



R03-24-C-012

112 Adams Street Suite 205 · Fairmont, WV 26554 · 304.942.4269 · www.wvlsc.org

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## **Narrative Information Sheet**

### 1. Applicant Identification

West Virginia Land Stewardship Corporation  
112 Adams Street, Suite 205  
Fairmont WV 26554

### 2. Funding Requested

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$500,000
- c. Contamination: Hazardous Substances

### 3. Location: Grafton, Taylor County, West Virginia

### 4. Property Information:

- a. Site name & Address: Hazel-Atlas Glass, Railroad street Grafton WV, 26354.
- b. Site details: 6.26 acres broken up into 4 parcels, informally known as Hazel-Atlas.
- c. Owner: West Virginia Land Stewardship Corporation (WVLSC) owns fee simple title to the property.

### 5. Contacts

#### a. Project Director

Taylor Bennett  
Executive Director  
112 Adams Street, Suite 205  
Fairmont WV 26554  
304.942.4269  
admin@wvlsc.org

#### b. Chief Executive/Highest Ranking Elected Official

Taylor Bennett, Executive Director  
112 Adams Street, Suite 205  
Fairmont, WV 26554



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6. Population  
Grafton, WV: 4,651 as of 2021<sup>1</sup>

Other Factors Checklist

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	X
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.	X
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).	X
The proposed site(s) is in a federally designated flood plain.	X
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	X

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<sup>1</sup>U.S. Census data

## **1.a.Target Area & Brownfields**

### **1.a.i. Overview of Brownfield Challenges and Description of Target Area**

A proud railroad town, Grafton, WV is a small municipality located on the banks of the Tygart River in Taylor County. The town was founded during construction of the B&O Railroad. By 1852, tracks from the south reached Grafton and branched west to Parkersburg and north to Wheeling, creating America's first Trans-Appalachian railroad, linking the east coast with the Ohio River, and establishing the town as gateway to the wealth west of the Alleghenies. Chartered in 1856, Grafton boasted a machine shop, foundry, and roundhouse to service the railroad. Businesses such as sawmills, coal mines, coke ovens, and brick and glass factories shipped a variety of products to population centers, fueling America's economy.

Today, industries have disintegrated, leaving the city scarred by environmental contamination and vacant structures. Walmart, the City Hospital, Leer Mine, and CSX (formerly B&O) Railroad are now the town's main employers. From a population of 8,500 in the 1920s, Grafton has declined to approximately 5,000, over half of whom belong to sensitive populations including children, elderly, and minority communities.

However, recent Main Street revitalization has generated new life downtown. The historic Cohen Building and Manos Theater are being redeveloped as mixed-use spaces for the community and its visitors. The State of WV has made significant investment in Tygart Lake State Park, on the southern edge of town and Valley Falls State Park just downriver. With Interstate highways 79 and 68 just twenty miles to the east, the parks attract many visitors. Grafton is a unique city with interesting Civil War and railroad history; a Mother's Day Shrine honoring Grafton native, Anna Jarvis, founder of the holiday; and other points of interest waiting to be rediscovered.

### **1.a.ii. Description of Proposed Brownfield Site**

The Hazel-Atlas site is located on the banks of the Tygart River, adjacent to US Route 50, a visual and physical gateway to downtown Grafton. It consists of four (4) parcels and approximately 6.26 acres of vacant land. The site was purchased in 1916 by the Hazel-Atlas Glass Company, making it the largest glass plant owner in the world. The plant continued to operate for the next 43 years. By the time the decision was made to close due to the economic downturn in 1959, 480 people were out of work. A plastics producer, Baby World, acquired the property shortly thereafter. After plastic production ceased, the site remained mostly vacant and was purchased in the mid-2000s for salvage. At this time, The West Virginia Department of Environmental Protection (WVDEP) conducted environmental site assessment (ESA), leading to remediation of an oily pit. Also at this time, all asbestos containing material was removed from the site.

As a result of historic uses, significant contaminants are present on the site. Three volatile organic compounds (VOC's) (benzene, tetrachloroethene, trichlorethene) are considered contaminants of concern (COCs) for the surface and subsurface soil and two VOCs (trichloroethelene, vinyl chloride) are considered COCs for groundwater, both due to exceedances of de minimis residential indoor air values. Additionally, three VOCs (chloroform, trichloroethene, vinyl chloride) are considered COCs for groundwater due to the exceedance of groundwater RBCs. Hazel-Atlas is now owned by the West Virginia Land Stewardship Corporation (WVLS), a 501(c)3 organization working in partnership with Unleash Tygart (UT), a local community development organization, to pursue remediation via an EPA cleanup grant and WV DEP's Voluntary Remediation Program (VRP).

## **1.b. Revitalization of the Target Area**

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

Reuse of Hazel-Atlas is foundational to Grafton’s plans for riverfront revitalization, with visions of and a mixed-use space, focusing on green space and water access for recreational use, including boat launches, outdoor event space, and options for residential and commercial structures. Plans account for the fact that a portion of the site is in the 100-year floodplain and incorporate renewable energy. Because remediation will likely include capping and reuse will require parking, a solar array over parking is being discussed. Prior to the grant period, WVLS, partnering with UT, will oversee additional reuse planning to be conducted by WVDEP. This will ensure site plans reflect remediation needs, meet any institutional and engineering controls required for the site, and that reuse plans meet community needs.

