DEL MONTE FOODS

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April 29, 2011

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

SUBJECT: Comment Letter – Draft Industrial General Permit

Dear Ms. Townsend:

Del Monte Corporation (Del Monte) has reviewed the Draft Statewide General National Pollutant Discharge Elimination System (NPDES) Permit for the Discharge of Storm Water Associated with Industrial Activities (hereinafter referred to as "IGP") issued for public comment on January 28, 2011.

Before discussing individual items in the proposed IGP that concern us, we want to thank you for holding the informal staff workshop in Sacramento on February 14, 2011. We found this workshop very helpful, but we were also concerned that staff at the meeting was not able to fully articulate all of proposed permit requirements. At best, we view the proposed permit as a first draft that falls far short of readiness for consideration by the Water Board and/or for statewide implementation.

It is particularly concerning to us that a new IGP permit would be advocated without first conducting appropriate scientific evaluations on existing storm water quality data, without reviewing and benchmarking other storm water programs in other states, without determining complete economic impacts, without considering industry specific group affects and, most importantly, without involving stakeholder experts in appropriate efforts to ensure the development of appropriate, scientifically, sound changes to existing safeguard procedures related to the management of industrial storm water.

Moreover, it is unclear to us why the Water Board would proceed to so quickly issue an incomplete draft IGP that is inadequate for public review/comment given that there is no evidence of any direct imminent threat to the public or the environment because of ongoing industrial storm water discharges.

Our comments on the IGP are provided below for your consideration. For ease of review, our comments are presented as general and permit specific comments. We hope that you find our comments constructive and helpful.

GENERAL COMMENTS

Essential Numeric Action Level Stakeholder Working Group

The proposed numeric action levels (NALs) and corrective actions (Levels 1 – 3) are the core of the permit and need to be reasonable from not only a regulatory perspective, but also from a technical, cost benefit, and social standpoint. Because so much is at stake with respect to the action levels/corrective actions a working group (representing key state industries, government, academia, and other stakeholders) should be charged with development of appropriate, scientifically, sound changes to the existing safeguard procedures related to the management of industrial storm water. It is paramount that any new action levels be science-based, facts-driven, and not based on worst-case scenarios. Further, we think it is important to note that the "Storm Water Panel Report[1]" recommended the use of California data (or National data if it could be shown applicable to CA) in setting Numeric Limits and Action Levels. In so far as we are aware, this panel recommended analysis was not completed in setting the numeric action levels in the draft IGP.

Additional Public Input

We strongly urge the Water Board to re-evaluate the numeric action levels and corrective actions in the IGP and not rush to issue the IGP until all stakeholder and scientific perspectives have been more carefully analyzed particularly given that there is no imminent threat to the health of the public or the environment because of existing industrial storm water discharges. If anything, the public comment period for the IGP should be extended and more feedback sought from stakeholders.

Review and Analysis of Existing Statewide Storm Water Quality Data

A detailed review and analysis of existing statewide storm water quality data that has been collected since 1997 should be completed by the Water Board before imposing any new action levels and/or pollution control requirements as recommended by the Storm Water Panel (see Page 19 of the Storm Water Panel Report). This analysis must be done to fully identify data gaps, identify any on-going water quality concerns, and accurately gauge existing statewide practices/efforts to "clean-up" industrial storm water discharges. If we do not establish a baseline, how can we track existing and/or future progress? Further, this review and analysis is needed to fully understand the potential risks to water quality that existing industrial storm water discharges may actually pose. For example, the analysis may show that industrial storm water discharges now represent a relatively low risk to overall statewide surface water quality. This risk analysis could then be used to formulate science-based and facts-driven statewide storm water pollution prevention policies and procedures (this allows balanced policies to be developed without reliance on unfounded suppositions and worst-case scenarios).

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[1] Storm Water Panel Recommendations to the California State Water Resources Control Board. June 19, 2006. The Feasibility of Numeric Effluent Limits Applicable to Discharges of Storm Water Associated with Municipal, Industrial and Construction Activities.

