State of Oregon
# Department of Environmental Quality Memorandum

**Date:** 7/30/2025

**To:** FILE

**Through:** Brad Shultz (Cleanup Program Manager) Kaley Major (Toxicologist) and Bruce Scherzinger (Lead Worker)

**From:** Tina Elayer (Cleanup Project Manager)
Western Region

**Subject:** Truitt Bros. ECSI # 5638; Staff Memorandum in support of a No Further Action determination

This document presents the basis for the Oregon Department of Environmental Quality's (DEQ's) recommended No Further Action (NFA) determination for the Truitt Bros. Site (Site), in Salem. As discussed in this report, contaminant concentrations in soil, groundwater, and soil gas are below acceptable risk levels.

The proposed NFA determination meets the requirements of Oregon Administrative Rules Chapter 340 Division 122, Sections 010 to 0140 and ORS 465.200 through 465.455.

The proposal is based on information documented in the administrative record for this site. A copy of the administrative record index is presented at the end of this report.

## 1. BACKGROUND

**Site location.**
The site's location can be described as follows:
- Address: 556 Murlark Avenue NW, Salem, Polk County, Oregon.
- Latitude 44.94643° North, longitude -123.05270° West
- Tax lot 572206, Township 7 South, Range 3 West, Section 21

**Site setting.**
Baxter's North America is a contract manufacturer of shelf-stable food products with an approximately 165,000 square foot production, cold storage, and office building that was built around 1972 at the Site. The property is approximately 7.64 acres located in a commercial/industrial area and is surrounded by various commercial and industrial businesses. The property is zoned 990 Industrial in Polk County Assessor's records.

**Physical setting.**
The downtown area of Salem is situated in a relatively flat area, with the city bordered by the Eola Hills to the west and the Waldo Hills to the east. The southern and western parts of Salem

have more hills. Soil beneath the Site is generally capped by a layer of asphalt, gravel, or concrete. A thin layer of fill material was observed beneath exterior areas during investigation with approximately four to five feet of fill material under interior areas, The fill material generally consisted of mixed gravel and silt with varying sand. The native subsurface soil primarily consists of silt with varying clay and sand to a depth of approximately twenty (20) feet below ground surface (bgs) where gravel was encountered. Groundwater was found during investigation activities at depths ranging between approximately 13 feet and 22 feet bgs. The groundwater is assumed to flow northeast, east, and southeast per monitoring well data. Distance to the nearest surface water is approximately .20 miles towards the Willamette River.

**Site history.**
The Site consisted of vacant land in the 1920s and 1930s. Salem Box Company (small sawmill and box assembly operation) occupied the southwestern portion of the Site in from early 1940s to the mid-1950s. By 1955 the Site was occupied by Oregon Pulp & Paper & E&E Godsey. Succeed Environmental Consulting, LLC (SEC) did not identify specific details regarding site operations. Based on review of aerial photographs taken between 1955 and 1970, only small buildings were in the western portion of the Site and operations appeared minimal. By 1969 the Site was constructed to the current approximate configuration for use as a food processing and storage facility. From 1969 through 1985 Blue Lake Packers/Producers Coop operated until Agripac purchased the Site. Agripac operated from 1985 until 1999. In 2000 Chitaqua Processed Foods, LLC operated at the Site until 2003. Truitt Bros. resumed operations from 2003-2020. In 2011 the Site was listed in the ECSI database, ECSI 5638. The Site is currently owned by Baxter's North America.

## 2. BENEFICIAL LAND AND WATER USE DETERMINATIONS

**Land use.**
The building on the Site is currently used as a food manufacturing facility operated by Baxter's North America. There are currently no plans to change the use. However, the zoning designation for the property through the city of Salem is MU-III. MU-III is a Mixed-Use III zone, and the purpose is to identify allowed uses and establish development standards that encourage infill development and redevelopment in mixed-use corridors and promote pedestrian access. There have been properties in the downtown area where the original use was industrial, but the reuse included urban housing and even daycares.

**Groundwater use.**
Groundwater at the Site is not used for human consumption. Municipal water is provided by the city of Salem.

