



RE: FY2026 EPA Brownfields Cleanup Grant Application

The County of Giles, Virginia is pleased to submit this proposal for FY2026 Brownfields Cleanup Grant funding. Below we provide the information requested.

1. Applicant Identification:

County of Giles, Virginia
1 Taylor Avenue, Suite 2
Pearisburg, Virginia 24134

2. Website URL:

<https://virginiasmtnplayground.com/>

3. Funding Requested:

- (a) Grant Type: Single Site Cleanup
- (b) Federal Funds Requested: \$3,693,800

4. Location:

- (a) Town: Pearisburg
- (b) County: Giles
- (c) State: Virginia

5. Property Information:

Former Leas & McVitty / New River Tannery
Tannery Road, Pearisburg, Giles County, Virginia 24134
37.341696, -80.752079

6. Contacts:

- (a) Project Director:
Name: John Hale, Special Projects Manager
Phone: (540) 921-2525 (ext. 1121) | Email: jhale@gilescounty.org
Mailing Address: 1 Taylor Avenue, Suite 2, Pearisburg, Virginia 24134

- (b) Chief Executive/Highest Ranking Elected Official:
Name: Jeffrey Morris, Board of Supervisors Chair
Phone: (540) 599-1544 | Email: jmorris@gilescounty.org
Mailing Address: 1 Taylor Avenue, Suite 2, Pearisburg, Virginia 24134

7. Population:

Pearisburg, Virginia: 2,864 (2023: American Community Survey 5-Year Estimate)



8. Other Factors Checklist:

Other Factors	Page #
Community population is 15,000 or less.	5
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority 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).	2
The proposed site(s) is in a federally designated flood plain.	2
The reuse of the proposed site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the proposed site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local resilience to the impact of extreme weather events and natural disasters.	3, 4
The target area(s) is impacted by a coal-fired power plant has recently closed (2015 or later) or is closing.	1

9. Releasing Copies of Applications

Not applicable.

1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:

Target Area & Brownfields

1.a. Overview of Brownfield Challenges & Description of Target Area: Giles County, appropriately known as Virginia's Mountain Playground, is endowed with spectacular natural beauty and surrounded by the Appalachian Mountains. Giles County features thirty-seven miles of the New River that meanders through many scenic routes and historic towns of the County. Sixty-one miles of the Appalachian Trail traverse the northern section of the County, featuring many popular mountain scenery viewpoints along the way. Like many other rural areas in Appalachia, residents of Giles and its small towns face numerous challenging economic and social issues including population loss, an aging populace, an abnormally high incidence of health-related issues and illicit drug use, as well as negative impacts related to the significant decline of manufacturing and natural resource extraction industries. Located in the heart of Giles County, the Town of Pearisburg (Target Area) is situated on a plateau above the New River, at the intersection of U.S. Route 460 and State Route 100. Originally established as "Giles Court House" in 1811, the Town's population was less than 300 people. Population in the area steadily grew as industry was introduced, particularly with the construction of tannery plants, most notably the "Leas & McVitty" (L&M) tannery operations, later known locally in Pearisburg as the "New River Tannery." Originally founded in 1812 in Pennsylvania, L&M began a southward move of its operations into Virginia in 1889 and quickly established the New River Tannery in Pearisburg in 1894, due to the area's abundance of chestnut oak, water supply, and labor. The Town's population quickly grew from 668 to 2,268 people. During World War II, all of the leather produced at the New River Tannery went directly into military use to make millions of pairs of shoes for armed forces personnel. The tannery operation represented a period of economic stability for the community and was one of the County's leading employers in the early twentieth century.

The 1970s marked a period of serious economic downturn for traditional manufacturing and resource-based industries in Appalachia. The tanning industry was hit very hard by loss of local raw materials from chestnut blight, and the introduction of cheaper leather imports and synthetic materials reduced the demand for leather produced by domestic tanning operations. Manufacturing operations were phased out at the New River Tannery in the late 1960s, and by 1972, wooden structures and other buildings at the site were reportedly burned as part of the demolition process. For more than 50 years, the former Leas & McVitty / New River Tannery site has sat vacant and underutilized, with serious legacy environmental concerns from its use for over 70 years as a tanning operation. As the tannery era ended, Giles County's economy continued to rely on other resource-based and manufacturing industries. For much of the 20th century, coal and energy production became dominant economic drivers, shaping the region's workforce and identity. However, like tanning, these industries eventually faced steep decline, with very little to replace them.

The County and its localities, where roughly 20% of the workforce is employed in manufacturing, continue to struggle with industry exodus. Our proud Appalachian community is also facing significant ongoing challenges from the decline of coal and related industries. A major economic driver for decades was the Appalachian Electric Power (AEP) coal-fired plant in Glen Lyn, which employed hundreds of County residents since its construction in 1919. The plant began phasing out operations in 2013 and officially retired in May 2015, resulting in the loss of 44 jobs and more than \$400,000 in annual county tax revenue. In fact, the economic impact of this plant closure was so severe that the town of Glen Lyn dissolved its town charter in 2025—one of only 4 Virginia towns to have ever done so. The broader coal industry downturn also led to closures of manufacturing facilities dependent on the sector, including Caterpillar (formerly Bucyrus) in 2014 (45 jobs lost) and General Electric's Fairchild Mining Equipment plant in 2016 (59 jobs lost). More recently, ESS Technologies consolidated operations out of the County in 2023, eliminating 51 local positions. These losses have placed Giles County in a period of economic transition. To address these challenges, Giles County has proactively pursued outdoor recreation tourism strategies that build on the county's many National Forest, nature-based, and river recreation attractions. Outdoor recreation tourism promotion strategies include the "New River Water Trail" promotional campaign and related resources, which direct visitors to the New River boat launches (for kayaking, fishing, boating, and other recreational activities) and nearby amenities including businesses in the towns. Several of these already improved and promoted tourism hot spots either directly adjoin or are within close proximity to the former Leas & McVitty / New River Tannery. Thus, the Town of Pearisburg is the Target Area for this brownfields cleanup project. The cleanup and redevelopment of the 32.6-acre former Leas & McVitty / New River Tannery target site for recreation will serve as a catalyst to further establish the Town and the greater Giles County area as a tourism destination.

1.b. Description of the Proposed Brownfield Site(s): The former Leas & McVitty / New River Tannery site encompasses approximately 32.6 acres, located between the New River to the north and Norfolk Southern rail tracks to the south. As described in Section 1.a., past land uses include historic tannery operations through the

central portion of the site. Remnants involve a dilapidated water tower, concrete foundations, railroad spurs, and numerous in-ground vats. At least 12 vats have been identified through site investigations, but historical records and dense vegetation suggest that additional buried structures remain undiscovered, with many vats partially or completely filled with rubble, soil, and water. Aside from agricultural fields that occupy the east and west sides of the target property, the site is currently densely vegetated, unoccupied, and has been virtually abandoned for many years.

