



# The City of Morgantown

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 Morgantown, West Virginia 26505  
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 www.morgantownwv.gov

Office of the City Manager

## FY23 USEPA Brownfields Cleanup Grant Application

### Narrative Information Sheet

1. Applicant Identification: City of Morgantown, 389 Spruce Street, Morgantown, WV 26505
2. Funding Requested
  - a. Grant Type Single Site Cleanup
  - b. Federal Funds Requested \$500,000
3. Location: Morgantown, Monongalia County, West Virginia
4. Property Information: White Park Southside, 1001 Mississippi St., Morgantown, WV 26501
5. Contacts
  - a. Project Director: **Vanessa Reaves**, Special Projects Coordinator for the City
    - i. Phone: 304-225-4218
    - ii. Email: [vreaves@morgantownwv.gov](mailto:vreaves@morgantownwv.gov)
    - iii. Mailing Address: 430 Spruce Street, Morgantown, WV 26505
  - b. Chief Executive/Highest Ranking Elected Official: **A. Kim Haws**, City Manager
    - i. Phone: 304-225-4213
    - ii. Email: [khaws@morgantownwv.gov](mailto:khaws@morgantownwv.gov)
    - iii. Mailing Address: 430 Spruce Street, Morgantown, WV 26505
6. City of Morgantown Population: 30,347
7. Other Factors

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	
The proposed site is adjacent to a body of water. (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1,2,7,9
The proposed site(s) is in a federally designated flood plain.	
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed cleanup site will incorporate energy efficiency measures.	7

The reuse strategy or project reuse of the proposed site considers climate adaptation and mitigation measures.	7
The target area is located within a community which a coal-fired power plant has recently closed (2011 or later) or is closing.	1

8. Releasing Copies of Applications

The City of Morgantown requests that contact information (email and phone numbers) for Project Partners in Section 2.b.i remain confidential.

# 1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

## a. Target Area and Brownfields

### i. Overview of Brownfield Challenges and Description of Target Area

The City of Morgantown is the third-largest city in West Virginia, sitting 60 miles south of Pittsburgh along the banks of the Monongahela River. Its municipal infrastructure supports an estimated daily population of nearly 70,000, formed by a mix of over 30,000 residents and more than 140,000 in the MSA. The only of the top 5 largest cities in West Virginia to have witnessed any population growth over the past twenty years, Morgantown serves as its MSA's principal city and the seat of Monongalia County. Morgantown is the regional center of finance, medicine, commerce, and education. The city hosts an average fall enrollment of nearly 26,000 students at West Virginia University's (WVU) flagship campus and is the headquarters of West Virginia's largest employer, WVU Medicine.

Chartered in 1785, Morgantown has hosted several industrial booms and remains a busy port city serving active, nearby mining and gas industries. Discovery of fossil fuels in the surrounding area led to the city's first major growth and through-service expansion of the B&O Railroad in the 1890s. Industrial corridors developed along the mountainous city's natural valleys, which have transformed from glass, tin, and sheet metal factories in the early to late 1900s to dense commercial and residential corridors today. In the late 1990s, two railroads bisecting the city were land-banked and transformed into now-beloved, recreational rail-trails.

A recent study by researchers at WVU and the University of Tennessee found that, even with its relatively diversified economy, Monongalia County exhibits a high dependence on the coal industry ecosystem and is at high risk of experiencing economic hardship due to the continued decline of the coal industry. ([Bowen, et al., 2018](#)). The area has already experienced significant hardship due to shifting energy markets. Several mines and two of the five coal fired power plants within 25-miles of the project site have been shut down within the last decade. The legacy of these and other industrial sites weighs on Morgantown's development and contributes to a broad sense of disempowerment within its vulnerable communities.

White Park is a 170-acre greenspace nestled between multiple neighborhoods on the City's south side. The park boasts five ball fields, basketball courts, an ice rink, picnic shelters and, by some counts, upwards of 17 miles of trail - both sanctioned and unsanctioned - in what has been described as the densest and most labyrinthian trail network in the entire state. Although the park is one of the busiest greenspaces in the City's network, an industrial past hinders recent desires to modernize, expand, and correct some of the extreme deficiencies in its trail system. From the 1890s until the 1950s, the property was part of the larger South Morgantown Tank Farm which, at its operational height, stored around two million gallons of crude oil in nearly 70 tanks. Assessment and cleanup efforts have mitigated risk for users in the more formally developed areas of the park, but approximately 88 undeveloped acres remain impacted by legacy pollution from petroleum contamination. This cleanup grant will help the city reduce unacceptable visitor risk by building a trail system that integrates risk reduction remedies. The risk reduction remedies will combine traditional capping of areas of concern with a more novel approach of directing users to mitigated areas of the park through the principles of modern and sustainable trail design.

### ii. Description of the Proposed Brownfield Site(s)

The White Park Southside (WPS) (the Site) comprises 21-acres along the southern portion of the City's 170-acre White Park (the park). It is within City limits, situated mostly south of the Cobun Creek reservoir, the City's secondary drinking water source operated by the Morgantown Utility Board (MUB). The park is surrounded on the north and east by residential neighborhoods. South Middle School and Monongalia County Technical Education Center campuses are also to the northeast, immediately adjacent to White Park. The park is bound on the south and west by Greenbag Road and Route 119, respectively. The City acquired the land in 1973 as part of a succession of transfers of real estate that eventually formed White Park. Immediately prior to the City's ownership, the Site, the rest of White Park lands, and several other surrounding properties sat largely vacant for decades after the decommissioning of Eureka Pipeline Company's 700-acre South Morgantown Tank Farm. The

Tank Farm began crude oil storage operations around 1890 and operated throughout the first half of the 20th century. Although largely abandoned by the late 1940s, a handful of aboveground storage tanks (ASTs) remained, at least two of which were on the Site, and may have been used for other purposes into the early 1970s. Aerial imagery and other records suggest the farm once housed at least 64 ASTs, with a total capacity of at least 2 million barrels. Primary and secondary containment berms formed by large earthen dikes largely remain, suggesting at least 6 of these ASTs previously existed on the Site and at least 38 existed in White Park.

In 1958, the Morgantown Water Commission constructed a dam to form a drinking water reservoir immediately adjacent to the Site. In 2016, concerns with the reservoir's capacity to service the area's water needs prompted the Water Commission's successor, MUB, to begin constructing a new and much larger reservoir several miles upstream. In 2019, MUB placed a raw water line through the WPS to connect the new reservoir, still under construction, to the municipal drinking water treatment plant just downstream at the confluence of Cobun Creek and the Monongahela River.

Since the 1980s, multiple environmental assessments have been conducted within White Park, resulting in a CERCLIS listing as WVD988766168. Elevated concentrations of metals, particularly Arsenic, and PAHs in soil, surface water, and sediment were identified. In 2010 a site inspection identified free product near a former tank within the WPS area, and approximately 1,300 cubic yards of soil was removed. In 2018, the City confirmed with EPA Region 3 that the site was archived as No Further Remedial Action Planned (NFRAP) status and is not listed on the National Priorities List (NPL). A 2019 Phase II Assessment was completed during MUB's installation of the waterline. In 2022, a limited Phase II ESA was performed prior to planned construction of the proposed WPS trail. The Phase II identified Arsenic and PAHs above state recreational screening levels and to protect human health and the environment, the City entered the Site into the West Virginia Voluntary Remediation Program (WV VRP). The VRP agreement was executed in October 2022 and site assessment sufficient to begin cleanup is complete.

## **b. Revitalization of the Target Area**

### **i. Reuse Strategy and Alignment with Revitalization Plans**

Reuse strategy for the Site centers on strategic development of a 1.9-mile trail loop, intentionally designed with a cover to mitigate risk to users. The sanctioning of a formal trail in this section of the park will discourage unsanctioned trail development and soil excavations, which cause undue ecological damage and unacceptable exposure to Arsenic and PAHs in soil. It will also direct users – with signage, native vegetation that form thick barriers, and limited fencing – to mitigated areas of the park.

The reuse strategy is rooted in the community organization following MUB's 2016 announcement of the proposed water line route through the previously undeveloped WPS. In a series of publicly recorded meetings and work sessions, numerous at-large community members and organizations (including current project partners such as: the White Park Trail Advisory Group, First Ward Neighborhood Association, Morgantown Greenspace Coalition, South Middle School Bike Club, and Morgantown Trail Hawks) joined with City leadership represented by City Council, the Board of Parks and Recreation, and MUB. These events continued through the first two years of the Covid-19 pandemic and included live-stream, re-broadcasted events and several outdoor site tours facilitated by the WVU's Brad and Alys Smith Outdoor Economic Development Collaborative (WVU-OEDC). Collectively, these groups organized to prioritize restoration and redevelopment strategies for the WPS, recognizing an opportunity to implement a new management approach for maximizing use of limited greenspace and correcting legacy issues caused by White Park's soil contamination and network of unsanctioned and loosely managed trails. In 2020, the City, with continued support from WVU's-OEDC, engaged a Professional Trail Builders Association contractor to incorporate the expressed community need into a trail design for the WPS.

These events fell within the backdrop of a growing community demand for recreation and alternate transportation routes that had spurred significant planning efforts focusing on development and expansion of the City's existing trail network. Morgantown's 2013 Comprehensive Plan, 2020 Regional Bike/Ped Plan, 2020-2022 Strategic Plan,

and others prioritize reuse and revitalization strategies for blighted properties. The Strategic plan's first goal, Attractive Amenities, centers its objectives around creating safe, clean, and new greenspaces, family friendly resources, and recreational opportunities. Recreational trails and related infrastructure are widely considered strategic investments in communities wishing to transition their economies and retain their workers. WVU-OEDC, in conjunction with the State of West Virginia, recently launched an aggressive remote worker program that is centered around attracting new residents by showcasing West Virginia's outdoor recreation. Morgantown is the host city for the first class of these remote workers.

Morgantown is well positioned to develop new, connected recreational sites and trails by leveraging its keystone network of rail-trails. Construction of the White Park Southside Trail will serve as the City's first phase in this regional and multi-agency redevelopment effort. The cleanup will showcase an innovative and technically sound approach as a blueprint for future successes in the rest of White Park and in other blighted areas.

ii. **Outcomes and Benefits of Reuse Strategy**

Morgantown's outdoor economy is rapidly growing and diversifying as some of our other industries fade. WVU's recent launch of a graduate program in sustainable trails development, the opening of new modern trail systems on WVU land, and our combined regional trail planning efforts have caused the City to reflect on its legacy trail systems. Our extreme topography – coupled with dense development on narrow roads that often lack bike/ped facilities – has led to our trails serving an outsized role in resident connectivity to recreation and to low-stress transportation corridors. However, our current City trails fail to serve our community equitably through their general haphazard condition, poor design, and lack of connection to destinations. Completing the reuse plan will provide new important trail connections for an underserved community, give the City a template for modern trail development to improve and expand its other trails, help build on the momentum of WVU's recent trail investments, improve public perception of stakeholder cooperation and effectiveness, provide more accessible trails for a more diverse set of visitors, and help jumpstart the creation of local trail construction firms to provide new economic opportunity for workers displaced by the declining coal economy. As the home of WVU, residents and transients are educated here at the state's flagship university but are often forced to leave for lack of economic opportunity. Development of the WPS trail will help Morgantown grow its economy and succeed against growing competition from other towns that have invested in trail tourism and community recreation.

c. **Strategy for Leveraging Resources**

We (the City) will commit (not seek reimbursement for) costs of staff project oversight and administration of this grant. As described in Section c. iii. of the grant, this is expected to amount to \$52,080 - roughly 868 hours over four years at \$60/hour.

i. **Resources Needed for Site Characterization**

The WVDEP will commit funding from its current Brownfield Assessment Grant to the City for additional site assessment if needed, although no need is expected. The WV Land Stewardship Corporation (LSC) already committed \$67,380 to the Site in its FY19 Brownfield Assessment Grant. The remaining LSC funds will finalize risk assessment through the VRP before EPA grant awards are announced in late spring FY23.

ii. **Resources Needed for Site Remediation**

WVDEP will commit up to \$170,000 from its Brownfields Revolving Loan Fund low-interest loan program to help complete remediation if needed. The City will cover any additional funding gaps for remediation.

iii. **Resources Needed for Site Reuse**

On a costs incurred basis, MUB has agreed to cover tree replacement to aid in planting of disturbed areas, design and construction of the new trail bridge to link the Site to the rest of White Park. A planned sewer line replacement in early winter 2022 on the site will yield additional commitments to cover costs for other Site and access improvements needed to complete the reuse plan. The City will cover project oversight and administration, and

OEDC will cover any additional technical planning needs for trail design on the Site, as well as training City and any consultant staff in the proper techniques for trail construction inspection.

iv. Use of Existing Infrastructure

The Site and its new trail system will directly connect to all existing White Park amenities, including parking, restroom facilities, lighting, and shelters. Although there are no plans for structures at the Site, adjacent parcels have existing water, sewer, natural gas, and electricity. Use of an existing construction laydown area and old roadbed will limit impact of the planned new parking and access road. The primary and secondary containment berms will continue to serve a good canvas for dynamic and modern trail development. After remediation, actual tank sites will serve as programmed and educational areas that require minimal grading and clearing for flatter ground (a relative rarity in Morgantown).

