



R03-24-C-009

**Huntington Area Development Council**

916 Fifth Avenue, Suite 400  
Huntington, WV 25701  
(304) 525-1161

November 8, 2023

**Narrative Information Sheet**

- 1. Applicant Information: Huntington Area Development Council  
916 Fifth Avenue, Suite 400  
Huntington, WV 25701
- 2. Funding Requested:
  - a. Grant Type: Single Site Cleanup
  - b. Federal Funds Requested: \$382,491
- 3. Location:
  - a. City: Huntington
  - b. County: Cabell
  - c. State: West Virginia
- 4. Property Information: Former Huntington East Practice Field  
7<sup>th</sup> Avenue and 29<sup>th</sup> Street  
Huntington, WV
- 5. Contacts:
  - a. Project Director: Adam Phillips  
304/525-1161  
aphillips@hadco.org
  - b. Chief Executive: Dave Lieving, President/CEO  
304/525-1161  
dlieving@hadco.org
- 6. Population: Huntington, WV 45,746
- 7. Other Factors Checklist:

**Other Factors Checklist**

<b>Clear Fork Rail Trail, Raleigh County, WV</b>	<b>Page #</b>
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	

The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The proposed site(s) is in a federally designated flood plain.	
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	2
The reuse strategy or project reuse of the proposed site(s) considers climate adaptation and/or mitigation measures	2
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	

8. Releasing Copies of Applications: Not Applicable

## 1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

### a. Target Area and Brownfields

#### i. Overview of Brownfield Challenges and Description of Target Area

Located on the Ohio River, the City of Huntington, Cabell County, WV, has a rich history as a manufacturing and transportation center. Often called “the River City,” Huntington was incorporated in 1871 as the western terminus and central hub of the Chesapeake & Ohio Railroad and the gateway to the WV coalfields. Due to abundant coal and natural gas resources, Huntington became home to numerous manufacturing facilities, including a variety of goods from textiles and glassware to chemicals and locomotive parts. As these industries declined, many properties were abandoned, leaving hardships ranging from major population loss to poverty rates as high as 61% in census tracts with large minority populations. Beyond this, Huntington has been heavily impacted by the opioid epidemic, with Cabell County having the highest rate of drug overdose deaths per capita in West Virginia. Abandoned and brownfield properties in Huntington are often sites of drug-related criminal activity, creating unsafe conditions in neighborhoods.

Today, Huntington retains its status as one of the largest inland ports in the United States and a major rail hub served by two Class One railroads, CSX and Norfolk Southern freight rail. Over a decade of economic revitalization has resulted in major citywide updates including Downtown’s Pullman Square, a shopping, dining, and entertainment center with festivals and events year-round; and Kinetic Park, a business park with a 70,000 sq. ft. Amazon Customer Service Center. There have been major expansions of two medical care facilities and Marshall University, further boosting the local economy. These developments have impacted not only the economy, but also the quality of life in Huntington for residents. Despite these efforts, multiple brownfield properties, left by the city’s industrial past, still dot the area and obstruct future revitalization plans. To maintain this momentum, it is imperative to clean and redevelop these sites.

The Highlawn neighborhood, the target area for this proposed brownfield cleanup, is a mixed residential and commercial business community with schools, Marshall University facilities, and a major hospital and medical center. Residents of this area (Census Tract 4) tend to be low-income and younger on average than neighboring tracts, with 37.6% of the population falling between the ages of 20-24 and 38% living in poverty. U.S. Highway 60 runs through the neighborhood resulting in high commuter traffic from those going in and out of the City.

Historically, heavy industrial businesses were a significant part of the neighborhood, but closed business and industrial sites have plagued the Highlawn neighborhood for decades, impeding new growth. The City of Huntington has prioritized brownfield redevelopment for the Highlawn community through the Huntington Brownfield Innovation Zone (H-BIZ), part of the overall Huntington Innovation Project (HIP) Revitalization Plan and the “Plan2025” citywide Comprehensive Plan. H-BIZ aims to revitalize Highlawn through creating jobs and pursuing brownfield redevelopment in conjunction with Marshall University and area hospitals. Recent efforts have the Highlawn Neighborhood on the rebound, with new developments already underway.

#### ii. Description of the Proposed Brownfield Site

The former Huntington East High School practice field site is located at the intersection of 7<sup>th</sup> Avenue and 29<sup>th</sup> Street in Huntington’s Highlawn neighborhood. Located near the 393-bed St. Mary’s Medical Center and multiple major travel arteries through town, this location is primed for productive redevelopment. The site has been utilized for a variety of purposes, but was undeveloped until around 1900, at which time railroad tracks were built through its southwestern corner. CSX occupied the property through the early 1970s, using it for unknown railroad activities. After CSX, Huntington East High School used the property as a practice field for their football, soccer, and track teams until the mid-1990s, when the school was consolidated and relocated into the new Huntington High School. From then until 2018, Marshall University used it as a practice field for its soccer and rugby teams. The site has been vacant since then. A running track and two small, deteriorated storage sheds remain on the site, and an active rail line is adjacent to the site at the southern edge of the property.

Phase I and II environmental site assessments conducted on the practice field site identified elevated levels of arsenic and polycyclic aromatic hydrocarbons (PAHs), both known carcinogens, as the primary contaminants of concern in the surface soil and groundwater. In one groundwater sample, PAH concentrations exceeded 9.5 µg/L, seventy-nine times higher than the allowable *de minimis* levels. These chemicals likely resulted from railroad activity earlier in the site's history, as they occur naturally in coal and various petroleum products associated with rail yards. Soil and groundwater hazards will need to be mitigated before redevelopment of the site can occur.