More Consideration Given to Key Recommendations Provided in the Storm Water Panel Report

The Water Board should dissect the Storm Water Panel Report again and consider incorporating more of the recommendations provided in the Panel Report in the IGP. Recommendations in the report that we support include:

- The Panel recognizes the need to make progress in monitoring and reducing storm water discharges from industrial facilities, but urges the Board to consider the total economic impact and not unduly penalize California industries with respect to industries outside California.
- The Panel recognizes the inadequacy of current monitoring data sets and recommends improved monitoring to collect data useful for establishing Numeric Limits and Action Levels.
- Required parameters for monitoring should be consistent with the type of industrial activity.
- In so far as possible, the Panel prefers the use of California data (or National data if it can be shown to be applicable to CA) in setting Numeric Limits and Action Levels.
- Regardless of Action Levels or Numeric Limits, the permittees should implement a suite of minimum BMPs – good housekeeping, employee training, preventing materials from exposure to rain, etc.

Training Qualifications and Certification

We agree that qualified individuals should be involved in the development of Storm Water Pollution Prevention Plans (SWPPPs) and in implementing SWPPPs. However, based on our experience, many scientific disciplines outside those listed in the draft IGP (including registered soil scientists, environmental scientists, and engineers/geologists/landscape architects not specifically registered in CA) are well qualified to prepare SWPPPs and to implement SWPPPs. Accordingly, we question the basis for stipulating in the IGP that only certain professional disciplines may prepare SWPPPs (particularly given the fact that such a restrictive requirement is not found in the United States Environmental Protection Agency [USEPA] "Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activities [MSGP][2]," as well as in most other state storm water general permits). Accordingly, the permit should be rewritten to allow all individuals who pass a Water Board-sponsored or approved training course to prepare and implement SWPPPs.

PERMIT SPECIFIC COMMENTS

Part I, General Finding A15, Page 3

This finding references the Nationwide Urban Runoff Program (NURP) research project completed by the USEPA between 1979 and 1983, and states the project report found that urban and industrial runoff are major sources of pollutants to waters of the United States in all states.

[2] United States Environmental Protection Agency (USEPA). Permit Effective September 29, 2008. National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP).

Comment

How does this 28 year old study relate to current industrial storm water quality in CA? Have improvements been realized in CA since 1983? Has the Water Board completed a comprehensive analysis of the costly data that industry has been collecting since 1997? If so, what does the data demonstrate? How does this data relate to proposed NALs? How many dischargers may not be in compliance with the proposed NALs when the new permit takes effect? Does the data show that some testing parameters can be eliminated in renewal of the IGP (for example, if only a small number of existing state-wide storm water quality samples exceed an applicable benchmark/ NAL)?

Part I, NALs and NELs Finding E39, Page 6

This finding suggests that the Storm Water Panel Report fully supports the NALs and NELs found in the proposed IGP. Specifically, the finding indicates that the State Water Board evaluated the expert panel's suggestions for the General Permit, and has included NALs for all storm water discharges and a tiered compliance strategy that imposes NELs for facilities with recurring NAL trigger exceedances.

Comment

We submit that this finding does not conclusively nor does it accurately detail the observations and/or recommendations of the Industrial Storm Water Panel in regard to NALs and NELs in the IGP. More specifically please note that the panel report indicates: *"To establish Numeric Limits for industrial sites requires a reliable database, describing current emissions by industry types or categories, and performance of existing BMPs. The current industrial permit has not produced such a database for most industrial categories because of inconsistencies in monitoring or compliance with monitoring requirements. The Board needs to reexamine the existing data sources, collect new data as required and for additional water quality parameters (the current permit requires only pH, conductivity, total suspended solids and either total organic carbon or oils and grease) to establish practical and achievable Numeric Limits."* In so far as we are aware, the Water Board has not closely examined existing data sources required for proper setting of practical and achievable numeric limits as recommended by the Storm Water Panel (particularly for inclusion in an overreaching state-wide general permit). Accordingly, existing quality databases and BMPs need to be closely benchmarked/examined before the setting of any NELs in a re-issued IGP.

Part I, NALs and NELs Finding E47, Page 7

If a discharger fails to take the appropriate corrective action, then the applicable NAL will become a Numeric Effluent Limitation that subjects the discharger to Mandatory Minimum Penalties.

Comment

This condition is unreasonable for inclusion in a General Permit and should be removed. In addition to restricting a discharger's ability to legally and technically defend themselves, we suspect that this permit condition would result in unnecessary and costly citizen law suits (that would ultimately divert limited public and private resources that could be better spent on correcting real pollution problems at sites). Further, note that a condition of this magnitude is

not found in the USEPA MSGP and/or may be found in most other state storm water general permits.

