



***WHEELING CLAY SCHOOL BROWNFIELD CLEANUP
NARRATIVE INFORMATION SHEET***

1. Applicant Identification:
 - a. City of Wheeling, West Virginia
1500 Chapline Street
Wheeling, WV 26003

2. Funding Requested
 - a. Grant Type: Single Site Cleanup
 - b. Federal Funds Requested
 - i. \$ 500,000
 - ii. The City will provide the \$31,641 in cash and in-kind match to complete the proposed scope of work.

3. Location:
 - a. City of Wheeling
 - b. Ohio County
 - c. West Virginia

4. Property Information:
 - a. Clay School site, 131 15th Street, Wheeling, WV 26003

5. Contacts
 - a. Project Director
 - b. Name: Nancy Prager
 - c. Phone Number: 304.234.3701
 - d. Email Address: nprager@wheelingwv.gov
 - e. Mailing Address: 1500 Chapline Street #301, Wheeling WV 26003

6. Chief Executive/Highest Ranking Elected Official
7. Name: Mayor Glenn Elliot
8. Phone Number: 304.234.6401
9. Email Address: gelliot@wheelingwv.gov
10. Mailing Address: 1500 Chapline Street #301, Wheeling WV 26003

11. City Population: 27,052

12. Other Factors Checklist Please identify which of the below items apply to your community/proposed project. If none of the Other Factors are applicable to your

community/proposed project, please provide a statement to that effect.

Other Factors	Page #
Community population is 10,000 or less.	n/a
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	n/a
The proposed brownfield site(s) is impacted by mine-scarred land.	n/a
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.	Page 3 & 4
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).	n/a
The proposed site(s) is in a federally designated flood plain.	n/a
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	n/a
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	Page 4
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	Page 3
The target area(s) is located within a community in which coal-fired power plant has recently closed (2013 or later) or is closing.	n/a

8. Releasing Copies of Applications: The City of Wheeling affirms that it has not included any confidential, privileged, or sensitive information in this application and would support the EPA's efforts for transparency by making the application publicly available for a period of time after the selected applications are announced.

WHEELING, WV BROWNFIELDS CLEANUP – CLAY SCHOOL

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields i. Overview of Brownfield Challenges and Description of Target Area:

Located in the northern panhandle of WV, the City of Wheeling is the seat of Ohio County as well as the principal city of the Wheeling, WV-OH Metropolitan Statistical Area. Wheeling developed as a commercial and industrial center and hub of some of the earliest transportation infrastructure in America due to its strategic location at the confluence of the Ohio River, National Road, and the early B&O Railroad, and its proximity to Pittsburgh (55 miles), Columbus (120 miles), and Cincinnati (130 miles). As iron and steel factories developed on the banks of the Ohio River and other industries such as glass works, cigar making, and iron nail manufacturing thrived, Wheeling's economy thrived, and its population grew. The city continued to prosper into the early 20th century until economic restructuring following World War II began a cycle of steady population decline which has continued to plague the city into the 21st century, from a population high of 61,000 in the 1930s to less than 27,000 today.

Difficult declines in the industrial base beginning in 1970 resulted in Wheeling residents out-migrating to other cities for employment opportunities. Negative conditions were further aggravated in the 1990s when multiple key industries including steel manufacturing, coal mining, glass production, and others experienced sharp declines. Many of the properties that once housed and supported thriving businesses and industries now sit empty and deteriorating. This blight not only detracts from neighborhood investment but also negatively impacts residents' quality of life and poses risks to human health and safety.

One site, the historic Clay School, served the Ohio County Public School system for nearly 50 years before having to shutter in the 1990s. This facility was constructed to serve the K-8 grade youth of the East Wheeling. East Wheeling, located directly east of the downtown, developed as neighborhoods began to radiate from Wheeling's downtown commercial core. East Wheeling is within Ohio County Census Tract 27 with a population of approximately 996 residents and is a highly diverse, primarily residential, area.

Since the school district closed the site, it has sat idle despite several attempts to bring a new life to the hulking building, but no ventures have ever brought true redevelopment of the property. Wheeling has taken major and effective steps to redevelop brownfields across the City, and purchased the Clay School in January 2022, to promote its rehabilitation. With the support of EPA Brownfield Cleanup funding, Wheeling will transform this 140,551 sq. ft. blighted and polluted Clay School Site brownfield back to productive use to once again serve as a hub for the community, foster future investments and revitalization, and help to create a more vibrant and safer environment for area families.

ii. Description of the Proposed Brownfield Site(s): The **Clay School** is located at 131 15th Street, Wheeling city, Ohio County, WV, 26003. The structure was completed in 1943 for Ohio County Public School students. This large, 140,511 sq. ft. building features a three-story, blond brick facade with a flat roof and brick/cement block foundation. The school is also one of the 300 contributing structures to the East Wheeling Historic District (NRS 99001402) and was constructed to feature 35 classrooms, a cafeteria, an auditorium, and a gymnasium to support the education of elementary and junior high school students.

Following its closure in the 1990s, the School District left the site idle until eventually selling it in 2004 with the buyer's intention of transforming the structure into a science and community center. However, redevelopment never took place and the property failed to gain significant interest from a potential buyer since being placed on the open market in 2013. Now, with over 30 years of deferred maintenance and upkeep, the building is in poor condition, serious disrepair, and is not suitable for occupation. The continued deterioration of the structure could increase potential exposure to hazardous substances. In

2022, the City of Wheeling acquired the 0.661-acre property, occupied almost solely by the singular school structure within a singular parcel (Parcel ID 35-10-0W51-0627-0000) to return the site to productive use. Prior to acquisition, the City had a Phase I Environmental Site Assessment (ESA) and Hazardous Materials Survey performed under an EPA Community-Wide Assessment Grant by the Belomar Regional Council.

