FOR CUTS, NICKS		X	

D-DAILY W-WEEKLY A-ANNUALLY

**STORM WATER POLLUTION PREVENTION PLAN  
VISUAL INSPECTION SCHEDULE  
ALLEN FAMILY FOODS**

	D	W	A
<b>LIFT STATION DRAINAGE AREA 5</b>			
INSPECT LEVEL CONTROLS. CLEAN AS NECESSARY		X	
INSPECT WET WELL FOR DEBRIS		X	
INSPECT POWER CABLES FOR CUTS, NICKS		X	
<b>SECTION 313 WATER PRIORITY CHEMICALS (CHLORINE)</b>			
INSPECT FOR LEAKS THAT COULD LEAD TO DISCHARGES	X		
INSPECT FOR CONDITIONS THAT COULD LEAD TO DIRECT CONTACT OF STORM WATER WITH RAW, INTERMEDIATE OR WASTE MATERIALS	X		
INSPECT ALL STORAGE, HANDLING AND PROCESS EQUIPMENT FOR LEAKS, CORROSION, FOUNDATION FAILURE	X		
<b>PETROLEUM PRODUCTS</b>			
INSPECT TANKS AND HYDRAULIC OIL RECEIVERS FOR SIGNS OF LEAKAGE		X	
INSPECT VALVES, FILL LINES, VENTS FOR SIGNS OF LEAKAGE		X	
INSPECT VEHICLE FUELING AREAS FOR SIGNS OF SPILLAGE	X		
INSPECT TANKS FOR STRUCTURAL INTEGRITY			X
INSPECT WASTE OIL STORAGE AREAS FOR SIGNS OF LEAKAGE OR SPILLAGE	X		
<b>POULTRY BYPRODUCTS</b>			
INSPECT OFFAL TRAFFIC AREAS FOR SIGNS OF SPILLAGE	X		
INSPECT TO INSURE DRY CLEAN-UP IS CONDUCTED	X		
INSPECT TRAILER PARKING AREA DRAINS FOR BLOCKAGE	X		
INSPECT DRAINAGE PIPE TO EXISTING POND FOR BLOCKAGE	X		
INSPECT EXISTING POND WATER LEVEL	X		

D-DAILY W-WEEKLY A-ANNUALLY

ALLEN FAMILY FOODS

TANK / CONTAINMENT INSPECTION or DRAINAGE FORM

DATE: \_\_\_\_\_

TIME: \_\_\_\_\_

STORAGE LOCATION: \_\_\_\_\_

CONTENTS OF VESSEL: \_\_\_\_\_

INSPECTORS NAME: \_\_\_\_\_

Is there any signs of leakage or seepage on the surface of the tank, or on the ground around / below the tank? \_\_\_\_\_

IF YES describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Is there any storm water in the containment? \_\_\_\_\_

If YES, could it escape to the environment? \_\_\_\_\_

If YES, describe the disposal methods used to clean out the containment area! \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

If BOTH tank and containment are in satisfactory condition, return this form to the Environmental Coordinator.

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

DATE: \_\_\_\_\_

ALLEN FAMILY FOODS  
OIL TRANSFER INSPECTION FORM

DATE: \_\_\_\_\_

TIME: \_\_\_\_\_

Type of Oil Delivered or Picked up? \_\_\_\_\_

Quantity Delivered or Picked up? \_\_\_\_\_

Quantity in Inventory? \_\_\_\_\_

Is there any sign of leakage or spillage on the surface  
of the tank, in the containment, or on the ground? \_\_\_\_\_

If YES, Describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Are valves, vents, lines, etc. in working order? \_\_\_\_\_

If NO, Describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Drivers signiture \_\_\_\_\_

Allens signiture \_\_\_\_\_

This form should be returned to allens personnel prior to  
departure

# **COMPLIANCE RESPONSIBILITIES**

## **CHAPTER IV**

#### IV. COMPLIANCE RESPONSIBILITIES

##### A. Implementation of Best Management Practices

The Best Management Practices specified in the previous chapter are recommended for implementation. The four (4) essential elements to successful implementation are:

1. Development of a detailed implementation schedule.
2. Assignment of specific individuals with responsibility for implementing aspects of the plan and/or monitoring their implementation.
3. Management approval of implementation schedule and strategy.
4. Regularly scheduled implementation progress reports to management.

