



## FY26 EPA Brownfield Cleanup Grant Application

### CITY OF MEMPHIS AND SHELBY COUNTY COMMUNITY REDEVELOPMENT AGENCY

#### Application Information Sheet

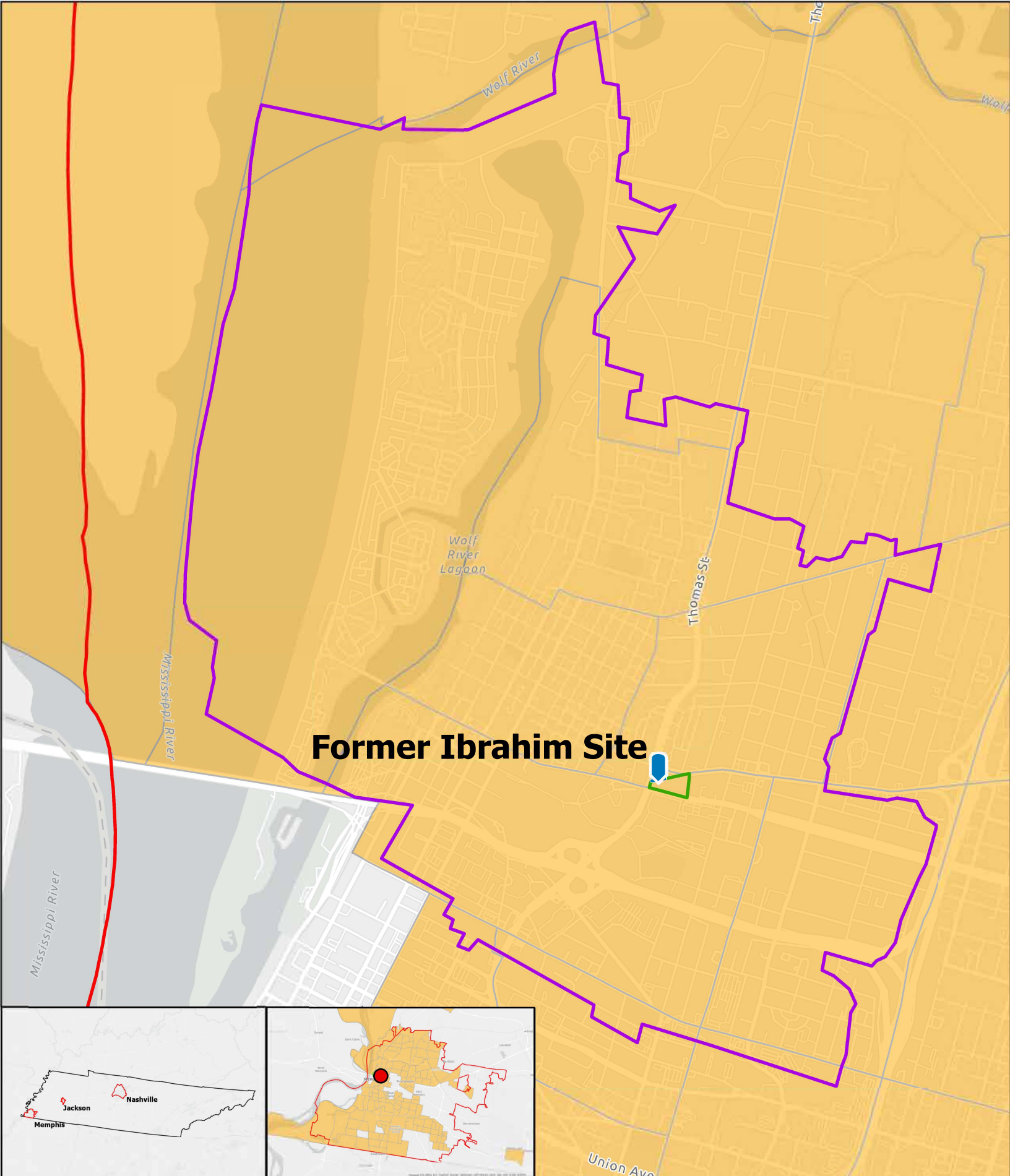
1. Applicant Identification:  
City of Memphis And Shelby County Community Redevelopment Agency  
850 N Manassas  
Memphis, Tennessee 38107-2516
2. Website URL: <https://cramemphis.org/>
3. Funding Requested:
  - a. Grant Type – Single Site Cleanup
  - b. Federal Funds Requested - \$765,000
4. Location:
  - a. City of Memphis
  - b. Shelby County
  - c. Tennessee
5. Property Information:  
Former Ibrahim Site  
0 Danny Thomas Way; 544 and 645 Jackson Avenue  
Memphis TN 38105  
See Map attached
6. Contacts:
  - a. Project Director:  
Vivian Ekstrom  
Telephone: 901-482-8315  
Email: vivian.ekstrom@cramemphis.org  
Community Redevelopment Agency of Memphis & Shelby County  
170 N Main St, 6th Floor  
Memphis, TN 38103
  - b. Chief Executive: Andrew Murray, President  
Telephone: 901-435-6992  
Email: andrew.murray@cramemphis.org  
Community Redevelopment Agency of Memphis & Shelby County  
170 N Main St, 6th Floor  
Memphis, TN 38103
7. Population: City of Memphis: 610,919 (2024 US Census)
8. Other Factors:

Other Factors	Page #
Community population is 10,000 or less.	NA
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	NA

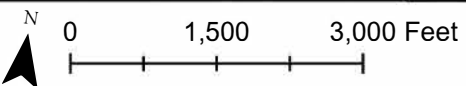
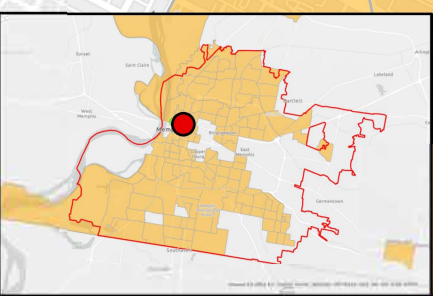


The priority site(s) is impacted by mine-scarred land.	NA
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	NA
The priority site(s) is in a federally designated flood plain.	NA
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	NA
<b>The reuse of the priority site(s) will incorporate energy efficiency measures.</b>	<b>3</b>
<b>The reuse strategy or project reuse of the priority site(s) considers climate adaptation and/or mitigation measures.</b>	<b>3</b>
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2012 or later) or is closing.	NA