**2. Community Need and Community Engagement**

**a. Community Need**

i. The Community's Need for Funding

The City of Morgantown has significant financial need due to a variety of factors, including a weak housing market attributing to low property values (55% of housing is renter-occupied and approximately 50% of Morgantown’s housing was built prior to 1960). The median home value is also less than the national average by approximately \$15,000. Urban sprawl and a large state university have created a large, occupied area as well as other costly impacts such as higher municipal services costs, while detracting to the overall tax base. The residents of Morgantown also have significantly lower median household incomes (\$42,474 compared to \$64,994 nationally), and an extremely high poverty rate at 34.7% (compared to a national rate of 11.6%). ([Neighborhoods at Risk](#)). These examples demonstrate the lack of local funding opportunities.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

EJScreen shows several other environmental indicators for Tract 110 exceeding State and/or national values:

<b>Environmental Indicator</b>	<b>Tract 110 Value</b>	<b>State Value</b>	<b>National Value</b>
Ozone (ppb)	41.4	39.9	42.5
Diesel Particulate Matter (µg/m )	0.167	0.129	0.294
Air Toxics Cancer Risk* (lifetime risk per million)	30	29	28
Traffic Proximity (daily traffic count/distance to road)	360	250	760
Lead Paint (% Pre-1960 Housing)	0.38	0.34	0.27
RMP Facility Proximity (facility count/km distance)	1.8	0.5	0.77
Hazardous Waste Proximity (facility count/km distance)	3.9	0.83	2.2
Underground Storage Tanks (count/km )	3.5	2	3.9

Visitor awareness of White Park’s industrial past is now rapidly fading – the tank farm’s decommissioning began at least 80 years ago. Unsanctioned and unplanned trail building occurs frequently within the park and on the Site, often performed by neighborhood teenagers seeking to develop trail features that meet their developing experience levels. The Site’s soil contaminants-Arsenic and PAHs-are both carcinogens and respiratory stressors ([ATSDR, 2007,1995](#)). Exposure occurs through inhalation, ingestion, and dermal contact. Elevated breathing and contact with soil during exercise and hand excavation dramatically increase community exposure to the Site’s soil contaminants. Cleanup of the Site will reduce community exposure to carcinogens where exposure to ozone, diesel particulate matter, Air Toxics, and proximity to traffic, RMP Facilities, and Hazardous Waste facilities is already above state or national averages.

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

West Virginia has the highest rate of obesity (39.5%), the highest rate of cardiovascular disease (15.5%), the sixth highest rate of cancer (14.1%), and the second highest rate of residents considered in fair or poor health (26.3%). Even within Monongalia County, which many perceive as “better off” than the rest of the state, 62.7% of residents are considered obese or overweight, and 20.2% do not participate in physical activities. The cancer rate in Monongalia County is 8.5%. 9.1% of residents have asthma. ([WVDHHR, 2018](#))

As discussed in Section 2.a.ii.(1), cleanup of arsenic and PAHs in Site soils will decrease community exposure to contaminants known to exasperate cancer and asthma. Environmental remediation of sites for expansion trails and other outdoor recreation opportunities will also provide additional exercise options and ways to address obesity rates, leading to improvement in overall health and addressing the top concerns of county residents.

### (3) Promoting Environmental Justice

Within Census Tract 110, which contains the Site, 50% of the population is low income, around 20% of families with children live in poverty (twice that of Morgantown as a whole and three times the national rate).

While Morgantown is predominantly white, Census Tract 110 has a higher percentage of Black or African American and Hispanic or Latino residents than the surrounding areas. Low-income and minority populations bear a disproportionate amount of the burden of the negative environmental impacts of industrial legacy, and multiple studies have determined that poorer Americans are less likely to have access to outdoor recreation at home and less likely to participate in outdoor recreation activities ([Scott, 2013](#)).

EJScreen also considers Tract 110 a food desert. The trail through the White Park Southside area will help connect neighborhoods that sit north of the reservoir to a full-service grocery store south of the reservoir, reducing by half the current 30-minute walk mostly along roads with no sidewalks. In a tract where an estimated 10% of households do not own a car (neighborhoods at risk), this trail will add a more direct and safer route to groceries.

Remediation of the site and implementation of the recreational use at the site will promote environmental justice by targeting an area with higher populations of people of color and the population with low income. The disadvantaged/EJ communities surrounding the property will be included in discussions regarding end use to ensure the intended outcome of promoting environmental justice in the community.

#### **b. Community Engagement**

##### **i. Project Involvement & ii. Project Roles**

The City of Morgantown [1] (Grantee) has worked for years with several partners to identify and address issues and opportunities at the site and within White Park at large. Both the Morgantown Utility Board [3] and the Board of Parks and Recreation Commissioners [2] have binding and/or chartered agreements to assist with the remedy and reuse. BOPARC will serve as the Site’s long-term operations and programmatic manager.

During the project, BOPARC will provide on-site meeting venues and will help direct the participation of various trail user groups, including the White Park Trail Advisory Group [11], the Greenspace Coalition [10], the Morgantown Area Mountain Bike Alliance [7], the Morgantown Trail Hawks Scholastic MTB Team [9], and the South Middle Bike Club/Outride Program [8]. The First Ward Neighborhood Association (representing White Park’s neighborhood) will also aid in wide outreach for community input meetings and project milestones. All these groups have already given input on their general needs for trail design during cleanup planning. During the project, they have all committed to help contracted signage designers review the legibility and understandability of proposed wayfinding and educational signage.

West Virginia Land Stewardship Corporation [6] dedicated funds from their 2019 Brownfield Assessment Grant to complete a 2022 Phase II ESA for the Site. The WVU-OEDC [4] has assisted in review of Site trail planning/design will help the City create draft trail construction bid packages. The Northern Brownfields Assistance Center [5] has assisted with review of this grant application and general technical planning and commits to doing similarly in the future.

Org. #	Contact Name	Email	Phone
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\*First Ward Neighborhood Resident

### iii. Incorporating Community Input

The City will seek to deepen its understanding of park user and nearby resident experiences, desires, and concerns to ensure the cleanup and reuse matches with community need. We plan to integrate project discussion and information dissemination into existing City, MUB, BOPARC, neighborhood, and other public meetings. We will include announcements for future project specific meetings (at least three before on-site cleanup to allow for incorporation of input) and methods available for providing input. Materials and public documents will be available via meeting handouts published in accordance with WV sunshine laws. Communication materials will be written in plain language. An existing webpage on the City's website already serves as a hub for project information. We will prepare a Community Involvement Plan (CIP) at the notice of award if the project is selected by EPA for funding, built on lessons from the 2016-2022 waterline restoration and WPS trail plan community engagement process. The CIP will outline a series of on-site outdoor and in-person meetings to gather community input and participation. For at least one month preceding the first meeting, the City will solicit input from at-large community members, organizations, and park users through electronic messages posted to the project website, social media, and organization listservs. We will also use physical signs at trail heads and other strategic locations in the park – including neighborhood connectors, parking areas, and along existing trails – to solicit input with instructions to participate in person or by phone, email, or via QR code or paper survey boxes posted at the sign location. We will post written responses to reviewed input from the initial outreach to the same outlets in advance of the first meeting. The first meeting is planned for an indoor BOPARC venue, walkable to White Park. Print or electronic maps of the proposed cleanup approach will be displayed for facilitating discussion of the ABCA. We will work to accommodate any language barriers that may arise - over 98% of the population in the area speaks English as a primary language. Project contact telephone numbers and e-mail addresses will be provided through all communications to allow access for members of the public to ask questions, express concerns, and provide input. The City will maintain a repository at the City Hall Annex and Morgantown Public Library and post periodic updates to the project website and stakeholder listservs.

## 3. Task Descriptions, Cost Estimates, and Measuring Progress

### a. Proposed Cleanup Plan

The City will perform cleanup overseen by the WV Voluntary Remediation Program (VRP) to ensure regulatory compliance and to have better community control over the cleanup methods and outcomes. It will combine remedy and reuse activities into an integrated process to hasten the already delayed reuse and make the most efficient use of limited financial and physical resources (land). The integrated process will center around the development of a recreational trail system that meets the demonstrated needs of the community and user groups, while ensuring protection of human and ecological receptors and the Site's mature forests.

The recommended cleanup -Alternative 4 from the ABCA- utilizes a combination of risk assessment and exposure pathway elimination through construction of protective cover in accordance with the VRP's Cap and Cover Guidance. It integrates cover activities directly with the 2020 WPS trail plan, which was developed from the 2016-2020 community engagement process and which follows best design principles of the Professional Trail Builders Association (PTBA) and the International Mountain Biking Association (IMBA). Integrating remedy and reuse will be substantially lower cost and easier to implement than other alternatives. It achieves these efficiencies with the light construction footprint associated with modern trail building. First, the plan utilizes the narrow, linear trail corridor for access and materials handling during trail and cover construction. This eliminates the need to construct additional access roads (that would themselves need to be restored) required by more traditional remedies using off-site soil disposal and/or hauling of clean fill. Second, the smaller, light duty equipment utilized by professional trail contractors is more fuel efficient and creates less general ecological disturbance and surface impacts. Third, trail construction is performed linearly and stabilized daily, resulting in smaller areas of concurrent disturbance. This allows use of less impactful stormwater management practices – avoiding the need for retention ponds.

These characteristics allow the project to minimize the large tree removal and other habitat destruction sometimes expected with traditional cleanups. The proposed cleanup will eliminate the time and expense of replacing trees and dramatically reduce the time and resources needed to complete restoration. Lower ecological disruption of existing vegetation and lower impacts to the long-term stability of soils surrounding the Cobun Creek Reservoir are important aspects of how the cleanup plan provides resiliency against stresses induced by climate change. Current climate models for the Mid-Atlantic region – and, specifically, northcentral West Virginia – predict continued warming and an increase frequency and intensity of extreme precipitation events. An increase in precipitation abundance is predicted overall but shifting patterns will stress water availability for human and ecological consumers. These conditions likewise stress local government's ability to provide a sufficient quantity and quality of drinking water. This plan will help mitigate the stresses – increased rates of erosion and supply variations – that climate change places on the Cobun Creek Reservoir.

Cleanup effectiveness and long-term reliability will be ensured through completion of a VRP-approved Human Health and Ecological Risk Assessment and Remedial Action Work Plan. It will reduce current site risks posed by exposure to soil contaminants through proper closure and ecological restoration of over 1,750 linear feet of unauthorized trails and excavations. Future exposure to soil contaminants will be mitigated by constructing 9,871 linear feet of new, primarily natural surfaced trail tread and features, that meets VRP-approved protective cover criteria where indicated by risk assessment, through a fully assessed and cleaned up trail corridor. The trail corridor will be a VRP-approved engineering control enforced through a Land Use Covenant (LUC). The LUC will prescribe a routine schedule for inspection and maintenance of the WPS trail corridor. The City and BOPARC will maintain the LUC and ensure the long-term effectiveness of the cleanup plan.

## **b. Description of Tasks/Activities and Outputs**

### **Task 1: Project Oversight**

*i. Project Implementation:* The Project Manager will be responsible for the overall execution and management of the project. She will track tasks, schedule, and budget; procure and oversee the QEP, a WV Licensed Remediation Specialist (LRS) and cleanup contractors; and report on project activities and accomplishments to stakeholders. The LRS will support reporting activities and will develop a Final Cleanup Report to document all project activities.

*ii. Anticipated Project Schedule:* October 2023 – October 2027

*iii. Task/Activity Lead:* City Special Projects Coordinator, LRS

*iv. Outputs:* 16 Quarterly Reports, 16 ACRES updates, administrative record, and 32 project status meetings, 3 Disadvantaged Business Enterprise (DBE) reports, 3 Federal Financial Reports (FFRs), 1 Final Cleanup Report and VRP Certificate of Completion.

## **Task 2: Community Outreach**

*i. Project Implementation:* The City's Project Manager will lead Community Outreach activities with support from the LRS. The Project Manager will plan and conduct a series of community meetings at key milestones throughout the project and provide monthly updates at public City Council and Board meetings. The City will maintain a repository at the City Hall Annex and Morgantown Public Library and post periodic updates to the project website and stakeholder list servs. The LRS will prepare a Community Involvement Plan, develop outreach materials, and facilitate public meetings.