The 2020 Taylor County Economic and Tourism Analysis, which was funded by an EPA Assessment Grant, identified lack of river access as a major hindrance to the County and City’s ability to leverage recreational economic opportunities presented by the proximity of the Tygart River<sup>1</sup>. Additional deficits include lack of quality residential housing and commercial spaces such as eateries and retailers. The site sits prominently at the gateway to Grafton’s downtown on Route 50. Reuse plans will create a visually pleasing space that draws visitors into the downtown district, further supporting the economic development of the community.

In addition to the Taylor County Economic and Tourism Opportunity Analysis that identifies gaps in the local market, several studies on downtown structures point to similar factors as both lacking and as opportunities to improve economic development in Grafton. Plans for Hazel-Atlas fit into the Region VI Planning and Development Council’s 5-year plan, which drives area master planning. Reuse of the site is aligned with the plan’s priority to “Nurture the Authentic Mountaineer Country Experience and Quality of Life.”<sup>2</sup> Specifically to “Preserve & Restore Areas of Significance” and “Invest in Livable Community & the Quality of Experience.”

Reuse plans will leverage previous EPA and WVDEP investment. Upriver, the Carr China site sits adjacent to a municipal campground. Under an EPA Assessment Grant, the Northern WV Brownfields Assistance Center (NBAC) worked with local government partners to develop reuse plans which include a recreational boat and kayak launch. Reuse of Hazel-Atlas will bookend a recreational green/blue corridor along the Tygart. Visitors could stay at the campground, launch their boats, and travel from Carr China downriver to pull out at Hazel-Atlas. Currently, boaters and inner-tube riders must travel 6-8 hours downriver. Additional access will create recreation options for enthusiasts of all skill levels and keep recreationists downtown to increase traffic to local businesses. These efforts align with statewide initiatives to revitalize natural and built assets in river communities, generating an increase in tourism.

### **1.b.ii. Outcomes & Benefits of Reuse Strategy**

Reuse of Hazel-Atlas will anchor riverfront revitalization efforts; make a new gateway into downtown; provide river access to visitors and residents; and meet community needs for public space, commercial/retail space, and workforce housing. Americans with Disabilities Act (ADA) accessible kayak and boat launches will open the Tygart to vulnerable populations that are currently excluded. Reuse will increase economic resiliency and make Grafton competitive with neighboring communities and will generate momentum in the town’s ongoing revitalization.

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<sup>1</sup> Downstream Strategies, "Growing Tourism in Grafton and Taylor County" WVCountyTaylor.com, accessed August 27, 2021,

[https://www.wvcountytaylor.com/files/ugd/2a2718\\_385c06fc12eb450b9ca04f990b5a5aa4.pdf?index=true](https://www.wvcountytaylor.com/files/ugd/2a2718_385c06fc12eb450b9ca04f990b5a5aa4.pdf?index=true).

<sup>2</sup> Downstream Strategies, "Line of Sight: Region VI Planning And Development Council Comprehensive Economic Development Strategy 2022-2026" wvregionalcouncils.com/, accessed October 30, 2023, <https://cdn.sanity.io/files/2avbnain/production/d529e584793e8be993036f03494d6a0fcd6fb624.pdf>

The EPA estimates that residential property values up to 1.29 miles from a cleanup site can increase from 5-15.2%.<sup>3</sup> Further, an average of \$19.78 was leveraged in local communities for each EPA Brownfield dollar spent on assessment and cleanup.<sup>4</sup> The Carr China site was awarded \$200,000 in EPA cleanup funding, estimated to bring about \$2.5 for every \$1 invested in riverfront cleanup. Estimates also indicate that for every \$1 invested in conservation activities, \$4 is generated. Therefore, Taylor County could see approximately \$2,000,000 in impact from this EPA investment.<sup>5</sup>

Statista Research released a 2021 study stating that kayaking participation nationwide has grown by 87.3% since 2010. Locally, this is demonstrated by the Adventure Club, the only outfitter offering tubing on the Tygart River in Grafton. Since 2016, activity has grown over 900%, starting with 345 people served the first year and growing to over 3,600 annually.

This project will address overwhelming health concerns by preventing direct contact with contaminants; addressing groundwater and soil contamination will increase community flood resilience by preventing the spread of contaminants during a flood event. Engineering and institutional controls will protect against future contamination, and the inclusion of stormwater best management practices (BMPs) such as use of rain gardens will improve groundwater and flood management plans. Incorporating renewable energy in the form of over-parking solar will be the first renewable energy on a public use space in Grafton, setting the tone for renewable incorporation in future redevelopment.

### **1.c. Strategy for Leveraging Resources**

#### **1.c.i Resources Needed for Site Characterization**

Through an EPA Assessment Grant, WV DEP contributed approximately \$178,500 for site assessment and remedial activities in 2003. NBAC spent approximately \$11,100 from a FY21 EPA Assessment grant to update these assessments. WVLSC anticipates the need for further site characterization, which is included in the work plan and budget. If these funds are insufficient, WVLSC will seek support through WVDEP and its \$2 million EPA Assessment Grant.

#### **1.c.ii Resources Needed for Site Remediation**

WVLSC anticipates the amount requested in this Cleanup Grant will be sufficient to complete remediation as outlined in the draft ABCA and budget. If grant funding is insufficient, WVLSC holds in reserve \$247,100, roughly 49% of budget, for project completion. UT will manage community engagement and provide in-kind leverage including the Executive Director's salary at 10% time/week, for a total of \$8,400/year during the grant period plus approximately \$1,500/year in materials for community meetings, grant updates, and signage.

