



United States Environmental Protection Agency  
Washington, D.C. 20460

# Water Compliance Inspection Report

## Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 <u>W</u>	2 <u>5</u>	3 <u>080617</u> 11	12 <u>080617</u> 17	18 <u>S</u>	19 <u>S</u>
Remarks					
21					
Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved	
67 <u>0110</u> 69	70 <u>3</u>	71 <u>F</u>	72 <u>N</u>	73	74

## Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time/Date	Permit Effective Date
	<u>09:30</u> <u>6-17-08</u>	<u>12-1-00</u>
<u>PINNACLE FOODS CORP.</u> <u>P.O. Box 625</u> <u>MILLSBORO DE 19966</u>	Exit Time/Date	Permit Expiration Date
	<u>13:15</u> <u>6-17-08</u>	<u>11-30-05</u>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data (e.g., SIC NAICS, and other descriptive information)	
<u>BOB LYNCH (DIR)</u> <u>(302) 934-3833</u>		
Name, Address of Responsible Official/Title/Phone and Fax Number	Contacted	
<u>RANDY SPENCE (PLANT MGR)</u> <u>(302) 934-3841</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

## Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

## Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	_____
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	_____
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	_____
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	_____

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
<u>Allen V. McRoby</u>	<u>DNREC (302) 739-9946</u>	<u>6-17-08</u>
Signature of Management Q.A. Reviewer	Agency/Office/Phone and Fax Numbers	Date
<u>[Signature]</u>	<u>DNREC (302) 739-9946</u>	<u>7-16-08</u>

Sections F thru L: Complete on all inspections, as appropriate. N/A = Not Applicable		PERMIT NO. <b>DE 0000736</b>
<b>SECTION F - Facility and Permit Background</b>		
ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY (Including City, County and ZIP code)	DATE OF LAST PREVIOUS INVESTIGATION BY EPA/STATE	
<b>- SAME -</b>	<b>5-15-07</b>	
FINDINGS		
<b>SECTION G - Records and Reports</b>		
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A (Further explanation attached _____)		
DETAILS:		
(a) ADEQUATE RECORDS MAINTAINED OF:		
(i) SAMPLING DATE, TIME, EXACT LOCATION <b>&amp; PERSON</b>	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(ii) ANALYSES DATES, TIMES	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(iii) INDIVIDUAL PERFORMING ANALYSIS	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(iv) ANALYTICAL METHODS/TECHNIQUES USED	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(v) ANALYTICAL RESULTS (e.g., consistent with self-monitoring report data)	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(b) MONITORING RECORDS (e.g., flow, pH, D.C., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS (e.g. continuous monitoring instrumentation, calibration and maintenance records).		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT.		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(d) FACILITY OPERATING RECORDS KEPT INCLUDING OPERATING LOGS FOR EACH TREATMENT UNIT.		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(e) QUALITY ASSURANCE RECORDS KEPT.		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(f) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES (and their compliance status) USING PUBLICLY OWNED TREATMENT WORKS.		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
<b>SECTION H - Permit Verification</b>		
INSPECTION OBSERVATIONS VERIFY THE PERMIT. <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A (Further explanation attached _____)		
DETAILS:		
(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(b) FACILITY IS AS DESCRIBED IN PERMIT.		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION.		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION.		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES.		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(f) ACCURATE RECORDS OF RAW WATER VOLUME MAINTAINED.		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(g) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT.		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(h) CORRECT NAME AND LOCATION OF RECEIVING WATERS. <b>WARTON BRANCH</b>		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(i) ALL DISCHARGES ARE PERMITTED.		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
<b>SECTION I - Operation and Maintenance</b>		
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A (Further explanation attached _____)		
DETAILS:		
(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED. <b>No Power/No Flow</b>		
	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.		
	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
(c) REPORTS ON ALTERNATE SOURCE OF POWER SENT TO EPA/STATE AS REQUIRED BY PERMIT.		
	<input type="checkbox"/> YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED. <b>ABU-0024/94C</b>		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(e) ALL TREATMENT UNITS IN SERVICE.		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(f) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS. <b>CARE</b>		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(g) QUALIFIED OPERATING STAFF PROVIDED. <b>SEE 4.04</b>		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS. <b>DRCC/OST</b>		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS.		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(j) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT.		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED. <b>12-11-07</b>		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(l) SPCC PLAN AVAILABLE. <b>REVISED 2006</b>		
	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(m) REGULATORY AGENCY NOTIFIED OF BY PASSING. (Dates _____)		
	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
(n) ANY BY-PASSING SINCE LAST INSPECTION.		
	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
(o) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED.		
	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A

PERMIT NO.  
**DE 0000736**

**SECTION J - Compliance Schedules**

PERMITTEE IS MEETING COMPLIANCE SCHEDULE.  YES  NO  N/A (Further explanation attached \_\_\_\_\_)

CHECK APPROPRIATE PHASE(S):

- (a) THE PERMITTEE HAS OBTAINED THE NECESSARY APPROVALS FROM THE APPROPRIATE AUTHORITIES TO BEGIN CONSTRUCTION.
- (b) PROPER ARRANGEMENT HAS BEEN MADE FOR FINANCING (mortgage commitments, grants, etc.).
- (c) CONTRACTS FOR ENGINEERING SERVICES HAVE BEEN EXECUTED.
- (d) DESIGN PLANS AND SPECIFICATIONS HAVE BEEN COMPLETED.
- (e) CONSTRUCTION HAS COMMENCED.
- (f) CONSTRUCTION AND/OR EQUIPMENT ACQUISITION IS ON SCHEDULE.
- (g) CONSTRUCTION HAS BEEN COMPLETED.
- (h) START-UP HAS COMMENCED.
- (i) THE PERMITTEE HAS REQUESTED AN EXTENSION OF TIME.

**SECTION K - Self-Monitoring Program**

**Part 1 - Flow measurement** (Further explanation attached \_\_\_\_\_)

PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT.  YES  NO  N/A  
DETAILS:

- (a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED.  YES  NO  N/A  
TYPE OF DEVICE:  WEIR  PARSHALL FLUME  MAGMETER  VENTURI METER  OTHER (Specify SONIC)
- (b) CALIBRATION FREQUENCY ADEQUATE. (Date of last calibration 4-7-08)  YES  NO  N/A
- (c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED.  YES  NO  N/A
- (d) SECONDARY INSTRUMENTS (totalizers, recorders, etc.) PROPERLY OPERATED AND MAINTAINED.  YES  NO  N/A
- (e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOW RATES.  YES  NO  N/A

**Part 2 - Sampling** (Further explanation attached \_\_\_\_\_)

PERMITTEE SAMPLING MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT.  YES  NO  N/A  
DETAILS:

