Narrative Information Sheet

1. **Applicant Information:** Pocahontas County Commission
   900 Tenth Avenue, Marlinton, WV 24954
   304/254-8115

2. **Funding Requested:**
   a. **Grant Type:** Single Site Cleanup
   b. **Federal Funds Requested:**
      i. $ 500,000
      ii. We are requesting a cost share waiver

3. **Location:**
   a. **City:** Frank
   b. **County:** Pocahontas
   c. **State:** West Virginia

4. **Property Information:** Former Howes Tannery
   165 East Park Road, Frank, WV 26264

5. **Contacts:**
   a. **Project Director:** Melissa Bennett, County Clerk
      304/799-4549
      pocaclk@clerk.state.wv.us
      900 Tenth Avenue, Marlinton, WV 24954
   b. **Chief Executive:** Walt Helmick, President
      304/799-7172
      pocaclk@clerk.state.wv.us
      900 Tenth Avenue, Marlinton, WV 24954

6. **Population:** Frank, population 89; Pocahontas County, population 8,247

7. **Other Factors Checklist:** Attached as following page/Discussed on pages 2&3 of Narrative

8. **Letter from State Environmental Authority:** Letter Attached

9. **Releasing Copies of Applications:** Not Applicable; no sections of the application are confidential, privileged, or sensitive information.
## Other Factors Checklist

<table>
<thead>
<tr>
<th>Former Howes Tannery, Frank, Pocahontas County, WV</th>
<th>Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>1, 3</td>
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<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td></td>
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<tr>
<td>The proposed brownfield site(s) is impacted by mine-scarred land.</td>
<td></td>
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<tr>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>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).</td>
<td>1</td>
</tr>
<tr>
<td>The proposed site(s) is in a federally designated flood plain.</td>
<td>2</td>
</tr>
<tr>
<td>The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td></td>
</tr>
<tr>
<td>The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.</td>
<td></td>
</tr>
<tr>
<td>The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.</td>
<td></td>
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</tbody>
</table>
November 15, 2021

Mr. Walt Helmick, Commission President
Pocahontas County Commission
900 Tenth Avenue
Marlinton, WV 24954

RE: State Environmental Authority Acknowledgement Letter
FY22 U.S. EPA Brownfields Cleanup Grant Application
EPA-OLEM-OBLR-21-06

Dear Mr. Helmick,

Thank you for your continued efforts to further enhance the state’s environment, economy, and quality of life by applying for a U.S. EPA Brownfields Cleanup Grant.

This grant will provide vital funding to ensure cleanup of the Former Howes Tannery site. Past site use included leather tanning, and the site has various contaminants, including asbestos in building materials, heavy metals, PCB compounds, volatile organic compounds, and semi-volatile organic compounds. By cleaning up the property, the Pocahontas County Commission can redevelop the site and expand the East Fork Industrial Park.

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 assisting you to clean up the Former Howes Tannery site into productive and positive new uses. Please do not hesitate to contact me with any questions or needs.

