

**Land Reutilization Authority of the City of St. Louis
St. Louis Development Corporation**



DRAFT Proposal for Site Specific Petroleum Cleanup Grant

**Former Spotless Car Wash
1954-56 Utah Ave, aka 3300 Wisconsin Avenue
St. Louis, Missouri 63118
Submitted November 2011**

Threshold Criteria for Petroleum Cleanup Grant

1. Applicant Eligibility

a. The Land Reutilization Authority of the City of St. Louis (LRA) is a public body corporate and politic organized and existing pursuant to the laws of the State of Missouri, including Sections 92.700-92.920 of the Revised Statutes of Missouri (The Municipal Land Reutilization Law). The City of St. Louis adopted Ordinance No. 56054 on December 1, 1971, enabling LRA to operate within the City of St. Louis. LRA is a political subdivision of the City and the State and was created for the public purpose of acting as the recipient of tax delinquent property it acquires involuntarily through the process of tax foreclosure of tax delinquent properties. LRA is charged with the responsibility of returning this non-revenue generating non-tax producing property to effective utilization for housing, new industry, and jobs for the citizens of the City of St. Louis. St. Louis Development Corporation provides staff and manages the affairs of various governmental agencies including LRA. SLDC is a Missouri non-profit corporation, the purpose of which is to promote economic development in the City of St. Louis (see Exhibit A for Articles of Incorporation and Exhibit B for Bylaws). SLDC's Executive Director and its Chairman are both appointed by the Mayor of the City of St. Louis. The chairman of each related agency (including LRA) and the chairmen of two (2) aldermanic committees comprise the remainder of SLDC's Board. SLDC is eligible as a "redevelopment agency that is chartered or otherwise sanctioned by a State" for purposes of Section 211 of the Small Business Liability Relief and Brownfields Revitalization Act (the Act).

b. Site Ownership: The site was purchased by LRA on March 23,; LRA will maintain ownership until all of the cleanup work funded by the grant has been completed and the grant is closed out.

2. Letter from State Environmental Authority: See Attached Exhibit C.

3. Site Eligibility and Property Ownership Eligibility

a. Basic Site Information: (a) Former Spotless Car Wash Site; (b) 3300 Wisconsin Avenue, St. Louis, MO 63118; (c) Land Reutilization Authority of the City of St. Louis; (d) Not applicable, as LRA has been the owner since March 23, 2011.



b. Status and History of Contamination at the Site: (a) Petroleum contamination; (b) Former use as a gasoline filling station; Current use is none, and the roof of the service station building is partially collapsed; (c) Environmental concerns include 1) multiple underground storage tank systems that have not been properly closed; 2) soil and groundwater contamination above Missouri's Default Target Levels. Contaminants include various petroleum hydrocarbons and lead. (d) Site became contaminated through leaking of underground storage tanks.

c. Sites Ineligible for Funding: The subject property is (a) not listed or proposed for listing on the National Priorities List; (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; and (c) not subject to the jurisdiction, custody, or control of the United States government.

d. Sites Requiring a Property-Specific Designation: The subject property does not require a property-specific determination, as it does not meet the criteria outlined in Appendix 2, Section 2.5, of the Guidelines for Brownfields Cleanup Grants.

e. Environmental Assessment Required for Cleanup Proposals: An ASTM E1527-05 equivalent Phase I Environmental Site Assessment was completed on 02/16/2011. An ASTM E1903-11 equivalent Phase II Environmental Site Assessment was completed on 11/15/2011. Additional investigation is planned to further delineate contamination once the tanks and obviously impacted soil are removed and properly disposed.

f. CERCLA §107 Liability: N/A – Petroleum Site

g. Enforcement Actions: N/A – Petroleum Site

h. Information on Liability and Defenses/Protections: N/A – Petroleum Site

i. Petroleum Sites: An eligibility determination was requested from the Missouri Department of Natural Resources on 11/10/2011, and is attached as Exhibit D. For your information, the determination was requested by SLDC, the umbrella organization which staffs LRA and other economic development-related city agencies. SLDC performed the previously referenced Phase I Environmental Site Assessments with funding provided by Community Development Block Grants (CDBG) and the Phase II ESA is being funded through a Brownfields assessment cooperative agreement (BF-97720801). The subject property will be remediated under the oversight of either the Missouri Department of Natural Resources' Tanks Section or enrolled in Missouri's Brownfields/Voluntary Cleanup Program. All of the information required under Threshold Criteria of the Brownfield Cleanup Grant proposal guidelines has already been submitted to both the MDNR and USEPA.

4. Cleanup Authority and Oversight Structure

a. We plan to apply for enrollment of the subject property in the Missouri Brownfields/Voluntary Cleanup Program when the Brownfields grant recipients are announced.



Cleanup of the site will be overseen by SLDC, who uses a pool of environmental consultants pre-qualified through a qualifications-based selection (QBS) process. The selected consultant will directly manage cleanup through the following tasks: write the cleanup specification for MDNR review and approval, assist the LRA with procuring cleanup bids, provide contract oversight during the term of the cleanup, collect and submit for laboratory analysis cleanup confirmation samples, prepare and submit a site closure report to the MDNR.

b. Based on currently available information, it does not appear as if neighboring properties are threatened by current conditions. However, if conditions warrant, we will obtain access to any potentially affected property through the use of a standard access agreement, with which we are already very familiar.

