

Narrative Information Sheet

1. Applicant Identification: New River Gorge Regional Development Authority

200 Main Street, Beckley, WV 25801

2. Funding Requested

a. Grant Type: Single Site Cleanup

b. Federal Funds Requested: \$500,000

3. Location: The brownfield property is located near the Town of Rainelle on Snake Island Road, Fayette County, West Virginia.

4. Property Information: Snake Island Road, Rainelle, West Virginia 25962 (Fayette County, New Haven District, Map 0084, Parcel 001)

5. Contacts:

a. Project Director: Andrew Davis, Director of Strategic Redevelopment

Phone: (304) 254-8115 Email: adavis@nrgrda.org

Mailing Address: 200 Main Street, Beckley, WV 25801

b. Chief Executive/Highest Ranking Elected Official:

Jina Belcher, Executive Director

Phone: (304) 254-8115 Email: jbelcher@nrgrda.org

Mailing Address: 200 Main Street, Beckley, WV 25801

6. Population: Population of Rainelle, WV is 1,190 (2020 U.S. Census)

7. Other Factors: NRGRDA is claiming the following other factors for the former Rainelle Landfill Site:

Other Factors	Page #
Community population is 10,000 or less	4
Secured firm leveraging commitment ties directly to the project and will	3
facilitate completion of the project/reuse; secured resource is identified in the	
Narrative and substantiated in the attached documentation.	
The proposed site is adjacent to a body of water (i.e., the border of the proposed	2
site is contiguous or partially contiguous with a body of water but for a street,	
road, or other public thoroughfare separating them.	



The proposed site is in a federally designated flood plain.	3	
The reuse of the proposed cleanup site will facilitate renewable energy from		
wind, solar, or geothermal energy.		
The reuse of the proposed cleanup site will incorporate energy efficiency	4	
measures.		
The proposed project will improve local climate adaptation/mitigation capacity	5	
and resilience to protect residents and community investments.		

8. Releasing Copies of Applications Not applicable, this application does not have confidential, privileged, or sensitive information.



NARRATIVE INFORMATION SHEET ATTACHMENT STATE LETTER

Former Rainelle Dump / Proposed Snake Island Recreational Area, Rainelle, Fayette County, WV New River Gorge Regional Development Authority

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i. Overview of Background Challenges and Description of Target Area

The target area lies within the scenic Meadow River Valley (MRV), which is located in the Alleghany Mountain section of the Appalachian Mountains in Nicholas, Fayette, and Greenbrier Counties in West Virginia (WV). This area has a long history of coal and timber extraction led by outside corporations with minimal or no continued investment in the communities that supported decades of profits. communities now consist of descendants of the workforce, many of which were immigrants, that powered a once vibrant economy. These descendants and other residents are left with the environmental justice and climate change issues (as demonstrated in the EPA Environmental Justice Tool (EJScreen) and Climate and Economic Justice Screening Tool (CEJST)) that are common among extremely rural, riverside communities that struggle to thrive following the downturn of the original industries that sparked their creation. The closest town to the target area, Rainelle, is located on the historic Midland Trail and was home to the Meadow River Lumber Company (MRLC), once the largest hardwood lumber mill in the world. The MRLC created the need for the Nicholas, Fayette, and Greenbrier (N,F,&G) Railroad, which transported timber and coal from the MRV to various locations throughout the world until the closing of the MRLC in the 1970s. Coal mining, primarily metallurgical coal for steel making, has experienced huge reductions, especially in the past ten years. While the region is still one of the highest coal-producing in the United States (U.S.), total output has dropped by ~51% in the past ten-year span (U.S. Dept. of Energy, 2021 statistics). As a result, approximately 40 miles of the railroad corridor was idled in the 1980s. Additionally, construction of Interstate 64 diverted traffic from the Midland Trail, which once was the main route between more populated cities in Ohio and Virginia. These struggles were exacerbated in 2016 by a tragic 1,000-year flood that resulted in the loss of twenty-four lives and devastated the infrastructure and communities within the MRV. Given these circumstances, multiple brownfield properties are scattered throughout the immediate area, including the former lumber mill and railroad, closed metal fabrication and welding shops, distribution facilities, and coal transport-related operations (rail and over-the-road loading and related facilities). Closed retail and commercial businesses also exist as a result of the extensive downturn in the coal and timber industries, as the local economy has plummeted.

However, the communities of the region have worked together with assistance from federal agencies, such as the EPA and FEMA since the flood to revitalize the MRV by focusing on the recreational assets that have been underutilized due to limited access. The idled N,F,&G Railroad is being redeveloped as the Meadow River Rail Trail (MRRT), which provides access to the Meadow River and the newly created Meadow River Recreational Corridor (MRRC). With the nation's newest national park (New River Gorge National Park and Preserve), as well as the Bluestone Scenic River and Gauley River Recreational Area, nearby ski resorts, and multiple state parks within a short drive, the MRV is poised to overcome historic decline by providing access to previously inaccessible areas for cross country skiing, hiking, rock-climbing, flat water kayaking, white-water rafting, camping, hunting and fishing. Visitors and outdoor enthusiasts from across the eastern and central U.S. can easily make the trip to the Meadow River to enjoy a multitude of activities, while the quality of life for the community members that live in the MRV can be dramatically improved. However, additional access to the Meadow River and access to land adjacent to the MRRT is critical to provide sufficient access to the recreational corridor.

