



NITRO, WV APPLICATION INFORMATION SHEET

1. Applicant Identification: City of Nitro

2009 20th St. Nitro, WV 25143

2. Website URL: <https://cityofnitro.org/>

3. Funding Requested:

a. Grant Type: Single Site Cleanup

b. Federal Funds Requested: \$745,485

4. Location: City of Nitro, Kanawha County, West Virginia

5. Property Information: (Old) Nitro High School site, 302 21st St., Nitro, WV 25143

6. Contacts:

a. Project Director: Kim Reed

City Manager

2009 20th St. Nitro, WV 25143

304.755.0702 ext. 201 | k.reed@cityofnitro.org

b. Chief Executive: Mayor Dave Casebolt

City of Nitro

2009 20th St Nitro, WV 25143

304.755.0702 | dcasebolt@cityofnitro.org

7. Population: 6,200

8. Other Factors:

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

9. Releasing Copies of Applications: Not Applicable.

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields

a. Overview of Brownfields Challenges and Description of Target Area

Community and Historical Context

The City of Nitro, Kanawha and Putnam Counties, West Virginia, was founded by the United States government during World War I as a planned industrial community to support the manufacturing of nitrocellulose for explosives critical to the national war effort. The intensive chemical processes associated with nitrocellulose production shaped the City's early industrial footprint and land-use patterns, influences that continue to inform redevelopment challenges today. Nitro is part of West Virginia's "Chemical Valley," a colloquial name for the Kanawha River Valley, which, at its peak in the mid-20th century, was the world's largest chemical producer. For decades, Nitro's economy and identity were closely tied to the chemical and manufacturing industries, which provided stable employment and drove the construction of institutional, residential, and civic infrastructure throughout the city. Schools, municipal buildings, and community facilities were built to support a growing workforce and population.

Nitro experienced economic and population decline in the latter half of the 20th century as chemical production scaled back, facilities closed or modernized, and employment opportunities diminished. These shifts resulted in reduced population, aging infrastructure, and limited resources to maintain or repurpose large institutional properties. As a result, former schools, industrial buildings, and public facilities became increasingly difficult to adapt for modern use, contributing to vacancy and disinvestment in central neighborhoods.

Today, Nitro is a small but resilient community working to reposition itself through targeted reinvestment, downtown revitalization, recreational tourism, and neighborhood stabilization. The City continues to serve a population with modest household incomes and a higher-than-average share of older housing stock, factors that heighten sensitivity to blight, environmental hazards, and underutilized properties. Vacant institutional sites like the former Nitro High School present outsized challenges due to their scale, age, and the presence of hazardous building materials. These sites contribute to blight, depress property values, strain municipal services, and pose ongoing environmental and human health risks, particularly for already burdened populations. Additionally, they are emotional landmarks for many residents, representing disinvestment in Nitro's civic core and amplifying resident concerns related to safety, environmental conditions, and the message and the message they convey about the community. This layered history of educational, civic, and economic use has heightened the urgency for safe cleanup and strategic redevelopment, of these sites, positioning environmental remediation not only as a prerequisite for reuse, but as a critical step toward restoring community confidence and transforming a long-standing symbol of decline into a catalyst for revitalization.

b. Description of the Proposed Brownfield Site

The former NHS property is one of the City's most significant brownfield obstacles, located at 302 2nd Street, **adjacent to Nitro Elementary School, Nitro City Hall, Living Memorial Park, the Nitro Fire Department, and the Wars Museum**, amplifying its impact on daily community life and public perception. The original building was constructed in 1918 and served grades 1-12 until 1955, when all but the gymnasium was demolished and the existing building was constructed in its place. The school was home to generations of Nitro students until the new high school was built in

1991. The property is just over 2.5 acres, primarily taken up by the building. Following its closure as a high school, the building continued to function as a multi-use civic anchor under the ownership of the Nitro Development Authority and Kingsway Church. During this period, the site was adaptively reused to house a church, daycare facility, senior center, police station, municipal court, and a small business hub that provided affordable space for numerous local businesses. Today, the building is vacant and long-term roof leakage has caused structural damage. City personnel do their best to secure the building, but it is a frequent site of break-ins, causing additional damage and risking transferring contaminants inside the building to the surrounding area, including the elementary school next door.

