1. Applicant Identification: Economic Development Authority of Smyth County  
   121 Bagley Circle, Suite 100  
   Marion, Virginia 24354

2. Funding Requested:  
   a. Single Site Cleanup  
   b. Federal Funds Requested:  
      i. $250,000  
      ii. EDA of Smyth County is requesting a cost share waiver (Attached).  
      iii. EDA of Smyth County is not requesting a waiver of the $500,000 grant limit

3. Location:  
   a. Town of Saltville  
   b. Smyth County  
   c. Commonwealth of Virginia

4. Property Information: Former Town Shop  
   302 Lake Drive  
   Saltville, Virginia 24370

5. Contacts:  
   Project Director: Kendra Hayden  
   Economic Development Specialist: John McLean  
   121 Bagley Circle, Suite 100  
   Marion, VA 24354  
   (276) 706-8304  
   khayden@smythcounty.org

   Chief Executive: John McLean  
   Chairperson:  
   121 Bagley Circle, Suite 100  
   Marion, VA 24354  
   (276) 783-3298  
   jmcleanjr@mac.com

6. Population:  
   Town of Saltville Population: 1,824  
   (U.S. Census Bureau, 2020 Decennial Census)
7. Other Factors Checklist:

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
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</thead>
<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>4</td>
</tr>
<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/redevelopment; 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 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>2</td>
</tr>
<tr>
<td>The proposed site(s) is in a federally designated floodplain.</td>
<td>3</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>
</tr>
</tbody>
</table>

8. Letter from the State: Attached

9. Releasing Copies of Applications: N/A – This application does not have confidential, privileged, or sensitive information.
Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
1111 E. Main Street, Suite 1400, Richmond, Virginia 23219
P.O. Box 1105, Richmond, Virginia 23218
(800) 592-5482 FAX (804) 698-4178
www.deq.virginia.gov

November 9, 2021

Kendra Hayden
Smyth County Economic Development
121 Bagley Circle, Suite 100
Marion, Virginia 24354

VIA ELECTRONIC MAIL

Subject: Acknowledgement and Support
USEPA’s Community Wide Brownfields Assessment Grant
EPA-OLEM-OBLR-21-06
Smyth County Economic Development

Dear Ms. Hayden:

The Virginia Department of Environmental Quality (DEQ) is in receipt of your request for support to the above referenced Brownfields Grant application. The request will be for an EPA Brownfields Cleanup grant for the former Town Shop property for the Smyth County Economic Development Authority (EDA). DEQ has already begun partnering with you to advance brownfields redevelopment across the community and is thrilled to add our support for the subject EPA grant proposal.

It is our understanding that the site has a long history of use by the Olin Corporation and then the Town of Saltville. Using funding from an EPA Brownfields Assessment Grant, the Community Design Assistance Center at Virginia Tech assisted the community with completing environmental assessments on the site and creating a community-inspired plan to redevelop the site into a needed campground within Town. We partnered with Virginia Tech and the Town and provided funds from our Virginia Brownfields Assistance Fund to complete the environmental assessments and develop a cleanup plan for the site. This EPA Brownfields Cleanup project will continue to build upon the EPA and DEQ’s previous investments and support the Smyth County EDA with achieving the community’s vision of redeveloping the site.

The DEQ Brownfields Program is pleased to provide our support for this grant proposal and feels that if successful, the grant funds will play a vital role in continuing the revitalization and
redevelopment efforts for the community. It is our sincere hope that your EPA proposal will be successful, and Smyth County will be able to leverage this critical funding to stimulate economic development and revitalization within the County which has been hit hard with a changing economy over the last several decades. If I can be of further assistance, please don’t hesitate to call me at (804) 698-4064.

Sincerely,

Vincent A. Maiden, CPG
Brownfields Program Coordinator

cc: Stacy Bowers, Shon Pritchard – DEQ-SWRO
Meade Anderson – DEQ - CO
Joe Morici – Cardno
1. **PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

a. **Target Area and Brownfields**

i. **Background and Description of Target Area**

   The Economic Development Authority (EDA) of Smyth County is the primary organization responsible for industrial development within Smyth County and the owner of the subject Brownfield Site. The site is located in the Town of Saltville, which bridges both Smyth and Washington counties in southwest Virginia. The Town has an estimated population of 1,824 people and includes a total area of about 7.9 square miles.\(^1\) Saltville’s motto boasts “Preserving History for over 30,000 years”. The town’s location has an ecological significance that goes back millions of years when the town’s location was a shallow inland salt-water sea. The salt eventually was deposited in the Saltville Valley and formed veins of salt that run through the rock and form large salt caverns, becoming a key natural resource that has shaped Saltville’s history.

   In 1795, William King, an Irish immigrant traveled to Saltville Valley, purchased 150 acres, and began to seek his fortune manufacturing salt. The first salt mine in the United States was created by him in 1799 on a site near the subject property. When his initial effort failed due to water seeping into the mine, King resorted to the evaporation of salt water in a series of large kettles. His success with this method led to Saltville becoming a major producer of salt.

   In 1894, Mathieson Alkali Works began establishing chemical factories in Saltville to utilize the natural salt reserves, essentially beginning the modern chemical industry in the United States. 1898-1920 began a period of “boom” for company town growth in Saltville with the construction of houses, churches, a theater, the company store, a clinic, schools, and a golf course. Saltville also became a hub of industrial manufacturing boasting the largest dry ice plant in 1932 and second largest chlorine plant in the world in 1952. However, this boom time also came with an environmental and human cost. On December 24, 1924, a “Muck Dam” collapsed, sending a huge volume of liquid chemical waste stored by the Mathieson Alkali Company into the north fork of the Holston River and taking the lives of 19 people who lived along the river. The tragedy is one of the worst environmental legacies of the company. Throughout the 1960s, Olin Mathieson (as it was then known) began implementing environmental procedures, due to increasing public awareness of the effects of industrial pollution. Industrial site investigations in the 1970s identified high mercury levels in site soil, groundwater, and sediments of the North Fork of the Holston River as far as 80 miles downstream. In 1972, Olin announced the closure of the plant in Saltville. The loss of over 1,000 jobs in Saltville (with a population of just over 2,500 in 1970) left the town devastated.