Historic tannery operations at the site included the storage and use of tanning agents and hide preservatives in former lagoons, basins and vats, as well as other general industrial maintenance activities. Environmental assessments have identified contamination concentrated in specific areas of concern covering approximately 12.4-acres of the 32.6-acre site. Soil sampling revealed arsenic concentrations up to 79.5 milligrams per kilogram (mg/kg) and hexavalent chromium up to 140 mg/kg, both exceeding Virginia Department of Environmental Quality (VDEQ) Voluntary Remediation Program (VRP) Tier III criteria (30 mg/kg and 100 mg/kg, respectively) and representing significant health related and economic risk to future site users. Cyanide was detected in vat water up to 12.5 micrograms per liter ($\mu\text{g/L}$), exceeding Tier II criteria (5.2 $\mu\text{g/L}$) for surface water and Tier III criteria for construction worker direct contact (0.14 $\mu\text{g/L}$), and multiple polycyclic aromatic hydrocarbons (PAHs) in soil also exceed Tier II criteria, contributing to cumulative carcinogenic risk. While shallow groundwater has not been encountered and the deeper aquifer serving the adjacent municipal public water supply (PWS VA1071455) appears to remain unaffected, the presence of cyanide and other mobile contaminants poses significant migration and subsequent serious community health risks, if left unaddressed.

Portions of the target property's northern border as well as the eastern agricultural field lie within Federal Emergency Management Agency (FEMA)-designated Special Flood Hazard Zone A, increasing the risk of contaminant migration and impact upon local and numerous downstream communities, during flooding events. Physical site conditions resulting from historic tannery operations also present significant obstacles to remediation. Former lagoon and basin areas exhibit extremely soft, unstable soils due to decades of waste deposition and incomplete backfilling. Previous clearing efforts resulted in heavy machinery sinking into these areas, demonstrating significant physical hazards and instability. The severity of chemical impacts on citizens and the environment, combined with challenging site conditions and flood risk, highlight the urgent need for cleanup to prevent contaminant migration and enable safe redevelopment. Without cleanup, the target property cannot be safely accessed, developed, or repurposed, leaving it effectively unusable for any productive or community-benefitting purpose.

Revitalization of the Target Area:

1.c. Reuse Strategy & Alignment with Revitalization Plans: In 2020, Giles County was awarded planning assistance through the Recreation Economy for Rural Communities (RERC) program, a national initiative focused on leveraging recreational tourism as a catalyst for rural economic development. This program brought together county officials, community members, and local partners to generate a community driven action plan¹ to support asset-based economic development, downtown revitalization, and conservation and stewardship of the region's natural, cultural, and historic assets. Through seven collaborative meetings and site visits, the RERC team identified four guiding goals: 1) Improve access and infrastructure; 2) Improve mobility and safety; 3) Enhance the visitor experience; and 4) Strengthen partnerships and improve area wide promotion. The target property, located within 1,000 feet of key recreational assets such as the New River Water Trail, Appalachian Trail, and Hale's (Bluff City) Boat Landing, emerged as a topic of priority discussion during this process. A unique island in the New River adjacent to the former tannery site continues to spark interest as a potential feature for connectivity to the Appalachian Trail and other forms of outdoor recreation. Currently, the Appalachian Trail corridor near the property connects to U.S. Route 460 at the New River bridge, requiring hikers to walk along the highway shoulder due to the absence of a dedicated pedestrian path. Community members envisioned reusing the New River Tannery property in combination with the Water Trail and Appalachian Trail, including a pedestrian bridge across the river via the island to the site. These ideas renewed interest in a derelict property long considered "out of sight, out of mind."

By 2025, Giles County initiated acquisition efforts and advanced conceptual planning to align the target property's reuse with the community's vision for connectivity and outdoor recreational tourism. Environmental site assessments and conceptual layouts evaluated residential, commercial, industrial, and recreational options, with particular attention to FEMA floodplain data and resilient design principles. Approximately 39% of the site

¹ Giles County *Community Action Plan*, May 2021: https://www.virginiasmtnplayground.com/wp-content/uploads/2021/10/RERC-Community-Action-Plan_GilesCoVa-Final.pdf

lies within the 100-year floodplain. The recreational reuse option was selected, reflecting overwhelming community and stakeholder support over industrial or manufacturing alternatives. This concept avoids permanent structures in the floodplain and prioritizes open space, athletic fields, and trails that can safely withstand periodic inundation, in contrast to the higher risks and costs associated with industrial development in this location. All proposed new structures, utilities, and parking areas are strategically sited outside of the flood zone to minimize flood risk and ensure long-term viability. Stormwater management features such as bioswales were also incorporated in design, to further enhance site resilience to extreme weather events.

The proposed cleanup and redevelopment will transform the site into a regional hub for recreational tourism, featuring a sports field complex, enhanced river access, and a potential Appalachian Trail connection, as well as space for outdoor recreation-oriented businesses that could benefit from integrated recreational amenities. The reuse strategy not only advances local land use and revitalization plans but also provides an appropriate reuse option that considers flood resilience, ensuring that new investments are protected from future flood events and that the site remains a safe, accessible, and sustainable community asset. Public and partner engagement was central throughout the process. Input was gathered through workshops, interviews, and stakeholder meetings, ensuring the reuse strategy reflects local priorities. Regional planning agencies, outdoor recreation organizations, and local businesses contributed expertise and resources, fostering broad support and collaborative implementation. The selected reuse strategy aligns with the original RERC goals and provides an opportunity to transform the blighted property into a regional asset that promotes economic growth, outdoor recreation, and community well-being.

1.d. Outcomes & Benefits of Reuse Strategy: The proposed redevelopment of the target property will substantially stimulate economic development in Giles County following site cleanup. The County has proactively pursued outdoor recreation tourism strategies as a strategy to combat the growing industry exodus in the region. In 2024, the County's direct and indirect combined tourism economic impact was \$55.5M, and within the last 12 months, the total visitor spend in Giles County was \$14.7M. Capitalizing on the growing recreational economy and proximity of the target property to key recreational resources, the transformation of this long-blighted property into a regional recreational hub will aid in attracting visitors, increasing tourism spending, and creating additional opportunities for outdoor recreation-oriented businesses. The inclusion of a sports field complex, river access, and a potential Appalachian Trail connection positions the site as a destination for events, outfitters, and hospitality services, generating new revenue streams and supporting local job creation. Based on comparable sports tourism and outdoor recreation projects, the redevelopment is projected to generate over \$1.5M–\$2M in new annual visitor spending and support 20–30 local jobs through direct operations, hospitality, and retail activity. This reuse strategy directly aligns with Giles County's vision for sustainable tourism and economic diversification, as outlined in the RERC Community Action Plan. To further strengthen local resilience to impacts of extreme weather events and natural disasters, the redevelopment will incorporate robust stormwater management and native landscaping, which also reduces maintenance and improves ecological function. Planned restroom and shelter facilities will utilize energy-efficient fixtures and lighting, and the County will evaluate solar-ready design for future renewable energy integration. These measures will reduce long-term operating costs, support sustainability, and ensure the site remains a safe, accessible, and valued community resource for years to come.

Strategy for Leveraging Resources

1.e. Resources Needed for Site Characterization: As demonstrated in the letter provided by VDEQ, environmental site assessments and characterizations performed to date have provided a sufficient level of site characterization for the remediation work to begin. Additional funding for site characterization is not expected to be necessary; however, if needed, the County will apply to the Virginia Brownfield Assistance Fund (VBAF), a program run by the Virginia Economic Development Partnership (VEDP) and VDEQ, which provides assessment and planning grants of up to \$50,000. VDEQ has already demonstrated commitment to the project by contributing over \$185,000 for the previously completed environmental site assessments and conceptual site planning efforts at the site.