**b. Revitalization of the Target Area**

**i. Reuse Strategy and Alignment with Revitalization Plans**

The former Huntington East Practice Field property will be cleaned to a residential standard and then developed into a new specialized transitional healthcare facility. This plan aligns with the city's strategic priorities in several ways. First, the planned result of the site complements and boosts the largest and most important jobs sector in Huntington, healthcare. Second, the project expands the success of the HIP and H-BIZ brownfield initiatives, which are leveraging previous EPA Assessment grant money to attract private sector funds to clean up and redevelop other brownfield sites, including the ACF and Flint Pigments properties just a few blocks away. Additionally, "Plan2025" emphasizes the need to protect existing housing from encroaching business and healthcare development. Since this property is bordered by other light industrial and commercial properties, it will not disrupt any residential areas of Highlawn. The redevelopment plan was created in collaboration with St. Mary's Medical Center and the New Baptist Church, the two nearest neighbors of the practice field site. The site lays partially within the federally designated floodplain. However, it is at reduced risk of flooding due to a levee. The new construction on the site will include a stormwater management plan to further minimize the risk of both flooding and migration of contaminants.

**ii. Outcomes and Benefits of Reuse Strategy**

A new transitional healthcare facility will build on the expanding medical industry in Huntington, creating over 100 jobs for nearby residents and attracting business growth due to the influx of visitors coming to access medical services. The facility will provide high-quality transitional healthcare options which have previously been lacking, improving health outcomes in the community. Beyond these benefits, the addition of this facility on the undeveloped property will improve the curb appeal of the vacant land and foster continued investment. Redevelopment of the property will create positive impacts without displacing residents or businesses, and has a secondary benefit of displacing drug-related activity that often occurs on Huntington's abandoned properties.

Cleaning up this site will also improve the resiliency of the area to environmental and climate-related hazards. Removing contaminated surface soil will eliminate the risk of human contact and reduce the risk of contaminant migration through stormwater runoff. Moreover, the addition of a stormwater management plan will reduce the frequent combined sewer overflow discharges, assisting with local climate adaptation strategies and managing contaminants in the changing environment. As a newly constructed site, the healthcare facility will be built with cutting-edge climate resilient technology including modern and energy efficient building materials, energy efficient lighting and HVAC systems, automatic heating and cooling systems, and landscaping practices that reduce heat island effects and manage stormwater – all strategies outlined in the Climate Smart Brownfields Manual. The development also sits along various public transit routes run by the Tri-State Transit Authority which can further mitigate additional carbon emissions from commuters. These practices collectively minimize GHG emissions and the carbon footprint of the development.

**c. Strategy for Leveraging Resources**

This requested cleanup grant is really the only significant resource needed to transform this long-polluted and vacant site into a major health care facility, as the site is assessed and characterized, is fully served by infrastructure, and is slated for redevelopment with resources from the private sector health institution. While some additional soil characterization will be conducted as part of the site's remediation under the state VRP to

determine the precise volume of soils to excavate and remove, this can be handled through the remediation grant requested here, or via the resources below. To the extent more resources are unexpectedly needed, HADCO has ready access to available resources for (i) assessment; (ii) remediation; and (iii) reuse:

Name of Resource	For Assessment, Remediation, or Reuse?	Secured or Unsecured?	Additional Details or Information
WV Region II Planning and Development Council	Assessment	Secured	Current EPA Brownfields Assessment grantee and HADCO partner, see attached letter.
WV Department of Environmental Protection	Assessment	Secured	Current EPA Brownfields Assessment grantee
City of Huntington, WV	Remediation	Secured	Current EPA RLF Fund, partner of HADCO
WV DEP	Remediation	Secured	Current EPA RLF Fund
Private Healthcare Provider	Reuse	Unsecured	Private entity agreed to provide resources reuse

iv. Use of Existing Infrastructure

The site is located near a major transportation artery within Huntington’s Highlawn Neighborhood where new redevelopment projects are occurring. With the area’s extensive industrial and commercial past and current use, infrastructure components are already in-place for future growth, including three-phase electric, commercial natural gas, and water & sewer services in good condition with sufficient excess capacity. High-speed broadband is available in the immediate area. Streets and sidewalks are maintained and in good condition for safe vehicular, biking and walking modes of travel. Storm water management including retention methods that promote water quality is in-place with City Code Ordinances for future site developments. No major infrastructure improvements are needed to redevelop the site, and the project will fully facilitate the use of existing infrastructure.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**a. Community Need**

i. The Community’s Need for Funding

Huntington remains the poorest city in the third poorest state in America. Huntington’s population has seen considerable decline since the 1950s. Today it stands at 45,746, a 46% decline over the last 70 years (U.S. Census estimates for 2022). Multiple factors contributed to this decline but the extensive, sustained decrease of the coal sector and the manufacturing industries over the years are responsible for the lion’s share of its current decay. The deterioration has been steady and persistent, growing over the course of decades; leaving in its wake a swath of empty businesses, closed factories and abandoned properties mixed among once thriving neighborhoods of the Highlawn area. Throughout this decline, residents with means and options left, but many did not have that choice. Some residents chose to stay and remain in their community. The detrimental effect on Huntington is still evident with **30.2%** of residents living in poverty compared to the national rate of 11.5% (U.S. Census Quick facts, 2022). In Census Tract 4 where the project site is located, 38% of residents are living in poverty which is more than three times higher than the national rate. The median household income for Huntington residents is \$34,351, less than half the national average of \$69,021 (U.S. Census Quick Facts, 2022). Per capita income is also much lower than national levels; at \$24,862 for Huntington compared to \$37,638 for the U.S.