*ii. Anticipated Project Schedule:* October 2023 – October 2027

*iii. Task/Activity Lead:* City Special Projects Coordinator, LRS

*iv. Outputs:* Community Involvement Plan, 4 Public Meetings, 4 information sheets, 4 website updates, 48 monthly reports to City Council and Boards.

## **Task 3: Cleanup Planning**

*i. Project Implementation:* The contracted LRS will lead cleanup planning activities and incorporate public comments to finalize the ABCA, provide specifications suitable for City bid documents and procurement of a cleanup contractors, prepare written responses to contractor comments, secure all necessary permits, and complete Voluntary Remediation Program reports such as the QAPP. The City's Project Manager, Staff Engineer, and LRS will hold bi-weekly progress meetings and participate in contractor procurement.

*ii. Anticipated Project Schedule:* January 2024, – October 2025

*iii. Task/Activity Lead:* LRS

*iv. Outputs:* final ABCA, bid documents and RFP, response to contractor comments, QAPP, permits, retained cleanup contractor

## **Task 4: Site Cleanup**

*i. Project Implementation:* The contracted LRS will perform risk assessment, prepare all required VRP report submittals, secure VRP approval for the cleanup plan, acquire any necessary permits, and oversee cleanup contractors during placement of protective cover. The LRS will create any land use covenants needed to meet applicable VRP risk-based standards and secure a Certificate of Completion for the site. The City's Special Projects Coordinator will perform oversight of trail construction cleanup contractors. As needed, the contractor will fill, grade, cover, pave, and implement other engineering controls identified in the VRP-approved Remedial Action Work Plan.

*ii. Anticipated Project Schedule:* October 2024– October 2026

*iii. Task/Activity Lead:* City Special Projects Coordinator, LRS

*iv. Outputs:* Human and Ecological Risk Assessment, Remedial Action Work Plan, Remedial Action Completion Report, Land Use Covenant, VRP-approved protective cover and trail system, as-built drawings, remedy education and historical signage, Final Report, and Certificate of Completion. 21 acres cleaned up and redeveloped with 9,871 liner-feet recreational trail.

### **c. Cost Estimates**

#### *Task 1 – Oversight*

-\$3,000 to attend WV Brownfield Conferences (\$350 for transportation, \$300 for registration, \$200 for lodging, \$150 per diem for two staff to attend x 3 years =\$3,000)

-Contracted QEP-160 hours x \$150/hour = \$20,000 to coordinate team meetings, prepare ACRES updates, and a Final Report

*Task 2 – Community Outreach*

-\$1,000 supplies (newspaper advertisements, posters, site signage, mailings, and graphics)

-\$10,000 for QEP: assist preparing the Community Involvement Plan (\$2,000), plan and facilitate public meetings (4 meetings at \$1,500 = \$6,000), and design electronic outreach materials (\$2,000)

*Task 3 – Cleanup Planning*

- \$9,000 for QEP: incorporate public comments and finalize the ABCA (10 hours at \$150/hour = \$1,500), provide specifications cleanup contractor Bid Documents (RFP) (20 hours at \$150/hour = \$3,000), plan and lead the pre-bid site meeting (10 hours at \$150/hour = \$1,500), prepare written responses to contractor comments (10 hours at \$150/hour = \$1,500), and secure all necessary permits (10 hours at \$150/hour = \$1,500).

*Task 4 – Cleanup*

-\$255,936.25 for 9,871 liner feet (lf) of diversion and VRP-approved protective cover trail at \$25.93/lf; \$17,500 for 1,750 lf trail closure and ecological restoration at \$10.00/lf; \$1,974 for 987 lf indicator layer at \$2.00/lf; and (\$27,541.03) for 10% contingency

-\$39,345 for 2 educational kiosks at \$5,000/each; 10 trail signs at \$750/each; 123 corridor blazes at \$15.00/each; -\$50,000 for Enhanced protective cover/elevated skills area feature

-\$37,000 for QEP: VRP Risk Assessment Report (80 hours), Remedial Action Work Plan (90 hours), Land Use Covenant (15 hours), oversight of engineering control installation (50 hours), Remedial Action Completion Report and Final Report (50 hours), NPDES BMP design (25 hours), Land Use Covenant Inspections (12 hours)

-\$7,100 for VRP oversight fees

-\$14,00 for Surveying (\$9,500) and As-built documents (45 hours x \$100/hour = \$4,500)

Budget Categories	Project Tasks (\$)				
	Oversight	Community Outreach	Cleanup Planning	Site Cleanup	Total
<b>Direct Costs</b>					
<b>Personnel</b>	\$0	\$0	\$0	\$0	\$0
<b>Fringe Benefits</b>	\$0	\$0	\$0	\$0	\$0
<b>Travel*</b>	\$3000	\$0	\$0	\$0	\$3000
<b>Equipment**</b>	\$0	\$0	\$0	\$0	\$0
<b>Supplies</b>	\$0	\$1000	\$0	0	\$1000
<b>Contractual</b>	\$20000	\$10000	\$9000	\$456596	\$495596
<b>Other</b>	\$0	\$0	\$0	\$0	\$0
<b>Total Direct Costs</b>	\$23000	\$11000	\$9000	\$456596	\$499596
<b>Indirect Costs</b>	\$0	\$0	\$0	\$0	\$0
<b>Total Federal Funding (Not to exceed \$500,000)</b>	\$23000	\$11000	\$9000	\$456596	\$499596
<b>Total Budget</b>	\$23000	\$11000	\$9000	\$456596	\$499596

**d. Measuring Environmental Results**

The City and LRS will update ACRES at least quarterly to track progress with task outputs and use of grant funds throughout the grant period. We will measure work progress during bi-weekly calls or on-line meetings utilizing spreadsheets and web-based tools. The City will update the public during monthly City Manager Reports to Council, Boards, and community stakeholder groups; community meetings; and periodic updates to the project website. During cleanup, the City and LRS will perform direct oversight of remediation contractors to ensure specifications are met and will produce daily reports. All VRP documents, such as the Remedial Action Completion and Final Reports, will be available in the public repository. Key project outcomes will include

elimination of unacceptable ecological and community exposures to arsenic and PAHs; redevelopment of 21-acres as recreational greenspace to meet community need and planning objectives; ecological restoration of brownfield property bordering the Cobun Creek Reservoir; rebuilding public confidence in site safety through a public cleanup under EPA and VRP oversight; durable educational kiosks and trail signs that communicate the area history that caused contamination and champions the success of the cleanup and reuse strategy; a reproducible cleanup and reuse model for the rest of White Park and other City recreation properties; successful leveraging of funding commitments for site reuse.

#### **4. Programmatic Capability and Past Performance**

##### **a. Programmatic Capability**

##### **i. Organizational Structure (combined 4.a.i-iii)**

The City of Morgantown has extensive project and grant management experience. **Vanessa Reaves (MS, Environmental Science)** is the City Manager’s Special Projects Coordinator. Several of the projects she manages for the City have a budget between \$100K-\$500K and are grant funded. Ms. Reaves has worked as a project manager for environmental consulting firms, ensuring regulatory compliance and obtaining necessary permits, documentation, and reporting. She will serve as the grant’s Project Manager. **Drew Gatlin (BS, Civil Engineering)** is the City’s Staff Engineer in its department of Public Works & Engineering. He and Ms. Reaves have co-managed all planning for the Site due to his extensive familiarity with the Site and its stakeholders. He regularly designs, reviews, bids, administers, and manages City capital and maintenance projects with budgets in excess of \$1M, including several Transportation Alternatives and Recreational Trails Program grants. The nature of his and Ms. Reaves’ jobs place them both in daily contact with citizens and citizen groups, building rapport with sensitive communities. The City’s grant writer, **Robyn Hess**, has over thirty years of grant writing experience. The City’s large Finance Department will review and approve grant drawdown requests and record funds received in the appropriate revenue line for the grant. Vanessa Reaves reports to the Assistant City Manager, **Emily Muzzarelli**, a PE who holds over a decade of experience working on federal projects. Drew Gatlin reports to **Damien Davis**, a PE with over twenty years of experience in civil engineering and project management in West Virginia. The WV Brownfields Assistance Center will provide project management and technical assistance in a supporting role. MUB, a project partner and recipient of a FY22 clean-up grant, will also be available for assistance.

All named project staff (and the City in general) have *extensive experience* procuring and managing contractors and consultants through the state of West Virginia’s 5G process and will be sure to follow all competitive procurement standards in 2 CFR 200.317-326 when hiring additional needed contractors. This team has the experience needed to complete the project within the planned 3-year timeframe.

##### **b. Past Performance – i. Has Previously Received an EPA Brownfields Grant**

##### **(1) Accomplishments**

The City received a \$200,000 Brownfield Assessment Grant in 2014, using funds to conduct five Phase I Environmental Site Assessments (ESA) and two Phase II ESA on five properties. The Dinsmore Tire location – covered by one of the grant-funded Phase II ESAs – recently received a FY22 Cleanup Grant for redevelopment activities under MUB. The second location with a Phase II ESA, the Beechurst Corridor, also included a Site Reuse Plan: the *Sunnyside Neighborhood Brownfields Redevelopment Plan*.

##### **(2) Compliance with Grant Requirements**

The City complied with all grant work plans, schedules, and terms and conditions as mandated by granting agency guidelines. We received a six-month extension to complete reporting and grant close out activities. No funds were remaining when the FY14 grant closed. The City has a long history of timely and complete grant reporting as required by each grantor’s guidelines and procedures, including decades of compliance with diverse federal grant.

# Threshold Criteria for Cleanup Grants

## 1. Applicant Eligibility

The applicant is the City of Morgantown, West Virginia. Morgantown is a Unit of Local Government as defined under 2 CFR § 200.64, and is therefore an eligible entity for a Cleanup Grant.

## 2. Previously Awarded Cleanup Grants

The City of Morgantown has not previously received EPA cleanup grants.

## 3. Expenditure of Existing Multipurpose Grant Funds

The City of Morgantown does not have an open EPA Brownfields Multipurpose Grant.

## 4. Site Ownership

The City of Morgantown is the fee simple, sole owner of the White Park Southside cleanup site. The City acquired the property through purchase.

## 5. Basic Site Information

- a. White Park Southside
- b. 1001 Mississippi St., Morgantown, WV, 26501
- c. The City of Morgantown is the current owner of the site.

## 6. Status and History of Contamination at the Site

- a. The White Park Southside property is contaminated by petroleum.
- b. The site was part of the 700-acre area that was operated as crude oil tank farm by Standard Oil from the late 1800s to the 1950s. The site was purchased by the City of Morgantown in 1973 and is currently managed as a city park. The area of the site is an undeveloped area of the park, with no recreational amenities.
- c. Environmental concerns included elevated concentrations of arsenic and the polycyclic aromatic hydrocarbons (PAHs) benzo[a]anthracene, benzo[a]pyrene, benzo[b]fluoranthene, benzo[k]fluoranthene, dibenz[a,h]anthracene, and indeno[1,2,3-cd]pyrene in the shallow soil.
- d. Contamination occurred when the site was part of the crude oil tank farm, and was likely the result of spills or leaks from the large storage tanks. The contamination is generally located within the containment berms that were constructed around the tanks.

## 7. Brownfields Site Definition

The sites meet the definition of a brownfield under CERCLA § 101(39). (a) The site is not listed, nor is it proposed for listing on the National Priorities List. (b) The site is not believed to be subject to Federal unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA. And (c) The site is not subject to the jurisdiction, custody, or control of the US government.

## 8. Environmental Assessment Required for Cleanup Applications

A Phase II Environmental Site Assessment Report was completed for the White Park Southside Trail Property on May 31, 2022. The report was prepared for the City of Morgantown and the West Virginia Land Stewardship Corporation, who paid for the assessment from their 2019 Brownfields Assessment Grant Number BF-963692-02-1-0.

## **9. Site Characterization**

The White Park Southside property is eligible to be enrolled in a regulatory program. The site was enrolled in the West Virginia Voluntary Remediation Program on October 5, 2022. West Virginia Department of Environmental Protection Brownfields Coordinator provided a State Environmental Authority Acknowledgement Letter on November 1, 2022 certifying that there has been a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin on the site. This letter is included in this application.

## **10. Enforcement or Other Actions**

The site is not subject to any ongoing or anticipated environmental enforcement actions.

## **11. Sites Requiring a Property-Specific Determination**

It is not believed that a Property-Specific Determination is needed. The West Virginia Department of Environmental Protection Brownfields Program Manager provided a Written Determination, Petroleum Property Eligible for Brownfields Grant Funding letter dated January 11, 2022. The letter is attached to this application.

