

**PHASE II ENVIRONMENTAL
SITE ASSESSMENT REPORT**

**TAX PARCEL 083021 00054
2630 EPPING WAY
MEMPHIS, TENNESSEE 38128**

**EnSafe Project Number
0888810687/PH26.P and PH26.H**

Prepared for:

**Wolf River Brownfield Assessment Project
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March 25, 2013

Executive Summary

In support of the Wolf River Brownfields Assessment Project, EnSafe conducted a Phase I Environmental Site Assessment (ESA) of Tax Parcel 083021 00054, 2630 Epping Way in Memphis, Shelby County, Tennessee (subject property). Based on the Phase I ESA, the site was selected for a Phase II ESA. This document presents the results and recommendations of the Phase II ESA.

Site Description

The 66.09-acre vacant subject property at 2630 Epping Way is in a primarily residential area of Raleigh, a suburban community in north-central Memphis, Tennessee. Remnants of the former Epping Forest Club remain onsite, including Epping Way Drive and turnaround, the clubhouse foundation, the tennis court base and fencing, light poles, metal and polyvinyl chloride pipes, a fire hydrant, and wood debris.

During the Phase I site visit, EnSafe observed evidence of recreational users including a make-shift boat, camp-like fire pits, fishing equipment, all-terrain vehicle tracks, and food and beverage containers. Miscellaneous containers, construction and demolition debris, and household trash were observed sporadically throughout the property with most concentrated around the former country club and west side of the lake (formerly accessible by vehicle from Epping Way Drive). Those materials included: roof shingles, pieces of wood, 5-gallon metal and plastic buckets, tires, bricks, plastic gallon jugs, a propane gas cylinder, and chairs. All containers observed were deteriorated (e.g., rusted and/or crushed), empty, and partially covered by leaves or vegetation.

The central feature of the subject property is an approximately 20-acre kidney-shaped lake that was excavated as a borrow pit on the subject property in the early 1970s. The excavated material was used to develop the north-adjointing apartment complex and to support widening and channelizing of, and constructing levees (spoil banks) along, the nearby Wolf River. At their nearest points under normal conditions, the northeast portion of the lake and the Wolf River are approximately 150 feet apart and the south/central portion of the lake and Wolf River are 200 feet apart. During periods of heavy flooding, such as in May 2011, the Wolf River may overflow onto the subject property and the Wolf River water would co-mingle with the water in the lake.

Site History

The subject property was part of a larger parcel of land owned by private individuals from at least 1898 to the 1960s. In 1948, Berry Brooks purchased over 200 acres, which included the subject property, and used the land to keep peacocks and raise cattle and lived on the subject property at Epping Forest Manor. When he retired in 1972, Mr. Brooks sold most of his property — bound on the north by James Road, on the west by Highland Street, and on the east and south by the Wolf River — for a planned community development of residences and commercial properties.

In the early 1970s, soil was borrowed from the portion of the subject property that is now a lake and, by 1974, the Epping Forest Club (country club) parking lots, tennis courts, swimming pool, and clubhouse were under construction. By the late 1970s, the country club was fully developed and the borrow area had filled with water. The country club ceased operating by the early 1980s and the property owners defaulted on a loan, causing the subject property to be sold by public auction in 1990. From the 1980s until 2007, the former site improvements deteriorated and unauthorized

dumping occurred. The property was donated to the Memphis City Schools (MCS) in 2007, after which MCS razed the former country club building, removed abandoned cars, tires, shingles, and junk that had been dumped onsite, and hauled all the material offsite for disposal. MCS then secured the facility from future dumping by installing gates and soil berms to prevent vehicle access, filled the swimming pool with soil, and left the concrete in place.

Previous Investigations

EnSafe conducted a Phase I ESA in April 2012, which recommended this Phase II ESA. The Phase I ESA did not identify any previous environmental assessments of the subject property.

Recognized Environmental Conditions

Based on the intended use of the subject property for recreational purposes, overflow of water from the Wolf River, a Category 5 stream with a fishing advisory, could potentially co-mingle with water in the subject property lake during heavy flooding. The potential impact to the site lake by co-mingling with the Wolf River was considered a *recognized environmental condition*. In the Phase I ESA, EnSafe recommended surface water and sediment sampling to establish a baseline of contaminants, if present, in the lake and, as appropriate, a risk evaluation to ensure suitability for future use, which may include direct contact and fishing, and determine the need for continued monitoring after periods of heavy rain that causes the Wolf River to overflow onto the subject property.

Business Environmental Risks

Solid waste material — including construction or demolition debris, remnants of former structures, and discarded items — encountered during redevelopment and reuse was suspected as asbestos containing materials (ACM), the onsite disposal of which constitutes a *recognized environmental condition*. In the Phase I ESA, EnSafe recommended sampling material suspected of containing asbestos to determine appropriate disposal options and to address the potential *business environmental risk* associated with liability and costs of disposal.

The potential for PCBs to have been used in the swimming pool's construction materials poses a *business environmental risk* if future use of the subject property involves excavation and disposal of the concrete and/or underlying/surrounding soil. Exposure to PCB-containing material from the swimming pool associated with the planned use for the site is mitigated because it has been filled and covered with soil and vegetation.

Phase II Environmental Site Assessment Results

The Phase II ESA scope of work was based on the findings of the Phase I ESA to assess the potential release of hazardous materials and petroleum products to the sediment and surface water of the site resulting from historical flooding by the Wolf River. To complete this assessment, surface water and sediment samples were collected for laboratory analysis for chlordane, polychlorinated biphenyls (PCBs), and dioxins. Chlordane and PCBs were not detected in either surface water or sediment samples. Dioxins were detected in both surface water and sediment samples, but were at concentrations below screening values.

The Phase I ESA also identified the potential for ACM in roofing materials disposed of onsite. Samples were collected and submitted for analysis, but no ACM was detected.

Based on the laboratory results for surface water, sediment, and roofing material samples, no further action is recommended for the Epping Way site.