



Oregon

Tina Kotek, Governor

Department of Environmental Quality

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April 18, 2024

Jacob Neal
Portland General Electric Company
121 SW Salmon Street
Portland, OR 97204

via electronic delivery (email)

**Re: 2021 Station L Cap Monitoring Report
ECSI# 151**

Dear Jacob Neal:

The Oregon Department of Environmental Quality (DEQ) reviewed the *2021 Station L Cap Monitoring Report*¹ (Monitoring Report) for the former Station L Site dated September 3, 2021. AECOM prepared the Monitoring Report on behalf of Portland General Electric Company (PGE) in accordance with the requirements specified in the *Phase II Record of Decision*² (Phase II ROD) and the *Order on Consent*³ (Consent Order, DEQ No. ECSR-NWR-88-02).

The Phase II ROD requires cap monitoring to ensure its integrity and cap repair or maintenance, as needed. The Phase II ROD requires cap monitoring for a period of 30 years and after every major flood event. The Monitoring Report describes the 30-year cap monitoring event. DEQ accepts the Monitoring Report without modification. DEQ does not require ongoing routine cap monitoring; however, PGE should continue to monitor the cap following major flood events (i.e., the 100-year flood or greater). The 100-year flood corresponds to a Willamette River discharge of 375,000 cubic feet per second, or a river stage of 29.9 feet City of Portland datum (32.0 feet North American Vertical Datum of 1988)⁴.

In addition to flooding, other extreme events, such as significant local seismic events or vessel grounding, could impact long-term Station L cap integrity. To ensure long-term cap integrity is maintained, DEQ requests that PGE monitor the cap after a significant local seismic event or vessel grounding. These events are consistent with contingency monitoring events for other caps constructed within the Downtown Reach of the Lower Willamette River, including PGE's River Mile 13.5 and 13.1 caps and the former Portland Gas Manufacturing (PGM) site cap at River Mile 12.1. The *River Mile 13.5 and 13.1 Cap Inspection, Monitoring, and Maintenance Plan*⁵ defines a significant local seismic event as a magnitude 6 or greater earthquake. The *Long-Term Monitoring and Maintenance Plan*⁶ for the PGM site cap defines a significant local seismic event as a 72-year earthquake (50% chance of exceedance in 50 years), which corresponds with a measured peak ground acceleration of 0.044 g recorded at National Strong Motion

¹ AECOM. 2021. Station L Cap Monitoring Report – 2021. Prepared for Portland General Electric Company. September 3.

² DEQ. 1990. Phase II Record of Decision, Station L Site, Phase II. February 16.

³ DEQ. 1988. Order on Consent. DEQ No. ECSR-NWR-88-02. August 5.

⁴ Federal Emergency Management Agency. 2010. Flood Insurance Study, City of Portland, Oregon. Flood Insurance Study Number 410183V000B. November 26.

⁵ AECOM. 2018. River Mile 13.5 and 13.1 Cap Inspection, Monitoring, and Maintenance Plan, River Mile 13.5 and 13.1, Portland, Oregon. Prepared for Portland General Electric Company. June 22.

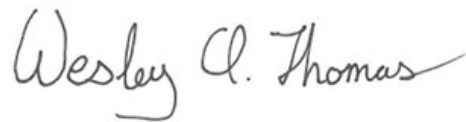
⁶ Anchor QEA, LLC. 2020. Long-Term Monitoring and Maintenance Plan, Former Portland Gas Manufacturing Site, ECSI No. 1138. Prepared for NW Natural. March 2.

Project [NSMP] Station 2172⁷. Because the methods for measuring or determining whether a magnitude 6 earthquake has occurred are not defined, DEQ requests that PGE adopt the significant local seismic definition established for the PGM cap. If desired, PGE may calculate a site-specific peak ground acceleration value representative of the 72-year earthquake (50% chance of exceedance in 50 years) with the U.S. Geological Survey (USGS) Unified Hazard Tool⁸ using the Dynamic Conterminous U.S. 2014 edition and site-specific subsurface data.

Finally, given the potential OMSI district redevelopment plans for the upland parcels along the riverfront, DEQ requests that PGE register the Station L cap with the Oregon Utility Notification Center (811 “One Call” center). If future sediment disturbance activities are planned near the Station L cap, we request PGE notify DEQ after receipt of notice of such activities.

We appreciate PGE’s efforts to monitor and maintain the Station L cap. Please do not hesitate to contact me at (971) 263-8822 or Wesley.Thomas@deq.oregon.gov if you have questions regarding this letter.

Sincerely,



Wesley A. Thomas, PE
Project Manager
NWR Cleanup Section

EC: Paul Seidel, DEQ
Heidi Nelson, DEQ
Keith Johnson, PGE
Maya Taylor, AECOM
ECSI No. 151 Files

⁷NSMP Station 2172 (<https://earthquake.usgs.gov/monitoring/nsmp/stations.php>) is located at Portland State University Cramer Hall (1721 SW Broadway, Portland, Oregon 97201)

⁸ <https://earthquake.usgs.gov/hazards/interactive/>