1.a.ii. Description of the Proposed Brownfield Site

The specific site to be addressed is an approximately 4.826-acre site known as the former Rainelle Dump, located near Snake Island Road approximately 2 miles northwest of the Town of Rainelle. The former dump is located between the MRRT and the Meadow River, and is the only parcel that is currently

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available for redevelopment along the over 24-mile long MRRT. This facility operated until the 1970s as a municipal dump, used by the Town of Rainelle for landfilling of various waste materials, including household trash and various small business waste streams. Since closure in the 1970s, the site has remained closed and unused with the exception of occasional use of the property by the Town of Rainelle maintenance staff to burn woody debris. A Phase II Environmental Site Assessment (ESA) performed using EPA Brownfields Assessment funds in 2023 indicated environmental impacts found in various sections of the site. Site soils and groundwater include a variety of contaminants, including heavy metals and polycyclic aromatic hydrocarbons (PAHs).

The New River Gorge Regional Development Authority (NRGRDA) took ownership of the property in 2023 to serve as developer of the site for development of the proposed Snake Island Recreation Area, which will provide necessary access to the MRRT and Meadow River. The Snake Island Recreation Area will also provide other recreational opportunities such as primitive camping and an outdoor educational area where visitors and local students can learn about the Meadow River Watershed, sustainability, renewable energy, and brownfields revitalization.

1.b. Revitalization of the Target Area

1.b.i. Reuse Strategy and Alignment with Revitalization Plans

The MRV communities have participated in the EPA Local Foods, Local Places Program, Federal Home Loan Bank of Pittsburg's Blueprint Communities Program, and organized trail town planning in partnership with USEPA, HUD, and FEMA. Redevelopment of the former Rainelle Dump site for multi-recreational use aligns with the region's strategic planning that was an outcome of these programs. These plans, compiled by local stakeholders including town leaders, local business owners, workers, and area residents, focus on strategic factors critical for economic development in the region. One component of this plan is Industry Cluster Development, and one of the industry clusters is "Travel Tourism", designed to bring more visitors to the region to enjoy outdoor recreational experiences. One major goal of this industry cluster development is "to preserve, and develop our many national attractions to generate additional tourism and travel to the region". Redevelopment of the former Rainelle Dump also aligns with development of the MRRC, which showcases the Meadow River and MRRT increasing outdoor recreational development and enhances the connection to the Gauley River National Recreation Area.

1.b.ii. Outcomes and Benefits of Reuse Strategy

Redevelopment of the former Rainelle Dump site will stimulate new economic development in recreational tourism, attracting new visitors to the area and region, and reduce impacts from climate change induced factors. Examples include elevation of the parcel via the addition of locally sourced cap material and stabilization of the streambank with native plantings and other sustainable measures, construction of river access, parking areas, and primitive camp sites. Currently, access to the MRRT, which has garnered over \$4 Million in investment, is very limited due to ownership of the adjacent properties by a large out-ofstate timber corporation. Additionally, only one public access to the Meadow River exists approximately four miles upriver from the former Rainelle Dump. The project team previously worked with the State of WV to construct an approximately \$250,000 river access point and another access at the former Rainelle Dump / proposed Snake Island Recreational Area will provide an ideal flat water kayak experience between the access points. The new access is also upstream of world-class whitewater. Development of the rail trail and water access is expected to generate up to 120 new jobs from ancillary businesses, up to \$3 Million in new tax revenues and related monies per year, and up to ten new businesses are projected. Investment has been hindered by concerns regarding climate change related increases in flooding. This project is designed to alleviate concerns and risk associated with the site being in a federally designated flood plain. The former Rainelle Dump site is a key site within this overall plan.

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1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Characterization

Extensive environmental assessment studies utilizing EPA's Brownfields Assessment grant program have been conducted. Additional site characterization is currently being performed using EPA Brownfields Assessment grant program funding will be used to complete site assessment activities. In the event of unforeseen circumstances resulting in additional site characterization requirements, the West Virginia Department of Environmental Protection (WVDEP) and Fayette County Commission (FCC) have stated they can provide funding through their current EPA Brownfields Assessment grants for additional site assessment

1.c.ii. Resources Needed for Site Remediation

Based on extensive environmental assessment information and site condition reviews by experienced environmental professionals, NRGRDA believes that the funding requested in this application will be sufficient to complete all required remediation activities on the proposed brownfield site. Contaminated soil volumes have been calculated based on previous assessment activities, and projected costs for excavation, transport, and disposal of highly contaminated soils, capping of remaining contaminated soils, and related project activities have been compiled using experienced environmental professionals and contractors. In the event additional funding is required to complete remediation activities, the NRGRDA affirms it will obtain necessary funding. NRGRDA has interacted with the WVDEP, who has stated funds from their current EPA Brownfields Revolving Loan Fund program would be available for this project, if warranted.