## **12. Threshold Criteria Related to CERCLA/Petroleum Liability**

### **12.b Property Ownership Eligibility - Petroleum Sites**

A State Eligibility Determination letter has been attached to this application.

## **13. Cleanup Authority and Oversight Structure**

### **13.a. Cleanup Oversight**

White Park, which includes the White Park Southside property, was accepted into the West Virginia Voluntary Remediation Program as VRP Project #22015 on October 5, 2022. A Voluntary Remediation Agreement was executed for the site on October 24, 2022. The WVDEP Office of Environmental Remediation (OER) administers the WV Voluntary Remediation Program (VRP) and provides regulatory oversight for all brownfield cleanup projects. The program provides a Certificate of Completion to applicants who successfully demonstrate their site has met the state's most current risk-based human health and ecological standards, which are reviewed annually and published as the WVDEP VRP De Minimis Standards and Relevant Benchmarks within Interpretive Rule 60CSR9. The WVDEP OER and its predecessor have been actively engaged with site assessments at White Park since 1988, and were specifically consulted for the 2019 and 2022 Phase II environmental site assessments performed prior to the site's acceptance into the VRP.

Cleanup of sites under the VRP must be supervised by a WV Licensed Remediation Specialist (LRS) who is certified by the VRP. The City will contract with a LRS as its qualified environmental professional (QEP) to oversee and complete the cleanup of the site through a competitive process in accordance with the competitive procurement provisions of 2 CFR 200, EPA's rule at 2 CFR 1500 and the City's procurement requirements.

### **13.b Access to Adjacent Properties**

The Site's northern section can be accessed directly from a City-owned and maintained street (Mississippi Street). The Site's southern section can currently be accessed through a business park owned by Commercial Land Development, Inc. (CLD). Access through this parcel has been guaranteed since the 1958 construction of the reservoir dam and its access road. MUB secured additional easements through the CLD to facilitate installation of the 2019 waterline and to conduct associated restoration activities. In preparation for the 2022 Phase II ESA, the City executed a temporary construction easement with CLD to allow site assessment of planned trail alignments that extend beyond City-owned

property boundaries. In May 2022 the agreement with CLD was updated to a permanent, 20-foot wide, publicly accessible, easement to ensure unencumbered access to the Site during cleanup and planned reuse of the site as the WPS trail. Construction of the trail bridge from the northern to the southern section will allow direct access to the entire site from City-owned parcels.

#### **14. Community Notification**

##### **14.a Draft Analysis of Brownfields Cleanup Alternatives**

A draft Analysis of Brownfield Cleanup Alternatives (ABCA) was prepared for the site and is attached to this application.

##### **14.b Community Notification Ad**

Community notification advertisements were published on the City's website and in the following local newspaper of record: The Dominion Post on Wednesday November 2, 2022. A copy of this notice is attached.

##### **14.c Public Meeting**

On November 9, 2022, the intent to apply for an EPA grant was the subject of special public meeting. The public was invited to discuss this grant application and the ABCA. Nine people were in attendance. A copy of the meeting sign-in sheet, meeting notes, and responses to community questions and comments is attached to this application.

##### **14.d Submission of Community Notification Documents**

Associated documentation is attached to this application.

#### **15. Name Contractors and Subrecipients**

Contractors will be procured in accordance with State and Federal procurement requirements in an open competition upon receipt of award as per 2 CFR Part 200 and 2 CFR Part 1500. There are no subrecipients envisioned under this project.



west virginia department of environmental protection

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

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

November 14, 2022

Ms. Emily Muzzarelli  
City of Morgantown  
389 Spruce Street  
Morgantown, WV 26505

RE: State Environmental Authority Acknowledgement Letter  
FY23 U.S. EPA Brownfields Cleanup Grant Application  
EPA-I-OLEM-OBLR-22-09

Dear Ms. Muzzarelli,

Thank you for your continued efforts to further enhance the state's environment, economy, and quality of life by applying for a U.S. EPA Brownfields Cleanup Grant.

WVDEP agrees that this Cleanup Grant will ensure continued development, investment, revitalization, and success in the region, and will provide vital funding to ensure continued economic growth throughout Morgantown. The proposed trail will provide more recreational access but will also be used as a form of remediation in an area that is part of a historical oil tank farm that WVDEP and EPA have been monitoring since the 1980s. The WV Land Stewardship Corporation has utilized assessment funding to provide in-depth sampling of the Southside Trail. The areas of concern have been identified and documented along the trail route in the assessment report.

WVDEP affirms this site is eligible to be enrolled in WVDEP's Voluntary Remediation Program (VRP) and that the site has already enrolled into the voluntary program as of October 5, 2022. Additionally, there is a sufficient level of site characterization from the environmental site assessment performed to date at the site for the remediation work to begin on the site. Note that remediation work can begin on sites that have enrolled into WVDEP's VRP at any time provided that WVDEP is notified in writing.

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

Your partnerships with the Morgantown Utility Board and the Morgantown Board of Parks and Recreation, as well as your staff in the City of Morgantown, will ensure the master trail plan for the region will be a success.

As you prepare your application for this funding, the WVDEP Office of Environmental Remediation is in full support of your efforts. We are committed to assist you with remediating and redeveloping vacant, underutilized, and contaminated properties throughout Morgantown into productive and positive new uses. Please do not hesitate to contact me with any questions or needs.

Sincerely,

A handwritten signature in blue ink, appearing to read "Derek Hancock". The signature is fluid and cursive, with a horizontal line underneath it.

Derek Hancock  
WVDEP Brownfields Coordinator

WORK AUTHORIZATION (WA) WA No. 004

Prime Consultant: Environmental and Resources Consulting, LLC

The purpose of this Work Authorization is to describe the Services to be performed by Environmental Standards, Inc. (ENVSTD) under the current RECIPROCAL PROJECT BASED INDEPENDENT AGREEMENT between Environmental Resources Consulting, LLC (ERC) and ENVSTD, to set forth the basis for payment (Time & Materials, Lump Sum, etc.), estimated fee, and to document ENVSTD's agreement to perform the Services.

ERC and ENVSTD mutually agree that the Services described below are governed by terms and conditions set forth in the RECIPROCAL PROJECT BASED INDEPENDENT AGREEMENT currently in place between ERC and ENVSTD.

ENVSTD will act as the Sub Consultant to ERC.

**SERVICES:** (Scope of Work)

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White Park in Morgantown, West Virginia was part of an approximately 700-acre area occupied by a crude oil tank farm operated by Standard Oil (Pennzoil/Shell legacy). A portion of the former tank farm is owned by the City of Morgantown and operated as a recreational park. The City intends on improving the White Park property with approximately 6,000 linear feet of additional recreational trails. The City also intends to achieve a Certificate of Completion via the WV VRP to protect human health and the environment if contamination is present. Our scope may include Preparing the VRP application and agreement; preparing a Conceptual Site Model (CSM), Site Assessment Work Plan (SAWP), Quality Assurance Project Plan (QAPP), figures and tables, etc., that WVDEP requires for the; assist in preparing an Analysis of Brownfield Cleanup Alternatives (ABCA) that can be used to assist Morgantown to apply for a cleanup grant; and prepare any other documents/reports that are required under the VRP, this may include a Remedial Action Work Plan (RAWP). The timeline for all work to be performed/completed would be September 30, 2022.

**BASIS FOR PAYMENT:**

Time & Materials X \_\_\_\_\_

Lump Sum: \_\_\_\_\_

Other (describe): \_\_\_\_\_

**ESTIMATED FEE: NOT TO EXCEED: \$35,000.00**

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**AGREED ON BEHALF OF ERC BY:**



Printed Name:

Title: Owner/Manager

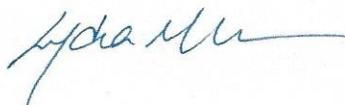
Signature:

Date: 3/28/2022

**AGREED ON BEHALF OF ENVSTD BY:**

Printed Name: Lydia M. Work

Title: Principal Chemist

Signature: 

Date: March 28, 2022



Marc Glass &lt;mglass@downstreamstrategies.com&gt;

---

**Fw: LSC/ERC to EnvStd White Park work authorization**

1 message

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**Drew Gatlin** <jgatlin@morgantownwv.gov>  
To: "mglass@downstreamstrategies.com" <mglass@downstreamstrategies.com>

Thu, Nov 17, 2022 at 2:48 PM

FYI

**J. Drew Gatlin (he/his)**

Staff Engineer

200 M-Tec Drive

Morgantown, WV 26501

Office: (304) 284-7411

Cell: (304) 719-7900

Fax: (304) 284-7409



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**From:** Dawn Seeburger <dawnseeburger@envres.net>

**Sent:** Monday, March 28, 2022 3:08 PM

**To:** Lydia Work <lwork@envstd.com>

**Cc:** 'Leah Mistick' <lmistick@envstd.com>; Vanessa Reaves <vreaves@morgantownwv.gov>; Drew Gatlin <jgatlin@morgantownwv.gov>; Jessica McDonald <jmcdonald@wvlsc.org>

**Subject:** RE: LSC/ERC to EnvStd White Park work authorization

Lydia,

Attached is the contract addendum for the \$35,000 we discussed today for use in assisting Morgantown with their White Park project's Voluntary Remediation Program (VRP) application, agreement, other associated VRPS reports/documents up to, and possibly including a Remedial Action Work Plan per the scope of work outlined in the attached. If anyone has any questions, please feel free to reach out.

Thanks,

Dawn

**From:** Lydia Work [mailto:[lwork@envstd.com](mailto:lwork@envstd.com)]  
**Sent:** Monday, March 28, 2022 12:29 PM  
**To:** Dawn Seeburger <[dawnseeburger@envres.net](mailto:dawnseeburger@envres.net)>  
**Cc:** Leah Mistick <[lmistick@envstd.com](mailto:lmistick@envstd.com)>; 'Vanessa Reaves' <[vreaves@morgantownwv.gov](mailto:vreaves@morgantownwv.gov)>; 'Drew Gatlin' <[jgatlin@morgantownwv.gov](mailto:jgatlin@morgantownwv.gov)>  
**Subject:** RE: LSC/ERC to EnvStd White Park work authorization

Attached, revised to be \$35K.

Lydia M. Work, LRS  
Principal Chemist

**Environmental Standards, Inc.**  
(o) 610.935.5577 ext. 406 • (m) 304.552.1442

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**From:** Dawn Seeburger <[dawnseeburger@envres.net](mailto:dawnseeburger@envres.net)>  
**Sent:** Monday, March 28, 2022 12:26 PM  
**To:** Lydia Work <[lwork@envstd.com](mailto:lwork@envstd.com)>  
**Cc:** Leah Mistick <[lmistick@envstd.com](mailto:lmistick@envstd.com)>; 'Vanessa Reaves' <[vreaves@morgantownwv.gov](mailto:vreaves@morgantownwv.gov)>; 'Drew Gatlin' <[jgatlin@morgantownwv.gov](mailto:jgatlin@morgantownwv.gov)>  
**Subject:** RE: LSC/ERC to EnvStd White Park work authorization

Lydia,

After we spoke earlier and I was finishing up our audit of funds, I found a significant error. Let's reduce the overall budget to \$35K rather than \$38K – as you utilize those funds and as the grant draws to a close we will be monitoring those dollars and may still be able to fund the entire \$38K – my apologies. Everything else looks fine.

Dawn

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**From:** Lydia Work [mailto:[lwork@envstd.com](mailto:lwork@envstd.com)]  
**Sent:** Monday, March 28, 2022 11:26 AM  
**To:** Dawn Seeburger <[dawnseeburger@envres.net](mailto:dawnseeburger@envres.net)>  
**Cc:** Leah Mistick <[lmistick@envstd.com](mailto:lmistick@envstd.com)>; Vanessa Reaves <[vreaves@morgantownwv.gov](mailto:vreaves@morgantownwv.gov)>; Drew Gatlin <[jgatlin@morgantownwv.gov](mailto:jgatlin@morgantownwv.gov)>  
**Subject:** LSC/ERC to EnvStd White Park work authorization

Hi, Dawn-

Attached is the requested work authorization for White Park. As we discussed, I specially added the completion of a Remedial Action Work Plan to allow flexibility in how the City best utilizes the funding.

Please let me know if you have any questions or need additional information.

Thank you!

