Pinnacle
FOODS CORPORATION

FILE COPY

P.O. Box 625, Rt. 331S, Millsboro, DE 19966

December 12, 2006

Mr. Peder Hansen, P.E.
Program Manager
Pollution Control Branch
Division of Water Resources
DNREC
89 Kings Highway
Dover DE 19903

RE: Nutrient Offset Plan Report

Dear Mr. Hansen:

This letter serves as the twelfth installment of the Pinnacle Foods Corporation's Nutrient Offset Plan Report. As required by Special Condition #7 of Pinnacle's NPDES Permit DE 0000736, "The permittee shall submit progress reports every six months outlining actions taken toward implementing this plan".

Spray irrigation operations began on May 4, 2006 and came to a close on October 27, 2006. Over 14.5 million gallons were sprayed on the Reed Canary/Orchard grass site. The cutting of the field for the second half of the year occurred at the end of November. A total of 20.6 tons was cut and baled. The 20.6 tons is also our grand total for the year. Due to very wet weather, the hay molded after the cutting last spring and was allowed to decay to contribute additional nutrients to support the grass stand.

The net pounds of nitrogen removed for the year (after deducting the fertilizer applied in the spring) is 271 pounds. The total phosphorus removed for the year is 429 pounds.

Should you have any questions please call me at 302-934-3833.

Sincerely,

Beth B. Sise

Beth B. Sise
Environmental Control Mgr.

Cc. Dave Carter, PFC
Lynn Jenkines, PFC
Randy Spence, PFC