   EPA placed the Olin industrial site on the Superfund program’s National Priorities List (NPL) in 1983. The Saltville Waste Disposal Ponds Superfund site is located along the North Fork of the Holston River encompassing 125 acres and includes two large former waste disposal ponds, containing both mercury and alkaline waste material, as well as the former location of a chlorine manufacturing plant. Initial cleanup included dredging mercury-contaminated sediments from the river, diverting clean surface water around the disposal ponds, and installing and operating a water treatment system. In 2003, a RCRA (Resource Conservation and Recovery Act) cap was installed over one disposal pond and a soil cover over the other with planted grasses, shrubs, and trees to support a wildlife habitat area. Cleanup actions completed to date have addressed the health risks of incidental ingestion or direct contact with waste materials. Despite Olin investing over 40 million on remediation efforts to date, the lingering ecological impact is evidenced by the continuation of a 1970’s ban on consumption of fish caught from an 80 mile stretch of the North 

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\(^1\) US Census Bureau, 2020 Decennial Census
Fork of the Holston River from Saltville down to Tennessee due to high levels of mercury in fish tissue. The EPA efforts have helped address the largest sites with significant impacts, but the community still deals with the environmental legacy of several smaller remnants of the Olin Company throughout the Town. Being small in terms of both geography and population, the Town is our Target Area.

ii. Description of the Brownfield Site

From about 1940 until about 1969, Olin-Mathieson used an approximately 56-acre site on Lake Drive. The subject property included a pump house to supply water to the production wells located on site, and a maintenance shop building. Historically, extensive solution salt mining has occurred on the site, involving the injection of water and extraction of salt brine from onsite wells. Some of the oldest salt brine wells in Saltville were located at the town shop site. At the time, saline water was extracted from the wells and boiled in furnaces housed in open sheds. About 75 shallow [200-400 feet below ground surface (bgs)], low pressure, salt brine wells were located on adjacent parcel to the north, and operated until circa 1930. The valley has been subjected to large-scale subsidence as a result of shallow salt brine extraction. A tributary to the North Fork of the Holston River runs along the northern portion of the property. Deep (2,000-4,000 feet bgs), high pressure, solution salt mining began circa 1930 from onsite salt wells located at higher elevations and continues to this day. A large collapse occurred at three (3) salt wells on the southwest property corner in 1960. Salt caverns began to be used for natural gas storage circa 2000. After the plant closure, Olin donated company property within the Town limits, including the subject property, to the Town of Saltville. Now responsible for much of the infrastructure once maintained by Olin, the Town used the subject property as the Town Shop. The site included a maintenance office with a locker/washroom and storage building. Town vehicles and equipment were parked in the garage area of the Town Shop Building, and the Town only performed light maintenance (oil and tire changes) at the site. From about 1970-1980, Virginia Insulated Products Company used the large bay area on the north side of the building to apply glass-film insulation copper wire for use in electrical motor armatures. After 1980, the Town has used the large bay to store salt used to treat roadways during the winter. Currently, Saltville Gas Storage Company, LLC, uses onsite salt caverns for natural gas storage on the adjacent parcel.

Over the decades of use from Olin and then the Town, particularly at times before environmental regulations, low-lying areas of the large acreage were used as dump sites. Landfill areas were identified with materials buried just below the surface, and miscellaneous debris is scattered over the site. With funding from an EPA Brownfields Assessment Grant awarded to the Community Design Assistance Center (CDAC) at Virginia Tech and a grant from the Virginia Brownfields Assistance Fund (VBAF), a Phase II Environmental Site Assessment identified impacts from polycyclic aromatic hydrocarbons (PAHs) in site soils and a petroleum impact at one sampling location. Soils in area formerly used as a gun range are impacted by lead contamination. An Asbestos-containing Materials (ACM) survey identified asbestos in tan floor tile and window caulking in the shop building and the roofing material on the pump house building. As the shop building has been condemned due to structural issues, the Town relocated its maintenance operations to a new site. The Economic Development Authority (EDA) of Smyth County has acquired the site in order to facilitate its cleanup and reuse.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

Over the past several years, the EDA and the Town of Saltville have continued to focus on revitalizing and diversifying the community’s economic framework following the closure of Olin
Chemical Corporation. In 2017, the Town engaged CDAC to help develop a master connectivity plan for the Town and a redevelopment concept plan for the subject property. Over the course of six months, the CDAC team engaged community stakeholders to define the needs and opportunities of the area. Through the process, the Town and community stakeholders developed a vision of an improved and energized identity as a unique ecological, historical, and adventure tourism destination in southwestern Virginia. A variety of hospitality facilities, sightseeing trails, and outdoor activities will boost Saltville’s small town amenities and help promote small local businesses. While great efforts have already been made to bolster Saltville as a recreation destination, one vital resource is still not in place – the Town has no overnight lodging.

