

May 4, 2007



FREER CONSULTING CO

LII, Inc.
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DEPARTMENT OF ECOLOGY

MAY 11 2007

WATER QUALITY PROGRAM

Re: Permit # SO3-000072D

Note: Level One Response initiated

Dear Jeff,

Freer Consulting Co. has reviewed the **Q1 2007** sampling results for the **LII, Inc. - Lynden Industrial Stormwater General Permit**. Discharges in **turbidity** were above the "benchmark values" set by Washington Department of Ecology. Parameters that were above benchmark values are highlighted in blue in the table below. Parameters where "action levels" were exceeded are highlighted in red.

Quarterly Monitoring	Benchmark Value	Action Level	Sample Results				UNITS	Sample Type	Recommendations
			Q2 06	Q3 06	Q4 06	Q1 07			
Turbidity	25	50	NA	NA	21	46	NTU	Grab	Initiate Level One Response
pH	6 - 9	5 - 10	NA	NA	5.7	7.1	Standard Units	Grab	
Zinc (total)	117	372	NA	NA	<25	63	µg/L	Grab	
Oil & Grease	15	30	NA	NA	<5	9.5	mg/L	Grab	
TSS	45	90	NA	NA	NA	N/A	mg/L	Grab	
Copper	63.6	149	NA	NA	<5	6	µg/L	Grab	
Lead	81.6	159	NA	NA	1	3	µg/L	Grab	

A **Level One Response** is initiated each time after December 31, 2004 that quarterly sample results are above the benchmark values or outside of the parameters.

Ecology required steps:

- 1) Conduct an inspection of the facility for potential pollutant sources including:
 - a. Evaluate possible sources of pollutant in the stormwater discharge,
 - b. Identify source/operational control methods by which permittee can further reduce stormwater pollution,
 - c. Evaluate whether any improvements or changes to the SWPPP are warranted to control the benchmark parameter.
- 2) Summarize the results, including remedial actions taken, in a report and put in SWPPP
- 3) Evaluate need for a Level Two or Three Response,
- 4) Include a brief summary of inspection results and remedial actions with the quarterly DMR.

LII action steps taken:

- 1) An inspection of the site was conducted when the stormwater sample was taken. A site inspection was conducted by Freer Consulting Co. on May 4, 2007. The primary observation included the fact that the sample is taken before the stormwater passes through an oil water separator so the results of the stormwater pollution in the water taken from the sampling point may not accurately reflect the quality of

water leaving the property. Further analysis revealed that it would be very difficult for a sampling point to be added after the oil water separator due to the close proximity to the road.

- 2) The inspection(s) also noted:
 - a. Potential sources of high turbidity include light amounts of dirt and on lot from normal operations,
 - b. Further source/operational controls by which permittee could further reduce pollution were not noted at the time. Turbidity will continue to be monitored on a quarterly basis and if results continue to exceed the benchmark values then the permittee may consider vacuum sweeping the lot on a regular basis as an operational control.
 - c. SWPPP was reviewed/updated on May 4, 2007,
- 3) Remedial actions taken include continuing to monitor turbidity levels and updating the SWPPP per 2c. A copy of this letter, which serves as a summary report, will be kept with the SWPPP,
- 4) Level Two/Three Response is not needed, and
- 5) A copy of this letter, which serves as a summary report, was sent with the Q1 2007 DMR to Ecology

Enclosed is a copy of the DMR for this quarter for the SWPPP file. Please respond within two weeks to acknowledge receipt of these documents and further discuss recommended stormwater controls toward reducing the levels of pollution, where applicable.

Freer Consulting Co. is available as a resource for further site investigation, training and stormwater control strategies toward pollution reduction. Note: recommendations from Freer Consulting Co. does not guarantee reduction of pollutants.

Thank you,

Freer Consulting Co.
Carrie Salters
Project Manager