- (a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.  YES  NO  N/A
- (b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT.  YES  NO  N/A
- (c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT.  YES  NO  N/A  
IF NO,  GRAB  MANUAL COMPOSITE  AUTOMATIC COMPOSITE FREQUENCY 24 HR AMS
- (d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE.  YES  NO  N/A
  - (i) SAMPLES REFRIGERATED DURING COMPOSITING  YES  NO  N/A
  - (ii) PROPER PRESERVATION TECHNIQUES USED  YES  NO  N/A
  - (iii) FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT  YES  NO  N/A
  - (iv) SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40 CFR 136.3  YES  NO  N/A
- (e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT.  YES  NO  N/A
- (f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT.  YES  NO  N/A

**Part 3 - Laboratory** (Further explanation attached \_\_\_\_\_)

PERMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS AND INTENT OF THE PERMIT.  YES  NO  N/A  
DETAILS:

- (a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED. (40 CFR 136.3)  YES  NO  N/A
- (b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED.  YES  NO  N/A
- (c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED.  YES  NO  N/A
- (d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.  YES  NO  N/A
- (e) QUALITY CONTROL PROCEDURES USED.  YES  NO  N/A
- (f) DUPLICATE SAMPLES ARE ANALYZED. 25 % OF TIME.  YES  NO  N/A
- (g) SPIKED SAMPLES ARE USED. 25 % OF TIME.  YES  NO  N/A
- (h) COMMERCIAL LABORATORY USED.  YES  NO  N/A
- (i) COMMERCIAL LABORATORY STATE CERTIFIED.  YES  NO  N/A

LAB NAME Emniscope Labs Inc.  
LAB ADDRESS Hamington DE

PERMIT NO.

DE 0000 736

SECTION L - Effluent/Receiving Water Observations (Further explanation attached \_\_\_\_\_)

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOL	COLOR	OTHER
081	No	No	No	No	No	CLEAR	-

(Sections M and N: Complete as appropriate for sampling inspections)

SECTION M - Sampling Inspection Procedures and Observations (Further explanation attached \_\_\_\_\_)

- GRAB SAMPLES OBTAINED
- COMPOSITE OBTAINED
- FLOW PROPORTIONED SAMPLE
- AUTOMATIC SAMPLER USED
- SAMPLE SPLIT WITH PERMITTEE
- CHAIN OF CUSTODY EMPLOYED
- SAMPLE OBTAINED FROM FACILITY SAMPLING DEVICE

COMPOSITING FREQUENCY 24 hrs PRESERVATION ICED

SAMPLE REFRIGERATED DURING COMPOSITING:  YES  NO

SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE INDUSTRIAL

SECTION N - Analytical Results (Attach report if necessary)

*(This area is currently blank for analytical results.)*



**Calibration complies with  
ISO/IEC 17025 AND ANSI/NCSL Z540-1**



**Cert. No.: 4000-1281089**

**Traceable® Certificate of Calibration for Digital Thermometer**

**Instrument Identification:**

Model: 15-077-8      S/N: 61554790      Manufacturer : Control Company  
 Model: 15-077-7      S/N: 61554857

**Standards/Equipment:**

Description	Serial Number	Due Date	NIST Traceable Reference
Temperature Probe	149	7/13/06	A5706028-3
Thermistor Module	A17118	8/12/06	A5819038
Temperature Calibration Bath TC155	93139		
Temperature Calibration Bath TC191	A42238		
Temperature Probe	157	9/01/06	A5815063
Thermistor Module	A27129	7/05/06	1000189003

**Certificate Information:**

Technician: 68      Procedure: CAL-06      Cal Date: 3/01/06      Cal Due: 3/01/08  
 Test Conditions: 24.0°C      44.0 %RH      1014 mBar

**Calibration Data: (New Instrument)**

Unit(s)	Nominal	As Found	In Tol	Nominal	As Left	In Tol	Min	Max	±uc	TUR
°C		N.A.		0.001	-0.002	Y	-0.049	0.051	0.013	3.8:1
°C		N.A.		24.999	25.001	Y	24.949	25.049	0.013	3.8:1
°C		N.A.		59.999	60.001	Y	59.949	60.049	0.013	3.8:1
°C		N.A.		100.001	100.002	Y	99.951	100.051	0.013	3.8:1

**This Instrument was calibrated using Instruments Traceable to National Institute of Standards and Technology.**

A Test Uncertainty Ratio of at least 4:1 is maintained unless otherwise stated and is calculated using the expanded measurement uncertainty. Uncertainty evaluation includes the instrument under test and is calculated in accordance with the ISO "Guide to the Expression of Uncertainty in Measurement" (GUM). The uncertainty represents an expanded uncertainty using a coverage factor k=2 to approximate a 95% confidence level. In tolerance conditions are based on test results falling within specified limits with no reduction by the uncertainty of the measurement. The results contained herein relate only to the item calibrated. This certificate shall not be reproduced except in full, without written approval of Control Company.

Nominal=Standard's Reading; As Left=Instrument's Reading; In Tol=In Tolerance; Min/Max=Acceptance Range; ±uc=Measurement Uncertainty; TUR=Test Uncertainty Ratio; Accuracy=±(Max-Min)/2

*Wallace Berry*  
Wallace Berry, Technical Manager

**Maintaining Accuracy:**

In our opinion once calibrated your Digital Thermometer should maintain its accuracy. There is no exact way to determine how long calibration will be maintained. Digital Thermometers change little, if any at all, but can be affected by aging, temperature, shock, and contamination.

**Recalibration:**

For factory calibration and re-certification traceable to National Institute of Standards and Technology contact Control Company.

**CONTROL COMPANY 4455 Rex Road Friendswood, TX 77546 USA**  
**Phone 281 482-1714 Fax 281 482-9448 service@control3.com www.control3.com**

Control Company is an ISO 17025 Calibration Laboratory Accredited by (A2LA) American Association for Laboratory Accreditation, Certificate No. 1750.01.  
 Control Company is ISO 9001 Quality Certified by (DNV) Det Norske Veritas, Certificate No. CERT-01805-AQ-HOU.  
 International Laboratory Accreditation Cooperation (ILAC) - Multilateral Recognition Arrangement (MRA).



**WATER COMPLIANCE INSPECTION REPORT**  
**STORM WATER EVALUATION**  
 National Pollutant Discharge Elimination System Permitting Program  
 Delaware Department of Natural Resources and Environmental Control  
 Surface Water Discharges Section

Name and location of Facility Inspected <b>Pinnacle Foods (VIASIC)</b>	Entry Date/Time <b>6-17-08 @ 09:30</b>
Facility Permit No. <b>DE 0000736</b>	
Facility Contact <b>RANDY SPENCE (PLT. MGR)</b>	Exit Date/Time <b>6-17-08 @</b>

An evaluation of the facility's storm water management program was completed in order to determine whether or not the facility is operating in compliance with regards to the storm water permitting requirements of their NPDES permit. The evaluation consisted of a records review and a visual observation of the facility's storm water management system.