A time table is being developed for implementation of BMPs. Exhibit IV-1 shows each proposed practice and provides an outline for Allen's use in scheduling implementation. The certification signature of the management representative in the beginning of this document signifies commitment to scheduling implementation of proposed improvements. During construction of improvements, the pollution prevention team leader should submit an implementation progress report to management on a monthly basis.

##### B. Employee Training

Employee training is essential to the effective implementation of the SWP. The goal of the training program is to teach personnel at all levels of responsibility the components and goals of the SWP. Properly trained employees are more capable of preventing spills, responding safely and effectively to accidents, and recognizing and minimizing potential pollutant

sources of storm water. Pollution prevention program training must take place annually at a minimum and include the following topics:

1. Spill Prevention and Response

The primary document that may be used for this purpose is the SPCC. An SPCC plan provides detail to enable personnel to prevent and/or respond to the types of spill expected to be encountered.

2. Good Housekeeping

Facility personnel shall receive training on how to maintain a clean and orderly work environment and how to carry out the adopted procedures of the housekeeping program for their specific area. Formal training sessions should be scheduled for all new employees. Ongoing training should be implemented through routine employee meetings. The good housekeeping training programs should emphasize the following points.

- a. Promptly cleanup spilled materials and document on the dry clean-up log.
- b. Identify places where good housekeeping and spill response equipment is located.
- c. Discuss updated procedures and report on the progress of practicing good housekeeping.
- d. Provide instruction on securing drums and containers and frequently checking for leaks and spills.

C. Annual Site Compliance Evaluation

The pollution prevention team shall be responsible for conducting annual site compliance evaluations. The evaluations shall be conducted by team members and/or individuals specifically designated by the team. All persons who

conduct compliance evaluations shall be familiar with the facility's operations and the SWP goals and requirements. Furthermore, inspectors shall have the ability to make necessary management decisions or have direct access to management.

The annual compliance evaluation shall provide the basis for evaluating the overall effectiveness of the SWP. The specific goals of the evaluation shall be to verify that the description of potential pollutant sources contained in the plan is accurate, that the plan drainage map is accurate or has been updated to reflect current conditions, and that the controls identified in the plan to reduce pollutants in storm water discharges are accurately identified, in place, and working. The evaluation shall also identify where new controls are needed so that they may be implemented and incorporated into the SWP.

In conducting annual site compliance evaluations, the pollution prevention team shall:

1. Review the SWP and develop a list of those items that are part of material handling, storage and transfer areas covered by the plan.
2. List all equipment and containment in these areas covered by the plan.
3. Review facility operations for the past year to determine if any areas were modified so as to require modification of the SWP.
4. Inspect storm water drainage areas for evidence of pollutants entering the drainage system.
5. Inspect storm water outfalls for the presence of non-storm water discharges.
6. Evaluate the effectiveness of measures to reduce pollutant loadings and whether additional measures are needed.
7. Observe structural measures, sediment controls and other storm water BMPs to insure proper operation.
8. Inspect any equipment needed to implement the plan such as spill response equipment.

9. Revise the SWP as appropriate. Revisions shall include, but not be limited to, changes and additions to potential pollutant source descriptions and descriptions of BMPs. Revisions shall be completed within two (2) weeks of the inspection.
10. Implement any changes to the SWP within 12 weeks of the inspection. Where capital improvements are necessary, plant management shall establish an implementation schedule similar to Exhibit IV-1 for completing the improvements. This schedule shall be included as part of the revised SWP.
11. Prepare a report summarizing inspection results and follow-up actions, the date of inspection, and personnel who conducted the inspection. All incidents of non-compliance shall be documented in the inspection report. Where there are no incidents of non-compliance, the inspection report shall contain a certification that the facility is in compliance with the plan. The report shall be signed by the team leader and maintained with the pollution prevention plan in the office of the pollution prevention team leader.

D. Plan Revisions

For the SWP to be effective, it must accurately represent facility features and operations. When there are changes in design, construction, operation or maintenance and that change will have a significant impact on the potential for discharging pollutants in the storm water, the SWP shall be modified to reflect the changes in new conditions. The SWP shall be revised to include additional or alternative BMPs. Should inspection reveal that existing controls are not effective in controlling storm water contamination, the pollution prevention team shall be responsible for verifying the applicability of the existing SWP and for the preparation of necessary revisions.

