## Memorandum



DATE June 11, 2021

TO Honorable Mayor and Council Members

## Former Blue Star Recycling Site (9505 & 9527 S. Central Expressway) Environmental Site Assessment Reports

This memorandum provides information on the Environmental Site Assessment Reports for the former Blue Star Recycling site (the "Site") located at 9505 & 9527 S. Central Expressway, Dallas, TX owned by CCR Equity One LLC. These reports will be made available online today at:

## https://storymaps.arcgis.com/stories/0a10210bd0924f1e96774834c6f0eda2

Legal issues associated with the acquisition of the Site were discussed in Executive Session during the May 19, 2021 Council Briefing Agenda. Previously, the City of Dallas completed the removal of the shingles, shingles mixed with soil, and associated materials from the site under the Agreed Final Judgment on April 30, 2021. Under the Agreed Final Judgment, the City of Dallas has 180 days to complete the environmental assessment of the site. Pursuant to the Agreed Final Judgment, the City of Dallas has the option to acquire the site for no cost. The City must provide notice to CCR Equity One LLC within 30 days of completing the environmental assessment.

On June 9, 2021, City Council approved acquisition of the Site. The City will not initiate environmental response beyond the shingle removal completed until future ownership and use of the site is finalized.

The Phase I Environmental Site Assessment (ESA) report dated April 9, 2021 prepared by Modern Geosciences found two Recognized Environmental Conditions (REC) associated with the site: (1) Historical filling at the site. This was based on a review of available aerial photographs (stockpiling and filling was identified in the 1970s and 1980s). Additionally, evidence of filling with concrete, wood, metal, and local areas of general rubbish was noted on the western half of the site during shingle removal operations; and (2) Former Little Bill's Auto Salvage Yard/Former Aboveground Storage Tank. The Phase I ESA recommended further investigation to evaluate these RECs.

The Phase II Site Investigation Report dated June 7, 2021 prepared by Modern Geosciences included the installation of four monitor wells (soil collected during installation for analysis) and eight test pits. The soil and groundwater samples were collected for heavy metals, volatile organic compounds (VOC), semi-volatile organic compounds (sVOC), and total petroleum hydrocarbons (TPH). Soil and groundwater samples found concentrations either below laboratory detection limits or below regulatory

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screening levels for metals, VOC, sVOC, and TPH. Lead and arsenic concentrations found appear to be protective of groundwater. Lead concentrations in 3 of the 8 test pits and in soil from 1 of the 4 monitor wells were above the residential total soil level and below the commercial/industrial total soil level.

As part of the site investigation, site conditions are compared to the Residential Assessment Level (RAL) under the Texas Commission on Environmental Quality (TCEQ), Texas Risk Reduction Program (TRRP). If the concentrations found are below the applicable RAL then no further action would be necessary. Since some concentrations are above the RAL, additional effort under the TRRP will be necessary for the site to achieve regulatory closure. Future site use will drive the response effort as a commercial/industrial use has different requirements than a residential use.

For reference, a summary of Modern Geosciences findings and conclusions are included here:

- Based on the results of this investigation, no soil samples collected at the Site exhibited VOCs, TPH, or SVOCs above TRRP residential criteria. Elevated arsenic (up to 14.2 mg/Kg) and lead (up to 1,450 mg/Kg) concentrations were noted above expected background levels. While the elevated arsenic and lead concentrations appear to be protective of groundwater, a total of four (4) soil samples exhibited a concentration of lead above the TRRP Residential TotSoilcomb PCL of 500 mg/Kg.
- Based on the results of this investigation, no groundwater samples collected at the Site exhibited VOCs, TPH, SVOCs, or metals above TRRP residential criteria. Static groundwater was encountered at depths ranging from 10.55 to 13.91 feet below grade with a slight gradient to the east-northeast.
- The investigation effort confirmed that potential solid waste (e.g., non- material)
  was present within fill material at the Site. Screening for landfill gases within the
  test pits and monitor wells did not identify significant concentrations of methane
  or hydrogen sulfide.
- Identification of a release above applicable regulatory thresholds can impose reporting obligations to owners and/or operators of a property. The fill material encountered that contains solid waste, may require additional permitting and/or corrective action to address this material.

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If you have questions or need additional information, please contact me or Michael Gange at Michael.Gange@dallascityhall.com or 214.670.1642.

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