1.f. Resources Needed for Site Remediation: The County is seeking funding from this EPA cleanup grant to complete the necessary tasks required for the planned remediation of the Former Leas & McVitty / New River Tannery site. The requested amount is sufficient to complete the remediation to VDEQ's requirements for the proposed reuse. As detailed in the Analysis of Brownfield Cleanup Alternatives (ABCA), the cleanup costs are known and a contingency is included in the budget for unexpected expenses. If additional cleanup funding is required, the County is also eligible for cleanup funding from VBAF, which provides remediation grants of up to \$500,000. The grants require a 1:1 match; however, the funds expended under this EPA cleanup grant will count as match to secure a VBAF grant, if needed.

1.g. Resources Needed for Site Reuse: The County plans to pursue state funding opportunities for the planned recreational development, including, but not limited to, those listed in the following table.

Resources Needed for Site Characterization, Remediation, and Reuse

Name of Resource	Is the Resource for (1.e.) Assessment, (1.f.) Remediation, or (1.g.) Reuse Activities?	Is the Resource Secured or Unsecured?	Additional Details or Information About the Resource
<i>VDEQ VBAF Assessment and Planning Grant</i>	1.e. Assessment	Unsecured	Up to \$50,000 available for additional assessment activities, if needed.
<i>VDEQ VBAF Site Remediation Grant</i>	1.f. Remediation	Unsecured	Up to \$500,000 available for additional remediation activities, if needed.
<i>Virginia Community Development Block Grant (CDBG)</i>	1.g. Reuse Activities	Unsecured	\$2,000,000 available for public infrastructure and \$250,000 for public services
<i>Virginia Department of Conservation and Recreation (DCR) Land and Water Conservation Fund</i>	1.g. Reuse Activities	Unsecured	Up to \$2,000,000 available for development of public outdoor areas
<i>Virginia DCR Recreational Trails Program (RTP)</i>	1.g. Reuse Activities	Unsecured	Up to \$50,000 to \$300,000 available for building and rehabilitating trails and trail related facilities.

1.h. Use of Existing Infrastructure: The target property currently lacks on-site utility infrastructure, with no existing water, sewer, or electrical service connections and no operational buildings. However, the site is well-positioned for redevelopment due to its immediate proximity to key municipal infrastructure within the target area. A major wastewater line runs along the northern boundary, and the Town of Pearisburg's main water line runs from the adjoining Well 4 to the Bluff City pump station, passing adjacent to the target property. Power utilities are also present along the Norfolk Southern boundary to the south. The Town's 0.275 million gallon per day (MGD) wastewater treatment plant is located directly next to the property, with available capacity for the proposed development. Additionally, the Town of Pearisburg and target property itself are located along U.S. Highway 460, and within roughly 30-40 minutes of both Interstates 77 and 81. This interstate connectivity strengthens the target property's ability to capitalize on the region's existing recreational economy, as thousands of travelers annually use these corridors to access the New River Water Trail, Appalachian Trail, and other established outdoor amenities. Cleanup and redevelopment will allow the target property to leverage this existing transportation infrastructure to capture pass-through visitation and support new recreation-oriented businesses without requiring any new external roadway construction or major transportation investments.

To support the target property's reuse, new infrastructure will be required, including internal roadways, grading, utility extensions (water, sewer, electric), and stormwater management features such as bioswales. All new developments are planned outside the 100-year floodplain to maximize resilience. The ready availability of adjacent municipal utilities significantly reduces the cost and complexity of extending services to the site, making this location highly suitable for redevelopment. Funding for these infrastructure upgrades will be sought through combination of state grant programs, County capital improvement projects, and potential public-private partnerships as the redevelopment advances.

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT:

Community Need

2.a. The Community's Need for Funding: The Town of Pearisburg (Target Area Census Tract 51071930300), as well as Giles County, faces significant barriers to funding environmental remediation and redevelopment, due to its **small population** base and limited economic capacity. With a tax base consisting of small, **low-income** populations, the County struggles to provide basic services and does not have access to resources needed to address brownfields. Giles County's population has remained relatively flat for decades, declining slightly from 16,657 in 2000 to 16,610 in the latest Census estimates. Pearisburg has seen a similar trend, dropping from approximately 5,700 residents in 2000 to 5,316 today. This long-term stagnation reflects rural outmigration and an aging population, limiting the local tax base and private investment potential.

Demographic and economic indicators underscore these constraints. Median household income in Giles County is \$64,819, well below the Virginia median of

Demographic Data ²	Target Area	Giles County	Virginia
Total Population	5,316	16,610	8,657,499
% Children (0-17)	21.0%	19.85%	23.33%
% Elderly (65 and over)	23.0%	22.03%	16.29%
% College Diploma	15.4%	18.0%	39.6%
Median Household Income	\$62,765	\$64,819	\$90,974
Per Capita Income	\$33,437	\$33,792	\$49,217
% Below Poverty Threshold	11.8%	8.9%	9.9%
Median House Value	\$118,600	\$143,500	\$360,700

² American Community Survey (ACS) 2023 5-year estimates.

\$90,974, and per capita income is \$33,792 compared to \$49,217 statewide. In Pearisburg's census tract, the poverty rate is 11.8%, higher than 9.9% statewide, and only 15.4% of residents hold a bachelor's degree or higher, compared to 39.6% statewide. The population is also older than the state average, with 23% of Pearisburg's residents aged 65 or over, versus just 16% statewide. These factors collectively limit the community's ability to leverage other funding sources for complex projects like environmental cleanup and site reuse. These long-standing demographic and fiscal constraints not only limit the County's ability to pursue brownfield cleanup independently but also restrict access to economic opportunities that could improve community wellbeing. Redeveloping the target property would help reverse these trends by creating new public amenities, attracting visitors, and opening space for small businesses tied to outdoor recreation. The resulting increase in activity, property values, and local tax revenue would generate long-term benefits that are otherwise unattainable without outside support.

2.b. Health or Welfare of Sensitive Populations: The Virginia Department of Health has developed a Health Opportunity Index (HOI) which is a group of indicators that provide broad insight into the overall opportunity Virginians have to live long and healthy lives, based on Social Determinants of Health (SDOH). The HOI consists of over 40 variables, combined into 14 indices, and aggregated into a composite HOI Score/Index. This provides a baseline for a community to determine what factors lead to positive health outcomes and healthy communities and identifies areas and populations that are more vulnerable to adverse health outcomes based on SDOH. Target Area Census Tract 51071930300 has a composite HOI of 0.609, indicating Moderate Opportunity for residents to achieve good health. Notably, 6 out of 12 tracked health conditions, including arthritis, cancer, coronary heart disease, chronic obstructive pulmonary disease (COPD), high cholesterol, and stroke, are present at their worst levels (top 20%) in this tract. The HOI analysis further reveals that economic factors, particularly low labor force participation, are major contributors to these health challenges.