A Phase 1 Environmental Site Assessment and asbestos inspection were conducted to investigate the former school's environmental condition. Asbestos-containing materials (ACM) commonly used in construction were found extensively throughout the building. Floor tiles and mastic, chalkboards, pipe insulation, window caulking, roofing on the gymnasium and cafeteria, and ceiling panels were all found to contain asbestos. In total, 89,365 square feet and 12,600 linear feet of ACM were inventoried in the building. Although most of this is non-friable, it will all need to be removed and disposed properly to prepare the building for demolition.

Revitalization of the Target Area

c. Reuse Strategy and Alignment with Revitalization Plans

The current structure on the subject property is planned to be demolished and redeveloped into new downtown commercial space. Nitro has undertaken long-term downtown revitalization efforts, as laid out in the City's 2013 Strategic Plan, "Nitro—A Plan for Moving the City Forward." A streetscaping project helped to beautify downtown and improve accessibility and walkability. Improvements to nearby Ridenour Lake, including expanded mountain bike trails, hope to drive downtown traffic. However, the former NHS building is the gateway between Ridenour Lake and the commercial district, presenting an unwelcoming and unsafe connection that deters many visitors to the lake from heading downtown. Creating commercial space that appeals to lake-goers, such as bike or kayak rentals and restaurants, will be a critical step in Nitro's downtown revitalization project. The property is not within the federally designated floodplain.

d. Outcomes and Benefits of Reuse Strategy

Building new commercial space on the site of the former Nitro High School will create significant economic benefits by unlocking the connection between downtown and Ridenour Lake. Visitors to the lake who come into town to rent a bike or grab lunch may also stop at the antique store, the craft shop, or the Nitro Wars Museum. Furthermore, removal of the current building will raise property values and make downtown a more welcoming place to be, encouraging visitors to stay longer and spend more money. New commercial space will be an opportunity for local entrepreneurs to establish businesses and create jobs, contributing to the overall economic wellbeing of the district and the entire town.

Because the existing structure will be replaced by new construction, this redevelopment plan will also improve energy efficiency and climate mitigation on the site. The new development will require landscaping and a stormwater management plan in accordance with Nitro City Code and Municipal Separate Storm Sewer System (MS4) regulations. This plan will ensure that the site does not negatively impact the Kanawha River through contamination of stormwater runoff. Furthermore, new buildings on the site will be constructed to modern standards, including energy

efficient building materials, lighting, HVAC, and appliances. These measures will both reduce the cost of energy to maintain the building and make it more resilient to major weather events by maintaining an inhabitable temperature even in the case of power outage.

Strategy for Leveraging Resources

e. Resources Needed for Site Characterization

The West Virginia Department of Environmental Protection (WVDEP) has affirmed that sufficient site characterization has taken place to move forward with remediation. If additional characterization does become necessary, Nitro will utilize funding from Brownfields Assessment Grants held by Kanawha County or WVDEP.

f. Resources Needed for Site Remediation

The funding requested here is expected to be sufficient for site remediation. If further funding is needed, the City of Nitro will pursue alternative options, such as a loan from WV DEP’s Brownfields Revolving Loan Fund.

g. Resources Needed for Site Reuse

This project will utilize a variety of grant and loan programs to facilitate site reuse, as listed below.