#### **1.c.iii. Resources Needed for Site Reuse**

UT will be responsible for site reuse and will leverage state and federal funding, New Markets Tax Credit, and Opportunity Zone programs as appropriate. WVDEP has committed to \$25,000 for reuse planning and UT will provide in-kind leverage of 25% of the Executive Director's salary following the grant period (estimated \$21,000). Further, UT has an allocated

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<sup>3</sup> Haninger, K., L. Ma, and C. Timmins. 2017. The Value of Brownfield Remediation. *Journal of the Association of Environmental and Resource Economists* 4(1): 197-241.

<sup>4</sup> 1 U.S. Environmental Protection Agency, "Brownfields Program: Environmental and Economic Benefits," accessed October 30, <https://www.epa.gov/brownfields/brownfields-program-environmental-and-economic-benefits>.

<sup>5</sup> Whitmer Announces New Investment in Outdoor Recreation," Michigan.gov, accessed October 30, <https://www.michigan.gov/whitmer/news/press-releases/2022/08/30/whitmer-announces-new-investment-in-outdoor-recreation>.

Congressional Directed Spending Request through HUD Economic Development for \$3 million to act as seed, leverage, and gap funding for projects in Grafton that can also be used for reuse.

Name of Resource	Amount	Use	Secured/ Unsecured	Additional Details
US EPA BF Cleanup Grant	\$500,000	Assessment, Remediation	Unsecured	
WV DED	\$257,100	Remediation if necessary	Secured	WVLSC budget for BF Remediation
WV DEP	\$25,000	Reuse Planning	Secured	
2024 CDS Earmark	\$3,000,000	Reuse	Secured	

**1.c.iv. Use of Existing Infrastructure**

City water and sewer are available at the site and electric lines run to the property, although reuse plans include renewable energy, particularly solar. A city road runs to the property and proximity to Route 50 increases site accessibility. Existing infrastructure will meet the reuse needs of the site. The river and redevelopment activities occurring in town cannot be overlooked as infrastructure that will be leveraged as part of this project.

**2. Community Need & Community Engagement**

**2.a. Community Need**

**2.a.i. The Community’s Need for Funding**

To date, redevelopment and reinvestment in Grafton has been limited due to reliance on dying industrial sectors and extractive industry and is compounded by loss of population due to lack of employment opportunities. Census tract 9646, where Grafton is located, is consistently ranked as one of the poorest tracts in WV. Grafton has historically depended on coal severance tax revenue. However, this revenue has been drastically depleted due to both the decline of the coal industry and a recent reduction of the severance rate. What little funding is left is allocated to keeping basic infrastructure viable. Unlike other states, WV does not allocate funding to assist in brownfield remediation, so resources are limited. Furthermore, Grafton's relatively large elderly population (old age dependency ratio: 37.9%), relatively high unemployment rate (9%), and high percentage of low-income households (40.7%) put funding for brownfield remediation out of reach for the region’s philanthropic and social organizations. Without assistance from an EPA Cleanup Grant, this site will remain vacant and contaminated, leaving Grafton’s vulnerable populations to deal with a host of health and economic problems unless funding can be secured.

**2.a.ii. Threats to sensitive populations**

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

Sensitive populations are more susceptible to the negative health, economic, and environmental impacts of brownfield sites, especially in Grafton where more than 25% of the target area are over the age of 65 and more than 27% are under the age of 18. Over half of the population is female (52.1%), with 23.9% of the population being women of childbearing age. There is a small minority population composed of individuals identifying as Asian (4.1%), black or African-American (0.9%), and two or more races (1.3%). Additionally, 26.4% of the population is living with a disability, more than twice the national rate (12.8%)<sup>6</sup>.

Threats to sensitive populations from brownfield sites are compounded by persistent poverty, an ongoing concern for Grafton residents. Taylor County has had poverty levels higher

<sup>6</sup> U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

than the national average in each of the last three Census reports (1990: 22.9% poverty rate in Taylor County, 13.5% rate in the US; 2000: 17.8% Taylor County, 11.3% US; 2010: 20.3% Taylor County, 15.3% US). The percentage of people living below the poverty level is higher (20.5%) than the national average (12.3%), and 23% of children are living in poverty (see table below).

	Median Household Income	Unemployment	Poverty Rate	Median Home Value
Grafton	\$34,726	8.8%	30.3%	\$74,500
West Virginia	\$54,329	6.4%	17.9%	\$155,100
Region	\$47,546	7 %	15%	\$108,300
United States	\$74,755	4.3%	12.6%	\$193,500

Source: American Community Survey 5-Year Estimates, 2021

Lack of education makes dealing with these challenges even more difficult for Grafton residents as individuals with no college education are more vulnerable to economic downturns and industrial decline. Only 16.7% of the population has a bachelor’s degree or higher<sup>1</sup>. The redevelopment of this site will help to address the economic threats of longstanding industrial operations and trends on sensitive populations, creating new space to build a more diverse and stable local economy.