Part I, Receiving Water Limitations, Finding F49, Page 8

This General Permit requires dischargers operating facilities that discharge to 303(d) listed impaired waters to evaluate potential industrial pollutants that are related to the impaired receiving waters and to analyze for additional sampling parameters. Attachment F of this General Permit provides a list of 303(d) impaired waters.

Comment

Has the Water Board prepared a comprehensive list of the plants/businesses that would be impacted by more stringent Total Maximum Daily Load (TMDL) and 303(d) limitations? This is typically how it is done in other states, to help dischargers comply and easily determine additional sampling parameters that may apply to their discharges.

Part I, Training, Finding G50, Page 8

In order to improve compliance with and to maintain consistent enforcement of this General Permit, all dischargers are required to appoint two positions – the Qualified SWPPP Developer (QSD) and the Qualified SWPPP Practitioner (QSP) – both of whom must obtain appropriate training. Together with key stakeholders, the State and Regional Water Boards are leading the development of this curriculum through a collaborative organization called The Industrial General Permit Training Team. The QSD and QSP training programs will include an exam to demonstrate competency.

Comment

Please refer to our general comments above in regard to training qualifications and certification. In regard to the curriculum for QSDs and QSPs and The Industrial General Permit Training Team, we never received official notice that such a team had been formed. Who makes up this team? Under what legal/regulatory basis will this training team operate? Has the team had any meetings yet? Has a draft curriculum been published and distributed to all stakeholders? Nevertheless, we think that it is very important that any curriculum that may be developed be subject to public review/comment. This is particularly true if it will be specifically referenced and mandated by the IGP.

Part I, Training, Finding G51, Page 8

The Professional Engineers Act (Bus. & Prof. Code Section 6700, et. seq.) requires that all engineering work must be performed by a California registered professional civil engineer.

Comment

It is not clear how the Professional Engineers Act specifically applies to the various activities and submittals required under the IGP. In particular, the IGP Attachment K does not define what constitutes "engineering work." Further, based on our experience, California registered professional civil engineers are not necessarily the only qualified professionals to complete work as outlined in the IGP (particularly as it may apply to proper and innovative design of storm water treatment systems and G-SIRT). Moreover, the USEPA MSGP does not include any requirements indicating that only professional civil engineers may perform SWPPP work.

Accordingly, this finding should be removed from the permit and/or be fully supported factually and legally.

Part I, Conditional Exclusion – No Discharge Certification, Finding L59, Pages 9-10

This General Permit contains a conditional exclusion for all dischargers that certify that their facilities do not discharge storm water associated with industrial activity up to a 100-year, 24-hour storm event…

Comment

No clear scientific, regulatory, or legal basis for requiring this strict certification (no discharges up to a 100-year, 24-hour storm event) has been provided by the Water Board. Note that this strict design storm criterion is not listed in the USEPA MSGP and/or in most state storm water general permits. Has a storm event of this magnitude been scientifically benchmarked by the Water Board? Are we sure that this design storm event is balanced and not overly restrictive?

Part I, Conditional Exclusion for Dischargers that Implement Green Storm Water Impact Reduction Technology (G-SIRT), Finding M60, Page 10

The State Board finds that dischargers that decrease runoff (effluent) volume and pollutant dischargers in accordance with the G-SIRT design standards should be provided significant regulatory relief as they provide additional beneficial uses of the waters of the United States and the State of California…

Comment

The Water Board has not provided any scientific data supporting this finding. In fact, the draft IGP did not include any G-SIRT standards for comment. In principal, we agree and support G-SIRT, but such requirements should not be included in any permit until they are supported scientifically and have been fully vetted. These design standards should ideally be developed and presented in a newly issued draft IGP for public comment/ review.

Part II, Existing Dischargers Covered Under 97-03-DWQ, Condition Q3, Page 12

Existing dischargers shall revise and implement necessary revisions to their SWPPP and Monitoring Program in accordance with Section VIII. Revisions shall be made in a timely manner but no later than ninety (90) days after the adoption of the General Permit…

Comment

This condition is unreasonable particularly if the Water Board will insist that SWPPPs be developed and certified only by CA registered professional civil engineers. If a professional engineer will have to be retained to complete these plans, most businesses will have to plan and budget for this work well in advance since the fees charged by professional engineers can be substantial. Further, the Water Board has yet to even start the process to define the curriculum for QSDs. Accordingly, we request that this condition be modified to allow existing dischargers up to one-year or more to revise their SWPPPs to comply with any new IGP requirements.