Broken windows, brick debris, water intrusion, collapsing ceilings, peeling paint, and mold were all noted during the site visit, as well as significant asbestos-containing materials (ACM), hazardous materials, mold, and lead-based paint (LBP). The Hazardous Materials Survey found ACM present in the air-cell pipe insulation, pipe wrap, floor tiles, vinyl stair treads, rooftop end-cap mastic and curb flashing, vinyl cove base, vinyl floor tile and its associated mastic, and door masonry, sealant, ballasts; an old transformer is presumed to be PCB-containing, fluorescent light tubes are presumed to contain mercury; and chemical products including lead acid batteries, paint, detergent, emulsifier, antifreeze, glycerin, cleaners, cathode-ray tubes, smoke detectors, laboratory chemicals, and unlabeled liquids are scattered in the building. Water intrusion was also present and has resulted in damage to the ceilings, floors, and walls. Several rooms were open to the elements via shattered windows, and the floors were completely covered in unhealthy mold and vegetative growth. The continued growth of mold in these moist conditions is a concern. The City now seeks resources to clean up the property for planned reuse as a community center for recreation/education, and economic development so the site can once again serve as a community asset and hub for residential activity.

b. Revitalization of the Target Area i. Reuse Strategy and Alignment with Revitalization Plans: The reuse strategy proposed for the site is as a community center and recreation facility. The planned reuse outlined in this application is based on community input and final plans will be determined by further input from the community on which specific uses will be most beneficial but will likely include a combination of public activities and leasable activities that honor the community-based uses the site has served.

EPA funds would support ACM removal and disposal, LBP testing and removal, and hazardous materials disposal before building renovation and reuse. The site is not located in a federally designated flood plain, and removal of ACM and other accumulated hazardous wastes is the preferred and recommended alternative as it allows for reuse to proceed most quickly with little to no risk of ongoing or long-term remedial or monitoring obligations. This alternative will properly eliminate the presence of ACM and other waste materials and allow for rapid redevelopment after activity completion. This alternative also provides the safest environment for renovation by completely removing hazardous materials to eliminate future risk. This preferred alternative protects human health and the environment while providing the community and future site tenants critical information, involvement, and security in its redevelopment. This preferred cleanup approach is also acceptable to and supported by the WV Department of Environmental Protection (WVDEP).

The cleanup and reuse of the Clay School will complement existing efforts to revitalize the East Wheeling community, which is within easy walking distance of Downtown and Center Wheeling. This planned brownfield cleanup effort is also highly consistent with Wheeling's Comprehensive Plan, "Envision Wheeling Plan" which has a heavy emphasis on the redevelopment of brownfield sites and continued partnerships with social services and community organizations to reinvest in the East Wheeling neighborhood. Continued rehabilitation and infill development efforts that reinvigorate the neighborhood, investment in new development that maintains the character of the neighborhood, and small-scale mixed-use development were also identified as priorities for the East Wheeling area within the Plan.

Therefore, the City, as the fee owner of the Clay School, is strongly committed to seeing the property remediated and redeveloped into productive use to realize the significant benefits and successes that many of the surrounding and nearby properties have experienced that complement the area's diversity, proximity to downtown, strong community organizations, neighborhood pride, and emerging amenities.

ii. Outcomes and Benefits of Reuse Strategy: East Wheeling, the City, and the region will benefit from the infusion of EPA Cleanup funds to transform the site into a community center and community hub. The community and economic investment potential from the injection of EPA Brownfield dollars will complement the multimillion-dollar J.B. Chambers Memorial Park across 15th Street, the Nelson Jordan Youth Center, the Wheeling Heritage Trail, and a dog park which are all near the site. Redevelopment will help create a more vibrant and safer environment for families who live in the area, attracting new residents, improving property values, enhancing quality of life, and improving health outcomes.

This site will serve as a major catalyst for existing assets and will further facilitate investments and improve quality of life in the East Wheeling neighborhood. The Clay School is situated directly across 15th Street from the J.B. Chambers Memorial Recreation Park. The \$3.3 million sports complex is relatively new – dedicated in 2015 – and boasts fields for soccer, lacrosse, football, baseball, softball, and seating for 538 with ADA accommodations that are used everyday between mid-February to late December by citizens of all ages. Adjacent to the park is the Elks Playground, another newer addition to the East Wheeling neighborhood. Recreational opportunities include new programming to the site from the nearby Nelson Jordan Center, the City's only recreation center. Repurposing the site would allow for a new indoor recreation center while also providing restroom facilities for people visiting the sports complex, locker rooms for teams that use the fields, and other accommodations.

Recreational facilities such as the one proposed at the Clay School have the versatility to accommodate the various needs of the East Wheeling and surrounding population. A Clay School community center could serve as a refuge for youth and other residents, provide an opportunity to encourage physical activity and offer new educational and social spaces. The attraction of the center can draw more interest and investment to East Wheeling, encouraging new residency, encouraging redevelopment of other nearby and historic sites, and boost property values. Further, restoring the structure would pay homage to the site's historic use as a school and a place that promotes personal and intellectual development.

c. Strategy for Leveraging Resources **i. Resources Needed for Site Characterization:** While the city does not expect additional funds will be needed for site characterization, the WVDEP has encouraged the City to seek resources from the state's \$2 million Brownfield Community-Wide Assessment grant for additional site characterization of needed.

ii. Resources Needed for Site Remediation: Wheeling has continued to develop a solid track record of leveraging resources for brownfield assessment, remediation, and reuse and is committed to working with its stakeholders and partners to take advantage of all available resources to support the successful reuse of brownfield properties within its jurisdiction. The initial assessment of this site was conducted with funds provided by the Belomar Regional Council through an existing EPA Brownfield Assessment Grant. An ABCA was also completed to identify the most cost-effective remedial approach that would support the planned redevelopment effort. The City does not anticipate additional funding for remediation if the requested amount under the EPA Cleanup grant application is awarded, but could seek WVDEP Brownfield Revolving Loan funds if needed, building on Wheeling's effective track record with RLF.