5. **Cost Share:** The cost share requirement will come in the form of staff salaries, which are budgeted in part from LRA general operating funds, specifically, those funds derived from the sale of land.

6. **Community Notification**

See Attached Exhibits:

- Exhibit F: Affidavit of publication of public meeting notice in the St. Louis Post-Dispatch
- Exhibit G: Flyer sent to community organizations & other individuals
- Exhibit H: Listing on City of St. Louis Public Meeting Calendar
- Exhibit I: Posting of grant application on SLDC's website
- Exhibit J: Matrix of public comments received & response to comments
- Exhibit K: Notes from public meeting
- Exhibit L: Sign in sheet from public meeting
- Exhibit M: Letters of support from Benton Park Neighborhood Association, City of St. Louis Community Development Administration, and other concerned entities.

Ranking Criteria for Petroleum Cleanup Grant

1. **Community Need**

a. **Health, Welfare and Environment**

i) The City of St. Louis is overburdened with abandoned properties. **The City's Land Reutilization Authority (LRA) currently holds title to more than 9,900 parcels, most of which come under agency control through the tax foreclosure process.** This "owner of last resort" system creates a tremendous challenge for the City and its related agencies. There is no way to accurately predict specific properties that will enter the City's inventory in this manner, but the current inventory of sites needing attention speaks volumes to the need.



As an older urban core community that has suffered from rapid population loss and suburban sprawl, St. Louis has an abundance of vacant land -- over 19,726 parcels, accounting for 4,391 acres (representing approximately 14.5% of the land area of the City). Our inventory of known publicly-owned Brownfields currently stands at 110 sites; however, using a conservative estimate of five percent of all vacant land and abandoned buildings, the number of Brownfields in the City could eventually grow as high as 1,200 sites, which present a significant blight on residential neighborhoods and can give even the most livable neighborhoods an air of decline and dilapidation.

The health and environmental impacts from contaminated petroleum sites can be extensive. At the Porter Oil Site, there are multiple underground storage tanks which were used to store thousands of gallons of gasoline. Additionally, there are numerous permanent and portable aboveground storage tanks of various sizes which were used to store kerosene and oil. In These tanks are made of steel, which corrode and leak over time, polluting both soil and groundwater.¹ **In the City of St. Louis, this polluted groundwater eventually makes its way into the Mississippi River, further polluting the river that is the heart of the Midwest.** Contaminants left behind by petroleum include benzene, toluene, and naphthalene, among others. Benzene is a known carcinogen (cancer-causing substance), and the others are possible carcinogens. **St. Louis is ranked 18 among the 115 counties in Missouri for its cancer incidence rate.**² **African-Americans have higher incidence and mortality rates of cancer than all other races.**³ The population of St. Louis is 48.5% African-American, which may explain why cancer rates within the City are above the national average for many types of cancer. Fortunately, the cancer rate disparity among Caucasians and African-Americans is decreasing in the State of Missouri.⁴ Adverse health effects from petroleum contaminants are further detailed below.

Petroleum Substance	Possible Health Hazards⁵
Benzene	anemia, leukemia
Ethyl benzene	dizziness, eyes burning
Naphthalene	anemia, cataracts, lung damage
Toluene	memory loss, nausea
Xylenes	kidney & liver damage
Total Petroleum Hydrocarbons	nerve disorder
Ethylene Dibromide	lung, liver, & kidney damage

¹ EPA Office of Underground Storage Tanks. www.epa.gov/OUST/overview.htm

² National Cancer Institute State Cancer Profiles. www.statecancerprofiles.cancer.gov/index.html

³ SEER Cancer Statistics Review, 1975-2004, National Cancer Institute. www.seer.cancer.gov/csr/1975_2004/

⁴ Missouri Department of Health and Human Services Cancer Disparity Report. www.dhss.mo.gov/CancerinMissouri/CancerDisparityReport.pdf

⁵ Agency for Toxic Substances and Disease Registry, Department of Health and Human Services. www.astdr.cdc.gov



Cleanup of the Former Spotless Car Wash Site will result in removal of threats to human health and the environment. This Brownfield is characterized by soil and groundwater impacts from leaking tanks and piping; as noted below, the human health hazards of petroleum contamination are both numerous and dangerous. In addition to the aforementioned human health effects, petroleum contaminants can be harmful to non-human organisms. Once benzene enters the groundwater, it cannot readily evaporate or degrade because it is underground. Ethylene dibromide becomes entrapped in topsoil and does not evaporate. Naphthalene bio-accumulates: concentrations increase rapidly in organisms which live in naphthalene-contaminated environments. In the urban atmosphere of the City of St. Louis, toluene helps to form ozone and therefore contributes to air pollution and photochemical smog; xylene also contributes to smog. **The City of St. Louis received grades of “F” from the American Lung Association for both high levels of ozone and particulate pollution.**⁶ According to the same report, in the U.S., **the City is ranked 15th Most Polluted with Ozone and 13th Most Polluted with Year-Round Particle Pollution.** Asthma is a large problem among African-Americans in St. Louis, as noted below in Section 1.a.ii.

