R03-26-C-016

RE: FY2026 EPA Brownfields Cleanup Grant Application

The City of Benwood is pleased to submit this proposal for FY2026 EPA Brownfield Cleanup Grant funding. Below we provide the information requested.

1. Applicant Identification
   City of Benwood, 430 Main Street Benwood WV 26031

2. Website URL
   https://benwoodwv.gov/

3. Funding Requested
   a. Grant Type - Single Site Cleanup
   b. Federal Funds Requested - $1,500,000

4. Location
   (a) City: Benwood
   (b) County: Marshall
   (c) State or Reservation: West Viriginia

5. Property Information
   Benwood Union High School, 1690 South Marshall Street Benwood, WV 26031

6. Contacts
   a. Project Director - Dave McLaughlin, Director of Operations and Development
   430 Main Street
   Benwood, WV 26031
   Phone: 304-639-5758
   Email: dmclaughlin@benwoodwv.gov

   b. Highest-Ranking Elected Official - Walter Yates, Mayor
   430 Main Street
   Benwood, WV 26031
   Phone: 304-232-2545

7. Population
   Benwood, WV – 1,173 residents

8. Other Factors

Other Factors Criteria	Page #
Community population is 15,000 or less.	1
The applicant is, or will assist, a federally recognized Indian tribe or United States Territory.	N/A
The proposed site(s) is impacted by mine-scarred land.	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	N/A
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them.)	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	N/A
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	N/A
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	N/A

9. Releasing Copies of Application
   Not applicable – application does not contain confidential, privileged, or sensitive information.

(1) PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields

1. a. Overview of Brownfield Challenges and Description of Target Area: The Northern Panhandle of West Virginia, with its abundance of natural resources and strategic transportation routes, played a critical role in the history of industry in the United States. From the production of coal, iron ore, and timber that fueled the Industrial Revolution to cut nails, glassware, textiles and tobacco products that made the region famous and wealthy, the Northern Panhandle saw decades of prosperity and the growth of thriving, populous cities that offered a plethora of employment opportunities.

Unfortunately, this prosperity began to wane by the mid-20th century due to foreign competition. Additionally, the mechanization of coal mining reduced the number of mining jobs in the region. Many workers left the area in search of better opportunities for themselves and their families. The 1980s saw another large out-migration of families as manufacturing plants shuttered and the coal markets collapsed. Today, most municipalities in the Northern Panhandle have experienced population decreases of more than 50% from their peak.

The city of Benwood, which sits on a narrow strip of land between the Ohio River and the rugged Appalachian foothills, has faced the same rise and fall as all municipalities in the region. The city contributed substantially to the industrial success of the Northern Panhandle throughout the late 19th and early 20th centuries. Today, however, the population is only a quarter of what it was in the early 1900s, with a population of 1,245 residents.

The severe decline in both industry and population has left numerous abandoned industrial sites throughout the region. Abandoned buildings and houses pervade the region's landscape, which not only contribute to the dilapidated appearance of the area but also create feelings of despair for residents. Whereas many Rust Belt cites have focused on repurposing their former industrial sites, many cities and towns in the Northern Panhandle have trailed behind in the redevelopment of their brownfield sites.

Population decline has many negative consequences, including school closures. Many cities, including Benwood, have been left with abandoned school buildings decaying due to the high cost of demolition, caused in part by the presence of hazardous building materials like asbestos that complicate redevelopment. Dilapidated buildings cause health and safety concerns for residents and often become sites for illicit activities.

Benwood has begun to address its vacant, dilapidated properties and brownfield sites. Due to the city's small size and floodplain issues, suitable land for redevelopment is scarce; therefore, brownfield sites are frequently the only option. Benwood's former Union Junior High School site is an ideal location for redevelopment, as it sits outside the floodplain and is on Marshall Street, one of two major thoroughfares that bisect the city. Additionally, Marshall Street is served by a bus route of the Ohio Valley Regional Transit Authority, making this site an ideal location for low-income housing, seniors.

The City of Benwood has taken ownership of this former school site, and a recent environmental assessment indicates a substantial amount of asbestos. The cost of abatement is one that Benwood cannot afford; therefore, the City of Benwood is the applicant for the FY2026 EPA Brownfield Cleanup Grant. If awarded, the City plans to demolish the former school and work with the nonprofit developer, Neighborhood Development Services, to construct low-income senior housing on the site.