9. Releasing Copies of Applications: No confidential information is included in this application.



# Former Ibrahim Site



-  Priority Sites
-  Areas of Persistent Poverty
-  Memphis Boundary
-  Uptown District

Memphis Tennessee- EPA Cleanup Application



**TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION**  
DIVISION OF REMEDIATION  
DAVY CROCKETT TOWER, 7<sup>TH</sup> FLOOR  
500 JAMES ROBERTSON PARKWAY  
NASHVILLE, TENNESSEE 37243

January 14, 2026

CRA President Andrew Murray  
P.O. Box 70386  
Memphis, TN 38107

Re: State Letter of Acknowledgement for the FY26 EPA Brownfields Cleanup  
Grant Application

Mr. Murray,

The Tennessee Department of Environment and Conservation (TDEC) is pleased to acknowledge the City of Memphis and Shelby County Redevelopment Agency's (CRA) efforts to apply for a FY26 US Environmental Protection Agency (EPA) Brownfields Cleanup Grant.

We acknowledge the CRA has developed an application requesting site-specific federal brownfields cleanup funding for a former commercial property known as the Ibrahim "Chism Trail" site (parcel numbers: 001107 00001, 001106 00001, and 001096 A00099). Once remediated, we understand the targeted site is planned to be developed into a mixed-use site.

TDEC affirms that:

- i. The applicant has requested State oversight for the site and is currently receiving oversight from TDEC.
- ii. The site is eligible to be overseen by the TDEC Voluntary Cleanup Oversight and Assistance Program (VOAP).
- iii. Based on the numerous Phase I and Phase II Environmental Site Assessments conducted since 2006, there are known and documented soil and groundwater impacts at the site including chlorinated solvents, gasoline constituents, and polycyclic aromatic hydrocarbons. Additional assessment has been initiated, with state oversight, to fine tune the

delineation of these impacts and is expected to sufficiently characterize the site by June 15, 2026.

Since many brownfields are abandoned, underutilized, and/or contaminated, TDEC is expressly interested in seeing initiatives to return these sites to productive uses. This effort is consistent with our mission to enhance the quality of life for citizens of Tennessee and to be stewards of our natural environment. In cooperation with Region 4 EPA, the TDEC brownfields staff will provide technical support and oversight for your grant.

We greatly appreciate your efforts to address brownfields in Memphis and Shelby County, Tennessee.

Sincerely,

*Paula Middlebrooks*

Paula Middlebrooks  
State of Tennessee Brownfields Redevelopment Program

## NARRATIVE

### (1) PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

#### Target Area and Brownfields

a. Overview of Brownfield Challenges and Description of Target Area: Since the 1960s, the City of Memphis pursued a policy of annexation in an effort to increase its tax base and enjoy the benefits of suburban development. The expansion had a dramatic impact on the urban core as resources and investments turned their figurative back on the oldest and poorest parts of the city, including our target area, the Uptown District, just north of downtown. According to the City's master land use plan, *Memphis 3.0*, the expansion resulted in substantially more land and infrastructure to maintain, with a lack of population and revenue to support it. To exacerbate the lack of municipal resources, deindustrialization and depopulation occurred in Memphis, including the Uptown District. As major employers (such as Firestone Tire & Rubber Co.) left the area in the 1980s, a sudden and dramatic decrease in the number of local jobs led to higher unemployment and persistent poverty, as well as a rise in the number of blighted properties and brownfields. Tennessee's Department of Environment and Conservation's (TDEC) database lists over 600 contaminated sites located within Memphis.

Comprised of nine neighborhoods, the Uptown District is made up of roughly 7,500 parcels, many of which are vacant or underdeveloped. Much of Uptown is characterized as a slow or sluggish market – with little investment or developer interest. The Uptown neighborhoods are characterized by pre-WWII single family homes often in poor condition, defunct commercial corridors, and a long history of environmental contamination released from industrial sites along the Mississippi River, spread through flood waters and/or stormwater runoff. In 2019, The City of Memphis and Shelby County Redevelopment Agency (CRA) conducted a land use hazard screening which identified over 100 parcels in Uptown/north Memphis that have had some history of industrial or heavy commercial use. Brownfield concerns in the Uptown District include proximity to industrial areas and commercial corridors with vacant lots and historic uses such as dry cleaners, gas stations, and auto part salvage yards. CRA is seeking \$765,000 in grant funds from the US Environmental Protection Agency (EPA) to address contamination at a key site. Receipt of this grant will spur its potential as a catalyst for redevelopment at the nexus of four Uptown neighborhoods. CRA has identified a developer, however, a prerequisite to the deal includes a requirement for the property to be remediated and enrolled in the TDEC voluntary cleanup program. Without the EPA cleanup grant, the proposed redevelopment will not occur given the environmental uncertainties of the Site.

b. Description of the Proposed Brownfield Site(s): The targeted brownfield for the proposed cleanup is the former Ibrahim Site (Site), a 3.3-acre property comprised of three adjoining lots: 0 Danny Thomas Way, and 544 and 645 Jackson Avenue. The property was residential as early as 1897 and portions remained that way until 1960 when the eastern lot was developed as a grocery store. The southwest corner of the Site was developed earlier as a retail gasoline station before 1932 and operated for at least 60 years until the early 1990s. By 1953, additional operations at the southwest portion of the Site included a laundry and dry cleaner with the associated buildings razed in 2008. The only building currently on the Site is the 25,900 SF former grocery store, vacant since 2003. The rest of the Site includes a parking lot and a vacant, grass-covered area. The Site is bordered on three sides by urban arterial roads – Jackson Avenue, North Parkway and Danny Thomas Blvd. - a main entry to the St. Jude Children's Research Hospital 80-acre complex (ST. JUDE) to the southwest.

## US EPA FY26 Brownfield Cleanup Grant City of Memphis and Shelby County CRA

Several Phase I, Phase II, and interim remedial actions have occurred at the Site. Environmental concerns are associated with former site uses. The gasoline USTs from the former service station located on the southwest corner of the Site were removed in 1992. Thereafter, approximately 600 cubic yards of impacted soil was removed and groundwater monitoring confirmed that concentrations attenuated to below site-specific criteria. A closure determination for the USTs was issued by TDEC in 1997.

