

**Moore Amber N. (DNREC)**

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**From:** Moore Amber N. (DNREC)  
**Sent:** Monday, April 16, 2007 11:15 AM  
**To:** 'Lou Ann Parson'  
**Cc:** Tom Brinson; mikesauce@allenfamilyfoods.com  
**Subject:** RE: AI-130-02 Allen Family Foods, Inc. Harbeson  
**Attachments:** anm07174.doc

Attached, please find my response to your submittal.  
Thank you.

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**From:** Lou Ann Parson [mailto:[laparson@bpenvironmental.net](mailto:laparson@bpenvironmental.net)]  
**Sent:** Friday, April 13, 2007 2:34 PM  
**To:** Moore Amber N. (DNREC)  
**Cc:** Tom Brinson; mikesauce@allenfamilyfoods.com  
**Subject:** AI-130-02 Allen Family Foods, Inc. Harbeson

Amber,

Attached please the letter report of Allen Family Foods, Inc. Harbeson, DE facility.

Thank you for your patience with this response.

LA

Lou Ann Parson, President  
BP Environmental, Inc.  
P: (410) 745-0919/(302) 629-6505  
F: (410) 745-0922/(302) 629-6722



**BP**Environmental, Inc.

**Moore Amber N. (DNREC)**

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**From:** Moore Amber N. (DNREC)  
**Sent:** Monday, April 16, 2007 10:54 AM  
**To:** McCloskey Sr. Allen V. (DNREC)  
**Cc:** Davis Glenn F. (DNREC)  
**Subject:** FW: AL-130-02 Allen Family Foods, Inc. Harbeson  
**Attachments:** 04.09.07.AL-130-02.response.pdf; Harbeson; anm06504.doc

I am forwarding Allen Family Foods' response to my October 2, 2006 letter.

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**From:** Lou Ann Parson [mailto:[laparson@bpenvironmental.net](mailto:laparson@bpenvironmental.net)]  
**Sent:** Friday, April 13, 2007 2:34 PM  
**To:** Moore Amber N. (DNREC)  
**Cc:** Tom Brinson; [mikesauce@allenfamilyfoods.com](mailto:mikesauce@allenfamilyfoods.com)  
**Subject:** AL-130-02 Allen Family Foods, Inc. Harbeson

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**BP**Environmental, Inc.

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[www.bpenvironmental.net](http://www.bpenvironmental.net)

April 9, 2007

Ms. Amber Moore  
DNREC  
89 Kings Highway  
Dover, DE 19901

RE: Allen Family Foods, Inc.  
Route 5  
Harbeson, DE  
A1-130-02

Dear Ms. Moore,

BP Environmental, Inc. (BPE), at the request of our client, Allen Family Foods, Inc. (Allens) performed an inspection at their processing plant in Harbeson, Delaware. This request was in response to a letter from your office concerning the discharge to outfalls 002 and 003. Allens had already put into place many procedures and training prior to my visit. This letter will summarize Allen's enhancement of the stormwater program.

On January 12, 2007, while on site, BPE also met with on site staff and Pollution Prevention Team.

Allens has made the following changes to their facility to reduce the risk of discharges at Outfalls 002 and 003:

- Pumps: New automatic float switches have been installed on pumps. The pumps at outfall 002 and outfall 003 now function on a continuous basis with an on/off float. The pumps have been serviced and new rotating assembly has been installed. The pumps handled a 2" rain event with no discharge.
- Grates have been placed over outfall 002 and 003 (see attached picture). The grates will allow water to go into the outfall but will prevent animals or other objects entering this outfall. (This was done in response to the November 2006 event when a raccoon was found blocking the inlet pipe to the station).
- To prevent erosion, riprap stones will be placed in front of Outfalls 002 and Outfalls 003. This will be completed no later than June 1, 2007.
- Drainage Areas 4 & 5, cages (i.e. excess plant equipment) are no longer stored outside exposed to stormwater.
- All petroleum drums and aboveground storage tanks (ASTs) for new and used oil associated with vehicle maintenance are stored under cover in Drainage Area 5.

Ms. Moore  
April 13, 2007  
Page 2 of 2

The following procedures have been revised or implemented at the plant:

- An outside vendor cleans out Outfalls 002 and 003 monthly.
- The outfalls are inspected every shift (3 times per day). If any debris is found in outfalls or sump areas, it is removed. Please note that this should no longer happen with the grating. If debris is found, it is brought to the attention of the Environmental Manager. The Environmental Manager will determine if any additional steps will need to be taken.
- During a rain event, the wastewater technician inspects pumps to make sure they are functioning properly. All technicians have been advised of this new procedure.

