

FEDERAL EXPRESS

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permit limits that Boeing has little or no control over. The analytical results included with this report continue to provide evidence of the technical limitations inherent in setting stringent water quality limits for storm water releases. It supports Boeing's position that limits were established without sufficient data concerning other sources and/or establishment of background conditions. This position is also supported by the California Policy for the Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California (the SIP) which specifies that the policy does not apply "to regulation of stormwater discharges". It is noted that the limits that Boeing is required to meet stem from this document.

Notwithstanding these issues, the RWQCD is required to issue a permit for Boeing's stormwater discharge.

In reviewing the analytical results of surface water samples from this and previous

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Sulfate Discussion

Sulfate was detected at Outfall 002 on April 1, 8, 15, and 22 at concentrations of 310, 360, 400, and 400 mg/L, respectively, as compared to its permit limit of 300 mg/l. Sulfate is a naturally occurring mineral which has been well within limits over the years based on a review of the extensive history of compliance at this location. Since these elevated levels occurred at the same time that the facility experienced significant rainfall it is surmised that the source of the sulfate is from a seep or spring which contained a naturally occurring pocket of a sulfur compound. This seems to prove out with additional investigative sampling that occurred earlier in the year identifying the source to be from one localized area in an undeveloped portion of the facility. Further observations will be conducted to validate this theory. It is anticipated that sulfate concentrations will decrease at Outfall 002 as conditions return to those that prevailed prior to the excessive rainfall from the 2004-2005 rainy season.

Total Dissolved Solids (TDS) Discussion



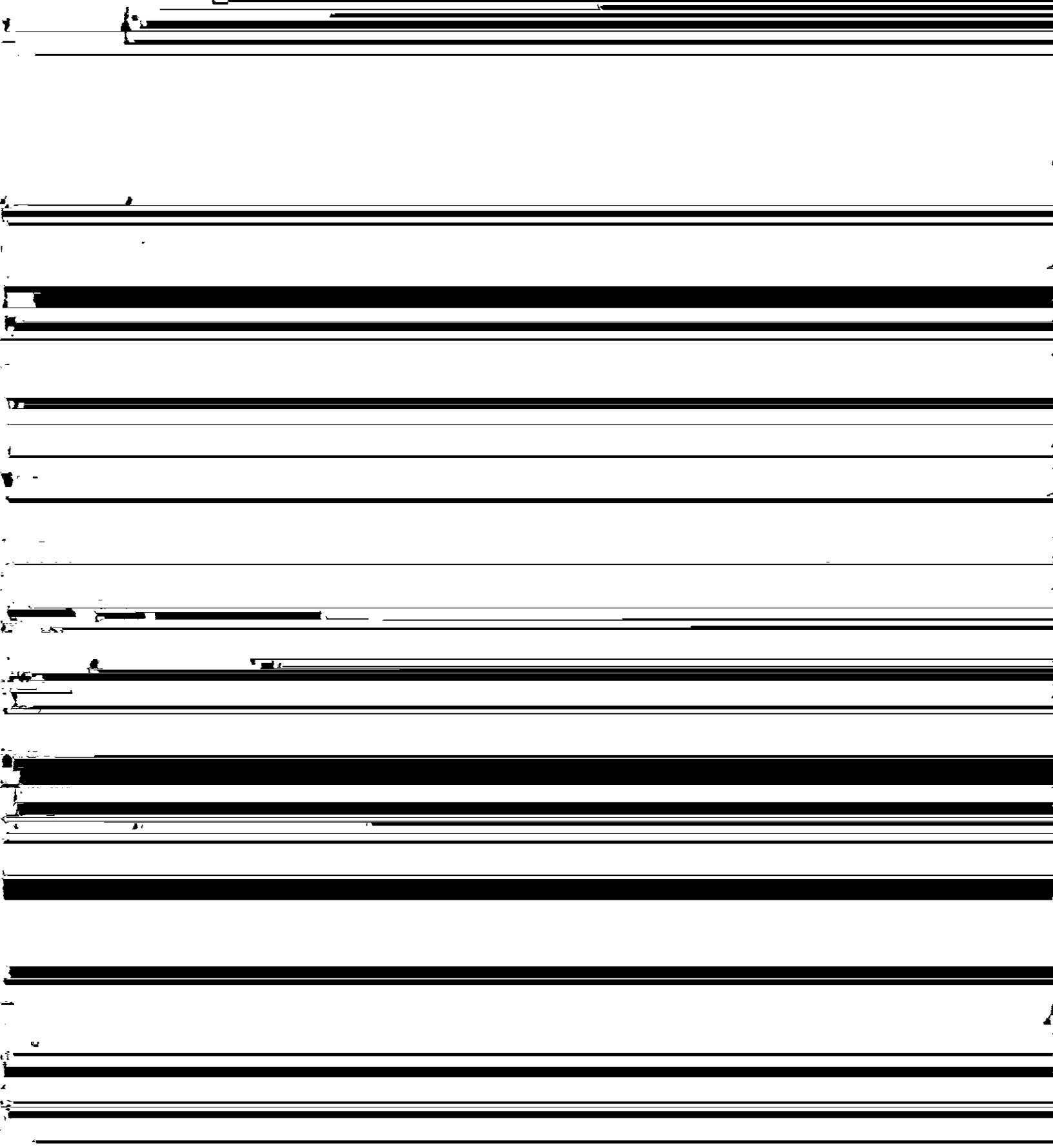
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- Outfall 007 – Placement of activated carbon filter bags to maximize sediment removal capability.
- Outfall 010 – Removed the existing filter media and replaced with vermiculite bags. Removed and replaced the cocomattings.

Based on the 2nd Quarter 2005 sampling and analytical results, the RMPs implemented in the

The purpose of Study 1 is to evaluate potential differences between grab samples and composite samples, and consists of the collection of surface water samples of "Q-1" and "Q-2" at the following locations:



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CERTIFICATION

I certify under penalty of law that this document and all appendices were prepared under my direction or supervision in accordance with a system designed to assure that

qualified personnel properly gather and evaluate the information submitted.

Based on my inquiry of the person or persons who manage the system, or those persons