Beyond the impacts on its residents, maintaining municipal services in a city built to support a population twice its current size drains available resources quickly. Despite best intentions, the city doesn’t have any additional resources to proactively address the sites on its own, which is why this funding is needed. In addition, the State of West Virginia does not offer any state-based grant programs or other financial support solely for the purpose

of environmental cleanup and/or the redevelopment of brownfield sites. This funding provides an avenue to address the redevelopment of the site despite the challenges faced at the local and state level.

As the population continues to stabilize, Huntington officials realized the only way to reverse the downward trend is to address the issues plaguing the city head on. For nearly 10 years, focused efforts like H-BIZ have assessed, remediated and planned for the redevelopment of blighted properties throughout the city. Several former brownfield parcels are now in various stages of redevelopment, paving the way for improved economic conditions and a cleaner environment. This grant will continue the inertia of Huntington's efforts by continuing to improve human health, clean up the local environment, remove blight, and stabilize the Highlawn Community.

## ii. Threats to Sensitive Populations

Huntington has a significant population of marginalized residents who disproportionately experience adverse health and life outcomes. These are the most vulnerable residents of the city and include ***low-income individuals and the working poor***. Huntington's current unemployment rate is 4.5%, which is nearly 20% higher than the national average (Bureau of Labor Statistics) and, according to EPA's EJ Screen Tool, Huntington is at the 97<sup>th</sup> percentile for low income individuals. Being low-income is directly correlated with various adverse health outcomes, including shorter life expectancy, higher infant mortality rates, and higher death rates for the 14 leading causes of death. Furthermore, growing up in a low-income household can greatly influence a child's health and cognitive development. ***Children under 5*** constitute around 5% of Huntington's population and EJ Screen reveals that multiple survey tracts within a one-mile radius of the project site are in the 83<sup>rd</sup> percentile and above for population of young children. In Highlawn, 50% of children live in poverty. This extreme economic hardship in Huntington negatively affects how a child's body and mind develop and alters the fundamental structure of their brain. Children who directly or indirectly experience risk factors associated with poverty and pollution have a higher likelihood of experiencing poor health outcomes as adults like heart disease, hypertension, stroke, obesity, certain cancers, and shorter life expectancy. Beyond these adverse health outcomes, the overall chance that children in these conditions grow up to graduate high school or and attain a skill or vocation is also reduced. In these census tracts, residents with ***less than a high school education*** range from the 80<sup>th</sup> to 90<sup>th</sup> percentile. A poorly educated populace is also correlated with adverse health outcomes, exacerbated by limited job prospects, low wages, and poverty contributing to a vicious cycle that traps subsequent generations.

In close proximity to the project site are numerous census tracts where the ***over age 64*** population ranges from the 60<sup>th</sup> to the 90<sup>th</sup> percentile nationally. This subgroup is the largest vulnerable population in Huntington, accounting for 16.5% of the population, slightly lower than the WV rate of 19.4%, and similar to the nation's elderly population segment of 16.9%. Additionally, 11% of Huntington senior citizens have an annual income of less than \$10,000 and 39% less than \$20,000. Other sensitive populations in this part of Huntington include a significant presence of ***unemployed*** residents. The Climate and Economic Justice Screening Tool (CEJST) reveals that the ***Unemployed population*** ranges from the 70<sup>th</sup> up to 97<sup>th</sup> percentile along several census tracts throughout the city. These individuals tend to suffer from stress-related illnesses such as high blood pressure, stroke, heart attack, heart disease, and arthritis at higher rates compared to those employed. In addition, experiences such as perceived job insecurity, downsizing or workplace closure, and underemployment also have implications for physical and mental health (US Dept. of Health and Human Services).

Census Tract 4 is also considered to be disadvantaged according to CEJST. The tract is in the 92<sup>nd</sup> percentile for proximity to hazardous waste facilities, illustrating the urgency to clean and redevelop this vacant brownfield property. Beyond this, the number of households below 100% of the federal poverty level is at the 99<sup>th</sup> percentile. These environmental risk factors and high rates of poverty compound and negatively affect residents, contributing to declines in health and their livelihoods. This is illustrated by the low life expectancy of the area at the 98<sup>th</sup> percentile, and a high share of residents diagnosed with asthma at the 96<sup>th</sup> percentile.

### *(1) Health or Welfare of Sensitive Populations*

Marginalized residents of the Highlawn area and Huntington in general will benefit directly from this redevelopment project. Plans include the construction of a new specialized transitional healthcare facility which bridges acute care and post-acute care. Transitional healthcare facilities offer supportive services and care for patients who have undergone surgery or experienced a severe illness that requires additional nursing and rehabilitation. The new facility will employ nearly one hundred individuals in highly skilled fields such as nursing, therapists, social workers, activity specialists, nursing assistants, nutrition specialists, as well as office and other clerical support staff. New quality jobs will benefit the marginalized residents of the Highlawn area, improving the employment prospects for ***low-income individuals*** and the ***unemployed population***. Additionally, increasing the job density of the local employment market will have a positive effect on the average wages of the area. Lifting vulnerable groups out of poverty benefits the whole community.

Furthermore, this healthcare facility will provide more favorable healthcare outcomes for the population ***over age 64*** who may be living without the support of family. Family members often ensure that older patients are eating well, getting exercise, and taking their medications as prescribed – all actions that can go a long way toward preventing and managing illness. In Highlawn, 30% of elderly residents live alone, leaving them vulnerable to poor health outcomes if they do not have support to care for them, so this facility could offer critical healthcare resources for local elderly community members.