1.c.iii Resources Needed for Site Reuse

The NRGRDA, as a recognized entity of the State of WV, is eligible for all major categories of federal, state, and private funding sources. These funding sources don't include funding specifically for conducting environmental remediation, which is critically needed on the former Rainelle Dump site. Full remediation of the site will be required before other funds can be acquired for site redevelopment. Funding sources available to augment this project are available from various entities. A significant federal example available specifically to the region is the Appalachian Regional Commission, which has Fayette County listed as an "at-risk" county for economic distress. NRGRDA intends to apply for up to \$2 Million from this Commission for recreational development planning and construction projects. A major State partner is the Recreational Trails Program within the WV Department of Transportation. This Program provides funds, often up to \$500,000 per project, for non-motorized trail development and associated trail needs (parking, signage, etc.). The WVDOT has repeatedly invested in the Meadow River Rail Trail, is aware of this recreational project, and is interested in future funding support for expanding and connecting trails in the area. The Abandoned Mine Lands Reclamation Program also provides funding for economic redevelopment and has awarded over \$1.8 Million to the MRRT project. NRGRDA will partner with the FCC to use their EPA Brownfields Assessment Grant funding for site reuse planning and we anticipate being able to leverage an additional \$20,000 to \$40,000 for site planning use from local philanthropic organizations.

1.c.iv. Use of Existing Infrastructure

The site is located in a rural area outside of the Town of Rainelle. However, there is extensive interest in and use of the adjacent MRRT and Meadow River. The former Rainelle Dump has a roadway easement that provides access to the trail, river, and the proposed Snake Island Recreational Area. Utilities do not currently exist at the site. Due to the interest in sustainability education, the site will be used as a demonstration of innovative technologies, such as solar and wind, to generate electricity for the facility. A host of natural stream channel design techniques will be employed to mitigate the severity and impact of severe flooding and erratic flow regimes brought about by climate change.

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2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

2.a.i The Community's Need for Funding

Rainelle has lost over 37% of its population since the 1980's, currently at 1,190 (U.S. Census, 2020). Multiple factors have contributed to this population loss, including the extensive decrease in the timber industry, metallurgical coal mining and mining support industry jobs (railroad, metal fabrication, equipment suppliers, etc.), combined with modernization of the timber and coal mining industries that have resulted in fewer workers needed for mining and processing. These job losses and associated economic declines has resulted in a 5-year poverty rate of 19.9% for Fayette County, higher than the State's rate of 17.9% and 40% above the national rate of 11.5% (U.S. Census Quickfacts, 2022). Median Household income is only \$45,988, 10% below the State average, and over 33% below the national average of \$69,021 (U.S. Census Quick Facts, 2022). Per capita income is also much lower than national levels; at \$22,677 for Fayette County compared to \$37,638 for the U.S., a 40% lower rate. A reduced population combined with the loss of high-paying mining jobs has resulted in reduced taxes available for Rainelle and Fayette County to provide expected services. Currently, WV does not offer any state-based grant programs solely for environmental cleanup and redevelopment of brownfield sites. Rainelle and Fayette County, due to extensive tax revenue decreases, with no decrease in City or County services, are not in a current position to set aside funding specifically for cleanup of the site.

2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

The largest sensitive and most vulnerable population in Rainelle and Fayette County is the elderly. The County's residences 65 years old and older is 23.2% of the population. This rate is similar to the WV rate of 21.2%, yet over 25% higher than the nation's elderly population segment of 17.3%. One major problem facing the elderly population in Fayette County is the lack of quality health-care facilities. According to data from the U.S. Health Resources & Services Administration, the county's elderly population, combined with its low-income levels and limited primary care providers, are primary factors designating three sections of Fayette County, including areas around the subject site, as "Medically Underserved Areas".

Additional studies indicate elderly populations are at a much higher risk of developing major health issues including cancer when compared to other population segments. According to studies from Johns Hopkins, in elderly populations over the age of 65, there is "an 11-fold increased incidence of developing cancer as compared to younger individuals". This study also states "cancer-related mortality has increased among the older population by 15%, compared to a 5% decrease in individuals less than age 65". (data from John Hopkins Medicine, hopkinsmedicine.org/gec/series/cancer aging). Most of the contaminants on the former Rainelle Dump site are classified by EPA as "known" or "probable" cancer causing contaminants. Elimination of these contaminants from public exposure will help address the high cancer rates in the area.

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

Cancer rates in WV are overall much higher than the national average. WV has the second highest age-adjusted lung cancer rate in the U.S., 50.8 per 100,000, compared to the national average of 34.8 (Nat. Center for Health Statistics, Nat. Vital Statistics System). The State also has the highest rate for new lung cancer cases, recorded at 80.1 per 100,000, compared to the U.S. rate of 58.7 (American Lung Association). In Raleigh County, high cancer rates are also higher than average. As an example, the county has a cancer death rate of 187.7 per 100,000, higher than the national cancer death rate of 146.2 (National Cancer Institute, 2019 data). Multiple contaminants present at the former Rainelle Dump are known to cause, or likely to cause, cancer. Heavy metals including arsenic and cadmium, at levels more than 5 times allowable

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standards, are classified by the International Agency for Research as Group 1 carcinogens. Aroclor 1254 and 1260, at levels 3 times allowable limits, are classified by EPA as "probable human carcinogens". Many of the polycyclic aromatic hydrocarbons, petroleum compounds, and chlorinated solvents present, some at more than 5 times allowable standards, are known cancer causing compounds ("Environmental Contaminants Often Found at Brownfield Sites", EPA Brownfields Program, May 2020).