The facility is permitted to discharge storm water from Outfall(s) \_\_\_\_\_.

RECORDS REVIEW		Yes	No	S/C
1)	<b>Storm Water Plan.</b> Has the facility developed and implemented a Storm Water Plan as required by Part III of their NPDES Permit? What is the date of the current SWP?	X		
2)	<b>Training.</b> Training completed annually? Are all employees and contractor personnel that work in areas where industrial materials are used/stored trained to meet the requirements of the SWP?	X		
3)	<b>Inspection Records.</b> Are storm water inspections conducted and documented? Please describe. <b>DONE ANNUALLY</b>	X		
4)	<b>Monitoring Data.</b> Has the facility performed storm water monitoring as required by the permit?		X	
5)	<b>Spill and Leaks.</b> Have any major spills or leaks occurred resulting in a discharge to the storm water conveyance system? If so, are records maintained indicating spills/leaks?		X	

PHYSICAL INSPECTION		Yes	No	S/C
1)	<b>Storm Water Outfalls.</b> Are storm water outfalls identified as required? Outfalls free of trash/ debris/erosion? Any non-storm water discharges occurring?	X		
2)	<b>Storm Water Conveyance System.</b> Are catch basins, storm water conveyance systems and storm water treatment facilities cleaned at appropriate intervals? Is the storm water conveyance system free of trash and debris?	X		
3)	<b>Good Housekeeping Practices.</b> Are outside areas kept neat and clean? Is process debris removed regularly? Is there evidence of leaks/spills? Is there evidence of particulate matter or visible deposits and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water discharge?	X		
4)	<b>Storm Water Pollution:</b> materials being stored in a manner that minimizes their exposure to storm water?	X		
5)	<b>Storm Water Visual Observations:</b> Are the following present in storm water discharges or do the outfalls indicate evidence thereof?			

OUTFALL NUMBER	OIL SHEEN	VISIBLE FOAM	VISIBLE FLOATING SOLIDS	COLOR
<b>002-003-004-005</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	-
<b>006-007-009</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	-

**COMMENTS**

*House keeping very good, all outfalls identified!*

Compliance Status At Time of Inspection: **IN COMPLIANCE**

Reconnaissance Inspection Required: Yes or No **No** If Yes, an Inspection shall be completed within \_\_\_\_\_ months.

Inspector's Printed Name: **Allen V. McCleskey**  
 Inspector's Signature: *Allen V. McCleskey* Date: **6-17-08**



# A&L EASTERN LABORATORIES, INC.

7621 Whitepine Road • Richmond, Virginia 23237  
(804) 743-9401 • Fax No. (804) 271-6446

Report Number: R08008-8006  
Account Number: 25002

COPY: JACK KIMBLES

FOR: VLASIC PINNACLE FOODS

TO: SYNAGRO CENTRAL LLC  
7014 E BALTIMORE AVE  
BALTIMORE, MD 21224

DATE SAMPLED: 12/20/2007 1300  
DATE RECEIVED: 1/8/2008 1000  
DATE REPORTED: 1/14/2008 PAGE: 1

## REPORT OF ANALYSIS

LAB NUMBER: 40136  
SAMPLE ID: VLASIC #1

PARAMETER	RESULT (%)	RESULT (mg/kg)	DETECTION LIMIT (mg/kg)	ANALYST	ANALYSIS DATE	ANALYSIS TIME	METHOD
Solids, Total (As is)	1.90	19000	100	JM	01/08/08	16:00	SM 2540G
Nitrogen, Total Kjeldahl	2.32	23200	10	MW	01/09/08	16:00	EPA 351.3
Phosphorus	1.30	13000	100	DH	01/09/08	16:00	SW 846-3051/6010B
Potassium	0.93	9300	100	DH	01/09/08	16:00	SW 846-3051/6010B
Sulfur	1.67	16700	100	DH	01/09/08	16:00	SW 846-3051/6010B
Calcium	1.87	18700	100	DH	01/09/08	16:00	SW 846-3051/6010B
Magnesium	0.25	2500	100	DH	01/09/08	16:00	SW 846-3051/6010B
Sodium	8.36	83600	100	DH	01/09/08	16:00	SW 846-3051/6010B
Iron		19800	1	DH	01/09/08	16:00	SW 848-3051/6010B
Manganese		3980	1	DH	01/09/08	16:00	SW 848-3051/6010B
Copper		65	1	DH	01/09/08	15:00	SW 846-3051/6010B
Zinc		225	1	DH	01/09/08	16:00	SW 846-3051/6010B
Nitrogen, Ammonia (as N)	1.37	13700	10	MW	01/09/08	14:00	EPA 350.2
Nitrogen, Organic (N)	0.95	9500	100	DCH	01/09/08	14:00	CALCULATION
Nitrogen, NO3+NO2		63	1	KS	01/10/08	15:00	SM 4500-NO3F
Cadmium		1.2	1	DH	01/09/08	16:00	SW 846-3051/6010B
Chromium		49	5	DH	01/09/08	16:00	SW 846-3051/6010B
Nickel		30	5	DH	01/09/08	16:00	SW 846-3051/6010B

All values are on a dry weight basis except as noted. \*Detection Limit on all N series is on a wet basis.  
Our reports and letters are for the exclusive and confidential use of our clients, and may not be reproduced in whole or in part, nor may any reference be made to the work, the results, or the company in any advertising, news release, or other public announcements without obtaining our prior written authorization.

*Paul C. H. CHU*  
PAUL C. H. CHU

Report Number:  
R08008-8006  
Account Number:  
25002

**A&L EASTERN LABORATORIES, INC.**  
7621 Whitepine Road • Richmond, Virginia 23237  
(804) 743-9401 • Fax No. (804) 271-6446



COPY: JACK KIMBLES

FOR: VLASIC PINNACLE FOODS

TO: SYNAGRO CENTRAL LLC  
7014 E BALTIMORE AVE  
BALTIMORE, MD 21224

DATE SAMPLED: 12/20/2007 1300  
DATE RECEIVED: 1/8/2008 1000  
DATE REPORTED: 1/14/2008 PAGE: 2

**REPORT OF ANALYSIS**

LAB NUMBER: 40136  
SAMPLE ID: VLASIC #1

PARAMETER	RESULT (ppm)	RESULT (mg/kg)	DETECTION LIMIT (mg/kg)	ANALYST	ANALYSIS DATE	ANALYSIS TIME	METHOD
Lead	7.49	8	5	DH	01/09/08	16:00	SW 846-3051/6010B
Arsenic	0.74	7.0	1.0	DH	01/09/08	15:00	SW 846-6010B
Mercury		<0.4	0.4	KM	01/10/08	15:00	SW 846-7471A
Selenium		1.8	1.0	DH	01/09/08	15:00	SW 846-6010B
pH (Std. Unit, As is)			0.01	RD	01/09/08	12:30	SW 846-9045C
Calcium Carbonate Equiv (CCE)		7400	100	JM	01/11/08	15:00	AOAC 955.01
Solids, Volatile(Organic Matter)		505200	100	DH	01/09/08	16:00	SM 2540G
Molybdenum		<5	5	DH	01/09/08	16:00	SW 846-3051/6010B

**All values are on a dry weight basis except as noted. Detection Limit on all N series is on a wet basis.**  
Our reports and letters are for the exclusive and confidential use of our clients, and may not be reproduced in whole or in part, nor may any reference be made to the work, the results, or the company in any advertising, news release, or other public announcements without obtaining our prior written authorization.