**(2) Greater than normal incidence of disease & adverse health conditions**

Contaminants present at the site represent a threat to Grafton residents. Specifically, VOCs (benzene, tetrachloroethene, trichlorethene) found in surface and subsurface soil and VOCs (chloroform, trichloroethelene, vinyl chloride) found in groundwater. Additionally, both arsenic and benzo(a)pyrene were identified in surface and subsurface soil. These contaminants have been documented to cause damage to the brain and nervous system; blood disorders, skin disease, and lung and skin cancer; damage to the immune, cardiovascular, developmental, neurological, reproductive, and respiratory systems; and cancer.

Unsurprisingly, cancer rates in WV, including Taylor County are higher (13.9%) than national average (11.5%)<sup>7</sup>. More than 12% of residents have asthma, which is higher than the national average of 9.7%. Furthermore, this tract has a 15.5% diabetic rate, and recent research has demonstrated that air pollution is a leading cause of type 2 diabetes incidence<sup>8</sup>, in addition to the more traditionally cited factors of inactivity and poor diet. At more than 40%, WV had the highest obesity rate in the nation in 2017, with the rate in Taylor County 40.8%, and the rate in Grafton a startling 42.2%<sup>9</sup>. Overall, Census Tract 9646 has the worst health profile of any in Taylor County.

**(3) Environmental Justice**

**(a) Identification of Environmental Justice Issues**

The legacy of WV’s extraction economy can be seen, not only in legacy environmental concerns but in the poor health outcomes, poverty, and overall lack of threat resilience demonstrated by communities like Grafton. Brownfield sites are more likely to be positioned in low-income and minority neighborhoods creating populations that are disproportionately impacted by contaminants<sup>10</sup>. EJSCREEN identifies Grafton as both a Justice40 community and an EPA

<sup>7</sup> WV Health Statistics Center (2017), Behavioral Risk Factor Surveillance System

<sup>8</sup> European Review for Medical and Pharmacological Sciences (2019), “Effect of Environmental Air Pollution on Type 2 Diabetes Mellitus”

<sup>9</sup> Robert Wood Johnson Foundation, County Health Rankings (2021)

<sup>10</sup> U.S. General Accounting Office (1983), “Siting of Hazardous Waste Landfills and their Correlation with Racial and Economic Status of Surrounding Communities”

disadvantaged community and it is no wonder. In addition to the threats outlined above in the 94th percentile for low life expectancy for the nation and 86th percentile in the state.

Flood risk also threatens Grafton’s sensitive populations should the Tygart River flood cause contaminant migration. While only a portion of the property is in a FEMA-designated 100-year floodplain, the WV Flood Tool indicates that the rest of the site is in an Advisory Flood zone, and according to EJSCREEN, the target census tract is at a much higher flood risk than much of the country (74<sup>th</sup> percentile).

**(b) Advancing Environmental Justice**

Addressing environmental justice concerns in Grafton begins with remediation of onsite contamination. This will improve health outcomes by limiting exposure to COCs on site, improving health outcomes for individuals visiting, as well as those living adjacent to the site. It will also improve flood resilience by reducing the risk of contaminant migration in the event of a flood. Reuse plans will continue to address the environmental justice issues outlined in this and previous sections by increasing economic stability, providing access to a clean, healthy space in which to engage in outdoor activity for Grafton residents, and improving overall quality of life. Reuse plans will incorporate anti-displacement measures, including considerations for making any housing that is provided on site economically feasible for Grafton residents. Finally, residents of the adjacent Fetterman neighborhood, and all Grafton residents will be included in community engagement processes, providing ample opportunity for incorporation of their concerns and input.

**2.b. Community Engagement**

**2.b.i. & ii. Project Partners and Project Partner Roles**

<b>Name of organization</b>	<b>Point of Contact</b>	<b>Specific involvement in project</b>
Unleash Tygart	Heather Hudson, Director (304)-439-1997 Heather@UnleashTygart.org	Community development organization, intended recipient of property pending remediation, facilitator of riverfront redevelopment.
The Adventure Club	Bryan Smith, Director (304) 694-5664 advclubint@gmail.com	Community outreach, Re-use facilitation. End-user of redeveloped space.
Save the Tygart Watershed Association	Kelley Flaherty (724)-562-7074, flahertykl@ab.edu	Consultant to project as recipient of prior EPA Cleanup Grant. Responsible for Carr China reuse plan.
Region VI Planning & Development Council	Sheena Hunt, Director (304)-366-5693 regionvi@regionvi.com	Ensure project alignment with region priorities.
Taylor County Commission	Patricia Henderson (304)-265-5450 hendersonp@frontier.com	Local outreach and engagement, meeting space, networking hub.
City of Grafton	Kevin Stead, City Manager (304)-265-1412 cityofgrafton@hotmail.com	Assist in project facilitation and re-use planning.
Northern WV Brownfields Assistance Center (NBAC)	Ray Moeller Economic Redevelopment Specialist (304)-293-0390 raymond.moeller@mail.wvu.edu	Site remediation and redevelopment planning assistance; identification of reuse funding sources.



**2.b.iii. Incorporating Community Input**

WVLSC and UT will work with NBAC and their community networks to maximize opportunities for public interaction. Prior to grant submission, the draft ABCA was made available at the Grafton Public Library, and a public meeting was held to incorporate community input on the draft ABCA and application. A summary of questions and responses and a sign-in sheet are offered as part of this application. During the grant period UT will host and WVLSC will attend quarterly “Community Conversations” to solicit feedback and address local concerns or questions and will be on the agenda of Grafton City Council and the Taylor County Commission for quarterly updates beginning in July 2024. Updates will also be shared via social media.

