

**June 6, 2025**

Oregon Department of Environmental Quality

700 NE Multnomah St, Suite 600

Portland, OR 97232

Re: Risk Mitigation Implementation Plan – PDX Fuel Facility

**To Whom It May Concern:**

**2025 Annual Risk Mitigation Implementation Plan**

The purpose of this document is to provide an update to the Oregon Department of Environmental Quality in accordance with Or. Admin. R. section 340-300-0005.

The PDX Fuel Facility is owned by Portland International Airport (PDX) and leased to and operated by PDX Fuel Company, LLC (PFC).

The PDX Fuel Facility is tasked with providing reliable jet fuel to PDX airport and must remain operational during construction. While most of the existing fuel facility infrastructure will be removed because of the previously submitted SVA; the existing fuel facility infrastructure must remain in place until the new facility infrastructure is installed and commissioned. Therefore, a phased construction approach with an approximate project completion in Q1 of 2029 is anticipated.

**Work That Has Been Completed**

1. The installation of Operations Building deep foundations.

**Ongoing Work**

1. Hydrant Cart Test Stand (HCTS) production piles are scheduled to begin in August of 2025.
2. The installation of underground utilities is ongoing.
3. Site preparation is progressing.

**Implementation Schedule (Anticipated)**

- Estimated Milestone Construction Dates are as follows:

Tank 5 Commissioned – August 2027

Tank 6 Commissioned – June 2027

Tank 7 Commissioned – July 2027

Hydrant Cart Test Stand (HCTS) / Truck Offload Commissioned – March 2026

### Jet Fuel Piping and Supports Commissioned – August 2028

- Estimated Milestone Demolition Dates are as follows:

Demolition of Tank 3 – February 2028

Demolition of Existing Dike Walls – March 2028

Demolition of Tank 1 and 2 – April 2028

Demolition of Non-Compliant Jet Fuel Piping – August 2028

### Risks to Implementation Timeline

As of June 2025, there are no anticipated risks to the implementation timeline.

### Action Items

The Owner will continue to implement the construction schedule to attain completion of the Risk Mitigation Activities by Q1 of 2029.

### Schedule to Complete All Proposed Mitigation

It is estimated that construction of the facility per the mitigation drawings will be completed by Q1 of 2029.

### Closing Remarks

This concludes the 2025 Annual Risk Mitigation Implementation Plan for the PDX Fuel Facility.

This document was prepared under direction or supervision in accordance with a system designed to provide qualified personnel to properly gather and evaluate the information submitted. Based on the inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the extent of our knowledge and belief, true, accurate and complete.

Sincerely,



Kaylea Michaelis – Structural Engineer of Record

Burns & McDonnell



Adam Kral – Senior Structural Engineer

Burns & McDonnell



Reid Unke – Project Manager

Burns & McDonnell

cc: Mark Soleta – Alaska Airlines  
Scott Baker – Menzies Aviation