iii. Resources Needed for Site Reuse: Wheeling has extensive experience levering federal dollars with public and private resources. EPA Brownfield Assessment resources were used to conduct a Phase I ESA

and Hazardous Building Materials Survey of the site and the City has begun identifying other resources to leverage and complement cleanup funds. The City plans to build on EPA dollars to seek and deploy resources including New Market Tax Credits, Historic Preservation Tax Credits, and the city's HUD CDBG Entitlement Community funds. Wheeling will also seek to utilize support from foundations and philanthropic organizations to bring the community center vision to fruition.

iv. Use of Existing Infrastructure: The Clay School redevelopment will effectively utilize available, existing building stock to support the smart reuse of infrastructure and public resources that support compact, full-service neighborhoods in long-established, historic districts. The site is well-situated as a hub for community recreation. When completed, the Clay School will complement the adjacent Recreation Park, the Nelson Jordan Center, the Wheeling Heritage Trail, a dog park, several playgrounds, and other key community assets. The adaptive reuse of this large, historic structure would restore a culturally significant site that would otherwise decay or be demolished. This reuse also minimizes the need for new materials and reduces the carbon footprint associated with demolition and new build.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need i. The Community's Need for Funding: Cleanup activities will help address longstanding environmental contamination concerns that threaten the health of socio-economically vulnerable residents in Tract 27. This depressed tract continues to struggle with high poverty, high unemployment, and low labor force participation, and the area lags the city, region, and country in key community and individual health indicators. Tract 27 faces a high concentration of poverty with more than half of all residents, 55.9%, living below the poverty line. This rate is more than triple Wheeling (15.1%), Ohio County (13.5%), and U.S. (12.3%). This area is also more racially diverse than the City with more than 12% of residents identifying as Black or African American, compared to roughly 4% across Wheeling. With an average unemployment rate of 5.4% and a labor force participation rate of 57.4%, 0.9% above and 6.2% below the U.S. averages, Wheeling suffers from low income levels suggesting that jobs don't match resident skill level, education, or availability of work. In Tract 27, the median household income is just \$14,630, significantly lower than the city's at \$43,483 and less than 25% of the U.S. median. Due to a lack of available resources, the extent of brownfield challenges across the city, and the significant cost of implementing the proposed revitalization strategy, Wheeling is unable to pursue the level of funding needed to implement this vision on its own.

ii. Threats to Sensitive Populations: (1) Health or Welfare of Sensitive Populations: As Wheeling grew, neighborhoods rose around factories, mines, and manufacturers. These areas stretch along the Ohio River and Wheeling Creek and have historically been close to residential areas as employees looked to live close to their employers. East Wheeling is primarily residential within walking distance of Downtown and Central Wheeling and is bisected by US 250 and Wheeling Creek, which run parallel. East Wheeling has a higher minority population than surrounding communities and has long struggled with a higher prevalence of poverty, crime, vacancy, population decline, and blight amplified by outmigration and disinvestment. Household incomes are lower than a quarter of U.S. income levels, and more than half of all residents live below the poverty line. In addition, this area is classified by the U.S. Department of Agriculture (USDA) as a low-income, low-access food desert. The socioeconomic disparities these populations face synergistically and cumulatively make it difficult for the community to respond to health needs and threats posed by environmental contamination at brownfield sites.

The infusion of investments for site cleanup would not only help to remediate environmental contaminants that threaten the health of vulnerable populations, but also support the ongoing and future health and wellness of all residents by increasing access to critical resources including opportunities for physical activity. In 2018, West Virginia ranked eighth highest nationally in annual deaths due to cardiovascular

disease and, according to the 2019 Wheeling Community Health Assessment, the region has increased rates of both hypertension and diabetes. For community residents, the conversion of the Clay School as a community recreation center in East Wheeling, a highly distressed community, will encourage physical health and wellness while helping to address disparities in environmental contaminant exposure.

Site remediation will aid in community health, as the school's present condition presents exposure risk to asbestos, hazardous substances, and mold. The ACM used throughout the building is in poor condition and could cause the release of asbestos fibers if further disturbed. Asbestos fibers do not dissolve in water, do not evaporate into the air, and may cause lifelong health issues such as cancer. Additionally, exposure to the chemical products found onsite including lead acid batteries, paint, detergent, emulsifier, antifreeze, glycerin, cleaners, cathode-ray tubes, smoke detectors, and laboratory chemicals can cause adverse health effects such as poisoning, breathing problems, skin rashes, allergic reactions, cancer, and other health concerns. Under current conditions, risk pathways include ingestion and inhalation of contaminants by site visitors and/or trespassers. Project activities will effectively and safely remove these contaminants from the site, eliminating potential impacts on human health and the environment.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: The EPA Toxics Release Inventory (TRI), ranked the Wheeling MSA 225 out of 909 for urban areas in the country based on total releases (24,646,331 lbs.) of toxics that may pose a threat to human health and the environment per square mile. In the one-mile radius directly around the site, the EPA EJScreen ranked the area in the 97 percentile for hazardous waste proximity, 97 percentile for PM 2.5, and 96 percentile for traffic proximity in the State of West Virginia. As a result of these and other environmental and health factors, Ohio County has a mortality rate (895.66 per 100,000) that outpaces the United States rate, based on University of Washington 2020 Institute for Health and Evaluation metrics. The area also has a higher incidence of cancer. CDC U.S. Cancer Statistics found that from 2013 to 2017, there were 1,399 new cases of cancer, or 453 cases per 100,000, higher than the national rate of 448.7 per 100,000. During this time, 605 people died of cancer in the County. The disparities in the burden of ill health caused by environmental exposure and susceptibility are also reflected in the rate of disabilities and the life expectancy estimates for Ohio County Tracts 27. More than 40% of the population live with a disability, more than triple the national rate of 12.6%. Based on the CDC U.S. Small-area Life Expectancy Estimates Project (USALEEP) for the period from 2010 to 2015, the life expectancy at birth across the two downtown waterfront census tracts was in the lowest quartile of life expectancies at birth (56.3-75.7 years) at 70.4 years in Tract 27.