Following the 2008 demolition of the retail building whose historic use included a dry cleaning operations, several potential sources of contamination were identified, as follows:

- A vertical tetrachloroethylene (PCE) UST was found. The vessel and 37 cubic yards of surrounding soil were reportedly removed.
- A Stoddard solvent UST was found. The vessel and 100 cubic yards of surrounding soil were reportedly removed.
- A buried 55-gallon drum of kerosene and motor oil was found. The container and 20 cubic yards of surrounding soil were reportedly removed.
- Buried product lines and two 4 ft by 4 ft by 3 ft concrete boxes (one containing contaminated soil) were also reportedly found and removed. No further information was available in the historical reports.
- A manhole not associated with the city sewer system was found. The structure and 126 cubic yards of surrounding soil were reportedly removed and disposed as hazardous waste. Post excavation soil samples identified residual concentrations of PCE.

Thereafter, a series of groundwater monitoring wells were installed at the site. Historically, four wells evidenced impacts. All four contained chlorinated solvents and two additionally contained benzene and naphthalene, indicating that despite the prior interim remedial measures there are still impacts at the site from the former operations. Of particular concern is the area at the south-central portion of the site: PCE concentrations in MW-4 increased between 2016 and 2018 when the last sample was collected. The 2018 PCE concentration of 127,000 ppb currently exceeds USEPA Regional Screening Levels and Maximum Contaminant Levels.

In 2019, a limited soil gas survey was conducted. One sample, SG06, which was collected on-site near MW-4 exhibited concentrations of PCE (240,000 ug/m<sup>3</sup>) and TCE (420 ug/m<sup>3</sup>), in excess of their respective Commercial Vapor Intrusion Screening Levels.

### **Revitalization of the Target Area**

c. Reuse Strategy and Alignment with Revitalization Plans: The CRA intends to leverage its resources in Uptown to get its neighborhoods growing once again. In May 2025, the CRA issued an RFP for a developer for the Site. As a result, JELCO is the designated developer with whom the CRA is partnering for redevelopment. JELCO's redevelopment project proposes mixed-use residential development with multi-story residential units over ground floor commercial, a grocery store, and a parking garage. This redevelopment not only aligns but also advances the various plans and community goals for the Uptown District. Our biggest tool is the Uptown Tax Increment Financing (TIF) district formed in 2001 and guided by our Uptown Community Plan which provides us with the ability to directly assist a developer and/or invest in a site that that will improve the quality of life of current residents and businesses while drawing in new market participants. The community identified the Ibrahim Site as Priority #1 in the Uptown Community Plan for the overall goal to support adaptive reuse projects and lay the groundwork for a pipeline of larger projects. The revitalization plan is also aligned with the City's comprehensive Memphis

## US EPA FY26 Brownfield Cleanup Grant City of Memphis and Shelby County CRA

3.0 Plan, officially adopted in December 2019 and formulated over two years with the input of nearly 200 public meetings and 15,000 citizens. CRA and our partners are aggressively acting upon Memphis 3.0's call to action to *Build Up, Not Out!* The plan calls for using "anchors," such as the proposed JELCO development, throughout the city in which to focus investment to create more density, providing the greatest return for the community.

d. Outcomes and Benefits of Reuse Strategy: The JELCO proposed concept has been designed to support the needs of the adjacent *non-profit* ST. JUDE. ST. JUDE addresses worker housing through partnerships with local apartment communities to accommodate its expanding workforce. As of 2026, ST. JUDE is in the midst of a multi-billion dollar strategic plan that includes hiring 1,400 additional staff. JELCO will bring on line 162,700 SF of new residential space in 249 mixed income apartments on the Site; 44% of units will be at 80% AMI for workforce housing and the other 56% of the new units designed as market rate to attract ST JUDE health and other professionals, maximizing income diversity and long-term site sustainability in a public/private/non-profit partnership. The project will create a new 360-space parking garage. This project will leverage the ST JUDE expansion as it will not only provide parking for the new residents, but also will assist with meeting increased parking demands associated with the growth of the medical complex across the street.

JELCO development plan also includes 20,000 to 30,000 SF of market rate retail/commercial including a new modern, grocery store. Community input from neighborhood residents strongly supports the establishment of a store at this location, as there are no grocery stores in the Uptown District. Memphis overall is referred to as the "hunger capital of the US" because of the scarcity of grocery stores and supermarkets,<sup>1</sup> and there are both health and economic effects for residents. Establishment of a new store selling a full selection of groceries would not only offer better nutrition to the target area's 5,000 households but also provide money and time savings to families who currently have to travel 20-30 minutes to a supermarket. This is particularly true for the 20% of target area households that do not own a car and may have to choose between the unhealthy options available at a local corner store or using Memphis' limited public transportation to travel to a supermarket.

As the project will likely receive TIF funds, there will be requirements to follow the local utility's EcoBuild standards. These standards require a higher level of energy efficiency, use of native landscaping, improved insulation, and recycled materials, typically using 30% less energy. Moreover, according the Memphis Metropolitan Area's Mid-South Climate Action Plan (2024), use of such weatherization elements such as the improved insulation materials "will decrease the likelihood of harm from extreme weather, such as extreme heat or cold," as it will increase the amount of people who can remain safely in their homes during such extreme weather events.

### Strategy for Leveraging Resources

e. Resources Needed for Site Characterization: Despite decades of prior assessment work, there is no soil delineation data for the areas where soil removal and disposal occurred, nor comprehensive soil vapor survey data for the entirety of the Site. The CRA has used its existing USEPA Assessment grant funds to undertake these activities. This work is going to be completed by June 15, 2026. No other assessment work is needed.

f. Resources Needed for Site Remediation: Having completed over three decades of piecemeal interim remediation measures (UST removals, drum and solvent tank removals) that have addressed some of the source material, the EPA funding will leverage prior and future sources

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<sup>1</sup><https://www.commercialappeal.com/story/news/2019/11/22/guardian-documentary-shows-food-deserts-memphis/4260962002/>

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from the CRA and others. The EPA funding requested in this application will be sufficient to complete the planned remediation needed to the site’s redevelopment.

g. Resources Needed for Site Reuse: The developer with whom the CRA is working, JELCO, has committed over \$43 million for redeveloping the site.