*Paul C. H. Chu*  
PAUL C. H. CHU

Report Number: R08008-8007  
Account Number: 25002

**A&L EASTERN LABORATORIES, INC.**  
7621 Whitepine Road • Richmond, Virginia 23237-2214  
Phone (804) 743-9401 • Fax (804) 271-6446  
Website: www.al-labs-eastern.com • E-mail: office@al-labs-eastern.com



TO: SYNAGRO CENTRAL LLC  
7014 E BALTIMORE AVE  
BALTIMORE, MD 21224

FOR: VLASIC PINNACLE FOODS

COPY: JACK KIMBLES

LAB NUMBER: 40137  
SAMPLE ID: VLASIC #2

DATE SAMPLED: 12/20/2007 1300  
DATE RECEIVED: 1/8/2008 1000  
DATE REPORTED: 1/11/2008 PAGE: 1

**REPORT OF ANALYSIS**

PARAMETER	RESULT (ppm)	RESULT (mg/kg)	DETECTION LIMIT (mg/kg)	ANALYST	ANALYSIS DATE	ANALYSIS TIME	METHOD
-----------	--------------	----------------	-------------------------	---------	---------------	---------------	--------

Solids, Total (As is)	1.55	15500	100	JM	01/08/08	16:00	SM 2540G
Nitrogen, Total Kjeldahl	2.58	25800	10	MW	01/09/08	16:00	EPA 351.3
Phosphorus	1.29	12900	100	DH	01/09/08	16:00	SW 846-3051/6010B
Potassium	0.96	9600	100	DH	01/09/08	16:00	SW 846-3051/6010B
Sulfur	1.61	16100	100	DH	01/09/08	16:00	SW 846-3051/6010B
Calcium	1.88	18800	100	DH	01/09/08	16:00	SW 846-3051/6010B
Magnesium	0.25	2500	100	DH	01/09/08	16:00	SW 846-3051/6010B
Sodium	8.63	86300	100	DH	01/09/08	16:00	SW 846-3051/6010B
Iron		18100	1	DH	01/09/08	16:00	SW 846-3051/6010B
Manganese		3950	1	DH	01/09/08	16:00	SW 846-3051/6010B
Copper		60	1	DH	01/09/08	15:00	SW 846-3051/6010B
Zinc		214	1	DH	01/09/08	16:00	SW 846-3051/6010B
Nitrogen, Ammonia (as N)	2.00	20000	10	MW	01/09/08	14:00	EPA 350.2
Nitrogen, Organic (N)	0.58	5800	100	DCH	01/10/08	15:00	CALCULATION
Nitrogen, NO3+NO2		<1	1	KS	01/09/08	16:00	SM 4500-NO3F
Cadmium		1.2	1	DH	01/09/08	16:00	SW 846-3051/6010B
Chromium		40	5	DH	01/09/08	16:00	SW 846-3051/6010B
Nickel		27	5	DH	01/09/08	16:00	SW 846-3051/6010B

All values are on a dry weight basis except as noted. \*Detection Limit on all N series is on a wet basis or reports and letters are for the exclusive and confidential use of our clients, and may not be reproduced in whole or in part, nor may any reference be made to the work, the results, or the company in any advertising, news release, or other public announcements without obtaining our prior written authorization.

*Paul C. H. Chu*  
PAUL C. H. CHU

Report Number: 8008-8007  
Count Number: 102

**A&L EASTERN LABORATORIES, INC.**  
7621 Whitepine Road • Richmond, Virginia 23237-2214  
Phone (804) 743-9401 • Fax (804) 271-6446  
Website: www.al-labs-eastern.com • E-mail: office@al-labs-eastern.com



TO: SYNAGRO CENTRAL LLC  
7014 E BALTIMORE AVE  
BALTIMORE, MD 21224

FOR: VLASIC PINNACLE FOODS

COPY: JACK KIMBLES

SAMPLE NUMBER: 40137  
SAMPLE ID: VLASIC #2

### REPORT OF ANALYSIS

DATE SAMPLED: 12/20/2007 1300  
DATE RECEIVED: 1/8/2008 1000  
DATE REPORTED: 1/11/2008 PAGE: 2

METER	RESULT (mg/kg)	DETECTION LIMIT (mg/kg)	ANALYST	ANALYSIS DATE	ANALYSIS TIME	METHOD
Mercury	7.50	7	DH	01/09/08	16:00	SW 846-3051/6010B
Lead	6.2	1.0	DH	01/09/08	15:00	SW 846-6010B
Chromium	< 0.4	0.4	KM	01/10/08	15:00	SW 846-7471A
Lead, As is	< 1.0	1.0	DH	01/09/08	15:00	SW 846-6010B
Iron Carbonate Equiv (CCE)	0.89	0.01	RD	01/09/08	12:30	SW 846-9045C
Organic Matter	50.28	100	MW	01/09/08	15:00	AOAC 955.01
	< 5	100	DH	01/09/08	16:00	SM 2540G
		5	DH	01/09/08	16:00	SW 846-3051/6010B

All values are on a dry weight basis except as noted. \*Detection Limit on all N series is on a wet basis and letters are for the exclusive and confidential use of our clients, and may not be reproduced in whole or in part, nor may any reference be made to the results, or the company in any advertising, news release, or other public announcements without obtaining our prior written authorization.

