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

SURFACE WATER

January 5, 2011

Mr. Glenn Davis  
Program Manager  
Surface Water Discharges Section  
DNREC  
89 Kings Highway  
Dover DE 19901

RE: Nutrient Offset Plan Report: Revised

Dear Mr. Davis

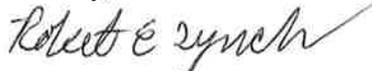
This letter serves as the twentieth installment of the Pinnacle Foods Group LLC Nutrient Offset Plan Report. As required by Special Condition #7 of Pinnacle's NPDES Permit DE 0000736, "The permittee shall submit progress reports every six months outlining actions taken toward implementing this plan".

Spray irrigation operations began on July 13, 2010 and came to a close on October 14, 2010. Over 13.7 million gallons were sprayed on the Reed Canary/Orchard grass site. The field was cut two times in 2010, once each in May and November. The May cutting yielded a total of 35 bales. The November cutting produced 115 bales. We also removed 12 bales in January 2010 that we were unable to get in December 2010 due to the weather. The total was 162 bales removed in 2010.

The net lbs. of Nitrogen and Phosphorous removed were 8232 lbs. Nitrogen and 2052 lbs. Phosphorous after fertilizer was added.

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

Sincerely,



Robert E. Lynch  
Environmental/Wastewater Supervisor