



Portland General Electric
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April 16, 2025

Killian Stoltenburg
Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97213

Dear Killian;

This letter serves as Portland General Electric's (PGE) submission of a Risk Mitigation Plan (Plan), as described in OAR 340-300-0004, for the oil tank storage farm at PGE's Beaver Generating Plant (Facility) in Clatskanie, Oregon.

Current Fuel Storage

The Facility was originally designed to run on either #2 diesel or natural gas. Diesel was stored in an adjacent tank farm (see Figure 1). The Facility now primarily uses natural gas for the production of electricity, with diesel serving as an alternative fuel. Currently, PGE has approximately 2 million gallons of diesel stored onsite, in Tanks 1, 4 and 8. The remaining storage tanks (tanks 2, 3, 5, 6 and 7) have been decommissioned. Under agreement with DEQ, PGE is prohibited from accepting additional diesel fuel for storage and use at the Facility. Use of diesel fuel for energy production is prohibited after March 31, 2026.

Mitigation Plan

PGE completed a geotechnical assessment of the Facility's tank farm in 2021 to evaluate risks due to potential seismic events. As summarized in the Seismic Vulnerability Assessment submitted to DEQ on May 30, 2024, the tank farm is located on soils highly susceptible to liquefaction (see page 6, item 4 of the Assessment).

The Facility is transitioning away from use of diesel fuel for generating electricity to now use natural gas. Under agreement with DEQ, PGE is currently upgrading the turbine fuel burners, which will convert them to natural gas only usage. This project will be completed in 2026 at which time no diesel fuel can be used to generate electricity.

Three of the storage tanks (Tanks 1, 4, and 8) are currently in service. The remaining five tanks are empty and decommissioned (their capacity is eliminated; tanks have been cleaned and connections cut). All piping is above ground and is believed to be empty. Additional oil handling equipment at the Facility includes a single truck loading rack (inactive, but usable), and a pipeline from the tank farm to the dock (pipeline is empty, cut and capped).



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PGE is finalizing plans to remove diesel in the remaining tanks through resale. Here is a summary of the anticipated process:

1. Removal of all remaining diesel fuel from the tank farm (Tanks 1, 4, 8) starting in 2026;
2. Decommissioning of the remaining tanks and piping (much of the piping has already been drained and cleaned). This work removes any remaining oil/solids and cleans the walls and floor of the tanks. After a post-cleaning inspection, piping will be air-gapped and door hatches removed on each tank.
3. Following decommissioning, all tanks and associated piping will be deconstructed and removed from the tank farm. Tanks will be cut down to the foundations and removed for scrap. The concrete tank foundations will remain for the time being. The schedule for deconstruction is to be determined.

Once Step 2 is complete, PGE will work with DEQ to ensure that these actions complete the Mitigation Plan and exit the tank farm from Seismic Program Rules.

PGE will provide DEQ with updates to our progress as appropriate (at least annually to fulfill annual reporting obligations).

Submitted by:

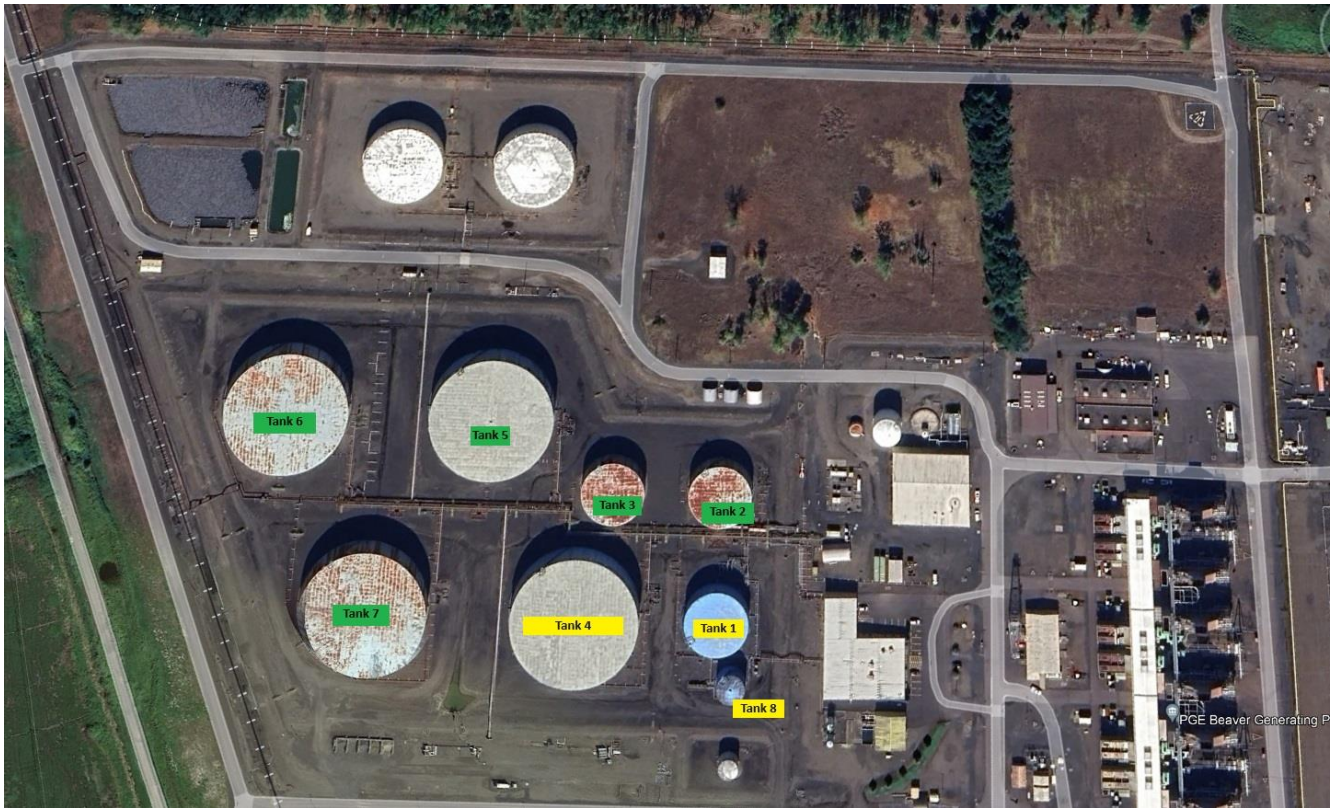
Name: T.J. Mulqueen

Signature: _____

Date: 4/16/25



Figure 1- Tank Farm Configuration



Tank ID	Capacity	Status
1		In Service
2		Out of service
3		Out of service
4		In Service
5		Out of service
6		Out of service
7		Out of service
8		In service