Sincerely,

Derek Hancock
West Virginia Brownfields Coordinator
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION
   a. Target Area and Brownfields
      i. Background and Description of Target Area
         The target area is in the rugged, rural Appalachian Mountains of Pocahontas County in eastern West Virginia (WV). Settled before the American Revolution, Pocahontas County is a wooded outdoor paradise that provides the headwaters for eight rivers. With the highest average elevation of any county in the eastern U.S., it offers visitors' year-round opportunities to experience the outdoors with world-class skiing and snowboarding, hiking, mountain biking, hunting, fishing, golf and more. Known as “Nature’s Mountain Playground”, tourism and outdoor recreation is the largest industry bringing more than $113 million in direct annual economic impact in 2019 and registering more than 1 million tourism visits per year. There are more than 350,000 acres of federal and state public lands for hunting and outdoor recreation, as well as steam engine rail tours, motorcycle and driving tours on scenic meandering mountain roads.
         Comprised of over 940 square miles with a population density of less than 8.4 people per square mile (U.S. Census, 2020), Pocahontas County is extremely rural. The County has a been part of extraction industries for centuries, including timber and coal mine support sectors. More than 80% of its land is classified as hardwood timberland, growing some of the world’s highest quality hardwoods. Timber harvesting and processing is the second largest industry in the County; the most recent numbers compiled by the WVU Appalachian Hardwood Center estimated hardwood sales at just under $100 million in 2017. Most hardwoods produced in the region have been transported out of the region, with a majority exported out of the country for final processing and finishing for the residential and business construction industries, and for high-end furniture manufacturing. Due to multiple factors, including international trade wars, global economic declines, and most recently COVID-19 related issues including transportation and workforce issues, hardwood production has plummeted, with companies in the U.S. losing an estimated $1.1 billion in 2020 (American Hardwood Export Council, 2020). Pocahontas County’s extensive timber production decreases coupled with additional losses in the tourism and hospitality sectors due to COVID-19 has further decreased the economic vitality of the County as these represent the top two economic drivers for the area.
      ii. Description of the Proposed Brownfield
         The specific site to be addressed is an approximately 11.6-acre section of the East Fork Industrial Park, located adjacent to the Greenbrier River at 165 Industrial Park Road, in the small unincorporated community of Frank, WV (population 98, U.S. Census, 2020). The site is the former location of a tannery owned by Howes Leather Company, which operated from the early 1900’s until the early 1990’s and was once the largest producer of shoe sole leather in the world. The tannery supplied companies such as Florsheim and Hanover Shoes and employed 130 people; during WWII, the tannery was the major supplier of U.S. military boot soles. The tannery was located here due to the thriving timber industry in the early 20th century and the abundance of tree bark species that were used in the leather tanning process, combined with an available and free water source (Greenbrier River). Environmental contaminants currently found on the
site include asbestos in building materials, and heavy metals including arsenic, vanadium, lead and manganese, polychlorinated biphenyls, and volatile and semi-volatile organic compounds including chlorobenzene, naphthalene, and methyl ethyl ketone, located in soils and groundwater in various sections of the site. An unnamed tributary of the Greenbrier River, located in the 500-year federal floodplain, dissects the site. The remaining area of the site is outside any federal floodplain designations.

The property is now owned by the Pocahontas County Commission ("the Commission") which purchased the property in 1995 as a first step toward redeveloping the property as a new industrial park. In 2002, a portion was transferred to the Greenbrier Valley Economic Development Corporation (GVEDC) to assist in the development and coordination of an expansion project for Inter-State Hardwoods, producer of high-quality hardwoods for the housing and commercial building industry that now employs more than 100 people. This expansion project provides a blueprint for how the Commission and the GVEDC can develop additional space at this location for new development or expansion projects, as more companies are returning to the U.S. for manufacturing products that utilize high-grade hardwoods. Remediation of the former Howes Tannery site is the top priority for the Commission and the County to capitalize on these industries returning to the U.S.

b. Revitalization of the Target Area
   i. Reuse Strategy and Alignment with Revitalization Plans
   The redevelopment of the Howes Tannery site aligns with the region’s current Comprehensive Economic Development Strategy. This plan includes strategically and effectively planning for the comprehensive development of the region, including priority areas of focus concerning economic development, community development, and resource development. One of the main goals in this Strategy is in direct alignment with this project, stated as: “Working toward a strong, diversified economy with a mixture of industrial, tourism and commercial goods and services”. Specifically, regarding plans to expand the value-added hardwood products manufacturing industry, Pocahontas County and the region are utilizing efforts and activities from a number of hardwood related initiatives and organizations. The county is a member of the Hardwood Alliance Zone, which consists of twelve counties in the heart of WV’s hardwood region that provides a competitive advantage to the hardwood industry business in relation to relocation, expansion, and development resources. Other resources include West Virginia University’s Appalachian Hardwood Center which provides industry market reports and insights, and research in support of value-added products as well as the WV Forest Products Center that supports new and existing businesses in reaching new markets and new technologies for value added timber products. All of these organizations are working to grow a thriving, diverse and sustainable forest products industry that provides good paying jobs throughout the region.
   ii. Outcomes and Benefits of Reuse Strategy
   Redevelopment of the former Howes Tannery site will stimulate new economic development in hardwood processing, finishing and related manufacturing. These activities will attract new business, provide a means for existing business expansion, and increase capital investments
directly into the area. These positive benefits will increase local property values, add quality employment to the local area, and increase tax revenues. In addition, current timber harvesting companies in the region will have new local outlets to sell their hardwood timber and byproducts, solidifying existing business operations in the immediate region.

c. **Strategy for Leveraging Resources**
   
i. **Resources Needed for Site Reuse**
   
The Commission, as a recognized entity of the State of WV, is eligible for all major categories of federal, state, and private funding sources. In many cases, however, these funding sources don’t include funding specifically for conducting environmental remediation, which is critically needed on the former Howes Tannery site. Full remediation of a site is often required before other funds can be acquired for site redevelopment.

