



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5696

FAX (503) 229-6124

TTY 711

April XX, 2025

Manasi Chavan

Manager, Global Environmental & Engineering Services

Prologis, L.P.

Pier 1, Bay 1

San Francisco, CA 94111

sent via e-mail (mchavansharma@prologis.com)

DRAFT FOR PUBLIC COMMENT

RE: No Further Action Determination
Portland Meadows Site
1001 North Schmeer Road
Portland, Oregon
ECSI #6343

Dear Manasi Chavan:

The Oregon Department of Environmental Quality (DEQ) reviewed the available information for the above referenced property (the "Site"), including a February 13, 2025, *Construction Completion Report* and a November 13, 2024, *Source Control Evaluation Report* prepared by Farallon Consulting, L.L.C. DEQ's review was conducted under terms of a Prospective Purchaser Agreement in the form of a Consent Order with Prologis, L.P. finalized on August 7, 2019. The Site property consists of Multnomah County Parcel Nos. 1N1E100200, 1N1E03C00200, and 1N1E1000100 north of North Schmeer Road; and 1N1E1000300 south of North Schmeer Road.

DEQ has determined that remedial action to address environmental contamination at the Site is complete, and no further action is required. This determination is based on the DEQ regulations and the facts as we now understand them including, but not limited to the following:

- The Site property covers 120.7 acres. The Site north of Schmeer Road was developed with a horse racing venue that was constructed between 1946 and 1981, which included grandstands, stables, parking, and a stormwater retention pond. The Site south of Schmeer Road was not developed and was used for manure and soil management.
- A 520-gallon steel underground storage tank (UST) containing gas and diesel was removed from the eastern portion of the Site in 2004. Approximately 950 tons of petroleum-contaminated soil (PCS) was excavated and properly disposed. The release also impacted shallow groundwater and soil and was assigned leaking UST (LUST) file no. 26-04-1266. DEQ issued a conditional No Further Action (CNFA) determination on November 21, 2007. Due to residual contamination that could not be accessed due to the presence of Site structures, the CNFA specified "any future work in the contaminated area of the property, including any sampling, management, and disposal of contaminated media must be performed in accordance with DEQ regulations and policies."
- On August 8, 2019, DEQ entered into an Order on Consent (Consent Order) DEQ No. 19-07 with Prologis L.P. Under terms of the Consent Order, Prologis agreed to conduct additional investigation and cleanup of the leaking petroleum underground storage tank; prepare and implement a Media Management Plan containing procedures for identifying, handling, characterizing, and disposing of potentially contaminated soil or groundwater, if encountered, at the Property during construction and redevelopment activities; complete an Upland Source Control Evaluation; test soil for the presence of pesticides; and abandon the on-site water supply well.

- From July to October 2020 an additional 742 tons of petroleum contaminated soil was removed from the former UST area. Between May and July 2020 approximately 30 cubic yards of soil were removed to address releases of PCB-containing oils from vandalized transformers. Confirmation testing in residual soil following the two soil removals showed residual concentrations in soil were below applicable DEQ risk-based concentrations. Testing was also completed in the stable and horse manure management areas to assess the potential presence of pesticides. Detected concentrations were below applicable DEQ RBCs.
- The DEQ Source Control Evaluation report demonstrates that sources at the Site have been characterized and remediated, and that adequate stormwater control measures are in place to control upland sources to the Columbia Slough.
- The Site is zoned for general employment (EG2) and has been re-developed into a warehousing and logistic center complex. Drinking water is supplied by the City of Portland. An on-site supply well was decommissioned in August 2020. There are not current or reasonably likely future uses of groundwater at the Site.
- The soil removals addressed known contamination at the Site. Residual concentrations were below applicable RBCs for soil and groundwater. Thus, there are no completed exposure pathways for human health. The entire Site has been redeveloped, with most of the site covered with hardscape. There is little if any native vegetation or natural habitat; therefore, a formal ecological risk screening was not completed.
- DEQ held a public comment period in March 2025 to announce its proposal to issue a Certification of Completion and No Further Action determination. **[UPDATE FOLLOWING PUBLIC COMMENT]**.

Based on the available information, conditions at the Portland Meadows Site are currently protective of public health and the environment in accordance with Oregon environmental cleanup law, ORS 465.200 et seq. and Oregon Administrative Rules 340-122-0205 through 340-122-0360. The Site requires no further action unless new or previously undisclosed information becomes available, or there are changes in site development or land and water uses, or more contamination is discovered. DEQ has updated the [Portland Meadows Public File](#) to reflect this decision.

Site information and reports supporting this No Further Action decision can be viewed at: [Portland Meadows Web Documents](#). DEQ recommends keeping a copy of the DEQ documentation with the permanent facility records. If you have any questions, please contact Mark Pugh at (503) 229-5587 or mark.pugh@deq.oregon.gov.

Sincerely,

Kevin Parrett, Manager
Northwest Region Cleanup Program

e-copy: Sara Haynes, Farallon Consulting, L.L.C.