By removing contaminated soil and determining that no further groundwater pollution will occur (through groundwater monitoring), the threats to human health and environment can be reduced or eliminated. Ninety-nine percent of the funds will be used to identify and reduce threats to human health and the environment, through contracts for cleanup. Although the specifics of site reuse are unknown at this time, for the most part we endeavor to redevelop former petroleum Brownfields for non-residential uses; whatever the end use may be, we are capable and willing to shepherd this site through extensive cleanup, to ensure human health and the environment are afforded maximum protection.

ii) The health and welfare of the African-American population in the City of St. Louis are drastically worse than that of the Caucasian population. **African-Americans in St. Louis have a mortality rate 30% higher than that of Caucasians.**⁷ The rate of emergency room visits for Caucasians is 233.8 visits per year per 1000 residents; for African-Americans it is 560.8. **The rate of emergency room visits due to asthma is 530% higher for African-Americans than for Caucasians. Twice as many African-American babies have low birth weights.** While not all of these disparities can be attributed solely to environmental issues, it is clear that African-Americans in the City of St. Louis are disproportionately impacted by environmental problems which severely affect their health and standards of living.

The health and welfare of African-American children in St. Louis are also notably poorer than that of Caucasians. Thirty-six percent of African-American children participate in the WIC Program (USDA Special Supplemental Nutrition Program for Women, Infants, and Children), compared to twenty-two percent of Caucasian children. African-American

⁶ American Lung Association State of the Air Report. www.stateoftheair.org/2008

⁷ All data in this section is from Missouri Department of Health and Human Services. www.dhss.mo.gov



children visit the ER for asthma at seven times the rate of Caucasian children. **Additionally, the death rate for African-Americans ages 1-19 is over three times the death rate for Caucasian children.**

Children in the City of St. Louis are also impacted by lead poisoning. In 2005, St. Louis City ranked number one among all counties in Missouri in the percent of children tested who had confirmed cases of lead poisoning.⁸ Lead poisoning is prevalent in St. Louis for multiple reasons. Lead-based paint was banned in 1978, and over 90% of the housing stock in St. Louis was built prior to the ban.⁹ St. Louis also was home to lead smelters and other industries that produced particulates which ended up in the soil.

Also, the poverty rates for children and the elderly in the City of St. Louis are much higher than for the same populations in the US, the State of Missouri, and in St. Louis County. Impoverished residents are much less likely to have health insurance, and are therefore more impacted by environmental problems if they do not have the ability to seek health care for treatment. Statistics demonstrating the welfare of sensitive populations in St. Louis are noted below:

Selected Demographics¹⁰	U.S.	Missouri	St. Louis County	City of St. Louis¹¹
Poverty Rate for Children Under 18	18.0	17.7	12.3	31.8
Poverty Rate for People Over 65	9.5	9.3	6.5	13.9
Percent of Households Receiving Food Stamp Benefits	7.7	10.1	6.4	18.6
Mean Retirement Income	\$20,362	\$17,817	\$20,850	\$13,679
Percent of Households with Single Mothers	7.4	7.6	8.0	19.7

Welfare of residents is also impacted by crime, and to date, the murder rate in the City through October 2008 has already surpassed the murder rate for all of 2007. Certainly the struggling economy has had some causal effect on crime in the City, and unfortunately it will likely only get worse.

b. Financial Need

i) The economic impact of abandoned industrial sites is staggering, as the cost of even the simplest of cleanups can easily outstrip the economic value of a given property. Many times, parcel sizes are too small to attract contemporary redevelopment, necessitating land assembly. EPA cleanup funds will go a long way in restoring the economic value of the

⁸ Department of Health & Human Services, Centers for Disease Control & Prevention., www.cdc.gov/nceh/lead/surv/stats.htm

⁹ US Census Bureau, American Community Survey 2007. www.census.gov/acs/www/index.html

¹⁰ US Census Bureau, American Community Survey 2007. www.census.gov/acs/www/index.html

¹¹ In Missouri, the City of St. Louis is legally an independent county, and demographic statistics are calculated separately from those of St. Louis County.



subject property, be protective of human health within an at-risk population, and clean the environment to a level safe for commercial or industrial use.

The project will benefit the residents of the City of St. Louis, legally viewed as a separate county in Missouri; the City has experienced one of the sharpest population loss and property abandonment phenomena in the United States. **The City as a whole has lost 53% of its population since 1960, whereas adjacent counties have seen their populations increase by up to 34% from 1990 to 2000.** This urban flight has created vast areas of abandoned and underutilized land within the City limits. The City’s Land Reutilization Authority, the owner of last resort in the tax foreclosure process, currently holds title to some 9,900 abandoned and often contaminated parcels. The subject property is one such area.

Whereas the City has had increased economic development in its urban core over the past few years, 2008 has been a year of economic decline across all sectors of the market. Additionally, it is important to note that many impoverished and unemployed St. Louisans live in areas where the market has been suffering not just this year, but for many years – even for decades. Most Brownfields accumulate in areas where the cost of development cannot be justified from the anticipated return; most of these areas are economically depressed. It is in these areas where abandoned Brownfields permeate the neighborhoods and environmental contamination affects the most vulnerable residents – children, elderly, and homeless. According to the National Alliance to End Homelessness, in 2005 the City had an estimated 1,485 homeless people, and it is possible that they are taking residence in abandoned, environmentally unsafe buildings.¹² As noted in the table below, **the City of St. Louis has high unemployment and poverty rates – nearly double the US, Missouri, and St. Louis County averages.**