1.b. Description of the Proposed Brownfield Site(s): The proposed brownfield site is the former Union Junior High School building, which was constructed in the early 1900s and is located at 1695 Marshall Street in Benwood, West Virginia. The two-story brick structure contains approximately 62,000 square feet of classroom, office and gymnasium space. The Phase I Environmental Assessment conducted prior to the City of Benwood purchasing the site indicates that the building functioned as the local junior high school until it closed in the early 2000s. Ownership of the property changed hands twice before the City of Benwood became the current owner. The two owners after the school's closure did not invest in any maintenance of the structure and now the building is severely dilapidated.

The limited Phase II Environmental Assessment conducted in 2023 shows that asbestos greater than 1% was identified in the following materials: floor tiles, mastics, subfloor, wired-glass glazing, cementitious ceiling boards, electrical panel components, window caulking, wood floor vapor barrier, roofing materials, pipe insulation and fire doors. Due to the building's age, lead-based paint is also a likely contaminant. Additionally, due to its former use as a school, aged fluorescent light tubes and ballasts, which respectively contain mercury and polychlorinated biphenyls are present throughout the structure.

Furthermore, when buildings remain vacant for years, they rapidly deteriorate as windows break and roofs weaken, exposing the inside of the building to the natural elements. Benwood's climate is especially detrimental to vacant structures due to fluctuating seasonal temperatures. The region is prone to hot, humid summers with extreme rain events, while winters can be filled with snow and below freezing temperatures. The former Union School building shows evidence of water intrusion that has damaged ceilings, floors, and walls as well as broken windows, which have resulted in extensive mold growth. Reuse of the building would be an expensive endeavor.

Revitalization of the Target Area

1.c. Reuse Strategy and Alignment with Revitalization Plans: Benwood's location is ideal for both industry and for residents. The city has direct access to several key transportation routes including the Ohio River and WV Route 2. Additionally, the interchange for WV Route 2 and I-470, the auxiliary highway of I-70, is located 2.5 miles from the center of Benwood. Furthermore, a CSX Rail Line, which operates on former B&O tracks connects the city to the East, South and Midwest of the United States, as well as to two Canadian provinces.

Benwood has the potential to be an appealing city for new residents due to its proximity to Wheeling, the largest city in the region, and its lower housing costs and property taxes. However, space for new housing is limited, as the city itself consists of only 1.3 square miles. Most houses in the area were constructed in the 1930s and 40s, and many are in poor condition. As part of its revitalization strategy, the City understands that it must demolish vacant, dilapidated structures and repurpose these sites for new development.

Several years ago, Benwood was awarded a Community Development Block Grant (CDBG) for demolishing dilapidated, residential structures. The City currently is working with Belomar Regional Council (one of West Virginia's eleven Regional Planning and Development Councils) to pursue other funding for demolition, as the need is great throughout the city. Once the former Union Junior High School site has been abated and the structure demolished, this former brownfield site - combined with the adjacent city-owned parking lot – has the potential to provide 1.8 acres of space for redevelopment outside of the 100- and 500-year floodplains and along a bus route. In 2023, the City of

Benwood passed a resolution in support of collaborating with a nonprofit developer, Neighborhood Development Services, Inc., to construct low-income senior housing on the site.

1.d Outcomes and Benefits of Reuse Strategy: The reuse of the former Union High School site will provide space for the construction of a five-building campus-style senior living community. This complex will contain 25 two-bedroom, ADA-compliant units and a community building accessible to all seniors and visitors. The buildings within the complex will be connected by ADA-compliant sidewalks and ramps and four ADA-compliant parking spaces will be constructed near the entrance. Depending on funding availability, the adjacent city-owned parking lot will allow for additional development or expansion of the proposed senior housing.

The proposed project would enable the old school building to be demolished. If the adjacent City-owned parking lot is added to this parcel, it would create a 1.8 acre developable lot. With an aging population in need of housing options, the City's desire to see new senior housing constructed in this location meets not only the housing needs of senior citizens but also frees up family homes for younger generations who may struggle to find affordable, available housing otherwise.

Newly constructed housing will increase the property value not only for this site but also for neighboring properties. The construction of new housing will not cause any displacement of residents or businesses, as the site is currently unused. Infill development will save new development from occurring outside the city boundaries, which due to the area's limited flat land means development on hilltops. Unfortunately, hilltop development in the Northern Panhandle is extremely costly and often leads to landslides and slips; therefore, redeveloping the urban core is the most sustainable and economical form of development.

