

Beth



Bob Holden, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

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DEC 6 2004

CERTIFIED MAIL # 7002 0860 0007 6968 0896
RETURN RECEIPT REQUESTED

Ms. Elizabeth A. Noonan
Project Manager
St. Louis County Economic Council
121 South Meramec, Suite 900
St. Louis, MO 63105

Re: Final Certificate of Completion
Plymouth Industrial Park Site, 6401 Plymouth Avenue, Wellston, Missouri

Dear Ms. *Beth* Noonan:

The Hazardous Waste Program's Brownfields/Voluntary Cleanup Program (B/VCP) has reviewed and approved the October 13, 2004, *Surface Cap Operations & Maintenance Plan and Soils Management Plan* and a Declaration of Restrictive Covenant and Grant of Access document has been filed with the St. Louis County Recorder of Deeds in the property chain of title for the Plymouth Industrial Park B/VCP site. This letter is to certify that based on this and other submittals, no further remedial action with respect to soil and groundwater contamination is needed at the Plymouth Industrial Park site related to the contamination identified in the environmental site assessments and for which closure has occurred under the oversight of the B/VCP. This Certification of Completion is contingent on the conditions in the Declaration of Restrictive Covenant and Grant of Access and the B/VCP Institutional Control Contract being met now and in the future.

Failure to comply with the conditions of either the restrictive covenant or the contract may result in this letter being declared null and void. Should this occur, an additional notice would be placed in the property chain of title by the department.

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Site assessments of the property revealed the existence of chlorinated solvents and heavy petroleum in the shallow groundwater and polychlorinated biphenyls and petroleum in the soils across the site. St. Louis County initiated a series of remedial actions, including:

- Excavation and off-site disposal of over 1,424 tons of contaminated soil;
- Application of 37,000 pounds of hydrogen release compound at the northeast portion of the site to treat shallow groundwater contaminated with chlorinated solvent compounds;
- Removal and off-site disposal of five underground storage tanks containing a petroleum sludge material;
- Stream bank stabilization along the eastern boundary of the site;
- Construction of a minimum of two feet of compacted clay soils over remaining soil contamination to serve as an engineered barrier. Most of the site has greater than two feet of clean fill in order to bring the site elevation out of a floodplain for development. In addition, most of the site will be paved during redevelopment of the site at a later date.

With the implementation of these actions, all known environmental concerns related to the soils and groundwater at the site have been investigated and remediated to the cleanup levels established in the approved remedial action plan, with the exception of the remaining contaminated soils located under the compacted soil cap. The department has determined that the levels of these contaminants are not high enough to warrant additional remedial action as long as the cap is maintained properly and appropriate restrictions are placed on the property. Because Scenario A cleanup standards, as specified in the department's guidance document *Cleanup Levels for Missouri, July 1998*, were not attained, a restrictive covenant is required by the department.

The contract entered into between the department and St. Louis County for this site is an integral part of the department's approval of site closure. Any future owner of this property will be expected to enter into a similar contract with the department to facilitate the department's ability to ensure the conditions of the restrictive covenant are being met.

Should future monitoring or other investigations at or near the subject property find that additional contamination is present that was not identified or addressed during the investigations and remedial actions that are referred to in this letter, the department may require additional

Ms. Elizabeth A. Noonan

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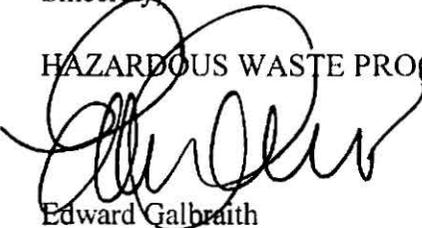
investigation and remedial action as necessary. Further, should the department determine that any condition set forth in the attached restrictive covenant or contract is breached, the department may declare this letter null and void through the placement of an additional notice in the property chain of title.

Complete files concerning the investigation and remediation of this site are maintained at the offices of the Missouri Department of Natural Resources, Hazardous Waste Program.
1738 East Elm Street, Jefferson City, Missouri 65101.

Congratulations on the completion of this project, and thank you for your efforts to address this site. If you have any questions, please contact Mr. Rob Murphy of my staff at (573) 526-8913 or P.O. Box 176, Jefferson City, Missouri 65102-0176.

Sincerely,

HAZARDOUS WASTE PROGRAM



Edward Galbraith
Director

EG:rmp

IN WITNESS WHEREOF, the Missouri Department of Natural Resources has caused this agreement to be executed on this 6th day of December, 2004.

Signed in the presence of the Missouri Department of Natural Resources subscribed and sworn to.

MISSOURI DEPARTMENT OF
NATURAL RESOURCES



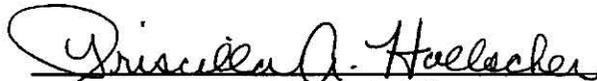
Name: Edward Galbraith

Title: Director, Hazardous Waste Program

STATE OF MISSOURI)
)
COUNTY OF COLE)

On this 6th day of December, 2004, before me personally appeared Edward Galbraith, to me personally known, who, being by me duly sworn, did say that he is the Director of the Hazardous Waste Program of the Missouri Department of Natural Resources, a state agency, and that said instrument was signed on behalf of the Missouri Department of Natural Resources by authority of its Director; and said Edward Galbraith acknowledged said instrument to be the free act and deed of the Missouri Department of Natural Resources.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal in the County and State aforesaid, the day and year first above written.



Notary Public

(SEAL)

My Commission Expires: December 3, 2005

PRISCILLA A. HOELSCHER
NOTARY PUBLIC STATE OF MISSOURI
COUNTY OF COLE
MY COMMISSION EXPIRES:
DECEMBER 3, 2005