Lydia M. Work, LRS

Principal Chemist

**Environmental Standards, Inc.**

1140 Valley Forge Road • PO Box 810 • Valley Forge, PA 19482

(o) 610.935.5577 ext. 406 • (m) 304.552.1442 • [www.envstd.com](http://www.envstd.com) • [lwork@envstd.com](mailto:lwork@envstd.com)

**Emergency Response Quality Assurance Hotline: 855.374.7272**

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**3 attachments**



**White Park ESI Addendum - 28 March 2022.pdf**

398K



**White Park VRP Tasks WA.pdf**

105K



**White Park VRP Tasks WA.pdf**

152K



Marc Glass &lt;mglass@downstreamstrategies.com&gt;

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**Fw: White Park - Supplemental Work Authorization**

1 message

**Drew Gatlin** <jgatlin@morgantownwv.gov>

Thu, Nov 17, 2022 at 2:47 PM

To: "mglass@downstreamstrategies.com" &lt;mglass@downstreamstrategies.com&gt;

FYI, no attachment was sent with these emails.

**J. Drew Gatlin (he/his)**

Staff Engineer

200 M-Tec Drive

Morgantown, WV 26501

Office: (304) 284-7411

Cell: (304) 719-7900

Fax: (304) 284-7409



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**From:** Vanessa Reaves <vreaves@morgantownwv.gov>**Sent:** Monday, August 1, 2022 2:30 PM**To:** Dawn Seeburger <dawnseeburger@envres.net>; Lydia Work <lwork@envstd.com>**Cc:** Jessica McDonald <jmcdonald@wvlsc.org>; 'Taylor Bennett' <tbennett@wvlsc.org>; Drew Gatlin <jgatlin@morgantownwv.gov>; Leah Mistick <lmistick@envstd.com>**Subject:** RE: White Park - Supplemental Work Authorization

Hi All,

This is wonderful news. Thank you all for supporting this great project to cleanup a major recreational area for the region. The City is working on the next phase of this project of releasing an RFQ for a master trail plan which will be used as a way to clean up the park.

Cheers,

Vanessa

**Vanessa Reaves**

Special Projects Coordinator

430 Spruce Street

[Morgantown, WV 26501](#)

Office phone: (304) 225-4218

Office hours: M-Th 8am-4:30pm. Closed on Friday

<https://recyclerightmorgantown.com/>



---

**From:** Dawn Seeburger <[dawnseeburger@envres.net](mailto:dawnseeburger@envres.net)>

**Sent:** Monday, August 1, 2022 11:03 AM

**To:** Lydia Work <[lwork@envstd.com](mailto:lwork@envstd.com)>

**Cc:** Jessica McDonald <[jmcdonald@wvlsc.org](mailto:jmcdonald@wvlsc.org)>; 'Taylor Bennett' <[tbennett@wvlsc.org](mailto:tbennett@wvlsc.org)>; Vanessa Reaves <[vreaves@morgantownwv.gov](mailto:vreaves@morgantownwv.gov)>; Drew Gatlin <[jgatlin@morgantownwv.gov](mailto:jgatlin@morgantownwv.gov)>; Leah Mistick <[lmistick@envstd.com](mailto:lmistick@envstd.com)>

**Subject:** White Park - Supplemental Work Authorization

Lydia,

As we discussed this morning, an additional \$32,379.65 is being released by the WV Land Stewardship Corporation for the White Park project to be used for grant eligible work under the VRP. Send me your authorization form for signature, and I'll turn that around quickly. This will effectively zero out the Petroleum portion of the WVLSC grant.

On another unrelated project, I will reach out to Leah Mistick in regard to updates on the Fairmont Phase I ESA status.

Cheers!

Dawn

Dawn E. Seeburger, LRS

3159 Coco Road

Elkview, West Virginia 25071

Office: (304) 965-9333

Cell: (304) 561-4159

From a 1984 Edward Abbey letter to a friend:

*"There is a certain animal vitality in most of us which carries us through any trouble but the absolutely overwhelming. Only a fool has no sorrow, only an idiot has no grief - but then only a fool and an idiot will let grief and sorrow ride him down into the grave. So, I've been lucky, as most people are lucky; the animal in each of us has a lot more sense than our brains."*

### Addendum to License Agreement

This Addendum to License Agreement (the “Addendum”) is executed as of the \_\_\_ day of March, 2022, by and among The City of Morgantown, West Virginia, a political subdivision and municipal corporation of the State of West Virginia (“City”); Morgantown Board of Parks and Recreation Commissioners, a board established by City pursuant to West Virginia Code Chapter 8, Article 21, Section 1 *et seq.* (“BOPARC”); and Morgantown Utility Board, a board established by City pursuant to West Virginia Code Chapter 8, Article 20, Section 18 and Chapter 8, Article 16, Section 1 *set seq.* (“MUB”), all of whom collectively may be referred to as the “Parties,” upon the following terms and conditions:

1. This Addendum modifies that certain License Agreement executed among the Parties on or about November 1, 2019 (the “License”) providing for, among other things, installation of a water pipeline in White Park by MUB, construction of a trail in White Park as designed by a trail design professional retained by City and at the cost of MUB and replanting of trees and other site remediation related to pipeline installation. Modifications in this Addendum are based upon observed or changed site conditions occurring after execution of the License. The License is modified only as specifically stated in this Addendum.
2. Section 3.1. is modified as follows: Installation of the pipeline resulted in removal of 230 trees, with 163 of those trees exceeding 6” DBH, as determined by the ISA certified arborist retained for City, obligating Licensee to replace 326 trees. In lieu of replanting the 326 trees to be replaced due to pipeline construction, Licensee shall pay to City the total cost of the acquisition of 326 Replacement Trees (as defined in the License), including the cost of planting such trees, which the City will procure from a third-party vendor in accordance with the competitive bidding process under applicable law. Payment shall be due within 30 days of delivery of an invoice by the City. City will work with MUB to develop notices to bidders, requests for proposals and/or such other procurement documents needed to provide for the acquisition of the Replacement Trees.
3. Section 3.n. is modified as follows: Licensee shall provide for the construction and installation of a recreation trail for public access in accordance with the design and specifications developed by Appalachian Dirt, the Trail Designer selected for the project. The design on **Attachment A** depicts the approximate location of the trail to be constructed, which will include the bridge and adjoining structures described in the design, as they may be further specified in the notice to bidders. The parties will jointly approve the bridge design, approval not to be unreasonably withheld. City will act as fiscal agent for construction of the trail including the bridge, and City will work with MUB and BOPARC to develop notices to bidders, requests for proposals, and/or such other procurement documents needed to provide for construction of the trail. MUB may have a project representative on site during performance of the work at its cost to report to MUB as to the progress of the project. MUB will be responsible to pay when due the costs incurred in construction and installation of the trail. The Parties anticipate that construction will begin in the Summer of 2022.

Executed by:

The City of Morgantown

  
By: ~~▲. Kim Haws~~  
Its: City Manager

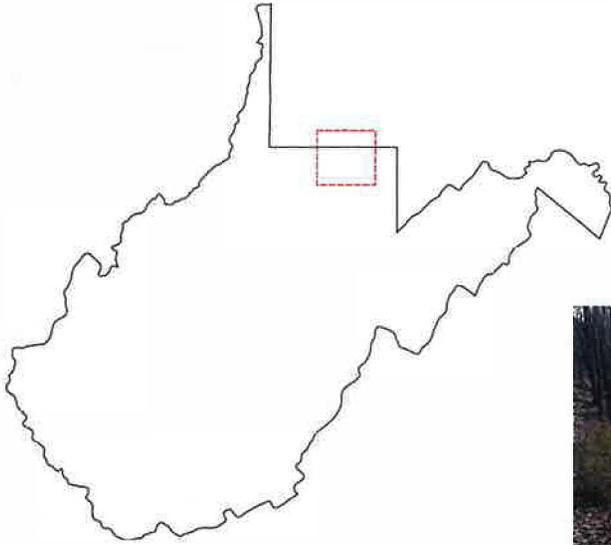
Morgantown Board of Parks and Recreation  
Commissioners

  
By: Melissa Wiles  
Its: Executive Director

Morgantown Utility Board

  
By: Michael McNulty  
Its: General Manager

# White Park Remediation Trail Project: Site Plan



Sheet Index	
Sheet #	Sheet Name
1	Cover Sheet
2	Site Map
3	Super Elevated Treadway_Typical
4	Full Bench Treadway_Typical
5	Turns_Typical
6	Rock Armoring_Typical
7	Earthen Berm Puncheon_Detail
8	Natural Stone Stairway_Detail
9	General Notes

Supporting Documentation:

Appendix A - STANDARD SPECIFICATIONS FOR CONSTRUCTION OF TRAILS AND TRAIL BRIDGES ON FOREST SERVICE PROJECTS (For On-Site Technical Standards and Definitions of Industry Standards)

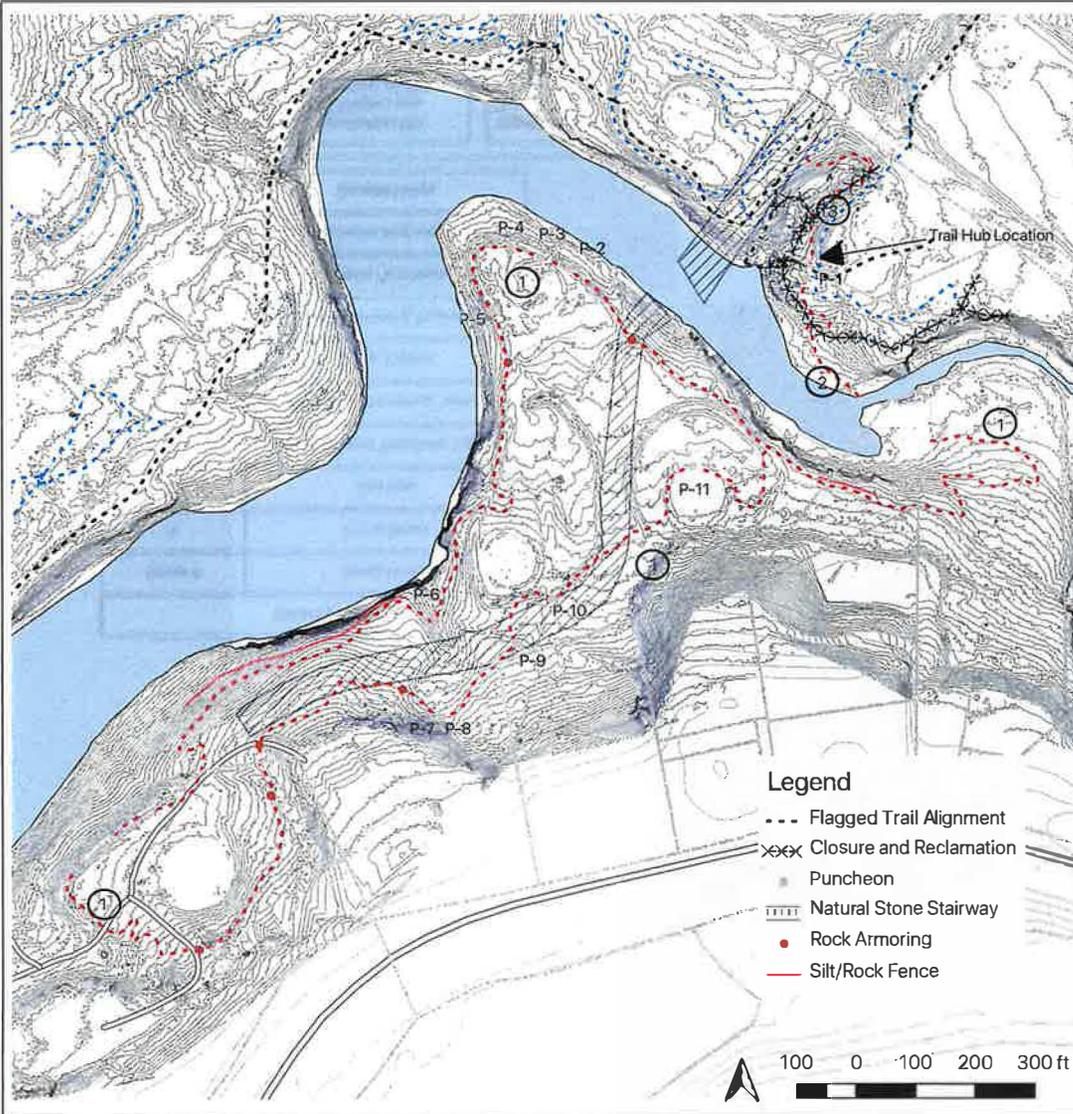


Appalachian Dirt  
22 Thistle Lane  
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(717)448-3228  
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Sheet Title: Cover Sheet  
Date: 9/19/20