<b>Name of Resource</b>	<b>Resource for Assessment (1.e), Remediation (1.f.), or Reuse Activities (1.g.)</b>	<b>Is the Resource Secured or Unsecured?</b>	<b>Additional Details or Information About the Resource</b>
USEPA Assessment Grant	1.e	Secured	\$127,000 of the CRA’s current assessment grant is encumbered for the soil delineation and vapor surveys
EnSafe Prior Work	1.e, 1.f	Secured	\$312,1056 historic expenditures for EnSafe for prior assessment, demolition support and interim removal of some sources of contamination
CRA Uptown TIF Allocation	1.g	Unsecured	\$1,500,000 from the Uptown TIF District for is available for affordable housing and infrastructure improvements. TIF contributions have yet to be negotiated with the developer.
Developer Provided	1.f, 1.g	Secured	\$10.6 million in equity and \$32.5 million in debt assumed by the developer for redevelopment activities including soil vapor barriers required for remediation

h. Use of Existing Infrastructure: The target Site will reuse existing infrastructure, specifically roadways, as it is surrounded on three sides with existing major throughfares. In fact, the Site is comprised of a portion of a reconfigured and more efficient intersection upgraded in 2008. That being said, due to historic lack of investment, some infrastructure requires improvement. Fortunately, because the Site is within the Uptown District, as noted above \$1,500,000 of TIF allocations can be allocated for infrastructure improvements.

**(2) COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**Community Need**

a. Community’s Need for Funding: As presented in Section 1.a., Memphis has a high percentage of contaminated sites, and its tax base provides little to no ability to self-fund the necessary remediation once assessment has been completed: the city’s poverty makes allocating sufficient funds for environmental remediation nearly impossible. The city ranks first nationally in both overall and child poverty among large metro areas.<sup>2</sup> According to the most recent US Census data, 14.5% of families with children live in poverty in Memphis – over double the national rate (6.2%).<sup>3</sup> The overall poverty rate in the city is almost twice the national average, and it is even higher in the target area, as is unemployment and the proportion of residents without a high school diploma. Over twice as many people in the target area live in deep poverty as the national average (14.5% compared to 5.9% in the US). Additionally, four times as many children in households headed by single females live in poverty as the national average (14.5% compared to 3.7%).<sup>4</sup> A fifth of households do not own a car, and a high percentage of families rent their homes – and are overburdened with rent and utility costs.<sup>5</sup> In the city overall, high levels of poverty create a large demand for services that is not commensurate with Memphis’ available financial resources.

<sup>2</sup> Memphis 3.0: In 2014, Memphis ranked first in overall poverty rate (20.3%) and child poverty rate (30.8%) among the 52 Metropolitan Statistical Areas with populations greater than one million. See Elena Delavega, “2015 Memphis Poverty Fact Sheet” (pdf), data from the American Community Survey.

<sup>3</sup> US Census American Community Survey 5-year estimates, 2019-2023

<sup>4</sup> US Census 5-year ACS 2019-2023

<sup>5</sup> Housing-cost burdened households spend over 30% of their income on housing expenses (rent/mortgage, utilities, etc.).

## US EPA FY26 Brownfield Cleanup Grant City of Memphis and Shelby County CRA

Indicator	Target Site	Memphis	United States
Children (0-18)	22.2%	22.9%	20.8%
Adults over 65	15.2%	16.0%	16.8%
Unemployment rate	7.6%	6.5%	4.3%
Median Household Income	\$38,647	\$55,143	\$81,624
Household income below \$25,000/yr	37.3%	23.8%	14.2%
Per Capita Income	\$23,825	\$34,106	\$45,360
Poverty rate – All individuals	27.7%	22.5%	12.4%
Individuals in deep poverty*	14.5%	11.1%	5.9%
Poverty Rate – Families with children	14.5%	13.8%	6.2%
Poverty Rate – Single-mother households with children	14.5%	10.5%	3.7%
Individuals 65+ in poverty	5.7%	2.3%	1.7%
Population 25+ without HS diploma	20.2%	12.6%	10.6%
Violent Crime Index	828	538	100
Housing units built before 1960	37.2%	35.7%	26.1%
Renter-occupied housing units	77.5%	55.8%	36.9%
Housing-cost burdened**	52.7%	51.0%	46.9%
Owner-occupied housing units	22.5%	44.2%	63.1%
Households without a car	20.0%	10.3%	8.3%
Households with SNAP benefits	25.1%	20.4%	11.8%

\* Deep poverty is defined by the Census as earning less than half of the federal poverty level.

\*\* Housing-cost burdened households spend over 30% of their income on housing expenses (rent/mortgage, utilities, etc.).

Sources: 2019-2023 ACS Estimates, ArcGIS ESRI Business Analyst, Headwaters Economics

b. Health or Welfare of Sensitive Populations: The target site and its adjacent census tracts (113, 20, 21, and 24) have about the same proportion of children and of children under age five as the US average; the main difference is that so many more of these children live in poverty, putting them at greater risk from environmental hazards. Nearly a quarter of households with children rely on SNAP benefits, but the lack of local supermarkets or grocery stores makes it difficult for families to use those benefits to buy nutritious food. Adults with a disability make up another particularly sensitive population. Not only are rates of disability in the target area 5.7 percentage points higher than the national average (18.7% vs 13%), almost 60% of people with a disability in the target area live in poverty.<sup>6</sup> A third sensitive population is residents with chronic respiratory conditions: in the target area, 11.8% of adults have Chronic Obstructive Pulmonary Disease (almost twice the national average), and 13.6% of adults have asthma (compared to 9.9% in the US).<sup>7</sup> No data is available on children who have been diagnosed with asthma. Those with compromised respiratory conditions would be further impacted by potential vapor intrusion of the chlorinated solvent contamination at the site. By using this grant to remediate the Site, a potential source of vapor intrusion in future commercial and residential units alike will be eliminated thus reducing residents' and shopper's overall pollutant load. This grant will help to eliminate the blight that suppresses the quality of life of surrounding residents as well as clear the path for development of new housing and a neighborhood grocery anchor for supplying nutritious foods.

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions: Many of the adverse health conditions that are prevalent in the target area are tied either directly or indirectly to nutrition and food access challenges. For example, in the target area:

- The diabetes rate in adults is extremely high at 22%, compared to 10% in the US.
- 8.4% of adults have coronary heart disease, compared to 6.8% of US residents.
- 49.8% of residents have high blood pressure (vs. 32.7% in the US).

<sup>6</sup> US ACS 2019-2023

<sup>7</sup> Shelby County Health Department

**US EPA FY26 Brownfield Cleanup Grant City of Memphis and Shelby County CRA**

- 49% of adults are obese – far higher than the US average of 33.3%.
- In 2022, 6.3% of adults reported that they had experienced a stroke at some point in the past (compared to 3.6% of US adults).