Dal Ph



**HORNEY INDUSTRIAL ELECTRONICS**

*Process Control Technology*

**CERTIFICATE OF CALIBRATION**

Date : April 7, 2008

Pinnacle Foods  
P.O. Box 625  
Millsboro DE 19966



Purchase Order: 0710022994

Job#:603505

<u>Manfg.</u>	<u>Serial#</u>	<u>Range</u>
F/P 1392 C/R	805C040U01-C03	0-1200 GPM
F/P 1392 C/R	8050040U01-B03	0-1200 GPM
E/H FMU 861	8AR009-EP40	0-1000 GPM
F/P 1392 C/R	207775-002	0-1200 GPM
F/P Ultrasonic	95W032110	0-1200 GPM
F/P Ultrasonic	95W001009	0-500 GPM
Siemens Mag 5000	104213N056	0-250 GPM
Siemens Mag 5100 3" Tube	469113T036	0-250 GPM

ALL CALIBRATION TRACEABLE TO N.I.S.T. AS PER MANFG. SPECIFICATION

Vernon M. Hodges



**Pinnacle**  
FOODS CORPORATION

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

June 2, 2005

Allen V. McCloskey Sr. \\  
Sr. Environmental Compliance Specialist  
Division of Water Resources  
DNREC  
89 Kings Highway  
Dover DE 19901



RE: Release of brine mixed with water

Dear Mr. McCloskey:

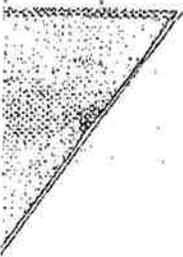
On Thursday, May 26<sup>th</sup>, 2005, Pinnacle Foods Corporation in Millsboro experienced a release of a brine mixture via storm drain outfall 004. This release occurred due to a pump failure at the tank yard lift station. The pump failed to come on as the water and brine entered the lift station. Eventually this material overflowed into the storm drain and was released.

Our second shift maintenance supervisor discovered that the tank yard lift station high level alarm was sounding at 6:10pm last Thursday evening. He immediately switched the pump to manual. The release was stopped at 6:15 pm. The amount of the release is unknown.

The second shift maintenance supervisor contacted me at home immediately. Once I arrived at the site I contacted the DNREC hotline. I also grabbed a sample of the material released. The analysis results are as follows; pH - 4.65su, BOD - 540 mg/l, TSS - 130 mg/l. We are unaware of any negative impacts on the receiving stream.

Maintenance was working at the lift station upon my arrival. Increased checks of the lift station have been implemented since then and the pump has been running fine.

Should you have any questions, please do not hesitate to call me at 302-934-3833.



Sincerely,

*Beth B Sise*

Beth B. Sise  
Environmental Control Mgr.

Cc. Michael Cook, DNREC  
Lynn Jenkins, PFC



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

June 1, 2006

Allen V. McCloskey Sr.  
Sr. Environmental Compliance Specialist  
Division of Water Resources  
DNREC  
89 Kings Highway  
Dover DE 19901

RE: Decant water spill at WWTP

Dear Mr. McCloskey:

Last night, Wednesday, May 31, 2006 the Pinnacle Foods Corporation's Wastewater Treatment Plant experienced a spill of sludge lagoon decant water. This water did not leave the property and did not enter a waterway. This letter is to summarize our phone conversation this morning.

The spill was discovered on second shift at approximately 6 pm by our maintenance supervisor. He notified me at home, and I arrived at the plant 20 minutes later. Upon containing the spill, I called the DNREC hotline to report the incident.

The cause of the spill was the result of a miscommunication. I was the attending operator this week while my regular operator was on vacation. From reading his notes, I assumed he had turned off the decant water and he had not. This is not a normal mode of operation. This water overflowed a wet well that is located between the digesters and the railroad track. I had turned off the wet well pump, thinking that it was no longer needed, which caused the wet well to overflow. The amount of water that overflowed cannot be determined and none left the property.

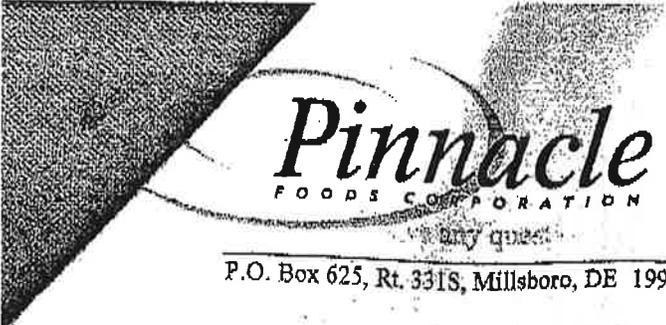
The DNREC Enforcement Officer that came to the site in response to my call last night was Mr. Dave Moyer.

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

Sincerely,

A handwritten signature in cursive script that reads "Beth B. Sise".

Beth B. Sise  
Environmental Control Mgr.

The logo for Pinnacle Foods Corporation features the word "Pinnacle" in a large, stylized, serif font. Below it, the words "FOODS CORPORATION" are written in a smaller, all-caps, sans-serif font. The logo is set against a background of a dark, textured triangle on the left and a lighter, textured circle on the right.

# Pinnacle

FOODS CORPORATION

any ques

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

August 20, 2007

Allen V. McCloskey Sr.  
Sr. Environmental Compliance Specialist  
Division of Water Resources  
DNREC  
89 Kings Highway  
Dover DE 19901

RE: Release of brine mixed with water

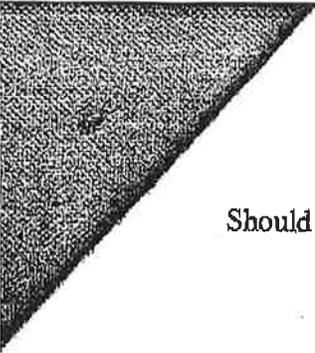
Dear Mr. McCloskey:

On Wednesday, August 15, 2007 Pinnacle Foods Corporation in Millsboro experienced a release of a water and brine mixture via storm drain outfall 002. This release occurred from the tankyard area.

The tankyard crew were filling and draining tanks on Wednesday afternoon. The lift station that pumps this tankyard wastewater was pumping, however the flow from the tankyard exceeded the pump capability. The brine and water filled the swales in the tankyard and eventually backed up onto the blacktop at dock N and exited via an adjacent storm drain (002). Upon discovering this overflow, a maintenance employee opened a manual gate valve prior to the tankyard pumping station and as a result overflowed the pumping station into storm drain 004. This action allowed a small amount of the tankyard wastewater to exit via storm drain 004.

Approximately 1500 gallons of water and brine mixture was released into the salt marsh between 3:15 and 5:00 pm through storm drains 002 and 004. Once the spill was discovered, temporary pumps and absorbent materials were used to limit the overflow. This water was sampled and analyzed in the QA lab. The results of the analyses were as follows: pH - 4.14 su, acidity - 26 grains, % chloride - 0.78% and calcium chloride - 561ppm.

The tankyard crew has been briefed on the importance of inspecting the swales as part of their routine activities. Engineering is evaluating the possibility of constructing a small containment berm on the north end of dock N in the tankyard, since this is the lowest area and is in such close proximity to storm drain 002.



Should you have any questions, please do not hesitate to call me at 302-934-3833.

Sincerely,

*Beth B Sise*

Beth B. Sise  
Environmental Control Mgr.

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

**PINNACLE FOODS CORPORATION**  
**STORMWATER POLLUTION PREVENTION PLAN**  
 Millsboro Delaware

**ANNUAL SITE COMPLIANCE EVALUATION -- CHECKLIST**

The Environmental Control Manager, or designee, is responsible for conducting the annual site compliance evaluations. This checklist provides an overview of the evaluation process - additional details are available in the SWP3 Plan.

