Portland General Electric
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November 12, 2024
Boardman Plant

Todd Cornett
Division Administrator
Energy Facility Siting
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301

Subject: Boardman Site Certificate Termination Request

Dear Mr. Cornett,

This letter is to request termination of Portland General Electric Company's (PGE) site certificate entered into March 24, 1975, for the Boardman Coal Plant (BCP). PGE ceased operating the BCP on October 15, 2020 (the last day coal was burned and electricity was produced). After ceasing operations PGE decommissioned and demolished the BCP and completed that work on December 22, 2023, with minor demobilization of some equipment completed in the first week of January 2024.

Brandenburg Industrial Services (BISCO) was selected by PGE as the demolition contractor following a Request for Qualification process from which five demolition contractors were selected to bid. The project demolition team included PGE, AECOM, and Resolute. AECOM assisted with project planning and provided environmental assessments, project design, and demolition oversight services, Resolute provided project demolition subject matter expert services.

PGE requests the site certificate be terminated because PGE is no longer operating the BCP, all site certificate requirements and conditions have been complied with. Note that current site certificate termination and facility retirement rules were not in place at the time of the site certificate execution; therefore, current rules are not applicable to the retirement of the BCP and the termination of the site certificate.

Site Description

BCP was a coal-fired power plant at 73334 Tower Road in Boardman, Oregon (Morrow County). It was located adjacent to Carty Reservoir on Sixmile Canyon, approximately 13 miles south-southwest of Boardman, Oregon. The plant was constructed in the late 1970s and began commercial operation in August 1980. The ancillary facilities in addition to the main power block were offices, shops, warehouses, evaporative lagoons, settling ponds, a water supply well, coal storage and handling area, ash handling facilities and disposal area, Carty Reservoir, a 15 mile rail spur and loop originating from the Union Pacific Railroad, extension of Tower Road, and two transmission lines approximately 17 miles each.

Warranties

PGE made three warranties as part of obtaining the Site Certificate: Financial Ability, Ability to Operate, and Protection of Public Health and Safety (Section III). The following is a description of how PGE has met each of these warranties.

- *Financial Ability:* PGE demonstrated during the 40 years it operated BCP that sufficient funds were available to cover the costs of operating the plant and processing and disposing of the coal combustion residuals (CCR). PGE has completed demolition of the plant using funds from a dedicated Asset Retirement Obligations account. This account will continue to fund PGE's retirement obligations for BCP, which include long-term monitoring required by state and federal environmental regulations.

- *Ability to Operate:* PGE operated BCP consistent with the public health, safety, and welfare conditions of the site certificate as evidenced in the annual reports submitted to the Oregon Department of Energy (the Department). With BCP no longer operating and demolition complete, this warranty is no longer applicable. Related or supporting BCP facilities that also support the Carty Generating Station (CGS) have been transferred to the CGS Site Certificate.

- *Protection of Public Health and Safety:* During operation of the BCP, PGE complied with applicable federal statutes, rules, and regulations and operated the plant without posing a danger to public health and safety as is evidenced in the annual reports submitted to the Department. With BCP no longer operating and demolition complete, this warranty is no longer applicable.

Status of Facility Components

The below table lists the facility components identified in Section II of the Site Certificate and their disposition after decommissioning and demolition of BCP.

Facility	Status	Notes
Power Plant	Demolished	Demolition was completed at the end of 2023. Note that the Boardman site certificate did not list all features considered under the category "Power Plant"; anything remaining after demolition has either been transferred to the CGS site certificate through Amendment 2 or has been left in place for other PGE uses not specific to the CGS. [1]
Carty Reservoir	Remaining and transferred to Carty Site Certificate	Included in Amendment 2 to the CGS Site Certificate.
Pumping plant on Columbia River for reservoir filling	Never constructed	Throughout operations PGE relied on the pumps constructed, owned, and operated by Threemile Canyon Farms to fill Carty Reservoir.
Pipeline from Pumping Plant to reservoir	Never constructed	Throughout operations PGE relied on the pipeline constructed, owned, and operated by Threemile Canyon Farms. Threemile Canyon Farms has irrigation rights to Carty Reservoir; therefore, they have a pipeline to the reservoir.

1 Structures left in place not associated with Carty Generating Station include railroad spur line, fuel oil storage tank (empty), plant roads, fencing, 300,000 gallon water tank, and evaporation ponds. Note that the 300,000 gallon water tank and evaporation ponds were potentially going to be connected to the Carty Generating Station; however, those connections were never made.

Tower Road extension	Remaining and maintained	Used to continue access to the BCP site for potential redevelopment and CCR landfill for monitoring and used by CGS for access.
Transmission Lines	Remaining and transferred to the Carty Site Certificate	Transmission lines were included in Amendment 2 to the CGS Site Certificate.
Railroad spur line (from UPRR tracks to Plant), 15 miles	Rail loop remains but crossing has been decommissioned	The rail loop is unused but could potentially be re-opened at a future date with inspections and reactivation of the crossing.
Barge basin	Never constructed	
Dewater Flowage Easement	Remaining	The Dewater Flowage Easement was conveyed in the original Bargain and Sale Deed for the property and certain easements; therefore, PGE continues to hold the easement because PGE continues to own the property.

Permit Status

The table below lists the status of the operating permits for BCP.

