



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

# Water Compliance Inspection Report

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

Transaction Code 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input type="checkbox"/> 8 <input type="checkbox"/> 9 <input type="checkbox"/> 10 <input type="checkbox"/> 11 <input type="checkbox"/> 12 <input type="checkbox"/> 13 <input type="checkbox"/> 14 <input type="checkbox"/> 15 <input type="checkbox"/> 16 <input type="checkbox"/> 17 <input type="checkbox"/> 18 <input type="checkbox"/> 19 <input type="checkbox"/> 20 <input type="checkbox"/> 21 <input type="checkbox"/> 22 <input type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25 <input type="checkbox"/> 26 <input type="checkbox"/> 27 <input type="checkbox"/> 28 <input type="checkbox"/> 29 <input type="checkbox"/> 30 <input type="checkbox"/> 31 <input type="checkbox"/> 32 <input type="checkbox"/> 33 <input type="checkbox"/> 34 <input type="checkbox"/> 35 <input type="checkbox"/> 36 <input type="checkbox"/> 37 <input type="checkbox"/> 38 <input type="checkbox"/> 39 <input type="checkbox"/> 40 <input type="checkbox"/> 41 <input type="checkbox"/> 42 <input type="checkbox"/> 43 <input type="checkbox"/> 44 <input type="checkbox"/> 45 <input type="checkbox"/> 46 <input type="checkbox"/> 47 <input type="checkbox"/> 48 <input type="checkbox"/> 49 <input type="checkbox"/> 50 <input type="checkbox"/> 51 <input type="checkbox"/> 52 <input type="checkbox"/> 53 <input type="checkbox"/> 54 <input type="checkbox"/> 55 <input type="checkbox"/> 56 <input type="checkbox"/> 57 <input type="checkbox"/> 58 <input type="checkbox"/> 59 <input type="checkbox"/> 60 <input type="checkbox"/> 61 <input type="checkbox"/> 62 <input type="checkbox"/> 63 <input type="checkbox"/> 64 <input type="checkbox"/> 65 <input type="checkbox"/> 66 <input type="checkbox"/> 67 <input type="checkbox"/> 68 <input type="checkbox"/> 69 <input type="checkbox"/> 70 <input type="checkbox"/> 71 <input type="checkbox"/> 72 <input type="checkbox"/> 73 <input type="checkbox"/> 74 <input type="checkbox"/> 75 <input type="checkbox"/> 76 <input type="checkbox"/> 77 <input type="checkbox"/> 78 <input type="checkbox"/> 79 <input type="checkbox"/> 80 <input type="checkbox"/>	NPDES 11	yr/month/day 12 13 04 26 17	Inspection Type 18 <input checked="" type="checkbox"/>	Inspector 19 <input checked="" type="checkbox"/>	Fac Type 20 <input checked="" type="checkbox"/>
Remarks					
Inspection Work Days 67 <input type="checkbox"/> 68 <input type="checkbox"/> 69 <input type="checkbox"/>	Facility Self-Monitoring Evaluation Rating 70 <input type="checkbox"/>	BI 71 <input type="checkbox"/>	QA 72 <input type="checkbox"/>	Reserved 73 <input type="checkbox"/> 74 <input type="checkbox"/> 75 <input type="checkbox"/> 76 <input type="checkbox"/> 77 <input type="checkbox"/> 78 <input type="checkbox"/> 79 <input type="checkbox"/> 80 <input type="checkbox"/>	

## Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) <i>Pinnacle Foods Group, LLC 29984 Pinnacle Way Millsboro, DE 19966</i>	Entry Time/Date <i>4/26/13 0930 hrs</i>	Permit Effective Date <i>11/1/08</i>
	Exit Time/Date <i>4/26/13 1230 hrs</i>	Permit Expiration Date <i>10/31/13</i>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <i>Robert Lynch - DRC Level IV 302-934-3833</i>	Other Facility Data (e.g., SIC NAICS, and other descriptive information)	
Name, Address of Responsible Official/Title/Phone and Fax Number <i>Randy Spence - Plant Mgr. 302-934-3841</i>	Contacted <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

