

March 12, 2014

The Honorable Jay Inslee  
Governor, State of Washington  
PO Box 40002  
Olympia, WA 98504-0002

Dear Governor Inslee:

As you know, The Boeing Company shares the state's commitment to protect the environment. We have made significant investments to continually improve our environmental performance, including reducing hazardous waste and greenhouse gas emissions and increasing our recycling. We've done this during a time of tremendous business growth. With this in mind, I am writing to share serious concerns about the state's ongoing Water Quality Standards rulemaking.

A critical component of our success has been the ability to make predictable and targeted investments intended to result in real and achievable improvements for both environmental protection and future business success. We are concerned that the proposals currently under consideration achieve neither of these goals and will have unintended consequences for continued Boeing production in the state as well as for countless other Washington businesses and municipalities.

Water quality standards based on a fish consumption rate of 175 grams/day - even at a 10-5 risk level - would impose compliance requirements that are not technologically achievable based on known, available stormwater treatment technology despite the investment of hundreds of millions of dollars. Our experts have determined that intensive stormwater treatment systems would be required at our Washington facilities. While they would occupy significant acreage at each site, they would not be able to meet such stringent standards. Beyond our current operations, industry experts agree that expansion of existing facilities and construction of new facilities will be extremely limited, if not prohibited.

In order to avoid unnecessary impacts to Boeing's ability - and that of other businesses - to thrive and create jobs in the state, we request that the rulemaking:

- Identify and develop well-defined, effective and consistently applied compliance "tools",
- Memorialize the use of these tools in EPA-approved legislation, regulation or guidance as appropriate prior to the issuance of the water quality standards rule, and
- Include tools that adequately address new and expanding operations



We believe these tools should include, at a minimum:



- Variances of sufficient duration to allow for the development and assessment of cost-effective stormwater treatment systems. An efficient, well-defined and EPA-approved process for obtaining variances is critical for the regulated community to have confidence in its long-term ability to meet regulatory obligations,
- Utilize best management practices and treatment requirements based on design storm levels when implementing water quality standards in permits, and
- Implementation and use of all mechanisms available in the impaired and threatened waters listing (303(d)) process so as to minimize the risk of unnecessarily identifying water bodies as impaired and requiring TMDL development.

Thank you for your consideration. We remain committed to work with the state to protect the environment and ensure that Washington's economy continues to thrive.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Kim Smith'.

Kim Smith, Vice President  
Environment, Health and Safety

cc: Maia Bellon  
Ted Sturdevant