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

**3.a. Proposed Cleanup Plan**

Hazel-Atlas consists of 6.26 acres along the Tygart River in Grafton. The site housed a glass manufacturing plant and a plastics manufacturing plant active from prior to 1911 until the 1960s. Site assessments conducted in 2003 confirmed the presence of Arsenic, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenzo(a,h)anthracene, indo(1,2,3-cd)pyrene) at concentrations greater than the West Virginia’s industrial de minimis standard for Brownfields. WVDEP assessments also indicated iron, lead, chloroform, trichloroethene, vinyl chloride, and bis(2-ethylhexyl) phthalate in groundwater. Additional testing of both groundwater and soil are planned as a component of the cleanup grant and will be completed prior to developing the remedial action work plan (RAWP).

The cleanup plan will reduce risks from exposure to site contaminants through a combination of: 1) targeted contaminant removal, 2) institutional controls, and 3) environmental controls. A human and ecological health risk assessment will be conducted under the WVDEP through the VRP. Removal of limited areas of contamination will be considered and removal and recycling of existing concrete foundation structures may be necessary. Portions of the site that exceed risk criteria may be isolated by use of VRP-approved cap guidance to achieve exposure pathway elimination. The cap will consist of paved areas, new building pads, and/or clean soil as dictated by redevelopment plans. Necessary institutional controls will be identified and implemented. A certificate of completion will be sought through the VRP, indicating that the site has been brought up to standards necessary for the intended reuse.

**3.b. Description of Tasks and Activities**

<b>Task 1: Program Oversight</b>
I. Implementation <ul style="list-style-type: none"> <li>• Hire and manage a qualified environmental professional (QEP) and contractor.</li> <li>• Obtain approval of Quality Assurance Project Plan.</li> <li>• Monitor project progress.</li> <li>• Enter data in ACRES database; prepare and submit quarterly and final reports.</li> </ul>
II. Schedule: <ul style="list-style-type: none"> <li>• Obtain QEP services (prepare Request for Proposals, evaluate applications, conduct interviews, and hire qualified environmental consultant) – Quarter 1/FY25.</li> <li>• QAPP approval – Quarter 2/FY25.</li> <li>• Issue Request for Quotations for contractor for site remediation – Quarter 3/FY25.</li> <li>• Prepare progress reports and MBE/WBE and FFR forms; enter site data in ACRES – Quarterly throughout the grant period.</li> <li>• Coordinate remediation activities and reuse planning with Unleash Tygart and WVDEP – Ongoing throughout remediation activities and grant period.</li> </ul>

<ul style="list-style-type: none"> <li>● Prepare final report and grant closeout material – Within 90 days of grant period end</li> <li>● Attend WV Brownfields Conference and EPA Brownfields Conference - Q3/FY 24, 25, 26.</li> </ul>
III. Task/ Activity Lead: WVLSC Staff.
IV. Outputs: <ul style="list-style-type: none"> <li>● Request for Proposals for environmental professional services.</li> <li>● Request for Quotations for contractor for remediation activities.</li> <li>● Quarterly reports, FFR forms, final report, grant closeout materials, ACRES reports.</li> </ul>
<b>Task 2: Community Involvement</b>
I. Implementation: <p>The WVLSC is working closely with Unleash Tygart to redevelop the Hazel-Atlas property and will coordinate remediation efforts with forthcoming redevelopment plans for the property. WVLSC will work with the City of Grafton, Save the Tygart Watershed Association, Taylor County Commission, Taylor County Development Authority, and WVDEP to coordinate site redevelopment efforts with area revitalization plans and will communicate with stakeholders involved in related revitalization projects. WVLSC will garner community support by communicating project progress through website updates and at Unleash Tygart community meetings, city council meetings, and county commission meetings.</p>
II. Schedule: Communications will continue throughout the grant period and include quarterly updates and monthly partner meetings.
III. Task/ Activity Lead: Unleash Tygart in partnership with WVLSC.
IV. Outputs: <ul style="list-style-type: none"> <li>● Quarterly website and social media updates.</li> <li>● Quarterly community meetings and presentations to Taylor County Commission and Grafton City Council.</li> <li>● Quarterly reports to EPA on community, partner, and stakeholder inputs and activities.</li> </ul>
<b>Task 3: Site Cleanup</b>
I. Implementation: <p>WVLSC will select qualified contractors through a competitive bid process to complete the site remediation under QEP guidance. Cleanup will include remediating contaminated soils; installing engineering controls, such as soil capping, building pad, pavement, etc., as determined by the ABCA and the final RAWP; and applying institutional controls as necessary to protect the environment and site users. The QEP will develop a risk assessment and the remedial action work plan and provide oversight of remedial activities. The QEP will certify that site cleanup is complete.</p>
II. Schedule: <ul style="list-style-type: none"> <li>● Consultant reviews environmental data and identifies any gaps – Quarter 2/FY25</li> <li>● Additional site characterization conducted Quarter 3/FY25</li> <li>● ABCA updated and RAWP developed and approved – Quarter 4/FY25</li> <li>● RAWP implemented – Quarter 1/FY26-Quarter 4/FY26</li> <li>● Remedial Action Completion Report submitted – Quarter 1/FY27</li> </ul>
III. Task/Activity Lead: QEP under WVLSC oversight.
IV. Outputs: QAPP; Final ABCA; RAWP; Remedial Completion Report; Final Report; Documentation of institutional and engineering controls.