According to the CDC, poor nutrition increases the risk of chronic conditions like obesity, depression, type 2 diabetes, heart disease, high blood pressure (and in turn stroke risk) and some cancers—which can lead to disability and premature death. While cleanup of the target site removes neighborhood blight and environmental contamination, redevelopment of the site as a new grocery store will help address resident challenges in obtaining nutritious fresh food, with the anticipated outcome of improving adverse health conditions.

d. Economically Impoverished/Disproportionately Impacted Populations: The Target Site census tracts are Historically Disadvantaged Communities and Areas of Persistent Poverty, according to the US DOT/FTA mapping tool.<sup>8</sup> A recent study found that 68 percent of Memphis’ population lives in economic distress, as measured by indices of educational attainment, unemployment, median income, vacant houses, and shuttered businesses. Despite local demand for new development (particularly of a grocery store) and strong desire to address a blighting property, the uncertainty of managing site remediation makes this site not feasible for a private developer. Provision of a grant and expertise to complete the cleanup will immediately address solvent-contaminated soil and soil vapor impacts and improve the budget calculus for developers.

**Community Engagement**

e. Project Involvement & f. Project Roles: As part of implementing the CRA’s 2023 EPA Coalition Assessment grant, a robust stakeholder group consisting of key nonprofits, government representatives, developers, businesses and community liaisons and neighbors have become a proactive team that has identified and prioritized over 570 brownfields and initiated Phase I/II assessments for 23 sites in two years. This Brownfield Coalition Advisory Council will continue to meet quarterly and in addition to their assessment grant objectives, the cleanup and redevelopment of the Ibrahim Site will be a prominent item on their agenda to allow for communication and feedback as the project progresses. CRA will continue to incorporate its well-established Uptown Community Advisory Committee that provides input on implementation of the TIF and Uptown Community Plan throughout this process. A subset of the Brownfield Coalition Advisory Council will serve as a Steering Committee who will guide the implementation of the Cleanup grant. This group will include the following:

Entity Name	Function/Mission	Contact	Involvement / Role
Uptown Community Association	Neighborhood Association	Tanja Mitchell 901-949-1309 <a href="mailto:uptowncoordinator@gmail.com">uptowncoordinator@gmail.com</a>	Community advocacy platform for the Uptown neighborhood, hosts monthly community meeting for stakeholders in the targeted area.
The Works, Inc	Non-profit CDC in several target areas for affordable housing, social services, community revitalization	Mike Larrivee 901-383-3549 <a href="mailto:mike@theworkscdc.org">mike@theworkscdc.org</a>	Chairs, convenes, and facilitates Memphis Brownfield Coalition meetings; has extensive community network
St. Jude/ALSAC	Children’s Research Hospital	Kelly Rayne 901-578-2102 <a href="mailto:Kelly.rayne@alsac.stjude.org">Kelly.rayne@alsac.stjude.org</a>	Adjacent landowner and stakeholder in Uptown District community plan.
Downtown Memphis Commission	Quasi-Governmental agency for Downtown Memphis	Brett Roler 901-575-0574 <a href="mailto:roler@downtownmemphis.com">roler@downtownmemphis.com</a>	Supports investments in Downtown’s development, infrastructure, and vibrancy; the site is adjacent to Downtown

<sup>8</sup> <https://usdot.maps.arcgis.com/apps/dashboards/75febe4d9e6345ddb2c3ab42a4aae85f>

**US EPA FY26 Brownfield Cleanup Grant City of Memphis and Shelby County CRA**

<b>Entity Name</b>	<b>Function/Mission</b>	<b>Contact</b>	<b>Involvement / Role</b>
MMDC	Community Development Organization	Rhonda Brown 901-461-6375 <a href="mailto:rbrown@mdcollaborative.org">rbrown@mdcollaborative.org</a>	Supports community and economic development in the Memphis Medical District where this site is located
JELCO	Developer	James Little <a href="mailto:jel@jel-co.com">jel@jel-co.com</a> 901-604-1994	Future developer of site
Memphis Moves	Chamber of Commerce	Donnell Word 901-543-3500 <a href="mailto:dword@memphischamber.com">dword@memphischamber.com</a>	Represents business interests in the City

g. Incorporating Community Input: Meetings to engage the Uptown neighborhood in brownfield selection and reuse planning have been taking place since 2023 and will continue throughout the proposed project. The CRA’s Brownfield Coalition Advisory Council partners will continue to assist in implementing a grassroots approach to engage the neighborhood in understanding the cleanup and solicit input as the redevelopment unfolds. The developer and CRA will continue to provide updates on the redevelopment project via the Uptown Community Advisory Committee which meets monthly. These meetings are open to the public and the Uptown community liaison will represent and engage the area in which they reside. These meetings are used to solicit feedback and input on the redevelopment projects being undertaken in the Uptown District. Translation services will be provided upon request. All environmental reports, plans for remediation, and redevelopment plans are posted online on the CRA website in the project document repository along with an email where people can reach out remotely to provide input and ask questions.

**(3) TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

**a. Proposed Cleanup Plan:** Remediation is necessary to address soil contamination in the vicinity of MW-4 which is believed to be a continuing source of contamination to groundwater. Estimated at \$765,000, the proposed cleanup plan calls for removal and off-site disposal of impacted soil per the state TDEC remediation requirements. MW-4 will be properly removed prior to soil excavations. Given the shallow nature of groundwater, shoring and dewatering activities will be necessary as part of the excavation activities. This remedy will prevent future exposure to areas with chlorinated solvent contamination in soil and groundwater. All work can be completed within a three-year performance period. Further details of the remediation plan include:

- Approximately 1,067 tons of non-hazardous impacted soil will be removed from an area measuring 80 feet long, 30 feet wide, and extending to 8 feet below grade (fbg) and disposed of off-site. The excavation is anticipated to reach 4 feet below the shallow water table.
- A shoring plan that is protective of the adjacent roadway will be developed by a TN-licensed Professional Engineer and installed by a qualified contractor.
- Excavated soils will be sampled and characterized in accordance with the requirements of the designated disposal facility. Post-excavation sampling and analysis will also be conducted.
- An estimated 40,000 gallons of groundwater that is impacted by dissolved chlorinated solvents will be removed and disposed of off-site as part of excavation dewatering.
- Emplacement of 1,000 tons of clean backfill will be imported. An additional 67 tons of topsoil will be spread and seeded to prevent erosion.
- A replacement monitoring well MW-4 will be installed after backfilling and four monitoring wells will be sampled and analyzed. If groundwater in the area remains impacted, it will be sampled on a quarterly basis for two years to ensure concentrations are decreasing.