Drawn By: ZDA  
Approved by: ZDA

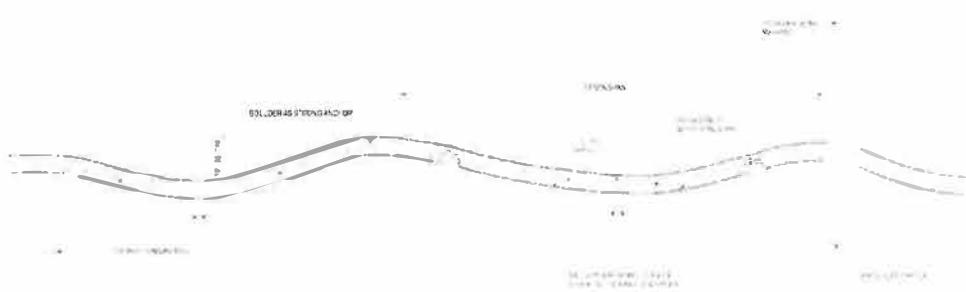
Client:  
City of Morgantown c/o Drew Gattlin  
389 Spruce Street  
Morgantown, WV 26505  
e- jgattlin@morgantownwv.gov



Estimated Units		Puncheon Index	
QTY	Item Description	Length (ft)	Segment ID
5,765	Class 3 Trail - 39"	12	P-1
710	Trail Closure and Reclamation	12	P-2
200	Puncheon (LF)	12	P-3
300	Rock Armoring (SQFT)	12	P-4
60	Natural Stone Stairway (LF)	12	P-5
5,765	Additional Alternative Item - All Weather Soil Amendment (LF)	12	P-6
		12	P-7
Segment Index			
Length	Segment ID	12	P-8
5,125	1	12	P-9
310	2	12	P-10
330	3	10	P-11

**General Narrative:**

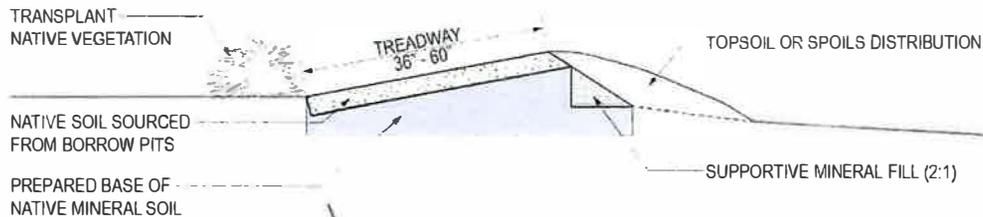
- Trail Segment 1 is located on the south side of Cobun Reservoir and ranges 5 -- 60% side slope. The most predominant features of the build site are unique earthen berms, historically used to contain oil tanks. These containment berms provide ample micro-topography to construct full bench trail. However, the density of these structures control trail alignment as the interior of the structures are almost without exception low-lying and wet. In addition, recent construction of a new waterline has left low quality soil of variable depth within the utility right-of-way. Some superelevated treadway, limited sections of natural stone retaining wall, indicated sections of rock armoring, and substantial quantities of puncheon bridge will be required. Treadway shall average 39" in width. Machine width should not exceed tread width.
- Trail Segments 2 and 3 are located on moderate side hill but are in a location with a substantially high density of existing trail. New trail construction, trail closure and reclamation, limited natural stone retaining wall, specified puncheon bridge, specified natural stone staircase, and a "trail hub" are required.
- Treadway soil may be amended with 3" course of ½" minus sized limestone aggregate (AKA fines or "Stone Dust") to provide an alternate bid item.
- A substantial span bridge and boardwalk section will be required to connect segments 2 and 1 by crossing Cobun Creek and surrounding low-lying, wet area. The bridge and boardwalk work should be completed concurrently with this trail construction project but are beyond the scope of these design documents due to specialized licensure and permitting requirements.
- Additionally, any needed kiosks, signage, and related trailhead infrastructure are not part of this bid packet.
- Alignments are flagged with black stripe on orange survey tape with orange pinflags for approximate centerline. Given terrain limitations, this is the anticipated build line. Variance up to 25 ft on either side of flagging is acceptable with prior approval.



Super-Elevated Treadway - Profile

N.T.S.

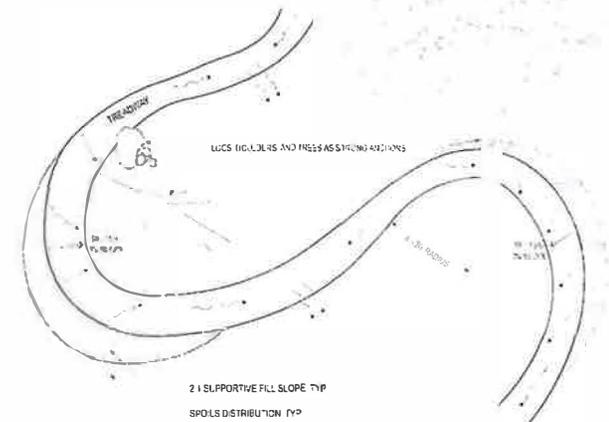
1



Super-Elevated Treadway - Cross Section

N.T.S.

3



Super-Elevated Treadway - Offset

N.T.S.

2

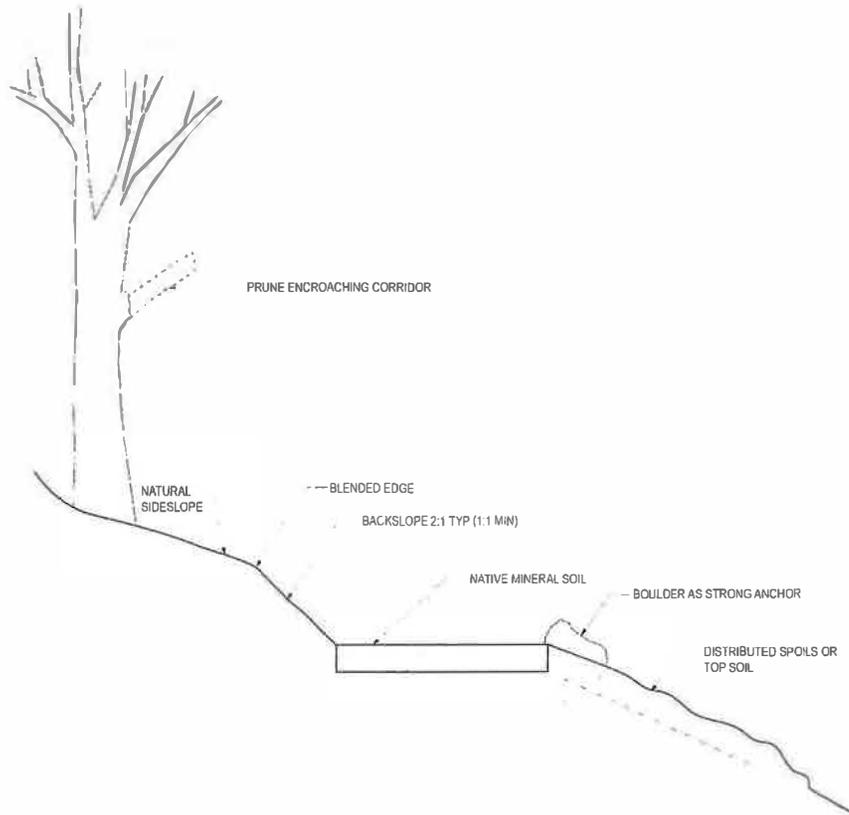
- Notes:
- Additional Alternative Item: Native mineral soils to be amended with 1/2" minus limestone aggregate. 3" course to be lightly mixed with native mineral soils.
  - Tread camber should support changes in directional travel to maintain user momentum and encourage a consistently flowing trail experience.
  - Simple rollers, bermed rollers (brollers), and bermed turns are acceptable super-elevated earthen structures
  - Mechanical compaction of treadway is required, compacted in maximum lifts of 6".



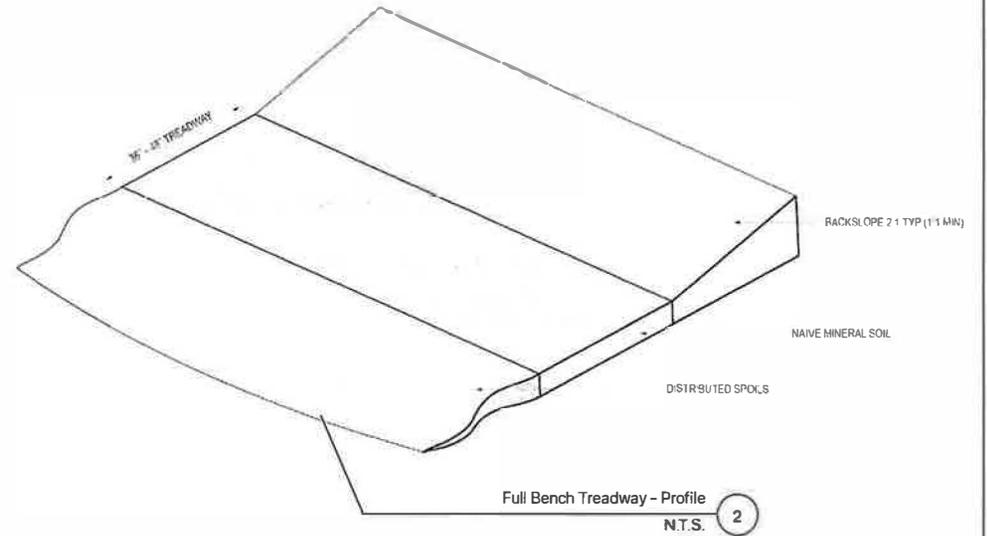
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Sheet Title: Super Elevated  
Treadway\_Typical  
Date: 9/30/20  
  
Drawn By: LHU  
Approved by: ZDA

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Full Bench Treadway - Cross Section  
N.T.S. 1



Full Bench Treadway - Profile  
N.T.S. 2

Notes:

- Add' Alternative Item: Native mineral soils to be amended with 1/2" minus limestone aggregate. 3" course to be lightly mixed with native mineral soils.
- Tread camber should support changes in directional travel to maintain user momentum and encourage a consistently flowing trail experience.
- Simple rollers, bermed rollers (brollers), and bermed turns are acceptable constructed features within full bench treadway
- Mechanical compaction of treadway is required, compacted in maximum lifts of 6".