**3.c. Cost Estimates**

Cost estimates were developed by a QEP through the development of the ABCA and were based on current market rates for anticipated services required for remediation.

		Project Tasks			Total
		Task 1	Task 2	Task 3	
<b>Direct Costs</b>	Personnel	\$0	\$0	\$0	\$0
	Fringe Benefits	\$0	\$0	\$0	\$0
	Travel	\$0	\$0	\$0	\$0
	Equipment	\$0	\$0	\$0	\$0
	Supplies	\$0	\$0	\$0	\$0
	Contractual	\$43,220.00	\$156,526.00		\$199,746.00
	Construction			\$299,965.00	\$299,965.00
	Other (include subawards)				
<b>Total Direct Costs</b>		\$43,220.00	\$156,526.00	\$299,965.00	\$499,711.00
<b>Indirect Costs</b>		\$2,161.00	\$7,826.30	\$14,998.25	\$24,995.55
<b>Total Budget</b>		\$70,381.00	\$292,902.30	\$443,53.25	\$806,806.55

**Construction** – Concrete Structures (>1 ft above grade) 80\$21,600 Remove/Recycle Existing Debris, clean pipe, construction materials: \$4,740; Erosion and Sediment Control: \$6,125; Stormwater Engineering Site: \$7,000; 18” Layer of Clean Fill: \$181,500; Regrading and Hydro seeding cap (2 acres): \$14,000; Paved Parking Lot (~0.25 acres), \$65,000.

**Contractual (WVVRP/QEP)** – Remedy design LRS VRP Application Fee: \$5,000; Supplemental Site Assessment Work Plan: \$4,500; Site Assessment Activities: \$60,925.90; Site Assessment Report: \$7,5000; Risk Assessment Report: \$10,000; Remedial Action Work Plan: \$7,500; Land Use Covenant: \$2,250; Remedy - MNA Monitoring: \$28,975.50; Oversight of Engineering Controls: \$6,250; Remediation Action Completion Report: \$5,000; Final Report and Request for Certificate of Completion: \$5,000; WVDEP Oversight Fees: \$9,000; PDES Storm Water/BMP Design: \$3,125; LUC Inspections: \$1,500; Contractual Engineer/Consultant Remedy design-engineering Surveying: \$9,500; Construction Documents Cap: \$7,500; Bidding/Procurement Remediation Contractors: \$7,500; Construction Administration: \$18,720

**Indirect Cost:** 5% De Minimus allowable rate, \$24,995.55. The indirect cost rate covers organizational expenses associated with implementing the grant; Additional indirect costs will be leveraged through UT.

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

WVLSC will track and summarize grant activities monthly and share them with project partners and in quarterly grant reports. Additionally, all environmental monitoring indicated by the RAWP will be recorded and shared with partners and updated in ACRES. These reports will be shared with UT and the grant work plan will be reviewed at status meetings to ensure timely completion. All information and leverage will be added ACRES at least quarterly.

**4.a. Programmatic Capability**

**4.a.i Organizational Structure**

WVLSC is a 501(c)3 organization, created to facilitate the redevelopment of former commercial, industrial, and mining properties to promote sustainable economic development in West Virginia. The WVLSC Board of Directors represents business, labor, and environmental organizations; state agencies, including WVDEP and the WV Department of Economic Development (WVDED). WVLSC has a robust set of internal processes which solicit expert guidance from board members and allow staff members to collaborate with them to achieve programmatic goals. Additionally, WVLSC practices the US Department of Labor's Good Job Principles, prioritizing stable wages; benefits; and diversity equity and inclusion practices. WVLSC prioritizes hiring firms who also prioritize these principles and when possible, hires locally.

#### **4.a.ii Description of Key Staff**

Taylor Bennett, Executive Director of WVLSC, has successfully implemented both an EPA Cleanup Grant and an EPA Assessment Grant. The Grants and Operations Officer has over 20 years' experience in drawing down, managing, and reporting on federal grants. WVLSC receives technical assistance from NBAC, adding capacity and expertise on remediation projects.

#### **4.a.iii.Acquiring Additional Resources**

WVLSC has a proven track record of securing funding, garnering \$1.6 million in Congressionally Directed Spending requests in the last 3 years, securing \$800,000 from EPA for Brownfield Assessment and Cleanup grants, and \$1.5 million from WVDED. WVLSC will also leverage additional expertise as needed through technical assistance from NBAC and our extensive professional networks. Procurement of all remediation and environmental consultants will be done in accordance with federal procurement guidelines and reporting will be maintained throughout the lifetime of the grant and WVLSC will ensure that all relevant regulations are followed.

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

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

WVLSC received an EPA Brownfields Assessment Grant in FY 2019 and an EPA Brownfields Assessment Grant for FY 2020

##### **(1.) Accomplishments**

WVLSC closed out a 2019 Assessment Grant in good standing and will do the same with a current Cleanup Grant before the end of 2023. The Assessment Grant resulted in ESAs for seven sites and one reuse plan and led to the receipt of an EPA Cleanup Grant by the City of Morgantown in FY 2023 for cleanup at White Park, a former petroleum tank farm. WVLSC's EPA Cleanup Grant FY 2020 resulted in the transformation of a former coal fired power plant into a productive and clean component of an existing industrial park. The redeveloped site boasts a new rail spur and road, as well as utility lines for businesses in the park, supporting approximately 2,300 jobs.