**Surface water use.**
The Willamette River is the nearest waterbody to the Site. There are no surface water bodies within the locality of facility (LOF). Stormwater that accumulates at the Site is expected to (1) infiltrate on-site or (2) flow towards catch basins located along the northern, western, and southern boundaries of the property, summarized as follows.

• The southern unpaved portions of the Site allow for infiltration of stormwater that accumulates during rainfall events. Roof drains located adjacent to the unpaved portions of the Site also discharge stormwater into the unpaved area.
• The northern paved portion of the Site is equipped with catch basins that connect to the municipal conveyance. Baxter's North America personnel noted that the city occasionally samples stormwater from these catch basins.
• A stormwater detention basin is located in the northeastern portion of the Site and receives (1) surface water runoff from the adjacent parking lots, and (2) stormwater runoff from adjacent nearby roof drains.

## 3. INVESTIGATION AND CLEANUP WORK

In 2011, DEQ received a complaint alleging that an unknown quantity of oil likely leaked from the radiant heating system coils located beneath the cold storage area of the facility. Following an onsite inspection, DEQ listed the project site on the Environmental Cleanup Site Information (ECSI) database (File No.5638). Truitt Bros. (the former property owner) temporarily deactivated portions of the radiant heating system, which exhibited signs of leaking. Sometime after 2011, the heating system was temporarily reactivated, but it was ultimately deactivated in 2016. Since that time, the oil was removed from the system, and was replaced by technology that does not utilize petroleum hydrocarbons.

Succeed Environmental Consulting LLC (SEC) conducted a subsurface investigation between July and August 2023 to evaluate the subsurface conditions near the perimeter of the cold storage area and beneath the central and northern portions of the cold storage area. On-site groundwater monitoring wells located to the east and north of the cold storage area were also sampled at this time. The monitoring wells were installed on the property during an investigation associated with a nearby site.

Field activities were conducted by SEC and the work included collecting samples from the six (6) on-site monitoring wells (MW-1, 2, 3, 4, 7, and 8), advancing eleven (11) direct-push borings (DP-1 through DP-11), and installation and collection of one sub-slab vapor sample (SV-1).

The Site map in the appendix shows the location of the soil, groundwater, and soil vapor samples.

<u>Soil Sampling</u>
SEC advanced direct-push borings (DP-1 through DP-7) to depths of up to 30 feet below ground surface (bgs) on July 12, 2023. SEC returned to the Site on August 19, 2023, and advanced direct-push borings (DP-8 through DP-11) to depths of up to 16 feet bgs. Soil samples were collected from each boring and screened in the field using visual examination, water sheen screening, and headspace vapor screening using a hand-held photo ionization detector (PID). Petroleum-like sheens, discoloration, staining, or odors were otherwise not observed in the soil obtained by SEC during the investigation. SEC selected at least one soil sample from each direct push boring for chemical analysis. The soil samples selected for analysis were placed into labeled, laboratory-prepared containers and immediately placed in a cooler with ice and transported under chain-of-custody procedures to the chemical analytical laboratory.

Groundwater sampling

Groundwater samples were collected from borings DP-4 and DP-6 using equipment that is owned and operated by Cascade Drilling. Cascade placed new disposable 3/8-inch polyethylene tubing into temporary wells to depths of approximately three to five feet above the bottom of each well. Water was slowly purged using a peristaltic pump. Upon purging each well, SEC collected groundwater samples directly from the tubing into laboratory-prepared sample containers for transport to the chemical analytical laboratory.

Groundwater samples were collected from groundwater monitoring wells (MW-1, MW-2, MW-3, MW-4, MW-7 and MW-8) on July 11, 2023. SEC relied on dedicated tubing that is located within the monitoring wells, and groundwater was slowly purged using a peristaltic pump. Upon purging each well, SEC collected groundwater samples directly from the tubing into laboratory-prepared sample containers.