(3) Environmental Justice

3(a) Identification of Environmental Justice Issues

All residents, regardless of age, race, color, ethnicity, or income are entitled to equal protection from environmental and health hazards and equal access to the development, implementation, and enforcement of environmental laws, regulations, and policies. The EJScreen revealed the following sensitive populations in Rainelle, West Virginia (WV), as well as the surrounding Fayette and Greenbrier Counties, WV: Low income, people of color, individuals with less than a high school education, and individuals with disabilities. The low-income population in Rainelle, WV (41%) places WV in the 71st percentile in the U.S. exceeding the state average of 57th percent. While people of color make up only 9% of the total population of WV, the immediate area surrounding the Former Rainelle Dump has people of color population of only 2%, in the 36th percentile in WV, and the 7th percentile in the US. The environmental justice tool revealed multiple sources of potential risk at or above the 50th percentile nationally, for Rainelle, WV, that likely pose additional burdens of risk on these sensitive populations including lead paint, and USTs. Furthermore, sources of potential risk at or above the 50th percentile nationally were revealed within Fayette County, WV (lead paint, USTs, and wastewater discharge) and Greenbrier County (lead paint, and wastewater discharge), culminating in an unfair burden of cost of societal conveniences.

According to information obtained from the CJEST, Fayette County, WV is not considered disadvantaged; however, Greenbrier County, WV where the Town of Rainelle is located, is considered disadvantaged due to the following indicator burdens and socioeconomic threshold exceedances: Climate change, health, legacy pollution and transportation. Greenbrier County is considered disadvantaged when considering the climate change indicator burden because the county is ranked above the 90th percentile for projected flood risk (Greenbrier County - 95th percentile), as well as above the 65th percentile for low income (Greenbrier County - 81st percentile). Greenbrier County is considered disadvantaged when considering the health indicator burdens because the county is ranked above the 90th percentile for diabetes (Greenbrier County – 91st percentile), and heart disease (Greenbrier County – 98th percentile), as well as being above the 65th percentile for low income as noted previously. When considering the legacy pollution burden, Greenbrier County is considered disadvantaged due to the presence of at least one (1) abandoned mine land, as well as being above the 65th percentile for low income. Lastly, Greenbrier County is considered disadvantaged when considering the transportation indicator burden due to being above the transportation barriers burden of 90th percentile (Greenbrier County – 98th percentile), as well as being above the low-income percentile of 65th.

While not all of the sources identified above will be directly addressed with completion of this project, remediation of the former landfill site will eliminate significant risks posed by the contaminants. Additionally, development of the rail trail and water access is expected to generate up to 120 new jobs from ancillary businesses, up to \$3 Million in new tax revenues and related monies per year, and up to six (6) new businesses, which will boost the economy of both Fayette and Greenbrier Counties and potentially lower the percentage of low-income populations. The MRV is afforded a great opportunity to revitalize and boost the economies of Fayette and Greenbrier County by focusing efforts on utilization of their natural resource assets to grow the outdoor recreation infrastructure and tourism industries. To do this, outdoor recreation infrastructure must provide an experience that will keep visitors coming back, attract new

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residents, provide job opportunities, and enhance the livelihood for existing residents, all of which are goals of development related to the MRRT and the proposed Snake Island Recreational Area. According to the WV Department of Tourism, the tourism industry in WV recorded its highest-ever economic impact last year, bringing in nearly \$5 billion in visitor spending. Research shows that nearly a quarter of Americans' first jobs were in the tourism industry, and the average salary of an American who got their start in tourism is \$82,000. In West Virginia specifically, management-level tourism professionals tend to earn around \$60,000 (https://wvtourism.com/tourismworks/). This economic expansion will serve to drive not only an increase in employment opportunities, but expansion of the tax base and associated supportive services for area residents.

3(b) Advancing Environmental Justice

According to information obtained from the U.S. Climate Resilience Toolkit, Climate Explorer (https://crt-climate-explorer.nemac.org/), the average daily temperature for Rainelle, WV will fluctuate between 64.1 degrees Fahrenheit in the 2020s and 67.1-degrees Fahrenheit in the 2050s, with the average days of >90 degrees Fahrenheit maximum temperatures being between 9.6-10.4 days in the 2020s, and 20-29 days in the 2050s. The average days of <32 degrees Fahrenheit maximum temperatures being between 17.5-18 days in the 2020s, and 13.1-14.8 days in the 2050s. The MRRT will provide ideal recreational and exercise opportunities for a variety of outdoors enthusiasts who enjoy outdoor activities in all types of weather, and will increase accessibility for walking, hiking and biking routes, as well as cross country skiing, rock climbing, kayaking, and white-water rafting routes through the area. Development of the proposed Snake Island Recreational Area will serve to promote use of the MRRT, but also further provide an area along the trail where trail users can enjoy primitive camping and outdoor classroom/education areas, as well as access to the Meadow River. Remediating contaminants identified at the site and implementing recreation uses will positively impact the health and welfare of people of color and the population with low income, which are currently disproportionality affected by the environmental indicators that exceed either the state, regional or national values. Climate adaptation and mediation steps will be recorded in ACRES.

