

DRAFT

FY 2016 EPA Brownfields Cleanup Grant Application

The Lodge

1000 Williams Drive

Weirton, WV

December 1, 2015

Application due: December 18th, 2015

December 18, 2015

Environmental Protection Agency Region 3
Attn: Tom Stolle
1650 Arch Street
Mail Code 3HS51
Philadelphia, PA 19103

Re: Business Development Corporation of the Northern Panhandle
FY2016 EPA Brownfields Site-Specific Hazardous Cleanup Grant Application

Dear Mr. Stolle:

The Business Development Corporation of the Northern Panhandle (BDC) is pleased to submit our application for a 2016 EPA Brownfields Site-Specific Hazardous Cleanup Grant for The Lodge at The Williams property in Weirton, West Virginia.

This application will fund the cleanup of a 10,000-sq. ft., three-story, stone structure, on a 4.16 acre site, that was constructed in 1932. Funds are requested to support a critical \$5.5 million redevelopment and preservation effort for a planned inn, restaurant, and conference center in the city of Weirton. The impact to the local economy will preserve 48 jobs and add 12 new jobs, to a historic site that has been underused for approximately 30 years.

The closing and downsizing of numerous factories in our region, over the past 10 years, have caused a significant increase in local unemployment and a general feeling of distress regarding the future economic stability of the region. However, during this same timeframe, the BDC has been strategically and systematically acquiring and repurposing a number of brownfields in West Virginia's northern panhandle to attract private investment and reduce unemployment. The only impediment to the successful repurposing of The Williams is the asbestos abatement prior to the repurposing of the building and site. The \$200,000 in cleanup grant funding would make possible a job-creating end use of this site that will be the culmination of considerable efforts made by the BDC, private investors, USEPA, WVDEP, Hancock County, City of Weirton, and its residents to restore and repurpose this grand site that would be fitting for the original home of Weirton's most storied individual, Ernest T. Weir, the ingenious and entrepreneurial founder of Weirton Steel in 1909 and the City of Weirton in 1947.

USEPA's assistance will leverage a redevelopment effort that will ensure an annual payroll of almost \$1.5 million, raise approximately \$300,000 annually for local charities and civic organizations, and generate over \$6.0 million for our local economy.

- a. **Applicant Identification:** Business Development Corporation of the Northern Panhandle
3174 Pennsylvania Ave, Suite 1, Weirton, WV 26062
- b. **Applicant DUNS number:** 879886588
- c. **Funding Requested:**
i. Grant Type: Cleanup
ii. Federal Funds Requested: \$200,000; Cost Share: \$40,000 (No Waiver Requested)
iii. Contamination Type: Hazardous Substances
- d. **Location:**
City – Weirton; County – Hancock; State – West Virginia
- e. **Property Information:**
The Williams
1000 Williams Drive
Weirton, WV 26062
- f. **Contacts:**
i) Project Director: Patrick Ford
Phone number: 304-748-5041
Fax number: 304-748-0241
Email address: pford007@gmail.com
Mailing address: 3174 Pennsylvania Ave,
Suite 1, Weirton, WV 26062
ii) Chief Executive: William D'Alesio,
President - Board of Directors
Phone number: 304-670-0803
Fax number: 304-748-0241
Email address: bmwbill46@gmail.com
Mailing address: 3174 Pennsylvania Ave,
Suite 1, Weirton, WV 26062
- g. **Date Submitted:** December 18, 2015
- h. **Project Period:** Three years (October 1, 2016 – September 30, 2019) estimated
- i. **Population:** i) 19,362 (2014 U.S. Census estimate)
ii) The City of Weirton is a municipal form of Government
- j. **“Other Factors” Checklist:** Checklist attached

We thank you for your consideration of this proposal and ask that you approve and fully fund this request.

Sincerely,

Patrick B. Ford, Executive Director
Business Development Corporation of the Northern Panhandle

NARRATIVE PROPOSAL

1. Community Need [20 Points]

a. Targeted Community and Brownfields [8 points]

Targeted Community Description

The small village called Holliday's Cove, which is now most of downtown Weirton, was founded in 1793. In 1905 Ernest T. Weir, a Pittsburgh, Pennsylvania-area steel employee, bought the Phillips Sheet and Tin Plate Company, an ailing steel company in Clarksburg, WV. The plant flourished under Weir's stewardship, and within four years he was looking for a new site to accommodate expansion. The site would have to have access to coal mines, water sources, river and rail transportation, and centers of industry.

Weir found his ideal industrial site in the northern finger of West Virginia that separates Ohio and Pennsylvania, about 39 miles from Pittsburgh. In 1909 Weir began building on 105 acres he purchased near the hamlet of Holliday's Cove. By the end of the year, Weir had ten steel mills operating and mill workers had started to come in from as far away as Greece and Italy; many of their descendants living in Weirton today. Ernest T. Weir built the steel mill later known as Weirton Steel Corporation just north of Holliday's Cove. An unincorporated settlement called Weirton grew up around the mill that, by 1940, was said to be the largest unincorporated city in the United States. By then, Holliday's Cove and two other outlying areas, Weirton Heights and Marland Heights (location of the subject site) located on hilltops or ridges surrounding the "Weir-Cove" area, had also incorporated. On July 1, 1947, Hollidays Cove, Marland Heights, Weirton Heights, and unincorporated Weirton, merged and formed the city of Weirton as it currently exists.

The fortunes of Weirton, a quintessential company town, have risen and fallen with those of Weirton Steel Corporation which was once a fully integrated steel mill employing over 13,000 people on 1,993 acres in the city limits. It was the largest private employer and the largest taxpayer in West Virginia. This is no longer true. Due to reorganization of the steel industry, not only within the United States but worldwide, the Weirton plant, now part of the international giant ArcelorMittal, currently operates only the tin-plating section of the mill (though still one of the country's largest tin-plate makers) on approximately 200 acres of the 1,993 acres, with approximately 900 workers.

Demographic Information

Weirton's unhealthy economic climate results in the wake of the steel industry collapse. Negative statistics, when compared nationally, include a decreasing population, a high poverty rate, high unemployment, an older median age, high proportion of older housing, a high proportion of people not in labor force, and high disability rates. Also, low income, decreasing population, low house values, and low proportion of people with college education are negative and of concern in Weirton. Weirton's population has been steadily decreasing since the 1970's. Between 1970 and 2013, Weirton's population declined from 27,131 to 19,634, a decrease of 7,497 people and a 27% population loss. In fact, a large proportion of this loss occurred between 1980 and 2000 when Weirton's population declined from 24,736 to 20,411, a decrease of 4,325 people and 17% of the total population.

The poverty rate of 16.0% in Weirton and 16.9% in Hancock County is higher than the national average of 15.4%. The poverty rate in Weirton has increased significantly from 10.3% to 16.0% between 2000 and 2013. Even more alarming is the 14.4% to 30.6% increase in the number of people under the age of 18 who are below the poverty level over the same 13 year period from 2000 to 2013.

Demographic Information	Weirton, WV	Hancock County, WV	Brooke County, WV	West Virginia	National
Population:	19,634 ¹	30,517 ¹	23,932 ¹	1,853,619 ¹	311,536,594 ¹
Unemployment:	7.4% ²	7.5% ²	6.4% ²	7.4% ²	4.8% ²
Poverty Rate:	16.0% ¹	16.9% ¹	13.1% ¹	17.9% ¹	15.4% ¹
Median Household Income:	\$38,432	\$38,522 ¹	\$42,493 ¹	\$41,043 ¹	\$53,046 ¹
Median House Value:	\$86,000 ¹	\$84,700 ¹	\$82,300 ¹	\$98,500 ¹	\$176,700 ¹
Median Age (yrs):	45.7 ¹	45.1 ¹	45.2 ¹	41.5 ¹	37.3 ¹
Houses Built in 1989 or Earlier	90.8% ¹	88.0% ¹	88.6% ¹	75.6% ¹	70.9% ¹
Houses Built 1990 or later:	9.0% ¹	12.1% ¹	11.4% ¹	24.4% ¹	29.2% ¹
% Not in Labor force (16yrs & up):	41.8% ¹	42.3% ¹	44.0% ¹	45.4% ¹	35.7% ¹
Disability Rate Under 65 years old	13.9% ¹	13.8% ¹	13.7%	14.2% ¹	8.4% ¹
Bachelor's Degree or Higher	18.3% ¹	15.7% ¹	17.0% ¹	18.3% ¹	28.8% ¹
¹ Data are from the 2009 – 2013 American Community Survey and are available on American FactFinder at http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_13_5YR_DP03&src=pt and http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_13_5YR_DP05&prodType=table ² Data are from the Bureau of Labor Statistics and are available at www.bls.gov .					

The decline of the steel industry in Weirton has definitely had negative impacts on the workforce. Unemployment in Weirton at 7.4%, is 2.6% higher than the national average at 4.8%. From 2003 to 2010 Weirton Steel moved from the 5th largest employer in West Virginia to the 67th largest. In 1980, approximately 14,000 were employed by Weirton Steel, which was 57% of Weirton's population of 24,736. Thirty years later in 2010, approximately 1,000 employees remained at the facility, which was only 5% of Weirton's population of 19,746. Weirton's workforce has had difficulty rebounding, and this proportion of workers employed by Weirton Steel or its current owner has remained consistent at 5% since 2010.

The percentage of people not in the workforce in Weirton is significantly higher than the national average and even higher in West Virginia and in Brooke and Hancock counties. Weirton's percentage not in the labor force is at 41.8%, which is 6.1% higher than the national average of 35.7%. The number of folks not in the labor force in Brooke and Hancock counties, where Weirton sits, is between 6.6% and 8.3 higher than the national average. West Virginia is even higher at 9.7% above the national average.

The housing stock in Weirton, Hancock County, Brooke County, and West Virginia is significantly older than the national average. The percentage of homes built in 1979 and earlier in Weirton is at 86.9%, and is

almost 30% higher than the national average, which is at 57%. Also, the percentage of homes built in Weirton from 1990 to the 2013 Census was at 9% and is over 20% lower than the national average at 29.2%. Also, 23% of houses in Brooke County were built in 1939 or earlier, which is significantly higher than the national average of 13.5%.

The median age of residents in 2013 within Weirton was 45.7 years old, or 8.4 years older than the national average of 37.3 years old, and from 2000 to 2013 the median age in Weirton has increased from 43.5 to 45.7 years old. Weirton's median household income of \$38,432 is \$14,614 below the national average of \$53,046, a 27.5% difference. In 2013, Hancock and Brooke counties were also significantly below the national average for income at \$38,522 and \$42,493 between 27.3% and 19.8% below the national average. 48% of the Blockgroup 540290214004 which surrounds Weirton is low income (<2x poverty level).

The disability rates of individuals under 65 years old in Weirton and in Brooke and Hancock counties is over 5% higher than the national average of 8.4%, while the percentage of college-educated individuals in Weirton and the surrounding counties is significantly lower than the national average. Weirton's population that holds a bachelor's degree or higher at 18.3% is over 10% lower than the national average, which is at 28.8%.

The contrasting cultural influence of minorities in West Virginia is attributed to immigrant labor. This is apparent in the industrial northern panhandle and in the towns dominated by coal mining. Like much of Appalachia, West Virginia is predominantly white with the remaining minority population is virtually all African American. There are very small numbers of Hispanics, Asians, Pacific Islanders, and Native Americans.

Description of Brownfields

The site is also situated adjacent to the former Weirton Steel facility, also a large eyesore to the Weirton community. In certain locations in town the former stacks and steel production facilities tower over the neighborhoods, and a majority of homes in Weirton have a viewshed that contains rusting steel mills. The pervasive presence of the 1,993 acre former Weirton Steel properties constitutes 16% of the City of Weirton's total land at 12,326 acres.

The Lodge at The Williams, a Weirton landmark, benefitted from the **USEPA Targeted Brownfields Assessment (TBA) assistance program**. Professional Service Industries (PSI), Inc., was retained by TechLaw, Inc. to conduct a survey for asbestos-containing materials (ACM) in the Vacant Lodge, located at The Williams, 1000 Williams Drive, Weirton, WV 26062. The subject building is a 10,000-sq. ft., three-story, stone structure that was constructed in 1932. The purpose of the investigation and sampling was to provide information regarding the presence, condition, and estimated quantity of accessible ACMs located at the facility prior to its planned renovation. Exterior areas and the roof system were included in the scope of this survey. The asbestos inspection and sampling was conducted on September 24, 2015. A total of 67 samples were collected from 29 suspect asbestos-containing homogeneous materials during the survey. The samples were analyzed by polarized light microscopy (PLM).

Weirton is participating in the Brownfields, Abandoned & Dilapidated (BAD) Building Program of the BDC and Northern West Virginia Brownfields Assistance Center (NBAC). The BAD Buildings Program provides technical assistance to communities to address local brownfields and abandoned, vacant, or dilapidated buildings through a community engagement process of surveying, identifying, and prioritizing target

properties followed by reuse planning for specific high-value sites. The BAD Buildings Program will further the EPA Brownfields Cleanup grant.

Cumulative Environmental Issues

Three local counties (Brooke, Hancock, and Jefferson) are part of the metropolitan area ranked 10th most polluted in the nation, according to the findings contained in the American Lung Association's State of the Air 2015 report. Weirton is centrally-located between Brooke and Hancock counties in West Virginia. According to the report, the Pittsburgh, New Castle, Pa., and Weirton metropolitan area, which includes Jefferson, Hancock and Brooke counties, was classified as the year's 10th most polluted city in the country. The Pittsburgh metro area ranked ninth worst in year-round particle pollution, 10th worst in short-term particle pollution and 21st worst in ozone pollution.

Power plants, with potential adverse conditions, proximate to the Lodge include: W.H. Sammis Coal Plant (Stratton, OH), Beaver Valley Power Station (Hookstown, PA), and Bruce Mansfield Power Plant (Shippingport, PA).