**US EPA FY26 Brownfield Cleanup Grant City of Memphis and Shelby County CRA**

**Description of Tasks / Activities and Outputs**

<b>Task 1: Program Management and Community Outreach</b>	
b. Project Implementation: The CRA will oversee implementation of the cooperative agreement. All activities for this task will be EPA funded and include: fees associated with the state Brownfields Voluntary Cleanup Oversight and Assistance Program (VOAP); CRA’s project management, procurement efforts, attendance at an EPA Brownfield Conference, and coordinating with EPA and TDEC. The CRA Project Manager will also facilitate the community engagement effort and the public document repository. A grant management consulting firm will be procured to perform grant budget tracking, compliance, and reporting activities as well as have a qualified environmental professional (QEP) support the community outreach.	
c. Anticipated Project Schedule: Duration of the Cooperative Agreement Performance Period	
d. Task/Activity Lead: CRA Project Manager with assistance of a procured grant manager and QEP.	
e. Outputs: Final ABCA; ACRES reports; Financial Reports; Community Meeting Minutes; Conferences	
<b>Task 2: QEP Professional Services</b>	
b. Project Implementation: All activities for this task will be EPA funded and include amending the existing project QAPP, preparation of the Remedial Action Workplan, construction bid specification preparation, oversight of remediation including Davis Bacon Act/BABA compliance, conducting post excavation sampling and analysis, and preparation of the final report.	
c. Anticipated Project Schedule: Duration of the Cooperative Agreement Performance Period	
d. Task/Activity Lead(s): CRA Project Manager overseeing QEP.	
e. Outputs: Bid specification, QAPP amendment, Remedial Action Workplan, sample data and final report.	
<b>Task 3: Remediation</b>	
b. Project Implementation: All activities for this task will be EPA funded and include remediation contractor general conditions, site preparation, site survey, fencing, proper closure of MW-4, shoring and dewatering, contaminated soil excavation, segregation, stockpiling, and disposal, and backfill/site restoration activities.	
c. Anticipated Project Schedule: Years 1-2	
d. Task/Activity Lead(s): CRA Project Manager overseeing remediation contractor.	
<b>Task 4: Groundwater Monitoring</b>	
b. Project Implementation: All activities for this task will be EPA funded and include the post soil remediation installation of replacement MW-4, collection/storage/disposal of Investigative Derived Waste (IDW), monitoring well sampling and analysis and reporting for estimated eight quarters.	
c. Anticipated Project Schedule: Year 2-3	
d. Task/Activity Lead(s): CRA Project Manager overseeing QEP.	
e. Outputs: Amount of IDW disposed, number of sampling events conducted and groundwater data.	

**f. Cost Estimates:**

<b>Task 1 Program Management and Community Outreach:</b>	
Personnel: CRA PM 20 hrs / month for 3 years est. 720 hours @\$45.46/hour	\$32,731
Fringe: CRA PM 15% of Personnel Costs	\$4,910
Contractual: Grant Management Consultant 3 years est. @\$7,000/year	\$21,000
Contractual: QEP Community Outreach (lump sum)	\$1,500
Travel: Two CRA staff to attend an EPA conference airfare, lodging, and other travel costs est \$1,800/ person	\$3,600
Other: TDEC VOAP Fees (3 years @ \$4,000/year)	<u>\$12,000</u>
<i>Task 1 Subtotal</i>	<u>\$75,741</u>
<b>Task 2 QEP Professional Services:</b>	
Contractual: Bid Preparation (lump sum)	\$15,000
Contractual: QAPP Amendment Preparation (lump sum)	\$3,000
Contractual: Construction Management (48 days est. @\$1,200/day)	\$57,600
Contractual: Post Excavation Sampling (est 20 samples @ \$250/sample)	\$5,000
Contractual: Reporting (RAW, RAR, etc.) (lump sum)	<u>\$65,027</u>

**US EPA FY26 Brownfield Cleanup Grant City of Memphis and Shelby County CRA**

	<i>Task 2 Subtotal</i>	\$145,627
<b>Task 3 Contractor Remediation:</b>		
Construction: General Conditions (lump sum)		\$17,000
Construction: Soil Erosion and other Permitting (lump sum)		\$7,500
Construction: Site topographic and boundary surveys (lump sum)		\$2,500
Construction: Site Preparation / closure of MW-4 (lump sum)		\$25,250
Construction: Construction Fencing (lump sum)		\$28,000
Construction: Shoring Design / Installation (lump sum)		\$35,000
Construction: Dewatering (lump sum)		\$12,500
Construction: Impacted groundwater disposal (est 40,000 gallons @1.50/gal)		\$60,000
Construction: Waste Classification (est 2 samples @\$1,500/sample)		\$3,000
Construction: Excavation / Segregation/ Stockpiling soil (est. 1,067 tons @\$10/ton)		\$10,670
Construction: Loading/Transport/Disposal of soil (est 1,067 tons @\$120/ton)		\$128,040
Construction: Clean fill emplacement and grading (est 1,000 tons @\$90/ton)		\$90,000
Construction: Topsoil emplacement, grading, site restoration (est 67 tons @\$50/ton)		\$3,350
Construction: Contingency (15% of Construction Costs)		<u>\$63,422</u>
	<i>Task 3 Subtotal</i>	\$486,232
<b>Task 4 Groundwater Monitoring:</b>		
Contractual: Installation of MW-4 Replacement (lump sum)		\$5,000
Contractual: IDW storage / disposal (est.8 quarters @\$350/quarter)		\$2,800
Contractual: MW Sampling (est 8 quarters \$2,500/quarter)		\$20,000
Contractual: GW sample analysis (estimated 8 quarters @ \$1,200/quarter)		\$9,600
Contractual: Reporting (est 8 quarters @\$2,500 / quarter)		<u>\$20,000</u>
	<i>Task 4 Subtotal</i>	\$57,400

Some figures have been rounded. Unit costs used are based on actual costs for similar projects.