Therefore, with significant community input, CDAC developed a conceptual reuse plan for the subject property as a campground. The proposed campground at the former Town Shop property on Lake Drive will provide residents and visitors with unique camping opportunities and outdoor activities that fill an important gap in the Town’s local offerings.

ii. Outcomes and Benefits of Reuse Strategy

Currently sitting empty and vacant, the reuse of the subject property as a campground will encourage visitors to stay overnight, while stimulating local entrepreneurs to open businesses that support the campers’ needs. The conceptual design for the campground includes different lodging options, including basic tent camping pads, RV sites, cabins, yurts, and historical camping experiences. The design also includes other potential revenue generating features, such as a highropes course and adventure climbing experiences. The campground is designed to be built out in phases, with the basic camping features installed first and the upgraded campsites and amenities added as the campground successfully generates revenues. The initial phase’s design includes approximately 20 tent pad campsites, 15 RV campsites, and a bathhouse. Later phases could include 8 cabins, 6 yurts, and 6 civil-war themed tents. The design leverages the site’s natural topography to create attractive camping locations with views overlooking the wellfields area and the unique inland salt marsh habitat of the area. The design also leaves the low-lying area, which is in the floodplain, with the tributary on the northern portion of the site in its natural state.

A study on the economic impact of campgrounds in the state of New York concluded that campgrounds generated nearly $3,000 in on-site sales for each campsite. On-site sales included camp membership fees, camp recreation fees, on-site food and beverage purchases, and miscellaneous rental costs. In addition, the study found over $6,000 per campsite in off-site spending on dining, groceries, and retail; and $2,250/campsite on other recreational activities. Using those projections, the initial 35 campsites would equate to an economic impact of almost $400,000 per year. However, recognizing the lower costs in and around Saltville than in New York and the fact only basic amenities will first be implemented, even a conservative estimate (50% of NY’s) shows a potential impact of $52,500 on-site; $105,000 in off-site dining, groceries, and retail; and $39,375 for offsite recreation. This economic impact of the campground will directly benefit the Town’s small, low-income population by providing jobs and other economic opportunities for the disadvantaged community (see Sec.2a).

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

The EDA of Smyth County is leading the redevelopment of the Town Shop site. One of the primary goals of the EDA is to promote the economic development and diversification of the Town's employment and tax base. As a recognized Authority under the code of Virginia, the EDA

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is eligible for several relevant federal and state grants. The EDA is committed to seeking funding from any additional sources (local, state, federal, and private) to complete the remediation and redevelopment of the site. If unexpected questions arise and further assessment or redevelopment planning is needed, then the EDA may pursue a grant from the Virginia Brownfields Assistance Fund (VBAF) of up to $50,000. The EDA will use existing resources and labor of partner organizations (Town or County) to complete some of the initial site development work, including the construction of internal roads, trails, and campsites. The EDA will also pursue funding from the Virginia Department of Conservation and Recreation and the Appalachian Regional Commission (ARC) to construct amenities and improve the site.

ii. Use of Existing Infrastructure

As a former industrial site, sufficient existing water and electrical utilities exist at the site to be reused for the proposed redevelopment. The Town’s wastewater main is located a little over 500 feet from the site and will need to be extended to provide service to the proposed bathhouse. Funding from CDBG or ARC will be sought for the extension.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community’s Need for Funding

The closure of the Olin Company plant significantly impacted the Town of Saltville and the surrounding areas. In the decades following the closure, the Town lost almost one-third of its population, dropping to just 1,824 by the 2020 Decennial Census. The EDA and the Town are taking proactive steps towards revitalization and to attract new businesses and residents. However, as the following table shows, the community remains severely financially challenged.34

<table>
<thead>
<tr>
<th></th>
<th>Saltville</th>
<th>Smyth County</th>
<th>Virginia</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>1,824</td>
<td>29,800</td>
<td>8,631,393</td>
</tr>
<tr>
<td>Population under 18</td>
<td>28.5%</td>
<td>19.8%</td>
<td>22.3%</td>
</tr>
<tr>
<td>Per Capita Income</td>
<td>$17,236</td>
<td>$22,319</td>
<td>$36,268</td>
</tr>
<tr>
<td>Median Household Income</td>
<td>$34,417</td>
<td>$40,544</td>
<td>$68,766</td>
</tr>
<tr>
<td>Median Home Value</td>
<td>$79,700</td>
<td>$89,600</td>
<td>$255,800</td>
</tr>
<tr>
<td>Homes Built Prior to 1970</td>
<td>58.6%</td>
<td>42.4%</td>
<td>32.0%</td>
</tr>
<tr>
<td>Unemployment</td>
<td>7.6%</td>
<td>6.3%</td>
<td>5.5%</td>
</tr>
<tr>
<td>Poverty Rate - Individuals</td>
<td>34.5%</td>
<td>17.4%</td>
<td>11.2%</td>
</tr>
<tr>
<td>Poverty Rate - Families w/ Children under 18</td>
<td>47.1%</td>
<td>21.6%</td>
<td>12.3%</td>
</tr>
<tr>
<td>Poverty Rate - Families w/ Children under 5</td>
<td>90.6%</td>
<td>36.9%</td>
<td>11.8%</td>
</tr>
</tbody>
</table>

- Population from 2020 Decennial Census
- All economic and demographic data from 2015-2019 ACS 5-year Estimates

The EDA, County, and Town’s financial resources are extremely limited and the small, low-income population, makes funding the remediation of the site impossible without assistance. The EPA grant funding is essential to accomplish the cleanup and begin the redevelopment of the subject property. The site’s reuse as a campground will spur additional economic growth within the Town and the County and create new job and economic opportunities for the community.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

The target area consists of a low-income, disadvantaged community with an elevated

3 US Census, 2020 Decennial Census
4 2015-2019 American Community Survey 5-year Estimates
percentage of the population under the age of 18 (28.5% versus 22.3% for VA). This population is particularly sensitive to contaminants (such as the heavy metals, petroleum constituents, and PAHs found in site soils) that may affect developmental issues and/or are linked to cancers and other diseases. Storm water runoff from the site drains to a tributary along the northern boundary that feeds the North Fork of the Holston River, a potential pathway for site contaminants to migrate offsite. In order to protect sensitive populations and valuable natural resources, efforts must be made to reduce both point and non-point source pollution, such as runoff from contaminated soils.