Permit	Agency	Status	Details
Water Pollution Control Facility Permit (File #70795) - a joint permit that covers BCP and CGS	DEQ	Modified	The WPCF permit is a joint permit that covers the BCP and CGS. A permit renewal application was submitted to the Oregon Department of Environmental Quality (DEQ) on February 28, 2023. In the renewal request, PGE proposed changes to the permit to remove conditions related to the BCP that are no longer applicable. Conditions related to groundwater monitoring will remain in place until DEQ deems it appropriate to cease monitoring. At the time of this termination request the renewal request has not been processed and the current permit is administratively extended until DEQ issues the new permit.
Title V Air Quality Permit (# 25-0016-TV-01)	DEQ	Modified	The Title V permit was a shared permit for BCP and CGS. PGE requested BCP be removed from the permit in the August 2020 renewal application. The permit renewal was issued September 26, 2024.
Radioactive Materials License (# ORE-90735)	OHA	Terminated	Terminated per email correspondence dated December 1, 2020.

Permit	Agency	Status	Details
			Documentation of termination received from the Oregon Health Authority on June 24, 2021.
Underground Storage Tanks (UST) (25-833)	DEQ	Terminated	BCP's two fiberglass USTs were decommissioned by removal in accordance with ODEQ regulations in October 2020.

Coal Combustion Residuals Landfill

Site Certificate, Condition IV.C.3(b) states:

> *"Prior to unrestricted use of the site, the ash pile shall be stabilized in accordance with applicable rules and regulations of the Oregon Department of Environmental Quality and the external gamma dose and radon emanation rate from the stabilized pile shall be measured and reported to the Oregon Department of Energy."*

The required measurements were taken, and a report was prepared and submitted to the Department titled "Boardman Power Plant Radiation Site Survey Results, Revision Version 001, March 7, 2022." The report summarizes historical assessments, establishes baseline background levels, summarizes the site survey plan, and presents results. The conclusion states that PGE has met the requirement to provide external gamma dose and radon emanation rates from the stabilized pile and that those rates are below regulatory thresholds of concern.

The CCR landfill was closed on August 21, 2021. Closure was completed by leaving the CCR in place in accordance with the provisions of 40 Code of Federal Regulations (CFR) § 257.102(b)(1)(iii) and installing an Alternative Final Cover system in accordance with the provisions of 40 CFR § 257.102(d)(3)(ii). The cover is a Closure Turf© system consisting of a 60-mil high-density polyethylene textured geomembrane and an engineered synthetic turf material with sand infill.

The main access road to the CCR landfill cuts through the BCP property and entry to the property is restricted by the existing access gate. The road around the perimeter of the CCR landfill is also gated.

The United States Environmental Protection Agency (EPA) and Oregon Department of Environmental Quality (DEQ) continue to have jurisdiction over the landfill. PGE will conduct long-term groundwater monitoring, post-closure care, and recordkeeping and notifications in accordance with the provisions of 40 CFR § 257. Additionally, the DEQ requires groundwater monitoring across the BCP site, including the CCR landfill, and that monitoring will continue until DEQ deems it no longer necessary.

The federal CCR regulations require PGE to maintain and post certain documents related to the CCR landfill to a publicly accessible website. PGE's publicly accessible CCR Rule Compliance Data and Information website is at https://portlandgeneral.com/ccr-rule-compliance-data-information.

Future Use

Land formerly used for the BCP is zoned for industrial use and Exclusive Farm Use (EFU). Generally, the area north of Carty Reservoir is zoned for industrial use and the area south of the reservoir (CCR landfill and surrounding property owned by PGE) is zoned EFU. Features remaining on the site to support the operations of CGS were transferred to Carty Site Certificate under Amendment 2. Structures left in place not associated with CGS include railroad spur line, fuel oil storage tank (empty), plant roads, fencing, 300,000 gallon water tank, and evaporation ponds. These features were left in place as they may be used for future development.

PGE does not have any firm plans for future use of the remainder of the site; however, PGE is currently evaluating several options for redevelopment including the potential to add solar generation and battery storage.

PGE has demonstrated that it will maintain the BCP site in a safe condition by continuing to keep the site secured, demolishing the major site facilities, transferring remaining facilities to the Carty Site Certificate, and funding long-term monitoring of and reporting on the closed CCR landfill. Long-term monitoring of the CCR landfill is regulated by the EPA and groundwater monitoring required under the WPCF permit is regulated by DEQ. Therefore, the site certificate is not necessary to ensure that continuing Federal and State requirements are met because those respective agencies have authority over the ongoing requirements.

Conclusion

In summary, PGE requests the BCP site certificate be terminated because PGE has complied with all site certificate requirements and any remaining facility features have been transferred to the CGS site certificate, left in place in a safe and secure manner for use by future development, or demolished and the resulting area returned to a safe usable condition. Any ongoing environmental monitoring is regulated by the EPA or DEQ; and operational permits have been modified, formally requested to be modified, or terminated.

Please contact me if you require any additional information to process this request at Chris.Bozzini@pgn.com (503-464-7853) or Lenna Cope at Lenna.Cope@pgn.com (503-464-2634).

Sincerely,



Christopher Bozzini, P.E.
Director Environmental Services
Portland General Electric

Cc: Sarah Esterson, ODOE Senior Policy Advisor
Lee Archer, PGE Director Eastern Thermal Plants
Lenna Cope, PGE Environmental Specialist