Soil Vapor Sampling

On August 19, 2023, SEC collected one soil vapor sample (SV-01) from the Site. A decontaminated stainless-steel soil gas probe was connected to disposable polytetrafluoroethylene tubing to an approximate depth of 0.5 feet bgs. The annular space between the vapor point and boring sidewall was sealed with hydrated bentonite and a leak-check system was installed. Connections and fittings were wrapped with cloths soaked in isopropyl alcohol. 2-propanol was not detected in laboratory samples at a concentration of < 0.01%, which indicated the sampling train was airtight. Approximately 30 minutes after installing the sampling train, the sample was collected in a laboratory-supplied TO-15 sorbent tube equipped with a flow controller. During this time, approximately one liter of air was drawn through the sorbent tube at a rate of approximately 200 ml/min.

Soil, groundwater, and soil vapor samples were submitted by SEC to Apex Laboratories of Tigard, Oregon and Friedman & Bruya, of Seattle Washington for the following analysis:

- Diesel- and oil-range organics by Method NWTPH-Dx (Soil and Groundwater)
- PCBs by EPA Method 8082A (Soil)
- Diesel Fuel Range Hydrocarbons by EPA Method TO-17 (Vapor)

After consulting with DEQ toxicologist on a different site the project manager noticed two missing aroclors (1262, 1268) that were needed to determine whether total PCBs were present on site. SEC was able to work with the labs and reanalyze the data to include the two missing aroclors in soil and soil-gas data.

DEQ requested additional subsurface investigation as the laboratory reporting limits for diesel-range hydrocarbons ranged between 187 µg/L and 263 µg/L, which were slightly greater than DEQ's most stringent risk-based concentration (RBC) for residential drinking water (100 µg/L).

DEQ was also concerned about potential PCB contamination from residual PCBs in pipes due to the facility's use before 1980 and requested additional sampling and analysis to rule out the presence of PCBs. DEQ also noted that there was one soil vapor sample collected and acknowledged that no contamination was identified. However, while the vapor sample did not

exceed screening levels or detection limits for diesel constituents, it did not provide enough information for DEQ to provide a no further action determination.

A supplemental subsurface investigation was conducted on April 29, 2025, and consisted of collecting groundwater samples from three (3) direct-push borings (DP-12 through DP-14), and the collection of three (3) sub-slab vapor samples (SV-2 through SV-4).

**Nature and extent of contamination.**

Soil

Nineteen (19) soil samples were collected and analyzed at depths of 16 feet bgs and 30 feet bgs. Petroleum hydrocarbons were not detected at concentrations greater than the lab reporting limits which were all below the respective risk-based concentrations (RBCs). No oil range organics were detected therefore polyaromatic hydrocarbons analysis was not required.

Seven (7) soil samples were also analyzed for PCBs. PCBs were not detected and lab reporting limits were also all below the respective risk-based concentrations.

Groundwater

Groundwater was encountered at depths ranging from 13 feet bgs to 22 feet bgs in the direct-push borings. There were diesel and oil range organic detections in the groundwater in all the monitoring wells and temporary wells DP-4 and DP-6. Three groundwater samples were also analyzed for the majority of PCB Aroclors and were not detected. While laboratory detection limits for PCBs were above RBCs, no evidence of PCB contamination was identified at the Site (i.e. soil).

Soil Vapor

Soil vapor sample SV-01 was analyzed for diesel-range organics by Method TO-17. Diesel was not detected, and laboratory reporting limits were less than comparable RBCs in the sample submitted for analysis. Three additional sub-slab vapor samples (SV-2 through SV-4) were collected and analyzed in April 2025. These samples confirmed that the there is no indication of vapor intrusion risk at the Site.

## 4. RISK EVALUATION

**Conceptual site model.**

To evaluate human exposure to residual chemical contamination requires an assessment of the type and extent of that exposure. This is based on current and reasonably likely future site use. DEQ publishes risk-based concentrations (RBCs) for contaminants commonly encountered, for different types of exposure scenarios. These RBCs are conservative estimates of protective levels of contaminants in soil, groundwater and air. Table 1 shows potential exposure pathways and receptors for this site. Based on this, applicable RBCs are identified and used for risk screening.