Weirton and Steubenville's 8-hour average ozone concentration is 0.077 ppm, which fails to meet the national standard of 0.075 ppm. Weirton and Steubenville's ozone level of 0.077 ppm is worse than the national average of 0.07 ppm. Weirton and Steubenville's fine particulate matter concentration of 11.3 $\mu\text{g}/\text{m}^3$ meets the national standard of 12 $\mu\text{g}/\text{m}^3$. For coarse particulate matter, Weirton and Steubenville's annual concentration of 47 $\mu\text{g}/\text{m}^3$ fails to meet the national standard of 35 $\mu\text{g}/\text{m}^3$. Ranked by FindTheBest as Tier 14 out of 39 for fine particulate matter, Weirton and Steubenville's fine particulate matter concentration of 11.3 is among the worst when compared to the national average of 9.20 ppm. For coarse particulate matter, Weirton and Steubenville is classified by FindTheBest as Tier 28 out of 112 with a concentration of 47 ppm, which is better than the national average of 53 ppm. With a sulfur dioxide concentration of 117 ppb, Weirton and Steubenville's sulfur dioxide level fails to meet the national standard of 75 ppb. Classified by FindTheBest as Tier 64 out of 76, Weirton and Steubenville's sulfur dioxide concentration of 117 ppb is among the worst when compared to the national average of 20.00 ppb. (SOURCE: United States Environmental Protection Agency, "Air Quality Statistics by City 2012")

The brownfield sites in our region are linked to heavy metals, solvents, polycyclic aromatic hydrocarbons, plasticizers, and insecticides, all of which are suspected or recognized toxicants. Combined with other declining industries such as the glass and pottery industry with lead and PCB issues, our regional health has been compromised. The U.S. EPA, through its *Green Book* (July 2012), has also designated two of its national sulfur dioxide maintenance areas within the Weirton area (Brooke and Hancock counties). The nonattainment is specific to PM 2.5. If an area is designated as nonattainment it signifies to the public that the air is unhealthy to breathe.

According to the USEPA, Hancock and Brooke counties fall within Zone 1 for Radon, which means that homes in the Weirton area are predicted to have an average indoor radon screening above 4 pCi/L. Homes in this zone that test at 2-4 pCi/L are recommended to remediate to reduce the risk of lung cancer, which is the 2nd leading cause of lung cancer in the United States after cigarette smoking.

b. Impacts on Targeted Community [5 points]

In 2013, Weirton Medical Center (WMC) determined that its service area included the fourteen zip codes surrounding Weirton. 44% of all the patient discharges from WMC were from patients living within just the Weirton zip code, where only 6% of the total WMC service area's population lives. The WMC service area,

when compared individually to the states of West Virginia, Ohio, and Pennsylvania, and also the United States has a significantly higher rate of heart disease and pneumonia/influenza cases, according to the WVDHHR. In fact, in 2008 the WMC service area had higher, more negative, rates for causes of death in eleven different categories including: heart disease, cancer, strokes, chronic lower respiratory diseases, accidents, Alzheimer's disease, diabetes, influenza/pneumonia, liver diseases, suicide, and septicemia. In 2010, when the WMC service area was compared to the national average, the highest percentage of causes of death included heart disease (41% higher than the national average), chronic lower respiratory diseases (50% higher), septicemia (60% higher), cancer (30% higher), liver disease (45% higher), strokes (37% higher), and influenza/pneumonia (31% higher).

Disproportionately Impacted Communities. 1

Category	United States	West Virginia	Brooke-Hancock	Census Tract 212	Census Tract 213	Census Tract 317
% Poverty Rate	11.8%	12.8%	14.9%	26.9%	30.6%	20.0%
% 65+ in Age	13.7%	16.8%	19.0%	23.9%	20.8%	35.4%
Median HH Income	\$51,371	\$40,196	\$38,608	\$32,179	\$31,017	\$36,618

1 U.S. Census Bureau. American Factfinder, 2012.

Our targeted census tract population is proportionately poor, aged, and possesses limited buying power. Environmental justice is a concern because these census tracts 212, 213 (location of the subject site), and 317 are clustered adjacent to brownfields sites. With a high susceptibility to health threats and limited buying power, their exposure and ability to respond to a health care need has been jeopardized. These sensitive tracts are generating pollutants that are contributing to the region's high cancer rate (614.4 per 100,000). Direct contact or ingestion of contaminated soil particulates in these areas may also be contributing to the elevated cancer rates within the Region. Site usage includes mothballed freight terminals, potteries, steel mills, refineries, and gas stations. The majority of these sites have buildings that are aging and contain asbestos materials and lead-based paints and, due to their unsecured condition, residents access these structures. While all sensitive populations will benefit from this proposed assessment grant, our targeted census tracts will benefit the most by job creation as sites are redeveloped and contaminants removed. All priority census tracts exceed the national and state percentages in the "% 65+" group. In the case of census tract 317, the "% 65+" group is over twice as high as the national percentage (35.4% vs. 13.7%). There are unique concerns regarding the environment for an aging population. According to the Agency for Toxic Substances and Disease Registry ("Sensitive Populations and Chemical Exposure," 2009), (1) their immune systems are often weaker and (2) they tend to have more sensitive lungs, making fighting off health effects from breathing harder. All priority census tracts have a median household income lower than the national and state averages. In particular, census tract 213 has only 60% the buying power of the national average (\$31,017 vs. \$51,371). In addition, brownfields are a drain on the local economy and take a serious toll on community morale, especially in low-income neighborhoods that suffer from a disproportionate number of brownfield sites.

c. Financial Need [7 points]

i. Economic Conditions (3 points)

Weirton has a population of just 19,634 and has a long history with steel manufacturing and pottery industries. The City of Weirton is now working to address the impact of the decline of those industries. Weirton's median household income is significantly below the national average (\$38,432 compared to \$53,046). The city's poverty rate is 16%, while Hancock County is at 16.9%, both higher than the national

average. The unemployment rate is 7.4% in Hancock County, 6.4% in Brooke County, and 7.4% in Weirton, all of which are significantly higher than the national rate of 4.8%. A population already facing negative impacts from the decline of the steel and pottery industries has seen more hardship as a result of the recession in 2008 and continues to feel the impacts of both economic disruptions. Further job loss in the manufacturing sector is projected through 2020, although at a significantly slower rate. These high unemployment and poverty rates negatively impact public funding, as counties and municipalities collect less revenue. The County and state are managing with limited funding and have little capacity to provide discretionary funds for additional projects.

The BDC, the site owner, receives revenue from property sales and leases through its role as the Regional Economic Development Authority, which will allow for an investment into demolition and redevelopment activities. However, there is not enough revenue to tackle the environmental clean-up associated with the needed soil remediation and building demolition activities.

ii. Economic Effects of Brownfields (4 points)

The Lodge is among 8 brownfield sites identified in Weirton that is on the radar of the Brownfields Task Force administered by the Brooke-Hancock-Jefferson Metropolitan Planning Commission. Like the Lodge at The Williams, many of the brownfield sites are related to the significant decline in the steel and glass-making industries that have occurred over the past 20 years. The cumulative effects of the region's brownfields on the residents of Weirton have been devastating. Examples include: 1) a significant decline in tax revenue; 2) a stagnating economy with little or no investment in redevelopment; 3) an unemployment rate higher than the national average; and 4) a median household income of lower than the national average; 5) a population decline from a peak of 28,201 in 1960 to 19,634 today; and 6) a number of abandoned and dilapidated buildings (that will be inventoried and addressed under the BDC's BAD Building program).

Currently, most of the sites are abandoned or not used. The loss of industry and related jobs that once was associated with these sites, and the inability to return the sites to productive use due to their stigma as "brownfields", has contributed significantly to the economic decline and loss of population in the region. In addition, many of these sites are within or in close proximity to neighborhoods where residents can be exposed to contaminants associated with the former operations at the respective sites. It was in 1984, that the Lodge and its 4.2 acre parcel was subdivided from the Williams Country Club due to the cost to maintain and operate The Lodge and the contracting of the steel industry and population of Weirton. The Lodge found its way into the hands of private parties on two occasions, both not managing to curtail the deterioration of this once magnificent summer home for National Steel Chairman E.T. Weir and Weirton Steel President J.C. Williams. The members managed to purchase The Lodge parcel back from the most recent private owner, within the past few years, and joining the historic Lodge back to the greater historic Williams Golf and Country Club, before it went up for public auction in 2015.

2. Project Description and Feasibility of Success [30 points]

a. Project Description [15 points]

i. Existing Conditions (5 points)

DESCRIPTION OF STRUCTURES: The National Steel Corporation and its subsidiary the Weirton Steel Company had the mansion known as the Lodge built in 1931 and 1932. The Lodge, sitting on 4.2 acres overlooking the Ohio River, was built as a summer and weekend home for National Steel Chairman E.T. Weir, Weirton Steel President J.C. Williams, and their families. The Lodge was build just before the construction of the adjacent Williams Country Club house and golf course on over 150 acres. The Lodge's

construction was an estimated \$40,000 to \$50,000. Fred H. Clarke, a Steubenville, Ohio architect, designed the Lodge and Clubhouse. Clarke was prominent in the Steubenville area, and designed a number of banks, schools, and churches there between the 1910s and the 1940s. The Lodge was built in the French Eclectic style, shown in its masonry construction, hipped roof and dormers, centered front entry and symmetrical façade and main block, subordinate gables, massive chimneys, arched and rectangular window openings, front entry surround with columns and sidelights, and variegated slate roofing. The darkened sandstone with which the Lodge and Williams Country Club were built was salvaged from coke ovens that Weirton Steel owned near Brownsville, Pennsylvania. Workers brought the stone to Weirton on river barges, and lifted the stone up the steep hill to the construction sites by skip hoist. Weirton Steel had some of its skilled workmen construct the Lodge and the Country Club.

HISTORY OF THE SITE WITHIN THE CONTEXT OF WEIRTON: The approximately 4.2-acre subject Property, and purpose of this USEPA Cleanup application, is comprised of one area on the larger Williams Property. This 4.2 acre area is separate from the clubhouse and golf course. This 4.2 acre area is comprised of The Lodge, a pool and pool house, and garage/storage buildings, built in late 1931 and 1932, and once served as the summer and weekend home of E.T. Weir and J.C. Williams and their families. A TBA was awarded to assist the redevelopment of this site for purposes of collecting surface water, groundwater, surface soil, subsurface soil, air, and other samples at the Property in connection with EPA's performance of a Targeted Brownfields Site Assessment ("TBA") at the Property, as authorized by Section 104(k) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9604(k).

REUSE PLANS: This TBA was necessary to make way for this \$5.5 million investment and preservation of this historic structure, employment generator, and tourist/visitor attraction. The cleanup grant will make it possible to proceed with the work and maintain the jobs for 48 people currently employed during this transition period, and make it possible for the creation of an additional 12 employees after renovations are made to the facilities. Furthermore, this is a "Main Street Business" in the City of Weirton and Hancock County. It pays real estate and personal property taxes. It purchases goods and services throughout the community. It's a fundraising vehicle for local charities and nonprofit organizations like the United Way, Rotary Club, and Weirton Medical Center. The 48 people employed by the Williams contribute to an estimated annual payroll of \$1.2 million. The 10,000 rounds of golf played here a year generates over \$2.5 million annually for our local economy. Activities at this facility also contribute annually to local charities as well. This facility raises as much as \$500,000 annually for local charities. The total economic impact of this facility is \$4.2 million annually. After renovations, the economic impact of the facility to the local economy could be as high as \$6 million annually.

CONSISTENCY WITH OTHER ECONOMIC REDEVELOPMENT INITIATIVES: The BDC was recently awarded a multiyear, \$380,000 grant from the Claude W. Benedum Foundation to accelerate the redevelopment of former industrial sites in the Ohio River Valley and capitalize on current and future opportunities for brownfields redevelopment in decaying river towns presented by the development of the Marcellus and Utica Shales in West Virginia, Pennsylvania, and Ohio. The BDC is partnering with the Northern West Virginia Brownfields Assistance Center, which has developed a new regional Site-Ready Program to address brownfields sites using nearly \$380,000 in funding from the Benedum Foundation over a three-year period. The program, which emphasizes inter-state cooperation and collaboration, targets properties based on forecasted demand. Rather than wait until a prospect voices interest in a property and risk losing that opportunity because of the work to be done to prepare it for reuse, the Site-Ready Program identifies and prepares specific, high-value properties. The Benedum funding will be primarily used for site-

related costs, which include surveys, market planning, market assessments, and identification, and to complete environmental assessments for high-interest properties. There's also a community development component, which includes costs associated with identifying additional stakeholders and gathering community input on re-use options, as well as a regional networking/marketing initiative. As part of the program, the BDC will collaborate with its Pennsylvania counterparts, North Side Industrial Development Group and the Riverside Center for Innovation, on marketing, creative financing and grant writing as well as site-development activities in their four-county service area – Brooke and Hancock counties in West Virginia, Allegheny and Beaver counties in Pennsylvania.

ii. **Proposed Cleanup Plan (10 points)**

Based on the findings in the Phase 1 ESA, a TBA was awarded to retain TechLaw, Inc. who, in turn, hired Professional Service Industries (PSI), Inc. to conduct a survey for asbestos-containing materials (ACM) in the vacant Lodge. The subject building is a 10,000-sq. ft., three-story, stone structure that was constructed in 1932. The subject structure was un-occupied during the inspection. The purpose of the investigation and sampling was to provide information regarding the presence, condition, and estimated quantity of accessible ACMs located at the facility prior to its planned renovation. Exterior areas and the roof system were included in the scope of this survey. The asbestos inspection and sampling was conducted on September 24, 2015. A total of 67 samples were collected from 29 suspect asbestos-containing homogeneous materials during the survey. The samples were analyzed by polarized light microscopy (PLM). **Ten ACMs were identified during this investigation.**

The BDC plans to sell the property to a private developer that will use the Lodge as a public inn for overnight guests and public restaurant. Additional future uses for the Lodge include a wedding hall, banquet facility, and office space. These redevelopment plans include renovations to the Lodge that will require removal and disposal of ACM. The asbestos removal and renovation work will be performed in accordance with the requirements of West Virginia Codes 45CSR15 and 64CSR63. All required notifications will be made and the work will be performed by a West Virginia Bureau of Public Health licensed asbestos contractor.

Removing the ACM prior to renovating the building is required by West Virginia law. There are no other viable alternatives (other than no action, in which case the building could not be renovated and reused according to current plans). Again, removing the ACM prior to renovations is the only viable alternative. Given the short duration and permanent nature of the ACM removal project, the effects of climate change will not be a factor.

The BDC has a strategy in place to match the USEPA funding and leverage additional money for cleanup, planning, and development. Funding partners include private investors, the WV Development Office, the Benedum Foundation, and the Northern WV Brownfield Assistance Center. With the funding secured, including the anticipated award from the USEPA, the BDC will be able to complete the clean-up (in a safe and timely manner) and site development planning. The BDC would submit a Request for Qualifications in October 2016 and award a contract for remediation of the site in November 2016. Site remediation and cleanup will occur from December 2016 through March 2017. The BDC has leveraged \$70 million of investment from \$2.1 million in USEPA grants. The BDC has been involved in the redevelopment of almost 900 acres of brownfields, the attraction of over \$70 million in investment, the creation of approximately 1,200 jobs, and the recipient of \$2.1 million in grants to assist with brownfields redevelopment. During this same time period, the region has seen a drop in the unemployment rate by almost 4%; made possible, in large part, to the creation of available land, from reclaimed brownfields, for industry to expand or relocate

into West Virginia's northern panhandle. Concurrent with the cleanup activities, the BDC will also be performing a number of activities, including: soliciting public input, raising awareness of the importance of brownfields redevelopment, consensus building, meeting with local officials on a regular basis, redevelopment planning, and marketing the site.

b. Task Descriptions and Budget Table [10 points]

Task Descriptions

Task 1- Project Management: The total amount budgeted for this task is \$2,880. \$2,132 will be paid by the BDC as part of their cost share. The application requests \$2,880 (less than 5 percent) of the total funding budget to support project management and oversight by the BDC. Project manager (\$30/hour) of 36 hours and assistant project manager (\$30/hour) of 60 hours results in 96 hours of direct project work totaling \$2,880. The BDC will contribute in-kind staff time for the development of project materials and presentations and the provision of meeting space.