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

<input checked="" type="checkbox"/> Permit	<input checked="" 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 checked="" 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) <i>Nicole Smith Nicole Smith</i>	Agency/Office/Phone and Fax Numbers <i>ANREC 302-739-9946</i>	Date <i>4/26/13</i>
Signature of Management O.A. Reviewer <i>[Signature]</i>	Agency/Office/Phone and Fax Numbers <i>ANREC 302-739-9946</i>	Date <i>5-28-13</i>

Sections F thru L: Complete on all inspections, as appropriate. N/A = Not Applicable

PERMIT NO.  
*DE 0000736*

**SECTION F - Facility and Permit Background**

ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY <i>(Including City, County and ZIP code)</i>	DATE OF LAST PREVIOUS INVESTIGATION BY EPA/STATE <i>7/23/12</i>
	FINDINGS <i>See Report</i>

**SECTION G - Records and Reports**

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.  YES  NO  N/A *(Further explanation attached \_\_\_\_\_)*

DETAILS:

(a) ADEQUATE RECORDS MAINTAINED OF:

(i) SAMPLING DATE, TIME, EXACT LOCATION	<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 <i>(e.g., consistent with self-monitoring report data)</i>	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A

(b) MONITORING RECORDS *(e.g., flow, pH, D.O., etc.)* MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS *(e.g. continuous monitoring instrumentation, calibration and maintenance records)*.  YES  NO  N/A

(c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT.  YES  NO  N/A

(d) FACILITY OPERATING RECORDS KEPT INCLUDING OPERATING LOGS FOR EACH TREATMENT UNIT.  YES  NO  N/A

(e) QUALITY ASSURANCE RECORDS KEPT.  YES  NO  N/A

(f) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES *(and their compliance status)* USING PUBLICLY OWNED TREATMENT WORKS.  YES  NO  N/A

**SECTION H - Permit Verification**

INSPECTION OBSERVATIONS VERIFY THE PERMIT.  YES  NO  N/A *(Further explanation attached \_\_\_\_\_)*

DETAILS:

(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.  YES  NO  N/A

(b) FACILITY IS AS DESCRIBED IN PERMIT.  YES  NO  N/A

(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION.  YES  NO  N/A

(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION.  YES  NO  N/A

(e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES.  YES  NO  N/A

(f) ACCURATE RECORDS OF RAW WATER VOLUME MAINTAINED.  YES  NO  N/A

(g) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT.  YES  NO  N/A

(h) CORRECT NAME AND LOCATION OF RECEIVING WATERS.  YES  NO  N/A

(i) ALL DISCHARGES ARE PERMITTED.  YES  NO  N/A

**SECTION I - Operation and Maintenance**

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.  YES  NO  N/A *(Further explanation attached \_\_\_\_\_)*

DETAILS:

(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED. *No Power/No Flow*  YES  NO  N/A

(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.  YES  NO  N/A

(c) REPORTS ON/ALTERNATE SOURCE OF POWER SENT TO EPA/STATE AS REQUIRED BY PERMIT.  YES  NO  N/A

(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED.  YES  NO  N/A

(e) ALL TREATMENT UNITS IN SERVICE.  YES  NO  N/A

(f) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS.  YES  NO  N/A

(g) QUALIFIED OPERATING STAFF PROVIDED.  YES  NO  N/A

(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS. *OJT, DTCC*  YES  NO  N/A

(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS.  YES  NO  N/A

(j) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT.  YES  NO  N/A

(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED. *Last Review 2/13*  YES  NO  N/A

(l) SPCC PLAN AVAILABLE. *6/15/12*  YES  NO  N/A

(m) REGULATORY AGENCY NOTIFIED OF BY PASSING. *(Dates \_\_\_\_\_)*  YES  NO  N/A

(n) ANY BY-PASSING SINCE LAST INSPECTION.  YES  NO  N/A

(o) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED.  YES  NO  N/A

PERMIT NO.  
DE 0000734

**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 \_\_\_\_\_)  
w/ultrasonic
- (b) CALIBRATION FREQUENCY ADEQUATE. (Date of last calibration 3/13/13)  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. IF NO,  GRAB  MANUAL COMPOSITE  AUTOMATIC COMPOSITE FREQUENCY.  YES  NO  N/A
- (d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE.  YES  NO  N/A
  - (i) SAMPLES REFRIGERATED DURING COMPOSITING ICED  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. Process Control  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. 5/25 % OF TIME.  YES  NO  N/A
- (g) SPIKED SAMPLES ARE USED. 100 % 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 \_\_\_\_\_