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
Community Development Block Grant	Reuse	Unsecured	HUD-funded with State of WV passthrough, to be used for demolition of the current building
FASTER WV Loans	Reuse	Unsecured	Small business loans offered by Advantage Valley’s FASTER WV program to support local entrepreneurship
Business and Industry Guaranteed Loan Program	Reuse	Unsecured	USDA Rural Development loan guarantee program supporting commercial development in rural communities

h. Use of Existing Infrastructure

The former NHS site has the benefit of full connection to commercial-scale utility services. Electric, water, and sewer connections are already present onsite. The property is easily accessible with roads and sidewalks in good condition. Nitro is also served by a Kanawha Rapid Transit bus route, providing additional connectivity to the region. No infrastructure upgrades will be necessary.

2. **COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

Community Need

a. The Community's Need for Funding

The City of Nitro, West Virginia is a small post-industrial community with an estimated population of approximately 6,900 residents. According to American Communities Survey (ACS) 5-year estimates, Nitro's median household income is approximately \$52,000, below the statewide and national medians (\$57,917 and \$78,538, respectively; U.S. Census Bureau). The City also experiences an elevated poverty rate of approximately 21%, which is roughly double the federal poverty rate of 10.6% (U.S. Census Bureau), reflecting persistent economic constraints. The City's small population size and limited tax base significantly restrict its ability to finance environmental assessment and remediation independently. The cost of addressing legacy contamination far exceeds available local capital resources, and the City lacks the ability to leverage bonding or local revenues at the scale necessary to prepare the Nitro High School site for safe reuse. Without federal assistance, this contaminated property will remain stalled, perpetuating environmental risk and economic disinvestment in this vulnerable community.

b. Health or Welfare of Sensitive Populations

Contamination present on the former Nitro High School property is a particular threat to young children. Nitro has a younger population on average than the rest of West Virginia, and 24% of Census Tract 106.01 residents are minors, compared to 20% statewide. Nitro Elementary School borders the former high school site, with a playground just a few feet away from the contaminated building. The elementary school serves children in grades Pre-Kindergarten through 5, and has a total enrollment of 377 students. Of these, two-thirds are eligible for free or reduced price lunch, indicating economic challenges among the majority of Nitro Elementary School students. These children are at heightened risk of negative health outcomes both because their early developmental stages make them more vulnerable to lifelong impacts from environmental contaminants and because low-income children may lack access to high-quality healthcare and healthy lifestyles. Furthermore, their close proximity to the high school building increases their risk of exposure. The proposed cleanup project will directly address the threat of ACM exposure from the subject property.

c. Greater than Normal Incidence of Disease and Adverse Health Conditions

Air pollution in the Kanawha Valley (described in Section 2.d.) has been linked to heightened rates of cancer and asthma in Nitro. The University of Massachusetts Amherst's Political Economy Research Institute found that Nitro Elementary School is in the top 4% of schools nationwide exposed to air toxics. Accordingly, CDC's PLACES database indicates a 12.1% rate of asthma in Census Tract 106.01, well above the national rate of 8.6%. In most places, the effects of asbestos exposure take years to manifest as cancer, asbestosis, or other conditions. However, the American Federation of Teachers suggests that exposure may trigger and worsen asthma attacks, making the impacts of ACMs potentially more acute in Nitro than elsewhere. Likewise, Nitro has a 10% cancer rate among adults. Although it may not be the primary cause of cancer in the area, the American Lung Association cites asbestos as one of the leading cancer-causing contaminants in the United States. Remediation of the former high school site will directly eliminate a source of ACM exposure that threatens Nitro's children and residents.

d. Economically Impoverished/Disproportionately Impacted Populations

From its very inception, the City of Nitro has been an environmental sacrifice zone. Built to support nitrocellulose production in World War I, the town and its economy have been dominated by large-scale chemical manufacturing for over 100 years. Nitro sits in the heart of the Kanawha Valley, a region colloquially known as “Chemical Valley” or “Cancer Valley,” due to the high rates of cancer which the National Cancer Institute attributed to industrial exposures. At the height of the chemical industry in the area, there were around 20 chemical plants along the roughly 30-mile stretch of the Kanawha River between the towns of Poca and Belle. Everything from explosives to rubber to herbicides to Agent Orange were produced in Nitro over the decades.