Task 2-Work Plan, Notifications, & Community Involvement: The total amount budgeted for this task is \$4,880. The entire amount will be paid by the BDC as part of our cost share. \$2,000 of the \$4,880 will be used to cover the cost of space to hold meetings in the community. The BDC is working directly with the Marland Heights Community and Weirton City Council on this project. The BDC will contribute cash and/or in kind services for the development of informational materials, lease space for the community meetings, and to assist with outreach and community development. The BDC will select a contractor through a competitive bid process, make all the appropriate notifications and announcements, and brief the BDC Board, Council, and Community regularly throughout the process. Cost share funds totaling \$4,880 will be utilized or the completion of this task.

Task 3-ACM Site Cleanup: Qualified contractors will be selected through a competitive bid process (RFP) to complete the remediation of the site. Remedial alternatives were developed as part of the Analysis of Brownfields Clean-up Alternatives (ABCA) attached to this application. The cleanup will include the removal/remediation of asbestos contaminated materials in the Lodge. The removed ACMs will be disposed at a permitted off-site facility. The grant funds requested for Task 3 Site Clean-up is \$44,800.

Task 4 Reuse Planning: The BDC will develop an Adaptive Use Plan for the Lodge that includes renovating the Lodge to achieve the maximum beneficial use. The BDC will also prepare a Master Development Plan for the entire 4.2 acres that encompass the Lodge and includes the accessory structures, built in the 1930s, that include the pool, pool house, and garage/storage buildings. This will include development of plans, conceptual drawings, identifying "green" building materials and technologies for use during redevelopment. \$5,000 of the \$7,500 to complete this task will be cost share. The cost breaks down as follows: master plan (24 hours = \$1,875); adaptive use study (24 hours = \$1,875); infrastructure needs assessment (24 hours = \$1,875); application of best practices for green building materials (24 hours = \$1,875).

Budget Table

Budget Categories	Project Tasks (\$) (programmatic costs only) ³				
(programmatic costs only)	[Task 1]	[Task 2]	[Task 3]	[Task 4]	Total
Personnel	\$2,880	\$2,880			

Fringe Benefits					
Travel ¹					
Equipment ²					
Supplies		\$2,000			
Contractual			\$44,800	\$7,500	
Other (specify) _____					
Total Federal Funding (not to exceed \$200,000)	\$748		\$44,800	\$2,500	\$48,048
Cost Share	\$2,132	\$4,880		\$5,000	\$12,012
Total Budget	\$2,880	\$4,880	\$44,800	\$7,500	\$60,060
<p>1 Travel to brownfields-related training conferences is an acceptable use of this grant.</p> <p>2 EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year. Items costing less than \$5,000 are considered supplies. Generally, equipment is not required for RLF grants.</p> <p>3 All costs estimates were provided through Civil and Environmental Consultants (CEC), a recognized top U.S. engineering firm specializing in environmental services, and the consultant who has completed the previous site assessment activities and also serves as the licensed Remediation Specialist required under the VRP.</p>					

c. Ability to Leverage [5 points]

For this project, the BDC worked with the WV Department of Environmental Protection (WVDEP) to receive a USEPA Targeted Brownfields Assessment assistance for an asbestos survey report. It was performed to fulfill tasking under United States Environmental Protection Agency (USEPA) Region III Hazardous Site Cleanup Division, Superfund Technical Assessment & Response Team– West (START) Contract EP-S3-15-03, Technical Direction Document (TDD) No. TL04-15-08-001.

The BDC is working with a private entity to secure an investment of over \$1,000,000 into the Lodge; provided the ACM's are removed. This investment will secure the future use of the Lodge as a public inn for overnight guests and public restaurant; in addition to additional future uses including a wedding hall, banquet facility, and office space. The BDC has already secured \$12,500 from the Northern WV Brownfields Assistance Center (NBAC) through the Site Ready Program to conduct market analysis and reuse option feasibility studies. A letter of agreement for this grant is included in Attachment D. The NBAC has committed to providing an additional 100 hours of in-kind service valued at \$4,000 in technical assistance over the full grant period. The Brooke-Hancock Regional Planning and Development Council has also committed to an in-kind service of 60 staff hours valued at \$2,100. This service will include assistance with community involvement, market analysis, and reuse planning.

The BDC will continue to collaborate and leverage funding for the Lodge, despite our limited resources. The BDC has a strong history of leveraging funds on brownfield projects. For example, the BDC has leveraged \$200,000 to purchase a former steel plant, to obtain \$4.4 million of private investment. Collectively, the first four development projects the BDC has undertaken (former Wheeling Corrugating Steel Plant, former Taylor, Smith & Taylor Pottery site, former Memorial Stadium, and former Jimmy Carey Stadium) have leveraged a total \$57 of public and private investment for every \$1 invested by the BDC. In actual dollars, the BDC has spent \$750,000 to acquire four properties while attracting \$23,783,806 to improve these same four properties due to previous USEPA brownfields assessment and cleanup grants.

3. Community Engagement and Partnerships [15 points]

a. Plan for Involving Targeted Community & Other Stakeholders; and Communicating Project Progress [5 points]

The community of Weirton has been a part of the Brooke-Hancock Brownfields Task Force (BHBTF), a group comprised of local city officials, community members, business people, site-adjacent residents, and civic leaders. They formed in 20XX. The BDC attends and participates in every BHBTF monthly meeting, shares its activities related to site redevelopment, and utilizes a feedback/concerns loop with committee members. Through this group the BDC is able to maintain full transparency on this project. The BHBTF has been a key partner in engaging the community of Weirton. This task force has successfully guided the redevelopment of other sites, such as Three Springs Business Park, Half Moon Industrial Park, a variety abandoned gas stations, and not the former Jimmy Carey Stadium. The BHBTF was a key driver in the public comment process, helping to invite the community to public meetings and to share comments, and sharing information on the widely used community Facebook page. Local media representatives also frequently attend the committee meetings and report to the greater community on its progress. In addition, media articles will be published in local and area newspapers including The Review, Hancock County Courier, and Weirton Daily Times.

Throughout the cleanup of the Site, the BDC will continue fostering and maintaining a strong relationship with the Northern WV Brownfields Assistance Center (NBAC). These relationships continue to grow through work on the several other brownfields projects. The NBAC has been an integral partner in site planning and research for each BDC project.

Site cleanup progress on the Site will be reported to the community through the BHBTF meetings on a monthly basis. All progress and news updates will be made available online at the BDC's website including links to online press releases and news stories. The BDC will also use its existing presence on social media to communicate project updates and meeting reminders with local citizens.

The BDC will continue to engage the BHBTF and the broader Weirton, as well as foster partnerships with NBAC and other service providers. Specifically, the BDC has committed to the following community involvement strategy:

- *Monthly progress meetings with the BHBTF*
- *One meeting to present the clean-up method (based on completed Analysis of Brownfields Clean-up Alternatives) once the Clean-up grant is awarded*
- *One meeting to share the news after successful cleanup completion and site acquisition*
- *Meeting to obtain feedback on the site master plan by developer*
- *One annual meeting to celebrate our success*
- *Bi-Monthly Facebook updates to the BDC website to share project progress*
- *Coordination with the local paper to have at least one story per month on the project*
- *Three presentations per year (nine over the course of the grant) at local civic organizations*

- A monthly updated project newsletter available at City Hall, and the Public Library
- A Frequently Asked Questions (FAQ) 1-pager will be produced to help answer the most common questions about the project.

The only commonly spoken language in the area is English and all community engagement will be conducted in English. There are no known potential language barriers in the communities impacted by this project; however, the BDC will gladly provide a translated version of any requested project document upon request.

b. Partnerships with Government Agencies [5 points]

Partnerships with Government Agencies			
Name/Title	Organization	Activities	Telephone No.
Patricia Hickman Director	WVDEP- Division of Land Restoration	State Brownfields Authority	304-926-0499
Michael Paprocki Director	Brooke-Hancock Regional Planning & Development Council	Regional Brownfields Partner	304-797-9666

The BDC has a strong existing partnership with the WV Department of Environmental Protection. The WVDEP provided technical expertise and guidance to the BDC during purchase negotiations with the previous site property owners. The BDC is also working in close partnership with the WVDEP's Department of Land Revitalization and Division of Air Quality in order to comply with all air and water quality standards and regulations relating to environmental cleanup activities. In addition to this existing partnership, the BDC will engage with the WV Department of Health and Human Resources to provide updates on the status of site cleanup and redevelopment. The WVDHHR will be engaged because they have a stake in seeing a local blighted property in an underserved community restored to productive use and a potential health and human safety hazard removed from the community. The WVDHHR will support this project through a variety of services including providing known health risks in the community, information on sensitive populations, and any situations of identified risks to human health. Further, the WVDHHR will play a crucial role by helping inform the community of the activities to be undertaken by the BDC to minimize and prevent exposure to potentially hazardous substances during site remediation.

The BHRPDC will provide technical support by assisting with community information meetings for project progress updates, dissemination of information to educate the public on brownfields development, and marketing.

c. Partnerships with Community Organizations [5 points]

Organization	Contact	Description & Role in Project
Northern WV Brownfields Assistance Center	Patrick Kirby, Director Patrick.kirby@mail.wvu.edu 304-293-6984	NWVBAC promotes economic development and environmental and public health protection through innovative redevelopment of brownfields. NWVBAC will provide assistance and expertise on assessment and revitalization to the Village over

		the three-year grant period.
Weirton Area Chamber of Commerce	Brenda Mull, President brenda@weirtonchamber.com 304-748-7212	Provide administrative support and raise public awareness of the site at their regular meetings.
Marland Heights Community	Iris Himmelrick 304-670-6210	Provide space for public meetings and inform public of our intent to remove hazardous substances onsite and assist with the adaptive use of the Lodge.
Neighborhood Watch		Inform the public of our intent to remove hazardous substances onsite and assist with the adaptive use of the Lodge.

The BDC has a strong existing partnership with the NBAC, which has supported the redevelopment of multiple sites through several of its privately funded grant programs. The FOCUS WV program provided funding and technical assistance for initial site planning and visioning, the WV Redevelopment Collaborative (WVRC) supported previous projects by teaming the BDC with experts to identify and solve key site issues, and the WVRC helped the BDC to focus on developing marketing and financing strategies for sites. Finally, the NBAC's Site Ready Program helped the BDC to conduct market and feasibility studies.

4. Project Benefits [20 points]

a. Health and/or Welfare and Environmental Benefits [10 points]

i. Health and/or Welfare Benefits (5 points)

After clean-up, redevelopment of the Lodge will improve the health and welfare of residents in Weirton while removing and resolving the mitigation of asbestos contaminants. In addition to this direct benefit, the cleanup and eventual redevelopment of this site will strengthen the social and public health of the Weirton and Brooke and Hancock counties. These benefits include a reduction in blight, an improvement in quality of life for adjacent residents, and an improvement in the reputation and perception of the City of Weirton. Environmental benefits include outcomes such land remediated through removal and stabilization of site contaminants and improved air, surface water, groundwater, and soil quality in and around the site.

All cleanup activities will operate under health and safety plans and meet all health and safety regulations. The BDC will work with the WV Department of Health and Human Resources to ensure safety standards are met. If appropriate, signs will be erected, dust and airborne particles will be controlled, flag persons will be utilized to protect the public, and fencing will be installed or maintained if already in place.

Finally, the BDC will incorporate equitable development principles into the planned reuse of the site. For example, no nearby residents will be displaced due to the reuse of the site. Re-use options which retain and enhance local businesses will be pursued. On-site green space will be considered to incorporate the

site into the existing residential neighborhood. Site redevelopment will coordinate with existing local and regional Comprehensive Plans in order to maximize the impact of the re-use of the site.

Our targeted census tract population is proportionately poor, aged and possesses limited buying power. Environmental justice is a concern because the Lodge is in census tract 213 with a poverty rate of approximately 30%; which is substantially higher than the poverty rates in the Census tracts to the north and south and over twice the poverty rate of the United States and West Virginia. With a high susceptibility to health threats and limited buying power, the residents' exposure and ability to respond to a health care need has been jeopardized. All priority census tracts in Brooke and Hancock counties exceed the national and state percentages in the "% 65+" group. In the case of census tract 213, the "% 65+" group is over 50% higher than the national percentage (20.8% vs. 13.7%). There are unique concerns regarding the environment for an aging population. According to the Agency for Toxic Substances and Disease Registry ("Sensitive Populations and Chemical Exposure," 2009), (1) their immune systems are often weaker and (2) they tend to have more sensitive lungs, making fighting off health effects from breathing harder. All priority census tracts have a median household income lower than the national and state averages. In addition, brownfields are a drain on the local economy and take a serious toll on community morale, especially in low-income neighborhoods that suffer from a disproportionate number of brownfield sites.

ii. Environmental Benefits (5 points)

Through identification of actual environmental impacts present on properties within the target area, steps can then be taken to properly manage these contaminants, including identification of exposure pathways and quantifying risks posed to any identified sensitive populations or other receptors. Properties found to contain toxic levels of contaminants can then be properly managed to control unauthorized access, reducing further exposure of unhealthy contaminants to local community members. While contaminants can migrate via several mechanisms, groundwater contamination is a serious environmental threat from these brownfield sites, due to their location along the Ohio River, the region's sole water supply source. Identification and management of contaminants that could impact this critical water source will reduce the potential threat of contamination and associated environmental and economic impacts.

b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse [5 points]

i. Policies, Planning, or Other Tools (2 points)

The Brooke-Hancock, West Virginia, Regional Investment Strategy (July 2011), an adopted document of the BDC Board of Directors, provides an infrastructure/sustainable guideline for this cleanup grant. The Regional Investment Strategy is consistent with the livability principles of the U.S. Environmental Protection Agency, the U.S. Department of Transportation, and the U.S. Department of Housing and Urban Development. Examples pertinent to this project are as follows:

- Low Impact Development (LID) Techniques. The West Virginia University County Extension Office for Brooke and Hancock County provides workshops on these techniques. The Extension Office wishes to expand their program to the BDC's brownfields sites. LID cost savings are very site specific; however, the cost saving calculation will include lower lifetime costs, reduced off-site costs, and a more functional use of the site. LID is an approach to land development (or re-development) that works with nature to manage storm water as close to its source as possible. The BDC will work with WVU Extension to apply these principles to the proposed adaptive use of the Lodge.
- Use of Existing Infrastructure. The Lodge is adjacent to existing water, sewer, and roadway facilities. By redeveloping this site and not expanding infrastructure needs, energy consumption has been minimized while the generation of air pollutant emissions, including greenhouse gases, has been

minimized in a USEPA non-attainment region. Through adherence to the LEED Guidelines for Construction and Demolition (C&D), the BDC has already applied this technique at its brownfields demolition at the former TS&T Pottery site. This approach has incorporated a sustainable and equitable cleanup and reuse approach. **Over 150 tons of C&D were retained on site at a cost saving of \$15,000.**

ii. Integrating Equitable Development or Livability Principles (3 points)

The BDC is committed to equitable development and livability principles. The development of all of our brownfield sites includes a strategy to: (1) site acquisition and industry recruitment to those sites that are proximate to existing population centers as well as improving housing near our project sites—the BDC is working with Wells Fargo, Huntington Bank, and Hancock County Savings Bank to take title to foreclosed properties near brownfields; (2) linking people in the community to regional employment opportunities; (3) promoting equitable public investment in underserved economically distressed areas; and (4) working with local and state officials to promote healthy, stable, and livable communities that business and industry will choose to locate.

