



Pure Quality Since 1963

NIAGARA
WATER

2560 E. Philadelphia St.
Ontario, CA 91761
(909) 980-9493, (951) 346-5649 Facsimile
www.niagarawater.com

September 22, 2008

VIA EMAIL only

Ms. Gayleen Perreira (g.perrira@waterboards.ca.gov)
James D. Marshall, P.E. (jdmarshall@waterboards.ca.gov), and
Board Members of the California Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, California 95670-6114

RE: NIAGARA BOTTLING, LLC, GENERAL BUSINESS MATTERS
Subject: Comment letter regarding proposed NPDES permit for the City of Stockton

Dear Ms. Perreira, Mr. Marshall and Board Members:

Thank you for accepting these comments on the proposed NPDES permit for the City of Stockton. Please receive this comment letter in support of the proposed permit.

We are a bottled water manufacturer with four (4) California locations, one of which is within the City of Stockton. We currently employ and support more than sixty families in San Joaquin County and we are an excellent corporate citizen. As a bottled water manufacturer, our discharge is made up primarily of effluent from our Reverse Osmosis units. Therefore, one of our biggest concerns when looking at any proposed permit is the imposition of limitations on Total Dissolved Solids ("TDS"). Although the proposed permit does not place any specific limit on TDS, it does require the City of Stockton to monitor TDS and salinity and to implement a salinity reduction plan. Such a plan directly relates to TDS and therefore directly relates to our operation.

We think it is important to illuminate the fact that the City of Stockton currently imposes restrictions on its dischargers relative to TDS, even though the State Board does not currently impose such restrictions. As you are aware, the city is currently complying with the proposed effluent limitations for salinity and we hope the State Board is impressed with the initiative that the City has taken with imposing even more stringent requirements on its dischargers than is required by the Board.



Pure Quality Since 1963

NIAGARA
WATER

2560 E. Philadelphia St.
Ontario, CA 91761
(909) 980-9493, (951) 346-5649 Facsimile
www.niagarawater.com

We support the proposed Order, as is, and urge the State Board not to impose any more stringent restrictions on the City of Stockton. Imposition of more stringent salinity limitations and or any limitation on TDS would be fatal to our operations in Stockton.

We appreciate the time and effort that the staff of the State Board dedicated to developing and preparing the proposed permit. Thank you for consideration of these comments. We look forward to answering any questions you may have.

Respectfully,

/s/ Pamela Anderson

Pamela Anderson
Niagara Bottling, LLC

panderson@niagarawater.com

PJA