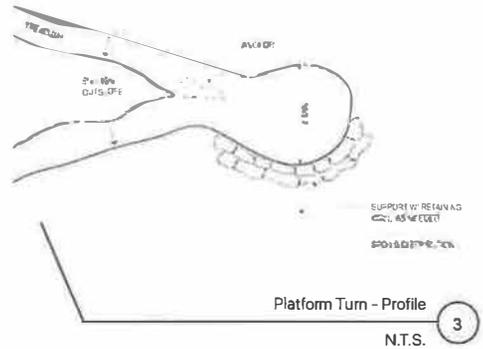
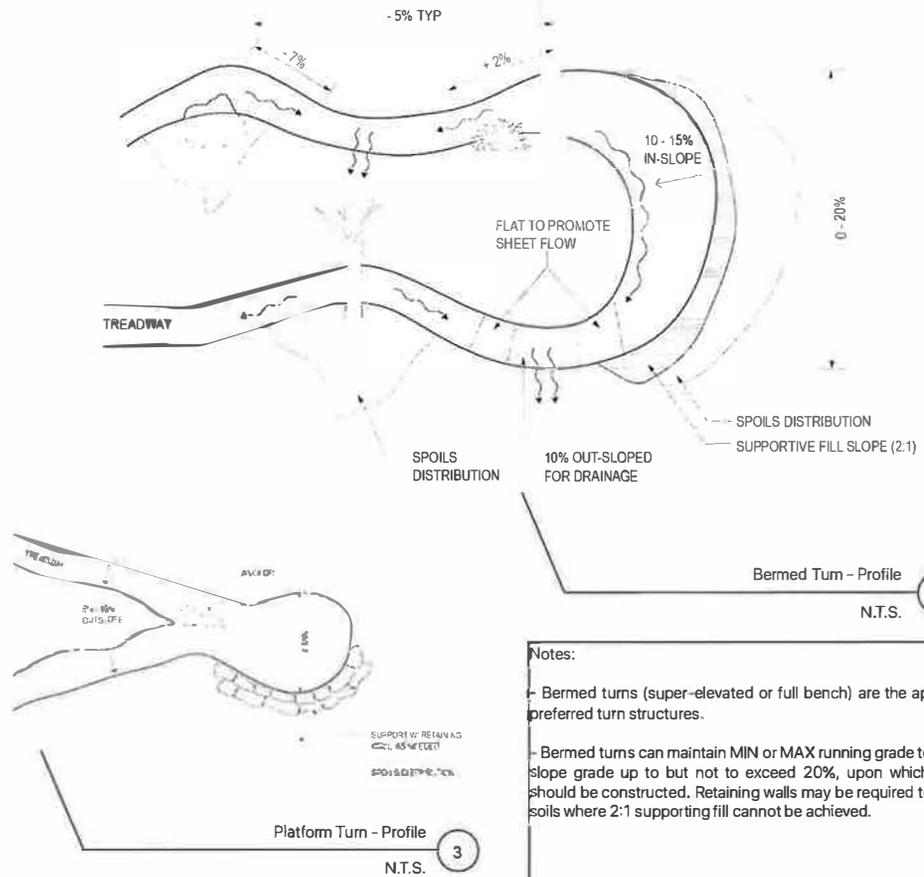
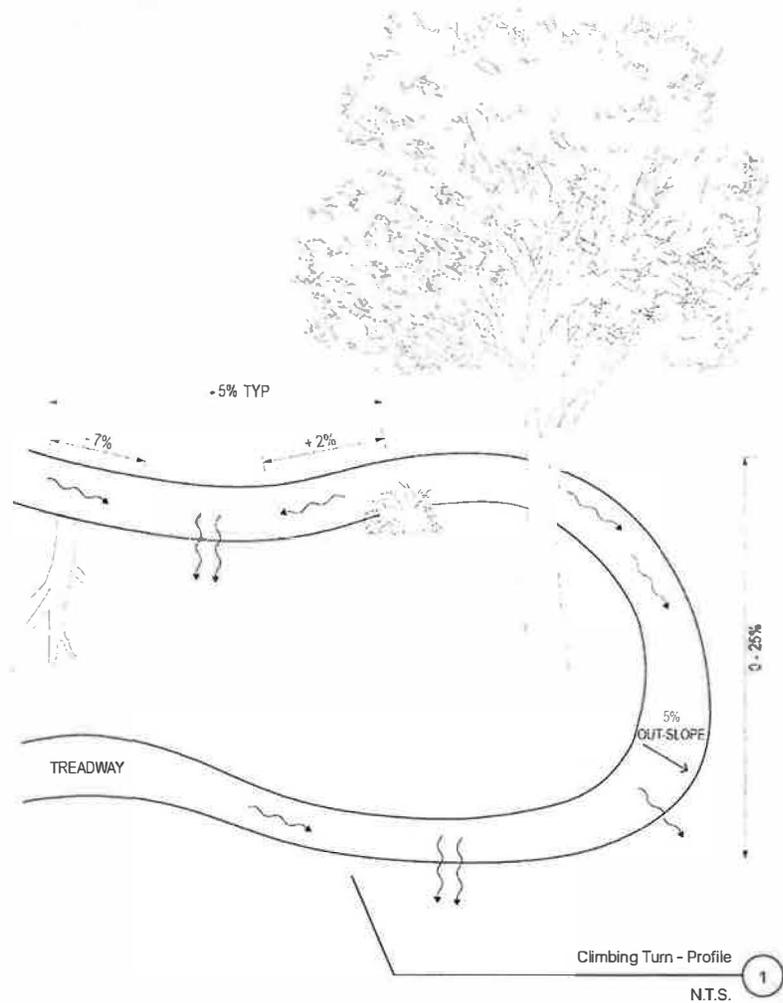
**APPALACHIAN**  
trails and services dirt

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Sheet Title: Full Bench\_Detail  
Date: 9/30/20  
Drawn By: LHU  
Approved by: ZDA



Client:  
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Notes:

- Bermed turns (super-elevated or full bench) are the approved and preferred turn structures.
- Bermed turns can maintain MIN or MAX running grade to match side slope grade up to but not to exceed 20%, upon which a platform should be constructed. Retaining walls may be required to support fill soils where 2:1 supporting fill cannot be achieved.

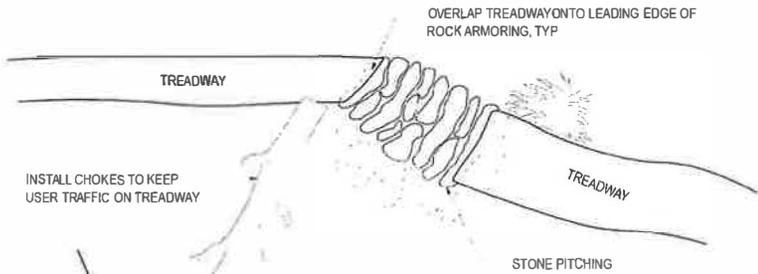
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**dirt**

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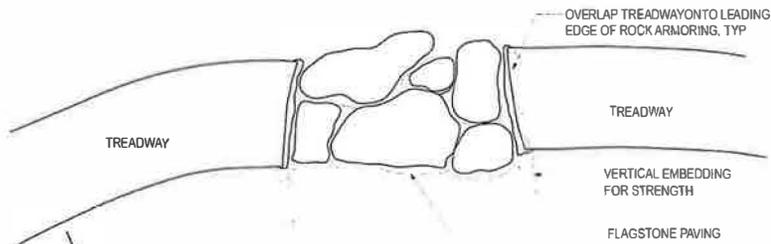
Sheet Title: Turns\_Typical  
Date: 9/30/20  
Drawn By: LHU  
Approved by: ZDA



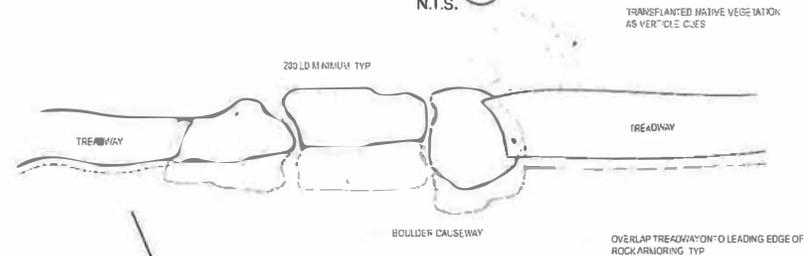
Client:  
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e- jgatlin@morgantownwv.gov



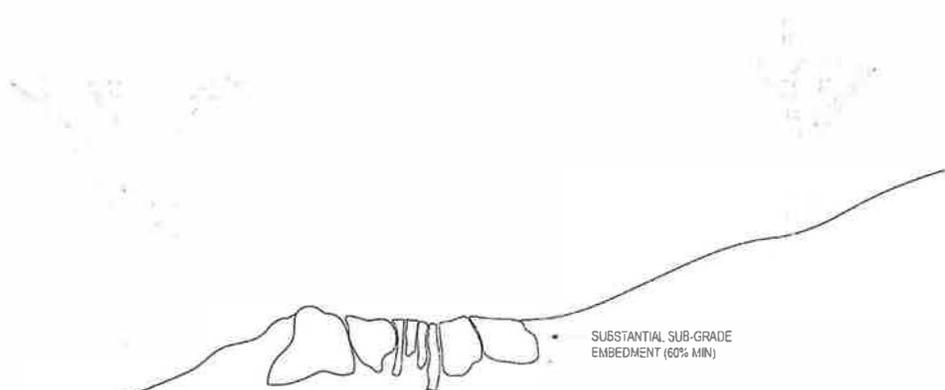
Stone Pitching - Profile  
1  
N.T.S.



Flagstone Paving - Profile  
2  
N.T.S.



Boulder Causeway - Profile  
3  
N.T.S.

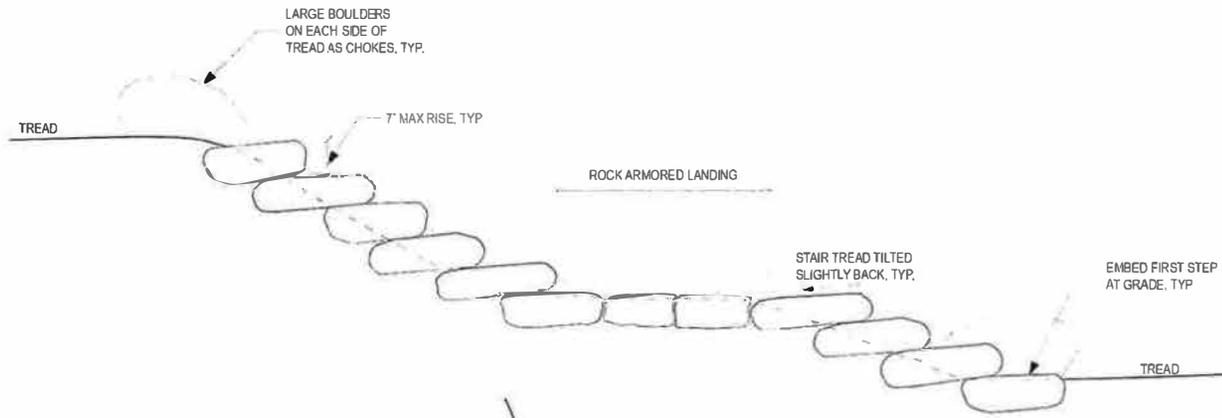


Rock Armoring - Cross Section  
4  
N.T.S.

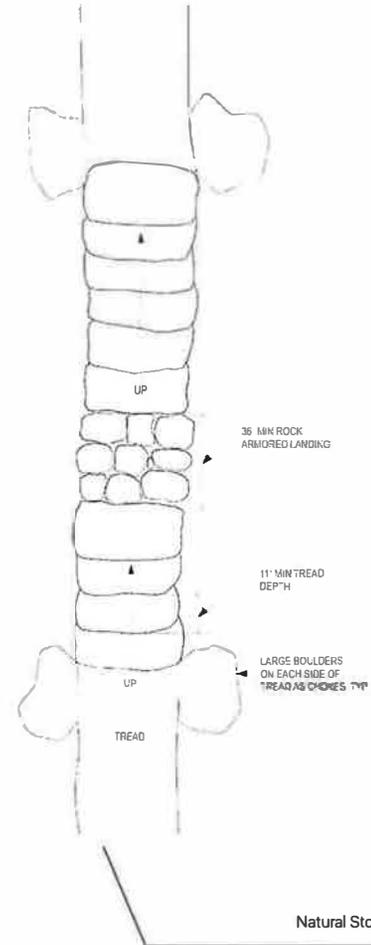
**Notes:**

- Rock armoring techniques should be selected to match native rock size
- "Chinking" between individual rocks hardens, tightens, and combines individual rocks into a cohesive unit.
- Installed rocks should not move under force.

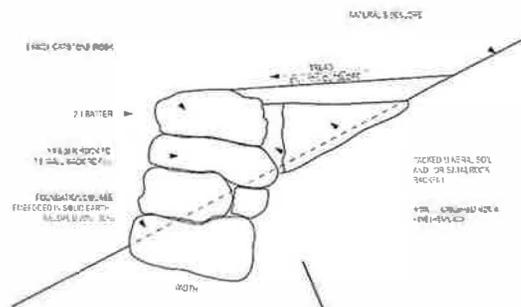




Natural Stone Stairway- Section  
N.T.S. ①



Natural Stone Stairway- Plan  
N.T.S. ②



Natural Stone Retaining Wall- Detail  
N.T.S. ③

Notes:

- Stone slab stairway should be constructed with substantial single slabs and framed with boulder chokes and rubble on alternate, opposing sides.
- Stairway should rise in 7" AVG lifts (minor variance of natural stone slabs acceptable) and rock armored landings placed as needed to accommodate run.
- Construct rock armored landing at transition into bridge.
- Natural shapes and aesthetics should be incorporated into natural stone stairway.



