



August 6, 2009

Jay Simon  
Metropolitan Development -Laclede Power LLC  
7174 Manchester Rd.  
St. Louis, Missouri 63143

**Re: Laclede Power Building  
1246 & 1300 Lewis Street  
St. Louis, Missouri 63102**

### **Analysis of Brownfields Cleanup Alternatives (ABCA) Laclede Power Building**

Dear Mr. Simon:

This document presents an Analysis of Brownfields Cleanup Alternatives (ABCA) for former Laclede Power Building and adjacent north parking lot at 1246 and 1300 Lewis Street, St. Louis, MO 63102. This ABCA was prepared by Lafser & Associates on the behalf of Metropolitan Development-Laclede Power Group LLC as a part of the receipt of EPA grant money for environmental cleanup of the site. This ABCA has been prepared in general accordance with the United States Environmental Protection Agency (EPA) guidance for Cleanups receiving EPA grant funds. The scope of work for this ABCA includes the removal of asbestos and lead-based paint that were identified at the subject site.

#### **1.0 Purpose and Scope**

Under EPA's Brownfield Cleanup Revolving Load Fund (BCRLF), loan recipients, borrowers, or recipients of EPA grant funds must supply an ABCA that includes:

- Information about the site and contamination issues.
- Effectiveness, ability to implement, and the cost of each alternative, including the preferred or proposed cleanup alternative;
- A comparative analysis of the alternatives considered; and
- Assessment of whether additional land-use controls will be necessary after the environmental cleanup is complete.

This document supplies the necessary information and analysis to meet these criteria.

## **2.0 Introduction**

The Subject Properties are a set of two adjoining parcels in the north downtown riverfront area at 1246 Lewis and 1300 Lewis Street, St. Louis, Missouri, 63102. The subject site is referred to as the Laclede Power Building at 1246 Lewis Street and an adjoining vacant lot at 1300 Lewis Street. The two adjoining subject sites are bounded by Lewis Street to the west, Ashley Street to the south and east, and O'Fallon Street to the north. The Mississippi River is located approximately 200 feet to the east of the subject properties.

According to the City of St. Louis Tax Assessor's Office, the parcel at 1246 Lewis Street consists of approximately 0.425 acres in city block 226. The parcel locator (handle) number for 1246 Lewis Street is 10226000015. The parcel at 1300 Lewis Street consists of a vacant lot of approximately 0.236 acres. The parcel locator (handle) number for 1300 Lewis Street is 10225000015. Both parcels are owned by MDLPG LLC. The subject properties are located in an area with a mix of various industrial and commercial properties.

The building at the subject property that is located on the parcel at 1246 Lewis Street housed Laclede Power, which was used for greater than fifty years as an electrical power switching substation from 1904 to the late 1970's, after which time the building

has been left vacant. The Laclede Power Building is a 4-story brick and steel building with basements and a sub-basement. The basement is 20 feet below grade. Below the basement, there is a sub-basement quarried out of limestone that is approximately 30 feet below the basement, accessible thru a ladder entrance from one area of the basement.

The parcel of the subject property at 1300 Lewis Street is currently a vacant lot. According to the City of St. Louis Assessor's office, there was a building located at the site which was demolished in the early 1990's. Historically the parcel at 1300 Lewis Street had been used as an automotive shop and a manufacturing facility from the early 1900's to the early 1980's.

Initial site assessment and cleanup of environmental contamination at the subject site was conducted by Riverfront Environmental and Sitex Environmental for previous owners of the property, Trailnet Inc, prior to May, 2007. After this date, Lafser & Associates (L&A) was selected by Metropolitan Development Laclede Power LLC to serve as an environmental consultant for the properties at 1246 and 1300 Lewis Street. Environmental site inspections conducted by L&A identified remaining asbestos and lead-based paint at the subject properties to be remediated prior to site redevelopment, as identified in the Brownfield Remediation Tax Credit Application for the properties dated September, 2007.

### **3.0 Development Plans**

The proposed project is a mixed development that includes an entertainment venue, retail shops, bicycle repair shop and corporate office space for Metropolitan Development Laclede Power.

## **4.0 Analysis of Brownfields Cleanup Alternatives**

A total of two (2) alternatives have been developed for the site remediation and are discussed in this ABCA. These alternatives have been evaluated based on meeting the regulatory requirements for the identified environmental contaminants in the subsurface basement as well as meeting the redevelopment goals of the site. Each alternative is described below.

### **Alternative 1: No Action**

The No Action alternative is included as a baseline and is basically the “do-nothing” alternative. Lead and asbestos would remain intact on the site. Land-use controls would be necessary at the subject site using Alternative 1.

### **Alternative 2: Remediation of Lead-Based Paint and Asbestos**

Under this alternative, all asbestos and lead-based paint would be removed from the site. Land-use controls would not be necessary at the subject site using Alternative 2.

## **Evaluation and Comparison of Cleanup Alternatives**

A general evaluation of the potential alternatives considered in this ABCA is summarized in the table below. The table is structured for comparison of alternatives by describing the benefits and limitations of effectiveness, ability to implement, and associated costs for each alternative.

| <b>Alterative</b>  | <b>Effectiveness</b>  | <b>Ability to Implement</b>                                   | <b>Cost</b>   |
|--|---|---|---|
| Alternative 1<br><br><i>Do Nothing</i>                               | Does not eliminate potential risk at site.                              | Easy to implement; however site redevelopment will not occur. | No immediate cost<br><br><b>Alternative 1 Cost:<br/>\$0</b> |
| Alternative 2<br><br><i>Removal of Lead-Based Paint and Asbestos</i> | Removes Asbestos and Lead from site allowing redevelopment of the site. | Minor implementation risks to workers conducting the removal. | <b>Alternative 2 Cost:<br/>\$450,000- 500,000</b>           |

### **Selection of Preferred Alternative**

**Alternative 1**, the No Action alternative, was included in this ABCA for comparative purposes only. This is not a feasible cleanup alternative for the site because it is not effective at meeting the project objectives. Although this alternative would be easy to implement, it is also not considered cost effective due to the continued risks to the environment.

**Alternative 2**, Asbestos and Lead-Based Paint Removal would achieve regulatory compliance with the Missouri Department of Natural Resources by removing the contaminants from the site. Implementation of this alternative is straightforward with minimal risks to certified workers conducting abatement. The removal of the asbestos and lead-based paint meets all of the development goals of the site.

## 5.0 Summary/Conclusions

Based on the above detailed analysis, the most optimal approach for meeting the future site development plans while providing a “certificate of completion” and unrestricted site use is to Alternative 2 to remediate all remaining lead-based paint and asbestos at the site.

If you have any questions or we can be of further assistance, please do not hesitate to contact us. We appreciate the opportunity to be of service to you.

Sincerely,

A handwritten signature in black ink that reads "Sandra Kaiser". The script is cursive and fluid.

Sandra Kaiser  
Environmental Manager  
Lafser & Associates, Inc.