Selected Demographics¹³	U.S.	Missouri	St. Louis County	City of St. Louis
Population	301,621,159	5,878,415	995,118	350,759
Percent Non-White	26.1	16.1	26.2	52.6
Percent High School Graduate or Higher	84.5	85.6	90.1	79.4
Median Household Income	\$50,740	\$45,114	\$56,771	\$34,191
Poverty Rate	13.0	13.0	8.6	22.4
Unemployment Rate	6.3	6.3	5.9	11.8
Percent Renter-Occupied Housing	32.8	29.3	25.7	49.3
Percent Vacant Housing Units	12.1	12.8	7.8	21.3

ii) The City’s current infrastructure was built for a population more than twice its current population; St. Louis suffered a mass exodus of residents beginning in the 1960s. The City is attempting to keep up roads, sewers, schools, and other public utilities that were built to

¹² “Homelessness Counts,” January 2007; www.endhomelessness.org

¹³ US Census Bureau, American Community Survey 2007. www.census.gov/acs/www/index.html



support a population of over 800,000; with a current population of just over 350,000, the tax base has decreased dramatically. Now the City is struggling generate enough revenue to keep infrastructure maintained. Our government is struggling to provide residents' basic municipal needs and, unfortunately, cleaning up all of the environmentally abandoned sites is impossible given the current economic state. As consumer spending and housing prices decline, and job losses increase, the tax base for the City continues to shrink.

Adding to the difficulty of redeveloping Brownfields is the slumping economy. The current credit crisis is hitting hard in the St. Louis area; development is lagging due to the lack of available credit owing to tightened credit standards. **In 2008, total building permits dropped 45.2% from 2007, compared to a national decrease of 32.1%.**¹⁴ Also, compared with the same period in 2007, year-to-date home sales in July 2008 were down by 16%. Consumer spending is down, as two-thirds of general retailers and 83% of the car dealers surveyed have noted declines in sales from 2007. The St. Louis area lost 11,000 jobs from August 2007 to August 2008. **In February 2008, Macy's Department Stores cut 850 jobs in St. Louis. Multiple auto manufacturing plants closed in 2008, leading to hundreds of layoffs. Additionally, with the impending buyout of Anheuser-Busch Inc. by InBev (a Belgian company), and the bailout of Wachovia Securities by Wells Fargo, 10,800 jobs in St. Louis could be threatened.**

The mortgage crisis has also affect the welfare of residents; **in August 2008, the foreclosure rate in St. Louis City ranked third out of Missouri's 115 counties.**¹⁵

The EPA Brownfield Cleanup and Assessment Grants we were awarded on October 1, 2008 are for environmental site assessments and site-specific cleanups. If additional testing is necessary on the Former Porter Oil Site, we will be able to use funds from the Petroleum Assessment Grant. However, none of our grant funds are eligible to use for cleanup on this site, so this Brownfield Cleanup Grant is necessary to ensure remediation of the site.

2. Project Description & Feasibility of Success

a. Project Description

i) *project description*

The Former Spotless Car Wash Site is comprised of just 0.17 acres, but as many as nine underground tanks may be present. The roof on the onsite building is partially collapsed. With EPA Cleanup Grant funds we plan to take whatever actions are necessary to remove underground storage tanks and grossly contaminated soil.

ii) *cleanup plan, institutional or engineering controls, potential end use*

¹⁴ Current Economic Conditions in the Eighth Federal Reserve District, St. Louis Zone, Prepared by the Center for Regional Economics—8th District, Federal Reserve Bank of St. Louis. www.research.stlouisfed.org/regecon/district.html

¹⁵ www.realtytrac.com



At present, the plan is to clean the property to a level that is safe for its intended use, which is commercial development

b. Budget for EPA Funding and Leveraging Other Resources

i) **Over XX percent of the proposed grant activities are budgeted directly for contractual services related to cleanup.** Budget Categories and Project Tasks are described in detail in the narrative following the chart below:

BUDGET CATEGORIES	Task 1: Cleanup Management	Task 2: Cleanup Contracting	Task 3: Community Outreach	TOTAL
Personnel	5,150	30,800	50	36,000
Fringe Benefits				
Travel	500	500		1,000
Equipment				
Supplies	250		250	500
Contractual	30,000	148,500		178,500
Other (specify)				
Total	35,900	179,800	300	216,000
Cost Share	5,150	30,800	50	36,000

Task 1: Cleanup Management: We anticipate entering into a contractual relationship with one of our pre-qualified environmental consultants, who will be chosen based upon a Qualifications-Based Selection (QBS) process. The selected consultant will directly manage cleanup through the following tasks: write the cleanup specification for MDNR review and approval, assist LRA with producing request for proposals and procuring cleanup bids, provide contract oversight during the term of the cleanup, collect and submit for laboratory analysis cleanup confirmation samples, prepare and submit a site closure report to the MDNR. Contractual costs are based upon our direct experience managing cleanup at other similar sites. The Supplies category will be used to defray copying costs related to producing bidding and contract documents. The Travel category will be used to defray travel costs associated with meetings with MDNR.

Task 2: Cleanup Contracting: We anticipate awarding a cleanup contract to the low responsive bidder for the following activities: removal and proper disposal of up to nine underground tanks and associated piping, excavation, transportation and disposal of up to 500 cubic yards of contaminated soil, backfill excavation with clean granular material. Cost assumptions for estimation purposes are as follows: excavation, \$10/ton; transportation, \$16/ton; disposal, \$15/ton; backfill, \$10/ton. Also factored into the budget is a 20 percent contingency for unanticipated conditions, which is a standard consideration for such work.