Funding sources available to augment this project, after site remediation completion, are available from various entities. One significant federal example available specifically to the region is the Appalachian Regional Commission, which has Pocahontas County listed as an “at-risk” county for economic distress. The Commission has successfully utilized funding from this federal source on past and current projects. A major State partner that The Commission has utilized in the past and will be supporting this project is the WV Economic Development Authority. This entity has provided funding previously for construction of the first shell building at the East Fork Industrial Park (now housing Inter-State Hardwoods) and is expected to contribute funds for redevelopment aspects of this project. A notable private foundation available to the Commission is the Claude Worthington Benedum Foundation, a private foundation supporting local community-based projects throughout WV for over 75 years. This Foundation provides funding for multiple uses, including economic development planning and local community development projects, of which this project will qualify.

iii. **Use of Existing Infrastructure**

Existing water and electric services at this site are of suitable size and capacity to support planned site redevelopment. A new sewer line is currently under construction, also of sufficient size and capacity to fully support future site plans. Site access roads are also in-place to support expansion plans. In September of 2021, the Commission was awarded a $2.5 million grant from the Appalachian Regional Commission, plus over $1 million in private funding, to expand fiber optic broadband internet service throughout the area. No additional infrastructure will be required for this project to be successful.

2. **COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

a. **Community Need**

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

Pocahontas County has lost 1/3 of its population since the mid-1900’s, currently at 8,247 (U.S. Census, 2020 estimate). Multiple factors have contributed to this population reduction, including the total shutdown of the coal mining industry, severely decreased timber exports, and reduced railroad operations associated with these coal and timber industry decreases. Data
from the American Hardwood Export Council indicate hardwood exports dropped by over 60% in 2019, with additional reductions in 2020 and continuing into 2021. This combination of economic declines has resulted in a 5-year poverty rate of 16.6%, similar to the State’s rate of 17.6% and well above the national rate of 13.4% (U.S. Census, 2020 est.). While the unemployment rate is similar to State and Federal rates, household income is severely reduced at only $41,882, 5% below the State average, and 33% below the national average (U.S. Census Quick Facts, 2020). The population decline combined with lower paying jobs has resulted in lower taxes available for County-based services; exacerbated by more than 62% of the county being owned by the State and federal government, further reducing property taxes that are meant to be funneled into services. Finally, WV does not currently offer a state-based grant program for environmental remediation of brownfield sites. Pocahontas County is not in a current financial position to draw on other sources of funding specifically for remediation of the former Howes Tannery site.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

Pocahontas County’s most vulnerable sensitive population is the elderly. With a median age 11 years older than the national age (49.1 compared to 38.1), Pocahontas County has nearly 33% of its population above the age of 60, a 1/3 higher rate than the national average of 22% (statistics from U.S. Census, 2020 estimates). The elderly population has unique health issues, including health concerns that can be directly connected to exposure to environmental contaminants like those found at the former Howes Tannery site. According to the National Center for Biotechnology Information (www.ncbi.nlm.nih.gov), elderly population segments “have unique challenges and different medical needs than younger adults”, including “reduced ability of the body to respond to environmental chemicals”. The Agency for Toxic Substances and Disease Registry (atsdr.cdc.gov) support this statement, stating elderly populations are “prone to having immune systems that are often weaker, and tend to have more sensitive lungs, resulting in more difficulty fighting off health effects from exposure to contaminants”. Another problem facing the elderly population in Pocahontas County is the lack of quality health-care facilities. According to the U.S. Health Resources & Services Administration (hrsa.gov), the county’s elderly population, combined with its low-income levels and limited primary care providers, are primary factors designating Pocahontas County as a “Medically Underserved Area”.