**REVIEWER:**  **DATE STARTED:**   
**TITLE:**  **DATE COMPLETE:**   
**Team Members:**

Items to be Reviewed in Compliance Evaluation	Date Completed	Notes / Follow-up
Any drainage area modifications that require change to SWP3?	<input type="text" value="12/7/2006"/>	
Inspect stormwater drainage areas for evidence of pollutants entering the drainage system	<input type="text" value="12/7/2006"/>	Sweep Loading Docks
Inspect stormwater outfalls for the presence of non-storm water discharges	<input type="text" value="12/7/2006"/>	
Verify items that are listed as part of the material handling, storage and transfer areas covered by the SWP3	<input type="text" value="12/8/2006"/>	
Evaluate effectiveness of measures to reduce pollutant loading	<input type="text" value="12/7/2006"/>	
Observe structural measures, sediment controls, & other BMP to insure proper operation	<input type="text" value="12/7/2006"/>	
Verify spill cleanup, control equipment and containment structures in the areas covered by the SWP3	<input type="text" value="12/8/2006"/>	Seal glycol chiller containment
Observe Best Management Practices effectiveness to insure proper operation	<input type="text" value="12/8/2006"/>	
Inspect any equipment required by the SWP3	<input type="text" value="12/7/2006"/>	

**Items to Complete Following the Evaluation**

**Revise the SWP3 plan as required by the Annual Evaluation.**  (within 2 weeks of inspection)

**Implement any changes required.**

Where capital improvements are necessary, establish an implementation schedule. Include schedule in revised SWP3

**Prepare a Summary Report that includes:**

- Inspection Results
- Follow-up Actions
- Date of Inspection
- Personnel Conducting the Inspection
- All incidents of non-compliance
- If Facility is in compliance -- certification of compliance
- Summary Report must be signed by Plant Manager
- Reports must be retained for at least 3 years with SWP3

Fax Copy to WHQ. Keep Copy in SWP3 File.  
 Include Copy of Summary Report with Certification & Signature.

# Memorandum

**To:** Lynn Jenkins  
**CC:** Randy Spence, Dave Carter  
**From:** Beth Sise  
**Date:** 12/14/2006  
**Re:** SWP3 Annual compliance evaluation

---

## **Annual SWP3 Compliance Evaluation**

Bob Lynch and Beth Sise performed the annual site inspection on December 7, 2006. This was performed to verify the overall effectiveness of the Storm water Plan. The following items are listed in the plan (which was revised in July 2003) and were found to be in compliance:

1. The description of potential pollutant sources listed in Millsboro's SWP3 cites ethanol. Now that the vinegar plant is no longer operating, ethanol is not on site. This correction will be made during the next stormwater plan revision.
2. The site plan is accurate. It does not require an update.
3. Annual required training was completed in April/ May 2006.
4. All spill cleanup and control equipment structures listed in the plan remain in place. A work order has been submitted to seal the glycol chiller containment area closest to the plant as it no longer holds water. Spill kits are located:

Warehouse – spice cage

Maintenance shop – boiler room

Label area – on wall near sanitation room

Process room – on wall near sink

Pail room – in blue rolling container

Vinegar plant – on floor just inside the door

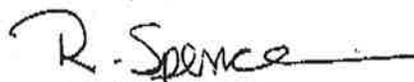
Tank yard – Salt house

5. There was no evidence of pollutants entering the drainage system.

December 14, 2006

6. The following are action items:

- Both warehouse loading docks require some trash pick-up.
- Glycol chiller containment needs to be sealed – work order submitted.



The facility was found to be in compliance with the current stormwater plan.

Randy Spence, Operations Manager, Plant

---

**PINNACLE FOODS CORPORATION**  
**STORMWATER POLLUTION PREVENTION PLAN**  
 Millisboro Delaware

**ANNUAL SITE COMPLIANCE EVALUATION -- CHECKLIST**

The Environmental Control Manager, or designee, is responsible for conducting the annual site compliance evaluations. This checklist provides an overview of the evaluation process - additional details are available in the SWP3 Plan.

**REVIEWER:**  **DATE STARTED:**   
**TITLE:**  **DATE COMPLETE:**   
**Team Members:**

Items to be Reviewed in Compliance Evaluation	Date Completed	Notes / Follow-up
Any drainage area modifications that require change to SWP3?	<input type="text" value="12/12/2007"/>	
Inspect stormwater drainage areas for evidence of pollutants entering the drainage system	<input type="text" value="12/12/2007"/>	
Inspect stormwater outfalls for the presence of non-storm water discharges	<input type="text" value="12/12/2007"/>	
Verify items that are listed as part of the material handling, storage and transfer areas covered by the SWP3	<input type="text" value="12/13/2007"/>	delete ethanol
Evaluate effectiveness of measures to reduce pollutant loading	<input type="text" value="12/12/2007"/>	
Observe structural measures, sediment controls, & other BMP to insure proper operation	<input type="text" value="12/12/2007"/>	
Verify spill cleanup, control equipment and containment structures in the areas covered by the SWP3	<input type="text" value="12/12/2007"/>	Glycol Chiller Containment needs to be sealed
Observe Best Management Practices effectiveness to insure proper operation	<input type="text" value="12/12/2007"/>	
Inspect any equipment required by the SWP3	<input type="text" value="12/12/2007"/>	

**Items to Complete Following the Evaluation**

**Revise the SWP3 plan as required by the Annual Evaluation.**  (within 2 weeks of inspection)

**Implement any changes required.**   
 Where capital improvements are necessary, establish an implementation schedule. Include schedule in revised SWP3

**Prepare a Summary Report that includes:**   
 Inspection Results  
 Follow-up Actions  
 Date of Inspection  
 Personnel Conducting the Inspection  
 All incidents of non-compliance  
 If Facility is in compliance -- certification of compliance  
 Summary Report must be signed by Plant Manager  
 Reports must be retained for at least 3 years with SWP3

**Fax Copy to WHQ. Keep Copy in SWP3 File.**  
**Include Copy of Summary Report with Certification & Signature.**

# Memorandum

**To:** Lynn Jenkins  
**CC:** Randy Spence, Dave Carter  
**From:** Beth Sise  
**Date:** 12/14/2007  
**Re:** SWP3 Annual compliance evaluation

---

## Annual SWP3 Compliance Evaluation

Beth Sise performed the annual site inspection on December 12, 2007. This was performed to verify the overall effectiveness of the Storm water Plan. The following items are listed in the plan (which was revised in July 2003) and were found to be in compliance:

1. The description of potential pollutant sources listed in Millsboro's SWP3 cites ethanol. Now that the vinegar plant is no longer operating, ethanol is not on site. This correction will be made during the next stormwater plan revision.
2. The site plan is accurate. It does not require an update.
3. Annual required training was completed in June 2007.
4. All spill cleanup and control equipment structures listed in the plan remain in place. A work order has been submitted to seal the glycol chiller containment area closest to the plant as it no longer holds water. Spill kits will be replenished in January. Spill kits are located :

Warehouse -- spice cage

Maintenance shop -- boiler room

Label area -- on wall near sanitation room

Process room -- on wall near sink

Pail room -- in blue rolling container

Vinegar plant -- on floor just inside the door

Tank yard -- Salt house

5. There was no evidence of pollutants entering the drainage system.

December 14, 2007

6. The following are action items:

- Glycol chiller containment must be sealed. Containment area near tank does not hold water.