In addition, Allens is evaluating the live bird cooling and holding shed. This evaluation includes both short term and long term enhancements. One solution that is currently being investigated is to have an industrial strength scrubber/vac for the live bird cooling and holding shed. A vendor is setting up an on-site demonstration which will take place before the end of April.

While this evaluation of the live bird cooling and holding shed continues, Allens has added a scheduled maintenance program for this shed. A checklist is being developed to document this scheduled maintenance and will include a once per week clean out of the shed. This item has been added as a BMP.

As part of this process, the Storm Water Plan is being updated to reflect the updated and additional procedures, the Best Management Practices (Table 3) and the site descriptions, Section 2.0-2.5.

The revised text and Tables will be forwarded under separate cover. Please feel free to contact me if you have any questions.

Sincerely,  
BP Environmental, Inc.



Lou Ann Parson  
President

cc: Mike Sause, Allen Harbeson,  
Tom Brinson, Allen's Hurlock  
BPE Files

**Moore Amber N. (DNREC)**

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**From:** Tom Brinson [tom.brinson@allenfamilyfoods.com]  
**Sent:** Thursday, April 05, 2007 4:48 PM  
**To:** Lou Ann Parson  
**Subject:** Harbeson

.net,  
Attached are the pictures you requested



M. Thomas Brinson  
Corporate Environmental Manager  
Allen Family Foods, Inc.  
410 943-3989 Ext. 190  
[tom.brinson@allenfamilyfoods.com](mailto:tom.brinson@allenfamilyfoods.com)

4/16/2007

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## Moore Amber N. (DNREC)

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**Cc:** Tom Brinson; mikesauce@allenfamilyfoods.com  
**Subject:** AI-130-02 Allen Family Foods, Inc. Harbeson  
**Attachments:** 04.09.07.AL-130-02.response.pdf; Harbeson

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BP Environmental, Inc.  
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**Moore Amber N. (DNREC)**

**From:** Moore Amber N. (DNREC)  
**Sent:** Thursday, December 07, 2006 3:30 PM  
**To:** 'Michael Sause'  
**Subject:** RE: Response to Letter dated 10-02-06

Good Afternoon Mike,

You are correct. In a conversation held at your facility on October 27, 2006 you indicated that Mr. Brinson had assumed responsibility for providing a response to my October 2, 2006 letter. Please know, I have not received a response from Mr. Brinson to date. The timeframe for submitting a response has passed. Mr. Brinson needs to submit something asap.

Thank you,

Amber

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**From:** Michael Sause [mailto:michael.sause@allenfamilyfoods.com]  
**Sent:** Thursday, December 07, 2006 3:21 PM  
**To:** Moore Amber N. (DNREC)  
**Subject:** Response to Letter dated 10-02-06

Amber,

I am writing this e-mail to confirm our conversation that the response to your letter to me dated October 2, 2006 regarding stormwater discharges was discussed at Allen Family Foods and the responsibility for the response was to be assumed by Tom Brinson, Corporate Environmental Manager for the company.

I am sure that Mr. Brinson will be in contact with you to discuss the letter and its submittal.

Thanks,  
 Michael Sause  
 Environmental Manager  
 Allen Family Foods, Inc.  
 302-684-1640. Ext. 184

Called Lou Ann regarding  
 the excadern - will be  
 likely to implement  
 additional BMPs until  
 resolution is devised.

12-14-06



**Moore Amber N. (DNREC)**

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**From:** Moore Amber N. (DNREC)  
**Sent:** Wednesday, January 03, 2007 2:52 PM  
**To:** 'Lou Ann Parson'  
**Cc:** 'Michael Sause'  
**Subject:** Allen Family Foods - Response to Letter dated 10-2-06

Good Afternoon Lou Ann and Happy New Year!

This email shall serve to follow-up our recent correspondence regarding my letter of October 2, 2006. As confirmed, BP Environmental has been retained by Allen's to investigate the cause for each storm water monitored "exceedance" at the facility. Your associate, Dr. Ed Hipps, will be reviewing this situation sometime in January. Based upon his investigation, documentation will be provided to the Department identifying: potential sources of pollution; ineffective best management practices; and additional best management practices necessary to meet the effluent limitations specified by the facility's permit. I am requesting that the results of the investigation be submitted to the Department by February 28, 2007.

I do believe that the best management practices in the vicinity of the outfall need to be improved. I look forward to reviewing the results of your investigation.

Should you have any questions or require additional information, please feel free to contact me at (302) 739-9946.

Sincerely,

Amber N. Moore  
Env. Scientist  
Surface Water Discharges Section