2.b. Community Engagement

2.b.i. Project Involvement and 2.b.ii. Project Roles

NRGRDA is engaging the community through a network of local non-profit groups and entities, plus City and State agencies, that will be used to canvas the local community and obtain extensive involvement. Partners and associated contact information and project roles are provided as follows:

Project Partner	Contact Information	Project Responsibility
Meadow River Valley Association	Beth Gill, 304-640-4061	Local community interaction
	bgill@greenbrierenv.com	and outreach assistance
National Coal Heritage Area	Christie Bailey, 304-465-3719	Site reuse and historical input,
	info@coalheritage.org	local community interaction
Active Southern WV	Melanie Seiler, 304-619-1619	Provide input on recreational
(Recreational-based entity)	melanie@activeswv.com	complex amenities
Greenbrier West High School – Meadow	Angie Leef, 304-667-9284	Input from local high school
River Rail Trail Youth Advisory Council	aleef@k12.wv.us	students on site reuse
Mountain State Trail Alliance	Andy Davis, 304/853-0722	Site reuse input for trail
	adavis@nrgrda.org	development within the
		recreational complex
Fayette and Greenbrier County	Matthew Ford, 304-520-4260	Coordination with Meadow
Commissions	mford@greenbrierenv.com	River Rail Trail and site reuse
		planning

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WV Brownfields Assistance Center	George Carico, 304/696-5456	Technical assistance and
	carico@marshall.edu	community engagement
WVDEP Office of Environmental	Erin Brittain	Technical assistance. community
Remediation		outreach/education, VRP
		Oversight

2.b.iii. Incorporating Community Input

NRGRDA will use its regularly scheduled quarterly meetings as a primary method for obtaining community input and dissemination of project information. Meetings are scheduled every three months and are open to public participation, adhering to current COVID-19 meeting restrictions and social distancing guidelines, if applicable. A question-and-answer session is included in each meeting, allowing for public input. Meetings are also accessible via a virtual platform for those that can't attend in-person (or due to COVID-19 restrictions). All questions and comments pertaining to this project will be recorded, with answers to questions provided in a timely manner, normally within one business day. This project will be an on-going NRGRDA meeting agenda item throughout the 4-year project timeframe. A "Project Summary Update" will be updated and distributed at each quarterly meeting throughout the duration of the project to keep the community up to date on project advancements. All written correspondence will be in English, the primary language used throughout the area. Immediately after each quarterly meeting, all project information and meeting notes will be added to NRGRDA's project website to keep the local community up to date on project activities. This website includes a comment section for community members to use to provide additional input.

3. TASK DESCRIPTIONS, COST ESTIMATE, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan

The Former Rainelle Dump has various contaminants across the site, including heavy metals and PAHs. Several contaminants exceed WV De Minimis standards for residential use of the property. Lead in soil exceeds the standard for industrial use. Complete removal of all contaminants is not feasible, due to elevated removal costs, as detailed in the draft Analysis of Brownfields Cleanup Alternatives (ABCA, submitted with application). A combination of removal of highly contaminated soils and capping of lower impacted contaminated soils at select locations, based on environmental assessment results, will be conducted. Remediation activities will include a risk-based assessment on remaining contaminants to ensure safe future site usage. The site will be entered in the WV Voluntary Remediation Program (VRP), which requires a WV Licensed Remediation Specialist (LRS) to oversee all remediation activities. All remediation activities will be conducted in order to meet VRP requirements and standards. Preparations for cleanup activities will begin immediately after grant award notification. Project timeframe is 36 months after start date, anticipated to start on October 1, 2024.

3.b. Description of Tasks / Activities and Outputs

Task descriptions including project implementation, project schedule, task lead and task outputs are summarized in the following table:

Task 1: Project Management and WV VRP Preparation

3.b.i. Project Implementation: Project management and oversight, cooperative agreement completion, and all required quarterly and financial reporting will be under the direction of NRGRDA. A WV LRS experienced in both EPA Brownfields-funded projects and WV VRP projects will be hired using a competitive bid process to enter the site into the WV VRP. Activities in this task include Pre-Application and Kick-Off meetings with the WVDEP, VRP application submittal, compilation of Work Plan, finalization of ABCA, and WVDEP involvement for VRP guidance. NRGRDA personnel will attend one

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WV Brownfields Conference or EPA Brownfields Conference, as allowed based on COVID-19 restrictions (if applicable). Public meetings (in-person and virtual platforms) will be held throughout the 3-year project timeframe on a quarterly basis (every three months).

- 3.b.ii. Anticipated Project Schedule: Month 1 through Month 48
- 3.b.iii. Task Lead: NRGRDA will oversee project management; LRS will oversee VRP activities
- 3.b.iv. Outputs: 16 quarterly project reports, 16 quarterly financial status reports, participation in 2 brownfield conferences, 1 VRP application, 16 public meetings, ABCA finalized, 1 Workplan

Task 2: VRP Activities

- 3.b.i. Project Implementation: The LRS will oversee completion of required VRP Assessment Reports, including a VRP Site Assessment Report and Human Health & Ecological Risk Assessment Report. Field activities will include contaminated soil excavation and capping of impacted areas.
- 3.b.ii. Anticipated Project Schedule: Month 3 through Month 45
- 3.b.iii. Task Lead: LRS (with WVDEP input)
- 3.b.iv. Outputs: 1 VRP Site Assessment Report, 1 Risk Assessment Report

Task 3: Groundwater Monitoring

- 3.b.i. Project Implementation: The LRS will oversee groundwater sampling and associated monitoring and modeling to meet VRP requirements for demonstration of monitored natural attenuation, and subsequent reporting.
- 3.b.ii. Anticipated Project Schedule: Month 6 through Month 45
- 3.b.iii. Task Lead: LRS
- 3.b.iv. Outputs: Groundwater Monitoring and Modeling Report