Envirocorp Labs  
Harrington, DE

LAB ADDRESS \_\_\_\_\_

PERMIT NO.  
DE 0000736

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

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOL	COLOR	OTHER
001	No	No	No	No	No	CLEAR	—
002	}	No FLOW -					
003			CLEAN & DRY				
004	NO	NO	very slight	NO	NO	Mostly clear	* No FLOW
005-009	No FLOW - CLEAN & DRY						

(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 1x per hour w/ constant flow PRESERVATION ref.

SAMPLE REFRIGERATED DURING COMPOSITING:  YES  NO

SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE yes

\*sampled on 4/25 & 4/26/13

SECTION N - Analytical Results (Attach report if necessary)

- see attached analytical report



**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 <i>Pinnacle Foods Group, LLC Millsboro, DE</i>	Entry Date/Time <i>4/26/13 0930hrs.</i>
Facility Permit No. <i>DE 0000736</i>	Exit Date/Time <i>4/26/13 1230hrs</i>
Facility Contact <i>Bob Lynch</i>	

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) *ALL (002-009)*

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? <i>11/11</i>	<input checked="" type="checkbox"/>		
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?	<input checked="" type="checkbox"/>		
3)	<b>Inspection Records.</b> Are storm water inspections conducted and documented? Please describe. <i>Monthly &amp; annual</i>	<input checked="" type="checkbox"/>		
4)	<b>Monitoring Data.</b> Has the facility performed storm water monitoring as required by the permit?	<input checked="" type="checkbox"/>		
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?		<input checked="" type="checkbox"/>	<i>N/A</i>

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?	<input checked="" type="checkbox"/>		
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?	<input checked="" type="checkbox"/>		
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?	<input checked="" type="checkbox"/>		
4)	<b>Storm Water Pollution:</b> materials being stored in a manner that minimizes their exposure to storm water?	<input checked="" type="checkbox"/>		
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
<i>002,003,005-009</i>	<i>DRY &amp; CLEAN</i>			
<i>004 &amp; NO RUN</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>CLEAR</i>

**COMMENTS**

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Compliance Status At Time of Inspection: *Compliant*

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

Inspector's Printed Name: *Nicole Smith*

Inspector's Signature: *Nicole Smith* Date: *4/26/13*

**Sludge Volume Inventory(gallons)**

Date	digester #1	digester #2	lagoon	total(gallons)	hauled/mo.	wasted(gallons)/mo.
10/1/2009	175,000	250,000	1,700,000	2,125,000	1,133,000	599,220
11/2/2009	75,000	50,000	1,267,000	1,392,000	859,000	436,165
12/3/2009	0	100,000	810,000	910,000	0	138,990
1/4/2010	0	125,000	575,000	700,000	0	212,375
2/1/2010	0	250,000	640,000	890,000	0	374,930
3/1/2010	180,000	100,000	869,930	1,149,930	0	538,980
4/1/2010	0	250,000	900,000	1,150,000	840,000	393,525
5/3/2010	25,000	75,000	275,000	375,000	0	396,605
6/1/2010	125,000	150,000	275,000	550,000	0	204,330
7/1/2010	0	250,000	500,000	750,000	0	515,640
8/2/2010	30,000	225,000	610,000	865,000	0	654,730
9/1/2010	0	250,000	850,000	1,100,000	0	824,670
10/1/2010	200,000	250,000	870,000	1,120,000	672,000	856,480
11/1/2010	125,000	200,000	220,000	545,000	0	660,130
12/1/2010	200,000	0	675,000	875,000	0	370,380
1/4/2011	225,000	200,000	675,000	1,100,000	0	547,470
2/1/2011	225,000	150,000	850,000	1,225,000	0	673,320
3/1/2011	225,000	275,000	850,000	1,350,000	0	633,630
4/1/2011	100,000	275,000	950,000	1,325,000	1,001,000	647,730
5/2/2011	85,000	85,000	350,000	520,000	0	634,920
6/1/2011	0	250,000	535,450	785,450	0	821,730
7/1/2011	200,000	0	975,000	1,175,000	0	696,750
8/1/2011	125,000	125,000	1,350,000	1,600,000	0	711,510
9/1/2011	125,000	250,000	1,125,000	1,500,000	0	668,860
10/3/2011	35,000	250,000	870,000	1,155,000	833,000	789,790
11/4/2011	30,000	250,000	275,000	555,000	0	391,980
12/1/2011	60,000	100,000	325,000	485,000	0	183,160
1/4/2012	0	250,000	325,000	575,000	0	590,760
2/1/2012	40,000	220,000	475,000	735,000	0	564,390
3/5/2012	75,000	250,000	650,000	975,000	0	630,540
4/2/2012	150,000	250,000	550,000	950,000	469,000	691,620
5/2/2012	0	250,000	190,000	440,000	0	641,080
6/1/2012	100,000	100,000	300,000	500,000	0	737,400
7/5/2012	0	250,000	800,000	1,050,000	0	888,750
8/1/2012	75,000	150,000	1,300,000	1,525,000	0	928,140
9/3/2012	100,000	150,000	1,600,000	1,850,000	0	767,110
11/1/2012	150,000	175,000	1,000,000	1,325,000	455,000	410,380
12/1/2012	75,000	125,000	250,000	450,000	154,000	470,600
1/3/2013	150,000	150,000	225,000	525,000	0	508,443
2/1/2013	125,000	250,000	225,000	600,000	0	285,210
3/8/2013	150,000	100,000	400,000	650,000	0	343,890
4/8/2013	150,000	275,000	450,000	875,000	0	