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

WVLSC maintained compliance with all EPA requirements for both past Assessment and Cleanup grants. The WVLSC Grants and Operations Officer is tasked with maintaining compliance for all grants and has over 20 years' experience doing so.

## **Threshold Criteria for EPA Brownfield Cleanup Grant West Virginia Land Stewardship Corporation**

### **1. Applicant Eligibility**

The West Virginia Land Stewardship Corporation (WVLSC) is a special-purpose nonprofit created by the West Virginia Legislature, with 501(c)(3) status. Please see attached status determination.

### **2. Previous Awards**

The proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

### **3. Expenditure of Existing Multipurpose Grant Funds**

The applicant does not have an open EPA Brownfields Multipurpose Grant.

### **4. Site Ownership**

The property is owned by the West Virginia Land Stewardship Corporation (WVLSC).

### **5. Basic Site Information**

- a) Site name & Address: Hazel-Atlas Glass, Railroad street Grafton WV, 26354.
- b) Site details: 6.26 acres broken up into 4 parcels, informally known as Hazel-Atlas.
- c) Owner: West Virginia Land Stewardship Corporation (WVLSC) owns fee simple title to the property.

### **6. Status & History of Contamination at the Site**

The Hazel-Atlas Glass site consists of approx. 6.26 acres which has been previously used for the manufacturing and production of tile and glass products, manufacturing of plastics, as well as metal fabrication and storage. Former structures have been removed from the site, leaving a large, relatively flat concrete and gravel covered area that is currently vacant and unused. Asbestos removal was performed in 2000. An oil pit found on the site in 2003 was found to have concerning levels of selenium and lead. The pit was remediated at that time.

However, contaminants remain on site which pose health and safety concerns for the surrounding community and inhibit site reuse. As a result of historic uses, significant contaminants are present on site. Three Volatile Organic Compounds (VOC's) (benzene, tetrachloroethene, trichlorethene) are considered Contaminants of Concern (COCs) for the surface and subsurface soil and two VOCs (trichloroethelene, vinyl chloride) are considered COCs for groundwater, both due to exceedances of De Minimis residential indoor air values. Additionally, Three VOCs (chloroform, trichloroethene, vinyl chloride) are considered COCs for groundwater due to the exceedance of groundwater RBCs.

Additional site characterization is needed to develop the remedial action work plan (RAWP) and is included in the Cleanup Grant application and budget. The cleanup plan will reduce risks from exposure to site contaminants through a combination of the following: 1) targeted contaminant removal, 2) institutional controls, and 3) environmental controls. This project will be enrolled in the WV Voluntary Remediation Program and will seek to secure a Certificate of Completion.

### **7. Brownfields Site Definition**

The subject property meets the definition of a brownfield site and is: a) not listed or proposed for listing on the National Priorities List; b) 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 c) not subject to the jurisdiction, custody, or control of the U.S. government.

## **8. Environmental Assessment Required for Cleanup Proposals**

The Hazel Atlas property was assessed in 2003 under a FY1998 Brownfields Assessment Grant. An Environmental Site Assessment, Baseline Human Health Risk Assessment, Ecological Evaluation, and Remedy and Selection were completed under the guidance of WVDEP-OER, by a West Virginia Licensed Remediation Specialist, following requirements established under the WV Voluntary Remediation and Redevelopment Act program.

In 2023, WVLSC obtained an updated Phase 1 and a draft ABCA to guide development of the RAWP. An objective of this grant will be to perform limited supplemental site assessment and risk assessment to evaluate feasibility of residential/recreational use at the site, and implement a combination of active remediation and institutional and engineering controls to secure a Certificate of Completion through the WV VRP.

## **9. Site Characterization**

Additional site characterization will be conducted on this site as a component of cleanup. A sufficient level of site characterization from the environmental site assessment will be performed by June 15, 2024 so remediation work can begin on the site. A letter from the WV DEP has been provided for this FY 24 Cleanup Grant application.

## **10. Enforcement or Other Actions**

There are no ongoing or anticipated environmental enforcement or other actions related to the site. When the site was assessed in 2003, the proposed remedy was to require non-residential future use of the site, and to restrict groundwater use at the site. However, these remedies were never implemented and land use restrictions were not placed on the site.

## **11. Sites Requiring a Property Specific Determination**

This site does not require a Property-Specific Determination.

## **12. Threshold Criteria Related to CERCLA/Petroleum Liability**

### **Property Ownership Eligibility - Hazardous Substance Sites**

### **Landowner Protections from CERCLA Liability**

#### **(1) Bona-fide Prospective Purchaser Liability**

##### **(a) Property Acquisition**

WVLSC acquired fee simple title to the surface of the subject property via a donation from Bullrushes, LLC, a private company, on November 8, 2023. The deed was recorded at the Taylor County Clerk's Office on November 9, 2023 Deed Book 394, Page 405. WVLSC has not had any relationships with prior owners of the subject property outside of negotiating the transfer of the property to its Land Bank, and therefore, is not liable for contamination.