Upon notification from DNREC that the SWP does not adequately address the requirements of this permit, the permittee shall amend the SWP and submit

these amendments to DNREC within 30 days of such notification. The notification from DNREC shall list or describe the deficiencies of the SWP. DNREC may grant additional time for amending a SWP at their discretion.

If the use of ammonia at the site changes such that ammonia satisfies the definition of a water priority chemical as discussed in Chapter I, the SWP should be revised to reflect applicable requirements.

E. Record Keeping

Keeping records of and reporting events that occur on site is an effective way of tracking the progress of the pollution prevention efforts. Analyzing records of past spills for example can provide useful information for developing improved BMPs to prevent future spills of the same kind. Record keeping and internal reporting represent good operating practices because they increase the effectiveness of the SWP.

The pollution prevention team shall compile and maintain records as described herein. Such records shall be maintained in the office of the pollution prevention team leader for a period of five (5) years.

1. Spills, Leaks and Other Discharges

All reporting of release incidents should be conducted and documented according to the format of the release report forms developed for Allen Family Foods. These forms are part of a spill release notification system which also includes a wall mounted Spill Notification Chart, originals of the Release Report forms (Form 1 and Form 2) and a Reportable Quantities list for chemicals. The Release Reporting system is maintained in the Environmental Coordinator's office. The system identifies individuals responsible for release reporting. It is very important that release reporting to the appropriate agencies be done as

soon as the release is discovered even if it is necessary to later follow-up with the required data identified in Form 1.

2. Inspections and Maintenance Activities

A record keeping system shall be implemented to document all inspections including visual inspections of the housekeeping program, tank/containment inspections, oil transfer inspections, and annual site compliance inspections. Exhibit III-3 and III-4 can be used to document tank/containment and oil transfer inspections, respectively. Documenting all inspections whether routine or detailed is a good preventive maintenance technique because analysis of inspection records allows early detection of potential problems. Record keeping also helps devise improvements in the BMP program after inspection records have been analyzed.

3. Implementation Schedule

As described in Section A of this chapter, Exhibit IV-1 should be completed, made available to appropriate management personnel with the responsibility of overseeing the storm water management program and filed along with other storm water plan documentation.

4. Training Program

A training program record shall be maintained to document all training related to the SWP. A sample record form is provided as Exhibit IV-2 and shall be maintained by the Pollution Prevention Team Leader. The Pollution Prevention Team shall also regularly evaluate the effectiveness of the training efforts.

## 5. SWP Revisions

As described in Section D of this chapter, a revised storm water plan will periodically be necessary. The revised SWP should be dated and incorporated into the facility's storm water management program as all previous versions of the SWP.

**EXHIBITS**

**STORM WATER POLLUTION PREVENTION PLAN  
IMPLEMENTATION SCHEDULE  
ALLEN FAMILY FOODS**

ACTIVITY DESCRIPTION	SCHEDULED COMPLETION DATE	RESPONSIBLE PERSON
<b>CAPITAL IMPROVEMENTS</b>		
1 PAVE LIVE RECEIVING AREA	AS SCHEDULED	
2 PAVE FROM LIVE RECEIVING TO SHIPPING DOCK	AS SCHEDULED	
3 INSTALL PIPE CONNECTING EXISTING POND TO EMERGENCY STORAGE LAGOON	AS SCHEDULED	
4 CONSTRUCT TRAILER PARKING FACILITY	AS SCHEDULED	
5 CONSTRUCT TRUCK AND TRAILER WASHING AREA	AS SCHEDULED	
<b>GOOD HOUSEKEEPING</b>		
1 IMPLEMENT DRY CLEAN-UP PROGRAM	AS SCHEDULED	
2 IMPLEMENT DRUM STORAGE BMP'S	AS SCHEDULED	
3 IMPLEMENT EDUCATIONAL PROGRAMS	AS SCHEDULED	
<b>MAINTENANCE AND INSPECTION</b>		
1 IMPLEMENT VISUAL INSPECTION PROGRAM	AS SCHEDULED	
<b>HAZARDOUS SUBSTANCE AND OIL CONTROL</b>		
1 IMPLEMENT SPPC PLAN	AS SCHEDULED	