(3) Environmental Justice: (a) Identification of Environmental Justice Issues: In 2020, the City of Wheeling became the first city in West Virginia to declare, by unanimous Council vote, that racism is a public health emergency that requires proactive community action. The health threats posed by exposure to environmental contaminants have been unequally distributed in areas of poverty, and for individuals who live in increasingly aging and blighted areas. These communities have a high concentration of brownfield properties and much like their occupants, are also older and greyer. More than 60% of homes in Tract 27 were built before 1939 with a vacancy rate of 24.5%. In addition to high, pervasive poverty and economic challenges, and a higher concentration of minority families, Ohio County is also one of the most densely populated tracts in WV, at 418.5 people/mi². These factors combine to disproportionately impact compact, urban populations, making brownfield remediation and revitalization critical for social justice. As a result, this tract has been identified as disadvantaged in the Climate & Economic Justice Screening Tool (CEJST).

(b) Advancing Environmental Justice: The City has taken key steps to involve the community in the robust decision-making process and has provided mechanisms to ensure that all community members have access to information and can participate in the discussion. The focus on reuse as a public space will enhance the

overall quality of life in the community, provide a recreational area, and contribute to neighborhood stabilization and sustainability. The City will continue to transparently communicate throughout the entire process to keep individuals informed about project developments, timelines, and potential impacts.

b. Community Engagement: i. Project Involvement: The City has engaged with a diverse group of stakeholders who are familiar with local sites and the East Wheeling neighborhood and have relevant brownfield remediation expertise to help guide the successful completion of the Clay School site redevelopment. This group includes the Belomar Regional Council, who funded a Phase I ESA prior to the city's acquisition of the site with resources from an EPA Brownfield Community-Wide Assessment grant; the Wheeling National Heritage Area Corporation, which supports the preservation and development of historic districts and public spaces throughout the city and maintains historic data on the site; Tipping Point, the development plan consultant leading conceptual redevelopment planning and community engagement; and Men of Change, a community group that aims to empower, uplift, support, mentor, and educate the community, particularly African Americans, and has served as community advisors and team leads to better quantify proposed redevelopment scenarios at the site. This group will continue to be engaged in the cleanup and reuse of the Clay School throughout the execution of this project and beyond.

ii. Project Roles: Engagement has resulted in strong partnerships with entities across the region. State, regional, and local organizations that will play a role in the execution of this cleanup grant include:

Organization	Point of contact (name, email & phone)	Specific involvement in the project or assistance provided
Belomar Regional Council (Belomar)	Scott Hicks, Executive Director, 202.242.1800, hicks@belomar.org	EPA Assessment grantee, provided funding for Phase I ESA & HMR
WV Brownfields Assistance Center at WVU	Carrie Staton, Executive Director, 304.293.7071, Carrie.Staton@mail.wvu.edu	Provide technical assistance, staff, in-kind reuse planning and management assistance, and guidance throughout cleanup
Wheeling National Heritage Area Corporation	Scott Schenerlein, Executive Director; 304.280.0805, sschenerlein@wheelingheritage.org	Historical data and historic preservation expertise; outreach specialists
Regional Economic Development Partnership	Josh Jefferson, Executive Director, 304.232.7722, jjefferson@redp.org	Community input provider and regional economic development expert
Men of Change/YWCA Wheeling	Ron Scott Jr., Cultural Diversity & Community Outreach Director, 304.780.6182, OVMenofChange@gmail.com	Community input provider, community advisors and facilitators, team leads on redevelopment scenario development

iii. Incorporating Community Input: The Clay School has been the focus of robust community collaboration, visioning, planning, and input, and the City will continue to seek community input throughout the cleanup and site redevelopment process. The City has been leading a community-driven approach to identifying the reuse strategy for the site. In December 2022, the City engaged the firm, Tipping Point, to guide a community-led site redevelopment and revitalization. To date, outreach has involved several community events including a community block party and an online survey that received over 1,000 responses. This engagement is scheduled to continue through December 2023 after the public has had the opportunity to weigh in on the design and cost for various development scenarios.

The City will continue to provide timely updates on project progress via its website, and will ensure open communication, outreach, and engagement with the citizens who live and work around the site with information on opportunities to participate, plans developed with funds, timelines for cleanup activities, and contact information of each project team member. The project team will also connect with the public through community-based stakeholder engagement, regular public meetings, neighborhood association gatherings, newsletters including Wheeling Heritage’s “Weelunk” e-newsletter, social media, print materials, and other outreach designed to gather public input on activities and with opportunities for public comment. Project progress will be reported at quarterly City Council meetings and minutes will be kept and made available for review.