The facility was found to be in compliance with the current stormwater plan.

R. Spence

Randy Spence, Operations Manager, Plant



STATE OF DELAWARE  
DEPARTMENT OF NATURAL RESOURCES AND  
ENVIRONMENTAL CONTROL  
DIVISION OF WATER RESOURCES  
89 KINGS HIGHWAY  
DOVER, DELAWARE 19901

ENVIRONMENTAL  
LABORATORY SECTION

PHONE: (302) 739-9942  
FAX: (302) 739-3491

**July 09, 2008**

J. Chris Cleaver  
DWR - Surface Water Discharge Section - NPDES  
89 Kings Highway  
Dover, DE 19901

Attention: J. Chris Cleaver

Attached you will find the following Laboratory Results:

**Order Number:** 0806056  
**Project Description:** Pinnacle  
**Date Received:** 06/18/2008  
**Time Received:** 13:31

If you have any questions regarding this data, please contact me at the above telephone number.

Sincerely,

  
Kathy A. Knowles  
Laboratory Manager

***Delaware's good nature depends on you!***



## Qualifier Codes, Definitions, and Abbreviations

### Qualifier/Flag

<	Sample value is below the method detection limit. The result is reported as < MDL.
>	Sample value is above the upper quantitation limit. The upper quantitation limit is reported.
AB	Air Bubble in DO bottle
B	Compound not detected substantially (10 times) above the level reported in the laboratory blanks (For Chlorophyll & Pheophytin, blank value is at or below amount detected in sample).
BT	Secchi disk ON BOTTOM. The reported result is the depth from the surface to the bottom.
C	See report narrative or comment line for observations concerning this result.
D	Sample diluted for analysis.
EG	Value exceeds a theoretically equivalent or greater value (e.g. dissolved > total).
EW	Value exceeds a theoretically equal or greater value (e.g. dissolved > total). However, the difference is within the expected precision of the analytical techniques and is not statistically significant.
FZ	Samples frozen prior to analysis
I	The reported value is estimated due to the presence of interference.
IM	Instrument malfunctioned; No measurement taken.
J	Analyte present; reported value is estimated; concentration is below the range for accurate quantitation (greater than the MDL, but less than the LOQ).
J V	Analysis performed after holding time expired.
JH	Result is likely overestimated due to matrix effect.
JL	Result is likely underestimated due to matrix effect.
K	Sample not analyzed for the dissolved metal. The Total metal result is below the lower quantitation limit.
LOQ	Limit of Quantitation
MDL	Method Detection Limit
NA	Not Analyzed but required by project workplan or analytical request form.
NBF	No bottom measurement recorded in the field due to shallow water; Bottom records are those measurements recorded at surface.
NC	Sample not collected, but required by the project work plan.
ND	Not Detected.
NE	Field measurement not taken due to uncontrollable field sampling event or Natural Condition (Depth of water too deep/shallow).
NF	Sample collected, but not analyzed by the laboratory due to field error.
NO	None Observed
NR	No Result. See report narrative or comments for explanation.
NV#	Analytical result not valid.
O	Sample outsourced for analysis. Data will be reported separately.
P	Sample not properly preserved in field in accordance with preservation requirements. Data may be suspect.
PMM	Par Meter Malfunction
QC	Quality control value is outside acceptance limits.
QNS	Quantity not sufficient. Not enough sample to perform requested analyses.
S	Results will be reported in a separate report; See attached report.
SD	Sample discarded; Sample collected but not analyzed as per client request.
SNF	Site has no flow (i.e. a dry stream or a stream with no velocity)
STD	Stream too deep
STS	Site is too shallow to sample
U	Compound was analyzed but not detected. The method detection limit is reported.
UR	Nothing unusual was noted during the analysis of this sample. However, the test result differs from the norm to an extent that the laboratory considers it unreliable.
USGS	Site has no flow (i.e. a dry stream or a stream with no velocity)
V	Analysis performed after holding time expired.



---

## *Qualifier Codes, Definitions, and Abbreviations*

---

### **Units**

CFS	Cubic Feet per Second.
cfu/100mL	Colony forming units per 100 mL.
G	gram; there are 1000 g in 1 Kg.
GPM	Gallons per minute.
IN	Inches.
Kg	Kilogram.
L	Liter.
mg	milligram; there are 1000 mg in 1 g.
MGD	Millions of Gallons per Day.
ml	milliliter; there are 1000 ml in 1 L.
mpn/100mL	most probable number per 100 mL.
NTU	Nephelometric Turbidity Units. NTU is numerically equivalent to Formazin turbidity unit (FTU).
oC	Celsius.
pCi/L	Pico curie per liter.
ppb	Parts per billion=ug/Kg, ug/L.
ppm	Parts per million=mg/Kg, ug/g, mg/L, ug/ml; 1 ppm=1000 ppb.
su	Standard Units.
ug	microgram; there are 1000 ug in 1 mg.
uL	microliter; there are 1000 ul in 1 ml.
uMhos	Conductivity units for laboratory measurements.
uS	micro siemens; units used to measure conductivity in the field; same as uMhos.