##### **(b) Pre-purchase Inquiry**

Prior to acquiring the property, the WVLSC obtained a Phase I environmental site assessment (dated September 28, 2023) using ASTM E 1527-13 standard practice on the site. The Phase I ESA was performed for the benefit of the WVLSC by Downstream Strategies, LLC., a contractor engaged and paid by the Northern WV Brownfields Assistance Center, a program of the West Virginia University Research Corporation. The Phase I was performed by an Environmental Professional as defined in §312.10 of 40 CFR 312.

##### **(c) Timing and/or contribution toward hazardous substances disposal**

The WVLSC has never arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site. All disposal of hazardous substances at the site occurred prior to WVLSC's acquisition of the property.

**(d) Post-acquisition uses**

The WVLSLSC acquired the property on November 8, 2023. It sits idle and unused, as it has for many years. WVLSLSC has acquired this property for the primary purpose of overseeing its remediation so that it can be redeveloped to benefit the citizens and economy of Grafton.

**(e) Continuing Obligations**

There are no known imminent threats caused by the hazardous substances on the property. Previous owners took steps to stop the continuing release of substances by removing asbestos containing materials and remediating an oily pit. The purpose of WVLSLSC acquiring the property is to prevent any future threatened release by removing any additional sources of contamination. While there are no current institutional controls on the property, WVLSLSC will prevent or limit exposure to any previously released hazardous substances by limiting access to the property. The property is currently fenced and is located outside residential neighborhoods in a primarily industrial part of town, reducing foot traffic and possible trespassing. The WVLSLSC will: (i) comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls; (ii) assist and cooperate with those performing the cleanup and provide access to the property; (iii) comply with any CERCLA information requests and administrative subpoenas that have or may be issued in connection with the property, and provide all legally required notices; (iv) not impede performance of a response action or natural resource restoration.

**13. Cleanup Authority and Oversight Structure**

**a. Cleanup Oversight**

Cleanup of the former Hazel-Atlas property will be performed under the direction of a WV VRP Qualified Environmental Professional (QEP). QEP services will be acquired through a competitive procurement process consistent with 2 CFR 200 procurement guidelines. The WVLSLSC Executive Director has successfully overseen the implementation of an EPA Assessment Grant received in 2019 and an EPA BF Cleanup Grant awarded in 2020. This experience has provided the capability to understand the recommendations of the QEP and ability to coordinate with the QEP and contractors on the implementation of cleanup activities. As necessary for site cleanup activities, a remediation contractor with experience working on sites containing hazardous substances will be engaged through a competitive Request for Quotations bid process. The WVLSLSC will consult with the EPA throughout the cleanup process and plans to enroll in the WV VRP to ensure the cleanup is fully protective of human health and the environment.

**b. Access to adjacent properties**

Remediation activities are not anticipated to impact adjacent sites. However, should WVLSLSC or any of its agents need access to adjacent properties in the course of remediation activities, WVLSLSC will secure appropriate site access agreements with adjacent property owners and provide appropriate documentation.

**14. Community Notification**

**a. Draft analysis of Brownfields Cleanup Alternative (ABCA)**

WVLSLSC has placed a draft Analysis of Brownfield Cleanup Alternatives (ABCA) at the Grafton Public Library for public review and comment between October 20th and November 12th and advertised the same in a legal ad published on October 20th.

**b. Community Conversation Invitation**

- i. Community Partner, Unleash Tygart, published a video interview about the application and invited all relevant stakeholders and community members to attend the public meeting. They also provided the Draft ABCA in a downloadable format and invited community members to submit comments to them via email to be read on their behalf at the Public Meeting.
- c. Community Notification Ad**

WVLSC published a legal ad in the Weekender by the Exponent Telegram, the Taylor County, WV local newspaper, on October 20th stating its intent to apply for a grant, noting the date and time for the public meeting, and indicating where and when the draft ABCA would be available for public review.
- d. Public Meeting**

WVLSC, along with partners Unleash Tygart and the Northern WV Brownfields Assistance Center (NBAC) held a public meeting to formally announce the intent to apply for an EPA Cleanup Grant and to receive comments on the ABCA on November 3, 2023 at 5:00 pm. The meeting was held at the Taylor County Development Authority in Grafton.
- e. Submission of Community Notification Documents**

The following items have been attached with this application:

- a copy of the draft ABCA(s);
- a copy of the ad that demonstrates notification to the public and solicitation for comments on the application;
- An agenda for the public meeting
- the comments or a summary of the comments received;
- the applicant's response to those public comments;
- meeting notes or summary from the public meeting(s); and
- meeting sign-in sheets.

## **15. Contractors and Named Subrecipients**

Not applicable.





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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

Ms. Taylor Bennett, Executive Director  
West Virginia Land Stewardship Corporation  
112 Adams Street, Suite 205  
Fairmont, WV 26554

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

Dear Ms. Bennett,

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 West Virginia Land Stewardship Corporation plans to conduct cleanup of the Hazel-Atlas Glass brownfield site located in Grafton, WV.

The WVDEP affirms that the Hazel-Atlas Glass 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 West Virginia Land Stewardship Corporation 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 former Hazel-Atlas Glass factory was historically a mainstay of the largest glass company in the world and the City of Grafton, WV's economy. Currently, this site is a vacant and contaminated piece of property located directly adjacent to the Tygart River, presenting a host of challenges to the community,

as well as the opportunity to be the cornerstone of Grafton's riverfront redevelopment. 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 Hazel-Atlas Glass 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, looping initial "J".

Jackson Porter  
Brownfields Specialist