### *(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions*

In 2008, the Associated Press, using data from the Centers for Disease Control and Prevention, named Huntington the “fattest and unhealthiest city” in the United States. The region had the highest obesity rate in the country at 49%, along with the highest rates for diabetes and heart disease. While Huntington is no longer deemed the “fattest and unhealthiest city” in the United States, statistics prove that there is room for continued improvement. Census Tract 4 ranks in the ***60<sup>th</sup> percentile for heart disease***, with the adjoining tracts in the 80<sup>th</sup> and 90<sup>th</sup> percentiles. Tract 4 and all adjoining tracts also rank in the 85<sup>th</sup> to 98<sup>th</sup> percentile for Asthma, likely attributed to the elevated particulates from industrial processes. Incidents of Cancer range from the 74<sup>th</sup> to the 90<sup>th</sup> percentile for tracts within a one-mile radius of the project site. According to the National Cancer Institute, Cabell County has an Incidental Rate for all cancers of 507.5 per 100,000 compared to the national rate 442.3 per 100,000. Cancer rates in Cabell County are almost 10% higher than the average for West Virginia, yet the average for West Virginia is still among the highest in the United States. The site reuse plan will facilitate the reduction of threats to the population in the target areas who experience elevated levels of heart disease, asthma, and cancer, which could be associated with exposure to the carcinogens, arsenic and polycyclic aromatic hydrocarbons found at the site.

### *(3) Environmental Justice*

***a. Identification of Environmental Justice Issues*** – The statistics paint a disturbing situation that is confirmed by the blighted properties dotting the Highlawn landscape, where the percentage of non-white people is over 25% higher than the state level. Residents have traditionally lived, worked, and played in the areas closest to contaminants, including the long-time use of the target property as a practice field for high school and college students. The neighborhoods that flanked the industrial engines of economic activity have fallen into various states of neglect, giving rise to cyclical conditions that negatively impact populations present in Highlawn area. EJ Screen reveals several Environmental Justice indices exceeding the 70<sup>th</sup> percentile at Tract 4 and the surrounding tracts. Particulate matter ranks at the 71<sup>st</sup> percentile while several indices exceed the 80<sup>th</sup> percentile, including hazardous waste proximity, proximity to underground storage tanks, and toxic air releases. Indices for the release of cancer risk air toxins and air toxics respiratory exceed the 90<sup>th</sup> percentile for residents.

***b. Advancing Environmental Justice*** – The project advances environmental justice on two fronts. The first is to control and/or manage existing pollution at the project site. This will involve the complete removal of soil contaminated with arsenic and PAHs as outlined in the Phase 2 ESA. Redevelopment of the site with a commitment to transition to less polluting economic drivers will mitigate the unjust environmental risks to the

sensitive populations associated with the heavy industries that have dominated much of Huntington's history, promoting improvement of both the environmental and socioeconomic conditions of the Highlawn neighborhood and the city.

## **b. Community Engagement**

### **i. Project Involvement**

Multiple civic groups and community organizations are playing important roles within the project. All are in Huntington with the majority located within the Highlawn Community itself. These groups have been, and will continue to help guide the process of redevelopment and revitalization of the property:

### **ii. Project Roles**

<b>Project Partner</b>	<b>Contact Information</b>	<b>Project Responsibility</b>
City of Huntington	Mayor Steve Williams, (304) 416-5656	Brownfield leader for the community
Highlawn Neighborhood Association	Linda Blough, President (304) 730-0988	Community interaction assistance, site reuse input
Highlawn Community Alliance	Zane Parsley, President (304) 412-3602	Community interaction assistance, site reuse input, placemaking, support for health sector
New Baptist Church	Trent Eastman (304) 523-3355 newbaptist2008@gmail.com	Venue for public meetings, information dissemination to Church members and the local area
Huntington First Church of the Nazarene	Trevor Lanz, Pastor (740) 552-1058	Site reuse input, local community interaction, local meeting space
WV Brownfields Assistance Center	George Carico, Director (304) 696-5456	Technical assistance, community engagement
WV Department of Environmental Protection	Jackson Porter (304) 951-7527	Technical assistance, WVDEP compliance assistance

### **iii. Incorporating Community Input**

HADCO will use the Highlawn Neighborhood Association's regularly scheduled monthly meeting as the primary method for obtaining community input and dissemination of project information. Meetings are held in the evening on the 1<sup>st</sup> Tuesday of each month and offered with a virtual option upon request. The project will be an ongoing agenda item and placed on the agenda every quarter. All questions, comments and concerns pertaining to this project will be recorded, with answers provided in a timely manner, normally responding by the next meeting date. This will provide equal access for input to all residents, including the underserved communities of the Highlawn area. HADCO will facilitate the quarterly updates and lead discussions regarding the project. A Project Summary Information Sheet has been developed and will be updated throughout the duration of the project on an as-needed basis to keep the community up to date on project advancements. All written correspondence will be in English, as 100% of the local area uses English as a primary language. Additionally, HADCO will also facilitate quarterly communication with the other listed project partners on an as-needed basis but will provide each partner a Project Summary Information Sheet every quarter until the project is completed.

## **3. TASK DESCRIPTIONS, COST ESTIMATE, AND MEASURING PROGRESS**

### **a. Proposed Cleanup Plan**

The site will be entered into WVDEP's Voluntary Remediation Program (VRP). As required by the VRP program, the following activities will occur: removal of contaminated surface soils for disposal in regulated facilities, installation of 7 groundwater monitoring wells with a minimum of 8 rounds of groundwater sampling over a 2-year period, and compilation of final reporting and obtaining a Certificate of Completion from the WVDEP. Storm water management elements to control runoff and reduce infiltration to groundwater, thereby reducing residual



contaminants impacting groundwater at the site, are also included in this cleanup plan. The project is anticipated to be completed over a 4-year period.