Part V, Effluent Limitations, Condition D, Page 15

Dischargers in Corrective Action Level 3 (Section XVII.D) are subject to a numeric effluent limitation (NEL) that will be the same numeric value as the applicable pollutant NAL. A daily average exceedance of the NEL is a violation of this General Permit and may subject the discharger to mandatory minimum penalties.

Comment

The Water Board has not provided a strong scientific and legal basis for including this very strict proviso in the IGP. Conditions of this magnitude are typically included in individual NPDES permits and not in General Permits. Again, please note that a condition of this magnitude is not found in the USEPA MSGP and/or may be found in most other state storm water general permits.

Part V, Effluent Limitations, Compliance Storm Event Condition E3, Page 15

This General Permit establishes a 10-year, 24-hour (expressed in inches of rainfall) Compliance Storm Event for Total Suspended Solids. In addition, all treatment BMPs for any other pollutants shall be designed for no less than a 10-year, 24-hour storm event...

Comment

The Water Board has not provided a scientific, technical or legal basis for the design 10-year, 24-hour storm event (particularly as it applies to treatment BMPs for pollutants other than Total Suspended Solids). Therefore, we request that this condition be removed from the permit unless the basis can be factually and scientifically supported.

Part VI, Receiving Water Limitations, Condition D, Page 15

Dischargers located within the watershed of a CWA § 303(d) impaired water body, for which a TMDL has been approved by the USEPA, shall comply with the approved TMDL if it identifies "industrial activity" or industrial-related activities as a source of the pollution.

Comment

Does the Water Board intend to regularly notify potential affected individual industrial dischargers when a new impaired and/or TMDL water body is identified by USEPA and/or the Water Board during the term of this permit? Or, does the Water Board expect individual industrial dischargers to completely shoulder this responsibility during the term of this permit on an on-going basis?

Part VII, Training Qualifications and Certification, Condition B1, Page 16

This condition stipulates that only certain licensed professional specialties shall prepare SWPPPs (including only CA registered professional civil engineer; CA registered professional geologist or engineering geologist; CA registered landscape architect; and professional hydrologist registered through the American Institute of Hydrology).

Comment

Please refer our previous general comments in regard to training qualifications and certifications. We submit that other scientific/professional disciplines are equally qualified to develop and prepare SWPPPs (including among other scientific disciplines Certified Professional Soil

Scientists). Accordingly, the permit should be rewritten to allow all individuals who pass a Water Board-sponsored or approved training course to prepare and implement SWPPPs. Further, it has been our experience, that when local plant operators are fully involved in the development of SWPPPs they actually get implemented. Consultants certainly may play a role here (particularly at difficult and/or sensitive industrial sites), but should only be required to be brought into the process as needed when a difficult treatment system may have to be designed and/or built to meet discharge limits. In general, it is our opinion that most SWPPPs can be adequately developed and designed by local industrial operators (particularly if the Water Board plans to design a robust/ thorough QSD training program).

Part VIII, Storm Water Pollution Prevention Plan Requirements, Implementation Schedule Condition B, Page 17

Existing dischargers with permit coverage under State Water Board Order No. 97-03-DWQ, shall continue to implement their existing SWPPP and shall implement any necessary revisions to their SWPPP no later than ninety (90) days after the adoption of the General Permit.

Comment

Please refer to our previous comments in regard to this very restrictive implementation schedule. Existing dischargers should be given one or more years to update/ revise their SWPPPs particularly if these plans can only be drafted by QSDs. Further, as far as we are aware, the Water Board has not even started to develop an approved training course and/or would even be prepared to start a training program upon adoption of a revised IGP (specifically the permit indicates that QSD training may occur over a one-year period).