STORM WATER POLLUTION PREVENTION PLAN  
EMPLOYEE TRAINING PROGRAM RECORD

<u>DATE</u>	<u>TRAINING PROGRAM/TOPIC</u>	<u>ATTENDEES</u> <u>(ATTACH LIST AS NEEDED)</u>
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# ATTACHMENTS

**SECTION 313 WATER PRIORITY CHEMICALS**

**ATTACHMENT A**

## SECTION 313 WATER PRIORITY CHEMICALS

CAS Number	Common Name
75-07-0	Acetaldehyde
107-02-8	Acrolein
107-13-1	Acrylonitrile
309-00-2	Aldrin[1,4:5,8-Dimethanonaphthalene, 1,2,3,4,10,10-hexachloro-1,4,4a,5,8,8a-hexahydro-(1.alpha.,4a.beta.,5.alpha.,8.alpha.,8a.beta.)-]
107-05-1	Allyl Chloride
7429-90-5	Aluminum (fume or dust)
7664-41-7	Ammonia Nitrogen
120-12-7	Anthracene
7440-36-0	Antimony
7647189	Antimony pentachloride
28300745	Antimony potassium tartrate
7789619	Antimony tribromide
1002-25919	Antimony trichloride
7783564	Antimony trifluoride
1309644	Antimony trioxide
7440-38-2	Arsenic
1303328	Arsenic disulfide
1303282	Arsenic pentoxide
7784341	Arsenic trichloride
1327533	Arsenic trioxide
1303339	Arsenic trisulfide
1332-21-4	Asbestos (friable)
542621	Barium cyanide
71-43-2	Benzene
92-87-5	Benzidine
100470	Benzonitrile

## SECTION 313 WATER PRIORITY CHEMICALS

CAS Number	Common Name
100-44-7	Benzyl chloride
7440-41-7	Beryllium
7787475	Beryllium chloride
7787497	Beryllium fluoride
7787555	Beryllium nitrate
111-44-4	Bis(2-chloroethyl) ether
75-25-2-7	Bromoform
74-83-9	Bromomethane (Methyl bromide)
85-68-7	Butyl benzyl phthalate
7440-43-9	Cadmium
543908	Cadmium acetate
7789426	Cadmium bromide
10108642	Cadmium chloride
7778441	Calcium arsenate
52740166	Calcium arsenite
13765190	Calcium chromate
592018	Calcium cyanide
63-25-2	Carcaryl [1-Naphthalenol, methycarbamate]
75-15-0	Carbon disulfide
56-23-5	Carbon tetrachloride
57-74-9	Chlordane [4,7-Methanoindan.1,2,4,5,6,7,8,8-octachloro-2,3,3a,4,7,7a-hexahydro-]
7782-50-5	Chlorine
59-50-7	Chloro-4-methyl-3-phenol p-Chloro-m-cresol
108-90-7	Chlorobenzene
75-00-3	Chloroethane (Ethyl chloride)
67-66-3	Chloroform

## SECTION 313 WATER PRIORITY CHEMICALS

CAS Number	Common Name
74-87-3	Chloromethane (Methyl chloride)
95-57-8	2-Chlorophenol
106-48-9	4-Chlorophenol
1066304	Chromic acetate
11115745	Chromic acid
10101538	Chromic sulfate
7440-47-3	Chromium
1308-14-1	Chromium (Tri)
10049055	Chromous chloride
7789437	Cobaltous bromide
544183	Cobaltous formate
14017415	Cobaltous sulfamate
7440-50-8	Copper
108-39-4	m-Cresol
9548-7	o-Cresol
106-44-5	p-Cresol
1319-77-3	Cresol (mixed isomers)
142712	Cupric acetate
12002038	Cupric acetoarsenite
7447394	Cupric chloride
3251238	Cupric nitrate
5893663	Cupric oxalate
7758987	Cupric sulfate
10380297	Cupric sulfate, ammoniated
815827	Cupric tartrate
57-12-5	Cyanide
110-82-7	Cyclohexane