Strategy for Leveraging Resources

1.e Resources Needed for Site Characterization: The West Virginia Department of Environmental Protection has determined that the former Union High School site (see attachment) has been sufficiently characterized to move forward with cleanup activities. Should any additional site characterization be needed for this site or for the adjacent city-owned parking lot, Belomar Regional Council is the recipient of a FY 2024 Brownfield Assessment Coalition Grant.

1.f. Resources Needed for Site Remediation: Based on the preferred alternative of the Analysis of Brownfield Cleanup Alternatives (ABCA) submitted with this application, the funding requested herein is sufficient to address the environmental concerns for the former Union School Building.

1.g. Resources Needed for Site Reuse: If the EPA Brownfield Cleanup grant is awarded, the City of Benwood will move forward with cleanup at the site. The City, with the assistance of Belomar Regional Council, will seek funding for demolition. The State of West Virginia has several programs that fund demolition of commercial and residential structures. The State's **Community Development Block Grant (CDBG)** has funding opportunities for demolition. Additionally, the **West Virginia Department of Environmental Protection's Dilapidated Properties Program (DLAP)** has provided many municipalities throughout the state with demolition funding for the past several years. The State of West Virginia realizes that vacant, dilapidated properties are a concern for nearly every municipality in the state; therefore, they have increased funding for demolition programs.

After cleanup and demolition, the City of Benwood will work with the nonprofit developer to submit an application to the **West Virginia Housing Development Fund** for the necessary financing for the construction of low-income senior housing. The project site is located in an eligible **New Market Tax**

Credit (NMTC) Census Tract, which would be available if there is a commercial element added to the project that generated at least 20% of the project's revenues. **Low-Income Housing Tax Credits (LIHTC)** are also available to the developer, since the entire project will be for low-income residents. **HOME Investment Partnership Program (HOME)** funding is also available to the City of Benwood. HOME is the largest federal block grant designed to create affordable housing for low-income residents.

1.h. Use of Existing Infrastructure: The Former Union High School site is located on the southern end of Benwood along Marshall Street and is served by existing infrastructure. This includes water (City of Benwood Water Department), sanitary sewer (City of Benwood Sanitary Sewer Department), stormwater (City of Benwood Stormwater Department), electric (Appalachian Power), and broadband (Comcast and Frontier). Since Marshall Street is one of two major thoroughfares, the utilities are easily accessible to the site.

Additionally, the site is served by existing sidewalk infrastructure, which connects to other neighborhoods in Benwood, including the central business district, as well as to the city of McMechen, which lies directly south. Perhaps most importantly, the site is served by an existing local bus route of the Ohio Valley Regional Transit Authority. This route connects Benwood to the region's largest municipality, Wheeling, and provides access to the Northern Panhandle's largest hospital and other essential services.

(2) COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need

2.a. The Community's Need for Funding: Benwood is one of the Northern Panhandle's smallest municipalities with only 1,245 residents. It is also one of the most distressed. Due to its small population, coupled with a high poverty rate that is more than double the national rate, the City of Benwood does not have the resources to fund the asbestos abatement at the former Union Junior High School. Table 1 provides some indicators that validate the level of distress the city and its residents face.

Table 1. Economic Distress Data for Target Area

Data Type	United States	West Virginia	Marshall County	City of Benwood
Poverty Rates	12.4%	16.7%	15.0%	24.9%
Median Household Income	$78,538	$57,917	$60,329	$39,474
Unemployment	5.2%	5.7%	4.0%	3.3%
Population Not in Labor Force	36.5%	46.4%	44.8%	32.6%
Median Home Values	$360,600	$155,600	$139,800	$90,400
Vacant Housing Units	10.4%	16.1%	15.2%	20.5%

Data Source: 2023 5-Year American Community Survey

For example, the median household income is half the MHI of the United States and lower than both the State and the county where it is located. Additionally, median home values are ¼ the national average, and 20.5% of housing units are vacant. Many of these units have decayed beyond repair. This cleanup grant will allow the City of Benwood to address its largest, vacant, dilapidated structure and offer a chance for needed redevelopment.