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

According to data culled from the most recent available data 2021 County Health Rankings report (data is unavailable at the Town level), Smyth County ranked very poorly overall at 112th of all 132 counties in Virginia. The county ranked in the bottom quartile (least healthy) in both health factors and outcomes. The county has elevated rates of health outcomes when compared to the state including: premature death (80% greater than VA), low birthweight (9% vs 8% for VA), and diabetes prevalence (18% vs 11% for VA). Exposure to environmental contamination has been linked to low birth weight. In addition, the National Cancer Institute’s State Cancer Profiles (2012-2016) show higher incidence of cancer in Smyth County (town level data not available) than in Virginia. Specifically, Smyth County experiences higher rates of Lung & Bronchus Cancers (85.8 compared to 58.6 for state), Colon & Rectum Cancers (40.7 vs 35.8 for state), and Brain Cancers (8.3 vs. 6.1), where the county is 4th highest in the state. Contaminants at the subject site, such petroleum products, solvents, pesticides and metals, have been linked to Brain and Colon cancers.

As the buildings on the subject property continue to deteriorate, asbestos is at risk of being exposed to the open environment. Asbestos is known to cause respiratory diseases, such as asbestosis, lung cancer and mesothelioma. Site investigations have also found PAHs and petroleum constituents in site soils. With funding from this grant, the mitigation of site will reduce the targeted community’s exposure risk and help improve the County’s incidence of disease and adverse health conditions.

(3) Promoting Environmental Justice

The Target Area is economically impoverished and disproportionately shares the negative consequences of industrial operations. Once the center of salt production and chemical manufacturing, the Town was built by predecessors to the Olin Company. For years, the plants poured tons of waste into the North Fork of the Holston River or holding areas, where it then seeped into the ground. Some of that waste was mercury, exposure to which can cause loss of hearing and memory and damage to the brain and kidneys. Added to the Superfund National Priorities List in 1983, Olin has spent over $100 million over the past 40 years trying to clean up the pollution left by its former operations. Signs along the North Fork of the Holston River caution against eating the fish due to contaminant accumulation in fish. The Town and the downriver communities continue to bear the environmental legacy of the plants that closed in 1972.

In addition to the Superfund site, the company left behind numerous other sites that once supported company operations and employees. Once the plant closed, many of these sites sat unused, fell into disrepair, and became brownfields. They have continued to weigh heavily on the Target Area, and their blight has likely depressed the median home values in Town (see table above). Unaware at the time of the risks from its environmental history, the Town accepted the former maintenance shop from the company and began using it as the Town Shop. After structural issues with the building rendered it unsafe for use, the Town was forced to move its operations to another site. Recognizing the current negative impact of the brownfield site but also its potential, the EDA acquired the site in 2021 and is committed to facilitating its remediation and
redevelopment as a campground. Cleanup of contaminated soils, debris, and ACM will directly benefit the welfare of this disadvantaged community, and the redevelopment of the site will bring new economic opportunities to the Town.

b. Community Engagement

i. Project Partners and ii. Project Partner Roles

<table>
<thead>
<tr>
<th>Partner Name</th>
<th>Point of contact</th>
<th>Specific role in the project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Town of Saltville</td>
<td>Mr. Brian Martin, Town Manager, <a href="mailto:townmanager@saltville.org">townmanager@saltville.org</a> (276) 496-5342</td>
<td>Coordinate local Town of Saltville efforts and resources for the project. Pursue funding from additional sources.</td>
</tr>
<tr>
<td>Friends Community Church</td>
<td>Michael Maiden, Pastor <a href="mailto:Network.friendschurch@gmail.com">Network.friendschurch@gmail.com</a> (276) 496-7686</td>
<td>Communicate and encourage participation by members, provide input on cleanup plans, participate in redevelopment planning</td>
</tr>
<tr>
<td>Saltville-Rich Valley Lions Club</td>
<td>Mamie Maule <a href="mailto:mbmaule@comcast.net">mbmaule@comcast.net</a> (276) 496-4253</td>
<td>Communicate and encourage participation by members, provide input on cleanup plans, participate in redevelopment planning</td>
</tr>
<tr>
<td>Smyth County Chamber of Commerce</td>
<td>Sarah Gillespie <a href="mailto:sgillespie@smythchamber.org">sgillespie@smythchamber.org</a> (276) 783-3161</td>
<td>Promote the redevelopment of the site; assist with community outreach</td>
</tr>
<tr>
<td>Museum of the Middle Appalachians</td>
<td>Harry Haynes <a href="mailto:info@museum-mid-app.org">info@museum-mid-app.org</a> (276) 496-3633</td>
<td>Provide historical information about the site; provide input on cleanup options; assist with redevelopment plans, including interpretive displays</td>
</tr>
</tbody>
</table>

iii. Incorporating Community Input

The EDA will continue to build upon the community outreach efforts conducted to create the redevelopment concept and master connectivity plan for the Town. As such, a series of community meetings will be held at Town Hall, located a short distance from the subject site. The meetings will include a virtual option to accommodate those that cannot attend for health or other reasons, or will switch to completely virtual, if mitigation measures due to COVID-19 need to be implemented. The meetings will be held before key milestones, including at the project kick off, prior to site work commencing, and after site work is completed. In support of these efforts, we will prepare outreach and promotional materials to be distributed at meetings, via mail, newspapers, and the Town's website and social media. We will also continue to reach out to local reporters to ensure the information, public meetings, requests for input, and project successes are covered in the local media. Input on project activities and decisions, such as on the remedial options, cleanup activities (e.g., truck routes, hours of operations, protective measures, etc.), and redevelopment plans, will be solicited from residents and community stakeholders throughout the project via these meetings and outreach channels. The EDA’s project team will carefully consider all input and community feedback for incorporation and provide responses directly to the community on how it was considered and incorporated.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