## SECTION 313 WATER PRIORITY CHEMICALS

CAS Number	Common Name
94-75-7	2,4-D [Acetic acid, (2,4-dichlorophenoxy)-]
106-93-4	1,2-Dibromoethane (Ethylene dibromide)
84-74-2	Dibutyl phthalate
25321-22-6	Dichlorobenzene (mixed isomers)
95-50-1	1,2-Dichlorobenzene
541-73-1	1,3-Dichlorobenzene
106-46-7	1,4-Dichlorobenzene
91-94-1	3,3'-Dichlorobenzidine
75-27-4	Dichlorobromomethane
107-06-2	1,2-Dichloroethane (Ethylene dichloride)
540-59-0	1,2-Dichloroethylene
120-83-2	2,4-Dichlorophenol
78-87-5	1,2-Dichloropropane
542-75-6	1,3-Dichloropropylene
62-73-7	Dichlorvos [Phosphoric acid, 2,2-dichloroethenyl dimethyl ester]
115-32-2	Dicofol [Benzenemethanol, 4-chloro-.alpha.-(4-chlorophenyl)-.alpha.-(trichloromethyl)]
84-66-2	Diethyl phthalate
105-67-9	2,4-Dimethylphenol
131-11-3	Dimethyl phthalate
534-52-1	4,6-Dinitro-o-cresol
51-28-5	2,4-Dinitrophenol
121-14-2	2,4-Dinitrotoluene
606-20-2	2,6-Dinitrotoluene
117-84-0	n-Diocril phthalate
122-66-7	1,2-Diphenylhydrazine (Hydrazobenzene)
100-41-4	Ethylbenzene

## SECTION 313 WATER PRIORITY CHEMICALS

CAS Number	Common Name
106934	Ethylene dibromide
76-44-8	Heptachlor [1,4,5,6,7,8,8-Heltachloro-3a,4,7,7a-tetrahydro-4,7-methano-1H-indene]
118-74-1	Hexachlorobenzene
87-68-3	Hexachloro-1,3-butadiene
77-47-4	Hexachlorocyclopentadiene
67-72-1	Hexachloroethane
7647-01-0	Hydrochloric acid
74-90-8	Hydrogen cyanide
7664-39-3	Hydrogen fluoride
7439-92-1	Lead
301042	Lead acetate
7784409	Lead arsenate
76452526	" "
10102484	" "
7758954	Lead chloride
13814965	Lead fluoborate
7783462	Lead fluoride
10101630	Lead iodide
10099748	Lead nitrate
7428480	Lead stearate
1072351	" "
52652592	" "
7446142	Lead sulfate
1314870	Lead sulfide
592870	Lead thiocyanate
58-89-9	Lindane [Cyclohexane, 1,2,3,4,5,6-hexachloro-(1.alpha.,3.beta.,4.alpha.,5.alpha.,6.beta.)-]

## SECTION 313 WATER PRIORITY CHEMICALS

CAS Number	Common Name
108-31-6	Maleic anhydride
592041	Mercuric cyanide
10045940	Mercuric nitrate
7783359	Mercuric sulfate
592858	Mercuric thiocyanate
7782867	Mercurous nitrate
7439-97-6	Mercury
72-43-5	Methoxychlor [Benzene, 1,1'-(2,2,2-trichloroethylidene)bis[4-methoxy-]]
8-62-6	Methyl methacrylate
91-20-3	Naphthalene
7440-02-0	Nickel
15699180	Nickel ammonium sulfate
37211055	Nickel chloride
7718549	" "
12054487	Nickel hydroxide
14216752	Nickel nitrate
7786814	Nickel sulfate
7697-37-2	Nitric acid
98-95-3	Nitrobenzene
88-75-5	2-Nitrophenol
100-02-7	4-Nitrophenol
62-75-9	N-Nitrosodimethylamine
86-30-6	N-Nitrosodiphenylamine
621-64-7	N-Nitrosodi-n-propylamine
56-38-2	Parathion [Phosphorothioic acid, O,O-diethyl-O-(4-nitrophenyl) ester]
87-86-5	Pentachlorophenol (PCP)
108-95-2	Phenol