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

a. Proposed Cleanup Plan: Wheeling proposes remediation via the removal and disposal of ACM, LBP testing and removal, and hazardous materials disposal. ACM removal will be undertaken by licensed asbestos abatement contractors who will employ engineering controls to control and reduce the quantity of contaminants released to the environment during the removal activities. These include contaminant barriers and decontamination processes and potentially using wet removal techniques, encapsulation/enclosure techniques, and HEPA-equipped vacuum cleaners where site conditions warrant. If found, LBP would be mitigated via encapsulation. Proper preparation of the work areas is required, as is the suitability of surfaces for application of lead-neutralizing paint before encapsulation. Containers of chemicals fluorescent light bulbs and ballast are relatively easy to remove and dispose of. Access to the basement will require water removal, followed by further ACM and LBP testing. ACM abatement and LBP mitigation in the basement will require water removal and stormwater management unless water infiltration can be stopped before the cleanup. Stormwater controls would prevent future infiltration into the basement, eliminate the transport of hazardous substances, and protect human health.

b. Description of Tasks/Activities and Outputs: Wheeling and its partners will ensure the project achieves intended outputs and meets intended goals at the Clay School brownfield site, including:

<p>Task 1 – Program Management: The Project Manager will provide programmatic oversight and manage project team staffing. The City, led by the Project Manager, will competitively procure a WV Licensed Remediation Specialist (LRS) (which is a Qualified Environmental Professional (QEP)) to oversee and direct all cleanup activities, including onsite inspection and testing. This individual will assist the Project Manager in procuring and supervising an environmental remediation contractor to complete cleanup activities necessary to eliminate exposure pathways and protect human health. Following procurement, a kickoff meeting will be held. The project team, consisting of the Project Manager, Coordinator, LRS/QEP, and contractor, alongside project partners, will proceed with monthly meetings for the remainder of the period of performance to ensure the project continues to move forward on schedule, on time, and within budget. Based on direct discussion with WVDEP, the City does not intend to enroll the site in the State’s VRP as hazardous constituents have only been found within the building; however, the City will work closely with WVDEP throughout the cleanup process and will move the site into the VRP if additional potential hazards are discovered.</p>
<p>i. Anticipated Project Schedule: Grant Term</p>
<p>ii. Task/Activity Lead(s): Project Manager and QEP</p>
<p>iii. Outputs:</p> <ul style="list-style-type: none"> • Project team determined • QEP Procured • Project Kick-off Meeting • Project update Meetings • Personnel Costs: 300hrs of city staff/project manager to provide project oversight, \$40/hr salary = \$12,000

<ul style="list-style-type: none"> • Travel = \$2,000 for one staff member to attend the National Brownfields Conference and WV Brownfields Conferences • Contractual: QEP = \$6,000
<p>Task 2 – Health & Safety Plan: The QEP will oversee the creation of a Health and Safety Plan (HASP) per relevant Occupational Safety and Health Administration (OSHA) guidelines to ensure that all work by the QEP and their subcontractors is done so in a manner that protects on-site workers and the public.</p>
<p>i. Anticipated Project Schedule: Month 1</p>
<p>ii. Task/Activity Lead(s): QEP</p>
<p>iii. Outputs: site-specific HASP (Contractual = \$2,500)</p>
<p>Task 3 – Procurement of Remediation Contractor: The Project Manager assisted by the QEP will manage the procurement process in accordance with applicable local, state, and federal laws and regulations. The QEP will finalize A&E and prepare project-specific bid specifications and bid documents, oversee a mandatory pre-bid site meeting, provide written answers to questions received by the bidders, evaluate and rank bids, and present professional opinions regarding bid scopes and costs to the Project Manager for consideration and selection of the Remediation Contractor.</p>
<p>i. Anticipated Project Schedule: Months 2 through 8</p>
<p>ii. Task/Activity Lead(s): Project Manager and QEP</p>
<p>Outputs:</p> <ul style="list-style-type: none"> • Bid Documents and Specifications • Public Bid Announcement (Request for Bids) • Pre-bid meeting log and notes • Bidder Questions and Answer Documents • Professional Opinion of Bid Scopes • Professional Opinion of Bid Costs • Award of Contract • Contractual: QEP = \$31,957
<p>Task 4 – Removal of ACM, LBP, & Hazardous Materials Disposal: The selected remediation contractor will be responsible for all removal, environmental controls, LBP encapsulation, waste management, removal, transportation, and disposal, site restoration, associated permits and approvals, air monitoring, health and safety of its employees and subcontractors, provision of financial assurance, and adherence to all bid specifications. The QEP will provide field oversight, ensure all bid requirements are satisfied, review contractor invoices, review change orders, and act as the owner representative throughout the contracted work. The QEP will conduct confirmatory sampling and create contract closeout documents for execution by the owner and contractor.</p>
<p>i. Anticipated Project Schedule: Months 12 to 18</p>
<p>ii. Task/Activity Lead(s): QEP, Project Manager</p>
<p>iii. Outputs:</p> <ul style="list-style-type: none"> • Daily Field Reports by QEP to document Contractor work and bid adherence • Approval / Disapproval documents for Contractor Pay Applications • Quantity of ACM Removal & Disposal, LBP Encapsulation, Hazardous Materials Disposal • Percent Complete Reports • Project Punch Lists • Contract Closeout Documents • Contractual = \$463,441 (Remediation Contractor = \$431,441; QEP = \$32,243)
<p>Task 5 – Project Closure Report/Regulatory Coordination: At project conclusion, the QEP will create a project closure report that will document the remediation activities conducted. This report will be retained by the Project Manager and may be shared with the WVDEP to document waste removal.</p>

i. Anticipated Project Schedule: Months 18 to 21
ii. Task/Activity Lead(s): QEP
iii. Outputs: Project Closure Document (Contractual = \$5,000)

c. Cost Estimates: The removal of ACM and wastes allows for immediate redevelopment and is the most cost-effective approach. These activities will be a one-time expense to complete the remediation. The \$31,641 in costs which exceed the \$500,000 EPA grant requested here, will be covered by the City of Wheeling, as documented in the attached City commitment letter.