**Table 1. Identification of applicable RBCs, based on pertinent pathways and receptors**

| | Pathway | Receptor | Is pathway complete? | Is RBC Exceeded? | Comments |
|---|---|---|---|---|---|
| Soil | Ingestion, Dermal Contact, and Inhalation | Residential and/or Urban Residential | NO | NO | |
| | | Occupational | NO | NO | |
| | | Construction Worker | NO | NO | |
| | | Excavation Worker | NO | NO | |
| | Volatilization to Outdoor Air | Residential and/or Urban residential | NO | NO | |
| | | Occupational | NO | NO | |
| | Leaching to Groundwater | Residential and/or Urban residential | NO | NO | |
| | | Occupational | NO | NO | |
| Groundwater | Ingestion & Inhalation from Tap Water | Residential and/or Urban residential | NO | NO | See note 1. |
| | | Occupational | NO | NO | See note 1. |
| | Vapor Intrusion into Buildings | Residential | NO | NO | |
| | | Commercial | NO | NO | |
| | Groundwater in Excavation | Occupational | NO | NO | |
| Soil Vapor | Vapor Intrusion into Buildings | Residential | NO | NO | |
| | | Commercial | NO | NO | |
| Ecological | | Terrestrial & Surface Water | NO | NO | |

Notes:

1. Groundwater is not used for drinking. This pathway is therefore not considered, in accordance with Section B.3.2.4 of DEQ's RBDM guidance. City water is provided. Local groundwater is not currently used for drinking water and is not likely to be used for this purpose in the future.

**Contaminant concentrations.**
Groundwater
Diesel and oil range organics were not detected in 2023 samples, but laboratory detection limits were also above RBCs. In order to provide DEQ with greater certainty for their issuance of a no further action determination for the Site, the 2025 groundwater samples were analyzed using a lower laboratory detection limit. The diesel-range hydrocarbon laboratory detection limits associated with the 2025 investigation ranged between 74.8 µg/L and 75.5 µg/L, which is less than the residential drinking water RBC of 100 µg/L.

**Human health risk.**
Drinking water at the Site is provided by municipal water and the groundwater has no beneficial use. No other contaminants of concern were detected in soil or soil vapor at the Site above risk-based concentrations.

**Ecological risk.**
The Site is industrial and paved in asphalt, there is no ecological habitat available.

## 5. RECOMMENDATION

After receiving and reviewing the results from the supplemental subsurface investigation a no further action determination is recommended for this Site.

## 6. ADMINISTRATIVE RECORD

Oregon Department of Environmental Quality (DEQ) Pollution Complaint No.WRS-11-0062, dated April 13, 2011.

Email Correspondence Re: Truitt Brothers-Salem, OR between Oregon DEQ and U.S. E.P.A. dated April 13, 2011

Oregon Department of Environmental Quality (DEQ) letter Re: Complaint Investigation; HWWRS-11-0062; Truitt Bros.; OHWIME #8795, dated July 28, 2011.

Email Correspondence Re: TBI Leak between Seneca Foods Corporation personnel and Truitt Bros. personnel dated May 20, 2016, and May 23, 2016.

Phase I Environmental Site Assessment; Truitt Facility; 556 Murlark Ave, 845 Bassett Street NW & 925 Patterson Street NW; Salem Oregon prepared by GZI of Trumbull, CT, dated November 23, 2020.

Order of Magnitude Estimate of Cost; Truitt Facility Subslab Transformer Oil Release; 556 Murlark Ave; Salem Oregon prepared by GZI of Trumbull, CT, dated December 7, 2020.

Property Condition Assessment; Truitt Brothers; 556 Murlark Avenue, 845 Bassett St NW and 925 Patterson St NW; Salem Oregon prepared by Vieau Associates of Edina, MN, dated

December 14, 2020.