Environmental Laboratory Section - Division of Water Resources  
Delaware Department of Natural Resources and Environmental Control  
89 Kings Highway, Dover, DE 19901 Phone: 302-739-9942

# INVOICE

Page 1 of 1

**Invoice To:**

J. Chris Cleaver  
DWR - Surface Water Discharge Section - NPDES  
89 Kings Highway  
Dover, DE 19901

**Report To:**

J. Chris Cleaver  
DWR - Surface Water Discharge Section - NPDE  
89 Kings Highway  
Dover, DE 19901

Invoice ID	Account	ELS Contact	Invoice Date	Priority	
IN3395	DWR-NPDES	Donna.Faries	09-Jul-08	Normal	
Order ID	Project Name	Date Received			
0806056	Pinnacle	18-Jun-08			
Matrix	Description	Method	Quantity	Unit Price	Extended Price
Waste Water	Ammonia as N, Total	EPA 350.1	1	\$19.00	\$19.00
Waste Water	BOD, 5-Day	SM 5210B	1	\$22.00	\$22.00
Waste Water	Enterococcus	USEPA 1600	1	\$25.00	\$25.00
Waste Water	Phosphorus, Total, Alkaline Persulfate	SM 4500-P J	1	\$20.00	\$20.00
Waste Water	Residue, Nonfilterable (TSS)	EPA 160.2	1	\$11.00	\$11.00
				<b>Sub Total:</b>	\$97.00

*Thank you for allowing us to serve you*

<b>Total:</b>	<b>\$97.00</b>
---------------	----------------

Pinnacle (cont'd) 6-17-08

- Recount back aeration on to CW

- Sludge, guests Anaerobic Lagoon  
2.1 / 2.2 million gallons

- Supernatant removes digested sludge  
for land application

- Tests run @ Pinnacle

BOD<sub>5</sub>, TSS, pH

- Tests run @ Enviro Corp

TP, Amm. Nitrogen, Nitrate Nitrogen,

Nitrite Nitrogen, TKN, Enterococcus

★ Calibrated Thermometer expired 3/08

- pH Buffer 4.0 = 10/09, 7.0 = 9/09

Mettler 4520 H

- TSS Mettler 2540i

- Toured the process area and  
whse

- Allen McCloskey completed a Storm  
water inspection

- Need closing meeting

- Departed 1:35 hrs.

6/17/08 Pinnacle

- Arrived at 0930 hrs. Met w/ Randy Spence & Bob Lynch.
- Bob Lynch O&C Level TV
- Process waste to screens then sent around.
- To EQ Tank 450,000 gal
- To aeration basins 1,000,000 gal
- To Clarifier
- To Sand Filter
- Then to UV
- Ultrasonic flow meter V-notch last calibration 4-7-08
- Flow is maintained at  $\pm 10\%$
- Equal volume samples taken hourly
- \* Sample volume not documented
- Discharge to Wharton's Branch then to Indian River.
- 2nd (2) aerobic lagoons for wasted sludge.

Pinnacle Foods / VLogic  
(1972)

6-17-08

Arrived @ 09:30, Met w/ B. Lynch  
& R. Spence.

111 acres - Production waste → pit,  
- Screen Room → Mit Chamber  
→ EQ (450K) → Step Feed System  
→ Clarifier → Duna-Lands x 2  
→ UV. eff. Flow Meter (4-7-08) <sup>SONIC</sup>  
Sludge → Anaerobic Dig x 2 = (290K)

\* Sampler 1 x hr. (No Cal.)

\* Lab. Ther. needs cal.

Dig decant → Step feed / EQ.

Final Dig. 2.2 min → Cynagis.

Full time employees = 180 + 200  
seasonal.

## Storm Water Outfalls

002 - Clean, & identified

003 - Same.

004 - Same (Parking lot)

005 - Dry weather flows (toat wash down)

009 - Good

006 - Good

007 - Good



STATE OF DELAWARE  
DEPARTMENT OF NATURAL RESOURCES &  
ENVIRONMENTAL CONTROL  
DIVISION OF WATER RESOURCES  
89 KINGS HIGHWAY  
DOVER, DELAWARE 19901

Surface Water Discharges Section

Telephone: (302) 739-9946  
Facsimile: (302) 739-8369

June 18, 2008

Certified Mail # 7005 1820 0002 9303 5939  
Return Receipt Requested

PINNACLE Foods Corporation  
Mr. Randy Spence – Plant Manager  
29984 Pinnacle Way  
Route 331  
Millsboro, DE 19966

Re: Compliance Sampling & Inspection Sampling (CSI) – June 17, 2008  
NPDES Permit No. DE-0000736

Dear Mr. Spence:

On behalf of the State of Delaware, Surface Water Discharges Section, Compliance Branch, I would first like to thank you, Bob Lynch, and all of your personnel, for the cooperation and assistance during the Compliance Sampling & Inspection (CSI) completed at your facility on June 17, 2008.

Overall, the WWTP and plant operations housekeeping were very good. Data handling and traceability were found to be very acceptable, and all data & reports requested were produced in a timely manner. Laboratory records, reagents, instrumentation, and methods were found to be within NPDES requirements. Pinnacle's Storm Water Management Plan is up to date and appears to be in good order. During this CSI, there were no observable major deficiencies and I would like to commend everyone at Pinnacle for their efforts.

I would also like to thank you for personally giving Allen McCloskey and me a tour of the plant operations. The processing plant was very impressive, and all of the operators that we met were friendly and seemed to enjoy their jobs. I had no idea how much was involved in processing pickles; it was quite impressive. There was one (1) minor deficiencies noted during the inspection, as follows:

- Actual sample volume calibration and documentation is not being completed for the automatic composite sampler. Need to have documented evidence that sample volumes are consistent and accurate.

*Delaware's good nature depends on you!*

Pinnacle Foods Corporation

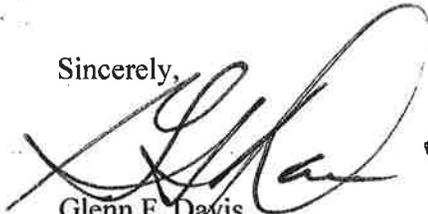
CSI – June 17, 2008

Page Two

Please send your formal response, including any corrective/preventative actions to the above noted deficiency, by no later than 30 days after receiving this letter.

I would again like to thank you for your cooperation and your participation in this Compliance Sampling Inspection program to help assure the continued quality of NPDES effluent waters and the self-reporting data. If you have any questions, please contact Mr. Allen McCloskey or me at 302-739-9946.

Sincerely,



Glenn F. Davis  
Program Manager  
Compliance Branch  
Surface Water Discharges Section  
State of Delaware – DNREC

ecopy: Mr. Peder Hansen - DNREC  
Mr. Allen McCloskey – DNREC

*[Handwritten signature]*  
*7/23/08*

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



June 18, 2008

Mr. Glenn F. Davis  
Program Manager  
Compliance Branch  
Surface Water Discharges Section  
State of Delaware -DNREC

RE: Compliance Sampling & Inspection Sampling (CSI) – June 17, 2008  
Corrective Actions

Dear Mr. Davis:

As you mentioned in your letter, there was one minor deficiency noted during the inspection as follows:

- Actual sample volume calibration and documentation is not being completed for the automatic composite sampler. Need to have documented evidence that sample volumes are consistent and accurate.

As a corrective action the sampler is being calibrated once per month. The individual sample size has been adjusted to 100ml and calibration is documented on the present BOD sheet. Actual amount versus objective is noted as well as any adjustments that are completed in the calibration. The time, date and person completing the calibration are documented as well.

Let me know if you need any further information on the corrective action. Thanks to you and Allen for your guidance and direction on improving our sampling techniques.

Sincerely,

*R. Spence*

Randy Spence  
Plant Manager  
Millsboro Plant