Part VIII, Storm Water Pollution Prevention Plan Requirements, Best Management Practices (BMPs), Good Housekeeping Condition H.1.a.i, Page 23

Inspect weekly all outdoor areas associated with industrial activity, storm water discharge locations…

Comment

Detailed/ documented weekly inspections are excessive and unnecessary at most well maintained industrial plants/ operations that have properly trained their employees and this should be particularly true if the Water Board intends to design a robust/ thorough QSP training program. In our opinion, monthly inspections are more than adequate at most industrial plants to ensure good housekeeping BMPs are being fully implemented in all areas of a plant/ facility site.

Part VIII, Storm Water Pollution Prevention Plan Requirements, Best Management Practices (BMPs), Preventative Maintenance Condition H.1.b.ii, Page 23

Inspect weekly each of the identified equipment and systems to detect leaks or identify conditions that may result in the…

Comment

In our opinion, no more than monthly inspections should be necessary to ensure preventative maintenance practices are being followed at most industrial plants/ sites (this is particularly true at those industrial sites/ plants that operate under SPCC and other mandated spill plans and have properly trained their employees).

Part VIII, Storm Water Pollution Prevention Plan Requirements, Best Management Practices (BMPs), Erosion and Sediment Controls Condition H.1.g.iv, Pages 25 – 26

At sites where sediment basins are used, dischargers shall, at a minimum, design sediment basins according to the method provided in CASQA's Industrial and Commercial BMP Guidance Handbook and satisfy the 10 year, 24-hour compliance storm event requirement.

Comment

We have closely reviewed the California Stormwater Quality Association's (CASQA's) Industrial and Commercial BMP Guidance Handbook (January, 2003) and this handbook does not include a specific method for proper design of sediment basins. Should this condition be rewritten to indicate that sediment basins should be designed according to CASQA's Construction BMP Guidance Handbook, Fact Sheet SE-2, Sediment Basin?

Part IX, Monitoring Requirements, Storm Water Discharges Visual Monitoring Conditions C4 and C6, Pages 29 and 30

Prior to any anticipated storm event, dischargers shall visually observe…

Comment

In theory, visual inspections of operations immediately before a storm event make sense. However, in practice, they will be very difficult to routinely complete and meet permit compliance (particularly given the fact that the draft IGP does not provide standards for permittees to follow to anticipate storm events). Further, we question why these additional overly restrictive inspections would even be required if plants/operations are completing the routine visual inspections required per Part VIII, Sections H and I of the permit that require routine weekly, quarterly and annual facility inspections. Accordingly, we request that visual monitoring requirements C4 and C6 be removed from the permit in that they are duplicative and particularly problematic from an implementation and legal perspective.

Part X, Sampling and Analysis Requirements, Condition H.1, Page 31

This condition requires all dischargers to sample/test for total suspended solids (TSS), pH, specific conductance (SC), and oil and grease (O&G).

Comment

The requirement to sample/test for oils and grease (O&G) should be removed from the permit. In practice, O&G problems are more appropriately addressed through visual assessments. Specifically, by the time laboratory results are available, the event causing the probably will have likely ended.

Part X, Sampling and Analysis Requirements, Condition K, Page 32

Field measurements for pH and TSS shall be performed on each sample collected using a calibrated portable instrument.

Comment

Total suspended solids cannot be measured in the field. Accordingly, consistent with Table 1 of the permit this condition should be rewritten as follows: "Field measurements for pH and EC shall be performed on each sample collected using a calibrated portable instrument."

Part XI, Sampling and Analysis and Reporting, First Paragraph, Page 32

The discharger shall electronically report through SMARTS all analytical results within 30 days of obtaining the results…

Comment

Dischargers should be provided at least 45-days to electronically report analytical data through SMARTS. This extra time will allow dischargers to inter-face with testing laboratories and to rectify any QA issues/problems that may be discovered upon receipt by the analytical data before it actually has to be posted for full public display.

Part XVI, Sampling and Analysis Reduction, Pages 37-38

This condition indicates that any discharger may be eligible to gain a sampling reduction (quarterly to annual sampling) when 10 consecutive storm water quality samples are collected and all of the sampled storm events pass defined NAL Corrective Action Triggers.

Comment

This condition is overly restrictive when compared to the USEPA MSP that allows dischargers to suspend all sampling for the permit term following four quarters of benchmark monitoring, if the average of the four monitoring values does not exceed the benchmark. If anything, this condition should be rewritten to indicate that the discharger may suspend sampling for one or more listed NALs when the average of five consecutive samples is equal to or less than the NAL, other than for pH.