As the previous table shows, the Target Area has a higher percentage of elderly residents and a higher percentage living below the poverty threshold, as compared to the county and state. The Target Area also has lower per capita and median household incomes, and is home to an aging, low-income population with less educational attainment, as many younger, college-educated individuals have left the area in search of better employment opportunities. These sensitive populations (elderly, low income, and individuals with high health burden) are especially susceptible to impacts from the environmental contaminants identified on the target property. By addressing contamination and enabling safe recreational and economic reuse of the site, this grant will directly benefit sensitive populations. This project will reduce potential exposure to hazardous substances, improve environmental quality, and provide new opportunities for physical activity, social connection, and economic participation; factors that are especially important for the Target Area's sensitive population.

2.c. Greater Than Normal Incidence of Disease & Adverse Health Conditions: Whether attributable to working in former industries, an aging population, environmental pollutants, transgenerational stresses, or a lower quality of life, health indicators show that the Target Area suffers from significantly higher cancer incidence rates than do residents of both Virginia and the U.S. overall. (See table – only County level health data is available.) For example, the rate for all cancer sites in Giles County is 500.1 cases per 100,000, compared to 411.2 for Virginia and 444.4 for the nation. Notably, Giles County's rates for bladder cancer (30.3 vs. 17.3 for Virginia), lung and bronchus cancer (79.0 vs. 51.3), and cancers of the oral cavity and pharynx (20.6 vs. 11.7) are substantially higher than state and national averages. Additionally, the Virginia Department of Health also reports a higher rate of birth defects in Giles County – 62.8 per 10,000 live births compared to Virginia at 55.2.⁴ These patterns are consistent with the types of health impacts expected from long-term exposure to the contaminants historically present at the target property.

Age-Adjusted Incidence Rate cases per 100,000 ³	Giles County	Virginia	U.S.
All Cancer Sites	500.1	411.2	444.4
Bladder	30.3	17.3	18.8
Lung & Bronchus	79.0	51.3	53.1
Oral Cavity & Pharynx	20.6	11.7	12.0
Uterus (Female)	65.0	26.0	27.8

Analytical results confirm that concentrations of arsenic, hexavalent chromium, and PAHs in site media exceed VDEQ risk-based criteria. These substances are well-established carcinogens, with arsenic and PAHs linked to increased risks of bladder and lung cancer, and hexavalent chromium associated with lung and oral cavity cancers; moreover, all site contaminants are also associated with developmental toxicants associated with heightened risks of birth defects⁵. The reuse strategy will help identify and reduce related health threats by remediating legacy contamination and transforming a blighted property into a community asset, thereby

³ National Cancer Institute. <https://statecancerprofiles.cancer.gov/index.html>. Accessed December 2025.

⁴ Virginia Department of Health. <https://www.vdh.virginia.gov/environmental-public-health-tracking/birth-defects/birth-defects-dashboard/>. Accessed December 2025.

⁵ EPA Integrated Risk Formation System. <https://www.epa.gov/iris>. Accessed December 2025.

supporting long-term health and welfare improvements for the area’s most vulnerable residents. Remediation and safe redevelopment of the target property are critical steps to reduce ongoing exposure risks and improve long-term health outcomes for sensitive populations in the Target Area.

2.d. Economically Impoverished/Disproportionately Impacted Populations: The Target Area is recognized as economically impoverished and disproportionately impacted by environmental burdens. As demonstrated in previous sections, the area’s median household and per capita incomes are well below the Virginia averages, and the poverty rate in the target census tract exceeds 11%. According to the Virginia HOI, Census Tract 51071930300 is classified as “Moderate Opportunity,” with economic vulnerability driven by low labor force participation and high rates of chronic disease. Additionally, contamination identified at the target property is known to be associated with increased risks of cancer, respiratory disease, and cardiovascular conditions. Notably, Giles County’s cancer incidence rates are significantly higher than state and national averages. The HOI analysis further reveals that six out of twelve tracked health conditions, including cancer and heart disease, are at their worst levels in this tract.

The populations most affected by these threats are the elderly, low income, and individuals with high health burden; groups that are less able to relocate or access alternative resources and are more susceptible to the health impacts of environmental contamination. The area’s limited fiscal capacity, as demonstrated by both county and town budgets, further restricts the ability to address these issues without external support. The proposed redevelopment addresses the community’s needs by transforming a long-blighted property into a regional recreational hub, creating new economic opportunities in a county where manufacturing (24%) and health care (15%) dominate employment and tourism-related sectors are growing but remain underdeveloped. By introducing sports fields, river access, and trail connectivity, the project will attract visitors, stimulate outdoor recreation-oriented businesses, and diversify the local economy—critical steps for a rural community with limited fiscal capacity and few alternative funding streams.

Community Engagement

2.e. Project Involvement & 2.f. Project Roles:

Name of Organization / Entity / Group Point of Contact (name, phone & email)	Specific involvement in the project or assistance provided
Giles County Office of Tourism and Marketing Cora Gnegy (540-921-2079) cgnegy@gilescounty.org	Manage destination branding, visitor outreach, event promotion, and strategic area wide partnerships. They will integrate the site into county branding and visitor outreach and support event programming to drive economic impact.
Giles County Recreation Development Committee Amanda Cox (276-627-1211) accox@aep.com	Make recommendations to the full Council on parks, recreation and public buildings and facilities. They will assist with prioritizing site improvements and support long-term stewardship of the redeveloped property.
Giles County Trail Club Teresa Fletcher (██████████)	Volunteer group focused on trail maintenance, group hikes, recreation advocacy, and trailhead informational materials in Giles County. The club will assist with cleanup decisions, community outreach, promotion of the redevelopment, and gather resident feedback for trail connectivity.
VDEQ Karen Weber (804-732-7790) karen.weber@deq.virginia.gov	State environmental program overseeing the target property’s progression through the VRP. Will ensure the cleanup achieves a satisfactory level of human health and environmental protection and issue the County a Certification of Satisfactory Completion of Remediation for the site once cleanup is completed.
New River Valley Regional Commission Kevin Byrd (540-639-9313 x212) kbyrd@nrvc.org	Provides regional planning expertise and supports coordination among local governments. Will help ensure the project aligns with broader regional development and infrastructure goals.
Giles County Rotary Club Mikhail Mann (██████████)	Engages in community service and outreach, mobilizes volunteers for project events, and will help promote the project’s benefits to local residents and leaders.
Pearisburg Merchants Association Samantha McCroskey (540-922-9150) (██████████)	Represents local businesses and works to promote economic vitality in the downtown and surrounding areas. The association can provide input on how site redevelopment can support local commerce, participate in decision-making for future business opportunities, and help market the site as a community asset.