VDEQ has been integrally involved throughout the assessment and cleanup planning phases for the subject property, including the award of a VBAF grant to supplement EPA Brownfields Assessment funds for the Phase II ESA at the site. The VDEQ Project Manager will continue to provide oversight, review, and approval of all cleanup activities. A draft ABCA was completed in November 2019 and recommended the following remedial option to address ACM, PAHs, metals, and petroleum constituents as the contaminants of concern (COC) for this project. The site cleanup
activities will include removing the first 1 – 2 feet of contaminated soil in three distinct areas, installing a demarcation barrier, and backfilling with an approved backfill material to grade (cap); the removal and proper closure of the former UST; the characterization, removal, and proper disposal of drums and miscellaneous debris at the site; and the abatement of identified ACM in the onsite structures prior to an anticipated demolition. The three areas of soil contamination to be excavated include an approximate 4,200 square foot (sqft) area impacted by metals (lead) at the former gun range, an approximate 200 sqft area impacted by naphthalene and PAHs near a former UST, and an approximately 27,000 sqft area impacted by PAHs and metals behind the shop building, where materials have been landfilled. The soil and materials will be excavated to a depth of 2 feet, a demarcation barrier will installed, and the area will be backfilled to grade with 1-1.5 feet of clay and 0.5-1 feet of topsoil. The cap (barrier, clay, and top soil) will be maintained as an engineering control to prevent future exposure and migration of contaminants.

The recommended option addresses the risks associated with the COCs, thereby removing the exposure threat to users or offsite receptors and making the site suitable for redevelopment as a campground to serve the Town’s tourism industry.

b. Description of Tasks and Activities

<table>
<thead>
<tr>
<th>Task 1 – Project Management:</th>
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<tbody>
<tr>
<td>i. EDA Project Manager will be responsible for the overall execution and management of the project. She will track project tasks, schedule and budget; procure and oversee the work of the Qualified Environmental Professional (QEP); procure and oversee the brownfields cleanup contractor; and report on project activities and accomplishments to stakeholders. The QEP will support reporting activities and will develop a Final Cleanup Report to document all project activities.</td>
</tr>
<tr>
<td>ii. Schedule: October 1, 2022, to September 30, 2025; QEP Procurement no later than 1st quarter; cleanup contractor procurement in 2nd quarter</td>
</tr>
<tr>
<td>iii. Lead: EDA Project Manager</td>
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<tr>
<td>iv. Outputs: 12 Quarterly Reports, 3 DBE reports, 3 FFRs, 1 Final Cleanup Report</td>
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<tr>
<th>Task 2 – Community Outreach:</th>
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<tbody>
<tr>
<td>i. The EDA will work closely with our community partner organizations throughout the project. The EDA will plan and conduct a series of stakeholder meetings at key milestones in this project. The EDA will establish an information repository and will communicate project information through local newspapers, social networking platforms, and other electronic means.</td>
</tr>
<tr>
<td>ii. Schedule: October 1, 2022, to September 30, 2025 with key public meetings in October 2022 (kickoff), January 2023 (prior to cleanup start), May 2023 (after cleanup), and January 2024 and July 2024 during redevelopment</td>
</tr>
<tr>
<td>iii. Lead: EDA Project Manager; Assist: QEP</td>
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<tr>
<td>iv. Outputs: 6 Community Meetings, 12 Articles or Outreach Collateral</td>
</tr>
</tbody>
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<tr>
<th>Task 3 – Cleanup Planning</th>
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<tbody>
<tr>
<td>i. Activities will include finalizing the ABCA document to include obtaining review and approval from EPA and VDEQ Project Managers, placing the ABCA on a 30-day public review and comment period, preparing the Quality Assurance Project Plan (QAPP) for confirmation soil sampling, negotiating and receiving the necessary regulatory approvals, and preparing bid documents for the solicitation of cleanup contractors.</td>
</tr>
</tbody>
</table>
### Task 4 – Site Cleanup

**i.** EDA will use the majority of the grant funds for the actual site cleanup activities. The EDA will competitively procure a remediation contractor, which the Project Manager will oversee with the assistance of the QEP. Based on the Phase II ESAs of the property and the findings from the draft ABCA, contractor cleanup activities are estimated to include contaminated soil and debris removal and disposal, capping, and ACM abatement. The QEP will work with VDEQ to certify the cleanup is complete.