Today, the chemical industry is much diminished in the area, but there remain 16 EPA Toxic Release Inventory sites within 10 miles of the former Nitro High School. According to CDC’s Geospatial Research, Analysis, and Services Program, Census Tract 106.01 is in the 99th percentile nationwide for proximity to potentially hazardous and toxic sites. The most significant of these, the coal-burning John Amos Power Plant, is American Electric Power’s largest generating plant. Environmental releases from the Amos Plant are primarily heavy metals found in coal ash waste, such as arsenic and barium. Exposure to these compounds can cause cancer, cardiovascular disease, kidney damage, neurological disease, and developmental disorders.

Given the high rate of poverty in the area, many of those Nitro residents who are exposed to this high level of environmental contaminants are at heightened risk of negative outcomes because they cannot afford high-quality healthcare. Though the cleanup of the Nitro High School property will not address the much greater impact of industry, it will remove one potential source of exposure to carcinogenic ACMs. Moreover, the future commercial use of the site will contribute to a broader economic development strategy that will reduce poverty in the town.

Community Engagement

e. Project Involvement & f. Project Roles

An array of local businesses, community groups, and other organizations are connected with the Nitro High School cleanup project, and will provide valuable outreach and project guidance, as listed below.

List of Organizations/Entities/Groups & Roles

Name of Organization/ Entity/Group	Entity’s Mission	Point of Contact (name & email)	Specific involvement in the project or assistance provided
Nitro Convention and Visitors Bureau	Destination development & marketing for Nitro	Joe Stevens, Director j.stevens@cityofnitro.org	Reuse input, economic development expertise
Nitro Antique Mall	Local business adjacent to subject property	Tim Arnott, Business Owner [REDACTED]	Local business liaison
Nitro Elementary School Parent-Teacher Organization	Supporting Students, Strengthening Schools	Kati Harmon, [REDACTED]	Parent and community outreach and site reuse feedback

Nitro Youth Football and Basketball League	Youth football & basketball program	Joe Murphy, President [REDACTED]	Community outreach and site reuse feedback
Advantage Valley	Economic development of southwestern WV	Bryan Shaw, Director of Entrepreneurial Development bryan@advantagevalley.com	Entrepreneurial support for redeveloped site

The WV Brownfields Assistance Center at Marshall University will also provide technical expertise at no cost throughout the duration of the grant.

g. Incorporating Community Input

Regular public meetings will be the cornerstone of Nitro’s community engagement plan. The City Manager presents monthly project updates and a quarterly project deep dive at City Council meetings. Updates on the Nitro High School cleanup project will be included in these presentations at least once each quarter, but can be shared monthly as needed. These meetings are open to the public and include opportunities for public comment on city business, including this project. For those who are not able to attend Council meetings in-person, they are also livestreamed on the City’s Facebook page. Between 15-27 people tune in to the City Council livestream regularly, and are able to provide feedback through comments on the livestream. Furthermore, social media is one of the top ways that Nitro residents get news about their community, so additional updates and interactive polls will be shared on City social media accounts to get community feedback on the project. Finally, the mayor sends a quarterly letter that is sent to all households through the service fee bill. Project updates and information about upcoming meetings and feedback opportunities will be included in the mayor’s letter throughout the duration of the project.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

c. Proposed Cleanup Plan

The cleanup plan includes one primary goal - removal of all asbestos-containing materials (ACMs) throughout the interior of the structure by a WV-licensed and experienced asbestos abatement contractor. Air quality monitoring, required for all ACM removal projects in WV, will be conducted throughout the ACM removal process to ensure air quality meets designated standards. All removed ACMs will be transported with Waste Manifest documentation to a fully licensed landfill facility for disposal. This plan meets all requirements in the West Virginia Department of Environmental Protection’s (WVDEP) Division of Air Quality asbestos removal regulations. The project, once officially started, is projected to be completed within a 12-month period, including hiring of certified contractors, asbestos abatement and final reporting.