The BDC has already applied this technique at the former TS&T Pottery site in Chester, WV. This approach has incorporated a sustainable and equitable cleanup and reuse approach. Over 150 tons of C&D were retained on site at a cost saving of \$15,000. The BDC pledges to follow the LEED 98% guideline at the site. C&D materials often contain bulky, heavy materials, such as concrete, wood, metals, glass, and salvaged building components. Reducing and recycling C&D materials conserves natural resources and landfill space, reduces the environmental impact of producing new materials, creates jobs, and can reduce overall building project expenses through avoided purchase/disposal costs. As illustrated through BDC's prior clean-up work adhering to green remediation guidelines, the preferred method for clean-up at the riverbank involves covering the soil in place which reduces the impact of trucking and disposing of the material offsite and reduces erosion of sediments during remediation activities.

c. Economic and Community Benefits (long-term benefits) [5 points]

i. Economic or Other Benefits (3 points)

This USEPA TBA is necessary to make way for this \$4 million investment and preservation of this historic landmark, employment generator, and tourist/visitor attraction. The TBA will maintain the jobs for 48 people currently employed during this transition period, and make it possible for the creation of an additional 12 employees after renovations are made to the facilities. Furthermore, this is a "Main Street Business" in the City of Weirton and Hancock County. It pays real estate and personal property taxes. It purchases goods and services throughout the community. It's a fundraising vehicle for local charities and nonprofit organizations like the United Way, Rotary Club, and Weirton Medical Center.

Strategically located in downtown Weirton on the hilltop overlooking the Ohio River, this facility is recognized by Weirton as a gathering point for civic life and community as well as a priority brownfield site and its continued use is supported by a cooperative property owner, the BDC, and City of Weirton. The site is located immediately adjacent to ArcelorMittal Steel (formerly Weirton Steel) to the east and the neighborhood of Marland Heights to the west. Marland Heights is primarily made up of medium sized (three or four bedroom) to small (studio to two bedroom) single-family homes and small apartment buildings. Most of the residential real estate is occupied by a mixture of owners and renters. Many of the residences in the Marland Heights neighborhood are older, well-established, built between 1940 and 1969. A number of residences were also built before 1940. Real estate vacancies in Marland Heights are 5.9%, which is lower

than one will find in 70.5% of American neighborhoods. Demand for real estate in Marland Heights is above average for the U.S., and may signal some demand for either price increases or new construction of residential product for this neighborhood.

The outlook for investment is strong in the northern panhandle in general and the City of Weirton in particular:

- **Brooke and Hancock counties have seen almost \$150 million of investment over the past five years.** *This investment reaches outward from Weirton to Chester to the north and Beech Bottom to the south. Investments in Center Point Terminal (Weirton), Rue21 (Weirton), Three Springs (Weirton), Trimodal Terminal (Follansbee), Eagle Manufacturing (Wellsburg), former Wheeling Corrugating Plant (Beech Bottom), Chrysler (Newell), and Layfields (Colliers) reflect the importance of collaboration in continuing to grow our economy, expand the tax base, and bring in jobs.*
- **The activity over the past five years is related to energy/shale, value-added metals (Jupiter Aluminum and Wheeling Nisshin), chemicals, and warehouse/distribution (Rue21).** *2015 will be more the same. We are showing properties weekly to prospects from China, South America, Canada, and Europe. We are showing properties nationally to companies from the south, Midwest, and central US.*
- **Southwestern Energy Corp. purchased Chesapeake Energy Corp. assets for \$5.4 billion.** *They are deploying 4-6 rigs in 2015 and 11 rigs by 2017. This will add 256 operated and producing horizontal wells and 179 non-operated horizontal wells.*

ii. Job Creation Potential: Partnerships with Workforce Development Programs (2 Points)

Contracted work for cleanup work will be awarded to reputable, experienced environmental firms through a competitive bid process that will include opportunities for small businesses to compete. While WV has no EPA brownfields job training grants active at this time, the West Virginia Development Office and its Workforce Development Program is active in providing job training and the BDC will foster its partnership with this program to bring available job training and creation opportunities to the BDC related to this project. Additionally, the BDC has been working with the Project BEST. The BDC has already awarded 3 construction projects to Project BEST (Rue21, Barney's Bakery, and Chrysler). Local hiring and procurement related to this grant will follow a certified project program/ memorandum of understanding standard for "Project BEST." Chartered as a non-profit corporation in 1982, it is a construction industry labor-management organization. It encompasses over five hundred (500) contractors and six thousand (6,000) building trades' craftsman and apprentices serving the Upper Ohio Valley region. Its primary purpose is to promote jobs for its participants by providing quality and safety conscious craftsmen and on-time completion of projects within budget to its commercial and industrial customers and encouraging economic development throughout the region. In 2012, Project BEST initiated an apprentice program in brownfield site review and redevelopment. These graduating apprentice workers have worked on two brownfield sites in Brooke and Hancock counties. The Northern Panhandle Workforce Investment Board (NPWIB), one of seven regional boards in West Virginia, has a Career Center in the Brooke-Hancock Region and is designed to help businesses find qualified workers and help job seekers obtain employment and training services as a brownfield technician. In 2012, NPWIB

placed 10 brownfield apprentices into regional environmental jobs. In 2012, NPWIB placed 85 workers into gas drilling positions.

5. Programmatic Capability and Past Performance [20 Points]

a. Programmatic Capability [12 points]

The BDC was formed in 1993 and chartered as a 501-C3 (private, not for profit) organization. The BDC is the designated economic development organization for Brooke and Hancock counties. The BDC is dedicated to creating jobs and encouraging private investment in the northern panhandle. The BDC gets its financial support from the West Virginia Development Office, West Virginia Economic Development Authority, USEDA, USEPA, Benedum Foundation, private investors, Brooke County Commission, Hancock County Commission, and the municipal governments of Bethany, Beech Bottom, Weirton, New Cumberland, and Chester. The BDC will retain its existing and successful environmental grant team. The project director of this EPA Cleanup Grant for the Lodge site will be Patrick Ford, the BDC Executive Director. The BDC has three full-time staff persons. Mr. Ford is the Executive Director and Project Manager of the BDC. Mr. Ford has 25 years of experience in project management, land development, and economic and community development. Ford has worked as a development executive in West Virginia, Pennsylvania, Virginia, Maryland, and Florida. Ford holds a Bachelor's Degree in City Planning and Master's Degree in Planning from the University of Virginia, is a graduate of Leadership West Virginia, and was selected as one of "Who's Who Top Entrepreneurs in West Virginia" by the *West Virginia Business Journal*

Marvin Six is the Assistant Director and Assistant Project Manager of the BDC. Mr. Six has thirty five years of experience in corporate management and fifteen years in economic and community development in West Virginia. Mr. Six holds a Bachelor's Degree in Business Management and Master's Degree in Industrial Safety from West Virginia University, and is a graduate of the University of Pittsburgh Katz Graduate School Entrepreneurial Fellows Center.

Amber Nest is the Office Manager of the BDC. Ms. Nest has worked simultaneously with the Business Development Corporation and the Weirton Chamber of Commerce for over 6 years handling day-to-day operations and finances for both organizations. Ms. Nest completed the Dale Carnegie Course Effective Communications and Human Relations in 2007. In addition, she obtained an Associate's Degree, with Honors, in Business Management emphasizing Marketing from The Eastern Gateway Community College. Ms. Nest is currently enrolled at West Liberty University to complete her Bachelor's Degree.

Mr. Ford and Mr. Six are cross-trained and have over sixty years of experience in project management, construction management, land development, and economic and community development for a variety of residential, commercial, industrial, public, and mixed use projects. Their collective experience allows them to seamlessly share responsibility for project management, land development, business recruitment, business retention, deal structuring, finance structuring, marketing, and consensus building.

Beyond the skill sets possessed by the staff and board of the BDC, the BDC regularly retains the skills of professionals for a variety of contractual services for project development, civil and structural engineering, site assessment, planning, accounting, and contract law. These services, including the hiring of staff, are handled via standard procurement and thorough vetting procedures. The BDC has retained a number of professionals over the years via standard procurement procedures. Summarily, the procedures include soliciting statements of qualifications and price proposals that are reviewed by the staff and executive board of the BDC (which includes a balance of professionals from the private and public sectors).

If the BDC were to contract necessary expertise, beyond that which has been currently retained, it would contract such professionals via standard procurement procedures which meet all state and federal guidelines and have been employed in the past. Summarily, the procedures will include soliciting statements of qualifications and price proposals that will be reviewed by the staff and executive board of the BDC. The BDC will engage a West Virginia Licensed Remediation Specialist (LRS) to perform the specific assessment work on the Lodge project under supervision from the WVDEP.

b. Audit Findings [2 points]

The BDC has not had any adverse audit findings. On an annual basis, the BDC obtains an independent audit to validate its financial affairs. The BDC is in compliance with the OMB Circular A-133 which requires recipients that expend \$300,000 or more in total Federal funds. For the 2012 USEPA cleanup grant, quarterly reports were filed on or before due dates and no ineligible costs were noted. The BDC and its officers, on a monthly basis, formally review and approve vouchers and expenses.

c. Past Performance and Accomplishments [6 points]

i. Currently or Has Ever Received an EPA Brownfields Grant [6 points]

1. Compliance with Grant Requirements (3 points)

The BDC was awarded a USEPA cleanup grant in the amount of \$200,000 in 2012 for the TS&T site. The BDC was in full compliance with this grant's work plan, schedule, and terms and conditions. Sufficient progress on this grant was made through the cleanup, remediation, and environmental controls placed on the site. While the grant was originally planned for a three year time period, the work was completed within one year by special request from the EPA. Grant dollars for the program have been fully expended and the grant has been closed out. Necessary tasks for the grant involved application coordination, work program coordination, acquisition of a cooperative agreement, preparation of an initial project, Quality Assurance Project Plan, submittal of annual QAPP updates, preparation and submittal of quarterly reports and financial reports, maintenance of the Cleanup and Redevelopment Exchange System (ACRES) data base and project close-out. All of these tasks were completed in a timely and acceptable manner.

The BDC was the recipient of 3 Targeted Brownfields Assessment (TBA) grants for 3 specific properties in 2014. The BDC was awarded \$225,000 for the former Wheeling Corrugating Plant property located in Beech Bottom, WV; \$70,000 for the former Brooke Glass site in Wellsburg; and \$90,000 for the Jimmy Carey Stadium located in Weirton, WV. The BDC was awarded a USEPA Cleanup grant for Wheeling Corrugating Plant and Brooke Glass in 2015. The grant period for these two cleanup grants is October 1, 2015 to November 30, 2018. We are currently preparing an RFP to solicit contractors to perform the cleanup work. Work will be completed in the grant period. The BDC was also awarded \$70,000 through a 2014 USEPA Site-specific Assessment grant for the TS&T riverbank property in 2014. The assessment work has been completed. The BDC also received a USEPA Cleanup grant for the TS&T riverbank in 2015. The grant period for this cleanup grant is October 1, 2015 to November 30, 2018. We are currently working with the WVDEP to develop an acceptable approach to remediate the riverbank while preserving the hillside on the river's edge. Once an approach is approved by WVDEP, the BDC will solicit contractors to perform the cleanup work. The work will be completed in the grant period.

2. Accomplishments (3 points)

The USEPA produced a podcast that was aired at the National Brownfields Conference this year and will be available for viewing nationally. The video captured the approach used by the BDC to identify, acquire,

assess, remediate, and develop brownfields with layered partnerships and resources. The video illustrated the BDC approach as a model for other communities to adopt nationally.

The message in the video captured and illustrated the importance of each person's perspective. The following is a quote from the USEPA:

"The brownfields progress at the BDC definitely tells a story of layered partnerships and building expertise to advance these complicated redevelopment projects...The videos will be useful in educating specific decision makers... including folks like philanthropies... (demonstrating how any scale investments can advance brownfields), public funders at all levels, local elected decision makers, state government, private companies, etc. This message has lots of audiences...What has been compelling to my [USEPA] decision makers is how the partnerships and development strategies have accelerated development (sometimes, folks believe lots of players slow down development), and also increased investment. There's a great quote about one of Pat's brownfields something like... We've been through 5 governors on this project...The real message was that the local folks had to get it together first, then the state and fed could invest... Locals first."

One specific example, highlighted in the podcast, of a significant BDC accomplishment is the cleanup and redevelopment of the former TS&T site in Chester, WV. Four West Virginia Governors promised that the site would be demolished and redeveloped; but the fifth Governor, 30 years after the plant's closing, cleaned and razed the decaying former pottery site on the Ohio River. The project achieved the following outcomes: 1) The original \$5,000 investment leveraged over \$1,300,000 from 14 funding streams to remediate the site; 2) Almost two dozen community meetings were held, including regular project updates; 3) The project was one of four projects highlighted in the Claude Worthington Benedum Foundation Annual Report titled Building Stronger Communities; 4) The project also won a competitive grant from the West Virginia Redevelopment Collaborative from West Virginia University and the Benedum Foundation; 5) Necessary tasks for the grant involved application coordination, work program coordination, acquisition of a cooperative agreement, preparation of an initial project, Quality Assurance Project Plan, submittal of annual QAPP updates, preparation and submittal of quarterly reports and financial reports, maintenance of the Cleanup and Redevelopment Exchange System (ACRES) data base and project close-out.

V.C. Other Factors

See attached file: Other Factors Checklist.doc

V.D. Proposal Checklist for Cleanup Grants.

Before you submit your proposal(s) for a cleanup grant, please ensure the following documents are included in your package submitted to the EPA's contractor.