Budget Categories	Project Tasks					TOTAL
Programmatic Costs Only	Task 1	Task 2	Task 3	Task 4	Task 5	TOTAL
Personnel	\$12,000					\$12,000
Travel	\$2,000					\$2,000
Equipment						
Supplies						
Contractual	\$6,000	\$2,500	\$31,957	\$472,184	\$5,000	\$517,641
Construction						
Other						
TOTAL	\$20,000	\$2,500	\$31,957	\$472,184	\$5,000	\$531,641
<i>Total Federal Share</i>	<i>\$6,000</i>	<i>\$2,500</i>	<i>\$14,316</i>	<i>\$472,184</i>	<i>\$5,000</i>	<i>\$500,000</i>
<i>Total Cost Share</i>	<i>\$14,000</i>	<i>\$0</i>	<i>\$17,641</i>	<i>\$0</i>	<i>\$0</i>	<i>\$31,641</i>

d. Measuring Environmental Progress and Results: The project manager will systematically track and measure progress and will appoint staff dedicated to ensuring that outputs and outcomes are accurately tracked, analyzed, and reported. Internal and/or consultant project management software will help ensure that cleanup activities are moving along, and that project outputs and outcomes are being achieved. Output and outcome data will be routinely entered into ACRES. The project team will ensure that the project is meeting its scheduled milestones and actions will be taken to correct and steer the lack of progress.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability i. Organizational Structure: Wheeling’s Department of Economic and Community will oversee the project and in coordination with the Licensed Remediation Specialists, project consultants, regional and community partners, and private sector stakeholders.

ii. Description of Key Staff: Nancy Prager, Director of Economic and Community Development, will serve as the project director and fund manager. Nancy has 25 years of experience with the City including oversight of many EPA and WVDEP projects. Nancy and her department have experience with the implementation of federal grant awards and administering Wheeling’s Community Development Block Grant and Home Programs, including processing pay requests, preparing sub-recipient contracts, monitoring sub-recipients, preparing the 5-Yr Consolidated Plan, Annual Action Plans, ERR’s, Consolidated Performance and Annual Evaluation Reports (CAPER) and day-to-day oversight.

Melissa Thompson will support compliance with plans and regulations. Melissa is a Community Development Specialist with 20+ years of experience with the City, including substantial brownfield project management. She has also worked extensively with the Community Development Block Grant Program as well as the HOME Program, and has administered EPA brownfield grants including a 1998 EPA Assessment Demonstration Pilot. Staff leads will report to and coordinate with City Manager Robert Herron, who has been a city manager for 32+ years, including 18 in Wheeling. He has substantial experience with brownfields, grants management, project financing, infrastructure, land use and

development, and other skills needed to support the team. These efforts resulted in the assessment, reuse planning, cleanup, and economic redevelopment of several brownfield sites for commercial, industrial, residential, and public reuse across Wheeling, since the earliest days of the EPA program.

iii. Acquiring Additional Resources: Competitive procurement will be used to contract with highly qualified environmental consultants, engineers, and remediation specialists to undertake cleanup activities and address project technical requirements. The project team will ensure that contracts, including consultant contracts, and cost and price analyses, are completed to the extent required by 2 CFR Part 200 as well as procurement standards mandated by the WV State Code. The City has a robust relationship with the WV Brownfields Assistance Center at WVU, which has decades of experience with brownfield redevelopment projects and the technical expertise to support Clay School cleanup activities.

b. Past Performance and Accomplishments: i. Currently Has or Previously Received an EPA Brownfields Grant: (1) Accomplishments: Wheeling was among the first communities to secure Brownfields Assessment funds. In 1998, the City secured a \$200,000 EPA Brownfields Pilot Assessment grant to develop case studies of landowner/cooperator development efforts and target sites for site characterization and cleanup. With these dollars, the City assessed and transformed brownfield sites across the community including the WV Northern Community College campus, a physical rehab center, a retail hub, and other developments that leveraged hundreds of millions and created more than 800+ new jobs. The transformation of the abandoned Wheeling Stamping Building into a global operations and technology center for an international law firm supported 250 new jobs, is a national model. Moreover, former CSX and Pavilack properties utilized \$70,000 in EPA Brownfields Assessment Pilot funds to undertake assessment activities and determine that cleanup was required. This property has since leveraged approximately \$18.5 million in funds and created 175 jobs from the positions at the new Lowe's store which now sits on the site. Most recently, the city secured a \$345,000 Brownfield Cleanup grant to transform the Robrecht site, a former railroad right-of-way, into a community park and trailhead. All outputs and outcomes are accurately reflected in ACRES at the time of this application submission.

(2) Compliance with Grant Requirements: Wheeling's history of timely reporting and effectiveness has been borne out through successful federal single audit and EPA-specific audits as well as audits for other federal and non-federal grants including the HUD and the DOJ. Wheeling has consistently followed workplans, stayed on schedule, met milestones, submitted reporting, met all grant terms and has never been cited for any adverse audit findings.

***CITY OF WHEELING, WV
CLAY SCHOOL CLEANUP GRANT APPLICATION
THRESHOLD CRITERIA***

Name of Applicant: The City of Wheeling, West Virginia

1. **Applicant Eligibility:** Incorporated in 1836, the City of Wheeling is a unit of local government under the laws of the State of West Virginia. Wheeling is eligible to be a recipient of EPA Brownfield Cleanup funding.
2. **Previously Awarded Cleanup Grants:** The proposed site, located at 131 15th Street in Wheeling, WV has not previously been awarded an EPA Cleanup grant.
3. **Expenditure of Existing Multipurpose Grant Funds:** The City of Wheeling affirms that it does not have an open EPA Brownfields Multipurpose Grant.
4. **Site Ownership:** The City of Wheeling, WV is the sole owner of the proposed site seeking EPA Cleanup Grant funding. The site was conveyed to the City with a covenant for general warranty from Minority Aviation Education Association Inc. and has had a fee simple title since early 2022. The City of Wheeling intends to own this site for the duration of the time in which EPA Brownfield Cleanup Grant funds are disbursed for the cleanup of the site and, indeed, as a planned public center, Wheeling intends to maintain fee ownership of this site for the long term.
5. **Basic Site Information:**
 - a. **Site Name:** Clay School site
 - b. **Address:** 131 15th Street, Wheeling WV 26003
 - c. **Current Owner:** City of Wheeling, WV
6. **Status and History of Contamination at the Site:**
 - a. **Contaminants:** The site is contaminated by hazardous substances.
 - b. **Operational History and Current Use:** The Clay School structure (140,511 sq. ft.) was completed in 1943 to serve the students in the Ohio County Public School system. This hulking, 140,511 sq. ft. building features a four-story, eight-bay blond brick facade with a flat roof and brick/cement block foundation. The school is also one of the 300 contributing structures to the East Wheeling Historic District (NRS 99001402) and was constructed to feature 35 classrooms, a cafeteria, an auditorium, and a gymnasium to support the education of elementary and junior high school students. Following its closure in the 1990s, the School District left the site idle until eventually selling it in 2004 with the buyer's intention of transforming the structure into a science and community center. However, redevelopment never took place, and the site sits idle.