HORNEY INDUSTRIAL ELECTRONICS

*Process Control Technology*

## CERTIFICATE OF CALIBRATION

Date : March 13, 2013

Pinnacle Foods  
29984 Pinnacle Way  
Millsboro DE 19966

Purchase Order: 0710030829

Job#:606999

<u>Manfg.</u>	<u>Serial#</u>	<u>Range</u>
<b>EB Flow:</b> E/H FMU 861	8AR009-E040	0-400 GPM
<b>Raw Flow:</b> F/P 1392 C/R	9508-51045-C03	0-1200 GPM
F/P 50U	95W032110	0-1200 GPM
<b>UV Effluent Flow:</b> F/P 1392 C/R	941140025-803	0-500 GPM
F/P 50U	95W001009	0-500 GPM
<b>Spray Irrigation:</b> H/W DR4500AT C/R	0911Y980723300002	0-400 GPM
Siemens Mag 5000	104213N056	0-400 GPM
Siemens Mag 5100 3" Tube	469113T036	0-400 GPM



HORNEY INDUSTRIAL ELECTRONICS

*Process Control Technology*

**WTB:**

Siemens Mag 5000

Siemens Mag 5100 8"

H/W DR45 C/R

840849N164

289009T254

9932Y92662600001

0-2000 GPM

0-2000 GPM

Pen 1

0-2000 GPM

Pen 2

0-2640 GPM

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



HORNEY INDUSTRIAL ELECTRONICS

Process Control Technology

Bob Lynch

302-228-3015

LN: 001215

# CALIBRATION WORKSHEET

P.O. Box 700 Bridgeville, DE 19933  
Phone (302) 337-3600 Fax (302) 337-8560

Customer Name Pinnacle Foods	Customer PO No. 0710030829
Address 29984 Pinnacle Way	Account No.
City, State, Zip Millboro, DE. 19966	Date 3/13/13
Job Description Calibration	Terms Net 20

Manufacturer	Serial Number	Range	Departure
R/H FMD801 ZW = 5.352 → 5.363	8400092040	0-900	✓ 2.25GPK
F/P 592+500 FP 504	4508-51045003 450032110	0-1200 0-1200	✓ ✓
F/P 592+ F/P 500	9411-40025-803 450001009	0-500 0-500	✓ ✓
SIEMENS 5000 5100 3" 12.12	104215H056 4691151056	0-400	✓
DR45A1	09117980T2530002	0-400	✓
SIEMENS 500	840849N164	0-2000	✓
SIEMENS 5100 8" 105.832	2890097-254	0-2000	✓
DR45AT	99528442662400001 P1 P2	0-2000 0-2000	✓ ✓

