



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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July 27, 2011

Leslie Bryson  
City of Bellingham - Parks and Recreation Department  
3424 Meridian Street  
Bellingham, WA 98225

Re: Schedule Extension - South State Street Manufactured Gas Plant (SSSMGP)

Ms. Bryson:

Ecology has received and reviewed your July 13, 2011 letter (on behalf of the City and PSE) requesting a project schedule extension for SSSMGP site work.

We are aware of the need for more sampling at the site. Ecology staff reviewed and provided comments on the June 30, 2011 SSSMGP RI Interim Data Report. In our July 15<sup>th</sup> comments, we agreed with the City and PSE that additional sample collection was called for in order to fully understand the nature and extent of contamination at the site.

Per Agreed Order No. 7655 (April 2010), an Extension of Schedule has certain requirements:

- the request is submitted in a timely fashion, generally at least thirty (30) days prior to expiration of the deadline
- good cause exists for granting the extension

The City and PSE have met the submission deadline and Ecology agrees that more time is needed to collect and analyze additional data.

The AO specifies that an extension shall only be granted for a period of time that Ecology determines is reasonable under the circumstances. An extension can only exceed 90 days as a result of permitting delays, endangerment or "circumstances deemed exceptional or extraordinary" by Ecology.



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The July 13<sup>th</sup> request is for an extension of 120 days after receipt of data from the July/August data-gap sampling event. As the City and PSE would expect to get the data in November 2011, that would push delivery back to March 2012. While -- in light of the need for additional sampling, Ecology agrees with the proposal to extend the Project Schedule -- this request does not seem to meet the requirements for the extension to exceed 90 days.

For that reason, **Ecology will grant a 90-day extension to the schedule, starting with receipt of data from the July/August data-gap sampling event.** (Please note: Since the original delivery date for the RI Work and Data was August 2011, this would amount to an extension of approximately 180 days/6 months beyond the original deadline.)

If the data from this sampling event is received by the City and PSE in November, this would move the delivery date to approximately February 9, 2012. The estimated delivery date of the draft FS report would then be May 29, 2012 and the final RI/FS report would be scheduled for completion by mid-September, 2012.

In the event that additional time is needed to complete these tasks, the City and PSE should contact Ecology at least thirty (30) days prior to expiration of the new deadline to request a second extension.

If you have any questions about these modifications to the schedule, please contact me at (360)715-5224 or at [mohe461@ecy.wa.gov](mailto:mohe461@ecy.wa.gov).

Sincerely,



Mary O'Herron  
Site Manager  
Environmental Specialist

cc: Greg Adrina, PSE  
Chip Halbert, Landau  
Mark Herrenkohl, Herrenkohl Consulting  
John Guenther, AECOM