

**Analysis of Brownfields Cleanup Alternatives (ABCA)**  
**Former Spotless Car Wash Site**  
**3300 Wisconsin Avenue**  
**St. Louis, Missouri**  
November 10, 2011

## **BACKGROUND**

The Land Reutilization Authority of the City of St. Louis purchased the former Spotless Car Wash site on March 23, 2011, at the request of the City of St. Louis Community Development Administration, in an attempt to stabilize its blighting influence on the neighborhood. The Site is located at a commercial intersection in a largely residential neighborhood, at the southeast corner of Wisconsin and Utah in the Benton Park neighborhood of the City of St. Louis. The Site consists of just 0.17 acres and is characterized by the presence of a dilapidated former service station building. A Site Plan is included as Figure 1.

Prior environmental reports for the Site include a Phase I Environmental Site Assessment (PSC Industrial Outsourcing, February 16, 2011). The Phase I ESA report was performed in order to satisfy the All Appropriate Inquiry standard (to prevent LRA from unwittingly becoming liable for cleanup) and to develop a baseline set of expectations when planning for the productive reuse of the site. While several inspections have been conducted by DNR personnel over the years, no testing has occurred. Regardless of this fact, several complaints from neighborhood residents are on file regarding vapors emanating from the site. DNR records show there could be anywhere from seven to nine tanks on the site, all apparently improperly closed in place (filled with sand).

Personnel from Geotechnology, Inc. will perform soil and groundwater testing of the site on November 15, 2011, consistent with the American Society for Testing and Materials (ASTM) Designation E-1903-11. It is not unusual for this type of investigation to confirm that petroleum constituents have been released to the subsurface environment. As results become available, this ABCA will be amended.

Since eligibility for reimbursement of cleanup costs has been denied by the Petroleum Storage Tank Insurance Fund (PSTIF), the site will likely be enrolled in MDNR's Brownfields Voluntary Cleanup Program (BVCP) once the tanks are properly removed, in order to receive a Certificate of Completion for satisfactory remediation of the property, and thereby restore a level of environmental certainty to the redevelopment equation.

Following satisfactory remediation of the Site, the LRA intends to make the property available for commercial redevelopment.

## **DEVELOPMENT PLANS**

The site is in a predominantly residential neighborhood, but zoned for neighborhood commercial uses, as are the remaining three corners. The site is situated only one block to the north of the Cherokee Street “Antique Row” and is thought to have better than average redevelopment potential. Staff will work with commercial development specialists and the Alderman to find a productive reuse for the site.

## **ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES**

The following describes the Analysis of Brownfields Cleanup Alternatives for the Site. The cleanup alternatives evaluated include the scenario if no cleanup were conducted (do nothing), remediation using restricted risk-based approaches, remediation to unrestricted risk-based site cleanup goals, and remediation to background (naturally occurring) concentrations.

### **Do Nothing Approach**

If no remedial actions are performed, unacceptable risk to future occupants of the property would remain onsite. This is unacceptable as the property will continue to be out of compliance with Missouri Underground Storage Tank regulations, and it would minimize the likelihood of redevelopment.

### **Remediation Using Restricted Risk-Based Cleanup Alternative**

Risk-based approaches to site remediation can be completed using the MDNR Missouri Risk-Based Corrective Action (MRBCA) guidance. If entered into the BVCP for remediation oversight, a “certificate of completion” can be achieved from the MDNR following acceptable site remediation.

Risk-based strategies include an evaluation of site cleanup goals largely based on exposure pathways to contamination and current and anticipated future site use. Under the MRBCA guidance, contamination exceeding risk-based target levels can remain onsite through the implementation of engineering and institutional controls (i.e., physical barriers and/or deed restrictions). This alternative is often the most cost-effective for commercial redevelopment.

### **Remediation Using Unrestricted Risk-Based Cleanup Alternative**

Soil remediation to unrestricted risk-based site cleanup goals can also be completed using MRBCA guidance. Advantages for using these unrestricted risk-based approaches include being able to receive a “certificate of completion” from the BVCP within the project timeframe and ultimately deeding over an unrestricted site to future property owners. Disadvantages for this approach include moderately high costs associated with remediation as opposed to a restricted site remediation. It should be noted, however, that while remediation costs are likely to initially be moderately high relative to restricted risk-based approaches listed above, there would be no additional

development costs associated with this approach such as long term monitoring of engineered barriers.

### **Remediation to Background (Naturally Occurring) Concentrations Alternative**

This remedial approach is similar to that of the unrestricted risk-based site cleanup goals and would ultimately produce a “certificate of completion.” This approach would also provide future unrestricted site use. However, this remedial approach would be the most costly approach to site remediation and threaten the project timetable due to additional remediation beyond unrestricted risk-based site cleanup goals.

### **SUMMARY/CONCLUSIONS**

Based on the above detailed analysis, the most cost-effective approach to receiving the necessary “certificate of completion” for the proposed future commercial development is **Remediation Using Restricted Risk-Based Cleanup Alternative**. However, once the tanks are out of the ground and any grossly contaminated soil is properly disposed, confirmation sampling results may lead us towards a higher level of cleanup (**Remediation to Unrestricted Risk-Based Cleanup Alternative**), which could add value to the eventual real estate transaction. Of these two remedial approaches, staff will seek the most cost effective solution once tank and soil removal are completed, in accordance with the MDNR regulations and guidelines.

Respectfully submitted,

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Figure 1.