2.b. Health or Welfare of Sensitive Populations: Benwood has a significant elderly population, with 21.1% of residents aged 65 or older (Table 2). Benwood residents are twice as likely to receive SSI when compared to the national average and households are three times as likely to receive both SNAP

and Cash Public Assistance when compared to the rest of the United States (Table 2). Low income, elderly residents are an extremely sensitive population with many living in homes they cannot maintain. If awarded, this cleanup grant will fund the first critical step in a redevelopment project that will provide affordable, ADA-compliant housing for vulnerable senior citizens.

2.c. Greater Than Normal Incidence of Disease and Adverse Health Conditions: West Virginia has the highest disability rate in the nation at 19.1%, and Benwood's rate is even higher at 21.4% (Table 2). This population often has special needs when it comes to housing that do not necessarily align with traditional housing in the city (e.g. ramps to entrances, single-story living). Benwood residents also have a cancer incidence rate that is higher than both the state and national average, and asthma prevalence above the national average. These data points are unsurprising due to the industrial nature of the city and its location in the top coal producing county in West Virginia.

Table 2: Sensitive Populations and Adverse Health Conditions

Data Type	United States	West Virginia	Marshall County	City of Benwood
65 Years and Over	16.8%	20.7%	23.2%	21.1%
Households Receiving SSI	5.1%	7.1%	4.7%	11.4%
Households Receiving Cash Public Assistance	2.7%	3.3%	3.0%	8.0%
Households Receiving SNAP	11.8%	17.2%	20.0%	33.5%
Have Disability	13.0%	19.1%	18.5%	21.4%
Cancer Incidence Rates (cases per 100,000)	444.4	489.8	495.9*	495.9*
Asthma Prevalence	10.3%	13.9%	12.0%	13.7%

Data Sources: 2023 5-Year American Community Survey for all except Cancer Incidence Rates from National Cancer Institute's State Cancer Profiles (2017-2021) and Asthma Prevalence form the CDC's Behavioral Risk Factor Surveillance System and PLACES model (2023) * Data for the Health Service Area that includes Benwood and rest of Marshall County.

2.d. Economically Impoverished/Disproportionately Impacted Population: Table 3 demonstrates low educational attainment by Benwood residents. Only 9.1% of residents have a bachelor's degree or higher, which is far less than the national rate of 35%. West Virginia has the lowest educational attainment in the nation, which continues poverty cycles and limits social mobility. Employers that could provide higher paying jobs also are less likely to relocate or open offices in West Virginia because of the lack of a skilled, well-educated labor force.

Table 3: Disproportionately Impacted Populations

Data Type	United States	West Virginia	Marshall County	City of Benwood
% Bachelor's Degree or Higher (25+)	35%	23.3%	19.1%	9.1%
Less than High School (18+)	10.7%	11.3%	7.9%	13.9%
No Vehicle	8.3%	8.2%	7.6%	16.0%

Data Sources: 2023 5-Year American Community Survey

Table 3 also shows that 16% of Benwood residents do not own a vehicle. Although Benwood is served by one bus route from the regional transit authority, it offers limited service when compared to larger metropolitan areas. Additionally, there are no grocery stores within the city limits, which is especially burdensome to those who do not have a vehicle and must use public transportation to access food.

Community Engagement

2.e. Project Involvement and 2.f. Project Roles: The chart below identifies entities, points of contact and titles, and the roles of those individuals involved in the project.

Name of Organization	Organization Type	Point of Contact	Project Role
City of Benwood	Municipality	Walter Yates, Mayor 304-232-2545	Grant applicant

		tankrom@benwoodwv.gov	
City of Benwood	Municipality	Dave McLaughlin, Director of Operations and Development 304-639-5758 dmclaughlin@benwoodwv.gov	Grant applicant, project lead for Benwood
Belomar Regional Council	West Virginia Regional Council	Natalie Hamilton 304-242-1800 nhamilton@belomar.org	Grant application assistance and oversight
Neighborhood Development Services, Inc.	Regional, non-profit developer	Theresa Gambatese 440-554-6759 tgambatese@ndsohio.org	Developer
Four Point Architectural Services, Inc.	Architect	Jonathan Morschl, AIA 330-753-9710 jmorschl@4points.net	Project architect
Kristoffy Capital, Inc.	Real estate agency that offers tax credit syndication	Heather Slack 740-359-5145 kristoffycapital@icloud.com	Assistance with New Market Tax Credits
West Virginia Northern Brownfield Assistance Center	West Virginia Regional Council	Natalie Hamilton 304-242-1800 nhamilton@belomar.org	Grant application assistance and oversight

2.g. Incorporating Community Input: If EPA cleanup funding is awarded, the City of Benwood will work closely with Belomar Regional Council to develop an outreach plan to inform the community and gather input on the project and the redevelopment of the site. Belomar staff are well-versed in community outreach. The City of Benwood will also ensure that time is set aside during their bi-monthly council meetings to discuss the project and allow public comment. The city building and council chambers are in the center of the community and are fully ADA-compliant.