Labor, equipment and material costs with this application are solely for the purpose of asbestos abatement and associated air quality monitoring. Other costs for structure demolition and related site preparation for new development are not included in this budget estimate and will be paid for using separate funding sources.

Description of Tasks/Activities and Outputs

Task/Activity 1: Project Management and Reporting
<p>b. Project Implementation</p> <ul style="list-style-type: none"> ● EPA-funded tasks/activities: Project management, cooperative agreement completion, quality

<p>management plan submittal and approval, and all required reporting will be conducted by City of Nitro staff. A WV licensed and certified asbestos abatement contractor, required for WV properties with ACM removal activities, will be hired through a competitive bid and State-approved process, compliant to 2CFR200.317-326 standards, to oversee project activities. The contractor hired will be experienced in all aspects of ACM removal. This task also includes finalization of the Analysis of Brownfields Cleanup Alternatives (ABCA). Updates to the Assessment, Cleanup and Redevelopment Exchange System (ACRES) will be conducted as site activities progress. One person designated by Nitro will attend at least one brownfields conference event to increase knowledge in brownfield-related site redevelopment. Public meetings will be held throughout the project timeframe on a quarterly basis (every 3 months) to update the public on project efforts, discuss any issues or concerns, and provide a means for the public to provide project input.</p> <ul style="list-style-type: none"> ● Non-EPA grant resources needed to carry out tasks/activities: The City of Nitro anticipates that administrative costs for City staff will exceed the budget amount. Resources from the City’s operating budget will support additional staff time to complete grant-related administrative tasks.
<p>c. Anticipated Project Schedule: Year 1 / Month 1 through Year 1 / Month 12</p>
<p>d. Task/Activity Lead: Kim Reed, City Manager</p>
<p>e. Outputs: Procure asbestos abatement contractor, 3 quarterly reports, 3 financial status reports, 3 quarterly meetings, finalized ABCA, attend 1 brownfields conference.</p>
<p>Task/Activity 2: ACM Removal Activities</p>
<p>b. Project Implementation: The asbestos abatement contractor hired will oversee completion of ACM removal activities, including a Site Safety Plan to be followed during all labor activities. Field Activities will include ACM removal, temporary on-site storage of ACM’s prior to transport, transport and disposal of ACM’s to a licensed landfill, and a final report with waste manifest documentations. Required air quality monitoring will be conducted throughout ACM removal activities. An Air Quality Compliance Monitoring report will be compiled with associated monitoring information at the conclusion of ACM removal activities.</p>
<p>c. Anticipated Project Schedule: Year 1 / Month 6 through Year 1 / Month 11</p>
<p>d. Task/Activity Lead: Asbestos Abatement contractor, with Nitro input</p>
<p>e. Outputs: 1 Site Safety Plan, ACM Disposal Documentation Report, Air Quality Monitoring Report, remediation of ACM’s from structure.</p>

b. Cost Estimates

The table and information below provide cost estimates and details of each task / activity to be conducted. The City of Nitro is requesting a total of **\$745,485** of EPA Brownfields Cleanup grant funds. Cost estimates have been compiled using information from Asbestos Inspection reports, experienced asbestos abatement contractors licensed in WV, WVDEP Division of Air Quality personnel, WV Department of Health’s Environmental Health Services personnel, and using information from the “EPA Interim General Budget Development Guidance for Applicant and

Recipients of EPA financial Assistance Guidelines”. Over 95% of requested funds are for ACM removal/disposal activities.

Budget Categories		Project Tasks/Activities and Totals (\$)		
		Task 1: Project Management and Reporting	Task 2: ACM Removal Activities	Total
Direct Costs	Personnel	\$18,000		\$18,000
	Fringe Benefits			
	Travel	\$1,500		\$1,500
	Equipment			
	Supplies			
	Contractual			
	Construction		\$725,985	\$725,985
	Other			
Total Direct Costs				\$745,485
Indirect Costs				
Total Budget				\$745,485

TASK 1: PROJECT MANAGEMENT AND REPORTING

Personnel Costs: 20 hours per month * 12 months = 240 hours total at average rate of \$75.00/hr = \$18,000

City of Nitro personnel will be responsible for project supervision, quarterly reporting, oversight of quarterly public meetings, and all financial reporting required.