Task 4: VRP Completion

- **3.b.i. Project Implementation:** The LRS will Submit for approval VRP final reports and provide report revisions and associated project information as requested by WVDEP.
- 3.b.ii. Anticipated Project Schedule: Month 30 through Month 48
- 3.b.iii. Task Lead: LRS (with NRGRDA providing report submittal oversight)
- 3.b.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 4.826 acres of brownfield property for new use

3.c. Cost Estimates

Cost estimates are provided on the following table, using information from Qualified Environmental Professionals and "EPA Interim General Budget Development Guidance for Applicant and Recipients of EPA Financial Assistance Guidelines" document:

Budget Categories		Project Tasks (\$)				
		Project Management	VRP	Groundwater	VRP	Total
		& VRP Prep	Activities	Monitoring	Completion	
Costs	Personnel	21,600				21,600
	Fringe Benefits					
Direct	Travel ¹	1,825				1,825
Ö	Equipment					
	Supplies					
	Contractual	16,334	330,071	61,660	25,110	433,175

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Other ²	12,800	22,500		8,100	43,400
Total Direct Costs	52,559	352,571	61,660	33,210	500,000
Indirect Costs					
Total Federal Funding	52,559	352,571	61,660	33,210	500,000
Total Budget	52,559	352,571	61,660	33,210	500,000

(1 travel to Brownfield Conference; 2 WVDEP VRP estimated costs)

Budget Details for each Project Task are as follows:

Task 1 – Project Management and VRP Preparation

Personnel Cost: Project Management, 12 hours per month, 36 months, 432 hours at \$50.00 per hour; *Total \$21,600*

Travel: 2 people attending one Brownfields Conference event, \$1,825 per event; Total \$1,825

Contractual: LRS contractor (\$135.00 er hour) participating in 12 quarterly project update meetings, 4.5 hrs., \$607.50 meeting; \$7,290; two required WVDEP VRP meetings (7.5 hrs. per meeting, \$1,012 per meeting); \$2,024, LRS finalizes ABCA document (12 hrs.), compiles VRP application (20 hrs.), and compiles Work Plan (20 hrs.); \$7,020; *Total* \$16,334

Other: WVDEP costs (\$5,000 VRP application fee), 52 hours (@\$150.00 per hr.) for two meetings, public notice, initial site visit); *Total* \$12,800

Task 2 – VRP Activities

Contractual: Groundwater sampling / analysis (8 wells at \$2,605); \$20,840; Benthic Macroinvertebrates Study, \$13,562; analytical data validation, \$14,872; VRP Site Assessment Report (132 hrs. @ \$135. / hr.), \$17,820; Risk Assessment Report (185 hrs. @ \$135.00 / hr.), \$24,975; Remedial Action Work Plan (90 hrs. @ \$135.00 / hr.), \$12,150; Well development fluid disposal, 29 drums @ \$600 / drum, \$17,400; excavating / disposal of highly contaminated soils, \$93.50 / ton (873 tons) \$81,626; capping of lower impacted soils; \$50.27 / cubic yard (2,398 cubic yards), \$120,547; Erosion and sediment controls; \$\$6,279

Total \$330.071

Other: WVDEP costs (at \$150 / hr.) for SAP/QAPP report reviews (36 hrs.), Site Assessment Report Review (36 hrs.) and split sampling analytical costs (\$1,800), Risk Assessment Report Review (36 hrs.), Remedial Action Work Plan Review (30 hrs.)., *Total* \$22,500

Task 3 - Groundwater Monitoring

Contractual: Groundwater monitoring to meet VRP requirements, 8 quarterly rounds of groundwater sampling (@\$10,420 per event), \$41,680; groundwater modeling, 148 hrs. at \$135. / hr., \$19,980;

Total \$61,660

Task 4 – VRP Completion

Contractual: Remedial Action Completion Report, 112 hrs. @ \$135 / hr., \$15,120; Final VRP Report with Land Use Covenant, 74 hrs. @ \$135 / hr., \$9,990

Total \$25,110

Other: WVDEP fees for review of Remedial Action Report (30 hrs.) and Final VRP Report review and approval (24 hrs.), at \$150 / hr.; *Total \$8,100*

3.d. Plan to Measure and Evaluate Environmental Progress and Results

Project outputs will be tracked and measured using the Project Summary Update discussed previously, updated quarterly to coincide with quarterly meetings. The contracted LRS and PR Team members will participate on a quarterly basis as part of NRGRDA's regularly scheduled quarterly meetings, certifying project results are advancing in a suitable and timely way. A NRGRDA representative will also participate at least 2 times per calendar year (6 events minimum) in county commission meetings to keep town leaders

Former Rainelle Dump / Proposed Snake Island Recreational Area, Rainelle, Fayette County, WV New River Gorge Regional Development Authority

abreast of project advancements. Updating property profile information in ACRES will occur as the project progresses. Using this approach throughout the 4-year project period will confirm project activities are meeting projected outputs and overall project goals. If adjustments to the project schedule are required, these adjustments will be fully explained during quarterly meetings. Two primary Project Outcomes are: 1) Remediation of 4.826 acres of brownfield property for redevelopment, and 2) Removal of potential exposure to the local community and future site users of hazardous levels of various heavy metals and PAHs.