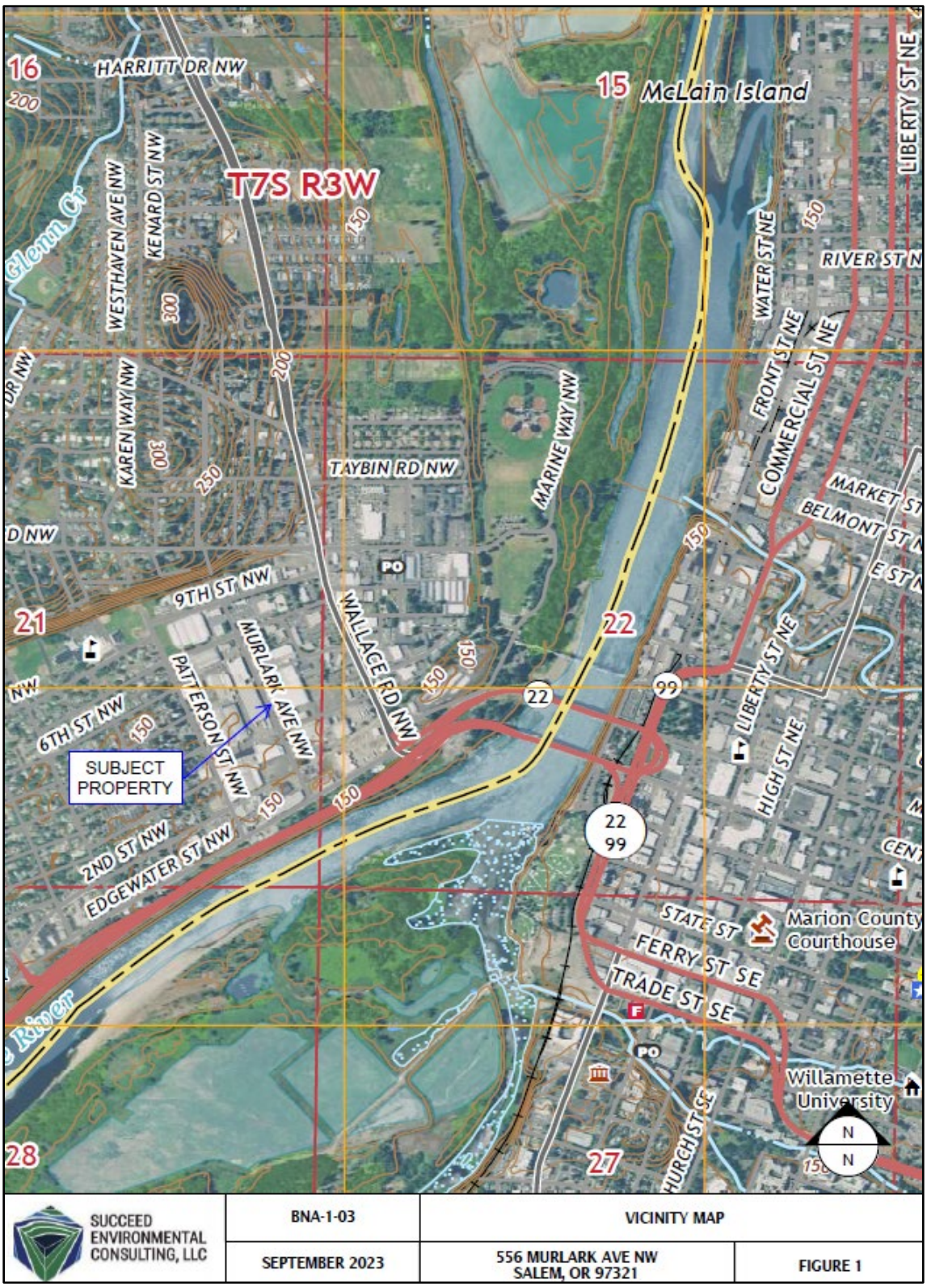
Sampling and Analysis Plan; 556 Murlark Ave NW, Salem, Oregon 97321, prepared by SEC, dated June 1, 2023.

Subsurface Investigation Report; 556 Murlark Ave NW, Salem, Oregon 97321, prepared by SEC, dated September 27, 2023.