2.g. Incorporating Community Input: The County held a community meeting on January 7, 2026, to share our plan to apply for an EPA Brownfields Grant to pursue the intended redevelopment and reuse of the target property. The County will continue engagement by hosting at least two community meetings before the cleanup begins, and at least one meeting when cleanup is complete. As may be required, these advertised public meetings will be conducted during evening hours to encourage participation by the entire community. With a focus on residents and business owners potentially affected by the project, these meetings will include project updates by community group members, project staff and consultants about project status, and will provide an open forum for engagement and education. An online option will be offered for those unable to attend in-

person. Accommodations will be made if and when non-English speaking communities are identified in the project area, and meetings will be held at facilities with ADA accommodations. With a large elderly and poor population, easily accessible, low-tech communication methods will be most effective. Therefore, in addition to social media and website updates, the County will distribute information via various means, potentially including local church bulletins, newspaper press releases, brochures/flyers, and presentations to community and civic groups to communicate progress, where appropriate. The County will maintain meeting sign-in sheets for follow-up communication, and all comments received will be documented, carefully considered, and a response will be provided in a timely manner. The County will also establish an information repository both online and at the Giles County Administration office to house all project documentation for residents and stakeholders to access, as needed.

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

3.a. Proposed Cleanup Plan: This project aims to protect human health and the environment while redeveloping the approximately 32.6-acre target property into a recreational hub that will better serve the community and local region. To adequately prepare the target property for redevelopment, Alternative 4: Removal and Off-Site Disposal, was chosen from the ABCA for its effectiveness in permanently eliminating exposure pathways and supporting unrestricted site reuse. The cleanup will involve the complete removal and off-site disposal of all soils, vat materials, vat water, and associated debris where contamination and risk have been identified at the target property. As discussed in Section 1.b., soil sampling revealed arsenic (up to 79.5 mg/kg) and hexavalent chromium (up to 140 mg/kg) exceeding VDEQ VRP Tier III criteria, along with PAHs contributing to carcinogenic risk. Additionally, cyanide was detected in vat water up to 12.5 µg/L, exceeding Tier II and Tier III criteria. Targeted excavation will remove approximately 21,500 cubic yards of impacted soils and vat materials from the site, as well as all identified vats with contamination. Approximately 9,500 gallons of contaminated vat water will be pumped, containerized, and transported off-site for disposal at a permitted facility. During cleanup, excavations will be segregated and managed based on contamination status, with impacted materials to be disposed of at a Subtitle D municipal solid waste landfill, and non-contaminated material, such as concrete and wood, to be disposed of at a construction and demolition (C&D) landfill. Excavated areas will be backfilled with clean imported fill, compacted to meet geotechnical standards, and graded to restore site contours and support future redevelopment. Disturbed areas will be stabilized with vegetation and erosion controls. Dust suppression and sediment controls will be implemented throughout the project. Confirmation sampling will be performed following excavation to verify that all remedial objectives have been met and that no residual contamination remains above applicable standards. All work will be overseen by qualified environmental professionals and conducted in accordance with VDEQ VRP requirements, ensuring regulatory compliance and enabling safe, unrestricted site reuse and redevelopment.

Description of Tasks/Activities & Outputs:

3.b. Project Implementation, 3.c. Anticipated Project Schedule, 3.d. Task Lead, & 3.e. Outputs:

Task 1: Project Management
3.b. Project Implementation: The County Project Manager will oversee the grant management and compliance with EPA grant terms and conditions. This includes EPA Reporting (ACRES, FFRs, Quarterly Reports, and Close Out); competitively procuring and managing qualified environmental professional (QEP) and remediation contractors; conducting financial reporting and drawdowns; meeting monthly with the QEP and project team; establishing an information repository; maintaining project files; coordinating with stakeholders; ensuring program remains on schedule and budget; and traveling to and attending national and VDEQ brownfield conferences. At the end of the project, with assistance from the QEP, the Project Manager will draft a Final Performance Report to document accomplishments and lessons learned. The County will perform Cooperative Agreement (CA) oversight activities as leveraged services (in the form of staff time/salary, materials) for any activities not budgeted as part of this task.
3.c. Anticipated Project Schedule: Tasks will be completed over the four (4) year grant performance period. The County anticipates: Completing the procurement of a QEP by <i>December 31, 2026</i> ; Kick off program <i>January 2027</i> ; Monthly project team mtgs; Quarterly reports submitted within 30 days of end of each quarter (Jan/April/July/Oct); and FRR reports annually by Oct. 30 of each grant year. ACRES will be updated upon grant award and at regular intervals as project cleanup and redevelopment milestones are achieved and/or new information available. Final closeout report will be submitted within 90-days after the end of the cooperative agreement performance period.
3.d. Task/Activity Lead: County Project Manager with the assistance of the future QEP.

<p>3.e. Outputs: 48 Project Team Meetings; 16 Quarterly Reports; 4 FFR forms; regular ACRES updates; 1 Final Performance Report.</p>
<p>Task 2: Community Outreach & Engagement</p>
<p>3.b. Project Implementation: The County will conduct extensive outreach and communication with Target Area residents and community stakeholders throughout project implementation. Specific tasks include conducting stakeholder meetings at key milestones of the project, distributing project information to the community, establishing an information repository available for review by the public, and preparing and distributing outreach materials as necessary.</p>
<p>3.c. Anticipated Project Schedule: Outreach activities anticipated to commence in <i>Spring 2027</i> and occur over the following three (3) years throughout project implementation, until cleanup related field work is completed, estimated to be <i>Spring 2030</i>. Outreach anticipated to be conducted at the following project milestones: 1) <i>Spring 2027</i>: Establishment of data repository; 2) <i>Winter / Spring 2028</i>: Pre-cleanup and to solicit feedback on cleanup plan; and 3) <i>Winter / Spring 2030</i>: Post cleanup.</p>
<p>3.d. Task/Activity Lead: County Project Manager will lead community engagement activities. QEP will be the County's partner and provide technical expertise and support at meetings. The County will review deliverables to ensure compliance with state/federal programmatic requirements.</p>
<p>3.e. Outputs: Outreach materials, website updates, public notices, meeting presentation materials, social media posts. Three (3) public meetings held at key project milestones to share information, schedules, and solicit feedback.</p>
<p>Task 3: Site Specific Cleanup Activities</p>
<p>3.b. Project Implementation: QEP will prepare documentation required for cleanup implementation, including a Health and Safety Plan (HASP), Quality Assurance Project Plan (QAPP), Remediation / Engineering Plans & Specifications, and EPA and VDEQ VRP required documents, and Remedial Action Plan. The County will prepare a public bid package with support from QEP for the procurement of a cleanup contractor. QEP will provide bid support to the County during competitive procurement process. Cleanup contractor will implement cleanup tasks with oversight from QEP in accordance with the ABCA and Remedial Action Plan.</p>
<p>3.c. Anticipated Project Schedule: <i>Summer 2028 to Winter 2028-2029</i>: Finalize the Remedial Action Plan and issue invitation for bids for cleanup contractor. <i>Winter 2028 to Spring 2028</i>: award cleanup contractor and secure necessary permits. <i>Spring/Summer 2028</i>: Commence site remediation. <i>Summer/Fall 2029</i>: Complete site remediation related field tasks.</p>
<p>3.d. Task/Activity Lead: QEP with oversight from County Project Manager</p>
<p>3.e. Outputs: HASP, QAPP, EPA & VDEQ VRP report(s), remedial engineering plans & specifications, bid documents, site remediation & restoration. Removal of 21,500 CYD of impacted soil and vat material and approximately 9,500-gallons of vat water; risks to reuse mitigated.</p>
<p>Task 4: Site Cleanup Oversight and Cleanup/Completion Reports</p>
<p>3.b. Project Implementation: During site remediation, the QEP will oversee and document activities in the field to ensure cleanup is performed in compliance with the EPA approved ABCA and VDEQ VRP requirements. The QEP will collect confirmation soil sampling following soil removal activities, as well as prepare and submit the VRP Remedial Action Plan and Demonstration of Completion documents to the VDEQ and EPA. In coordination with VDEQ, the project will be issued a Certificate of Satisfactory Completion of Remediation through the VRP.</p>
<p>3.c. Anticipated Project Schedule: Site cleanup oversight and related activities are expected to occur <i>Spring/Summer 2028 to Summer/Fall 2029</i>. Final documentation and Demonstration of Completion anticipated in <i>Spring 2030</i>.</p>
<p>3.d. Task/Activity Lead: QEP will provide technical oversight, conduct confirmation sampling, and document remedial activities for compliance with applicable VDEQ/EPA standards and requirements. The County Project Manager will review deliverables to ensure compliance with state/federal regulatory and programmatic requirements.</p>
<p>3.e. Outputs: Remedial Action Plan, Demonstration of Completion, and Certification of Satisfactory Completion of Remediation. Site ready for reuse that does not pose a threat to human health or the environment completed within 4 years.</p>
<p>3.f. Cost Estimates: Giles County is requesting \$3,693,800 to complete the tasks above. Costs have been estimated based upon past experiences, estimates from environmental contractors and in consultation with the EPA's Interim General Budget Development Guidance for EPA Applicants and Recipients. <i>Please note that no</i></p>