Travel Costs: Project representative attending 1 Brownfields conference event (1 event, \$1,500 estimated cost for conference registration, hotel, per diem, and travel costs) = 1,500.

TOTAL TASK 1 = \$19,500

TASK 2: ACM REMOVAL ACTIVITIES

Contractual Costs: Complete ACM removal (includes all labor, equipment, supplies, and travel / per diem), ACM transport and disposal costs, and air monitoring costs are included. Cost is based on the Asbestos Inspection Report, completed by Pinnacle Consultants, report date September 10, 2025, for removal and disposal of the following:

- 52,865 sq ft of ACM floor tile / mastic @ \$9.00 / sq ft, \$475,785;
- 800 sq ft of ACM chalkboard mastic @ \$8.00 / sq ft, \$6,400;

- 10,600 sq ft of ACM ceiling panels @ \$6.00 / sq ft, \$63,600;
- 800 sq ft of ACM chalkboards @ \$6.00 / sq ft, \$4,800;
- 12,600 sq ft of ACM pipe insulation @ \$6.00 / sq ft, \$75,600;
- 10,400 sq ft of ACM roof materials @ \$7.00 / sq ft, \$72,800;
- removal of all window caulking, \$10,500 lump sum;
- labor to complete all required air monitoring compliance (field labor, monitoring equipment, supplies, travel) and reporting (cost based on estimated 15 days of air compliance monitoring @ \$1,100 / day), \$16,500

TOTAL TASK 2 = \$725,985

g. Plan to Measure and Evaluate Environmental Progress and Results

The City of Nitro will include an initial project kick-off meeting and subsequent quarterly public meetings (4 total), to be held at City Hall, which provides easy access (including ADA accessibility) to review project progress and take corrective actions when necessary to ensure projected outputs and outcomes are scheduled to be met, and the project is completed and brownfields funding expended within the projected 12-month project timeframe. Quarterly meetings will be open to the public and will utilize a virtual meeting option for interested community members that can't attend in-person. Each meeting will include sufficient time for reviewing community priorities and addressing any community concerns. Quarterly Reports, MBE/DBE and financial reporting will be submitted in a timely manner to EPA throughout the project timeframe, detailing the outputs and outcomes of the project. Site information will be updated as field activities progress in the ACRES database. Outputs to be tracked include the number of public meetings conducted, number of reports completed, and site remediation completion. Outcomes to be tracked include level of community participation (number of attendees, response and interaction levels, etc.), square feet of building remediated for demolition, redevelopment and related project funding leveraged, and tracking of leveraged funds.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

a.-b. Organizational Structure and Description of Key Staff

The City of Nitro's established organizational structure has clearly defined roles, internal controls, and lines of authority to ensure the timely, compliant, and successful expenditure of grant funds. The City Manager will oversee and coordinate the project, ensuring compliance with all grant conditions, federal regulations, reporting requirements, and project milestones, and for maintaining alignment with the approved workplan and budget. This role includes direct oversight of consultant procurement, coordination with regulatory agencies, and management of grant deliverables. Financial management and fiscal oversight will be administered through the City's Finance Department, which is responsible for grant accounting, reimbursement requests, internal controls, and audit compliance, and uses segregated accounting systems to ensure secure fund management. Administrative and compliance support is provided by City staff experienced in federal procurement documentation, contract administration, public notices, record retention, and reporting requirements for federally funded projects. The City maintains established procedures to ensure transparency, documentation accuracy, and adherence to local, state, and federal requirements. Technical project implementation will be supported through qualified professional

contractors with expertise in asbestos abatement and who will be selected through a competitive procurement process.

c. Acquiring Additional Resources

The City of Nitro will procure a certified Asbestos Abatement Contractor with experience in asbestos abatement and licensed by the West Virginia Department of Health. The contractor will be hired according to Competitive Procurement Standards 40 CFR Part 31.36 and the City of Nitro's purchasing and procurement procedures. The WV Brownfields Assistance Center will be available to provide technical guidance free of charge. No additional resources will be required.