Part XVII, Corrective Actions, Pages 38 – 43

This part of the permit describes corrective actions (Levels 1, 2, and 3) that need to be taken by the discharger whenever storm water quality does not meet defined NAL Corrective Action Triggers.

Comment

The corrective actions as written are among other things: 1) overly restrictive; 2) confusing; 3) fail to account for the inherit difficulties in sampling storm water; and 4) most importantly do not provide the time needed for dischargers to systematically make site changes and to validate the effects of these changes on storm water quality before having to possibly implement costly treatment that may or may not work in the end (particularly in the case of achieving very low metals concentrations in storm water discharges).

For the reasons cited above, we urge the Water Board to completely re-think the corrective active levels and in particular the rather short/abrupt pathway for dischargers to reach Level 3/ Imposition of Numeric Effluent Limits. In general, we urge the Water Board to consider the following in re-drafting the corrective actions:

- The IGP does not need to include more restrictive adaptive corrective actions than those provided in the USEPA MSGP. Specifically, without convincing evidence that on-going state industrial storm water discharges represent a direct imminent threat to the public or the environment, the IGP should not impose NELs (NELs should only be issued through individual NPDES permits to problem industrial sites).

- During this permit cycle, efforts should be focused on collection of scientifically valid storm water quality data, developing an understanding of seasonal variations in storm water quality at sites, identifying problem areas at sites, improving storm water pollution prevention plans, better employee training, and the formulation of technically sound, cost-effective, and low maintenance measures to correct pollution problems at sites.
- Storm water discharged from industrial sites is not like process wastewater discharged from a carefully operated and controlled treatment plant with a distinct discharge point. Therefore, appropriate BMPs cannot be designed and/or be benchmarked at industrial sites without the collection of a sufficient amount of storm water quality data (including properly collected baseline data). In other words, when a new BMP is implemented at a site to correct a possible storm water quality problem, at least two or more years of data (at least eight data points) are really needed to properly assess the effect of the change. Accordingly, the response timelines for Levels 1 and 2 are much too short and do not allow dischargers to systematically make changes at their operations and to validate these changes before being pushed into Level 3.

Part XXI, Conditional Exclusion – No Exposure Certification Requirements, Pages 44 - 48

This part of the permit indicates that on an annual basis no exposure plants/facilities will have to inspect and certify that their operations continue to qualify for no exposure exclusion as well as pay an annual fee.

Comment

The Water Board has not presented a strong and convincing argument for inclusion of this restrictive condition in the IGP. Consistent with the USEPA MSGP as well as most other state storm water general permits, plants/facilities should only be required to renew NECs once every five years (matching the five-year renewal cycle of NPDES permits).

Part XXII, Conditional Exclusion – No Discharge Certification Requirements, Page 48

This part of the permit indicates that only a facility that is engineered to contain and not subsequently discharge storm water generated by a 100-year, 24-hour storm event may qualify for a "Conditional Exclusion – No Discharge Certification."

Comment

Please refer to our previous comments above in regard to this standard. We remain that this strict standard should be removed from the permit or be fully supported from a scientific, regulatory, and legal basis.

Part XXIII, Conditional Exclusion for Dischargers that Implement Green Storm Water Impact Reduction Technology (G-SIRT), Pages 48 - 49

This part of the permit defines G-SIRT requirements and standards but is incomplete (with G-SIRT Standards apparently still in development).

Comment

Please refer to our previous comments in regard to G-SIRT. Since the IGP indicates that the G-SIRT standards are still being developed, we assume that the Water Board intends to re-issue a revised IGP for public comment including the proposed G-SIRT standards. In principal, we support G-SIRT and look forward to reviewing the new standards when they are finalized and available for public review/comment.

We appreciate your consideration of our comments and urge you not to rush into issuing a revised IGP. Further, we urge you to consider extending the public comment period for the permit particularly if it is your intention to impose overreaching NELs. If you have any questions, please do not hesitate to contact me at tim.ruby@delmonte.com or at (925) 944-7318.

Sincerely,

DEL MONTE CORPORATION

Timothy P. Ruby
Environmental Water Manager

c: Jan Marie Ennenga, Manufacturers Council of the Central Valley
Trudi Hughes, California League of Food Processors