Comments	Hours

Service Engineer *Bob Lynch* Date *3/13/13*

Customer Signature \_\_\_\_\_ Date \_\_\_\_\_  
Above work was completed to our satisfaction



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

ENVIRONMENTAL  
LABORATORY SECTION

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

**May 23, 2013**

J. Chris Cleaver  
DW - 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:** 1304030  
**Project Description:** DE0000736 Pinnacle  
**Date Received:** 04/26/2013  
**Time Received:** 11:25

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

Sincerely,

A handwritten signature in blue ink that reads "Kathy A. Knowles".

Kathy A. Knowles  
Laboratory Manager

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



**ANALYSIS REPORT**

<b>ELS Sample Number:</b>	1304030-001	<b>Matrix:</b>	Waste Water			
<b>Client Sample Description:</b>	001	<b>Sampling Method:</b>	Composite			
<b>Site ID:</b>		<b>Date and Time Collected:</b>	4/26/2013			
<i>Test Parameter</i>	<i>Method</i>	<i>Result</i>	<i>Units</i>	<i>Qualifier</i>	<i>LOQ</i>	<i>Analysis Date</i>
<b>Inorganic Nonmetallic Constituents</b>						
Ammonia as N, Total	USEPA 350.1	0.057	mg/L		0.020	05/01/2013
Phosphorus, Total, Alkaline Persulfate	APHA 4500-P-J	1.17	mg/L		0.050	05/15/2013
<b>Organic Aggregate Constituents</b>						
BOD, 5-Day	APHA 5210-B	2.52	mg/L		2.40	05/01/2013
<b>Physical and Aggregate Properties</b>						
Residue, Nonfilterable (TSS)	APHA 2540-D	3	mg/L		2	05/02/2013



## *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	The parameter was detected in the method blank at a concentration that was both above the LOQ and greater than 10% of the sample concentration.
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.
FB	The parameter was detected in the field blank at a concentration that was both above the LOQ and greater than 10% of the sample concentration.
FZ	Samples frozen prior to analysis
I	The reported value is estimated due to the presence of interference.
IM	Instrument malfunctioned; No measurement reported.
J	Analyte present; reported value is estimated; concentration is below the range for accurate quantitation (greater than the MDL, but less than the LOQ).
JH	Result is likely overestimated due to matrix effect.
JL	Result is likely underestimated due to matrix effect.
LOQ	Limit of Quantitation
MDL	Method Detection Limit
N	This flag indicates presumptive evidence of a compound. This flag is only used for TICs, where the identification is based on a mass spectral library search and must be used in combination with the J flag. It is applied to all TIC results. For generic characterization of a TIC, such as chlorinated hydrocarbon, or for an "unknown" (no matches $\geq$ 85%), the "N" flag is not used.
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.
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
TIC	Tentatively identified compound from a GC/MS library search.
U	Compound was analyzed but not detected. The method detection limit is reported.
UR	Unusual result. See narrative for an explanation.
USGS	USGS Gauge
V	Analysis performed after holding time expired.



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## *Qualifier Codes, Definitions, and Abbreviations*

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### **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.





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ENVIRONMENTAL  
LABORATORY SECTION

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

**April 29, 2013**

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

Attention: J. Chris Cleaver

Attached you will find the following Laboratory Results:

<i>Order Number:</i>	1304028
<i>Project Description:</i>	DE0000736 Pinnacle
<i>Date Received:</i>	04/25/2013
<i>Time Received:</i>	11:55

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!*



**ANALYSIS REPORT**

<b>ELS Sample Number:</b>	1304028-001	<b>Matrix:</b>	Waste Water			
<b>Client Sample Description:</b>	001	<b>Sampling Method:</b>	Grab			
<b>Site ID:</b>	001	<b>Date and Time Collected:</b>	4/25/2013 10:10			
<i>Test Parameter</i>	<i>Method</i>	<i>Result</i>	<i>Units</i>	<i>Qualifier</i>	<i>LOQ</i>	<i>Analysis Date</i>
<b>Microbiological Examination</b>						
Enterococcus	USEPA 1600	< 1	cfu/100ml		1	04/26/2013