See attached file: Proposal Checklist for Cleanup Grants.doc

THRESHOLD CRITERIA: Attachment A

1. Applicant Eligibility

a. Eligible Entity

The Business Development Corporation of the Northern Panhandle (hereafter, "BDC") is a government entity created by the State of West Virginia Code (WV § 7-12) and qualifies as an eligible entity as a land clearance authority. The BDC has the authority to enter into contracts with the USEPA to carry out Brownfield projects.

b. Site Ownership

The Business Development Corporation of the Northern Panhandle (BDC) possesses fee simple title to the 4.2-acre Lodge property (hereinafter referred to as the "Site"). The property was purchased by the BDC on _____. The deed is recorded at the Hancock County Courthouse in New Cumberland, West Virginia and can be provided upon request. The BDC will, at a minimum, remain the sole owner of the property until all of the cleanup work and other obligations funded by the grant have been completed and the grant is closed out.

2. Letter from the State or Tribal Environmental Authority

See attached Letter from the State Environmental Authority, the West Virginia Department of Environmental Protection (WVDEP) dated December X, 2015.

3. Site Eligibility and Property Ownership Eligibility

a. Basic Site Information

Site Name: The Lodge

Address: 1000 Williams Drive, Weirton, WV 26062

Current Owner: Business Development Corporation of the Northern Panhandle

Site Acquisition:

b. Status and History of Contamination at the Site

The approximately 4.2-acre subject property is comprised of two areas on the larger Williams Golf & Country Club property that is located in a residential and industrial area of Weirton, West Virginia. There are three buildings currently located at the property on the Lodge Parcel including the Lodge, Pool House, and Garage/Storage Building. The structures were built in the 1930s and are constructed of stone and bricks with slate roofs. A Storage Tank Area is also located on the subject property consisting of two aboveground storage tanks (ASTs) and one underground storage tank (UST). The ASTs are approximately 2 years old and the UST has been out of service for approximately 5 years.

The property was developed during the 1930s as a golf course for Weirton Steel. According to the Williams Country Club website, the Country Club was maintained by Weirton Steel until December 1984 when the Williams Country Club membership took over. The current property owner, operating as

Williams Golf & Country Club, purchased the property in May 2015. Prior to development as a golf course, the property and adjoining golf course was used as the Griffith Farm.

Known or Suspected Recognized Environmental Conditions

A recognized environmental condition (REC) is the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property 1) due to any release to the environment, 2) under conditions indicative of a release to the environment, or 3) under conditions that pose a material threat of a future release to the environment. *De minimis* conditions are not RECs.

The following known or suspected RECs were identified during this Phase I ESA.

▮ An underground storage tank (UST) is located at the property. The UST is registered with the WVDEP as a 1,000-gallon gasoline tank. According to maintenance staff, the UST was drained approximately 5 years ago and is no longer used. Releases of petroleum products to the environment on the property from the UST are considered likely based upon the nature of UST systems and our experience at similar sites. Therefore, this condition is considered a REC.

▮ The property was listed on the environmental database report as a RCRA non-generator of hazardous waste. Prior to being classified a non-generator, the facility was a conditionally-exempt small quantity generator of hazardous waste. There were no records of violations identified in association with waste management at the site. Therefore, based upon the current non-generation, historical very low quantity of hazardous waste generated, and no records of violations, impacts to the property from releases of hazardous substances or petroleum products associated with hazardous waste management are unlikely and this condition is not considered a REC.

▮ Two 500-gallon above ground storage tanks (ASTs) are located near the UST in the Storage Tank Area on the property. The ASTs contain gasoline and diesel fuel. Minor staining was observed on the asphalt surface near the tanks and dispensers that appears to be associated with fueling. The small stained areas were localized on the asphalt surface and were not observed to extend to the ground surface or the environment on the property. Therefore, this is considered to represent a *de minimis* condition (see below) and is not considered a REC.

▮ Non-adjointing industrial properties, a former slag dump, and large ASTs are located near the property to the north and east. These facilities are located at lower elevations and based upon local topography and hydrologic characteristics, including the relative location of Harmon Creek, the upper-most water bearing zone underlying these nonadjoining sites would likely flow toward the south and releases of hazardous substances or petroleum products would not be expected to impact the subject property. Therefore, this condition is not considered a REC.

De Minimis Conditions

A *de minimis* condition is a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be *de minimis* are not recognized environmental conditions.

The following *de minimis* condition was identified during this Phase I ESA.

▮ Minor staining was observed near the ASTs and dispensers on the subject property. The staining is localized on asphalt and concrete surfaces and was not observed to extend to the ground surface or

discharge to any drains. The staining was typical of vehicle parking type staining and is assumed to be associated with small drips during fueling and motor oil drips. This condition would not be expected to impact the environment or typically be the subject of agency enforcement action.

c. Sites Ineligible for Funding

- i) The Lodge property is not listed or proposed for listing on the National Priorities List.
- ii) The Lodge property is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.
- iii) The Lodge property is not subject to the jurisdiction, custody, or control of the United States government.

d. Sites Requiring a Property-Specific Determination

A site specific determination is not necessary for this site as it does not meet the special class category as described in the Cleanup Grant guidelines.

e. Environmental Assessment Required for Cleanup Proposals

A Phase I Environmental Site Assessment (Phase I ESA) was completed for the Site in November 3, 2015 by American Geosciences, Inc. of Murrysville, PA. An Asbestos Survey Report was prepared by TechLaw of Wheeling, WV on November 6, 2015.

Property Ownership Eligibility:

f. CERCLA §107 Liability

The BDC is not potentially liable for contamination at the site under CERCLA §107 because the BDC meets the criteria of a Bona Fide Prospective Purchaser (BFPP). The BDC performed "All Appropriate Inquiry" before acquiring the property. The BDC also meets the no affiliation demonstration criteria, is complying with any existing or future land use and institutional controls, has followed the reasonable steps criteria, and is fully cooperating with EPA and all other appropriate regulatory agencies and providing assistance and access as requested. The BDC is committed to complying with information requests and administrative subpoenas and has provided, and will continue to provide, legal required notices. As a BFPP, the BDC is an eligible property owner and meets BFPP requirements.

g. Enforcement Actions or Other Actions

- i) The site is not listed or proposed for listing on the National Priorities List.
- ii) The site is not currently subject to any unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to/entered into by parties under CERCLA.
- iii) The Site is not subject to the jurisdiction, custody, or control of the United States government. There are no on-going or anticipated enforcement actions from federal, state, or local authorities.

h. Information on Liability and Defenses/Protections

i) Information on the Property Acquisition

The site was purchased on _____ by purchase from Mr. James Markovitz, which made the BDC the sole owner of the property.

ii) Timing and/or Contribution Toward Hazardous Substances Disposal

All disposal of hazardous substances at the site occurred before the BDC acquired the property. The BDC did not cause or contribute to any release of hazardous substances at the site. The BDC has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances at the site.

iii) Pre-Purchase Inquiry

A Phase I Environmental Site Assessment in compliance with ASTM E1527-13 was completed for the Site on behalf of Williams Golf & Country Club, Inc. and the BDC on November 3, 2015 (as defined in 40 CFR § 312.10), by American Geosciences, Inc. of Murrysville, PA, for the purpose of performing due diligence prior to the _____ purchase of the property in order to take advantage of the bona fide prospective purchaser provision.

iv) Post-Acquisition Uses

The BDC has been the only user of the site since the purchase of the property. There have been no uses of the site since acquisition.

v) Continuing Obligations²

The BDC will limit access to the Site via fencing during the remediation. Further, the BDC will follow all standards and regulations and coordinate with all appropriate environmental regulatory agencies to stop any continuing release, prevent any future release, and minimize and prevent exposure to previously released hazardous substances for both cleanup workers and adjacent residents during site cleanup. The BDC will comply with all land-use restrictions and institutional controls, assist and cooperate with those performing the cleanup, and provide access to the Site. The BDC will also comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and provide all legally required notices.

i. Property Ownership Eligibility -Petroleum Sites

Site is not a petroleum site; disregard this section based on guidelines.

4. Cleanup Authority and Oversight Structure

- a. Access to adjacent property is not expected to be needed to implement the proposed cleanup activities.

5. Statutory Cost Share (See also Section IV.I on leveraging)

i) The BDC is committed to providing the 20% cost share associated with the project when the Brownfields Cleanup Grant is awarded by the EPA. The BDC will satisfy the cost share through a combination of in-kind services (materials used during the outreach and reuse planning tasks) and cash toward contractual services for the cleanup and remediation of the site.

ii) No Hardship Waiver is being requested.

6. Community Notification

The community of Weirton, West Virginia received notification through an ad placed in the Weirton Daily Times on November xx and xx, 2015. This notification stated that a copy of the draft proposal was located at the BDC Office (3174 Pennsylvania Ave, Weirton), BHJ Office (124 North 4th Street, Steubenville, OH), City of Weirton Municipal Building (200 Municipal Plaza), Mary H Weir Public Library (3442 Main Street) and available online at www.wvbrownfields.com. The notification read that public comments would be accepted through Patrick Kirby, NBAC Director, and Patrick Ford, BDC Executive Director, and that the draft proposal would be discussed at the public meeting on December 8th at 6:30-8:00pm in the Williams Country Club at 1000 Williams Drive, Weirton 26062. A copy of the community notification ad, a summary of the public comments, the BDC's response to the comments, and an agenda and meeting summary from the public meeting held on December 8th are attached.

Attachments

- i. Threshold Documentation (Now an attachment - not part of the 15 page limit)
- ii. Letter from state environmental authority
- iii. Letters of support from community-based organizations
- iv. Documentation indicating leveraged funds committed to your project
- v. Documentation of community notification including copies of public notices, comments received, response to comments, notes & sign-in sheets
- vi. Documentation of nonprofit status (if you are a nonprofit organization)
- vii. Documentation of applicant eligibility (if other than a city, county, state or tribe)
- viii. Justification for cleanup cost-share waiver (if applicable)
- ix. Property-specific determination request (if applicable)
- x. Petroleum determination (if applicable)
- xi. Special Considerations checklist from Appendix 3

SEND TO WVDEP AS POTENTIAL DRAFT

November 21, 2015

Mr. Patrick Ford, Executive Director
Business Development Corporation of the Northern Panhandle
3174 Pennsylvania Avenue, Suite 1
Weirton, WV 26062

Re: FY16 EPA Brownfields the Lodge Cleanup Grant Application

Dear Mr. Ford,

Thank you for your continued efforts to further enhance your local community and the state's environment and economy by applying for a FY2016 United States Environmental Protection Agency Site-Specific Hazardous Substances Brownfields Cleanup Grant. The 4.2 acre Lodge property and the Site-Specific Brownfields Cleanup grant will provide crucial funding to allow for the remaining cleanup to be conducted. By completing remediation site will finally be ready for redevelopment.

The Business Development Corporation of the Northern Panhandle has embraced brownfield redevelopment to revitalize the local economy, protect public health, and improve the environment, and has had great success with a previous Brownfields Cleanup Grant and Targeted Brownfields Assessments.

The West Virginia Department of Environmental Protection's Division of Land Restoration fully supports this project. We are committed to assisting you remediate and redevelop the Lodge property and return the property to productive and positive new uses. Please contact me or my staff if we can be of service.

Sincerely,

Patricia Hickman, Director
Division of Land Restoration

**ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES
THE LODGE AT WILLIAMS GOLF CLUB
1000 WILLIAMS DRIVE
WEIRTON, HANCOCK COUNTY, WEST VIRGINIA**

Prepared For:

**BUSINESS DEVELOPMENT CORPORATION
OF THE NORTHERN PANHANDLE
WEIRTON, WEST VIRGINIA**

Prepared By:

**CIVIL & ENVIRONMENTAL CONSULTANTS, INC.
EXPORT, PENNSYLVANIA**

CEC Project 143-716

November 2015

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FIGURES

Figure 1 – Site Layout

APPENDICES

Appendix A – Excerpt from Asbestos Survey Report

1.0 INTRODUCTION AND BACKGROUND

1.1 INTRODUCTION

This Analysis of Brownfields Cleanup Alternatives (ABCA) for the Lodge at the Williams Golf Club was prepared by Civil & Environmental Consultants, Inc. (CEC) on behalf of the Business Development Corporation of the Northern Panhandle (BDC). The BDC recently purchased the property from the Williams Golf & Country Club, Inc. and will submit an application to the U.S. Environmental Protection Agency (USEPA) for a Brownfields Cleanup Grant to be used for removing asbestos containing materials (ACM) from the lodge that is required for planned renovations.

1.2 SITE DESCRIPTION AND HISTORICAL USE

The Lodge is situated on a 4.2-acre parcel adjacent to the Williams Golf & Country Club located in Weirton, West Virginia. The lodge is a 10,000 square foot, three-story, stone and brick building with slate roof. Other structures located on the 4.2-acre parcel include a pool house and garage/storage building. The structures were built in the 1930s as part of the golf club development and were used through 2007. The structures have been vacant since that time.

1.3 PREVIOUS SITE INVESTIGATION AND REMEDIATION ACTIVITIES

An asbestos survey of the Lodge was performed by Professional Service Industries, Inc., a West Virginia-licensed asbestos inspector, in November 2013. A total of 67 samples were collected from 28 suspect asbestos-containing materials (ACM). Identified ACM included floor tile, pipe insulation, mastic associated with floor and ceiling tile, and chimney flashing. Excerpts from the asbestos survey report are provided in Appendix A.

A Phase I Environmental Site Assessment (ESA) of the 4.2-acre parcel was performed by American Geosciences, Inc. in October-November 2015. Based on the results of the Phase I ESA, no recognized environmental conditions (RECs) were identified.

1.4 SITE RE-USE PLANS

The BDC plans to sell the property to a private developer that will use the Lodge as a public inn and restaurant. The redevelopment plans include renovations to the Lodge that will require removal and disposal of ACM.

2.0 APPLICABLE REGULATIONS AND CLEANUP STANDARDS

The asbestos removal and renovation work will be performed in accordance with the requirements of West Virginia Codes 45CSR15 and 64CSR63. All required notifications will be made and the work will be performed by a West Virginia Bureau of Public Health licensed asbestos contractor.

3.0 EVALUATION OF CLEANUP ALTERNATIVES

3.1 CLEANUP ALTERNATIVES AND ESTIMATED COSTS

Removing the ACM prior to renovating the building is required by West Virginia law. There are no other viable alternatives (other than no action, in which case the building could not be renovated and reused according to current plans).

The estimated cost to complete the ACM removal is as follows:

Work Plan and Notifications	\$1,800
ACM Removal/Disposal.....	\$39,000
Third Party Final Monitoring.....	\$1,000
Project Management	<u>\$3,000</u>
Total.....	\$44,800

3.2 RECOMMENDED CLEANUP ALTERNATIVE

Again, removing the ACM prior to renovations is the only viable alternative.