The City of Benwood has an active website and Facebook page to disseminate news and information. The City of Benwood will create a page on their website to share information about the project and allow residents to submit comments/concerns. Notice of all public meetings regarding the project will be posted on both the website and Facebook page.

(3) TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan: From the Phase II ESA completed in 2023, the major contaminant is friable asbestos, which was found in the following materials: floor tiles, mastics, subfloor, wired-glass glazing, cementitious ceiling boards, electrical panel components, window caulking, wood floor vapor barrier, roofing materials, pipe insulation, and fire doors. Additional hazardous materials, such as fluorescent lighting and ballasts will be removed safely and disposed at specialized facilities. As part of the cleanup plan the following will be hired: 1) a Qualified Environmental Professional (QEP) to oversee cleanup activities and quality assurance; 2) a licensed structural engineer to ensure that asbestos containing materials can be safely removed from the structure; and 3) a licensed asbestos, lead, and hazardous cleanup materials abatement contractor to safely remediate all contaminants. All abatement activities will comply with local, state and federal regulations. Implementation of the proposed cleanup plan will ensure that the building can be demolished safely. This site does not need to be enrolled in West Virginia's Voluntary Remediation Program, since it is for asbestos abatement.

3.b – 3.e. Description of Tasks/Activities and Outputs

Task/Activity 1: Programmatic Oversight
b. Project Implementation • **EPA-funded task/activities:** Grant management; project reporting; community engagement; stakeholder and public engagement

c. Anticipated Project Schedule: Months 1-36
d. Task/Activity Lead: City of Benwood/Belomar Regional Council
e. Outputs: 12 quarterly reports; 3 annual reports; 1 final report; 2 brownfield trainings and events*; 1 project execution plan; 2 public meetings; 2 public notice periods; 3 stakeholder meetings; 3 sets of promotional media updates
Task/Activity 2: Engineering and Safety Planning
b. Project Implementation • **EPA-funded task/activities:** Structural engineering and inspections; preparation of health & safety plan in coordination with local, state & federal regulations
c. Anticipated Project Schedule: Months 4-30
d. Task/Activity Lead: Led by QEP Contractor under direction of City of Benwood/Belomar Regional Council
e. Outputs: 1 Structural Engineering Report; 1 Health and Safety Plan
Task/Activity 3: Remediation Procurement and Oversight
b. Project Implementation • **EPA-funded task/activities:** Prepare request for proposals; evaluate contractor applications; conduct interviews, hire cleanup contractor; oversee scope of work implementation
c. Anticipated Project Schedule: Months 12-36
d. Task/Activity Lead: Belomar Regional Council/QEP Contractor
e. Outputs: 1 set of bid documents and specifications; 1 public request for bid process: 1 pre-bid meeting, 1 question and answer documents, 1 set opinion of scope and costs, 1 award contract; 8–12 project status meetings; 1 contractor performance evaluation
Task/Activity 4: Asbestos and other Hazardous Materials Abatement
b. Project Implementation • **EPA-funded task/activities:** Implement site cleanup; communicate project status reporting; prepare report detailing final completion
c. Anticipated Project Schedule: Months 14-34
d. Task/Activity Lead: Cleanup contractor with oversight of QEP, under direction of City of Benwood/Belomar Regional Council
e. Outputs: Removal & Disposal of quantity of: asbestos containing materials and other hazardous materials; quantity of clean post-cleanup samples; 8-12 regular status updates and percent complete reports; 1 completion report

* Belomar Regional Council staff will attend national and state brownfield conferences with travel funds from their current FY 2024 EPA Brownfield Assessment grant.

3.f. Cost Estimates: Below are cost estimates by task. If awarded, Belomar Regional Council will administer the grant. Personnel costs are based on an average rate of $79/hour ($28 personnel salary + $16 fringe benefits + $35 indirect). QEP contractor, Structural Engineering, and Abatement Contractor Costs are estimated on a "deliverable" basis, as a range of prices are to be expected.