The Travel category will be used to defray travel costs associated with meetings with MDNR.

Task 3: Community Outreach: The Community Outreach task will enable staff to effectively communicate the challenges and results of our work under the grant to the affected neighborhoods. We will actively keep the community informed through meeting with the involved community groups and through development and distribution of informational brochures. The \$250 budget represents anticipated hard costs for producing informational handouts and conducting neighborhood-level outreach meetings.

ii) SLDC/LRA currently employs one full-time Certified Hazardous Materials Manager (CHMM) and an Assistant Major Projects manager who together are responsible for environmental contracting and all EPA grants; salary and fringes come from a variety of federal, state, and local sources. Once properties are sold, our development agreements typically prescribe roles and responsibilities with respect to remaining cleanup; SLDC/LRA typically requires that environmental cleanup occurs, resulting in a “No Further Action” letter from the state. When possible, the burden of this expense is placed upon the developer, who often applies for and receives Brownfield Remediation Tax Credits from the Missouri Department of Economic Development. Other resources leveraged to accomplish cleanup goals include: the St. Louis Brownfields Cleanup Fund (capitalized by a 2003 EPA Brownfields Revolving Loan Fund grant), in-kind services provided by EPA and MDNR emergency response personnel when uncontrolled hazardous wastes are discovered, Brownfields Targeted Assessments performed under contract to the MDNR and/or EPA, cleanup of abandoned gas station sites by MDNR using USTfields and ARRA grant funds provided by EPA (nine sites in 2010-2011), and various other cleanup funding sources such as EDA Economic Adjustment Grants (most recently, \$950,000 for demolition and asbestos abatement at former St. Louis Army Ammunition Plant), HUD Community Development Block Grants, and SLDC Corporate Funds. The specifics of each site are unique, and staff works diligently to identify and fill any funding gaps that emerge through the process.

Another source of support is the Missouri Petroleum Storage Tank Insurance Fund (PSTIF), which is managed by a third-party administrator in conjunction with cleanup standards administered by MDNR; PSTIF funds can be used to clean up contamination left behind once underground storage tanks are removed and after the applicant has satisfied a \$10,000 deductible. The Former Spotless Car Wash site is not eligible for assistance from this program.

Staff stands ready to assemble whatever resources are available to ensure a project’s success. Additionally, MDNR has been extremely helpful in bringing cleanup resources to petroleum sites on our behalf. Between 2002 and 2006, we successfully leveraged \$450,000 of in-kind assessment services at petroleum sites from the MDNR, which were performed on 16 sites.

Another key source of funding is the State of Missouri’s Department of Economic Development (DED), which provides developers with economic incentives to encourage



development of Brownfields. The DED has a Brownfield Redevelopment Program that offers three types of tax credits. After application and acceptance into the Program, developers can receive tax credits for up to 100% of the cost of remediation of the project property. Another credit is the Demolition Tax Credit, where the DED issues tax credits for up to 100% of the cost of non-remediation demolition. Finally, the DED offers Job and Investment Tax Benefits for business locating at the project site. The DED also offers a Historic Preservation Tax Credit, which has been used by many developers in the City. All of these incentives are routinely used with redevelopment of sites within the City. **Since 1999, projects in the City of St. Louis have received over \$91 million in Brownfield Remediation Tax credits and over \$500 million in Historic Preservation Tax Credits from the DED. These projects have projected creation of over 11,000 jobs, and approximately \$2.1 billion of private funds have been leveraged.**¹⁶ These tax credits have been absolutely vital to the redevelopment that has occurred in St. Louis. The Former Porter Oil Site has one building that would qualify for Historic Preservation Tax Credits, and, if combined in a larger development with eight nearby parcels, there are four buildings that may qualify for the credits. Additionally, the site could also qualify for Brownfield Remediation Tax Credits. These credits could provide untold leverage to ensure the financial feasibility of the development of the site.

Finally, the City has a very active Tax Increment Finance (TIF) program, which is managed by the Commercial Development department at SLDC. The City currently has over 120 approved TIF projects which are projected to bring billions of dollars of investment into the City. New developments frequently use TIF as a funding source.

c. Programmatic Capability

i) SLDC has a proven track record of successful federal grants management. We recently successfully closed out the Mississippi River Corridor Brownfields Initiative, a Showcase Communities grant that covered both sides of the Mississippi River and two EPA Regions (5 and 7). Measures of success included developing a regional capacity for Brownfields practitioners; building sustainable federal, state and local Brownfields partnerships; securing the Brownfields 2004 conference for St. Louis and providing a national platform to showcase the region's successes; leveraging over \$12 million for projects and completing assessments on over 100 acres; developing a sustainable model for regional cooperation that is transferable to other communities. In mid-2007, we successfully closed out grant activities related to a \$950,000 grant from the Department of Commerce's Economic Development Administration, which was used for the asbestos abatement and demolition of the former St. Louis Army Ammunition Plant site at 4800 Goodfellow. These are but two examples of numerous federal grants management highlights.