**b. Description of Tasks / Activities and Outputs**

<b>Task / Activity 1: Project Management and VRP Preparation</b>
<p>i. <b>Project Implementation:</b></p> <ul style="list-style-type: none"> <li>• <b>EPA Funded Tasks / Activities:</b> Project management, cooperative agreement completion, and all required reporting will be conducted by HADCO staff. A WV Licensed Remediation Specialist (LRS), required for any property in WV entering the VRP, will be hired through a competitive bid and State-approved process to oversee project activities. The LRS hired will have experience in EPA Brownfields cleanup projects. This task also includes required Pre-Application and Project Kick-off meetings with the WVDEP, VRP Application submittal, Site Assessment Work Plan (SAWP) Compilation, ABCA finalization, and WVDEP involvement for VRP guidance and approvals. Assessment, Cleanup and Redevelopment Exchange System (ACRES) data entry and updating will be conducted. HADCO representatives will also attend at least one national and two state brownfields conference events. Public meetings will be held quarterly throughout the 4-year project timeframe for project updating, discussion of any issues or concerns, and public input.</li> <li>• <b>Non-EPA Grant Resources Needed to Carry Out Tasks / Activities:</b> HADCO anticipates administrative costs will exceed the budgeted amount. HADCO will utilize operating resources for personnel to complete additional work related to administrative and meeting activities.</li> </ul>
ii. <b>Anticipated Project Schedule:</b> Year 1 / Month 1 through Year 4 / Month 1248
iii. <b>Task / Activity Lead:</b> Adam Phillips / HADCO, with LRS input
iv. <b>Outputs:</b> Procure LRS, 16 quarterly reports, 16 financial status reports, 1 VRP application, 16 quarterly meetings, finalized ABCA, 1 SAWP, participation in 3 brownfields conference events.
<b>Task / Activity 2: VRP Activities</b>
<p>i. <b>Project Implementation:</b> The LRS will oversee completion of required VRP reports, including a VRP Supplemental Site Assessment Report, Human Health &amp; Ecological Risk Assessment Report, and Remedial Action Work Plan (RAWP). Field Activities will include contaminated soil excavation and disposal at a regulated landfill and confirmatory soil sampling.</p>
ii. <b>Anticipated Project Schedule:</b> Year 1 / Month 4 through Year 2 / Month 12
iii. <b>Task / Activity Leads:</b> LRS, with HADCO input
iv. <b>Outputs:</b> 1 VRP Site Assessment Report, 1 Risk Assessment Report, 1 RAWP.
<b>Task / Activity 3: Groundwater Monitoring and Storm Water Management</b>
<p>i. <b>Project Implementation:</b> The LRS will oversee installation of 7 groundwater monitoring wells, groundwater sampling and associated monitoring and modeling to meet VRP requirements, and subsequent reporting. VRP requirements include a minimum of 8 quarterly rounds (4 rounds per calendar year) of groundwater sampling. Storm water management elements to control storm water runoff and reduce groundwater migration of residual contaminants includes installation of catch basins and storm water temporary holding tanks.</p>
ii. <b>Anticipated Project Schedule:</b> Year 1 / Month 7 through Year 4 / Month 6
iii. <b>Task / Activity Lead:</b> LRS, with HADCO input
iv. <b>Outputs:</b> Installation of 7 groundwater monitoring wells, 1 Groundwater Monitoring and Modeling Report, installation of storm water management system.
<b>Task / Activity 4: VRP Completion</b>
<p>i. <b>Project Implementation:</b> The LRS will Submit a VRP final report and Certificate of Completion details to WVDEP for approval, provide report revisions and associated closeout project information.</p>
ii. <b>Anticipated Project Schedule:</b> Year 4 / Month 1 through Year 4 / Month 12
iii. <b>Task / Activity Leads:</b> LRS, with support from HADCO

iv. **Outputs:** Land Use Covenant and/or Engineering and Institutional Controls document, Remedial Action Completion Report, Final VRP Report, VRP Certificate of Completion, Remediation of 7.18 acres of brownfield property for new development.

**c. Cost Estimates**

The table below provides cost estimates of each task / activity to be conducted, followed by a detailed breakdown of each task / activity. Cost estimates have been compiled using information from Qualified Environmental Professionals and Environmental Contractors, experienced LRS's, and "EPA Interim General Budget Development Guidance for Applicant and Recipients of EPA Financial Assistance Guidelines" document. More than 50% of projected costs are considered construction; all contractual and construction costs have been placed in the "Construction" category.

Budget Categories		Project Tasks / Activities and Totals (\$)				
		1-Project Management/VRP Prep	2-VRP Activities	3-Groundwater Monitoring & Stormwater Management	4-VRP Completion	Total
Direct Costs	Personnel	\$18,240				\$18,240
	Fringe Benefits					
	Travel	\$3,000 <sup>1</sup>				\$3,000
	Equipment					
	Supplies					
	Contractual					
	Construction	\$7,625	\$114,300	\$203,676	\$5,500	\$331,101
	Other	\$5,000	\$25,150			\$30,150
<b>Total Direct Costs</b>		<b>\$33,865</b>	<b>\$139,450</b>	<b>\$203,676</b>	<b>\$5,500</b>	<b>\$382,491</b>
Indirect Costs						
<b>Total Budget</b>		<b>\$33,865</b>	<b>\$139,450</b>	<b>\$203,676</b>	<b>\$5,500</b>	<b>\$382,491</b>

Travel<sup>1</sup> (travel to 3 Brownfields Conference Events)

**TASK 1: PROJECT MANAGEMENT AND VRP PREPARATION:**

**Personnel Costs:** 10 hours per month, 480 hours total, average rate of \$38.00/hr.; **Total \$18,240**

HADCO personnel will be responsible for project supervision, ACRES updating, quarterly reporting, and all financial reporting required. Note: HADCO will provide meeting supplies and expenses (Includes paper for meeting handouts and project fact sheets, printing costs, presentation materials, media cost and public meeting expenses) at no charge to the grant.