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

The former Howes Tannery site has multiple contaminants documented as being present from environmental investigations. Many are known to be cancer causing, including Asbestos (lung cancer), heavy metals including arsenic (lung and skin cancer), and various volatile organic compounds (cause of various cancers) (data from “Environmental Contaminants Often Found at Brownfield Sites”, EPA Brownfields Program, May 2020). WV has the second highest age-adjusted lung cancer rate in the U.S., 50.8 per 100,000, compared to the national average of 34.8 (Nat. Center for Health Statistics, Nat. Vital Statistics System). The State also has the highest
rate for new lung cancer cases, recorded at 80.1 per 100,000, compared to the U.S. rate of 58.7 (American Lung Association). Pocahontas County has notable high cancer rates as well. The county has a malignant neoplasms (cancerous tumors) rate of 220.8 per 100,000, similar to the State rate of 261.3 and 16% higher than the national rate of 185.4. The previously documented older population in the County is the highest population segment with these cancer rates (WV Vital Statistics, WV Dept. of Health & Human Resources, 2020).

(3) Promoting Environmental Justice

Based on information obtained using the EPA’s Environmental Justice Screening and Mapping Tool (EJSCREEN), the location of the subject site was evaluated and found to be located within an area of two significant environmental justice indicators that can be directly associated with this project: “Low Income Population” and “Population Over 64 Years of Age”. A low income value of 54% is in the 80th percentile of WV, and in the 83rd percentile nationally. The “low income population” data coincides with the previously documented low household income rates for the area. The “population over 64 years of age” value of 23% is in the 78th percentile of WV, and in the 85th percentile on a national level. Remediation of the former Howes Tannery site will affect both environmental justice indicators in a positive manner. First, remediation will lead to new business and existing business expansion in the area, as previously discussed, resulting in increased employment and associated income, improving the current low income indicator status. Second, remediation of contaminants will reduce potential exposure of environmental contaminants to area residents, previously documented as having a significant older population segment. Environmental justice will be promoted as this project transpires.

b. Community Engagement

i. Project Involvement and ii. Project Roles

While the unincorporated community of Frank (population 98, U.S. Census, 2020) has few traditional community groups, there are employers, agencies and neighboring towns that are willing to help with community involvement. The only employer in the community (Inter-State Hardwoods, Inc.) employs workers from the local area, and will serve as a local community partner. The adjacent Town of Durbin (population 255, U.S. Census, 2020) will also act as a local community partner. The Pocahontas Convention & Visitors Bureau (CVB) will also act as a community partner for information collection and dissemination. In addition, State and other organizations providing direct input and involvement to the project have been secured. Contact information and project roles are provided in the following table:

<table>
<thead>
<tr>
<th>Project Partner</th>
<th>Contact Information</th>
<th>Project Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Town of Durbin</td>
<td>Shereen Bailey, Mayor 304/456-4955</td>
<td>Community interaction assistance, site reuse input</td>
</tr>
<tr>
<td>Pocahontas County CVB</td>
<td>Cara Rose, Director 304/799-4636</td>
<td>Community interaction assistance, site reuse input</td>
</tr>
<tr>
<td>Inter-State Hardwoods Co., Inc.</td>
<td>Allen Sisler 304/456-4597</td>
<td>Site reuse input, local community interaction, local meeting space</td>
</tr>
<tr>
<td>Greenbrier Valley Economic Development Corporation</td>
<td>Ruthana Beazley, Director 304/497-4300</td>
<td>Project management assistance, site reuse input</td>
</tr>
</tbody>
</table>
iii. **Incorporating Community Input**

The Commission will use its regularly scheduled bi-monthly meeting as a primary method for obtaining community input and dissemination of project information. Meetings are scheduled monthly on a morning and evening basis, allowing increased opportunity for public participation, and always adhere to current Covid-19 meeting restrictions and social distancing guidelines, if applicable. Meetings are always open to the public, with question-and-answer and public comment sessions. Meetings are also accessible via a virtual platform for those that can’t attend in-person. All questions and comments pertaining to this project will be recorded, with answers provided in a timely manner, normally responding by the next meeting date. This project will be an on-going bi-monthly meeting agenda item throughout the duration of the project. A Project Summary Information Sheet has been developed and will be updated throughout the duration of the project on an “as-needed” basis to keep the community up to date on project advancements. All written correspondence will be in English, as 100% of the local area uses English as a primary language.