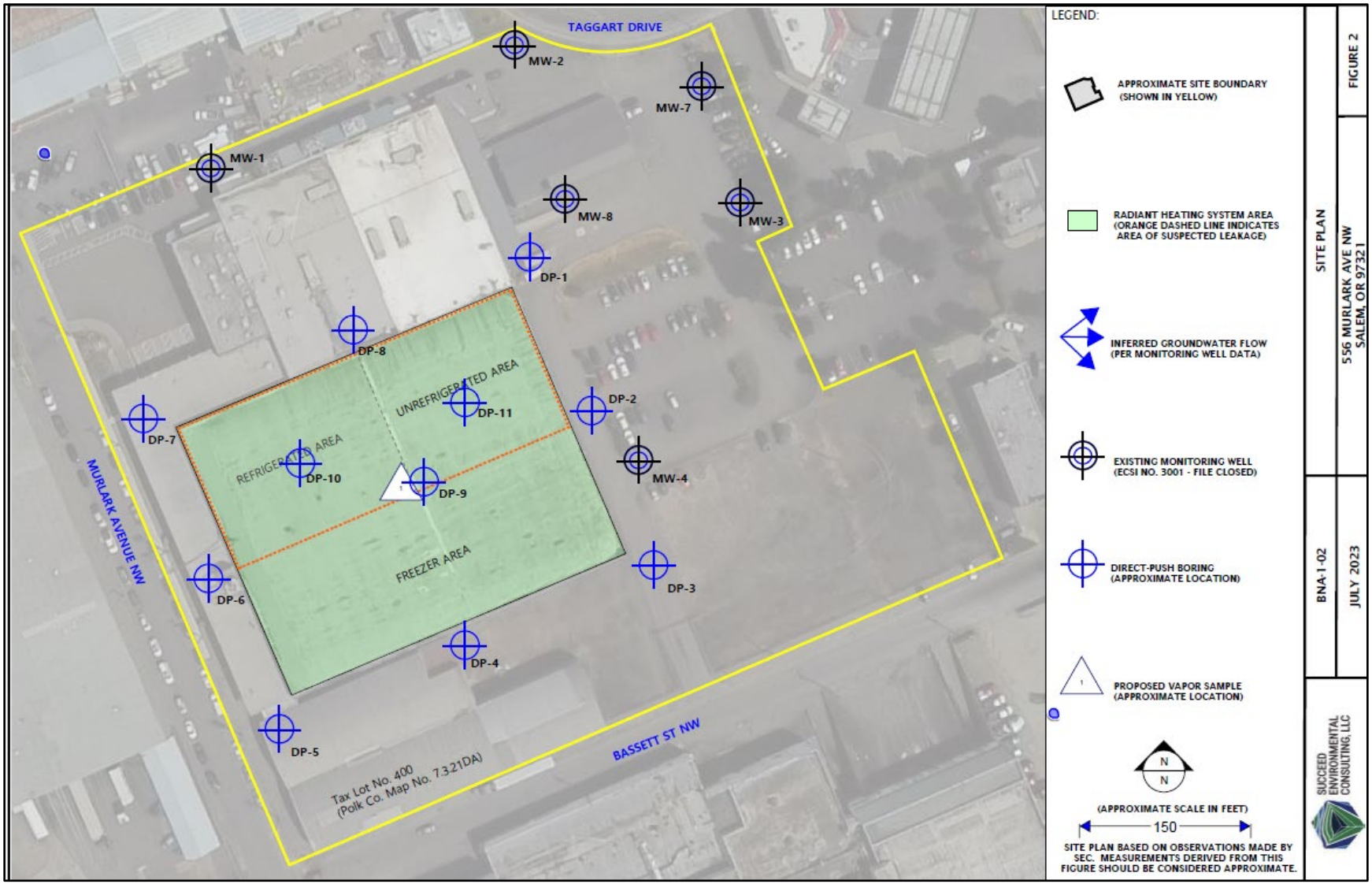
Supplemental Subsurface Investigation Report; 556 Murlark Ave NW, Salem, Oregon 97321, prepared by SEC, dated May 23, 2025.