**Travel Costs:** Project representative attending 1 National EPA Brownfields Conference and 2 State Brownfields Conferences (3 events, \$1,000 average cost per event); **Total \$3,000**

**Construction:** LRS labor for VRP Application, SAWP, 58 hours at \$125 per hour, \$7,250; vehicle travel costs, 3 days at \$125 per day, \$375; **Total \$7,625**

**Other:** WVDEP Application fee for VRP submittal, lump sum; **Total \$5,000**

**TASK 2: VRP ACTIVITIES:**

**Construction Costs:** LRS / Project Manager and Field Supervision including soil excavation activities, completion of SAWP, Risk Assessment, and RAWP, quarterly meeting attendance (16 meetings), 180 hours

total at average rate of \$125.00/hr., \$22,500; Soil Excavation and Disposal - estimate 500 tons landfilled at \$45 per ton, \$22,500; transport of 500 tons of soils to landfill at \$30 per ton, \$15,000; 500 tons of backfill at \$30 per ton, \$15,000; transport of 500 tons backfill at \$15 per ton, \$7,500; excavation equipment, 5 days at \$2,500 per day, \$15,000; Equipment mobilization and demobilization, \$1,500; Field Supervisor, 5 days at \$1,500 per day, \$7,500; Extended Assessment and Confirmatory Sampling (arsenic, VOC's, PAC's, benzo(a)pyrene, benzo(b)fluoranthene, laboratory sustainability fee, includes Level IV Data Package), 26 samples at \$300. per sample; \$7,800; **Total \$114,300**

Other: WVDEP VRP costs for Review/approval of SAWP and RAWP, split sampling analysis, 3 samples at \$800 per sample, \$2,400; review/approval of SAWP and RAWP, Risk Assessment, Project Manager/Toxicologist/hydrogeologist, 130 hours labor at \$175 per hour, \$22,750; **Total \$25,150**

### **TASK 3: GROUNDWATER MONITORING and STORM WATER MANAGEMENT:**

Construction Costs: Install Groundwater Monitoring Wells (7 x \$3,200 average), \$22,400; Field Supervision / LRS labor / Report Labor, 442 hours at \$125 per hour, \$55,250; vehicle travel costs, 14 days at \$125/ day, \$1,750; Analytical costs, 8 rounds of groundwater sampling at \$1,527/ round, \$12,216; Groundwater sampling supplies and monitoring equipment, 14 days at \$290/ day, \$4,060; Analytical Data Validation Report, \$3,000 lump sum; Stormwater Management Controls including site preparation, catch basin & temporary holding tank installations estimated at \$15,000 per acre (~7 acres total), \$105,000; **Total \$203,676**

### **TASK 4: VRP COMPLETION:**

Construction Costs: Final VRP Report and Certificate of Completion, LRS / Project Manager / Report Labor, 44 hours at \$125 per hour; **Total \$5,500**

#### **d. Plan to Measure and Evaluate Environmental Progress and Results**

HADCO will include an agenda item at each quarterly public meeting to review project progress and take corrective actions when necessary to ensure the project is completed and brownfields funding is expended within the 4-year project timeframe. Quarterly meetings, utilizing both virtual and in-person options, will include reviewing community priorities and addressing community concerns. Quarterly Reports, MBE/DBE and financial reporting will be submitted in a timely manner to EPA throughout the 4-year project timeframe, detailing outputs and outcomes of the project. Site information will be updated as needed in the ACRES database. Outputs to track include the number of public meetings conducted, number of required VRP reports completed, and site cleanup completion. Outcomes to track include level of community participation (number of attendees, response, and interaction levels, etc.), acreage remediated for reuse, and redevelopment and related project funding leveraged.

## **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

### **a. Programmatic Capability**

#### i. Organizational Structure, ii. Description of Key Staff

HADCO is an Accredited Economic Development Organization through the International Economic Development Council and is designated as the lead economic development agency for Cabell and Wayne Counties in WV. HADCO is a 501(c)3 nonprofit organization with a 33-member board of directors and an average annual operating budget of \$450,000. HADCO has three paid staff: David Lieving is the President and CEO, managing day-to-day operations, Adam Phillips is Business Development Specialist performing business outreach, and Donna Vineyard is executive assistant and directly manages finances and records for the organization.

Grant activities for the project will be managed jointly by Mr. Lieving and Mr. Phillips. Mr. Lieving has more than 30 years of experience in economic development serving as President of HADCO for the past 8 years and in various roles in the West Virginia Department of Economic Development for 25 years prior to that. Mr. Lieving will primarily manage the implementation of funding for the cleanup of the site, including procurement of vendors

and payment of invoices. Mr. Phillips has more than eight years of economic development experience, serving 6 years in his current role at HADCO and as Asset and Site Development Manager for the Southern Ohio Port Authority for two and half years previously. Mr. Phillips has experience managing EPA Brownfield Assessment Grants at both the Southern Ohio Port Authority and as grant administrator for the Wayne County Economic Development Authority (WCEDA), for which HADCO has been responsible since July 2021. WCEDA is currently in the final year of a \$200,000 EPA Assessment Grant. Mr. Phillips will manage all the reporting for this grant including submittal of quarterly progress reports and required ACRES reporting. Additional grant management support ensuring timely grant compliance and expenditure of funds will be provided through the WV Brownfield Assistance Center at Marshall University and through coordination with the City of Huntington.

### iii. Acquiring Additional Resources

HADCO will hire a WV licensed groundwater monitoring well installer, a WV Licensed Remediation Specialist (LRS) experienced in contaminated soil and ground water projects, as well as experienced excavation and transport contractors. All third-party vendors will be hired in accordance with Competitive Procurement Standards 40 CFR Part 31.36 and in accordance with HADCO's own purchasing and procurement procedures. No additional resources will be required. Support from the WV Brownfields Assistance Center is always available.