Budget Categories	Task 1 Programmatic Oversight	Task 2 Engineering and Safety Planning	Task 3 Remediation Procurement and Oversight	Task 4 Remediation	Total
Personnel	$2,714	$281	$281	$281	$3,557
Fringe Benefits	$1,590	$165	$165	$165	$2,085
Travel					
Equipment					
Supplies					
Contractual	$50,000	$200,000	$50,000		$300,000
Construction				$1,190,000	$1,190,000
Other					
Total Direct Costs	$54,304	$200,446	$50,446	$1,190,446	$1,495,642
Indirect Costs	$3,323	$345	$345	$345	$4,358
Total	$57,627	$200,791	$50,791	$1,190,791	$1,500,000

Task 1 - Programmatic Oversight: This task includes Belomar Regional Council's time for program development, oversight, and reporting requirements (30.5 hours), the procurement and oversight of a prime consultant (15 hours), community and stakeholder engagement activities (15 hours) and participation in 36 project management meetings (36 hours). Belomar Regional Council staff will attend national and state brownfield meetings under their current assessment grant; therefore, there will be funds allocated to travel in this budget. This task also includes budget to engage a QEP consultant to oversee all other project professionals and tasks, assist Belomar Regional Council with EPA reporting requirements, and draft and maintain a project execution plan (estimated $27,000). Additionally, the QEP will be responsible for the following: 2 public meetings and 2 public notice periods (estimated $10,000); meeting and targeted outreach and coordination with at least three stakeholder groups (estimated $5,000), production-quality promotional media updates at the beginning, middle, and end of project (estimated $3,000), and project management meetings (estimated $5,000).

Task 2 – Engineering and Safety Planning: This task includes:

- $100,000 for a structural engineer to oversee cleanup design and implementation. These activities are estimated at $25,000 for inventory and analysis and initial concept development, $8,000 for participatory activities with stakeholders and the public (with Task 1 meetings), $30,000 for approving construction drawings for site cleanup and $37,000 for ongoing involvement during site cleanup.
- $50,000 for the Health and Safety Planning: fees for a hazardous materials specialist to develop a Health and Safety Plan (HASP) estimated at $20,000 and for participating in the site inventory and analysis and initial concept development process and $30,000 for developing a HASP that will be followed throughout Task 3 and Task 4.
- $50,000 estimated for the QEP contractor for project management and oversight
- $791 for Belomar Regional Council staff oversight (10 hours)

Task 3 – Remediation Procurement and Oversight: This task includes fees to implement a competitive procurement process that will be implemented by Belomar Regional Council (10 hours). The QEP consultant will assist Belomar Regional Council with draft and final bid documents for $5,000; $2,000 for question and answer documents; and $3,000 for finalizing construction specifics. The QEP consultant will manage the cleanup contractor and provide quality assurance throughout the cleanup process, which will include $10,000 for project status updates, $20,000 for 80 weekly site inspections and testing during cleanup, $4,000 for cleanup contractor performance evaluation and $6,000 for preparation of final clearance documentation.

Task 4 – Remediation: This task includes the cost of cleanup construction to remove and remediate hazardous materials in accordance with structural and heal and safety plans mentioned in Task 2. The cost breakdown for this task is as follows:

- $700,000 for ACM removal: 24,910 SF of floor tile and mastics at $5/SF = $124,550; 12 wired glazing window sets @ $1,000 per set = $12,000; 800 SF of cementitious ceiling boards @ $10/SF = $8,000; 6 cementitious electrical panel components @ $2,000 per panel = $12,000; 800 SF of carpet mastic @ $6/SF = $4,800; 2,450 LF of window caulk @ $5/LF = $6,750; 100 LF of door caulk at $25/LF = $2,500; 2,100 SF of wood floor vapor barrier @ $5/SF = $10,500; 5,250 SF of roofing core @ $80/SF = $420,000; 200 LF of roof flashing @ $22/SF = $8,800; 17,000 SF of

roofing materials @ $5/SF = $85,000; 3 LF of pipe insulation @ $15/LF = $45; and 12 fire doors $400/door = $48,000

- $100,000 for other hazardous building materials removal (estimated $50,000 for removal and disposal of electrical equipment, fluorescent lightbulbs, and other materials and estimated $50,000 to address areas that will become accessible during site cleanup).
- $40,000 for targeted materials sampling (100 separate material samples to ensure that materials are non-hazardous at $400/sample)
- $340,000 estimated for additional water intrusion that will cause conditions to worsen until cleanup funding is secured and remediation occurs.
- $791 for oversight from Belomar Regional Council staff (10 hours)