Previous EPA assessment grants have been a critical link to bringing development interest back into the city. In October 2008 we closed out a \$400,000 Brownfield Assessment Grant;

¹⁶ Data courtesy of Missouri Department of Economic Development, June 2008.



our remaining balance was \$3,219.30, which was unexpended from our travel budget. In December 2008 we will complete another \$400,000 Brownfield Assessment Grant; our remaining balance is \$81,681, all of which is committed for assessments on three sites. With funding from these grants, we completed Phase I Environmental Site Assessments (ESAs) on 21 sites throughout the City and completed Phase II ESAs on 26. While this is a laudable accomplishment, the City's inventory of brownfields continues to grow, and the five tax sales per year promise to add to that number. Previous EPA funding has been critical, and additional funds are needed based upon the seemingly endless volume of abandoned and underutilized sites that fall to City ownership through tax foreclosure.

SLDC is currently in compliance with the reporting requirements of our three cooperative agreements with EPA. This includes Quarterly Progress Reports, Financial Status Reports, MBE/WBE Utilization Reports, and Property Profile Forms. We are also in compliance with the work plans, schedules, and terms and conditions for all of our grants. In June we completed a successful desk audit of all of our grants by EPA Region 7 personnel, and in October we had a successful program review of our Revolving Loan Fund, also by EPA Region 7 personnel. No issues were raised from these audits.

SLDC and its related agencies have entered into numerous cooperative agreements with EPA for hazardous substance assessments, petroleum assessments, and a revolving loan fund grant. **Since 1998, we have completed an area-wide assessment of the 1100-acre North Riverfront Area, completed Phase I and II Environmental Sites Assessments (ESA) on more than 200 acres of Brownfields land, entered 110 sites into our Abandoned Gas Station Program, and received clean closure of 24 abandoned gas station sites.** Significant successes leveraged from the expenditure of cooperative agreement funds include the following: St. Louis Commerce Center, a \$19 million new private investment with 250 jobs created and retained; creation of a \$4.9 million Land Development Fund, the recent Produce Row expansion announcement, and leveraging \$2 million in federal empowerment funds for development assistance and infrastructure improvements, all in response to our 2004 North Riverfront cooperative agreement; a \$40 million industrial development proposal has been selected as a result of our assessment work at the Carondelet Coke former manufactured gas plant site (2003 cooperative agreement); work at the City Hospital Brownfields site has leveraged \$45 million in new private investment (\$45-60 million investment planned for the adjoining Bohemian Hill project), and \$5.2 million in remediation tax credits. Last year we loaned and sub-granted more than \$1 million from our 2003 EPA Revolving Loan Fund, which is leveraging more than \$178 million in private investment. These are just a few of the outputs and outcomes of EPA investment to-date.

SLDC's Engineer Project Manager, Chad Howell, has 11 years experience managing EPA assessment grants and has worked as an environmental professional for 18 years. He has been a registered Environmental Property Assessor with the National Registry of Environmental Professionals since 1998 and is seeking Registered Environmental Manager status. Mr. Howell has personally performed more than 300 Phase I and II Environmental Property Assessments. SLDC has in-place a "short list" process for securing the services of

environmental engineering firms based on the federal Qualifications Based Selection (QBS) process and currently has in-place standing contracts for environmental services with seven firms, who currently adequately address our need for environmental contracting. This process was repeated and streamlined in summer 2008. SLDC/LRA also employs a full-time assistant project manager who assists with EPA grants through fiscal tracking and fulfilling EPA reporting requirements. She has participated in ACRES training so all future Property Profile Forms will be submitted online, thereby reducing paper use.

SLDC conducts the equivalent of a Circular A-133 Audit on an annual basis, using an outside accounting firm. No adverse audit findings have resulted and no adverse audit findings have been issued by any local, state, or federal inspector general or similar organization.

ii) Not Applicable

3. Community Engagement and Partnerships

a. Plan for involving the affected community.

As an agent for the LRA, SLDC has undertaken a multi-faceted strategy to notify the public of this grant opportunity. We convened a public meeting to allow for review and comment before submitting this application. The meeting was held in the SLDC boardroom, which is commonly known to the community at large as a place for public meetings; not only do the City's economic development authorities hold monthly board meetings in the venue, but it is also typically used for public meetings related to city planning, community development, and historical preservation functions. A notice of the meeting was published in the St. Louis Post-Dispatch; we also posted the meeting notice on the City's Public Meetings Calendar and on SLDC's website. Additionally, e-mails were sent to specific community organizations involved in the project, as well as other stakeholders. The notice included a clear description of the meeting's purpose, along with driving directions and parking suggestions. All of these meeting notifications occurred at least two weeks prior to the submittal date for this application. Additionally, we began notifying people about the meeting up to a month beforehand. Interested parties had the opportunity to provide comments at the meeting and via email or phone. Copies of the draft applications were posted on our website and at the local library.

In addition to the process above, discussed the proposed grant with community leaders in the neighborhood, many of whom provided the attached letter of support. We will regularly update our contacts within these partner organizations to provide updates.

Community involvement in cleanup and reuse planning also comes from partnerships formed both at the state and neighborhood level. Cleanup planning is largely a function of the Missouri Department of Natural Resources (MDNR); the level of environmental remediation required to make a site safe for its intended reuse is prescribed by the Missouri Brownfields/Voluntary Cleanup Program (for hazardous substances) and the Storage Tank Division (for petroleum) through implementation of the Missouri Risk Based Corrective Action standard. This cutting-



edge cleanup program was designed and is continually improved through extensive consultation with the Missouri Department of Health and Senior Services. Every step of design and implementation was and is conducted with opportunity for community input. Since SLDC's use of grant funds is normally confined to properties that are publicly owned, SLDC staff ensures that the affected properties are enrolled in the appropriate MDNR cleanup oversight program.