3.3 CONSIDERATION OF CHANGING CLIMATE

Given the short duration and permanent nature of the ACM removal project, the effects of climate change will not be a factor.

FIGURES

APPENDIX A

EXCERPT FROM ASBESTOS SURVEY REPORT

PUBLIC NOTICE

USEPA BROWNFIELD GRANT APPLICATION

By the Business Development Corporation of the Northern Panhandle

The Business Development Corporation of the Northern Panhandle is announcing plans to submit a 2016 Brownfields Cleanup grant application to the United States Environmental Protection Agency (USEPA) for cleanup of the vacant 10,000 sq.ft. lodge at The Williams property, 1000 Williams Drive, located in Weirton, WV. Brownfields are properties that may be abandoned, idle, and/or underutilized that are not being redeveloped due to the presence or potential presence of a hazardous substance.

This application will request USEPA funds to assist with cleanup of known contamination at The Lodge. The USEPA encourages public participation in this application process to ensure the community's awareness and that the community's needs are being considered related to property redevelopment.

A **public meeting** will be held to foster community involvement, answer questions, and obtain comments on **Tuesday, December 8th, 2015 from 6:30-8:30PM in the Main Ballroom at The Williams, 1000 Williams Drive, Weirton 26062.**

A draft version of the application with a draft Analysis of Brownfields Cleanup Alternatives (ABCA) will be available for review and comment starting Tuesday, December 1, 2015 at the following locations:

- Business Development Corporation, 3174 Pennsylvania Ave, Weirton
- City of Weirton Municipal Building, 200 Municipal Plaza, Weirton
- BHJ Office, 124 Nth 4th Street, Steubenville, OH
- Mary H Weir Public Library, 3442 Main Street, Weirton
- www.wvbrownfields.com

Specific questions and/or comments can be addressed through December 11th to:

Patrick Ford, Executive Director
Business Development Corporation of the Northern Panhandle
3174 Pennsylvania Ave, Suite 1
Weirton, WV 26062
304-748-5041

Mr. Patrick Kirby, Director
Northern West Virginia Brownfields Assistance Center
385 Evansdale Drive
P.O. Box 6064
Morgantown, WV 26506
304-293-6984

**Appendix 3
Cleanup Other Factors Checklist**

Name of Applicant: Business Development Corporation of the Northern Panhandle
 Please identify (with an *x*) which if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the evaluation process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page #
	<i>None of the Other Factors are applicable.</i>	
X	Community population is 10,000 or less.	Narrative Page
	Applicant is, or will assist, a federally recognized Indian tribe or United States	
	Targeted brownfield sites are impacted by mine-scarred land.	
X	Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	Narrative Pages
	Recent (2008 or later) significant economic disruption has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	
	Applicant is one of the 24 recipients, or a core partner/implementation strategy party, of a “manufacturing community” designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation which demonstrate either designation as one of the 24 recipients, or relevant pages from a recipient’s IMCP proposal which lists/describes the core partners and implementation strategy parties.	
	Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, applicant must attach documentation.	
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	

INTERNAL REVENUE SERVICE
DISTRICT DIRECTOR
P. O. BOX 2500
CINCINNATI, OH 45201

DEPARTMENT OF THE TREASURY

Date: **JAN 12 1995**

BUSINESS DEVELOPMENT CORPORATION
OF THE NORTHERN PANHANDLE
3147 WEST STREET
WEIRTON, WV 26062-4644

Employer Identification Number:
65-0630721
Case Number:
314326002
Contact Person:
ZENIA LUK
Contact Telephone Number:
(513) 684-8578
Accounting Period Ending:
December 31
Foundation Status Classification:
509(a)(1)
Advance Ruling Period Begins:
May 9, 1994
Advance Ruling Period Ends:
December 31, 1998
Addendum Applies:
No

Dear Applicant:

Based on information you supplied, and assuming your operations will be as stated in your application for recognition of exemption, we have determined you are exempt from federal income tax under section 501(a) of the Internal Revenue Code as an organization described in section 501(c)(3).

Because you are a newly created organization, we are not now making a final determination of your foundation status under section 509(s) of the Code. However, we have determined that you can reasonably expect to be a publicly supported organization described in sections 509(a)(1) and 170(b)(1)(A)(vi).

Accordingly, during an advance ruling period you will be treated as a publicly supported organization, and not as a private foundation. This advance ruling period begins and ends on the dates shown above.

Within 90 days after the end of your advance ruling period, you must send us the information needed to determine whether you have met the requirements of the applicable support test during the advance ruling period. If you establish that you have been a publicly supported organization, we will classify you as a section 509(a)(1) or 509(a)(2) organization as long as you continue to meet the requirements of the applicable support test. If you do not meet the public support requirements during the advance ruling period, we will classify you as a private foundation for future periods. Also, if we classify you as a private foundation, we will treat you as a private foundation from your beginning date for purposes of section 509(d) and 4940.

Grantors and contributors may rely on our determination that you are not a private foundation until 90 days after the end of your advance ruling period. If you send us the required information within the 90 days, grantors and contributors may continue to rely on the advance determination until we make a final determination of your foundation status.

If we publish a notice in the Internal Revenue Bulletin stating that we

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will no longer treat you as a publicly supported organization; grantors and contributors may not rely on this determination after the date we publish the notice. In addition, if you lose your status as a publicly supported organization and a grantor or contributor was responsible for, or was aware of, the act or failure to act, that resulted in your loss of such status, that person may not rely on this determination from the date of the act or failure to act. Also, if a grantor or contributor learned that we had given notice that you would be removed from classification as a publicly supported organization, then that person may not rely on this determination as of the date he or she acquired such knowledge.

If you change your sources of support, your purposes, character, or method of operation, please let us know so we can consider the effect of the change on your exempt status and foundation status. If you amend your organizational document or bylaws, please send us a copy of the amended document or bylaws. Also, let us know all changes in your name or address.

As of January 1, 1984, you are liable for social security taxes under the Federal Insurance Contributions Act on amounts of \$100 or more you pay to each of your employees during a calendar year. You are not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

Organizations that are not private foundations are not subject to the private foundation excise taxes under Chapter 42 of the Internal Revenue Code. However, you are not automatically exempt from other federal excise taxes. If you have any questions about excise, employment, or other federal taxes, please let us know.

Donors may deduct contributions to you as provided in section 170 of the Internal Revenue Code. Bequests, legacies, devises, transfers, or gifts to you or for your use are deductible for Federal estate and gift tax purposes if they meet the applicable provisions of sections 2055, 2106, and 2522 of the Code.

Donors may deduct contributions to you only to the extent that their contributions are gifts, with no consideration received. Ticket purchases and similar payments in conjunction with fundraising events may not necessarily qualify as deductible contributions, depending on the circumstances. Revenue Ruling 67-246, published in Cumulative Bulletin 1967-2, on page 104, gives guidelines regarding when taxpayers may deduct payments for admission to, or other participation in, fundraising activities for charity.

You are not required to file Form 990, Return of Organization Exempt From Income Tax, if your gross receipts each year are normally \$25,000 or less. If you receive a Form 990 package in the mail, simply attach the label provided, check the box in the heading to indicate that your annual gross receipts are normally \$25,000 or less, and sign the return.

If you are required to file a return you must file it by the 15th day of the fifth month after the end of your annual accounting period. No charge or penalty of \$10 a day when a return is filed later, unless there is reasonable

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cause for the delay. However, the maximum penalty we charge cannot exceed \$5,000 or 5 percent of your gross receipts for the year, whichever is less. We may also charge this penalty if a return is not complete. So, please be sure your return is complete before you file it.

You are not required to file federal income tax returns unless you are subject to the tax on unrelated business income under section 511 of the Code. If you are subject to this tax, you must file an income tax return on Form 990-T, Exempt Organization Business Income Tax Return. In this letter we are not determining whether any of your present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

You need an employer identification number even if you have no employees. If an employer identification number was not entered on your application, we will assign a number to you and advise you of it. Please use that number on all returns you file and in all correspondence with the Internal Revenue Service.

Section 508(a)(2) of the Internal Revenue Code states we will not treat an organization organized after October 9, 1969, as an organization described in section 501(c)(3) for any period before it gives notice that it is applying for recognition of exempt status, if it gives such notice after the time prescribed in the regulations.

Section 1.508-1(a)(2)(i) of the Income Tax Regulations states that an organization seeking exemption under section 501(c)(3) must file the notice described in section 508(a) within 15 months from the end of the month in which it was organized. The notice is filed by submitting a properly completed Form 1023, exemption application, with the key district director.

Our records show that your notice was postmarked May 9, 1994, which is more than 15 months from the end of the month in which you were organized. Since the provisions of section 508(a)(2) apply to you, the effective date of your exemption is May 9, 1994. Contributions made to you on or after this date are tax deductible.

You have agreed on your application for exemption under section 501(c)(3) of the Code that your exemption is effective May 9, 1994, the date your completed application was filed.

This determination is based on evidence that your funds are dedicated to the purposes listed in section 501(c)(3) of the Code. To assure your continued exemption, you should keep records to show that funds are spent only for those purposes. If you distribute funds to other organizations, your records should show whether they are exempt under section 501(c)(3). In cases where the recipient organization is not exempt under section 501(c)(3), you must have evidence that the funds will remain dedicated to the required purposes and that the recipient will use the funds for those purposes.

If we said in the heading of this letter that an addendum applies, the

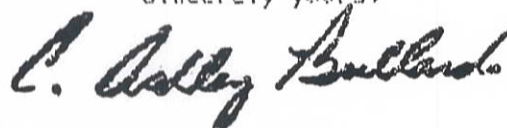
BUSINESS DEVELOPMENT CORPORATION

addendum enclosed is an integral part of this letter.

Because this letter could help us resolve any questions about your exempt status and foundation status, you should keep it in your permanent records.

If you have any questions, please contact the person whose name and telephone number are shown in the heading of this letter.

Sincerely yours,



C. Ashley Bullard
District Director

Enclosure(s):
Form 872-C



Internal Revenue Service
District Director
Internal Revenue Service Center
P.O. Box 192
Covington KY 41012-0192

Department of the Treasury
AR Ltr 1046 ALS EO

Date: December 17, 1998

BUSINESS DEVELOPMENT CORPORATION OF
THE NORTHERN PANHANDLE
3200 MAIN STREET
WEIRTON WV 26062-4796

EIN: 55-0630721
Advance Ruling Period Ended: December 31, 1998

Advance Ruling Follow-up

Dear Sir or Madam:

Our letter dated January 1995, stated that we had determined your organization is exempt under section 501(a) of the Internal Revenue Code as an organization described in section 501(c)(3) and that you would be treated as a publicly supported organization and not as a private foundation during your advance ruling period. This was based on our determination that you could reasonably be expected to be an organization described in sections 170(b)(1)(A)(vi) and 509(a)(1) or in section 509(a)(2).

We also stated that at the end of your advance ruling period you would have to establish that you were in fact an organization described in one of the above sections.

Our records indicate that your advance ruling period ends on December 31, 1998. Your exempt status as an organization described in section 501(c)(3) is still in effect. However, to establish that you are a publicly supported organization described in sections 170(b)(1)(A)(vi) and 509(a)(1) or in section 509(a)(2), please complete the attached Form 8734, Support Schedule for Advance Ruling Period, for each of the tax years in your advance ruling period.

The information requested in this letter is required to support your claim to be other than a private foundation. It is needed in addition to any required Form 990 or other annual return. Please send it to us within 90 days from the end of your advance ruling period.

If we do not receive this information, we will presume you are a private foundation and you will be treated as a private foundation as of the first day of your first tax year for purposes of sections 507(d) and 4940 of the Code. In addition, if you do not provide the information by the time requested, it will be considered by the Internal Revenue Service that you have not taken all reasonable steps, in a timely manner, to secure the determination you requested. Under section 7428(b)(2) of the Code, not taking all reasonable steps, in a timely manner, to secure the determination may be considered as a failure to exhaust administrative remedies available to you within the Service, and may preclude the issuance of a declaratory judgment in the matter under judicial proceedings.

If you have any questions please contact Dorothy Downing between the hours of 8 A.M. and 3:30 P.M. EST at (877) 829-5500 for assistance. If you prefer to write please include a copy of this letter.

Thank you for your cooperation.

Sincerely yours

C. Ashley Bullard
District Director

Enclosures: Copy of this letter
Letter 1046 Attachment
Form 8734

AR Ltr 1046 ALS /1782731905



HANCOCK COUNTY COMMISSION

JEFF DAVIS PRESIDENT
DAN GREATHOUSE COMMISSIONER
MICHAEL SWARTZMILLER COMMISSIONER

RESOLUTION 2011-2012

WHEREAS, the Hancock County Commission wishes to continue its participation in the Certified Development Program.

WHEREAS, the Hancock County Commission continues to recognize the Business Development Corporation of the Northern Panhandle as the lead economic development corporation for the economic development effort in Brooke and Hancock Counties.

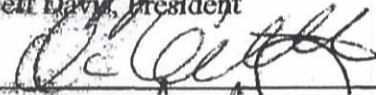
Now Therefore, Be It Resolved, in support of this effort, the Hancock County Commission agrees to pledge \$30,000.00 to be used as a cash match toward the grant being made available by the State of West Virginia for this economic development program.

Approved by the Hancock County Commission this 7th day of April, 2011.

HANCOCK COUNTY COMMISSION



Jeff Davis, President

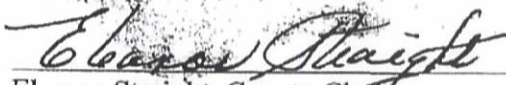


Dan Greathouse, Commissioner



Michael C. Swartzmiller, Commissioner

ATTEST



Eleanor Straight, County Clerk



2208 Warwood Avenue

Wheeling, WV 26003

(304) 230-1230

November 6, 2015

TL04-15-08-001-DCN040

Mr. Joe Nowak
United States Environmental Protection Agency
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

RE: Asbestos Survey Report
Williams Site
100 Williams Drive, Weirton, West Virginia

Dear Mr. Nowak:

Please find enclosed the **Asbestos Survey Report** for the Williams Site in Weirton, West Virginia.

This Asbestos Survey Report is submitted to fulfill tasking under United States Environmental Protection Agency (USEPA) Region III Hazardous Site Cleanup Division, Superfund Technical Assessment & Response Team – West (START) Contract EP-S3-15-03, Technical Direction Document (TDD) No. TL04-15-08-001.

This deliverable is being submitted to you via e-mail in Adobe Acrobat PDF format. We appreciate this opportunity to assist the USEPA Region III and look forward to providing continued support. If you have any questions, please feel free to contact me at (304) 907-0632.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Suddha Graves'.