**ii.** Schedule: February 1, 2023, to April 15, 2023

**iii.** Lead: Contractor; Assist: QEP, EDA Project Manager

**iv.** Outputs: 1 Certificate of Completion

### c. Cost Estimates and Outputs

<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Project Tasks ($)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Project Management</td>
</tr>
<tr>
<td>Direct Costs</td>
<td></td>
</tr>
<tr>
<td>Personnel</td>
<td></td>
</tr>
<tr>
<td>Fringe Benefits</td>
<td></td>
</tr>
<tr>
<td>Travel</td>
<td>$5,000</td>
</tr>
<tr>
<td>Equipment</td>
<td></td>
</tr>
<tr>
<td>Supplies</td>
<td></td>
</tr>
<tr>
<td>Contractual</td>
<td>$18,000</td>
</tr>
<tr>
<td>Other</td>
<td></td>
</tr>
<tr>
<td>Total Direct Costs</td>
<td>$23,000</td>
</tr>
<tr>
<td>Indirect Costs</td>
<td></td>
</tr>
<tr>
<td>Federal Share</td>
<td>$23,000</td>
</tr>
<tr>
<td>Cost share</td>
<td>$0</td>
</tr>
<tr>
<td>Total Funding Requested</td>
<td>$23,000</td>
</tr>
</tbody>
</table>

All cost estimates are based upon costs incurred on CDAC’s EPA Brownfields Assessment Project and information provided by the QEP from similar brownfield cleanup projects.

**Task 1 – Project Management:**

| Travel Costs | 2 staff attend 2 regional workshops (2x2x500/person), 2 staff attend national conference (2x1,500/person) = $5,000 |
| Contractual Costs | 36 project team meetings (36x250); 12 Quarterly Reports (12x300); 3 annual reports (3x100); 1 final summary report (2,100); quarterly ACRES updates (12x250) = $18,000 |

**Task 2 – Community Outreach:**

| Contractual Costs | Outreach meetings (6x1,000); Articles/media updates (12x250) = $9,000 |

**Task 3 – Cleanup Planning:**

| Contractual Costs | Finalize ABCA, including incorporating comments from public notice and regulatory review ($2,500); QAPP ($3,000); Health & Safety Plan |
(HASP) ($1,000); Development of bid documents (RFP) for site cleanup activities, evaluation of bids, calling references, coordination of a pre-bid onsite meeting and selection of contractors ($10,500) = $17,000

Task 4 – Site Cleanup:

Contractual Costs:

Soil confirmation and waste characterization sampling ($18,000);
Excavation and Disposal of Contaminated Soil: Assuming 2,325 CYD of soil to be removed at $39/CYD (2,325 CYD x $39 = $90,675); Backfill will clay and top soil at $20/CYD (2,325 CYD x $20 = $46,500); Abate 5,000 sqft of asbestos-containing vinyl floor tile ($4/sqft = $20,000), 20 windows with caulking ($300/window = $6,000), and 1,000 sqft of roofing material ($5/sqft = $5,000); Remove properly close former UST ($8,500); and Characterize, Remove, and Dispose of drums and debris ($6,325) = $201,000

In summary, the total cost of project activities is estimated to be $250,000. Project tasks are scheduled to be completed well within the three-year timeframe of this grant. The EDA of Smyth County is requesting $250,000 in EPA cleanup funds and a cost-share hardship waiver for the required 20% match contribution of $50,000. If the hardship waiver is not approved, the EDA will attempt to meet the cost share requirements by securing a $50,000 VBAF grant from the state (funds available after July 1, 2022) and/or through the in-kind contributions of the EDA’s and Town staff’s labor.

d. Measuring Environmental Results

The EDA’s project team will meet quarterly to track the project’s progress in fulfilling the scope of work, goals, and objectives. Each Quarterly Report submitted to EPA will include an update of project expenditures and will track activities and expenses against the project’s schedule. If needed, corrective actions will be taken to ensure the project remains on schedule, within budget, and completed within the three-year period of performance. Specific performance metrics detailed in the Work Plan will be used to summarize project accomplishments, and the project team will review and insure that all reporting requirements are being met timely and the project continues to comply with all terms and conditions of the grant. Additionally, site-specific information will be routinely entered and tracked in the online ACRES database. At a minimum, the outputs to be tracked include the number of public meetings, meetings with community groups, cleanup report, final ABCA, and final redevelopment plan; and, the outcomes to be tracked include community participation, acres ready for reuse, redevelopment dollars leveraged, and jobs created.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure and ii. Description of Key Staff

The EDA of Smyth County is an independent economic development agency created under Virginia state law to serve the County of Smyth. The EDA will communicate with the Town of Saltville during the implementation of the grant project. Ms. Kendra Hayden, EDA Economic Development Specialist, will serve as the project director. She has worked for Smyth County in roles of increasing responsibility since 2015. Prior to her role with the County, Ms. Hayden held positions in the banking and broadcast advertising industries. Ms. Hayden will also manage the fiscal responsibilities associated with the EPA grant. As part of her day to day responsibilities Ms. Hayden tracks and manages the finances of several economic development grants and the organization’s general finances. Mr. Shawn Utt, Smyth County Administrator, will support Ms.
Hayden’s efforts. In his role he is responsible for guiding the overall direction of development and growth for Smyth County. Mr. Utt has over 20 years experience leading municipal and county government organizations. He has successfully attracted over $400 million in industrial investment to southwest Virginia creating over 1,000 new jobs.

iii. Acquiring Additional Resources

After announcement of grant awards, the EDA of Smyth County will follow procurement procedures in compliance with state and federal (2 CFR 200 and EPA’s rule at 2 CFR 1500) requirements to procure an experienced brownfields consultant (QEP). The selected consultant will support the project management, cleanup planning, and cleanup oversight for this project. The consultant will assist the EDA with the development of bid specifications for a remediation contractor. The EDA will then again follow the compliant procedures to procure a remediation contractor to complete the contaminated soil and debris removal, capping, and ACM abatement activities on the site.

