



October 8, 2010

Ms. Kathleen Cole Harder
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive
Suite 200
Rancho Cordova, CA 95670

Subject: Sacramento Regional County Sanitation District Draft Discharge Permit

Dear Ms. Harder:

Huhtamaki, Inc. has been a sustainable business in the City of Sacramento since 1962. We are a significant industrial user discharging to the Sacramento Regional County Sanitation District (SRCSD), and have been a discharger in good standing since we entered into that agreement. Huhtamaki, Inc. prides itself on being a sustainable company and supports sound environmental objectives that will protect the Sacramento-San Joaquin Delta, which is a valuable economic and environmental resource.

We understand that the Central Valley Regional Water Quality Control Board issued a draft permit to the SRCSD in September 2010 which requires expenditures of approximately \$2 Billion to construct nitrification, de-nitrification, micro-filtration and ultraviolet disinfection facilities. We understand that construction of these improvements is necessary to achieve the overly-restrictive discharge standards specified in the draft permit. The cost of these improvements will ultimately be passed on to residential and industrial consumers in the form of fees that are expected to triple in the immediate future.

First and foremost, our manufacturing facility could not continue to be viable under such an increase in the current economic climate.

Secondly, we, like most industrial dischargers, do not contribute any nitrogen or pathogens to the SRCSD treatment facilities. We expect that if we are prompted to pay for these improvements, we would petition the SRCSD to be exempted due to our lack of contribution to the cause. Unfortunately, the burden of these expenses would then be passed on to residents in the area.

Third, we understand that the discharge standards being required by the draft permit are unusually stringent compared to other discharge standards in the State of California, to the extent that the maximum daily load allocation being imposed upon SRCSD is effectively zero. In particular the use of a 1-in-10,000 risk level for pathogens is not viewed as appropriate. We have reviewed the Sacramento River and San Joaquin River Basin Plan issued September 2009 and the Plan does not contain any specific requirements for such restrictive load allocations. In fact the Basin Plan references the typical process for determination of load allocations - through listing a waterbody for a

pollutant of concern through Section 303(d) of the Clean Water Act, followed by determination of a load capacity for the pollutant of concern, and finally distribution of load allocations to all NPDES dischargers to the waterbody. This process of defining a Total Maximum Daily Load (TMDL) for a waterbody is also typically a public process, where impacted dischargers are allowed to comment on the TMDL development document. We have seen no such public process, and believe that the discharge standards being imposed upon SRCSD are therefore not reasonable and necessary.

In summary, we believe the permit as currently drafted is too restrictive, does not represent a cost effective solution to an overstated risk, and should be reconsidered.

Respectfully submitted,



Robert Braun
Senior Process Engineer/
Environmental Coordinator
Huhtamaki, Inc. - Sacramento



Robert A. Steeves
Environmental Manager
Huhtamaki, Inc.