3.g. Plan to Measure and Evaluate Environmental Progress and Results

Belomar Regional Council (along with the City of Benwood) will track and evaluate progress through quarterly reports and three annual reports outlining the progress and output achievement as stated in the work plan. All reports will include the following: task updates, overall project progress, and quarterly and annual funds spent. All information will be updated quarterly in the ACRES database. Belomar Regional Council along with the QEP consultant will be in regular communication with the US EPA program officer for the project.

(4) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

4.a. Organizational Structure and 4.b. Description of Key Staff: The City of Benwood is comprised of an eight-person city council, mayor, city clerk/treasurer, four supportive administrative staff, Director of Operations and Development, and six supportive operations and development staff. The key staff member for the project will be the City's Director of Operations & Development, Dave McLaughlin, who has over 33 years of experience with local government and has served in his current role for seven years.

Belomar Regional Council, one of eleven regional planning and development councils in West Virginia, will administer the cleanup grant and be responsible for the day-to-day activities. Belomar itself is the recipient of three EPA Brownfield Assessment grants and their brownfield planner, who is AICP certified, has gained extensive knowledge through national and state brownfield conferences and other trainings. Belomar will work closely with the City of Benwood to administer the grant, hold public meetings and submit grant reports and requirements in a timely manner.

4.c. Acquiring Additional Resources: Additionally, the City of Benwood has access to the expertise of the Northern West Virginia Brownfield Assistance Center located at West Virginia University. This organization provides webinars, trainings, and technical assistance to West Virginian communities on the brownfield redevelopment process.

Past Performance and Accomplishments

4.e. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Financial Assistance Agreements:

(1) Purpose and Accomplishments: The City of Benwood has been awarded several federal and state financial assistance agreements of nearly $9.5 million. From the Clean Water State Revolving Fund, the City received the following: Phase I Combined Sewer Separation for $2.4 million in 2017, Phase II Combined Sewer Separation for $2.7 million in 2023, Phase III Combined Sewer Separation for $2

million, and Phase IV Combined Sewer Separation for $1.5 million in 2024. Additionally, the City has received two Land and Water Conservation Fund (LWCF) grants in the amounts of $400,000 and $186,000 for the rehabilitation of their city pool. Several years ago, Benwood received a Community Development Block Grant of $219,000 for demolition of dilapidated residential structures. The combined sewer separation grants have reduced the amount of untreated sewage discharges into the Ohio River, helping to improve water quality. The LWCF grants have allowed Benwood to keep its city pool open for its residents.

(2) Compliance with Grant Requirements: The City of Benwood will utilize the grant administration services of Belomar Regional Council to ensure the City complies with all requirements of the EPA Brownfield Cleanup grant. Belomar will assist the City with the procurement process to contract a qualified environmental consultant to address the technical requirements of the project. Belomar works within the Federal Procurement Standards in 2 CFR 200.317-326 and the 5G Procurement Standards mandated by West Virginia State Code. Belomar has been awarded three EPA Brownfield Assessment grants (FY 2019, FY 2021 and FY 2024) and is familiar with complying to the workplan, schedule, and terms and conditions, as well as submitting quarterly and final reports in a timely manner.

LIST OF ATTACHMENTS

A Threshold Criteria Responses

B State Agency Letter of Acknowledgement

C Deed

D Analysis of Brownfield Cleanup Alternatives (DRAFT)

E Community Ad Notification Documentation

F Public Comments and Responses

G Public Meeting Notes

H Public Meeting Sign-In Sheet/Participant List

ATTACHMENT A

Threshold Criteria Responses

Attachment A: Threshold Criteria Response

1. APPLICANT ELIGIBILITY:

1.a. Applicant Type:

The applicant, the City of Benwood is a general purpose unit of local government and political subdivision of the State of West Virginia, legally constituted and validly existing under the laws of the state of West Virginia, and is an eligible applicant for purposes of the FY26 EPA Brownfield Cleanup Grant. The Notice of Funding Opportunity (Funding Opportunity Number EPA-I-OLEM-OBLR-25-07) lists "General Purpose Unit of Local Government" as an eligible applicant to apply for the grant.