b. Past Performance and Accomplishments

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

(1) Accomplishments

<table>
<thead>
<tr>
<th>Date</th>
<th>Awarding Agency</th>
<th>Amount</th>
<th>Accomplishments</th>
<th>Specific Outputs And Outcomes</th>
</tr>
</thead>
<tbody>
<tr>
<td>2021</td>
<td>Agriculture &amp; Forestry Industries Dev. Fund</td>
<td>$250,000</td>
<td>Creation and expansion of new business leading to new job creation and capital expenditure.</td>
<td>Create 80 new jobs and $7,500,000 in new capital investment</td>
</tr>
<tr>
<td>2020</td>
<td>CARES Act Funds</td>
<td>$300,000</td>
<td>Provide emergency operational funding to businesses impacted by COVID-19</td>
<td>Provided funds to over 60 local businesses for a range of uses</td>
</tr>
<tr>
<td>’2018</td>
<td>Tobacco Region Opportunity Fund</td>
<td>$810,000</td>
<td>Creation and expansion of 3 businesses leading to new job creation and capital expenditure.</td>
<td>Create 202 new jobs and $38,390,000 in new capital investment</td>
</tr>
<tr>
<td>’2018</td>
<td>Commonwealth Opportunity Fund Grant</td>
<td>$550,000</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*These two grants were part of the same economic development project

(2) Compliance with Grant Requirements:

The EDA of Smyth County met all of the requirements and conditions of the grant funding described above, including regular reporting to the granting agencies, completing projects according to the work plans and schedules, achieving and reporting the expected results, submitting all required reports in a timely manner, and complying with all grant terms and conditions.
Saltville Town Shop
Threshold Criteria for Cleanup Grants

1. **Applicant Eligibility**
   The Economic Development Authority (EDA) of Smyth County is an economic development entity created under Virginia State Law, which operates under the supervision and control of Smyth County. The EDA is composed of a seven member Board of Directors appointed by election district by the Smyth County Board of Supervisors.

2. **Previously Awarded Cleanup Grants**
   The Former Town Shop Property has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. **Expenditure of Existing Multipurpose Grant Funds**
   The EDA does not have an open EPA Brownfields Multipurpose Grant.

4. **Site Ownership**
   The Economic Development Authority of Smyth County acquired the Former Town Shop Property and recorded the deed in June 2021.

5. **Basic Site Information**
   a) Saltville Town Shop
   b) 302 Lake Drive, Saltville, Virginia 24370
   c) Economic Development Authority of Smyth County

6. **Status and History of Contamination at the Site**
   a) Contamination at the Site is Hazardous Substances.
   b) Historically, extensive solution salt mining has occurred on the site, involving the injection of water and extraction of salt brine from onsite wells. Some of the oldest salt brine wells in Saltville were located at the town shop site. At the time, saline water was extracted from the wells and boiled in furnaces housed in open sheds. About 75 shallow [200-400 feet below ground surface (bgs)], low pressure, salt brine wells were located on adjacent parcel to the north, and operated until circa 1930. The valley has been subjected to large-scale subsidence as a result of shallow salt brine extraction. Deep (2,000-4,000 feet bgs), high pressure, solution salt mining began circa 1930 from onsite salt wells located at higher elevations and continues to this day. A large collapse occurred at three (3) salt wells on the southwest property corner in 1960. Salt caverns began to be used for natural gas storage circa 2000. Currently, Saltville Gas Storage Company, LLC, uses onsite salt caverns for natural gas storage on the adjacent parcel. Until the building was condemned due to structural issues, the town used the shop building and surrounding parking areas for light maintenance and equipment, vehicle, and material storage. The site is currently not in use.
   c) Onsite environmental concerns include PAHs (naphthalene, benzo(a)anthracene, benzo(a)pyrene, and dibenz(a,h)anthracene), metals
(arsenic, chromium, and lead), and petroleum constituents in site soils. Additionally, the widespread elevated presence of salt brines at the site likely poses an environmental concern for ecological health. Uncharacterized, partially full drums are also present on the site. Asbestos-containing materials (vinyl floor tile, window caulking, and roofing material) are present in the town shop and pump house structures.

d) PAH (napthalene, benzo(a)anthracene, benzo(a)pyrene, and dibenz(a,h)anthracene), metals (chromium) and petroleum contamination in site soils is presumed to be derivative of historical operations on the site, including hazardous material storage and onsite dumping/landfilling of miscellaneous materials. Lead contamination in site soils is presumed to be derivative of a former onsite gun range and is contained within the area of the former gun range. Uncharacterized, partially full drums are also present behind the building on the site. Asbestos-containing materials (vinyl floor tile, window caulking, and roofing material) are present in the town shop and pump house structures.

7. **Brownfields Site Definition**
   a) The site is not listed or proposed for listing on the National Priorities List.
   b) The site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.
   c) The site is not subject to the jurisdiction, custody, or control of the United States government.

8. **Environmental Assessment Required for Cleanup Grant Applications**
   Phase I ESAs were conducted to identify RECs in connection with the site and to evaluate future potential liability associated with past or current practices onsite. A Phase I ESA was completed at the site on June 14, 2017, and an updated Phase I ESA was completed on April 30, 2019. An additional Phase I ESA was completed on March 31, 2021, as part of the due diligence to support the property acquisition by the EDA of Smyth County. An Asbestos-Containing Materials Survey was completed on April 25, 2018, in the remaining town shop and pump house structures. A Phase II ESA was completed on October 30, 2017, at the subject property to gain a better understanding of site conditions, and to better define the extent of contamination in site media. As a result of these investigations, ACM was revealed to be present within vinyl floor tile, window caulking, and roofing material in the town shop and pump house, and site soils were revealed to have been impacted by PAHs, metals, and petroleum constituents.

9. **Enforcement or Other Actions**
   The EDA is not aware of any ongoing or anticipated environmental enforcement or other actions related to the subject site, nor of any inquiries or orders from federal, state, or local government entities on the subject property.

