

January 12, 2007

LTI, Inc.
Attn: Jeff Kok
8631 Depot Rd
Lynden, WA 98264

Re: Permit # SO3-000072D

DEPARTMENT OF ECOLOGY
JAN 17 2007
WATER QUALITY PROGRAM



FREER CONSULTING CO

3213 West Wheeler Street, Suite 219
Seattle, WA 98199-3245
206 285 9041
www.freerconsulting.com
info@freerconsulting.com

Dear Jeff,

Freer Consulting Co. has reviewed Q4 2006 sampling results for the LTI, Inc. - Bellingham Industrial Stormwater General Permit. The Q4 discharges in pH are above the "benchmark values" set by Washington Department of Ecology. These are highlighted in red in the table below.

Quarterly Monitoring	Benchmark Value	Action Level	Sample Results				UNITS	Sample Type	Recommendations
			Q1	Q2	Q3	Q4			
Turbidity	25	50	NA	NA	NA	21	NTU	Grab	
pH	6 - 9	5 - 10	NA	NA	NA	5.7	Standard Units	Grab	Conduct further site investigation for possible cause of low pH.
Zinc (total)	117	372	NA	NA	NA	<25	µg/L	Grab	
Oil & Grease	15	30	NA	NA	NA	<5	mg/L	Grab	
TSS	45	90	NA	NA	NA	NA	mg/L	Grab	
Copper	63.6	149	NA	NA	NA	<5	µg/L	Grab	
Lead	81.6	159	NA	NA	NA	1	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.

LTI action steps taken:

- 1) An inspection of the site was conducted when the stormwater sample was taken.
- 2) The inspection noted:
 - a. None noted at time of inspection,
 - b. See column titled "Recommendations" in above table,
 - c. SWPPP will be reviewed/updated in Q1 2007,

- 3) Remedial actions taken include continuing to monitor pH 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 Q4 2006 DMR to Ecology

Enclosed is a copy of the DMR for this quarter for the file, the original copy has been sent to Ecology. Please respond within two weeks to acknowledge receipt of these documents and discuss recommended stormwater controls and BMPs toward attaining the benchmark values, where applicable.

Freer Consulting Co is available as a resource for site investigation and training, stormwater controls and BMP implementation strategies toward pollution reduction, and report submittal to Ecology.

Thank you,



Freer Consulting Co

| Carrie Salters

Project Manager

January 12, 2007

Lee & Eastes
Attn: Wayne Botts
2418 Airport Way S
Seattle, WA 98134



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DEPARTMENT OF ECOLOGY

JAN 17 2007

WATER QUALITY PROGRAM

Re: Permit # SO3-004614

Dear Wayne,

Freer Consulting Co. has reevaluated the **Q3 2006** sampling results for Lee & Eastes' Industrial Stormwater General Permit. The sampling results did not exceed "action levels" indicated in the ISGP which would require a Level Two Response to the Department of Ecology. Lee & Eastes is still at a Level One Response

Freer Consulting Co. has reviewed **Q4 2006** sampling results for Lee & Eastes' Industrial Stormwater General Permit. None of the parameters tested were above the "benchmark values" set by Washington State 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	BMP Recommendation
			Q1	Q2	Q3	Q4			
Turbidity	25	50	4.7	NA	2.6	10	NTU	Grab	
pH	6-9	5-10	7.3	NA	7.4	7.2	Standard Units	Grab	
Zinc (total)	117	372	74	NA	59.5	158	µg/L	Grab	Initiate Level One Response (see below). Sweep yard regularly.
Oil & Grease	15	30	5	NA	5	9	mg/L	Grab	
Total Suspended Solids	30	90	48	NA	24	80	mg/L	Grab	Initiate Level One Response (see below). Sweep yard regularly.

A **Level One Response** is initiated each time the quarterly samples collected after December 31, 2004 are above the benchmark values or outside the benchmark range for pH

Ecology required action steps:

1. Conduct an inspection of their facility as promptly as possible but no later than two weeks after receipt of the sampling results.
2. The inspection shall:
 - a. Evaluate possible sources of the benchmark parameter in the stormwater discharge,
 - b. Identify source/operational control methods by which the permittee can further reduce stormwater contamination,
 - c. Evaluate whether any improvements or changes to the SWPPP are warranted to control the benchmark parameter.
3. Summarize the results, including remedial actions taken, if any, and place them in the SWPPP,
4. Evaluate the need for a Level Two or Three Response, and
5. Include a brief summary of inspection results and remedial actions with the quarterly DMR for the quarter for which sample results were above benchmark values.

Lee & Eastes action steps taken:

1. An inspection of the site was conducted when the stormwater sample was taken.
2. The inspection noted:
 - a. Possible sources of ISS may include wear from tires, dust and debris accumulated on site due to normal operations; zinc will continue to be monitored,

- b. See column titled "Recommendations" in above table,
- c. SWPPP will be reviewed and updated in Q1 2007,
- 3 Remedial actions taken include an evaluation of the cost and effectiveness of sweeping the yard on a regular basis 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 per the ISGP, and
- 5. A copy of this letter, which serves as a summary report, was sent with the Q4 2006 DMR to Ecology.