As site redevelopment planning activities get underway, outdoor meetings will be held, in addition to regular Commission meetings, at a specified environmentally safe location on-site. In the event inclement weather occurs, indoor space provided by Inter-State Hardwoods, located adjacent to the site, will be utilized, adhering to current COVID-19 meeting restrictions and social distancing guidelines (if applicable).

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

a. **Proposed Cleanup Plan**

The Former Howes Tannery site has various contaminants on the site, originating from past use as a leather tanning facility. Contaminants include asbestos in building materials, heavy metals including arsenic, vanadium, lead and manganese, polychlorinated biphenyls, and volatile and semi-volatile organic compounds including chlorobenzene, naphthalene, and methyl ethyl ketone, located in soils and groundwater in various sections of the site. Several contaminants exceed WV De Minimis standards for industrial use. Complete removal of all contaminants is not feasible, due to elevated removal costs, as detailed in the Analysis of Brownfields Cleanup Alternatives (ABCA, submitted with application). A combination of removal and capping of contaminated soils at select locations, removal of asbestos building materials, and a risk-based assessment on remaining contaminants will be conducted. The site will be entered in the WV Voluntary Remediation Program (VRP) under the direction of a WV Licensed Remediation Specialist (LRS) to guarantee safe site reuse while remaining residual contaminants are properly managed. Groundwater monitoring and modeling will be performed to meet VRP requirements. Cleanup activities will begin immediately after receiving requested grant funds, with a project timeframe of 36 months.
### b. Description of Tasks / Activities and Outputs

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

<table>
<thead>
<tr>
<th>Task 1: Project Management and Enter Site into VRP</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>i. Project Implementation:</strong> Project management and oversight, cooperative agreement completion, and all required quarterly and financial reporting will be under the direction of the Commission. An experienced WV Licensed Remediation Specialist (LRS) will be hired through a competitive bid process to enter the site into the WV VRP. Initial VRP activities include a Pre-Application and Kick-Off meeting with the WVDEP, VRP application submittal with required public notices (and application fee), Work Plan, ABCA finalized and associated WVDEP costs for project review and supervision. A Commission representative will travel, as allowed per COVID-19 restrictions (if applicable), to participate in 2 WV Brownfields Conferences and 1 national EPA Brownfields Conference. Quarterly public meetings will be held throughout the 3-year project timeframe.</td>
</tr>
<tr>
<td><strong>ii. Anticipated Project Schedule:</strong> Month 1 through Month 36</td>
</tr>
<tr>
<td><strong>iii. Task Lead:</strong> Commission representative will oversee project management; LRS will oversee VRP activities</td>
</tr>
<tr>
<td><strong>iv. Outputs:</strong> 12 quarterly project reports, 12 quarterly financial status reports, participation in 3 brownfield conferences, 1 VRP application, 12 public meetings, ABCA finalized, 1 Workplan</td>
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<table>
<thead>
<tr>
<th>Task 2: Site and Risk Environmental Assessments</th>
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<tbody>
<tr>
<td><strong>i. Project Implementation:</strong> The LRS will oversee completion of a VRP Site Assessment Report and Human Health &amp; Ecological Risk Assessment that meets VRP requirements.</td>
</tr>
<tr>
<td><strong>ii. Anticipated Project Schedule:</strong> Month 3 through Month 24</td>
</tr>
<tr>
<td><strong>iii. Task Lead:</strong> LRS</td>
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<tr>
<td><strong>iv. Outputs:</strong> 1 VRP Site Assessment, 1 Risk Assessment</td>
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<thead>
<tr>
<th>Task 3: Asbestos Abatement</th>
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<tbody>
<tr>
<td><strong>i. Project Implementation:</strong> The Commission hire, through a competitive bid process, a WV Certified Asbestos Abatement contractor, for removal of all asbestos containing materials in the on-site buildings. Required notices to the WVDEP, Division of Air Quality, will be submitted prior to scheduling of asbestos abatement removal activities. A report documenting asbestos abatement will be compiled.</td>
</tr>
<tr>
<td><strong>ii. Anticipated Project Schedule:</strong> Month 6 through Month 12</td>
</tr>
<tr>
<td><strong>iii. Task Leads:</strong> xxx</td>
</tr>
<tr>
<td><strong>iv. Outputs:</strong> 1 Asbestos Abatement Report</td>
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<table>
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<tr>
<th>Task 4: Groundwater Monitoring</th>
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</thead>
<tbody>
<tr>
<td><strong>i. Project Implementation:</strong> The LRS will oversee installation of groundwater monitoring wells, performance of 8 rounds of groundwater sampling and associated monitoring, groundwater modeling and reporting.</td>
</tr>
<tr>
<td><strong>ii. Anticipated Project Schedule:</strong> Month 6 through Month 30</td>
</tr>
<tr>
<td><strong>iii. Task Lead:</strong> LRS</td>
</tr>
<tr>
<td><strong>iv. Outputs:</strong> Installation of groundwater monitoring wells, Groundwater Monitoring and Modeling Report</td>
</tr>
</tbody>
</table>
**Task 5: VRP Completion**