- c. **Environmental Concerns:** Based on a Phase I ESA and Hazardous Materials report conducted prior to the site's acquisition in 2022, Wheeling has determined that there are known hazardous substances found at the site including asbestos-containing materials (ACM), hazardous materials, mold, and possibly lead-based paint (LBP).
 - d. **How the site became contaminated:** These hazardous substances were used during building construction and renovation, and as a result of school functions including in the science lab.

- 7. **Brownfields Site Definition:** The Clay School is a "Brownfield" under CERCLA Section 101(39), as demonstrated by the approved use of U.S. EPA Brownfield Assessment for the Phase I ESA and Hazardous Materials Report. The Site is not listed or proposed for listing on the National Priorities List; is not subject to any unilateral administrative orders, consent orders, administrative orders on consent, or judicial consent decrees issued to or entered into parties under CERCLA or any other law, regulation or judicial process; and is not subject to the jurisdiction, custody or control of the U.S. government.

- 8. **Environmental Assessment Required for Cleanup Grant Applications:** In December 2021, the City of Wheeling worked with the Belomar Regional Council to have licensed environmental professionals conduct a Phase I environmental site assessment at the Clay School site compliant with ASTM 1527-13 standards that incorporates all assessment and evaluation activity to date, the review of historical information, reconnaissance to evaluate site conditions, and interviews with knowledgeable persons. In March 2022, a Hazardous Building Materials Survey was also completed. This included testing for ACM with bulk samples potential ACM materials were obtained, containerized, logged, and submitted to Eurofins CEI of North Carolina for asbestos content analysis. A total of 103 samples were collected, on which laboratory analysis revealed a total of 158 individual analyses were required due to multiple layered bulk samples being analyzed. In addition, this survey included Toxic Characteristic Leachate Procedure (TCLP) testing on representative architectural building components to evaluate if typical demolition waste would be considered hazardous waste based on lead content, a screen for the presence of dielectric fluid storage vessels (e.g., contact switches, ballast, etc.), electrical lighting fixtures, fluorescent light tubes (lamps), mercury, petroleum products, refrigerant gas, hydraulic fluids, and any other miscellaneous supplies that may contain hazardous materials that require proper removal and disposal, and a survey of the chemical products found onsite.

- 9. **Site Characterization:**
 - a. The City of Wheeling affirms that there is a sufficient level of site characterization from the environmental site assessment described above for the remediation work to begin on the site.
 - b. The site is not eligible to enter the voluntary response program as the site is contaminated with hazardous building material, which falls under a separate program at the WVDEP than the voluntary response program, and as demonstrated in the attached letter from the West Virginia Department of Environmental Protection.

- c. A qualified Environment Professional who meets the definition in 40 § CFR 312.10 has certified that there is a sufficient level of site characterization from the environmental site assessment performed to date for the proposed remediation work to begin.

10. Enforcement or Other Actions: There are no known ongoing or anticipated environmental enforcement or other actions related to the Clay School Site.

11. Sites Requiring a Property-Specific Determination: This Clay School site does not require a property-specific determination from U.S. EPA to be fundable with this Cleanup grant.

12. Threshold Criteria Related to CERCLA/Petroleum Liability: The Clay School Site is contaminated with hazardous substances.

Property Ownership Eligibility – Hazardous Substances – According to CERCLA Section 104(k)(3)(E), the City of Wheeling is eligible for U.S. EPA Brownfield Cleanup grant funding through the use of a bona fide prospective purchaser liability protection at the site acquired by the City after January 11, 2002. Specific detail:

- a. Information on Property Acquisition: The City acquired the site from the Minority Aviation Education Association on January 7, 2022 (Ohio County Deed Book 1014 – Page 391). Wheeling now has fee simple ownership and is the sole owner of the 0.661-acre parcel (Parcel ID 35-10-0W51-0627-0000). Wheeling affirms that there are no familial, contractual, corporate, or financial relationships or affiliations with the prior owners, operators, or other potentially responsible parties of the property.
- b. Pre-Purchase Inquiry: The city conducted all appropriate inquiries (AAI) prior to the site acquisition as demonstrated by a Phase I Environmental Site Assessment completed by QEP Environmental Standards Inc. in conformance with the scope and limitations of ASTM Standard E 1527-13 and consistent with the requirements of the All-Appropriate Inquiries Final Rule at 40 Code of Federal Regulations (CFR) Part 12. This Phase I ESA included a review of reasonably ascertainable regulatory databases and historical records, interviews with personnel who may have knowledge about environmental conditions at the Property, an assessment of user-provided information about the Property, a site reconnaissance, and a report of findings associated with the investigation. The overall objective of the Phase I ESA services was to identify potential environmental issues, both past and present, related to the Property that may create a potential environmental liability for the potential purchaser of the Property. This Phase I Environmental Site Assessment was conducted less than 180 days prior to the date the City of Wheeling acquired the property.
- c. Timing and/or Contribution Toward Hazardous Substances Disposal: The City of Wheeling affirms that it is not, in any way, liable for contamination at the site or affiliated with any other person potentially liable for the contamination. All disposal of hazardous

substances at the Clay School occurred before the City of Wheeling acquired the property on the January 7, 2022. The City of Wheeling affirms that it has not caused or contributed to any release of hazardous substances at the site at any time, nor since January 7, 2022. The City of Wheeling affirms that it has not, at any time before, on or since January 7, 2022, ever arranged for the disposal of hazardous substances at the site, or transported hazardous substances to the site.