## **b. Past Performance and Accomplishments**

### i. Currently Has or Previously Received an EPA Brownfields Grant

HADCO currently manages an EPA Brownfields Assessment Grant as part of its management of WCEDA. HADCO took over management of this grant in 2021 and has expended \$94,431.26 in grant funds to date. Project advancements have been slow due to a variety of factors including a general slowdown in economic development and reuse projects from the COVID-19 pandemic. Project activity has increased significantly in 2023 and we are confident that we will be able to spend down the remaining funds on three highly impactful projects that we have identified and are currently making serious progress toward initiating.

#### *(1) Accomplishments*

*-Phase I and Phase II Environmental Assessment Projects* – Through the EPA Brownfield Assessment Grant we have successfully completed Phase I ESAs on nine individual projects and Phase II assessments on one additional project. We have completed Phase I assessments on the Carey Concrete Site, Former Kenova Elementary Site, Former Thompson Elementary Site, Heritage Farm & Museum Site, Hope Nation Site, Lowe Property Site, Prichard Intermodal Facility Site, Ross Property Site and Sullivan Property Site. We completed an additional Phase II ESA on the Heritage Farm & Museum Site. Three of these projects have stimulated property acquisitions or significant new on-site investment.

*-Site Planning Assessments* – Through the EPA Brownfield Assessment Grant we have successfully completed one site redevelopment planning project at the Prichard Intermodal Facility along with the Phase I ESA. This site planning work helped to successfully resurvey the floodplain on the property and to submit a letter of map revision (LOMR-F) to FEMA in order to adjust the floodplain status on said property. This adjustment helped to secure a viable commercial tenant for this long-underutilized piece of property in rural Prichard, WV. This new development is estimated to create at least 15 new full-time positions and substantial capital investment on the property.

#### *(2) Compliance with Grant Requirements*

*- EPA Brownfield Assessment Grant, WCEDA* – HADCO is current and up-to-date on all required project reporting, including financial and ACRES reporting for this grant. Expenditure of funds has been slower than projected but is advancing and expected to be expended within the current grant timeframe. Community outreach via coordination with a robust community brownfield steering committee has been consistent and ongoing.

## EPA Cleanup Grant Application Threshold Criteria- HADCO

Former Huntington East Practice Field, Huntington, WV

1. Applicant Eligibility – Huntington Area Development Council (HADCO) is a private, nonprofit tax-exempt organization having been granted tax exempt status by IRS Code 501 (c)(3) and is registered in the State of West Virginia.
2. Previously Awarded Cleanup Grants – HADCO affirms that the site has not had a previously awarded EPA Brownfields Cleanup grant.
3. Expenditure of Existing Multipurpose Grant Funds – Not applicable; HADCO affirms it does not have an open EPA Brownfields Multipurpose grant.
4. Site Ownership –HADCO officially took ownership of the property from the Cabell County School Board of Education on March 21, 2022.

5. Basic Site Information:

Site Name: Former Huntington East Practice Field Site

Site Address: 7th Avenue and 29th Street Huntington, West Virginia 25702

Tax Parcels: 05-21-9.2 and 05-21-9.3

6. Status and History of Contamination at the Site –The Former Huntington East Practice Field Site has documented hazardous substance contamination per the Phase II ESA completed by Triad Engineering, dated October 31, 2022. Triad Engineering collected three surface soil, six subsurface soil, and three groundwater grab samples which were analyzed for volatile organic compounds (VOC), PAH, RCRA 8 metals, and herbicides. The presence of numerous contaminants were found in the surface soil, subsurface soil and groundwater samples. Contaminants include arsenic, benzopyrene, trichloroethene, benzo anthracene, and naphthalene.

This 7.18-acre site was undeveloped until approximately 1900, at which time a portion of railroad tracks ran through the southwestern portion of the Site. CSX occupied the Site from that time through approximately the early to mid-1970's. The site was then used as a practice field for Huntington East High School through the mid-1990's and for Marshall University's soccer and rugby teams until 2018. Two small storage sheds were constructed in 2000 and remain present at the Site. The Site is currently vacant.

Based on the results of this Phase II ESA, the impacts to soil at the site appear minimal and could be addressed with a Soil Management Plan during future redevelopment activities, or excavated and removed from the property. Laboratory analytical results revealed VOC and PAH exceedances in the groundwater screening samples collected at

the site. Although the specific source of the VOC and PAH are unknown, the contamination is likely from historical industrial activities at the Site. Triad recommended installation of constructed monitoring wells to perform multiple rounds of groundwater sampling to fully determine groundwater impacts, which will be required for this site to enter into the WVDEP's Voluntary Remediation Program.

7. Brownfield Site Definition –HADCO affirms that “the site is not listed or proposed for listing on the National Priorities List, is 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 is not subject to the jurisdiction, custody, or control of the U.S. government”.
8. Environmental Assessment – A Phase I ESA was completed by Triade Engineering September 22, 2021, and a Phase II ESA was completed October 31, 2022. Triad performed the Phase I and Phase II ESA investigation in strict accordance with the American Society of Testing and Materials (ASTM) Practice E 1903-19, Standard Practice for Environmental Site Assessments: Phase II Environmental Site Assessment Process.
9. Site Characterization – This site is eligible to be enrolled in the WVDEP's VRP. Attached is a letter from our West Virginia Department of Environmental Protection affirming the site is eligible for enrollment in the State VRP.
10. Enforcement or Other Actions – There are no known ongoing or anticipated environmental enforcement or other actions related to the site.
11. Sites Requiring a Property-Specific Determination –HADCO affirms that the site does not require a Property-Specific Determination to be eligible for Brownfields Grant funding.
12. Threshold Criteria Related to CERCLA /Petroleum Liability; Hazardous Substance Sites HADCO took sole ownership of the property on March 21, 2022, after completion of All Appropriate Inquiries, occurring within 180 days of property transfer. A Phase I Environmental Site Assessment was completed by Triad Engineering on September 22, 2021, for HADCO following ASTM E1527-13 guidelines. These actions qualify HADCO for “**Bona Fide Prospective Purchaser Liability Protection**” and qualifying the site for use of EPA Brownfields Cleanup grant funds.