Budget Categories	Project Tasks				
	Task 1 Program Management & Outreach	Task 2 QEP Services	Task 3 Remediation	Task 4 Groundwater Monitoring	Total
Personnel	\$32,731				\$32,731
Fringe Benefits	\$4,910				\$4,910
Travel	\$3,600				\$3,600
Equipment					\$0
Supplies					\$0
Contractual	\$22,500	\$145,627		\$57,400	\$225,527
Construction			\$486,232		\$486,232
Other	\$12,000				\$12,000
Total Direct	\$75,741	\$145,627	\$486,232	\$57,400	\$765,000
Total Indirect	\$0	\$0	\$0	\$0	\$0
<b>BUDGET TOTAL</b>	<b>\$75,741</b>	<b>\$145,627</b>	<b>\$486,232</b>	<b>\$57,400</b>	<b>\$765,000</b>

**g. Plan to Measure and Evaluate Environmental Progress and Results:** We will track, measure, and evaluate project performance through quarterly reporting/updates submitted to EPA Project Officer (PO) and in the ACRES database. The outputs anticipated through this grant are listed in each task in the section above (*Description of Tasks / Activities and Outputs*) and will be monitored via documentation from the various contractors and consultants. The outcomes associated with the project include: construction jobs, number of community meetings, acres remediated. The EPA PO will be kept abreast of site progress via quarterly meetings with particular focus on the grant workplan schedule.

**US EPA FY26 Brownfield Cleanup Grant City of Memphis and Shelby County CRA**

**(4) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**Programmatic Capability**

a. and b. Organizational Structure and Description of Key Staff: CRA is the primary economic development entity for the City, focusing on the implementation of redevelopment projects. They possess the in-house capacity to oversee the community outreach, coordinate with the environmental regulators, and redevelopers for brownfield development efforts. Vivian Ekstrom holds an MS in City and Regional Planning and will serve as the Program Director. Emma Turri will serve as Program Manager, handling the day-to-day efforts to implement the grant. In the last year alone, they have managed more than 23 environmental assessments for the implementation of the USEPA Coalition Assessment grant. Ms. Lobelia Cole-Smith, Chief Financial Officer, will be responsible for finance functions, and will ensure compliance of grant financial requirements. She has over 25 years of experience managing grant funds including EPA and HUD funding.

c. Acquiring Additional Resources: CRA, as a local unit of government, already has a procurement system in place to contract for professional services as well as contractor services. Following local and federal procurement requirements, CRA will procure any additional outside resources needed to implement the grant. The CRA will procure an experienced grant management consultant and a QEP, as well as a remediation contractor as described in Section 3 above, through a competitive process in conformance with local and federal procurement requirements.

**Past Performance and Accomplishments**

d. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments: CRA has maintained up to date ACRES reporting, accurately reflecting the outputs and outcomes on all grants. We have one open EPA grant:

<b>Grant</b>	<b>Funds Remaining</b>	<b>Outputs/Outcomes Funded to Date</b>
Coalition Assessment Grant 4B 02D64223 07/01/2023- 9/30/2027	\$786,759.99	Quarterly Advisory Council Meetings (10); Monthly Coalition meetings (15); 41% of grant encumbered/spent: 11 Phase Is completed; 5 in process; 7 Phase IIs in process; Programmatic QAPP approved; CIP completed; Brownfield educational curriculum module for local schools completed and available.

(2) Compliance with Grant Requirements: The CRA has been successful with initiating and managing our EPA grant since its 2023 award. We are meeting progress goals per the grant workplan and submitting required grant deliverables. This includes quarterly reports, federal financial reports, and ACRES reporting. To date there have been no delays encountered on grant project milestones. We continue to meet with our EPA PO on a quarterly basis to keep her abreast of our progress and any areas of concern. We anticipate fully expending our assessment grant fund prior to the 9/30/2027 performance period end date.



The City of Memphis and Shelby County Redevelopment Agency  
Former Ibrahim Site  
EPA FY26 Brownfield Cleanup Grant Proposal  
Threshold Documentation

**US EPA FY25 Brownfield Cleanup Grant  
City of Memphis and Shelby County CRA Former Ibrahim Site  
Threshold Criteria**

**THRESHOLD CRITERIA**

**1. Applicant Eligibility:**

- a. The City of Memphis and Shelby County community Redevelopment Agency (CRA) was created by State legislation to serve as a quasi-governmental local organization and, as such, is an eligible applicant. A joint ordinance from the City of Memphis and Shelby County establishing and setting out CRA duties, dated May 16, 2000, may be viewed in **Attachment 1**.
- b. The CRA is NOT a 501( C) 4.

**2. Previously Awarded Cleanup Grants:**

No EPA Brownfields Cleanup Grant funds have previously been awarded for the targeted site.

**3. Expenditure of Existing Multipurpose Grant Funds**

The CRA does not have any open Multipurpose Grants.

**4. Site Ownership Information:**

The CRA is the current owner of the site.

**5. Basic site information:**

- a) The former Ibrahim Site. The site is also known as the Former Ibrahim “Chism Trail” Site
- b) 544 and 645 Jackson Avenue and 0 Danny Thomas Blvd, Memphis, TN 38105

**6. Status and History of Contamination at the Site:**

- a) Type of Contamination: The site is contaminated by hazardous substances.
- b) Operational History/Current Uses: The property was residential as early as 1897 and portions remained that way until 1960 when the eastern lot was developed as a grocery store. The southwest corner of the Site was developed earlier as a retail gasoline station before 1932 and operated for at least 60 years until the early 1990s. By 1953, additional operations at the southwest portion of the Site included a laundry and dry cleaner with the associated buildings razed in 2008. The only building currently on the Site is the 25,900 SF former grocery store, vacant since 2003. The rest of the Site includes a parking lot and a vacant, grass-covered area.
- c) Environmental Concerns: Soil and groundwater contamination exist at the site.
- d) Causation, Nature, and Extent of Contamination: Environmental concerns are associated with former site uses. The gasoline USTs from the former service station located in the southwest corner of the Site were removed in 1992. Thereafter, approximately 600 cubic yards of impacted soil was removed and groundwater monitoring confirmed that concentrations attenuated to below site-specific criteria. A closure determination for the USTs was issued by TDEC in 1997.