Past Performance and Accomplishments

d. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments

The City of Nitro received two EPA Brownfields Assessment Grants in 2007: one worth \$200,000 to assess hazardous materials, and another, also worth \$200,000 to assess petroleum products. With these grants, the City conducted area-wide brownfields planning. They inventoried 43 hazardous brownfield properties and 48 petroleum brownfield properties in and around the city; conducted 4 Phase 1 Environmental Site Assessments and 4 Phase 2 Environmental Site Assessments (2 former chemical plant sites and 2 former service stations); developed a master conceptual plan for Nitro's riverfront area which included warehouses, an industrial park, a civic center, and athletic facilities; and held multiple public meetings to get input from the community on master plan details and to review the final master plan. These sites are not included in ACRES because ACRES was not in use at the time of these grants.

(2) Compliance with Grant Requirements

The previous Assessment Grant project was completed according to the projected timeframe and in full compliance with the expectations laid out in the Work Plan and EPA's grant and financial reporting requirements. All reports were submitted on time with the support of a Licensed Remediation Specialist and approved by the EPA Brownfields Project Manager. This grant has been closed, with no remaining funds.

THRESHOLD CRITERIA FOR CLEANUP GRANT

1. **Applicant Eligibility:** The City of Nitro is the municipal government of Nitro, West Virginia, and is eligible to receive federal funding.
2. **Previously Awarded Cleanup Grants:** The City of Nitro affirms that the site does not have a previously awarded EPA Brownfields Cleanup grant.
3. **Expenditure of Existing Multipurpose Grant Funds:** Not applicable. The City of Nitro does not have a previously awarded EPA Brownfields Multipurpose Grant.
4. **Site Ownership:** City of Nitro took ownership of the property on October 31, 2025.

5. **Basic Site Information:**

Site Name: Former Nitro High School

Site Address: 302 21st St. Nitro, WV 25143

Tax Parcel: 20-27-0004-0091-0001

6. **Status and History of Contamination at the Site:**

- a. The site is contaminated with asbestos-containing materials (ACMs).
- b. The building was constructed as a school. After it closed in 1991, it served as a multi-use civic anchor under the ownership of the Nitro Development Authority and Kingsway Church. The site housed a church, daycare facility, senior center, police station, municipal court, and a small business hub. Today, the property is vacant.
- c. ACMs are the only known contaminants on the site.
- d. The building was constructed with ACM building materials, as was common at the time. There are combined 89,365 square feet and 12,600 linear feet of ACMs, including pipe insulation, ceiling and floor tiles, blackboards, roofing, and window caulking.

7. **Brownfield Site Definition:** The City of Nitro affirms that the former Nitro High School is a) not listed or proposed for listing on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S government.

8. **Environmental Assessment Required for Cleanup Grant Applications:** An Asbestos Inspection was conducted by a WV-licensed asbestos inspector. The report was finalized on September 10, 2025.

9. **Site Characterization:** A representative of the West Virginia Brownfields Assistance Center, meeting the requirements of an Environmental Professional as defined in 40 CFR § 312.10, has reviewed and certified that the prior site characterization work is sufficient for remediation

work to occur. Because the contaminant of concern on this site is asbestos, it is not eligible to enter the state Voluntary Remediation Program, so **section c. applies**. A letter from the West Virginia Department of Environmental Protection is attached.

10. Enforcement or Other Actions: The City of Nitro affirms that there are no ongoing or anticipated environmental enforcement actions related to the former Nitro High School site.

