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Campbell Soup Supply Company L.L.C.
6200 Franklin Blvd.
Sacramento, CA 95824-3499

October 7, 2010

Via U.S. Mail and Electronic Mail

Mr. Kenneth D. Landau, Assistant Executive Officer
Regional Water Quality Control Board,
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114
kenneth.landau@waterboards.ca.gov

Dear Mr. Landau:

We appreciate the opportunity to comment on the adoption of the renewed NPDES Permit for the Sacramento Region Wastewater Treatment Plant. Campbell Soup Company, a global manufacturer of simple meals, baked snacks, and healthy beverages, has operated a major food manufacturing facility in Sacramento continuously since 1947, making soups, beverages, and sauces for distribution to consumers throughout the western United States and for export throughout the Asia Pacific region. We continuously strive to maintain and responsibly enhance our competitiveness by improving our operations. We aim to keep operating costs as low as possible while driving improved environmental and sustainability performance. In our sector, we are a leader in environmental stewardship. We are also one of the few remaining large food processors in the region.

Our manufacturing output amounts to approximately \$344 million dollars per year, and we provide jobs for up to 880 associates in Sacramento. Using the commonly accepted multiplier of \$523,000 of indirect economic activity per \$1 million of output, we estimate that our operations have an overall economic impact of \$524 million per year in the immediate Sacramento area. In addition, using another commonly accepted economic multiplier of 6.23 indirect jobs created per \$1 million of output, we believe that our facility supports up to 3,200 indirect jobs in the Sacramento area.

Having attended briefings put on by the Sacramento Regional County Sanitation District ("SRCSD"), we understand that the advanced treatments mandated under the SRCSD Tentative Discharge Permit would result in the tripling of our sewer rates. As one of SRCSD's two largest customers, we would face an annual increase of over \$2 million to our cost of doing business. An increase of such magnitude in just one of our many operating costs will challenge our ability to remain competitive.

We strive to compete efficiently with other food companies. However, we also need to remain cost competitive within Campbell's nationwide manufacturing network, in order to retain our current product volume. Perhaps more importantly, our facility must remain cost competitive if we are to attract the new and innovative products that our Company is planning to introduce to the marketplace. Our California region is already challenged to meet the cost of doing business in other regions, and this proposed sewer rate increase will be just one more aspect of doing business in Sacramento that puts us at a disadvantage to other geographic regions in the country.

Requiring the SRCSD to make \$2 billion worth of treatment upgrades would result in overly burdensome cost increases for all ratepayers, with unproven and possibly negligible benefits. Having read extensively through the background material that SRCSD provides online, which cites numerous studies, agency documents, and media reports, we believe that the advanced treatment that the draft permit requires is based in large part on science that is inconclusive and therefore insufficient to provide a basis for informed regulatory decisions. In addition, we believe that this permit goes beyond what is "reasonable and necessary" under the Clean Water Act, and is not based on either a documented public health risk or existing standards/criteria. The potential improvements to the environment and public health, which are at best uncertain, have not been appropriately balanced against the significant cost to the community.

We respectfully request that you reconsider your plans to go ahead with the proposed treatment requirements under the new permit. We ask that you take the time to develop a different set of requirements based on a careful, balanced risk assessment, one that fully accounts for the potential economic impact to our region. We ask that you carefully weigh the potential for environmental and public health benefits against the onerous economic burdens that would be imposed by these rate hikes. We would be pleased to work with you to modify this proposal in a manner that truly enhances water and environmental quality while preserving jobs and economic competitiveness for the region's economy and working families.

Sincerely,

A handwritten signature in black ink that reads "Brett Buatti". The signature is written in a cursive, flowing style.

Brett Buatti
Vice President, Manufacturing
Campbell Soup Company, Sacramento Operations