**US EPA FY25 Brownfield Cleanup Grant  
City of Memphis and Shelby County CRA Former Ibrahim Site  
Threshold Criteria**

Following the 2008 demolition of the retail building whose historic use included a dry cleaning operations, several potential sources of contamination were identified, as follows:

- A vertical tetrachloroethylene (PCE) UST was found. The vessel and 37 cubic yards of surrounding soil were reportedly removed.
- A Stoddard solvent UST was found. The vessel and 100 cubic yards of surrounding soil were reportedly removed.
- A buried 55-gallon drum of kerosene and motor oil was found. The container and 20 cubic yards of surrounding soil were reportedly removed.
- Buried product lines and two 4 ft by 4 ft by 3 ft concrete boxes (one containing contaminated soil) were also reportedly found and removed. No further information was available in the historical reports.
- A manhole not associated with the city sewer system was found. The structure and 126 cubic yards of surrounding soil were reportedly removed and disposed as hazardous waste. Post excavation soil samples identified residual concentrations of PCE.

Thereafter, a series of groundwater monitoring wells were installed at the site. Historically, four wells evidenced impacts. All four contained chlorinated solvents and two additionally contained benzene and naphthalene, indicating that despite the prior interim remedial measures there are still impacts at the site from the former operations. Of particular concern is the area at the south-central portion of the site: PCE concentrations in MW-4 increased between 2016 and 2018 when the last sample was collected. The 2018 PCE concentration of 127,000 ppb currently exceeds USEPA Regional Screening Levels and Maximum Contaminant Levels.

In 2019, a limited soil gas survey was conducted. One sample, SG06, which was collected on-site near MW-4 exhibited concentrations of PCE (240,000 ug/m<sup>3</sup>) and TCE (420 ug/m<sup>3</sup>), in excess of their respective Commercial Vapor Intrusion Screening Levels.

**7. Brownfields Site Definition:** The targeted site is:

- a) Not listed or proposed for listing on the NPL;
- b) Not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA;
- c) Not subject to the jurisdiction, custody, or control of the U.S. government.

**8. Environmental Assessment Required for Cleanup Grant Applications**

Assessment efforts and interim remediation measures have been ongoing sporadically at the site since the early 1990s. Completed assessments for all / some of the parcels that comprise the targeted site include at least four Phase I environmental assessments and at least two Phase II environmental assessments: one conducted in December 2007 and one conducted in April 2012. In addition,

**US EPA FY25 Brownfield Cleanup Grant  
City of Memphis and Shelby County CRA Former Ibrahim Site  
Threshold Criteria**

several groundwater investigations have taken place at the site over the years. reports.

**9. Site Characterization**

- a) Not applicable, the CRA is not a State or Tribal Environmental Authority
- b) i. Please see **Attachment 2** for the letter from the Tennessee Department of Environment & Conservation (TDEC).  
ii. Additional assessment will be conducted at the site. Despite decades of prior assessment work, there is no soil delineation data for the areas where soil removal and disposal occurred, nor comprehensive soil vapor survey data for the entirety of the Site. The CRA has used its existing USEPA Assessment grant funds to undertake these activities. This work is going to be completed by June 15, 2026.
- c) Not applicable as the target site is enrolled in the State Brownfield Voluntary Cleanup Oversight and Assistance Program.

**10. Enforcement or Other Actions**

There are no known ongoing or anticipated federal environmental enforcement or other actions related to the targeted site.

**11. Sites Requiring a Property-Specific Determination**

The targeted site does not need a property-specific determination.

**12. Threshold Criteria Related to CERCLA/Petroleum Liability**

**a. Property Ownership Eligibility – Hazardous Substances Sites:**

**i. EXEMPTIONS TO CERCLA LIABILITY**

**(3) Property Acquired Under Certain Circumstance by Units of State and Local Government.**

**(a) Circumstances of Property Acquisition:** The prior owner, MLB Uptown, LLC, was a designated developer entity. When their developer designation did not renew, CRA acting in their sovereign capacity, was required to take title via quit claim deed as they act as a receiver in such circumstances under the local redevelopment authority.

**(b) Dates of Property Acquisition:** The site was acquired on 8/14/2019.

**(c) Timing of Disposal of Hazardous Substances:** Disposal of all hazardous substances being addressed by the grant occurred prior to the CRA acquisition.

**(d) Caused or Contributed:** The CRA did not cause or contribute to any release of hazardous substances to the site.

**(e) Arrangement / Transported Hazardous Substances:** The CRA did not at any time arrange for the disposal of hazardous substances at the site, nor transported hazardous substances to the site.

**US EPA FY25 Brownfield Cleanup Grant  
City of Memphis and Shelby County CRA Former Ibrahim Site  
Threshold Criteria**

- ii. **EXCEPTIONS TO MEETING THE REQUIREMENTS FOR ASSERTING AN AFFIRMATIVE DEFENSE TO CERCLA LIABILITY** – Not applicable.
  - iii. **LANDOWNER PROTECTIONS FROM CERCLA LIABILITY** – Not Applicable.
  - iv. **SITES WITH HAZARDOUS BUILDING MATERIAL THAT IS NOT RELEASED INTO THE ENVIRONMENT** – Not applicable as there has been no release of nor threat of release of hazardous substance(s) from the building into the outdoor environment based on the site conditions.
- b. **Property Ownership Eligibility – Petroleum Sites**: Not applicable, the site is contaminated by Hazardous Substances.

**13. Cleanup Authority and Oversight Structure:**

- a. The targeted site is already enrolled in the State response program, the TDEC State Brownfield Voluntary Cleanup Oversight and Assistance Program.
- b. It is not anticipated that access to neighboring properties will be required. However, if it is, the CRA will work with our surrounding neighbors to secure access to the adjacent property.

**14. Community Notification documents:**

- a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA). A Draft ABCA was prepared for the cleanup activities. A Draft ABCA was provided for public review and comment. The ABCA information was presented at a public meeting as well.
- b. Community Notification: Prior to holding a public meeting, a legal notice was run in The Daily News newspaper on January 7, 2026.
- c. Public Meeting: An public meeting was held with both in person and remote participation options on January 13, 2026. The draft application was discussed as well as the draft ABCA.
- d. Community Notification Documents: The Draft ABCA can be found in **Attachment 3**. See **Attachment 4**, proof of Community Notification Ad. See **Attachment 5** for the sign-in sheet and meeting notes from the public meetings.

**15. Contractors and Named Subrecipients**

- a. **Contractors**: No contractors have been selected that will be compensated with EPA funds made available under the FY2026 RFA. Upon notification of award, procurement for EPA funded efforts will be conducted.
- b. **Subrecipients**: Not Applicable.