HADCO took possession of the site as the result of a Deed of Gift conveyance from the Cabell County Board of Education, a political subdivision of the State of West Virginia, on March 21, 2022. Ownership of the site is fee simple. In addition to the completion of the Phase I ESA noted above, a Phase II ESA was completed by Triad Engineering on October 31, 2022, following ASTM E1527-13 guidelines. These reports were prepared

by Heather Metz, Environmental Manager and West Virginia Licensed Remediation Specialist (LRS) for Triad Engineering.

HADCO affirms it is not liable or responsible in any way for contaminations at the site. All disposal of hazardous substances at the site occurred before HADCO's acquisition of the property. HADCO has not arranged for the disposal of any hazardous substances at the site, nor has it transported any hazardous substances to the site. There are no known on-going hazardous releases of contaminants, nor no known exposure risks to site contaminants. The site remains vacant and is not in use nor has it been in use for any purpose while HADCO has had possession of the site. HADCO has maintained reasonable access controls to the site including locked access gates to the fenced property. No site work of any kind that would disturb contaminated soil or groundwater has been enacted while HADCO has had possession.

HADCO has no familial, contractual, corporate, or financial relationships or affiliations with the prior owner (Cabell County Board of Education). HADCO confirms our commitment to comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls; assist and cooperate with those performing the cleanup and provide access to the property; comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; provide all legally required notices; and not impede performance of a response action or natural resource restoration.

13. Cleanup Authority and Oversight Structure – The site will be enrolled into the WVDEP's Voluntary Remediation Program. For this site to be enrolled into the VRP, a West Virginia Licensed Remediation Specialist (LRS) must be hired. HADCO affirms that the LRS to be hired for this project will be hired through a State-approved procurement process. This process also complies with the provision set forth in 2 CFP 200.317 through 200.327.

Adjacent properties are not anticipated to be impacted or affected by this cleanup project. All cleanup activities are anticipated to take place on the property. In the event adjacent properties are involved, HADCO has already established relationships with these entities, including St. Mary's Medical Center and New Baptist Church.

14. Community Notification – A public notice was placed in the local newspaper (*The Herald Dispatch*) on October 27, 2023, and on November 3, 2023 notifying the public of the intent to apply for cleanup funding and to provide details on the public meeting related to the application. A copy of the ad is provided with this application and included required information on plans to submit an EPA Brownfields Cleanup grant. A draft application narrative and draft Analysis of Brownfield Cleanup Alternatives (ABCA) were made available (ABCA included with this application submittal) at the public meeting as well as during HADCO's normal office hours at its offices from November to November 10, 2023. The public meeting to discuss this application was held on

November 7, 2023. A sign-in sheet was provided at this meeting for all people attending publicly. The sign-in sheet and all comments received during the public meeting are attached as separate documents.

15. Contractors and Named Subrecipients – Not Applicable. HADCO has not procured contractors or consultants for this project.





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west virginia department of environmental protection

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Office of Environmental Remediation  
601 57th Street SE  
Charleston, WV 25304  
Phone: 304-926-0499

Harold D. Ward, Cabinet Secretary  
dep.wv.gov

November 2, 2023

Mr. Dave Lieving, President  
Huntington Area Development Council  
916 Fifth Avenue, Suite 400  
Huntington, WV 25701

RE: State Environmental Authority Acknowledgement Letter  
FY24 U.S. EPA Brownfields Cleanup Grant Application  
EPA-I-OLEM-OBLR-23-15

Dear Mr. Lieving,

Thank you for your continued efforts to further enhance the state's environment, economy, and quality of life by applying for an FY24 U.S. EPA Brownfields Cleanup Grant. The WVDEP acknowledges that the Huntington Area Development Council plans to conduct cleanup of the Former Huntington East Practice Field brownfield site located at 7<sup>th</sup> Avenue and 29<sup>th</sup> Street, Huntington, WV.

The WVDEP affirms that the Former Huntington East Practice Field site:

- i. Is eligible to be enrolled in the WVDEP Voluntary Remediation Program;
- ii. Is not currently enrolled in the WVDEP Voluntary Remediation Program, but the Huntington Area Development Council intends to enroll the site in the Voluntary Remediation Program; and,
- iii. Has a sufficient level of site characterization from the environmental site assessments performed to date for the remediation work to begin on the site. Note that remediation work can begin on sites that have enrolled in WVDEP's Voluntary Remediation Program at any time provided that WVDEP is notified in writing.

Additionally, should assessment needs arise in the future, funding may be available through WVDEP's current CWAGST Brownfields Assessment Grant to fund the additional site characterization. Also, should the site receive the Brownfields Cleanup Grant and if all funding is expended but additional remediation remains, funding may be available through WVDEP's Brownfields Revolving Loan Fund Grant to fund the additional remediation.

As you prepare your application for this funding, the WVDEP Office of Environmental Remediation is in full support of your efforts. We are committed to assist you throughout the remediation process at the Former Huntington East Practice Field site and look forward to future redevelopment.

Should you have any questions or needs, please do not hesitate to contact me at 304-951-7527.

Sincerely,

A handwritten signature in blue ink that reads "Jackson Porter". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

Jackson Porter  
Brownfields Specialist