**i. Project Implementation:** The LRS will Submit for approval all VRP reports and required documents for Certificate of Completion, occurring during the final six months of the project.

**ii. Anticipated Project Schedule:** Month 30 through Month 36

**iii. Task Lead:** LRS

**iv. Outputs:** Land Use Covenant and/or Engineering and Institutional Controls document, Remedial Action Completion Report, Final VRP Report, VRP Certificate of Completion, Remediation of 11.6 acres of brownfield property

**c. Cost Estimates**

Cost estimates for each task is provided in the following table:

<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Project Tasks ($)</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Project Management/Enter VRP</td>
<td>Site and Risk Assessment</td>
</tr>
<tr>
<td>Personnel</td>
<td>22,000</td>
<td></td>
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<tr>
<td>Fringe Benefits</td>
<td></td>
<td></td>
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<tr>
<td>Travel¹</td>
<td>3,000</td>
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</tr>
<tr>
<td>Equipment</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supplies</td>
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<td></td>
</tr>
<tr>
<td>Contractual</td>
<td>10,600</td>
<td>130,300</td>
</tr>
<tr>
<td>Other²</td>
<td>8,600</td>
<td>18,200</td>
</tr>
<tr>
<td>Total Direct Costs</td>
<td>44,200</td>
<td>148,500</td>
</tr>
<tr>
<td>Indirect Costs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Federal Funding</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cost Share³</td>
<td>8,840</td>
<td>29,700</td>
</tr>
<tr>
<td>Total Budget</td>
<td>53,040</td>
<td>178,200</td>
</tr>
</tbody>
</table>

¹ travel to three brownfields events; ² Other costs include WVDEP VRP costs; ³ A Cost Share Waiver is Being Requested

Note: Remediation costs were compiled using Environmental Assessment results, and utilizing input from the WVDEP’s Brownfields Program and environmental professionals.

Budget Details for each Project Task are as follows:

**Task 1 - Project Management and Enter Site in VRP**

**Personnel Cost:** Project Manager, 16 hours (2 days)/month, 36 months, 576 hrs. at $38.20/hr.; Total $22,000 (note: total rounded down)

**Travel:** 1 person attending two WV Brownfields Conferences, $750 per event; 1 person attending one national EPA Brownfields Conference, $1,500; Total $3,000
Contractual: LRS participating in 12 quarterly project update meetings, estimated at $300 / meeting; $3,600; required WVDEP VRP meetings (2 at $750 per meeting); $1,500, LRS updating ABCA, compiling VRP application and Work Plan; $5,500; Total $10,600

Other: WVDEP costs for VRP application fee, required meetings, public notice; $8,600

**Task 2 – Site and Risk Assessment Activities**

Contractual: VRP Site Assessment and Human Health & Ecological Risk Assessment, $130,300

Other: WVDEP costs for VRP report reviews and associated project interactions, $18,200

**Task 3 – Asbestos Abatement**

Contractual: Estimated cost for removal and disposal of all identified asbestos materials, $61,500

**Task 4 – Groundwater Monitoring**

Contractual: Groundwater Monitoring Well Installations, 8 rounds of groundwater sampling to meet VRP requirements, groundwater modeling, $65,000

**Task 5 – VRP Completion**

Contractual: Submittal of all required VRP reports, including Remedial Action Completion Report and Final VRP Report, $174,800

Other: WVDEP fees for final VRP report approval and associated documentation, $6,000

The Commission is requesting a cost share waiver. In the event this request is not approved, the Commission will provide cost share, including cash and in-kind contributions from project support partners. At this time, it is anticipated that in-kind cost share contributions would be provided by the Commission and its project management partners, and the WVDEP and WV Brownfields Assistance Center, providing labor for technical assistance and interaction with the LRS and the Commission.