personnel, fringe, indirect or supply costs are requested.

Task 1 – Project Management

- Travel:** 1 County staff to attend 4 regional/grantees workshops (1x4x\$500/person/trip = \$2,000 total) and 2 national conferences (1x2x(\$750 airfare / transportation + 3 hotel nights @\$200/night totaling \$600 + \$150 in meals = \$1,500/person/trip) = \$3,000 total) = **\$5,000**
- Other:** Registrations fees for 1 County staff to attend 4 regional/grantees workshops (1x4x\$200 = \$800) and 2 national conferences (1x2x\$350 = \$1,050) = **\$1,500**
- Contractual:** 48 project team meetings (48x\$400 = \$19,200); 1 final summary report (\$5,000); quarterly reports and ACRES updates (16x\$500 = \$8,000) = **\$32,200**

Task 2 – Community Outreach and Engagement

- Contractual:** QEP to attend 3 public meetings (3x\$3,000) = **\$9,000**

Task 3 – Site Specific Cleanup Activities

- Contractual:** QEP costs associated with QAPP (\$3,500), HASP (\$1,500), Permitting/Engineering and Planning (120 hours x \$250/hour = \$30,000), and public bidding assistance (80 hours x \$150/hour = \$12,000) = **\$47,000**
- Construction:** Remediation Contractor costs associated with removal of vegetation and site preparation (\$50,000), pumping and offsite disposal of vat water (\$8,500), excavation and disposal of impacted materials to offsite location (21,500 CYD x \$105/CYD = \$2,257,500); backfill and grade with clean fill and topsoil (21,500 CYDx\$25/CYD = \$537,500); days of construction (est. 20 days x \$15,000/day = \$300,000); 10% contingency cost (10% of construction costs = \$315,350) = **\$3,468,850**

Task 4 – Site Cleanup Oversight and Cleanup/Completion Reports

- Contractual:** VDEQ VRP Application costs (Enrollment Fee (\$2,000) + Registration Fee (\$7,500) + Annual Fees (\$4,500/year x 3 years = \$7,500) = \$23,000); confirmation sampling (est. lab + labor = \$20,000); QEP cost for Remedial Action Plan and Demonstration of Completion documents (\$15,000); QEP costs associated with technical oversight (250 hours x \$185/hour = \$46,250) and daily onsite oversight of remediation contractor (est. 20 days x 10 hours/day x \$130/hour = \$26,000) = **\$130,250**

Budget Categories	Task 1	Task 2	Task 3	Task 4	Totals
	Project Management	Community Engagement	Site Specific Cleanup Activities	Cleanup Oversight & Report	
Travel	\$5,000	\$0	\$0	\$0	\$5,000
Other	\$1,500	\$0	\$0	\$0	\$1,500
Contractual	\$32,200	\$9,000	\$47,000	\$130,250	\$218,450
Construction	\$0	\$0	\$3,468,850	\$0	\$3,468,850
Total	\$38,700	\$9,000	\$3,515,850	\$130,250	\$3,693,800

3.g. Plan to Measure and Evaluate Environmental Progress and Results: The project team will meet monthly 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 in accordance with the approved ABCA and well within the four-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 ensure that all reporting requirements are being met in a timely manner 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 ACRES. Progress in environmental investigation and cleanup will also be tracked through enrollment and advancement in the VDEQ’s VRP. Key milestones, such as remedy implementation, confirmation sampling, and ultimately the issuance of a Certificate of Satisfactory Completion of Remediation, will serve as objective measures of environmental progress and project success. At a minimum, the outputs to be tracked include public meetings, final ABCA, remedial action plan, and certificate of completion; and, the outcomes to be tracked include community participation, acres ready for reuse, redevelopment dollars leveraged, and jobs created.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE:

Programmatic Capability

4.a. Organizational Structure & 4.b. Description of Key Staff: Mr. John Hale, Special Projects Manager for Giles County, will serve as the point of contact and project manager for this grant. Mr. Hale reports to Mr. Chris

McKlarney, the County Administrator, who in turn reports to the Giles County Board of Supervisors. The Giles County Board of Supervisors, headed by Chair Jeffrey Morris, serves as the governing body for the County and provides policy direction and final approval for major initiatives, including grant activities. This structure ensures that all grant activities are aligned with the Board's priorities and receive appropriate oversight. Mr. Hale has been intimately involved with the County for over 2 years, with over 25 years of special project management experience during his working career. Through his experience and daily interactions with County and Town residents, he has fostered a unique understanding of the needs of the community which will be an asset to ensure the grant's success. Mr. Hale's responsibilities include pursuit of funding opportunities for public infrastructure and business development initiatives on behalf of citizens in the County. Mr. Hale will be supported by fellow special project manager Mr. Jeff Dinger, who has over 20 years of experience with the County. Mr. Dinger will serve as interim or replacement project manager in the event of project manager loss or re-assignment. With their support, the County has administered various grants, including funding through the U.S. and Virginia Department of Transportation (USDOT and VDOT), Federal Railroad Administration (FRA), and U.S. Department of Agriculture (USDA) Rural Development. Both Mr. Hale and Mr. Dinger will be assisted by Ms. Missy Bray, Executive Assistant, who has been with the County for over 12 years. Her understanding of the County's financials, along with her strong knowledge of this small, rural community will provide valuable insight into the use of cleanup funds. This team's combined experience will ensure correct and timely reporting, compliance, and grant completion within the 4-year window.