1.b. Federal Taxation Exemption Status:

Not applicable. The City of Benwood is a local unit of government and not a 501(c)(4).

2. PREVIOUSLY AWARDED CLEANUP GRANTS:

The subject site of this grant application is the former Union Junior High School Building, located at 1695 Marshall Street in Benwood, West Virginia, herein referred to as "the site". The former Union Junior High School building has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. EXPENDITURE OF EXISTING MULTIPURPOSE GRANT FUNDS:

The City of Benwood does have an open EPA Brownfield Multipurpose Grant, nor have they ever received such a grant.

4. SITE OWNERSHIP:

The City of Benwood is the sole owner of the site and will retain ownership through the cleanup. The City of Benwood acquired the site on January 23, 2026. See deed, included as Attachment B.

5. BASIC SITE INFORMATION:

5.a. Site Name: Former Union Junior High School Site

5.b. Site Address: 1695 Marshall Avenue Benwood, WV 26031

6. STATUS HISTORY AND CONTAMINATION AT THE SITE:

6.a. Type of Contamination: It has been confirmed that the former Union Junior High School Building is contaminated with asbestos and other hazardous materials.

6.b. Operational History and Current Use(s): The building operated as a junior high school from the early 1900s until the early 2000s. The building was then purchased by a roofing company, who used the building for storage purposes and business office operations until 2006. Since 2006, the building has remained empty.

6.c. Environmental Concerns: Site characterization activities have confirmed that the building contains asbestos, lead paint, as well as fluorescent lighting and ballasts, which contain hazardous materials.

6.d. How the Site Became Contaminated and Extent of Contamination: Asbestos and

10. Enforcement of Other Actions:
The applicant affirms that there are no known ongoing or anticipated environmental enforcement related to the site for which Brownfield funding is being requested. There have been no inquiries, or orders from federal, state, or local government entities that the City of Benwood is aware of regarding the responsibility of any party (including the applicant) for the asbestos at the former Union Junior High School building. Additionally, there are no environmental liens on the property.

11. Sites Requiring a Property-Specific Determination:
None of the special classes of property that require a property-specific determination in order to be eligible for funding apply to the site.

12. Threshold Criteria related to CERCLA/Petroleum Liability:
12.a Property Ownership Eligibility – Hazardous Substance Sites: The contaminants of concern are asbestos and other hazardous building materials.

i. Exemptions to CERCLA Liability: Responses to iv. are provide below.

(1) Sites With Hazardous Building Material That Is Not Released Into the Environment.

The brownfield site, the former Union Junior High School has a hazardous substance contained in the building materials and the hazardous substance has not been release and there is no threat of release of these contaminants into the outdoor environment.

12.b Property Ownership Eligibility – Petroleum Sites: Not applicable.

13. Cleanup Authority and Oversight Structure:

13.a. Description of Cleanup Oversight Structure: WVDEP's Voluntary Remediation Program does not manage asbestos cleanups; therefore, the City of Benwood will consult directly with the EPA to ensure the cleanup is protective to human health and the environment. If awarded, the City of Benwood, will implement a competitive procurement process to procure a Qualified Environmental Professional (QEP) to oversee cleanup activities. The QEP will lead a team of professionals who are licensed in the State of West Virginia to abate asbestos and other hazardous building materials.

13.b. Impact of Cleanup Response Activities on Adjacent & Neighboring Properties:
Based on the asbestos assessment, there is no exception that a cleanup response at the site will impact adjacent properties or neighboring sites.

14. Communication Notification:
The City of Benwood provided the community with notice of its intent to apply for an EPA Brownfield Clean Grant and provided the community an opportunity to comment on the draft grant application package, including the draft ABCA. Community notification details are provided below.

15.a. Contractors: Not Applicable. A contractor will be procured upon grant award. The City of Benwood will comply with all applicable procurement standards, including 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33.

15.b. Subrecipients: Not Applicable. No subrecipients are named nor are any anticipated.

ATTACHMENT B

State Agency Letter of Acknowledgement

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 26, 2026

Mr. Walter Yates, Mayor
City of Benwood
430 Main Street
Benwood, WV 26031

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

Dear Mayor Yates,

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 Benwood plans to conduct cleanup of the former Union High School brownfield site located in Benwood, WV.

The WVDEP affirms that the former Union 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 Union 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

Erin R. Brittain, CHMM
WVDEP Brownfields Program Manager