Missouri Department of NATURAL RESOURCES
dnr.mo.gov
Michael L. Parson, Governor
Carol S. Comer, Director

OCT 1 1 2018

Mr. Dave Palmer
Ameren Services
1901 Chouteau Avemue
PO Box 66149, Mail Code 602
St. Louis, MO 63166

RE: Certificate of Completion
Columbia Coal Gas - East Parcel, 210 Orr St., Columbia, Missouri

Dear Mr. Palmer:

Please find enclosed your Certificate of Completion letter for the Columbia Coal Gas - East Parcel site. To complete the process, please file the letter in the property chain of title at the office of the Boone County Recorder of Deeds and return a certified copy as-filed to my attention. Filing fees may be charged by the Recorder of Deeds.

Any funds remaining in your account for this site will be refunded by the Department. If no credit balance remains, you will receive at least one more quarterly billing statement for the site.

Thank you for participating in the Brownfields/Voluntary Cleanup Program, and congratulations on the completion of this project.

Sincerely,

HAZARDOUS WASTE PROGRAM

Chris Cady

Chris Cady, Ph. D.
Environmental Scientist
Brownfields/Voluntary Cleanup Section

CC: jj

Enclosure

Recycled paper

Missouri Department of NATURAL RESOURCES
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CERTIFIED MAIL # 7017 0190 0000 6510 0364
RETURN RECEIPT REQUESTED

Mr. Dave Palmer
Ameren Services
1901 Chouteau Avemue
PO Box 66149, Mail Code 602
St. Louis, MO 63166

RE: Certificate of Completion
Columbia Coal Gas - East Parcel, 210 Orr St., Columbia, Missouri

Dear Mr. Palmer:

The Missouri Department of Natural Resources' Brownfields/Voluntary Cleanup Program (BVCP) has approved the report titled *Risk Management Completion Report, Columbia Former Manufactured Gas Plant Site* prepared by PSC, as well as other submittals regarding the site. We have received a certified copy of the Environmental Covenant as filed at the Boone County Recorder's Office for the site, located at 210 Orr St., Columbia, Boone County, Missouri, and more particularly described as follows:

> A tract of land in the west half of the northwest quarter of the southwest quarter of Section 7, T48N, R12W, Boone County, Missouri, being the composite tract described by deeds recorded in Book 174, page 14; in book 182, page 151; in book 187, page 266; in book 363, pages 272, 273, and 274, all being contained in the 1.01 acre tract shown and described by a survey recorded in book 432, page 701, including lot 2, Judge and Sims subdivision, Columbia, Missouri;
>
> Also being the composite tract described by deeds recorded in book 406, page 891; in book 680, page 165 and corrected in book 700, page 590; in book 684, page 771; and in book 907, page 36, all being Boone County survey #5274 and that tract lying between said county survey and said 1.01 acre survey as described by said deed recorded in book 407, page 891; and lots 1, 3, 4 and the unnamed lot lying east of and abutting said lot 4 of Judge and Sims subdivision as shown in plat book 3, page 19, all of the Boone county records;
>
> Comprising 2.14 acres more or less.

This letter is to certify that, based upon these and other submittals provided, the Department has determined that the site is safe for all reasonably anticipated land use.

Site investigations revealed that certain portions of the property were impacted with manufactured gas plant-related materials as a result of the former operations.

31,612 tons of contaminated soil was excavated and disposed at an approved landfill. The depth of the excavation varied from 10 to 20 ft. below grade and covered a large area in the center of the site, extending west to near Orr St. where a sheet piling was installed during the 1994 excavation of the west parcel and the Orr St. right of way. A stormwater box culvert running east-west through the site was relocated to the south to allow for removal of contaminated soil beneath.

Confirmation samples from the walls and floor of the excavations met Tier 1 Risk-Based Target Levels (Missouri Risk-Based Corrective Action Guidance, 2006) for non-residential use except in certain limited areas of the site.

Groundwater investigations detected low levels of dissolved contaminants in shallow (overburden) groundwater that were determined not to pose a health risk provided groundwater is not used.

A Site Management Plan was developed to provide for future management of residual contaminants during any future redevelopment and reuse of the site. The Plan was attached to the Environmental Covenant placed in the property's chain of title. The Covenant includes limitations on property use and requires the owner to follow the Management Plan.

No Further Action Determination

The department has determined that the remedial actions taken were adequate to remove chemicals of concern to risk levels acceptable for non-residential use of the property.

Activity and Use Limitations (AULs)

The department has determined that this site does not pose any unacceptable risks to human health or the environment, assuming that appropriate land uses are ensured and that AULs are in place and implemented. For this site, an Environmental Covenant is the appropriate AUL. The Covenant contains the following limitations for the property: Non-Residential Use, Soil Disturbance Only In Accordance with Approved Site Management Plan, Construction Worker Advisory, and No Drilling or Use of Groundwater.

These AULs are an integral part of the remedial actions taken at the site and of the department's approval of the remedial actions.

The department will make occasional inspections to verify that the AULs are upheld.

Other than the AULs specified above, the department has determined that no further action is required related to the chemicals of concern identified in environmental site assessment reports provided to the BVCP. Risk management activities to address the chemicals of concern have been completed under the oversight of the BVCP.

Future Considerations

This Certificate of Completion is contingent upon maintenance of the agreed-upon AULs now and in the future. Failure to comply with AULs can result in the withdrawal of this certificate. Should this occur, notice will be placed in the property chain of title. If new scientific information or regulatory standards warrant the removal of AULs, the department can, at your request, re-evaluate the need for AULs.

Should future monitoring or other investigations at or near the subject site find additional chemicals of concern not identified or addressed during the investigations and risk management activities referred to in this letter, the Department can require additional investigation and risk management in the future.

The Department will maintain paper and database records related to the site. 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, 1730 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 Chris Cady by telephone at (573) 526-8913 or in writing at Hazardous Waste Program, P.O. Box 176, Jefferson City, Missouri 65102-0176.

Sincerely,

HAZARDOUS WASTE PROGRAM

Scott Huckstep, Chief
Brownfields/Voluntary Cleanup Section

SH: ccj

IN WITNESS WHEREOF, the Missouri Department of Natural Resources has caused this certificate to be executed on this 11th day of October, 2018.

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

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Name: Scott Huckstep

Title: Chief, Brownfields/Voluntary Cleanup Section, Hazardous Waste Program

STATE OF MISSOURI)
)
COUNTY OF COLE)

On this 11th day of October, 2018, before me personally appeared Scott Huckstep, to me personally known, who, being by me duly sworn, did say that he is Section Chief of the Brownfields/Voluntary Cleanup 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 Scott Huckstep 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

DEBRA D. DOBSON
Notary Public - Notary Seal
State of Missouri
Commissioned for Morgan County
My Commission Expires: May 25, 2022
Commission Number: 14642864