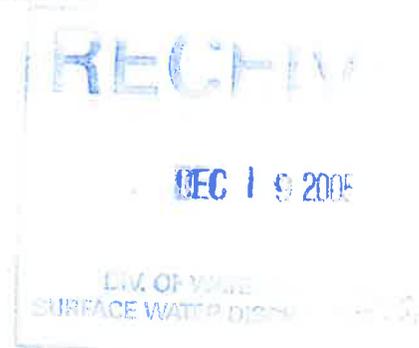


P.O. Box 625, Rt. 331S, Millsboro, DE 19966

December 1, 2005

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 tenth 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 June 14, 2005 and came to a close on October 20, 2005. Over 15 million gallons were sprayed on the Reed Canary/Orchard grass site. The second cutting of the field for the year occurred in November. A total of 20.6 tons were removed. This gives us a grand total of 81 tons of grass removed in 2005. The net pounds of nitrogen removed for the year (after deducting the fertilizer applied in the Spring) is 1532 pounds. The total phosphorus removed for the year - 847 pounds.

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

Sincerely,

Beth B. Sise
Environmental Control Mgr.

Cc. Ward Halverson, PFC
Lynn Jenkins, PFC
Randy Spence, PFC