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Nicholas M. Acklam,  
 Section Manager – ERO  
 Toxics Cleanup Program  
 Washington State Department of Ecology

Dear Nick,

The (County) is perplexed by Ecology’s expectation that (we) should sign the second proposed final AO Amendment without resolution of the PS&E development schedule concerns. Despite the progress made on other aspects of the proposed final amendment, Ecology’s proposed schedule for PS&E development (60 days for 30% deliverable, 30 days each for 60% and 90%) is not feasible.

This situation is vexing since (we) have made several other schedule concessions, including:

- Starting planning of the P1 MPE restart and the expanded MPE interim actions ahead of the final AO amendment (early start).
- Acceptance of the 30-day P1 MPE work plan schedule after the amendment effective date, which is feasible with the early start.
- Acceptance of the 120-day Interim Action Work Plan (IAWP) development schedule, which is also feasible with the early start.
- Acceptance of 90 days to deliver the interim action progress and completion reports, granting development of those reports can start before the end of the respective reporting periods.
- Acceptance of EIM data submittal 30 days after the submittal of each semi-annual groundwater monitoring report, given the clarification that EIM submittal is only required following the semi-annual reports.

In addition to achieving agreement in the areas mentioned above, (we) will also accept the 6-month construction schedule given Ecology’s reassurances that uncertainties outside (our) control will be given consideration should the construction take longer.

The concurrence above resulted from a productive dialog with Ecology last December and earlier conversations. We trust continuation of that approach will lead to a mutually acceptable amendment.

”To meet current and future needs, serving together with public and private entities, while fostering a respectful and successful work environment.”

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Last December, Parametrix described why more time was requested for PS&E development. The MPE expansion plan set will include about 60 sheets including electrical, controls, process mechanical, and civil, along with 40 specification sections. Expanding the system requires mechanical, electrical, and controls tie-in to existing infrastructure, which is more exacting than designing all new work. The PS&E for the existing system was performance-based, including 51 technical specification sections and 23 plan sheets. After bidding, 26 electrical and control sheets were added by the liquid and vapor treatment train fabricator to detail the work specified by performance criteria. Parametrix will need to change most of the record drawings and add new sheets to cover the new work and tie-ins. Parametrix will also need to modify most of the specifications and may need to add sections. The engineering discipline leads for Parametrix have all signed off on the requested 120-day schedule to develop the 30% PS&E. Each of the engineering leads also opined that the schedule seemed aggressive. The 120 calendar days is only about 88 working days, and PLP reviews further reduce the time available for design development. The 30% PS&E development will need to be based on the design criteria in the approved IAWP. Although the early start has potentially shifted the planning and design schedule ahead, it does not reduce the time needed to develop the 30% PS&E. Parametrix originally requested 120 days for 60% and 90% PS&E submittals, respectively, and later agreed that 90 days from 30% to 60% should be manageable, followed by 60 days to get to 90%. This was based on the notion that a design team would have some momentum going to 60% and 90%, and tacitly assume reasonable concurrence by Ecology on the developing documents.

In summary, (we) propose an aggressive schedule of 120, 90, and 60 days, respectively, to develop 30%, 60%, and 90% PS&E submittals. We trust Ecology will reconsider the PS&E development schedule. It is not feasible to develop the PS&E for this project on the 60, 30, and 30-day schedule proposed by Ecology.

Respectfully,

Sam Castro, CPO  
 Director of Public Works

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