Springdale

Ford, Lynn

EXHIBIT "A"

From: Ritz, Mike
Sent: Monday, October 27, 2008 2:46 PM
To: Ford, Lynn
Subject: FW: Springdlale Creek Apartments
Attachments: SCA Site History_101708.doc

print plse thx mr

From: Madlock, Yvonne
Sent: Mon 10/27/2008 12:38 PM
To: Ritz, Mike
Cc: Lachapelle, Norman; Huntzicker, James
Subject: Springdlale Creek Apartments

Commissioner Ritz:

In response to your request, attached is the Summary Site History regarding Springdale Creek Apartments prepared by TN Department of Environment and Conservation(TDEC). The full Institutional Control Operation and Maintenance Plan completed by Ensafe, Inc. (200+ pages) is available on CD if you would like a copy. Also if you would like to visit the site, please contact Norman Lachapelle, Administrator of Environmental Health Services (544-7582) who would be happy to take you on a "tour".

Please let me know if you have additional questions or want more information.

<<SCA Site History_101708.doc>>

Yvonne Madlock

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Springdale Creek Apartments (79-820)
Memphis, Shelby County

The Springdale Creek Apartments is located at 2510 Jackson Ave in Memphis, TN and is owned by the Health Educational and Housing Facility Board of the City of Memphis. Springdale Memphis, L.P. leases the property from the Health Educational and Housing Facility Board of the City of Memphis and has developed the Springdale Creek Apartments as a "qualified residential rental project". The apartment complex is organized to provide multifamily residential rental property to rent to low-income tenants.

The southern portion of the property was operated for approximately sixty years as an auto salvage yard, resulting in contamination from metals (lead) and Volatile Organic Compounds (VOC), specifically TPH and TCE. Cypress Creek crosses the northern portion of the property.

Cypress Creek is a 7.5-mile tributary of the Wolf River that drains a large portion of north Memphis and was historically used as a conveyance for wastewater discharge by Velsicol Chemical Corporation and various other industrial facilities. Cypress Creek was widened and channelized during the 1960s and 1970s by the City of Memphis as part of a flood control project. Sediments containing industrial wastes, specifically organochlorine pesticides were placed on properties adjoining Cypress Creek, including the subject property, during the channelization effort resulting in pesticide contamination on the northern portion of the property.

The south side of the property was investigated and remediated by Springdale Memphis, L.P. as directed by the Tennessee Department of Environment and Conservation (TDEC), Division of Remediation (DoR). Work plans and specification were reviewed jointly by the TDEC, Tennessee Department of Health, and the Memphis and Shelby County Health Department and the three agencies agreed that the remedial actions on the south side were appropriate to protect human health prior to DoR approval for Springdale Memphis, L.P. to perform those actions.

During the site investigation, EnSafe, Springdale Memphis L.P.'s consultant, found elevated lead concentrations along the western and eastern property lines of the Site. As a result of this investigation, TDEC and the United States Environmental Protection Agency (EPA) identified off-site soil contamination that was determined to originate from the former auto salvage yard property. In April 2005, the Division of Remediation sampled the adjacent Springdale Elementary School and confirmed that elevated levels of lead were present on the school property. Springdale Memphis, L.P. agreed to perform a removal action at the school and approximately 1,300 tons of impacted soil was excavated from the schoolyard for disposal.

The Division of Remediation collected soil samples from thirty-two residential locations along Meagher Street in January 2006. Of the thirty-two samples analyzed, lead was detected in seventeen of the samples at elevated levels. At the request of TDEC, the EPA conducted a removal assessment to determine which properties identified by TDEC should be considered for a possible removal action. In January 2007, the EPA conducted a Removal Action to address the areas identified during the removal assessment. The Removal Action included eight of the

seventeen elevated lead locations identified by TDEC. A total of 360 cubic yards of impacted soil was excavated from the Meagher Street properties for disposal.

No remedial efforts have yet been undertaken on the north side of the property. The north side of the property remains contaminated with concentrations of pesticides in soils that preclude it from being used as a residential site without further investigation and subsequent action to eliminate the potential threat to human health. This northern portion of the Springdale property is fenced to prevent trespass as TDEC has determined that in its current condition it is not an appropriate place for children or adults to use or congregate.

The Division of Remediation, the Tennessee Department of Health, and the Memphis and Shelby County Health Department, are currently reviewing the revised Institutional Control, Operation and Maintenance Plan for the south side of the property, which was received on 09/23/08. DoR noted operation and maintenance concerns during recent visits to the south side of the property, including evidence of trespass onto the northern end of the property. TDEC-DoR will discuss these concerns with Springdale Memphis, L.P. and the HEHFB in the coming weeks.

As part of TDEC's ongoing investigation at the site, a TDEC-DoR contractor recently completed fieldwork for a passive Gore Sorber™ soil gas survey on the north end of the Springdale property and a report of results should be submitted during November 2008. When this report is received, TDEC-DoR will discuss the findings with the Tennessee Department of Health and the Memphis and Shelby County Health Department to determine the step that should be taken next.

File information is maintained under the following site names/numbers at TDEC's Memphis Field Office and TDEC's Nashville Central Office:

- Springdale Creek Apartments (79-820)
- Springdale North Side (79-863)
- Auto Parts and Salvage of Memphis/Springdale Elementary School (79-828)
- Meagher Street (79-831)

TDEC-Division of Solid and Hazardous Waste Management (DSWM) provides regulatory oversight for current investigative and remedial activities along Cypress Creek. Further information regarding these activities may be acquired by contacting TDEC-DSWM.