**ANALYSIS REPORT**

<b>ELS Sample Number:</b>	1304028-002	<b>Matrix:</b>	Waste Water			
<b>Client Sample Description:</b>	001-1	<b>Sampling Method:</b>	Grab			
<b>Site ID:</b>	001-1	<b>Date and Time Collected:</b>	4/25/2013 10:11			
<i>Test Parameter</i>	<i>Method</i>	<i>Result</i>	<i>Units</i>	<i>Qualifier</i>	<i>LOQ</i>	<i>Analysis Date</i>
<b>Microbiological Examination</b>						
Enterococcus	USEPA 1600	< 1	cfu/100ml		1	04/26/2013



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uS	micro siemens; units used to measure conductivity in the field; same as uMhos.





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

Surface Water Discharges Section

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

April 30, 2013

Pinnacle Foods Group, LLC  
Mr. Bob Lynch - Plant Manager  
29984 Pinnacle Way  
Millsboro, DE 19966

Re: Compliance Sampling & Inspection (CSI) - April 26, 2013  
NPDES Permit No. DE-0000736

Dear Mr. Lynch,

On behalf of the State of Delaware, Surface Water Discharges Section, Compliance & Enforcement Branch, I would first like to thank you for your cooperation and assistance during the Compliance Sampling & Inspection (CSI) completed at the facility on April 26, 2013.

Overall, the WWTP housekeeping and the plant operations were very good. Data handling and traceability were found to be very acceptable, and all data and reports requested were produced in a timely manner. All calibration documentation was produced and found to be up to date. Laboratory records, reagents, instrumentation, and methods were found to be within NPDES requirements. You gave a fantastic tour of the facility and are to be complimented on your knowledge of the facility and dedication in keeping the plant operating efficiently and in compliance with NPDES Permit requirements.

The March 2013 DMR was reviewed and all entries were as reported by analytical (both in-house and contract labs), all calculations were correct, and all entries were accurate.

A comprehensive Storm Water Evaluation was also completed during this inspection. All storm water outfalls, except for 004, were clean and dry. Outfall 004 had approximately 12 inches of water in the catchbasin (there was no flow out of the catchbasin). A review of the SWPPP and SPCC Plan showed that all inspections and training are up to date.

*Delaware's good nature depends on you!*

Pinnacle Foods Group, LLC

CSI - April 26, 2013

Page Two

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

Sincerely,

A handwritten signature in blue ink that reads "Nicole L. Smith". The signature is fluid and cursive, with the first name being the most prominent.

Nicole L. Smith

Senior Environmental Compliance Specialist

Compliance & Enforcement Branch

Surface Water Discharges Section

State of Delaware - DNREC

Ecopy: Mr. Bryan Ashby - DNREC

Mr. Glenn Davis - DNREC

**Pinnacle Foods Group, LLC**  
**Wastewater Treatment Plant**  
**Annual Compliance Sampling and Inspection**  
**April 26, 2013**

On Friday April 26, 2013, Nicole Smith of the State of Delaware, Department of Natural Resources and Environmental Control, Division of Water, Surface Water Discharges Section, Compliance & Enforcement Branch, completed a Compliance Sampling and Inspection of the Pinnacle Foods Group Wastewater Treatment Plant (WWTP) in Millsboro, Delaware. Nicole Smith is the Senior Environmental Compliance Specialist for the Compliance & Enforcement Branch

The inspector arrived at the Millsboro, Delaware facility at approximately 0930 hrs. where she met with Mr. Robert Lynch (DRC- Level IV). After a short pre-inspection meeting, the inspector made a thorough inspection of the entire WWTP, including a review of the facility's storm water management practices.

**General**

The Millsboro, Delaware Plant is a former pickling plant that utilizes screening, grit removal, a flow equalization (EQ) tank, a step feed system to the aeration basins, a secondary clarifier, sand filters and UV disinfection. Sludge from the process is sent to aerobic digesters, then to a sludge holding lagoon from which it is removed as needed by Synagro. Pinnacle is no longer processing pickles and receives wastewater for processing from Dogfish Head Brewery, located in Milton, Delaware.