Enclosed is a copy of the DMR for this quarter for the file, the original copy has been sent to Ecology. Please respond within two weeks to acknowledge receipt of these documents and discuss recommended stormwater controls and BMPs toward attaining the benchmark values, where applicable.

Freer Consulting Co. is available as a resource for further site investigation, training and stormwater controls and BMP implementation strategies toward pollution reduction. Note: recommendations from Freer Consulting Co. do not assure reduction of pollutants in the sample results where exceeded.

Thank you,



Freer Consulting Co
Carrie Salters
Project Manager

JAN 17 2007

SO3-004614

**INDUSTRIAL STORMWATER GENERAL PERMIT
DISCHARGE MONITORING REPORT**

MONITORING PERIOD for (year/quarter): year 2006 Jan/Feb/Mar Apr/May/Jun Jul/Aug/Sep Oct/Nov/Dec

Facility/Site Information
LEE & EASTES
Location: 2418 AIRPORT WAY S
County: KING

Mailing Information
LEE & EASTES
2418 AIRPORT WAY S
SEATTLE WA 98134

Primary SIC Code: 4213

You must send a Discharge Monitoring Report (DMR) to Ecology every quarter. If there was no discharge or you have suspended sampling because of consistent attainment of benchmark values, mark the appropriate boxes and send the DMR to Ecology. Please read the instructions before completing the DMR. You must SIGN this form before sending it to Ecology.

Discharge Point <u>Main Catch Basin</u>						
There was no qualifying storm event this quarter so no values are entered below (see explanation)						
Quarterly Monitoring		AVERAGE	MAXIMUM	UNITS	Sample Type	Events Sampled
Turbidity	Consistent Attainment		10	NTU	Grab	1
pH	Consistent Attainment		7.2	Standard Units	Grab	1
Zinc (total)	Consistent Attainment		158	µg/L	Grab	1
Oil & Grease	Consistent Attainment		9	mg/L	Grab	1
TSS	Consistent Attainment		80	mg/L	Grab	1

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 USC § 1001 AND 33 USC § 1319. (PENALTIES UNDER THESE STATUTES MAY INCLUDE FINES UP TO \$10,000.00 AND OR MAXIMUM IMPRISONMENT OF BETWEEN SIX MONTHS AND FIVE YEARS.)

<u>Carrie Salters</u> NAME/TITLE AUTHORIZED AGENT	<u>Dec 28, 2006</u> DATE: MO DAY YR
 SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	<u>206-953-4103</u> TELEPHONE NUMBER
COMMENTS	

DEPARTMENT OF ECOLOGY
 JAN 17 2007
 WATER QUALITY PROGRAM

SO3-000072D

**INDUSTRIAL STORMWATER GENERAL PERMIT
DISCHARGE MONITORING REPORT**

MONITORING PERIOD for (year/quarter): year 2006 Jan/Feb/Mar Apr/May/Jun Jul/Aug/Sep Oct/Nov/Dec

Facility/Site Information

LTI, INC
 Location: 8631 DEPOI RD
 County: WHATCOM

Mailing Information

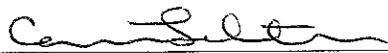
LTI, INC.
 8631 DEPOI RD
 LYNDEN, WA 98264

Primary SIC Code: 4213

You must send a Discharge Monitoring Report (DMR) to Ecology **every quarter**. If there was **no discharge** or you have **suspended sampling** because of consistent attainment of benchmark values, mark the appropriate boxes and send the DMR to Ecology. Please read the instructions before completing the DMR. **You must SIGN** this form before sending it to Ecology.

Discharge Point <u>Truck Lot</u>						
There was no qualifying storm event this quarter so no values are entered below (see explanation)						
Quarterly Monitoring		AVERAGE	MAXIMUM	UNITS	Sample Type	Events Sampled
Turbidity	Consistent Attainment		21	NIU	Grab	1
pH	Consistent Attainment		5.7	Standard Units	Grab	1
Zinc (total)	Consistent Attainment		<25	µg/l	Grab	1
Oil & Grease	Consistent Attainment		<5	mg/l	Grab	1
ISS	Consistent Attainment		N/A	mg/l	Grab	1
Copper	Consistent Attainment		<5	µg/l	Grab	1
Lead	Consistent Attainment		1	µg/l	Grab	1

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 USC § 1001 AND 33 USC § 1319. (PENALTIES UNDER THESE STATUTES MAY INCLUDE FINES UP TO \$10,000.00 AND OR MAXIMUM IMPRISONMENT OF BETWEEN SIX MONTHS AND FIVE YEARS.)

<u>Carrie Salters</u>	<u>Dec 28, 2006</u>
NAME/TITLE AUTHORIZED AGENT	DATE: MO DAY YR
	<u>206-953-4103</u>
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE NUMBER

COMMENTS
 Total Suspended Solids was accidentally not written on the chain of custody when sent to the lab so it was not tested.