4.c. Acquiring Additional Resources: The County's grant administrators have extensive experience managing grant funds and thus will begin the QEP procurement process immediately following the Work Plan and Cooperative Agreement approval with the EPA. We will secure these services through a competitive process in accordance with 2 CFR 200 and Giles County's purchasing policies. Following receipt of proposals, the County will review each application to select the most qualified and cost-effective firm. Once the cleanup plan is finalized, the County will again issue a competitive solicitation for a remediation contractor to implement the remedial action plan. The County again will review the proposals to select the most cost-effective, qualified contractor. We will document all steps of the procurement and evaluation process to ensure compliance.

Past Performance & Accomplishments

4.e. Has Not Received an EPA Brownfields Grant but Has Received Other Agreements:

4.e.(1) Purpose & Accomplishments: Giles County was awarded \$4.8 million from **USDA Rural Development** for the Route 460 Sewer Project, which expanded and modernized sewer service along the Route 460 corridor. The project included installation of 53,870 feet of sewer line, 150 manholes, and three pump stations, acquisition of 40 easements, and coordination with multiple agencies. Key accomplishments included improved public health, enhanced environmental quality, and increased capacity for future development, with the project completed under budget and remaining funds allocated for long-term maintenance. The County also completed the \$897,000 Route 673 Bridge Replacement over Wolf Creek, funded by **VDOT and the Federal Highway Administration**, replacing a 1924 bridge and improving transportation safety. Currently, Giles County is implementing a \$304,000 **USDOT/FRA** Railroad Crossing Improvements project, focusing on safety upgrades at four highway grade-rail crossings. These projects demonstrate the County's capacity for managing complex infrastructure grants, coordinating with multiple stakeholders, and achieving measurable outputs and outcomes similar in scope and structure to the proposed Brownfields project.

4.e.(2) Compliance with Grant Requirements: The County has consistently demonstrated full compliance with the workplans, schedules, and terms and conditions of its recent assistance agreements, including those funded by USDA Rural Development, VDOT, and USDOT/Federal Railroad Administration. For each project, County staff closely monitored progress toward program goals, milestones, and intended outputs and outcomes, ensuring that activities remained on track and within the established periods of performance. All required reports and financial documentation were submitted in a timely and acceptable manner, and applicable grants were closed as detailed above. Progress toward achieving expected results was made and reported on regularly, with no corrective measures required to date. This track record reflects the County's commitment to transparency, accountability, and effective project management, and demonstrates its capacity to deliver successful outcomes in accordance with funder requirements.

Threshold Criteria for Cleanup Grants

1. APPLICANT ELIGIBILITY:

(a) The County of Giles, Virginia is a “General Purpose Unit of Local Government” as defined in 2 CFR 200.64 and, therefore, eligible to receive EPA Brownfields Assessment Grant funding.

(b) The County of Giles, Virginia is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. PREVIOUSLY AWARDED CLEANUP GRANTS:

The County of Giles, Virginia affirms that the proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. EXPENDITURE OF EXISTING MULTIPURPOSE GRANT FUNDS:

The County of Giles, Virginia does not have an open EPA Brownfields Multipurpose Grant.

4. SITE OWNERSHIP:

The Former Leas & McVitty / New River Tannery (the “site”) is owned by the County of Giles, Virginia. The site, which consists of 32.6-acres, was acquired by the County of Giles, Virginia on December 16, 2025.

5. BASIC SITE INFORMATION:

a) the name of the site is: **Former Leas & McVitty / New River Tannery**

b) the address of the site is: **Tannery Road, Pearisburg, Giles County, Virginia 24134 (centered at approximately 37.341696, -80.752079)**

6. STATUS AND HISTORY OF CONTAMINATION AT THE SITE:

a) whether this site is contaminated by hazardous substances or petroleum: The Former Leas & McVitty / New River Tannery is impacted by hazardous substances as further detailed in item c of this section.

b) the operational history and current use(s) of the site: The site was originally established as a “Leas & McVitty” (L&M) tannery, later known locally in Pearisburg as the “New River Tannery,” in 1894. Operations phased out at the New River Tannery in the late 1960s, and by 1972, wooden structures and other buildings at the site were reportedly burned as part of the demolition process. The site contains several remnants from historic tannery operations, including a dilapidated water tower, relic industrial structures (concrete foundations, railroad spurs, and vats), and concrete used to fill/cover historical vats. In-ground concrete and wooden vats are either completely or partially filled with rubble, soil, and water. Two large agricultural fields are currently present within the Site, one near the northwestern corner and one that occupies the eastern area of the site. Aside

Threshold Criteria for Cleanup Grants

from the fields, dense vegetation is present across the Site, which is unoccupied and with no current operations.

c) environmental concerns, if known, at the site: Historic tannery operations at the site included the storage and use of tanning agents and hide preservatives in former lagoons, basins and vats, as well as other general industrial maintenance activities. The Contaminants of Concern (COCs) detected at the site include arsenic, hexavalent chromium, cyanide, and polycyclic aromatic hydrocarbons (PAHs).

d) how the site became contaminated, and to the extent possible, describe the nature and extent of the contamination: As noted above, sources of contamination at the site are associated with its former operation as a tannery, with likely sources including tanning agents and hide preservatives; the breakdown of organic materials in former lagoons, basins and vats; and, other general industrial maintenance activities. Contaminants may have been released from former vats, spilled on the ground surface, and/or leaked through containment features to be released in surficial and subsurface soil.

Previous assessments at the site included sampling and analysis of soil and vat materials at the site. Shallow groundwater within 25 feet has not been encountered at the Site, and no impacts have been identified in the deeper aquifer system, which is utilized by the adjoining municipal water well (PWS VA1071455, Giles County Well No. 4). Analytical results and risk assessment evaluation have indicated that concentrations of arsenic, hexavalent chromium, cyanide, and PAHs in soil, vat soil, and/or vat water present on the site are above applicable Virginia Department of Environmental Quality (VDEQ) Voluntary Remediation (VRP) risk-based performance criteria for the intended redevelopment. Impacts appear to be largely isolated within Areas of Concern (AOC) at the site, which are further described within the narrative of this application.

7. BROWNFIELDS SITE DEFINITION:

The site meets the definition of a brownfield under CERCLA 101(39). It is real property where the redevelopment and reuse are complicated by the presence of hazardous substances. The County of Giles, Virginia, affirms that the site is:

- a) not listed or proposed for listing on the National Priorities List (NPL);
- b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issues to or entered into by parties under CERCLA; and
- c) not subject to jurisdiction, custody, or control of the U.S. government.

8. ENVIRONMENTAL ASSESSMENT REQUIRED FOR CLEANUP GRANT APPLICATIONS:

The following reports, including an ASTM International (ASTM) Phase II Environmental Site Assessment (ESA) equivalent environmental site assessment report, have been completed:

- Preliminary Engineering Report and Environmental Audit, June 1992
- Phase I ESA, June 2023
- Phase II ESA, August 2025

Threshold Criteria for Cleanup Grants

- Risk Assessment Report, September 2025
- Updated Phase I ESA, September 2025
- Analysis of Brownfields Cleanup Alternatives (ABCA), December 2025

9. SITE CHARACTERIZATION:

b) A letter dated January 22, 2026, from the State Environmental Authority (VDEQ), has been attached affirming the following:

- i. The County of Giles, Virginia will request State oversight for the site.
- ii. The site is eligible to be overseen by the State program.
- iii. Based upon the environmental site assessments performed to date and information provided by the applicant, the site has had a sufficient level of site characterization for the remediation work to begin.