**d. Measuring Environmental Results**

Project outputs will be tracked and measured using the “Project Summary Information Sheet”, updated as needed throughout the 3-year project timeframe. The LRS will participate on a quarterly basis as part of the Commission’s regularly scheduled bi-monthly meetings, ensuring project results are progressing in a timely manner. Using the bi-monthly Commission meetings including quarterly LRS participation throughout the 3-year project period will ensure the project is meeting project outputs and overall project goals. Two projected Project Outcomes include 11.6 acres of brownfield property remediated and ready for reuse, and removal of potential exposure of the local community and future site users to hazardous levels of contaminants including asbestos, various heavy metals and multiple volatile and semi-volatile organic petroleum hydrocarbons. Future outcomes after conclusion of this project will include up to 30 new jobs created, and additional funding leveraged (amount yet to be determined; estimated at $2.5 to $3.5 million) for site reuse development.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Programmatic Capability**

i. Organizational Structure / ii. Description of Key Staff

The Commission is a subdivision of WV State government and, per legislative code, is “the county court or tribunal in lieu thereof” (WV Code 7-1-1). The Commission must consist of three elected
Commissioners with supporting personnel, with a primary function of supervising the county’s financial affairs. Mr. Walt Helmich is Commission President and Chief Executive contact for this project. Melissa Bennett serves as County Clerk and will be the Project Director for this project. The Commission will also be utilizing management services of the Greenbrier Valley Economic Development Corporation, listed previously as a project partner, to assist with grant management. This organization has vast experience in grant management of federal, state and private funding sources, managing more than $1.7 million in the past 2 years. Their project support and day-to-day involvement will ensure that reporting and grant management meets EPA requirements, and allow redevelopment plans to parallel cleanup efforts.

iii. Acquiring Additional Resources

The Commission will use a competitive procurement process, adhering to the procedures detailed in 2 CFR Part 200 and EPA Rule 2 CFR Part 1500 on “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards”, to hire a WV LRS, required for all sites entering the WV VRP. The selected LRS will be experienced in EPA Brownfields Assessment grant projects and will assist the Commission in implementing this brownfields cleanup project. In the event additional resources are identified that are required to complete this project, the Commission will follow the same procedure, using a competitive procurement process to hire the appropriately experienced consultant or contractor.

b. Past Performance and Accomplishments

ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

(1) Purpose and Accomplishments

The Commission has not received any EPA Brownfields grants but has received multiple federal and non-federal assistance agreements for decades. Numerous grants have been received in just the past two years. Three recent examples (FY 2020, 2021) are provided on the following table:

<table>
<thead>
<tr>
<th>Project</th>
<th>Amount</th>
<th>Project Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing and Urban Development/ARC Community Dev. Broadband Study</td>
<td>$2,575,000</td>
<td>Community broadband study and implementation</td>
</tr>
<tr>
<td>WV Justice Department - Community Corrections Grant</td>
<td>$51,000</td>
<td>Alternate sentencing opposed to serving jail sentences for low-risk offenders</td>
</tr>
</tbody>
</table>

(2) Compliance with Grant Requirements

The Commission successfully managed and performed all requirements of the example grants provided in the previous table, as well as all grants received in the past several years. Projects were completed according to work plans and schedules, achieving expected results. Reports were filed in a timely manner and no compliance issues were encountered.
Threshold Criteria For Cleanup Grants

1. Applicant Eligibility – The Pocahontas County Commission is recognized by the State of West Virginia as the official governing body for Pocahontas County and is eligible for federal funding.

2. Previously Awarded Cleanup Grants – The Pocahontas County Commission affirms that the site has not previously received any EPA Brownfields Cleanup grants.