10. **Sites Requiring a Property-Specific Determination**
    The Saltville Town Shop does not require a property-specific determination.
11. **Threshold Criteria Related to CERCLA/Petroleum Liability**

(a) Property Ownership Eligibility – Hazardous Substances Sites

   iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY

   (1) Bona Fide Prospective Purchaser Liability Protection

   a. **Information on Property Acquisition**

      i. The EDA of Smyth County acquired the property via transfer from the Saltville Industrial Development Authority (SIDA)

      ii. June 24, 2021

      iii. Fee simple title

      iv. SIDA

   v. None. EDA of Smyth County is an independent economic development agency created under Virginia state law. The members of the EDA of Smyth County Board of Directors are appointed by the Smyth County Board of Supervisors.

   b. **Pre-purchase Inquiry**

      Prior to acquiring the property in June 2021, an AAI environmental professional from Cardno, Inc., completed an ASTM E1527-13 Phase I ESA on March 31, 2021 on behalf of the EDA of Smyth County. The Phase I identified the following previous assessments completed by Cardno, Inc. personnel: ASTM E1527-13 Phase I ESA completed by an AAI environmental professional on April 30, 2019, for the SIDA and a Phase I, which was completed on June 14, 2017, for the Town of Saltville. An ASTM E1903-11 Phase II ESA was completed by a Professional Geologist on October 30, 2017, for Town of Saltville. Also an Asbestos-containing Materials Survey was completed by a licensed asbestos inspector on April 25, 2018, for Town of Saltville.

   c. **Timing and/or Contribution Toward Hazardous Substance Disposal**

      The disposal of hazardous substances at the site occurred prior to the EDA of Smyth County’s acquisition of the property. The EDA has not caused or contributed to any release of hazardous substances at the site and has not, at any time, arranged for the disposal of hazardous substances at the site nor transported hazardous substances to the site.

   d. **Post-Acquisition Uses**

      Since acquisition, the site has only been used for storage.

   e. **Continuing Obligations**

      i) No on-going releases of hazardous substances were discovered on the site and the EDA of Smyth County took every reasonable step to stop any known releases.

      ii) The EDA took all reasonable steps to prevent any future releases by limiting access to the site.

      iii) In order to prevent and/or limit exposure to site contaminants, site access is limited by an entrance gate. The public in general and site
users do not have access to the hazardous substances on the site. The structure is condemned and secured.

The EDA of Smyth County confirms and affirms its commitment to:

i) Comply with all land-use restrictions and institutional controls.

ii) Assist and cooperate with those performing the cleanup and provide access to the property.

iii) Comply with all information requests and administrative subpoenas that have or may be issued in connection with the property.

iv) Provide all legally required notices.

12. Cleanup Authority and Oversight Structure

a) The EDA of Smyth County plans to enroll the site into the Virginia Voluntary Remediation Program (VRP), the VRP will provide regulatory authority and oversight of cleanup activities. During site cleanup activities, the EDA will comply with all applicable federal and state laws and ensure that the cleanup is protective of human health and the environment. The EDA will rely on the technical expertise of a brownfield/environmental consultant to manage, oversee, and complete cleanup activities at the site. The EDA will procure the qualified consultant with brownfields experience through a competitive process in accordance with 2 CFR 200 and 2 CFR 1500.

b) The Town of Saltville owns adjacent property. If off-property access is necessary for any of the proposed removal activities, the Town has committed to providing access.

13. Community Notification

a) Draft Analysis of Brownfield Cleanup Alternatives (ABCA)

A copy of the Draft ABCA is attached. Cleanup alternatives and a recommended cleanup plan were presented in the public meeting held on November 10, 2021.

b) Community Notification Ad

The Authority placed a Legal Notice in the Smyth County News & Messenger. The legal notice was published on November 3, and November 6, 2021, to advertise the public meeting held in the Board of Supervisors meeting room on November 10, 2021. A copy of the ad is attached.

c) Public Meeting

The public meeting to discuss the cleanup project, the grant application, and the draft ABCA was held at the Smyth County Board of Supervisors Meeting on November 10, 2021. Mr. Joe Morici, of Cardno, Inc., presented the findings of the ABCA and the grant application and process. He was available to answer any questions regarding the ABCA and the cleanup project at the site. No comments were received on the ABCA or grant application. A summary of events at the public meeting and a sign in sheet are attached.

d) Submission of Community Notification Documents

The following are attached:

- Copy of the Draft ABCA, Cardno, Inc., dated November 7, 2019
• Copy of the Legal Notice in the *Smyth County News & Messenger* from November 3, and November 6, 2021
• No comments on the ABCA or grant application were received during the public meeting or from the community during the public notice/comment period (ending November 24, 2021)
• A summary of the public meeting and activities
• A copy of the sign-in sheet

14. **Statutory Cost Share**
   a) The EDA of Smyth County is requesting $250,000 in EPA cleanup funds and a cost-share hardship waiver for the required 20% match contribution of $50,000. If the hardship waiver is not approved, the EDA will attempt to meet the cost share requirements by securing a $50,000 VBAF grant from the state (funds available after July 1, 2022) and/or through the in-kind contributions of the EDA’s, County’s, and Town staff’s labor.

   b) The EDA is requesting a hardship waiver (**See Attached**).

15. **Waiver of the $500,000 Limit**
    The EDA is not requesting a waiver of the $500,000 limit.

16. **Named Contractors and Subrecipients**
    Not applicable. The EDA will procure subcontractors in accordance with 2 CFR Part 200 and 2 CFR Part 1500 after notification of grant award.