- d. **Post-Acquisition Uses:** The site has remained idle and properly secured since the City acquired the property and has had no uses by persons or entities other than the City.
- e. **Continuing Obligations:** Since taking ownership of the site, the City of Wheeling has not conducted any activities at the site that would disturb or exacerbate the existing conditions.
- f. **Commitment Confirmation:** The City of Wheeling confirms its commitment to complying with any land use restrictions and not impeding the effectiveness or integration of any institutional controls; assisting and cooperating with those performing the cleanup and providing access to the property; complying with all information requests and administrative subpoenas that have or may be issued in connection with the property; and, providing all legally required notices.

13. Cleanup Authority and Oversight Structure:

- a. **Site Cleanup Oversight:** The City of Wheeling will put its significant, 25+ years of experience in brownfield revitalization including collaboration with U.S. EPA OBLR and the West Virginia Department of Environmental Protection's Division of Land Restoration, as well as specific oversight standards and protocols, into place to ensure effective implementation and oversight of the Clay School brownfield cleanup. These oversight standards and protocols will include:
 - i. **State Voluntary Cleanup Program:** The Clay School site is not eligible to participate in the West Virginia Department of Environmental Protection's (DEP) Voluntary Remediation Program (VRP), as asbestos and Lead-Based Paint remediation is conducted through WVDEP's NESHAP program, not via the VRP, as demonstrated in the attached letter. The City will consult with EPA and continue coordination with DEP to ensure the cleanup is protective of human health and the environment.
 - ii. **Environmental professionals:** The City of Wheeling already utilizes highly skilled environmental professionals to support brownfield assessment, remedial planning, reuse planning, and redevelopment efforts. These environmental professionals, and others competitively procured to support the City of Wheeling in the implementation of its EPA Cleanup program, will boost the City's capacity and expertise to conduct its brownfields work. The City expects to procure environmental professionals (known under the DEP VRP program as "Licensed Remediation Specialists") to oversee Clay School's remedial planning and cleanup under the DEP VRP to ensure effective cleanup. The professionals that Wheeling now uses for its technical brownfields expertise were competitively procured under the city and State of West

Virginia procurement requirements, with best-value competitive written bids and in-person interviews. To the extent that Wheeling seeks to obtain different or additional technical expertise for its Clay School brownfield cleanup, such firms will be procured competitively using similar processes that is compliant with 2 CFR Secs 200.317-200.326.

- b. **Adjacent or Neighboring Site Access:** Based on extensive assessment and remedial planning already conducted by the City of Wheeling with the support of environmental professionals, there is no expectation that a cleanup response at the Clay School site will impact adjacent properties or neighboring sites for any reason.

14. Community Notification: The greater Wheeling community was given the opportunity to comment from the dates beginning on October 24, 2023 and ending on November 7, 2023 with a Community Meeting held specifically to discuss the application on November 7, 2023.

- a. **Draft Analysis of Brownfields Cleanup Alternatives:** A draft ABCA was presented at the community meeting held on November 7, 2023.
- b. **Community Notification Ad:** The Community Notification Ad, which was published on October 24, 2023, in the local newspaper the Wheeling Intelligencer (which is two full weeks before the November 13, 2023 submission of this grant application to EPA, as well as two weeks before the Wheeling public meeting).
- c. **Public Meeting:** A public meeting to discuss the draft applicant and consider public comments prior to the submittal of this application was held at 5:30 pm on November 7, 2023. Two people attended this public meeting and the city did not receive any comments.
- d. **Submission of Community Notification Documents:** see attached supporting documents including the ABCA, a copy of the newspaper ad regarding public comment and a public meeting, the public meeting sign-up sheet, and a statement that no public comments were received and thus there are no responses from the City to such comments.

CITY OF WHEELING



OFFICE OF THE CITY MANAGER

CITY COUNTY BUILDING
1500 CHAPLINE STREET
WHEELING, WEST VIRGINIA 26003
304-234-3747

November 13, 2023

The Honorable Michael Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

David Lloyd
Director, Office of Brownfields and Land Revitalization
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Letter of Match Commitment for Clay School Site Brownfield Cleanup

Dear Mr. Regan and Mr. Lloyd,

On behalf of the City of Wheeling, I write to confirm our commitment to providing match resources for the "Clay School Site Cleanup" seeking Environmental Protection Agency (EPA) Brownfield Cleanup Grant funding.

The Clay School project will use \$500,000 in Brownfield Cleanup Grant funding leveraged by \$31,641 in local cash and in-kind match resources, to support the removal of asbestos-containing materials (ACM) and other accumulated hazardous wastes at the site to bring a blighted and polluted former public school back to productive use. The City of Wheeling is fully dedicated to executing this project and commits to providing the \$31,641 needed to complete the proposed scope of work.

I certify that the matching contribution stated in this letter of commitment is, to the best of my knowledge, correct. I acknowledge that the contribution is subject to review and acceptance by the Environmental Protection Agency. I also acknowledge that contributions claimed in the subsequent reports are subject to audit and verification by the appropriate agencies and authorities.

Thank you for your consideration of this important project. These funds will allow the city to revitalize this former community anchor to once again serve as a hub for the community, foster future investments, and help to create a more vibrant and safer environment for Wheeling families.

Sincerely,

A handwritten signature in blue ink, appearing to read "RH", with a long horizontal line extending to the right.

Robert Herron
City Manager, City of Wheeling