After conclusion of the project, property profile information will be updated in ACRES to track future outputs and outcomes. Anticipated future outcomes after conclusion of this project will include a parking lot for area recreational users and an amphitheater, bringing new jobs and additional leveraged funding. The number of jobs created, and related funding leveraged will be periodically added to ACRES to keep EPA up to date on future site developments.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i Organizational Structure / 4.a.ii. Description of Key Staff

NRGRDA is one of only two regional economic development authorities in WV, established by WV legislative action in 1988. Jina Belcher is Executive Director of NRGRDA and will oversee all project activities. Ms. Belcher has been in this position since December 2020, supervising more than 14 projects involving federal, state, and private foundation funding. Ms. Belcher has a background in Recreation and Tourism Management, and previously served as Director of Business Development for Coalfields Development. Assisting Ms. Belcher will be Andrew Davis, Manager of Gateway Community Initiatives. Mr. Davis has a background in Environmental Sciences and will serve as the primary point of contact.

4.a.iii Acquiring Additional Resources

NRGRDA uses a procurement process that follows all WV procurement laws, and subsequently complies with all federal procurement laws. For hiring the required WV LRS, a Request for Qualification (RFQ) Process will be utilized, followed by a review process using quantitative rating criteria. At a minimum, the top three highest ranking RFQ's will be interviewed prior to selection. For subsequent hiring of contractors for site remediation activities, NRGRDA will request proposals which will be subsequently based on established criteria specific to the required project task. Proposals will be evaluated by NRGRDA Board and Staff members, with technical support and related input provided by the WV Brownfields Assistance Center and WVDEP's Office of Environmental Remediation.

4.b. Past Performance and Accomplishments

4.b.i. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments

NRGRDA currently has two active USEPA Brownfields Cleanup grants (awarded FY2020 and FY2023) for the former Hinton Ice House, located in Hinton, WV and Former Beckley Landfill, Beckley, WV. With regards to the Hinton Ice House project, a WV LRS has entered the site into the WV VRP, risk-based assessment work in nearing completion, and on-site remediation activities are on-going. NRGRDA is currently undergoing selection of a WV LRS for the former Beckley Landfill Project.

(2) Compliance with Grant Requirements

All quarterly reports and financial reports have been submitted on time, and there have been no issues or project delays thus far. ACRES has been updated as project activities are completed. NRGRDA has been in full compliance since this project was awarded. The project is on schedule to be completed within the 3-year project timeframe.



west virginia department of environmental protection

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

Ms. Jina Belcher, Executive Director New River Gorge Regional Development Authority 200 Main Street Beckley, WV 25801

RE: State Environmental Authority Acknowledgement Letter

FY24 U.S. EPA Brownfields Cleanup Grant Application

EPA-I-OLEM-OBLR-23-15

Dear Ms. Belcher,

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 New River Gorge Regional Development Authority plans to conduct cleanup of the Snake Island Recreational Area / Former Rainelle Dump brownfield site located on Snake Island Road, Rainelle, WV.

The WVDEP affirms that the Snake Island Recreational Area / Former Rainelle Dump 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 New River Gorge Regional Development Authority 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.

The lack of potential river access points along the Meadow River Rail Trail makes the Snake Island Recreational Area / Former Rainelle Dump site integral to the ongoing development of the trail. Given

the site's former use as a dumping ground and the presence of contamination, a Certificate of Completion from the WVDEP Voluntary Remediation Program will ensure the site is ready for redevelopment.

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 Snake Island Recreational Area / Former Rainelle Dump 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,

Jackson Porter

Brownfields Specialist



Threshold Criteria for Cleanup Grants

1. Applicant Eligibility

The New River Gorge Regional Development Authority (NRGRDA) is recognized by the State of West Virginia as an official economic development entity and is eligible for federal funding.

2. Previously Awarded Cleanup Grants

The proposed site (former Rainelle Dump) has not received funding from a previously awarded EPA Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

NRGRDA does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

NRGRDA is the sole owner through fee-simple title of the former Rainelle Dump Property, as recorded in the Office of the Clerk of the County Court of Fayette County, West Virginia, in Deed Book number 844, page 519. The subject site is a 4.826-acre area located near Rainelle, WV. NRGRDA will remain the sole owner of the property until all cleanup work and other obligations funded by the grant have been completed and the grant is closed out.

5. Basic Site Information

- a) Former Rainelle Dump
- b) Snake Island Road, Rainelle, WV 25962
- c) NRGRDA is the Current Owner and obtained ownership on June 12, 2023.

6. Status and History of Contamination at the Site

- a) The former Rainelle Dump (the Site) is contaminated by hazardous substances.
- b) This site operated until the 1970s as a municipal dump, used by the Town of Rainelle for landfilling of various waste materials, including household trash and various small business waste streams. Since closure in the 1970s, the site has remained closed and unused with the exception of occasional use of the property by the Town of Rainelle maintenance staff to burn woody debris. The site is currently not in use.
- c) A Phase II Environmental Site Assessment (ESA) performed using USEPA Brownfields Assessment funds in 2023 indicated environmental impacts found in various sections of the site. Site soils and groundwater include a variety of contaminants, including heavy metals (arsenic, cadmium, and lead) and polycyclic aromatic hydrocarbons (benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, and dibenzo(a,h,)anthracene).
- d) Contamination occurred from materials stored at the dump during landfilling operations at the site.

7. Brownfields Site Definition

- a) The former Rainelle Dump is not listed or proposed for listing on the National Priorities List;
- b) The former Rainelle Dump 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

c) The former Rainelle Dump is not subject to the jurisdiction, custody, or control of the United States government.