Staff already has a system in place for reaching out to the community when making cleanup decisions, which was developed through our revolving loan fund program. An administrative manual will be prepared for the subject property, and will contain relevant information such as all environmental assessment information, agency resolutions, MDNR/BVCP correspondence, a community relations plan, and an Analysis of Brownfields Cleanup Alternatives (ABCA). Essentially, once a draft ABCA is prepared, staff will advertise and convene a community meeting to solicit input before the ABCA is finalized.

Prior to sale of public property, other opportunities exist to involve stakeholders at every level. For example, Brownfields land owned by the City's Land Reutilization Authority is only sold when specific developments are proposed that are already in compliance with the City's 2005 Comprehensive Plan, ensuring that new development is consistent with plans developed after extensive consultation with neighborhood stakeholders. Additionally, all publicly-owned Brownfields transactions are recommended, deliberated, and approved in a public setting, at the appropriate agency monthly board meeting.

The neighborhoods in which the cleanups are proposed are not home to large populations of non-English speaking residents; therefore we did not advertise in any foreign language newspapers. However, if this changes in the future, we will make every effort to communicate with non-English speaking residents.

b. Efforts/plans to development partnerships with environmental, health, and other governmental agencies.

We do not routinely work with the local Health Department because they focus on air quality and defer other environmental cleanup issues to the state. Public health issues related to Brownfields assessment and cleanup are addressed by enrolling sites (where appropriate) in the MDNR's Brownfields/Voluntary Cleanup Program (BVCP), and/or complying with rules administered by MDNR's Tanks Section, and thus conforming with the state's Risk-Based Corrective Action approach to remediation. As with many states, this program aims to establish minimum guidelines for cleaning sites to the level appropriate for their reuse, using a variety of engineering and institutional controls. All of MDNR's cleanup programs were developed with heavy involvement of the Missouri Department of Health and Senior Services (DHSS), to ensure that cleanup decisions are protective of human health. Not only was the DHSS an important stakeholder during program development, but they continue to play important roles in program administration: DHSS review is required of any Tier III risk analysis submitted for MDNR concurrence; any deviation from standard approaches requires DHSS concurrence; an updated



health assessment is prepared by DHSS for any site listed in Missouri's Registry of Confirmed Abandoned or Uncontrolled Hazardous Waste Disposal Sites.

SLDC frequently enrolls sites in the MDNR's BVCP, and is intimately familiar with its requirements and regulatory personnel. Environmental information is shared freely between SLDC, its consultants, and state regulators; science-based cleanup decisions are reached mutually. Staff will continue to work with partners at the Missouri Department of Natural Resources to ensure that petroleum sites are addressed according to current Tank's Section policy, in compliance with the Missouri Risk-Based Corrective Action program and are protective of human health and the environment. This will ensure that cleanup is effective and contaminated soil and materials are properly managed and disposed.

Staff also routinely participates in the Regional Chamber & Growth Association's Environmental Council and its Brownfields Subcommittee, who are currently planning the third Regional Brownfields Marketplace, a lively event designed to bring developers, Brownfields owners and regulatory agencies together in a spirit of partnership; other planning committee members include the local consulting community, St. Louis University College of Public Service, East-West Gateway Council of Governments, and St. Louis County. Two successful redevelopment projects stemmed from the 2007 Brownfields Marketplace.

c. Description and role of key community organizations involved in project.

By partnering with local organizations we ensure that City development goals are inclusive of the community's goals, so that the needs of both groups **are met. Placeholder will be integral** in helping SLDC communicate cleanup alternatives to the community once we receive the grant. Additionally, these groups will be partners in any development plans that occur once cleanup is complete.

4. Project Benefits

a. Welfare and/or Public Health

Many environmental and social benefits are anticipated from the redevelopment of the Former Spotless Car Wash Site. As discussed in Section 1.a.i., the negative effects from environmental contamination are many. Through cleanup we can ensure the direct elimination of hazards to human health and the environment. The first step will be to protect the population from contaminants by installing a six-foot chain link fence to prevent trespassing, illegal dumping, and the likelihood of injury from such activities. The cleanup will entail removal of specific contaminants found at the site, as detailed in the table below, which were detected at concentrations above what is considered safe for non-residential use. Remediation of these contaminants will have a direct and positive impact on the safety of the employees of surrounding businesses.



Contaminants found at Former Porter Oil Site	Possible Human Health Effects¹⁷
Benzene	anemia, leukemia
Ethyl benzene	dizziness, eyes burning
Naphthalene	anemia, cataracts, lung damage
Toluene	memory loss, nausea
Xylenes	kidney & liver damage
Total Petroleum Hydrocarbons	nerve disorder

SLDC’s success in using a variety of tools to ensure redeveloped uses are environmental and social welfare is a matter of record, and our redeveloped abandoned petroleum sites are more environmentally-friendly today than in their past. At 5200 Delmar Boulevard, an abandoned 1930s service station was remediated and renovated and is now an 8,000-square-foot public-access glass art education center; the adjacent lot underwent remediation and is being turned into a sculpture garden for the center. Down the street at 5162 Delmar Boulevard, a former gas station has been cleaned up and the former garage may be reused for office space. At 4001 McRee Avenue, four tanks were removed and new housing has been built. At 4189 Washington Avenue, five new townhouses have been constructed on a former petroleum site. At 3204 St. Louis Avenue, a former auto repair shop was purchased by Habitat for Humanity to construct new affordable single-family homes.