Suddha Graves
Project Manager

cc: P. Ford, BDC

TL Central File



Asbestos Survey Report

Williams Site - Lodge
Williams Country Club
1000 Williams Drive
Weirton, West Virginia 26062

Prepared for

TechLaw, Inc.
2208 Warwood Avenue
Wheeling, West Virginia 26003

Prepared by

Professional Service Industries, Inc.
850 Poplar Street
Pittsburgh, PA 15220

November 3, 2015

PSI Project # 08162184



November 3, 2015

TechLaw, Inc.
2208 Warwood Avenue
Wheeling, West Virginia 26003

Attention: Mr. Suddha Graves
Project Manager

Subject: Asbestos Survey
Williams Site – Lodge
Williams Country Club
1000 Williams Drive
Weirton, West Virginia 26062
PSI Project #08162184

Dear Mr. Graves:

Professional Service Industries, Inc. (PSI) performed the Asbestos Survey at the Williams Country Club Lodge. PSI provided its services in general accordance with our agreement dated September 18, 2015. PSI transmits one original copy with this letter.

PSI thanks you for choosing us as your consultant for this project. Please contact us at 412-922-4000 if you have any questions or we may be of further service.

Respectfully Submitted,

PROFESSIONAL SERVICE INDUSTRIES, INC.

A handwritten signature in black ink, appearing to read "D. E. Finke".

Douglas E. Finke
Project Manager

A handwritten signature in black ink, appearing to read "Joseph L. Kuchnicki".

Joseph L. Kuchnicki, CHMM
Principal Consultant

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APPENDIX E – INSPECTOR AND LABORATORY CERTIFICATIONS

1 EXECUTIVE SUMMARY

Professional Service Industries (PSI), Inc., was retained by TechLaw, Inc. to conduct a survey for asbestos-containing materials (ACM) in the Vacant Lodge, located at the Williams Country, 1000 Williams Drive, Weirton, WV 26062.

The subject building is a 10,000-sq. ft., three-story, stone structure that was constructed in 1932. The subject structure was un-occupied during the inspection.

The purpose of the investigation and sampling was to provide information regarding the presence, condition, and estimated quantity of accessible ACMs located at the facility prior to its planned renovation. Exterior areas and the roof system were included in the scope of this survey.

The asbestos inspection and sampling was conducted on September 24, 2015. A total of 67 samples were collected from 29 suspect asbestos-containing homogeneous materials during the survey. The samples were analyzed by polarized light microscopy (PLM).

The following 10 ACMs (>1% asbestos) were identified during this investigation:

- **(WCC-05) Beige with Gray Streaks Floor Tile and Black Mastic** – Ground Floor Kitchen Breezeway
- **(WCC-06) Pipe Fitting Insulation** – Throughout Ground Floor, 2nd Floor Attic and assumed to be behind walls and ceilings on 1st Floor
- **(WCC-07) “Mag Block” Pipe Insulation** - Throughout Ground Floor, 2nd Floor Attic and assumed to be behind walls and ceilings on 1st Floor
- **(WCC-09) Residual Black Mastic on floor** – Ground Floor Corner Office #2 (corner front)
- **(WCC-12) 9” x 9” Beige with Splotches Floor Tile with Black Mastic** – Under Carpet in Ground Floor Hallway, Corner Office #1 and Ground Floor Kitchen Office
- **(WCC-13) Brown Glue** – Ground Floor Kitchen Wall behind 4” Ceramic Tiles
- **(WCC-15) Brown Glue** – Ground Floor Kitchen Ceiling behind 4” Ceramic Tiles
- **(WCC-16) 9” x 9” Red Floor Tile (thin)** – Ground Floor Kitchen under Carpet
- **(WCC-22) Tar Flashing** – on Chimney Roof
- **(WCC-29) Black Tar** – Behind Slate Roof Panels

In addition, the following materials were not sampled due to inaccessibility, safety concerns, or in order to avoid compromising their integrity, and are assumed to be ACM:

- None

The identified or assumed ACMs were observed to be in good and damaged condition at the time of the field investigation. There were localized portions of the pipe insulation and pipe fitting insulation on the ground floor.

ACMs should be maintained in a good non-damaged condition through use of an Operations and Maintenance (O&M) program. Regulated ACM (RACM) must be properly removed by a licensed asbestos abatement contractor prior to renovations or demolition that would disturb the material. Federal, State and Local regulations and guidelines should be strictly adhered to when removing the ACM.

In many areas, EPA Category I & II non-friable ACMs in good condition do not need to be removed prior to demolition. However, if demolition practices will cause these materials to be cut, sanded, ground or abraded, or otherwise made friable, they should be treated as RACM and removed prior to demolition. If non-friable ACM's are not removed prior to demolition, the generated debris cannot be recycled, burned or used as clean-fill.

In addition, prior to any future maintenance, renovation or demolition activities, any assumed ACMs should be tested, and any areas noted as inaccessible during this project, or any concealed areas, such as behind walls, where suspect ACMs are discovered, will require a survey for ACM.

The following materials were point counted and determined to contain $\leq 1\%$ asbestos; therefore they are not considered to be ACM by EPA or OSHA.

- Plaster Skim Coat

These materials are unregulated by EPA, and are considered unclassified asbestos work per OSHA. Some OSHA work control practices and prohibitions will still apply, with the extent depending on whether the worker's exposure to airborne asbestos exceeds the OSHA PEL during the renovation/demolition process.

This summary does not contain all the information presented in the full report. The report should be read in its entirety to obtain a more complete understanding of the information provided and to aid in any decisions made or actions taken based on this information.

2 INTRODUCTION

2.1 SCOPE OF SERVICES

The scope of services for this project consisted of conducting an asbestos survey, including inspection, sampling and analysis of accessible and exposed interior and exterior areas at the subject facility, including the roof.

The subject area(s) of the facility for this investigation included the entire building.

The investigation included a review of client-provided records or documents (if available), visual inspection of the subject area(s), sample collection, polarized light microscopy (PLM) sample analysis, quantification of ACMs, and report preparation & review.

2.2 PURPOSE

The purpose of this survey was to provide general information for the subject building(s) regarding the presence, condition, and quantity of accessible and/or exposed friable and non-friable, building materials that contain asbestos.

2.3 AUTHORIZATION

Authorization to perform this work was given on September 18, 2015 by Judy Manley, Senior Vice President of TechLaw Inc. The project was conducted in accordance with the scope, terms and conditions of PSI Proposal No. 816-161668 dated September 10, 2015.

2.4 LIMITATIONS

This asbestos survey was intended to meet the requirements of the National Emissions Standard for Hazardous Air Pollutants (NESHAP) for Asbestos demolition or renovation. The survey included a thorough inspection of the entire building planned for renovation.

Roof Systems were included in the scope of this survey.

Destructive sampling, such as behind finished surfaces (plaster/drywall walls, above hard ceilings, etc.), inside mechanical chases, behind mirrored walls, under carpet or tiled floors, etc., was not generally conducted to assess inaccessible or concealed materials.

Inaccessible is defined as areas of the building that were locked, or where admittance was not permitted. It also includes areas/materials that could not be tested (sampled) without destruction of the structure or a portion of the structure, and areas/materials that could not be safely reached by the inspector or inspection team. In the event that access to a portion of the building was not obtained (which otherwise would have been tested), such limitations specifically are identified in the Findings Section of this report.

PSI did not sample any system which presented a hazard to the inspection team such as energized electrical systems or within confined spaces.

PSI did not collect samples from building elements where the intended use would be compromised by testing, such as fire rated doors, vapor barriers, mirror mastics, etc.

2.5 WARRANTY

The field and laboratory results reported herein are considered sufficient in detail and scope to determine the presence of accessible and/or exposed suspect ACM for the building structure. Professional Service Industries (PSI), Inc., warrants that the findings contained herein have been prepared in general accordance with accepted professional practices at the time of its preparation as applied by professionals in the community. Changes in the state of the art or in applicable regulations cannot be anticipated and have not been addressed in this report.

The survey and analytical methods have been used to provide the client with information regarding the presence of accessible and/or exposed suspect ACM existing at the time of the inspection. Test results are valid only for the material(s) tested. There is a distinct possibility that conditions may exist which could not be identified within the scope of the study or which were not apparent during the site visit. This inspection covered only those areas that were exposed and/or physically accessible to the Inspector. The study is also limited to the information available from the client at the time it was conducted.

As directed by the client, PSI did not provide any service to investigate or detect the presence of moisture, mold or other biological contaminants in or around any structure, or any service that was designed or intended to prevent or lower the risk of the occurrence of the amplification of the same. Client acknowledges that mold is ubiquitous to the environment with mold amplification occurring when building materials are impacted by moisture. Client further acknowledges that site conditions are outside of PSI's control, and that mold amplification will likely occur, or continue to occur, in the presence of moisture. As such, PSI cannot and shall not be held responsible for the occurrence or recurrence of mold amplification.

No other warranties are implied or expressed.

3 GENERAL BUILDING AND SURVEY INFORMATION

3.1 BUILDING INFORMATION

<u>Subject Property:</u>	Williams Site – Lodge Williams Country Club 1000 Williams Drive Weirton, WV 26062
<u>Facility Construction Date:</u>	1932
<u>Previous Renovation Dates:</u>	Unknown
<u>Number of Floors:</u>	3-stories
<u>Est. Square Footage:</u>	10,000 sq. ft.
<u>Construction Type</u>	Stone structure with slate roof
<u>Building Occupant(s):</u>	vacant
<u>Additional Information:</u>	

3.2 INSPECTION INFORMATION

<u>Name of PSI Inspector(s):</u>	Doug Finke State License # AI007928
<u>Date(s) of Inspection:</u>	September 24, 2015
<u>Escort:</u>	None

4 METHODOLOGY

Inspection and sampling procedures were performed in general accordance with the guidelines published by the Environmental Protection Agency (EPA). The inspection and survey described below was performed by an EPA accredited and State of West Virginia licensed inspector.

4.1 RECORD DOCUMENT REVIEW

Prior to conducting the visual inspection, PSI reviewed documents provided by the client, including: drawings, floor plans, historical data, maintenance records, previous survey reports, laboratory reports, etc. for information regarding construction history and building materials.

The following documents were reviewed as a part of this Asbestos Survey:

- None

This data was used to focus the walk through and scope of work to be followed over the course of our visual inspection and sampling. Information obtained from the references is included in the findings section of the report.

4.2 VISUAL INSPECTION PROCEDURES

An initial individual building structure walkthrough was conducted to determine the presence of suspect asbestos-containing materials that were accessible and/or exposed. Exterior areas, including the roof systems, were included in the scope of this investigation.

The inspection and sampling was limited to those areas and materials that were accessible and did not involve destruction of walls, other building elements, physical barriers, or the structural integrity of the item being tested.

Materials which were similar in color, texture, general appearance and which appear to have been installed at the same time were grouped in Homogeneous Sampling Areas. Such materials are termed "homogeneous materials" by the EPA. During this walkthrough, the approximate locations of these homogeneous materials were also noted.

The inspector evaluated the overall condition of the material and determined whether the materials were friable or non-friable by touching the material, where practical. A friable material is defined as any material able to be crushed, crumbled, pulverized or reduced to a powder by hand press when dry.

Each material was further assessed for overall condition. Conditions were rated as good, damaged or significantly damaged. PSI's inspector also identified the EPA classification of the material: Regulated ACM (RACM), Category I non-friable ACM, and Category II non-friable ACM, based on the materials current condition. PSI's inspector provided estimated quantities of the materials identified as ACM, based only on materials that were accessible and exposed.

4.3 ASBESTOS SAMPLING PROCEDURES

Following the walkthrough, the Inspector collected samples of suspect materials.

EPA guidelines were used to determine the sampling protocol. Sampling locations were chosen to be representative of the homogeneous sampling area. While an effort was made to collect samples randomly, samples were taken preferentially from areas already damaged or areas which were the least visible to minimize disturbance of the material.

Each sample location was sprayed with amended water and was kept wet during the entire sampling process. Samples were collected by coring through the material from the surface down to the base substrate. All layers of the material were extracted in placed into a sample container for transport to the laboratory. Sample containers were sealed and labeled with a unique sample identification number. Where appropriate, sampled materials were sealed with an encapsulant or covered with tape after sampling. PSI is not responsible for restoring the sampled areas to their presampled condition.

In accordance with the agreement between PSI and the client, roofing materials were sampled as part of this survey. Roofing materials were sampled by coring through the roof system to the base deck material. PSI applied a temporary patch to the roof core location following sample extraction. Due to the destructive nature of roof sampling however, PSI does not warrant a water tight condition following sample extraction, nor can PSI guarantee the continuance of any roof system warranties by other entities.

4.4 ASBESTOS ANALYSIS PROCEDURES

All samples were analyzed at Professional Service Industries, Inc. located at 850 Poplar Street, Pittsburgh, Pennsylvania 15220. The PSI Pittsburgh Asbestos Laboratory is a National Voluntary Laboratory Accreditation Program (NVLAP) Accredited (#101350-0) and an American Industrial Hygiene Association (AIHA) Accredited (#8222) Laboratory. A copy of the Laboratory's Accreditation Certificate is included in Appendix E.

The samples were analyzed for asbestos on a "positive-stop" basis by polarized light microscopy (PLM) in accordance with the "EPA Method for the Determination of Asbestos in Bulk Building Materials" (EPA/600/R-93/116 July 1993). Analysis was performed by using bulk samples for visual observation and slide preparation(s) for microscopic examination and identification. The samples were mounted on slides and then analyzed for asbestos (chrysotile, amosite, crocidolite, anthophyllite, actinolite/tremolite), and fibrous non-asbestos constituents (mineral wool, fiberglass, cellulose, etc.). Asbestos was identified by refractive indices, morphology, color, pleochroism, birefringence, extinction characteristics, and signs of elongation. The same characteristics were used to identify the non-asbestos constituents.

The microscopist visually estimated relative amounts of each constituent by determining the volume of each constituent in proportion to the total volume of the sample, using a stereoscope.

The EPA method allows samples which are visually determined to have 10% or less asbestos to be quantified using a Point Count procedure. An ocular reticule (cross hair or point array) is used to visually superimpose a point or points on the microscope field of view. A total of 400 points

superimposed on either asbestos fibers or nonasbestos matrix material must be counted over at least eight different preparations of representative subsamples. If an asbestos fiber and matrix particle overlap so that a point is superimposed on their visual intersection, a point is scored for both categories. Point counting provides a quantification of the area percent asbestos. Eight samples were point counted for this survey.

5 FINDINGS

5.1 ASBESTOS RESULTS

A total of 67 samples were collected from 28 suspect homogenous materials during the asbestos survey. In addition, no suspect homogeneous materials were observed during the asbestos survey but were not sampled, and are assumed to contain asbestos until sampling and laboratory analysis can be conducted.