3. Expenditure of Existing Multipurpose Grant Funds – The Pocahontas County Commission affirms that it does not have an open EPA Brownfields Multipurpose grant.

4. Site Ownership – The Pocahontas County Commission purchased the property on July 15th of 1995. The deed for this property transaction was recorded on July 17, 1995.

5. Basic Site Information:
   Site Name:   Former Howes Tannery
   Site Address: 165 East Park Road, Frank, WV  26264

6. Status and History of Contamination at the Site - The site is the former location of a tannery owned by Howes Leather Company, which operated from the early 1900’s until the early 1990’s and was once the largest producer of shoe sole leather in the world. The tannery supplied companies such as Florsheim and Hanover Shoes and employed 130 people; during WWII, the tannery was the major supplier of U.S. military boot soles. The tannery was located here due to the thriving timber industry in the early 20th century and the abundance of tree bark species that were used in the leather tanning process, combined with an available and free water source (Greenbrier River). Environmental contaminants currently found on the site include asbestos in building materials, and heavy metals including arsenic, vanadium, lead and manganese, polychlorinated biphenyls, and volatile and semi-volatile organic compounds including chlorobenzene, naphthalene, and methyl ethyl ketone, located in soils and groundwater in various sections of the site.

7. Brownfield Site Definition – The Pocahontas County Commission affirms that “the site is not listed or proposed for listing on the National Priorities List, is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA, and is not subject to the jurisdiction, custody, or control of the U.S. government”.

8. Environmental Assessment – A Phase II Environmental Assessment was completed and submitted on November 17, 2021 by Tetra Tech, Inc.

9. Enforcement or Other Actions – There are no known ongoing or anticipated environmental enforcement or other actions related to the site.
10. Sites Requiring a Property-Specific Determination – The Pocahontas County Commission affirms that “the site does not need a Property-Specific Determination”.

11. Threshold Criteria Related to CERCLA /Petroleum Liability; Hazardous Substance Sites – The Pocahontas County Commission purchased the property on July 15th of 1995, after closure of the Howes Tannery facility. The deed was recorded on July 17th, 1995. The Commission purchased the property for the specific purpose of creating a new industrial park. Any disposal of hazardous substances occurred at the site before the Commission purchased the property. The Pocahontas County Commission confirms that we have not caused or contributed to any release of hazardous substances at the site, nor have we ever arranged at any time for disposal of hazardous substances at the site, or transported hazardous substances to the site. The section of the property identified for cleanup grant funding is vacant and is not in use. There are no known on-going hazardous releases of contaminants, nor no known exposure risks to site contaminants.

12. Cleanup Authority and Oversight Structure – The Pocahontas County Commission intends to enroll the site into the West Virginia Department of Environmental Protection’s Voluntary Remediation Program and has interacted with this agency in preparation of this cleanup grant application. All site remediation activities will be occurring on-site and will not affect any adjacent or neighboring properties.

13. Community Notification – A public notice was placed in the local newspaper (The Pocahontas Times) on October 28, 2021. A copy of the ad is provided with this application and included required information on plans to submit an EPA Brownfields Cleanup grant. A Draft Analysis of Brownfield Cleanup Alternatives was made available (included with this application submittal). A public meeting to discuss this application was held on November 16th, as part of the Pocahontas Commission’s regular monthly meeting, and was included as an agenda item for official discussion. A sign-in sheet was provided at this meeting for all persons attending (publicly and via virtual meeting platform). No comments or questions were received from the public.

14. Statutory Cost Share – The Pocahontas County Commission is applying for a “Hardship Waiver” for the required 20% cost share. A “Hardship Waiver Request” has been submitted as a separate document with this application.

15. Waiver of the $500,000 Limit – The Pocahontas County Commission is not requesting a waiver to exceed the $500,000 maximum funding request.

16. Named Contractors and Subrecipients – The Pocahontas County Commission has not contracted for environmental services for this project, nor arranged for any subrecipients for this grant request. Upon grant award, the Pocahontas County Commission plans to enter into a contract with the Greenbrier Valley Economic Development Corporation to utilize their expertise in grant management assistance. For environmental services, the Commission will use its competitive bid process to hire experienced environmental contractors for this project.