8. Environmental Assessment Required for Cleanup Proposals

A Phase I Environmental Site Assessment (ESA) was completed on May 3, 2022 on the property as part of an EPA community-wide brownfields assessment grant being conducted by the West Virginia Department of Environmental Protection (WVDEP). Also, as part of the brownfields assessment grant, a ASTM E1903-19 compliant Phase II ESA was conducted on the property in January 2023. An updated Phase I ESA was completed in June 9, 2023 on behalf of the NRGRDA prior to acquisition of the property.

9. Site Characterization

- a. Not Applicable
- b. The former Rainlle Dump site is eligible for the WVDEP Voluntary Remediation Program. A letter from the WVDEP indicating eligibility is attached.
- c. Not Applicable

10. Enforcement or Other Actions

There are no ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

11. Sites Requiring a Property-Specific Determination

The Site does not require a property-specific determination to be eligible for federal funding.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

- a) Property Ownership Eligibility Hazardous Substance Sites
 - iii.(1) Bona Fide Prospective Purchaser Liability Protection
 - a. Information on the Property Acquisition
 NRGRDA obtained ownership of the former Rainelle Dump site from
 the Town of Rainlle on June 12, 2023 via a negotiated purchase.
 Ownership is fee simple. NRGRDA has no familial, contractual,
 corporate, or financial relationships or affiliations with the Town of
 Rainelle.
 - b. Pre-Purchase Inquiry
 - An ASTM E1527-21 compliant Phase I ESA was conducted by Greenbrier Environmental Group, Inc. on the property in June of 2023 prior to property acquisition as part of an EPA community-wide brownfields assessment grant being conducted by the WVDEP. The environmental due diligence completed by Greenbrier Environmental Group, Inc. was performed under the direction of Matthew Ford, LRS, an environmental professional with over 19 years of environmental due diligence and consulting experience.
 - c. Timing and/or Contribution Toward Hazardous Substances Disposal NRGRDA affirms that it is not liable for contamination at the site or is affiliated with any other person potentially liable for the contamination.



d. Timing and/or Contribution Toward Hazardous Substances Disposal NRGRDA affirms that all disposal of hazardous substances occurred at the Site prior to NRGRDA acquiring the property, and that NRGRDA did not contribute to any release, disposal, or transport of hazardous substances at the former Rainelle Dump site. NRGRDA affirms that it did not, at any time, arrange for disposal of hazardous substances at the site or transport hazardous substances to the site.

e. Post-Acquisition Uses

NRGRDA acquired ownership on June 12, 2023. The property has been vacant and unused since the acquisition by NRGRDA. Access to the site has been restricted by a locked gate.

f. Continuing Obligations

NRGRDA will fully 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; and provide all legally required notices.

13. Cleanup Authority and Oversight Structure

a) Cleanup Oversight

NRGRDA will work with the Southern West Virginia Brownfields Assistance Center and the West Virginia Department of Environmental Protection to fully comply with competitive procurement provision and ensure that technical expertise is engaged that will fully guarantee that the cleanup is protective of human health and the environment. NRGRDA will participate in the WVDEP Voluntary Remediation Program under the direction of a Licensed Remediation Specialist to assure Site remediation per statutory expectations.

b) Access to Adjacent Properties

NRGRDA has been and will be working with all adjacent property owners to assure access as required.

14. Community Notification

a) Draft Analysis of Brownfields Cleanup Alternatives

The draft proposal and the draft Analysis of Brownfields Cleanup Alternative (ABCA) were provided for public review and comment at a public meeting on October 23, 2023 and at Rainelle Town Hall. Upon selection for funding, NRGRDA will finalize the ABCA and keep the public abreast of progress on the Site.

b) Community Notification Ad

NRGRDA announced a public meeting to notify the community of the application for the Brownfields Cleanup grant on October 21, 2023, via an ad placed in the Register Herald newspaper. The public were made aware that a draft copy of the grant proposal and the ABCA were provided at the Rainelle Town Hall located at 201 Kanawha Avenue, Rainelle, WV and at NRGRDA's offices located at 200 Main Street, Beckley, WV, and invited public comments at the NRGRDA offices, as well as at the public meeting which was held at 7:00 PM on October 23, 2023.



c) **Public Meeting**

NRGRDA hosted a public meeting to announce the submission of an EPA grant application for cleanup of the former Rainelle Dump site on Monday, October 23, 2023 at 7:00 PM at the Rainelle Town Hall located at 201 Kanawha Avenue, Rainelle, WV, which is in the nearest town to the former Rainelle Dump site. The meeting was held during the regularly scheduled Town of Rainelle Council meeting. COVID-19 precautions and social distancing practices were used during the meeting. The public meeting was accessible to persons with limited English proficiency and persons with disabilities. The draft proposal and ABCA were presented for public comment at the meeting and were made available at the NRGRDA offices from October 23, 2023 – November 17, 2023. No comments and questions were received at the public meeting. No comments have been received at NRGRDA's offices.

d) Submission of Community Notification Documents

The draft ABCA, community notification documents, summary of comments, and responses to comments, public meeting notes, and the meeting sign-in sheet are attached.

15. Named Contractors and Subrecipients

- a) Contractors Not Applicable
 - NRGRDA is not naming a contractor in this application. Contractors and consultants will be procured after award of the Brownfields Cleanup Grant in accordance with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500.
- b) Subrecipients Not Applicable NRGRDA is not naming a subrecipient in this application.