Oregon
Tina Kotek, Governor

Department of Environmental Quality
Eastern Region - Bend
475 NE Bellevue Drive, Suite 110
Bend, OR 97701
541-388-6146
TTY 711

Dear Sarah Esterson,

Thank you for your request for information regarding the Department of Environmental Quality's regulatory oversight of the Boardman Coal Plant in connection with the Oregon Department of Energy's evaluation of Portland General Electric's request to terminate the facility's Site Certificate.

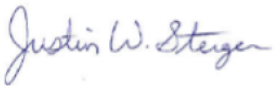
Based on DEQ's current records and oversight of the facility, we offer the following information regarding the Water Pollution Control Facilities (WPCF) permit and groundwater monitoring activities:

- DEQ has received PGE's timely application to renew the wastewater permit (designated as a WPCF permit) assigned to the Boardman Coal Plant and Carty Generating Station. The renewal application is currently under review, and in accordance with OAR 340-045, the existing permit remains in effect until DEQ completes its review and issues a final permitting decision.
- DEQ considers the groundwater monitoring conducted for the coal combustion residuals (CCR) units since 2019 to have been performed in accordance with the applicable monitoring requirements. Based on the information submitted to date, DEQ considers the groundwater monitoring program to be adequate.
- Based on DEQ's oversight and the information currently available, DEQ considers the groundwater monitoring and related actions undertaken at the Boardman Coal Plant site to be adequate. DEQ has no information indicating that the site currently presents an unsafe or hazardous condition with respect to the matters regulated under the WPCF permit and DEQ's groundwater oversight.
- As a condition of the WPCF permit renewal, DEQ expects to require PGE to update the groundwater monitoring plan which covers the CCR landfill, the Boardman Coal Plant footprint, and Carty Generating Station, to evaluate data collected under the plan, and to propose concentration limits in accordance with Oregon Administrative Rule 340-040. For the CCR landfill, the proposed limits and ongoing groundwater monitoring is to be in alignment with the 40 CFR Part 257 requirements for post-closure monitoring.

DEQ will continue to exercise its regulatory authority over the facility, including completion of the WPCF permit renewal process and ongoing oversight of applicable groundwater monitoring and compliance requirements, as appropriate. With the termination of the BCP site certificate, DEQ has also discussed with ODOE that DEQ will continue to require groundwater monitoring oversight of areas not under the existing Carty Generating Station site certificate. As such, the site boundary in the CGS site certificate may need to be amended to include those areas under the WPCF program for alignment of land use approval as well as for the water quality limits for Carty Reservoir included under the BCP Site Certificate.

We hope this information is helpful as the Department evaluates the Site Certificate termination request. Please contact us if you have any questions or require additional information.

Sincerely,



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Ecc: Mike Hiatt, DEQ Water Quality Manager