## 7. ATTACHMENTS

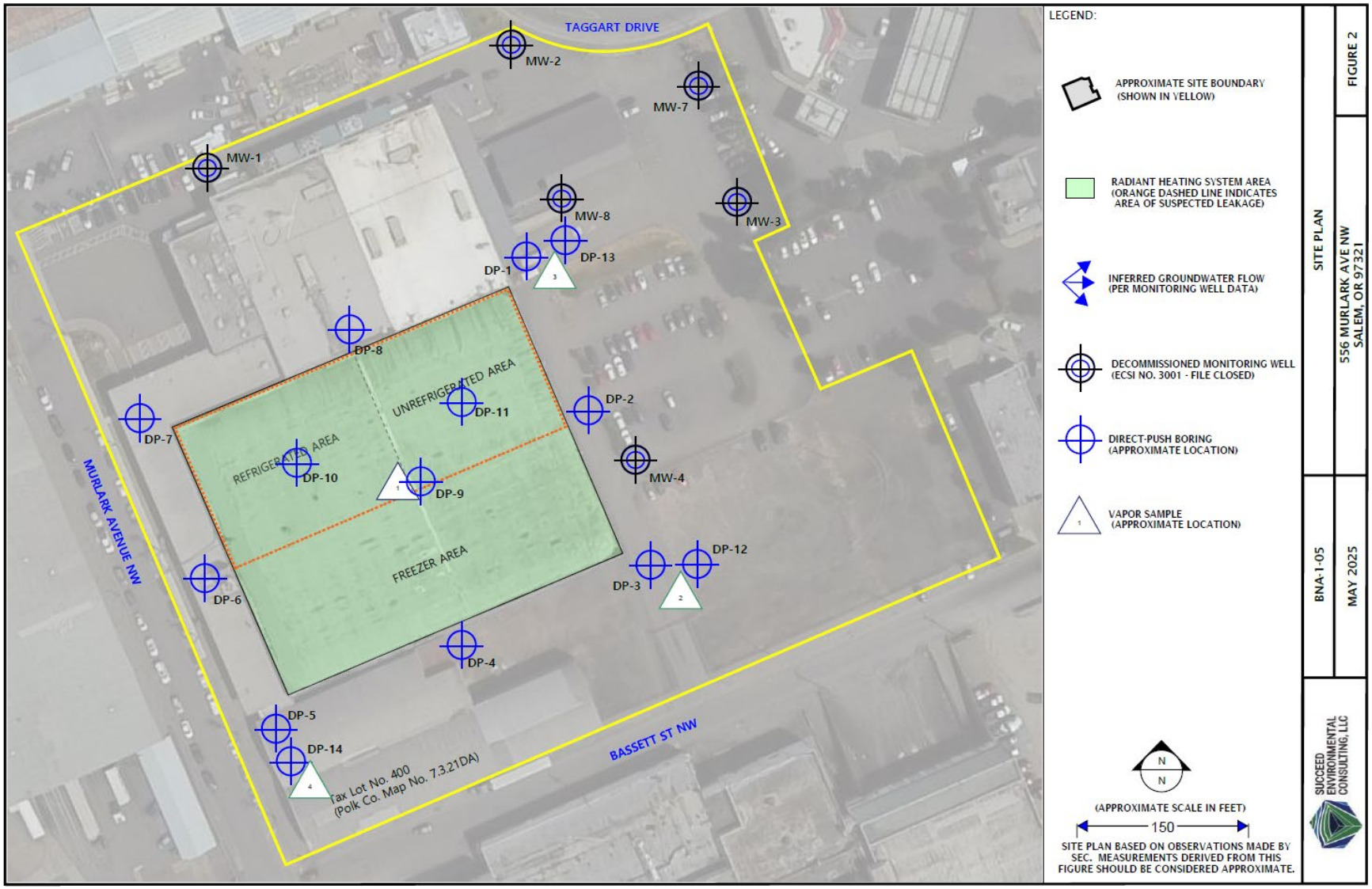
1. Vicinity map
2. Site map
3. Supplemental Subsurface Investigation Site map




Vicinity map (Retrieved from SEC Subsurface Investigation Report, September 27, 2023).




Site map (Retrieved from SEC Subsurface Investigation Report, September 27, 2023).




Supplemental Subsurface Investigation Site map (Retrieved from SEC Supplemental Subsurface Investigation Report, May 23, 2025).