The "Report of Bulk Sample Analysis for Asbestos", the "Asbestos Bulk Sample Log", Sample Location diagram and Photographs are included in the Appendices. The Tables on the following pages list the suspect asbestos-containing materials observed throughout the building. Table 1 lists the materials that were sampled, along with the results of the inspection and laboratory analysis. Table 2 lists the suspect materials that were not sampled and are assumed to be ACM.

Both tables give a description of the materials, their general locations, condition, friability, EPA NESHAP Category, and estimated quantity, and an estimated cost estimate for abatement.

Inaccessible Areas

The following areas were inaccessible during the survey and therefore were not included in the scope of the survey.

- None

These areas will require an asbestos inspection prior to any demolition or renovation activities within the areas.

Non-Suspect Materials

The following materials were observed but are considered 'non-suspect' ACM due to their composition (fiberglass, rubber, etc.) and were not sampled.

- None

Regulatory Guidelines

ACM Definition - The EPA & OSHA consider a material to be asbestos-containing if at least one sample from the homogeneous area shows asbestos in an amount greater than 1%.

Point Count Quantification - If a material is found to contain 10% or less asbestos via visual estimation, it can be treated as non asbestos-containing per EPA Regulations, if verified to contain 1% or less asbestos by the Point Count Quantification Procedure. If not point counted, a sample in which asbestos was visually detected and estimated (including trace to $\leq 1\%$) must be assumed to be greater than 1% and treated as ACM. Please refer to the laboratory analyses for a more detailed description of the microscopic analysis of individual samples. Eight samples were quantified by the Point Count Procedure in this Asbestos Survey.

EPA NESHAP Category - EPA classifies ACM into several categories. A **regulated asbestos-containing material (RACM)** as defined by the Asbestos National Emissions Standard for Hazardous Air Pollutants (NESHAP) is any (a) Friable asbestos material, (b) Category I non-friable ACM that has become friable, (c) Category I non-friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or (d) Category II non-friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations. A **Category I Non-friable ACM** includes packings, gaskets, resilient floor covering, and asphalt roofing products which contain more than one percent asbestos. A **Category II Non-friable ACM** includes any material, except for a Category I non-friable ACM, which contains more than one-percent asbestos and cannot be reduced to a powder by hand pressure when dry.

The Occupational Safety and Health Administration (OSHA) requires all suspect materials to be analyzed by layer, even materials such as drywall/joint compound, which may sometimes be composited per the EPA. If any layer contains asbestos in a concentration >1%, the material is considered an ACM.

OSHA has a classification system (I thru IV) for ACM depending on the type of material and the disturbance. Briefly, **'Class I'** work is defined as activities involving the removal of ACM or presumed ACM (PACM) that is thermal system insulation (TSI) and surfacing materials. **'Class II'** activities involve removal of ACM/PACM other than TSI or surfacing material. **'Class III'** work includes repair and maintenance operations which are likely to disturb ACM/PACM, and **'Class IV'** work includes maintenance and custodial activities during which employees contact but do not disturb ACM/PACM.

Materials where asbestos is detected, but where point counting is conducted and determined that the concentration is $\leq 1\%$ asbestos, are not considered to be ACM by OSHA. However, these materials are considered unclassified asbestos work per OSHA. Some OSHA work control practices and prohibitions will still apply, with the extent depending on whether the worker's exposure to airborne asbestos exceeds the OSHA permissible exposure limit (PEL).

Additional details of the OSHA asbestos regulations related to the construction industry can be found in 29 CFR part 1926.1101.

Quantification

Quantification of suspect asbestos-containing materials was conducted using visual estimation by a licensed asbestos inspector. This visual estimation was performed in accordance with generally accepted practices in the asbestos industry based on materials that were accessible and exposed. These values are sufficiently accurate for the purpose of documenting the presence of asbestos within its space for the purpose of identifying abatement control conditions or for general policy considerations. Actual quantities may differ between visually estimated values and physical measurements. If a licensed asbestos abatement contractor is engaged to remove asbestos containing materials, the abatement contractor is responsible for verifying reported quantities of ACM.

Abatement Cost Estimation

PSI used recognized standard engineering principles in developing the unit cost budgetary estimate for removal of the listed asbestos-containing materials (ACM) contained in this facility. This is an estimate for removal only, intended for general policy decisions regarding program development and planning. The figures are as of the date of the report and cover only the removal contractor's fees. Not included are items such as indirect or hidden costs, such as employee relocation during the project, lost revenues, replacement costs, project design or monitoring, etc. These items are considered during the development of an engineering cost estimate, which is beyond the scope of this study. Other variables included in an engineering cost estimate are the project schedule and phasing, size of the project, and other factors that can affect project cost.

TABLE 1 – SUSPECT ACMs - SAMPLED

MATERIAL # & (# SAMP)	MATERIAL DESCRIPTION	MATERIAL LOCATION	F/INF ¹	COND. ²	% ACM & TYPE ³	EPA NESHAP CAT ⁴	EST. QTY.	EST. REMOVAL COST (\$)
WCC-01 (2)	Exterior Window Glazing	All Windows	NF	Good	NAD	NA	NA	NA
WCC-02 (2)	Exterior Window Caulking	All Windows	NF	Good	NAD	NA	NA	NA
WCC-03 (2)	9" x 9" Red Floor Tile with Black Mastic	Ground Floor Data Room (room next to boiler room)	NF	Good	FT – NAD M – NAD	NA	NA	NA
WCC-04 (2)	Gray with Cream Streaks Sheet Flooring (no mastic)	Ground Floor Storage Room (across from data room)	NF	Good	NAD	NA	NA	NA
WCC-05 (2)	12" x 12' Beige with Gray Specs Floor Tile and Black Mastic	Ground Floor Kitchen Breezeway	NF	Good	FT – 2.5% Ch (PT) M – 5.2% Ch (PT)	CAT I NF	80 SF	\$500
WCC-06 (3)	Pipe Fitting Insulation	Throughout Ground Floor, 2 nd Floor Attic Space, Assumed to Run Behind Walls and Above Ceilings on 1 st Floor	F	Dmg	10% Ch	RACM	160 Ea	\$1,600
WCC-07 (3)	"Mag Block" Pipe Insulation	Throughout Ground Floor, 2 nd Floor Attic Space, Assumed to Run Behind Walls and Above Ceilings on 1 st Floor	F	Dmg	50% Ch	RACM	600 LF	\$6,000
WCC-08 (2)	Interior Window Glazing	All Windows	NF	Good	NAD	NA	NA	NA

1 F = Friable; NF = Non-friable
 2 Cond. = Condition Of Materials Either good, dam = damaged, sig. dam. = significant damage
 3 NAD = No Asbestos Detected, Ch = Chrysotile, Am = Amosite, PT = Point Count Analysis
 4 NESHAP Category - Regulated ACM (RACM), Cat I NF=Category I Non-Friable ACBM, Cat II NF= Category II Non-Friable ACBM.

TABLE 1 - SUSPECT ACMs - SAMPLED

Williams Country Club - Lodge

Survey Date(s): September 24, 2015

MATERIAL # & (# SAMP)	MATERIAL DESCRIPTION	MATERIAL LOCATION	F/NF ¹	COND. ²	% ACM & TYPE ³	EPA NESHAP CAT ⁴	EST. QTY.	EST. REMOVAL COST (\$)
WCC-09 (2)	Residual Black Mastic on Floor	Ground Floor Corner Office #2 (corner front)	NF	Dmg	2.3% Ch (PT)	CAT II NF	150 SF	\$500
WCC-10 (3)	Interior Boiler Packing	Boiler	NF	Good	NAD	NA	NA	NA
WCC-11 (7)	Plaster (Skim and Base Coat)	Throughout Walls and Ceilings	NF	Good	Skim - NAD Base - <1% Ch (PT)	NA	NA	NA
WCC-12 (2)	9" x 9" Beige with Splotches Floor Tile and Black Mastic	Ground Floor hallway, Ground Floor Corner Office 1, and Floor Kitchen Office	NF	Good	FT - 1.8% Ch (PT) M - 4% Ch	CAT I NF	400 SF	\$1,400
WCC-13 (2)	Brown Mastic on Fiberboard	Ground Floor Kitchen Wall Behind Metal Tiles	F/NF	Good	FB - NAD M - 1.5% Ch (PT)	CAT II NF	300 SF	\$900
WCC-14 (2)	Black Mastic on Wall Behind Fiberboard	Ground Floor Kitchen Wall	NF	Good	NAD	NA	NA	NA
WCC-15 (2)	Brown Mastic	Ground Floor Kitchen Ceiling Behind Metal Tiles	NF	Good	3% Ch	CAT II NF	200 SF	\$600

¹ F = Friable; NF = Non-friable

² Cond. = Condition Of Materials

³ NAD = No Asbestos Detected; Ch = Chrysotile; Am = Amosite; PT = Point Count Analysis

⁴ NESHAP Category - Regulated ACM (RACM); Cat I NF=Category I Non-Friable ACBM, Cat II NF= Category II Non-Friable ACBM.



TABLE 1 - SUSPECT ACMs - SAMPLED

Williams Country Club - Lodge

Survey Date(s): September 24, 2015

MATERIAL # & (# SAMP)	MATERIAL DESCRIPTION	MATERIAL LOCATION	F/NF ¹	COND. ²	% ACM & TYPE ³	EPA NESHAP CAT ⁴	EST. QTY.	EST. REMOVAL COST (\$)
WCC-16 (2)	9" x 9" Red Floor Tile (thin) with Black mastic	Under Carpet in Ground Floor Kitchen	NF	Good	FT - 2.0 Ch (PT) M - NAD	CAT I NF	200 SF	\$500
WCC-17 (2)	Black Tar Wrap on AC Lines	Ground Floor Sun Room	NF	Good	NAD	NA	NA	NA
WCC-18 (2)	Wire Wrap	Boiler Room Wires	NF	Good	NAD	NA	NA	NA
WCC-19 (3)	Blown-in Insulation	Sun Room Above Ceiling	F	Good	NAD	NA	NA	NA
WCC-20 (2)	Slate Shingle Underlayment	Roof	NF	Good	NAD	NA	NA	NA
WCC-21 (2)	Metal Coping Caulking	Roof	NF	Good	NAD	NA	NA	NA
WCC-22 (2)	Chimney Tar Flashing	Roof	NF	Good	4.5% Ch (PT)	CAT I NF	100 LF	\$500
WCC-23 (2)	Tan Cove Base with Yellow Mastic	1 st Floor Guest Room 3 Bathroom	NF	Good	Cove - NAD M - NAD	NA	NA	NA
WCC-24 (2)	Paper Floor Underlayment with Black Backing	Throughout 2 nd Floor Guestroom	F	Good	Paper - NAD Backing - NAD	NA	NA	NA
WCC-25 (2)	Blue Sheet Flooring (no mastic)	2 nd Floor Storage Room 1	NF	Good	NAD	NA	NA	AN

¹ F = Friable; NF = Non-friable

² Cond. = Condition Of Materials Either good, dam = damaged, sig. dam. = significant damage

³ NAD = No Asbestos Detected, Ch = Chrysotile, Am = Amosite, PT = Point Count Analysis

⁴ NESHAP Category - Regulated ACM (RACM), Cat I NF=Category I Non-Friable ACBM, Cat II NF= Category II Non-Friable ACBM.

TABLE 1 – SUSPECT ACMs - SAMPLED

Williams Country Club – Lodge

Survey Date(s): September 24, 2015

MATERIAL # & (# SAMP)	MATERIAL DESCRIPTION	MATERIAL LOCATION	F/NF ¹	COND. ²	% ACM & TYPE ³	EPA NESHAP CAT ⁴	EST. QTY.	EST. REMOVAL COST (\$)
WCC-26 (2)	Black/White Pattern 4" Floor Tile with Black Underlayment	2 nd Floor Bathroom	NF	Good	FT – NAD BU – NAD	NA	NA	NA
WCC-27 (2)	Felt Underlayment (under slate shingles)	Front Porch Roof	NF	Good	NAD	NA	NA	NA
WCC-28 (2)	Perimeter Caulking	Front Porch Roof	NF	Good	NAD	NA	NA	NA
WCC-29 (3)	Black Tar	Behind Slate Panels on Porch and Main Roof	NF	Good	10% Ch	CAT I NF	7,250 SF	\$21,750

¹ F = Friable; NF = Non-friable

² Cond. = Condition Of Materials

³ NAD = No Asbestos Detected; Ch = Chrysotile; Am = Amosite; PT = Point Count Analysis

⁴ NESHAP Category - Regulated ACM (RACM), Cat I NF=Category I Non-Friable ACBM, Cat II NF= Category II Non-Friable ACBM.

Either good, dam = damaged, sig. dam. = significant damage

PT = Point Count Analysis

Cat I NF=Category I Non-Friable ACBM, Cat II NF= Category II Non-Friable ACBM.

6 CONCLUSIONS & RECOMMENDATIONS

6.1 CONCLUSIONS

Asbestos-containing materials (ACMs) were found in the Williams Country Club Lodge, Weirton, West Virginia.

Assumed ACMs were not found in the Williams Country Club Lodge, Weirton, West Virginia.

Materials with low concentrations of asbestos (trace to 1%) were identified in the subject facility(s).

The identified or assumed ACMs were observed to be in good, damaged, condition at the time of the field investigation. Pipe Fitting and Pipe Insulation had localized damage in the basement.

6.2 RECOMMENDATIONS

ACMs should be maintained in a good non-damaged condition and periodically inspected through use of an Operations and Maintenance (O&M) program. Damaged or significantly damaged ACMs should be repaired, encapsulated, enclosed or removed.

Regulated ACM (RACM) must be properly removed by a licensed asbestos abatement contractor prior to renovations or demolition that would disturb the material. Federal, State and Local regulations and guidelines should be strictly adhered to when removing the ACM.

Category I & II Non-Friable asbestos containing material may often be left in place during demolition if not made friable by cutting, grinding or sanding. If left in place, these materials cannot be recycled, burned or used as clean fill.

Materials verified to contain low concentrations of asbestos (trace to 1%) are not considered ACM, and are not regulated by the EPA; however, some OSHA regulations will still apply based on the employee's airborne exposure.

In addition, prior to any future maintenance, renovation or demolition activities, any assumed ACMs should be tested. Any areas that were noted as being inaccessible during this project, or any concealed areas, such as behind walls, where suspect ACMs are discovered, will require a survey for ACM.

Prior to the initiation of a project that would involve abatement, a detailed engineering cost estimate and project design is recommended. The engineering cost estimate will incorporate such variables as scheduling and phasing of the project, the size and extent of the project, seasonal factors, operational factors and other restrictions, respiratory protection, alternate abatement options, and type of replacement material. An engineering cost estimate would also include professional fees, such as for project design and management, and other expenses, such as on-site air monitoring and construction supervision.