Raw wastewater influent enters the WWTP from two (2) main pump stations on site that pump the wastewater to the headworks, which consists of two (2) static screens, and then flows to a grit chamber for grit removal. Screenings and grit are collected in a dumpster and taken off site to the landfill. Effluent then flows to a lift station for the flow EQ tank (425,000 gal/cap) where it is aerated. From the flow EQ tank, the wastewater flows to a step feed tank which feeds the aeration basin (~1.1MG capacity). After aeration, three (3) clarifier pumps send the flow to the secondary clarifier (~130,000 gal/cap). Prior to the secondary clarifier, the wastewater is treated with polymer to aid in settling. Effluent from the clarifier flows to two (2) Parkson DynaSand filters, then to a Trojan 3000 UV system for disinfection. A V-Notch Weir Box with an ultrasonic sensor is used for flow measurement and the effluent is then discharged to Whartons Branch via Outfall 001.

Waste Activated Sludge (WAS) is sent to two (2) aerobic digesters (250,000 gal cap/each), then to a lined sludge storage lagoon (2MG capacity). Synagro pumps out the sludge as needed for land application. Return Activated Sludge (RAS) is returned to the aeration basin.

There is no backup power at this facility; if there is no power, there is no flow in the WWTP.

**Storm Water Management**

The Pinnacle Foods Group facility has eight (8) storm water outfalls on site. Outfalls 002 and 003 discharges consist of storm water run-off from the area surrounding the railroad tracks and run-off from the brine storage area. Outfall 004 discharge consists of storm water run-off from the loading/unloading area, dumpster pad area, and the area surrounding the vinegar plant. Outfall 005 discharge consists of storm water run-off from a portion of the plant roof, all of process room roof, and the pad surrounding the process room. Outfall 006 discharge consists of storm water run-off from half of the middle warehouse roof. Outfall 007 discharge consists of storm water run-off from half of the new warehouse roof and the truck loading area.

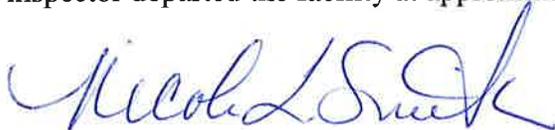
Outfall 008 discharge consists of storm water run-off from half of the middle warehouse roof.  
Outfall 009 discharge consists of storm water run-off from the loading dock and the processing plant roof.

### Violations/Observations/Recommendations

- An inspection of the treated wastewater at the sample point showed that the effluent was clear with no odor, no sheen, no foam, and no floating solids.
- A review of the March 2013 DMR and analytical data showed that all entries were as reported by analytical (both in-house and contract labs), all calculations were correct, and all entries were accurate. All testing methods, holding times, preservations, and container types were verified as conforming to 40 CFR Part 136.
- The inspector requested a sample taken of the WWTP effluent (Outfall 001) at the designated sample point. A pH analysis was run on the sample. The analysis was reported as 7.67, well within the permit limitation of 6.0 – 9.0 standard units. The pH procedures were reviewed with the operator and all buffers used were found to have acceptable expiration dates: 4.0 – 10/13; 7.0 – 8/14.
- The inspector found the housekeeping to be acceptable.
- Sludge records and hauling permits were reviewed and found to be in compliance.
  - Synagro hauling permit DE OH-254 valid 01/11/10-01/10/15
- The Operations & Maintenance manuals were last reviewed/updated in February 2013.
- SPCC plan was last updated June 15, 2012; all inspections and training are up to date.
- SWPPP was last updated November 2011; all inspections and training are up to date.
- The ultrasonic sensor used for flow measurement was last calibrated 03/13/13.
- A thorough inspection of all storm water outfalls produced the following results:
  - Outfalls 002, 003, 005, 006, 007, 008 & 009 were all clean and dry with no flow.
  - Outfall 004 has a catch basin area which had approximately 12" of water, but there was no flow discharging at the time of the inspection.

A short closing meeting was held with Mr. Lynch and all findings were reviewed. He was informed that he would be receiving copies of the inspection follow-up letter and the full inspection report at a later date.

The inspector departed the facility at approximately 1230 hrs.



Nicole L. Smith  
Senior Environmental Compliance Specialist  
Compliance & Enforcement Branch  
Surface Water Discharges Section  
Division of Water  
State of Delaware – DNREC