10. ENFORCEMENT OR OTHER ACTIONS:

There are no known ongoing or anticipated environmental enforcement or other actions related to the site.

11. SITES REQUIRING A PROPERTY-SPECIFIC DETERMINATION:

The Site does not meet any of the criteria of special classes that require a “Property-Specific Determination” from EPA to be eligible for grant funding.

12. 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

The County of Giles, Virginia is not potentially liable for contamination at the site under CERCLA §107. The County of Giles, Virginia acquired the site on December 16, 2025, after performing an AAI compliant Phase I ESA dated September 30, 2025. The County of Giles, Virginia meets the definition of a Bona Fide Prospective Purchaser for the Site. The County of Giles, Virginia did not own or operate the facility at the time of disposal of a hazardous substance, has never arranged for the treatment or disposal of hazardous substances at the site, nor has accepted hazardous substances for transport for disposal or treatment at the site. The County of Giles, Virginia has limited the potential for exposure by only allowing access to potentially hazardous areas to qualified professionals.

(a) Information on the Property Acquisition

- i. The County of Giles, Virginia acquired the property through a negotiated purchase from a private entity (Sun River Properties, LLC), formalized by a general warranty deed.
- ii. Date of acquisition: December 16, 2025.
- iii. The County of Giles, Virginia holds fee simple title to the property. No other entities own the site.

Threshold Criteria for Cleanup Grants

- iv. The site was acquired from Sun River Properties, LLC.
- v. The County of Giles, Virginia has no familial, contractual, or financial relationships or affiliations with prior owners, operators, or other potential responsible parties.

(b) Pre-Purchase Inquiry

- i. An AAI compliant (ASTM 1527-21) Phase I ESA, dated September 30, 2025, was performed for the VDEQ under their EPA Brownfields funding. The County of Giles, Virginia was also provided reliance upon this report.
- ii. The AAI compliant (ASTM 1527-21) was performed by an Environmental Professional as defined in 40 CFR § 312.10, and the required declaration by the environmental professional is included in the written report.
- iii. The AAI compliant (ASTM 1527-21) Phase I ESA was completed within 180 days prior to the date of acquisition.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal

The County of Giles, Virginia is not responsible for the current state of the site or the presence of hazardous substances. The County of Giles, Virginia also affirms that at no time have we arranged for the disposal of hazardous substances on the site or transported hazardous substances to the site.

(d) Post-Acquisition Uses

There are no current uses of the site, which has been vacant since acquisition.

(e) Continuing Obligations

- i. No on-going releases of hazardous substances were discovered on the site.
- ii. The County of Giles, Virginia took all reasonable steps to prevent any future releases by prohibiting activities in contaminated areas of the site.
- iii. In order to prevent and/or limit exposure to remaining potential contaminants, the County of Giles, Virginia has taken measures to prevent access to the site except by qualified personnel. The general public does not have access to the site.

The County of Giles, Virginia affirms we are:

- i. Complying with any land use restrictions and not impeding the effectiveness or integrity of any institutional controls;
- ii. Assisting and cooperating with those performing the cleanup and providing access to the property;
- iii. Complying with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
- iv. Proving all legally required notices.

Threshold Criteria for Cleanup Grants

13. CLEANUP AUTHORITY AND OVERSIGHT STRUCTURE:

- a. To ensure adequate oversight of the cleanup, the site will be enrolled in the VDEQ's VRP.
- b. The site is adjoined by Norfolk Southern railroad to the south, the New River to the north and east, and the Pearisburg Sewage Treatment Plant and municipal water supply well (PWS VA1071455, Giles County Well No. 4) to the west. During cleanup activities, the County of Giles, Virginia will monitor the property boundaries in order to ensure no off-site migration of potential contaminants.

14. COMMUNITY NOTIFICATION:

The County of Giles, Virginia, published a notice of intent to apply for an EPA Brownfields Cleanup Grant, including a notice of a public meeting, and request for comments on the draft application and ABCA, on December 17 and 24, 2025. The notice was posted in the local *Virginian Leader* newspaper. The request for comments, draft ABCA, draft narrative, and other supporting documentation were made available for review at the Giles County Administrative Offices located at 1 Taylor Avenue, Suite 2, Pearisburg, Virginia.

Details about the site, draft application, and ABCA were presented during the public Giles County Board of Supervisors meeting on Wednesday January 7, 2026, at 3:00 pm.

Attached to the proposal are:

- A copy of the draft ABCA;
- A copy of the newspaper ad;
- Meeting notes/summary from the public meeting;
- A summary of the comments received;
- The County's responses to those public comments; and
- A meeting sign-in/participation list.

15. CONTRACTORS AND SUBRECIPIENTS:

- Contractors: Not applicable.
- Subrecipients: Not applicable.



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

www.deq.virginia.gov

David L. Bulova
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director

January 22, 2026

Chris McKlarney
Giles County Administrator
315 North Main Street
Pearisburg, VA 24134

VIA ELECTRONIC MAIL

Subject: Acknowledgement and VRP Eligibility – Giles County
FY2026 USEPA Brownfield Cleanup Grant
EPA-I-OLEM-OBLR-25-07

Dear Mr. McKlarney,

The Virginia Department of Environmental Quality (DEQ) acknowledges that Giles County, Virginia plans to conduct the cleanup of a brownfield site and is applying for an FY26 EPA Brownfields Cleanup Grant.

Giles County has developed an application requesting site-specific federal Brownfields Cleanup funding for the former Leas & McVitty Property also known as the New River Tannery site located on Tannery Road, Pearisburg, VA 24134. The site includes Parcel IDs 24-45 and 25-46. DEQ has been actively involved in the assessment and planning efforts related to this site. Building off of an environmental audit report from 1992, a Phase I ESA was completed under EPA's Targeted Brownfields Assessment (TBA) program and updated prior to the County's acquisition of the property. Using DEQ's Community-wide Assessment Grant for States and Tribes funding and supplemental 128(a) funding awarded to DEQ, a Phase II ESA, Risk Assessment, and Conceptual Site Planning was completed for the site. Based on data collected an Analysis of Brownfields Cleanup Alternatives (ABCA) was developed for the site.

Virginia DEQ affirms that:

- i. Giles County will request DEQ oversight for the site;
- ii. The site is eligible to be overseen by a DEQ's Voluntary Remediation Program (VRP); and


Acknowledgement and VRP Eligibility – Giles County
FY26 EPA Brownfield Cleanup Grant
EPA-I-OLEM-OBLR-25-07

- iii. Based upon the environmental site assessment performed to date and information provided by the applicant, the DEQ oversight program concurs that the site has had a sufficient level of site characterization for the remediation work to begin.

For any questions regarding this letter, please contact Karen Weber, P.G., Brownfields Coordinator at 804-432-7790.

Sincerely,

Weber Karen
zdm78982

 Digitally signed by: Weber Karen
zdm78982
DN: CN = Weber Karen zdm78982
OU = COV-Users, End-Users, DEQ
Date: 2026.01.23 09:01:39 -0500'

Karen Weber, P.G.
Brownfields Coordinator

cc: Cortney Marquette – DEQ-CO