SPECIAL HEARING
2/3/05
cc: BD, DI, DWQ
E-cys: BD, CC HMS, TH, CMW

Bob Vogt
Pacific Lumber
P.O. Box 37, 125 Main St
Scotia, CA 95565-0037

January 28, 2005

Dear Mr. Vogt,

As per our recent conversation regarding required NPDES limits for non filterable residue (NFR) I am writing this letter to provide you with additional information regarding analysis for NFR.

The analytical method that we use is EPA 160.2. The sample is homogenized and filtered through a glass fiber filter. The filter is dried to a constant weight at 103-105°C. In order to avoid elevated results the analytical method stipulates "Non-representative particulates such as leaves, sticks, fish, and lumps of fecal matter should be excluded from the sample if it is determined that their inclusion is not desired in the final result." Therefore, these items are excluded from the sample aliquot. North Coast Laboratories' reporting limit for NFR is 1.0 mg/L.

I have reviewed a few NFR results from other clients for storm water. Most of the results for these samples were greater than 100 mg/L. In addition, we collected a runoff sample during the rain on January 26, 2005 from a paved parking lot with 12 parking spaces. The result for this sample was 28 mg/L.

Additional storm water information can be found at the Community Clean Water Institute website - http://www.ccwi.org. This organization conducted several storm water sampling events called First Flush. Non Filterable Residue was one of the parameters that they monitored. These results for the First Flush samples can be found on their website. This may give you some indication as to the range of results that are seen during storm events.

Please let me know if you need any additional information regarding this analysis.

Sincerely,

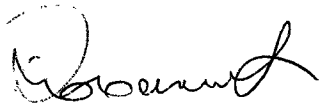
Roxanne Golich-Moore
Laboratory Manager

NORTH COAST LABORATORIES LTD.

October 18, 2004

Preparation of 100 mg/L NFR sample:

Non Filterable Residue (NFR) samples were prepared at North Coast Laboratories. Two samples were prepared by weighing 100 mg of sample each sample using a Mettler Toledo top loading balance. The balance calibration was verified prior to use using 0.010 g, 0.10 g, and 1.0 g weights and then tarred with 10 and 100 g weights and then once again weights at 0.010 g and 0.10 g weights are verified. Two different samples were prepared. One sample was prepared using a sandy sample and a second one was prepared using estuary sediment from National Bureau of Standards. The samples were transferred to a clear container and 1 L of water was added to the sample.



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