b. Economic Benefits and/or Greenspace

i) Cleanup grant funds will promote economic benefits in lower income neighborhoods through increased tax base and job growth. Cleanup will help restore neighborhood pride by eliminating blight. Because LRA focuses its redevelopment efforts on abandoned and underutilized properties, and because we sell such lands for the purpose of expanding the tax base and creating quality jobs, this grant will have a direct impact on promoting a healthier economic environment. By cleaning the subject property, LRA can plan for positive changes, thereby eradicating blight and improving both property values and neighborhood pride. The LRA recognizes the economic reality that given their history, urban sites are often more prone to environmental contamination and are therefore at a distinct economic disadvantage in the competition with suburban greenfields. Cleanup funds help level the playing field by making the subject property safe for redevelopment.

ii) **Not Applicable, as the site will not be used for greenspace or other not-for-profit activities.**

¹⁷ Agency for Toxic Substances and Disease Registry, Department of Health and Human Services. www.astdr.cdc.gov



c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

In the St. Louis region, suburban sprawl is an ongoing problem as properties are left underutilized within the City, and greenspace outside of the City is turned into hardscape. As stated in Section B of this proposal, **the City as a whole has lost 53 percent of its population since 1960, whereas adjacent counties have seen their populations increase by up to 34 percent from 1990 to 2000.** Soaring highway and infrastructure costs, increased racial segregation, loss of farmland, and reduction in air quality due to long commutes are just a few of the consequences of unchecked sprawl. Unfortunately the Missouri-Illinois region has an extensive highway system which has enabled sprawl to encroach into outlying counties.

Cleanup accomplished through this grant will help prevent pollution and reduce resource consumption through Brownfields prevention, infrastructure reuse, and a local government commitment to achieving green building standards. When former Brownfields are sold for redevelopment, the St. Louis City Land Reutilization Authority (which is the owner of last resort through the tax foreclosure process) prevents future Brownfields by ensuring that the reuse is consistent with the City's comprehensive plan, and the developers are bona fide and financially able to complete the project as planned; this minimizes the likelihood that property will revert back to public ownership. In most cases, we preserve the ability to "claw back" incentives and even property ownership should the developer fail to achieve key goals. Cleanup activities will help us create a climate in which development can once again occur in our urban core and help to reduce sprawl and encourage increased urban density. **For every acre redeveloped in the urban core, we are preventing at least that much space from being developed in sprawl communities, and it helps prevent pollution and reduce resource consumption by encouraging the redevelopment of property where people already live and where the necessary roads, sewers, water lines, and public transportation already exist.** Using infrastructure that is already in place is a more environmentally conscious alternative than constantly expanding infrastructure, at taxpayer expense, into the hinterland. The Former Porter Oil Site is 1.3 miles from the nearest light rail station and 0.25 miles from major bus routes, which provide future users of the site to take advantage of public transportation options.

St. Louis has an established commitment to promoting green building standards. In March of 2007, St. Louis hosted the National Association of Homebuilder's National Green Building Conference, with William McDonough as a keynote speaker. Later in 2007, City Ordinance 67414 was adopted, directing the Board of Public Service to adopt the Leadership in Energy and Environmental Design (LEED) Green Building rating system for all newly constructed and renovated city-owned facilities. Going forward, we will actively coordinate with the St. Louis Chapter of the U.S. Green Building Council to promote green building concepts in new developments. Additionally, City Ordinance 67803 was adopted in 2008, adopting an energy efficiency and greenhouse gas reduction policy for municipal building projects; bid packages for new buildings, building additions, or major remodels will require energy consumption estimates and proposed energy efficiency measures.

There are many EPA initiatives that support sustainable reuse of brownfields; however, most of these apply in the post-cleanup stages of redevelopment. However, Demolition Recycling during cleanup one way we can limit harm to the environment. SLDC will commit to requiring contractors to recycle any demolition materials that result from redevelopment of the site. SLDC will also recycle the free product we recover from the water table during cleanup. We additionally support the Green Remediation Goals as defined by the EPA and will work to ensure we accomplish as many as possible. Some of these goals will be accomplished directly with the cleanup, including: 1) Achieve remedial action goals, 2) Support use and reuse of remediated parcels, 3) Reduce total pollutant and waste burdens on the environment, and 4) Minimize impacts to water quality and water cycles.

d. Plan for Tracking and Measuring Progress of Expected Project Outcomes

The anticipated final outcome of the project is the complete remediation of the Former Porter Oil Site. Intermediate outcomes for this Cleanup Grant are as follows: 1) removal of up to nine underground storage tanks and any residual product; 2) removal of contaminated soil. In order to measure progress, a schedule of activities will be produced as part of the work plan, and staff will compare the schedule with current events at least quarterly, when progress reports are generated. Progress will be tracked based upon status of executed contracts with the cleanup and oversight firms. Keeping Property Profile Forms up to date is another way of tracking and measuring progress (all of these will be completed through ACRES). Additionally, and as we have done in the past, we will meet periodically with our EPA Region 7 project managers to ensure that outputs are delivered on time and that outcomes are tracked going forward. Finally, measures of success will be tracked and distributed to the community through the use of informational brochures and community meetings, thereby involving stakeholders in the decision-making process.