11. Sites Requiring a Property-Specific Determination: The City of Nitro affirms that the subject property does not require a Property-Specific Determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability:

a. **Property Ownership Eligibility - Hazardous Substance Sites**

iii. **SITES WITH HAZARDOUS BUILDING MATERIAL THAT IS NOT RELEASED INTO THE ENVIRONMENT:** The City of Nitro affirms that there has been no release and that there is no threat of release of the hazardous substances from building materials into the outdoor environment based on the site condition.

13. Cleanup Authority and Oversight Structure:

- a. The site is not eligible to be enrolled in the West Virginia Voluntary Remediation Program. All Asbestos-Containing Materials will be removed from the property by a qualified asbestos abatement contractor licensed by the West Virginia Department of Health. Cleanup will occur under the oversight of the West Virginia Department of Environmental Protection's Office of Air Quality, which has jurisdiction over asbestos abatement activities that take place in the state.
- b. All site remediation activities will occur within property boundaries and within the existing structure. Adjacent properties will not be affected by proposed remediation activities.

14. Community Notification:

- a. **Draft Analysis of Brownfield Cleanup Alternatives** – A draft Analysis of Brownfields Cleanup Alternatives (ABCA) was made publicly available in advance of the community meeting. A copy of the draft ABCA is included with this application submission.
- b. **Community Notification Ad** – A public notice was published in the newspaper (*Charleston Gazette-Mail*) on January 13, 2026, and included the required information regarding the plans to submit an EPA Brownfields Cleanup grant proposal. A copy of the ad is provided with this application.

- c. **Public Meeting** – A public meeting regarding the EPA Brownfields Cleanup grant application was held on January 20, 2026. No public comments were received. A summary of the meeting and a sign-in sheet are attached to this submission.

15. Contractors and Named Subrecipients: No contractors or subrecipients have been named in this grant application.



west virginia department of environmental protection

Office of Environmental Remediation
601 57th Street SE
Charleston, WV 25304
Phone: 304-926-0499

Harold D. Ward, Cabinet Secretary
dep.wv.gov

January 15, 2026

Ms. Kim Reed, City Manager
City of Nitro
2009 20th Street
Nitro, WV 25143

RE: State Environmental Authority Acknowledgement Letter
FY26 U.S. EPA Brownfields Cleanup Grant Application
EPA-I-OLEM-OBLR-25-07

Dear Ms. Reed,

Thank you for your continued efforts to further enhance the state's environment, economy, and quality of life by applying for an FY26 U.S. EPA Brownfields Cleanup Grant. The WVDEP acknowledges that the City of Nitro plans to conduct cleanup of the former Nitro High School brownfield site located in Nitro, WV.

The WVDEP affirms that the former Nitro High School site:

- i. Is not eligible to be enrolled in the WVDEP Voluntary Remediation Program due to the contaminated media being hazardous building materials (e.g., asbestos containing materials). The WVDEP Voluntary Remediation Program does not have a remediation standard for asbestos, and as such, sites with asbestos containing materials are not eligible to enroll in the WVDEP Voluntary Remediation Program.
- ii. Has a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin, as certified by an Environmental Professional.

Additionally, should assessment needs arise in the future, funding may be available through WVDEP's current U.S EPA CWAGST Brownfields Assessment Grant to fund the additional site characterization. Also, should the site receive the Brownfields Cleanup Grant and if all funding is expended but additional remediation remains, funding may be available through WVDEP's Brownfields Revolving Loan Fund Grant to fund the additional remediation.

As you prepare your application for this funding, the WVDEP Office of Environmental Remediation is in full support of your efforts. We are committed to assist you throughout the remediation process at the former Nitro High School site and look forward to future redevelopment.

Please do not hesitate to contact me with any questions or needs. I can be reached at (304) 893-4285 or at Erin.R.Brittain@wv.gov.

Sincerely,



Erin R. Brittain, CHMM

WVDEP Brownfields Program Manager