## SECTION 313 WATER PRIORITY CHEMICALS

CAS Number	Common Name
7664-38-2	Phosphoric acid
7723-14-0	Phosphorus (yellow or white)
1336-36-3	Polychlorinated biphenyls (PCBs)
7784410	Potassium arsenate
10124502	Potassium arsenite
7778509	Potassium bichromate
7789006	Potassium chromate
151508	Potassium cyanide
91-22-5	Quinoline
7782-49-2	Selenium
7446084	Selenium oxide
7440-22-4	Silver
7761888	Silver nitrate
7631892	Sodium arsenate
7784465	Sodium arsenite
10588019	Sodium bichromate
7775113	Sodium chromate
143339	Sodium cyanide
10102188	Sodium selenite
7782823	" "
7789062	Strontium chromate
100-42-5	Styrene
7664-93-9	Sulfuric acid
79-34-5	1,1,2,2-Tetrachloroethane
127-18-4	Tetrachloroethylene (Perchloroethylene)
935-95-5	2,3,5,6-Tetrachlorophenol
78002	Tetraethyl lead

## SECTION 313 WATER PRIORITY CHEMICALS

CAS Number	Common Name
7440-28-0	Thallium
10031591	Thallium sulfate
108-88-33	Toluene
8001-35-2	Toxaphene
52-68-6	Trichlorfon [Phosphonic acid, (2,2,2-trichloro-2-hydroxyethyl)-dimethylester]
120-82-1	1,2,4-Trichlorobenzene
71-55-6	1,1,1-Trichloroethane (Methyl chloroform)
79-00-5	1,1,2-Trichloroethane
79-01-6	Trichloroethylene
95-95-4	2,4,5-Trichlorophenol
88-06-2	2,4,6-Trichlorophenol
7440-62-2	Vanadium (fume or dust)
108-05-4	Vinyl acetate
75-01-4	Vinyl chloride
75-35-4	Vinylidene chloride
108-38-3	m-Xylene
95-47-6	o-Xylene
106-42-3	p-Xylene
1330-20-7	Xylene (mixed isomers)
7440-66-6	Zinc (fume or dust)
557346	Zinc acetate
14639975	Zinc ammonium chloride
14639986	" " "
52628258	" " "
1332076	Zinc borate
7699458	Zinc bromide
3486359	Zinc carbonate
7646857	Zinc chloride



**OUTFALL 002 SAMPLING RESULTS**

**ATTACHMENT B**

# Envirocorp, Inc.

14 COMMERCE STREET  
HARRINGTON, DELAWARE 19952

(302) 398-4313  
FAX (302) 398-4312

10/11/96

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

Attention: Mr. George Reinsfelder

Lab I.D.

Description

82091

002 stormwater grab @ 0730-hrs on 9/11/96 by client:  
received 9/11/96 by RKW of ENVIROCORP, INC.

<u>Parameter</u>	<u>Units</u>	<u>Results</u>	<u>Test Date</u>	<u>Time</u>	<u>Init</u>	<u>Meth</u>
BOD5	mg/L	30.2	09/11/96	1400	RKW	405.
Total Susp. Solids	mg/L	590	09/13/96	1530	BJM	160.
**TKN	mg/L	6.44	09/13/96	1057	EHK	351.
COD	mg/L	190	09/17/96	1650	JAY	410.
* Total Phosphorus as P	mg/L	2.78	09/12/96	1555	EHK	365.
***Nitrate+Nitrite as N	mg/L	2.22	09/12/96	842	EHK	353.
Fecal Coliform	#/100 mls	400000	09/11/96	1325	JAY	909C
Oil & Grease	mg/L	11.0	09/12/96	1300	EHK	413.
***Nitrite as N	mg/L	0.230	10/10/96	1725	EHK	354.

\*\* A spiked duplicate sample yielded 109.52% recovery

\* Analyzed in duplicate with a relative standard deviation of +/- 0.93%

\*\*\*Analyzed in duplicate with a relative standard deviation of +/- 1.24%

\*\*\*A spiked duplicate sample yielded 101.24% recovery

\*\*\*Analyzed in duplicate with a relative standard deviation of +/- 2.40%

\*\*\*A spiked duplicate sample yielded 100.86% recovery

  
Supervising Analyst

\* Nitrite as N was added at clients request.