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Drawn By: LHU  
Approved by: ZDA

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389 Spruce Street  
Morgantown, WV 26505  
e- jgatlin@morgantownwv.gov

**Typical Order of Construction**

- Trail Corridor Clearing** – Typical proper pruning protocol should be followed (cuts made outside the growth collar without substantial stub), substantial DBH limitations are typically defined on a per project basis but consider 6" DBH to be typical removal limitations within tread corridor, habitat trees should not be removed without prior consent of client (consult project specific habitat concerns), and direct hazard trees within the trail corridor should be evaluated and removed if it can be done in a safe manner. Slashings should be swamped to a minimum distance of 15ft from trail tread (out of obvious sight lines is best), cut ends facing away, and piled no higher than 36 inches. Substantial diameter (>6" dbh) logs can be used for traffic control measures (ie chokes and corrals) and partially decayed woody debris can be utilized in re-naturalization if lain in natural patterns. Leaf litter, if present, should be collected uphill of trail corridor for future use in mulching spoils.
- Initial Excavation**- Initial excavation cut should be to remove trail tread of organic material in preparation of bench cut and/or cut and fill. Vegetation and detritus layer should be substantially separated from mineral base and staged for future distribution and/or reclamation. Operation also occurs in conjunction with removal and staging of naturally occurring stone and boulder materials for future use (ie. as tread, structure, reclamation, or traffic control measures).
- Tread Excavation**– Prepare mineral base for trail tread in line with specific project specifications. If on side hill >25%, use full bench construction of trail tread. If on side hill <25%, cut and fill of mineral materials will likely be necessary. Borrow sites for mineral material can typically be made below drain locations, within typical areas of disturbance. All fill dirt should be constructed in lifts of no greater than 6" thickness and fully compacted between lifts. Local borrow sites should be reclaimed fully to a natural shape, in a way that will not compact over time into a "pit" or "trench" shape. Borrow site refilling should also be done in lifts, as to achieve substantial compaction of fill materials. In substantially low and/or wet sites, borrow cuts may be filled with sorted stone and rubble to achieve french drain and sump style structures. Trail tread must achieve positive drainage and manage water in a sustainable manner. Substantial cut slopes may need retaining wall structures. Install as needed.
- Tread and Corridor Finishing**– Typical finish work activities include (but may not be limited to) tread raking and shaping to remove non permanent elements (replacing divots after even compaction) and ensure positive drainage, lopping of all substantial diameter roots (>3/8") protruding from ground level within the disturbance zone (special care given to trail tread and back-slope), cut slope stabilization (ie, backslope and supporting slopes of constructed features) of typical 2:1 ratio, retaining wall structures not built in concurrence with tread excavation, installation of rock armoring and finish rock work as needed, and the installation of traffic control structures as needed (ie chokes, corrals, and vertical cues).
- Reclamation** – Best management practices include the transplant of low and/or vertical vegetation, substantial woody debris, and placement of rock (natural side up if possible) to aid in restoration of a "natural setting".
- Compaction and Mulching** – As per sediment and erosion best management practices, daily tread compaction (appropriate mechanical compaction) is necessary and mulching with leaf litter or approved materials ensures optimum sediment and erosion prevention protocol. When mulching with naturally occurring leaf litter, do not strip adjacent parcels of forest floor bare of leaf litter. Appropriate quantities of leaf litter for mulching should be obtained from trail corridor during corridor clearing phase as noted above.



Trail Type	Trail Class 1	Trail Class 2	Trail Class 3	Trail Class 4
Ability Rating	Advanced	Intermediate/Advanced	Beginner/Intermediate	Beginner
Difficulty Symbol	Black/Double Black Diamond	Black Diamond/Blue Square	Blue Square/Green Circle	Green Circle
Typical Tread Surface	Native Soils, Lightly Graded/Graded or Ungraded	Native Soils, Lightly Graded/Graded	Native Soils/Amenated Soils, Graded	Native Soils/Amenated Soils, Graded
Treadway Width - AVG	6-24"	12-36" (12")	>36"(18")	>48"(32")
Structure Width - MIN	18"	18"	36"	48"
Running Grade - AVG (100 MAX)	5-20% (30%)	5-12% (20%)	3-7% (12%)	3-5% (10%)
Turn Radius - MIN	--	8'	10'	16'
Turn Running Grade - MAX	--	25.00%	20.00%	5.00%
Unavoidable Obstacle - Continuum (MAX)	<24" (24")	6" (12")	<3" (10")	<3"(6")
Technical Trail Features (Avoidable Obstacles) - MAX	>36"	36"	24"	12"
Rugosity (Trail Texture)	High	Medium-High	Low-Medium	Low

**Sediment and Erosion Control Best Management Practices**

- Mechanical Tread Compaction** – Daily upkeep of mechanical tread compaction with as-built distances.
- Spoils Mulching** – Daily upkeep with mulching of distributed spoils material, upkeep with as-built distances, using local leaf litter. If local leaf litter is not present, substitutions can be made with weed-free straw, wood chips, or in some cases the re-vegetation of sod strips.
- Filter Strip** – Areas of naturally vegetated ground cover bordering the disturbance area that allow for the decrease in velocity of water flow and natural permeation into the ground should be present along the duration of the trail corridor. Appropriate implementation of construction spoils (natural forest detritus) can be considered part of this strip if substantially devoid of mineral particulate. If trail corridor is void of substantial filter strip, formal S&E structure implementation may be required.
- Straw Wattle** – For typical, formal S&E control measures, straw wattle (Filter Logs, Straw Logs, etc) can be implemented to slow water flow, deposit any carried sediment, and allow permeation before exiting disturbance areas. Log staking should be done in such a way as to decrease fall risk to trail users (angled away from trail corridor).



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Sheet Title: General Notes  
Date: 9/30/20

Drawn By: ZDA  
Approved by: ZDA

Client:  
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e-jgatlin@morgantownwv.gov



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west virginia department of environmental protection

---

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

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

January 11, 2022

Ms. Jessica McDonald  
West Virginia Land Stewardship Corporation  
430 Spruce Street, Suite 201  
Morgantown, WV 26505

RE: Written Determination  
Petroleum Property Eligibility for Brownfields Grant Funding  
White Park, Morgantown, Monongalia County

Dear Ms. McDonald:

A review of available information regarding the subject petroleum property by the Office of Environmental Remediation (OER) has been completed. Based on our review, the OER has determined that the subject petroleum property is eligible for brownfields grant funding. In providing this written eligibility determination, the OER has applied state and federal guidelines.

Should you have any questions, I can be contacted by phone at 304-893-4285 or email at Erin.R.Brittain@wv.gov.

Sincerely,

A handwritten signature in blue ink that reads "Erin R. Brittain". The signature is written in a cursive style.

Erin R. Brittain, CHMM  
Brownfields Program Manager

## Downstream Strategies

---

911 Greenbag Road  
Morgantown, WV 26508  
[www.downstreamstrategies.com](http://www.downstreamstrategies.com)

# DRAFT Analysis of Brownfield Cleanup Alternatives

White Park Southside Cleanup  
1001 Mississippi Street  
Monongalia County  
Morgantown, West Virginia

*Prepared for:*  
City of Morgantown  
389 Spruce Street  
Morgantown, WV 26505

November 2, 2022



---

Marc Glass, WV LRS #175  
Principal

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## 1. INTRODUCTION

The City of Morgantown (hereafter ‘the City’ or ‘Morgantown’), with assistance from Downstream Strategies, LLC (DS), presents here an Analysis of Brownfield Cleanup Alternatives (ABCA) for the White Park Southside Cleanup Project (Site) in support of a US EPA Brownfield Cleanup Grant application. The ABCA:

- Describes the historical and planned future use of the Site;
- Reviews previous environmental investigations and their findings;
- Identifies and evaluates feasible cleanup alternatives; and
- Recommends a cleanup alternative that directly integrates with site redevelopment objectives.

### 1.1 Project Goal

Recent Site Assessment identified heavy metals and PAHs in Site soils above state risk-based standards. The proposed cleanup will include construction of a new trail subsystem and closure of existing, unauthorized trail. We propose an integrated process that weds remedy and reuse with goals to:

- Minimize negative ecological impacts of any cleanup to the Site’s mature forest canopy;
- Help the City address aligned community objectives and goals, such as making trails more accessible, sustainable, and useable for both transportation and recreation; and
- Leverage diverse funding sources and innovative methods to more fully complete remediation projects during cleanup phases.

### 1.2 Site Location and Description

The City’s 170-acre White Park (Figure 1) sits in between several residential neighborhoods, two commercial corridors, and a large county school campus in the southern portion of Morgantown, Monongalia County, West Virginia. The Site (Figure 2) encompasses nearly 21-acres of mostly underutilized and poorly accessible park lands, including portions of and extending across four City-owned parcels listed below in Table 1.

**Table 1: White Park Southside Cleanup Parcels**

Parcel ID	Total Acres	Owner
31-09-048A-0006-0000	40.74	City of Morgantown
31-09-048A-0007-0000	7.118	City of Morgantown
31-09-0048-0041-0000	33.51	City of Morgantown
31-09-048A-0001-0000	3.051	City of Morgantown

The Site forms part of White Park’s southern boundary. The City’s secondary drinking water reservoir forms most of the Site’s northern border and is within park boundaries. The remainder of White Park and a small portion of the Site, both north of the reservoir, are lightly developed by a recreational trail network that winds through mature forested lands. Other park developments include several ballfields, an ice rink, picnic pavilions, public restrooms, and other typical park amenities.

A commercial plaza sits between the Site’s southern boundary and Greenbag Road. Light commercial development also sits to the west, bordering Don Knotts Blvd. (Route 119). The municipal water treatment plant sits across Route 119, just downstream of the Site. South Middle School and Monongalia County Technical Education Center campuses are also located to the northeast, immediately adjacent to White Park.

No permanent, habitable structures exist on the Site. Several thousand feet of existing, unauthorized, social and/or wildlife trails pass on, around, and through poorly drained earthen berm features left behind by previous Site use. Outside a recently cleared and poorly compacted utility corridor that transects the site east to west, the site contains a mature forest canopy and typical eastern, hardwood forest silt loam between the berm clays and hardpan. A gravel dam access road and construction laydown area sit on the western side of the site. In general, the Site's terrain is mixed with side slopes ranging between 5%-60%.

### 1.3 Geology and Hydrogeology

The Site sits at an elevation of approximately 950 to 1,000 feet above mean sea level. The topography of the project area has a hilly and variable gradient, generally sloping north towards the Cobun Creek Reservoir. Regionally, the slope trends west towards the Monongahela River.

The Appalachian Plateaus physiographic province underlies all of Monongalia County, including the White Park Southside. Bedrock in the region is characteristically flat to gently folded shale, siltstone, and sandstone. Uppermost consolidated geology is composed of the Conemaugh Group of the Pennsylvania Series, which consists of non-marine cyclic sequences of red and grey shale, siltstone, and sandstone. Thin seams of limestone and coal are also present.

U.S. Department of Agriculture's (USDA's) Soil Conservation Service (SCS) mapping<sup>1</sup> indicates primary soils at the site consist of Clarksburg silt loams, with minor contributions of Culleoka-Westmorland silt loams, Lobdell silt loams, and Urban Land. Clarksburg silt loams are moderately well drained and are derived from fine-loamy colluvium from shale, sandstone, and limestone parent material. Urban land is largely introduced material.

Surface runoff at the site flows toward Cobun Creek and the Cobun Creek Reservoir to the north. Cobun Creek discharges into the Monongahela River approximately 0.25-miles to the west. Under natural, unconfined aquifer conditions, shallow groundwater is anticipated to flow towards the reservoir and Monongahela River.

The online National Wetlands Inventory<sup>2</sup> mapping indicates no wetlands located within the White Park Southside project area. The Cobun Creek Reservoir is designated as a 12.17-acre freshwater pond. Cobun Creek incoming from the east is classified as a riverine habitat.

### 1.4 Site History

The City acquired the Site in 1973 as part of a succession of transfers of real estate that eventually formed White Park. Immediately prior to the City's ownership, the Site, the rest of White Park lands, and several other surrounding properties sat largely vacant for decades after the decommissioning of Standard Oil's (succeeded by Eureka Pipeline, Pennzoil-Quaker State, and Royal Dutch Shell) 700-acre South Morgantown Tank Farm.

The Tank Farm began crude oil storage operations around 1890 and operated throughout the first half of the 20<sup>th</sup> century. Although largely abandoned by the late 1940s, a handful of aboveground storage tanks (ASTs) remained, at least two of which were on the Site, and may have been used for other purposes into the early 1970s. Aerial imagery and other records suggest the farm housed at least 70 ASTs at its operational height,

<sup>1</sup> <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>

<sup>2</sup> <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>

with a total capacity around 2 million barrels. Primary and secondary containment berms formed by large earthen dikes largely remain, suggesting at least 6 ASTs previously existed on the Site.

In 1958, the Morgantown Water Commission constructed a dam to form a drinking water reservoir immediately adjacent to the Site. A 1960 aerial shows only three tanks on the farm (two existing on the Site), with unknown uses and stewardship. In 2016, concerns with the reservoir's capacity to service the area's water needs prompted the Water Commission's successor, the Morgantown Utility Board (MUB) to begin constructing a new and much larger reservoir several miles upstream. In 2019, MUB placed a raw water line through the Site to connect the new reservoir, still currently under construction, to the municipal drinking water treatment plant just downstream of the Site near the confluence of Cobun Creek and the Monongahela River.

## 1.5 Site Uses

Today, White Park serves as major recreational hub for the City. It is the center for numerous activities including adult and youth ballfields, the Morgantown Ice Arena, picnic shelters, playground areas, and outdoor classroom areas for the adjacent middle school. A substantial natural-surfaced trail system developed informally over the past century, winding through, around, and on top the abandoned primary and secondary AST containment dikes. Before the City and its Board of Parks and Recreation Commissioners formalized White Park, this greenspace was essentially unmanaged. Curious hikers, motorcyclists, and early mountain bikers blazed a labyrinthian system from the natural wildlife and dog trails. Although popular, these trails now elicit as many complaints as they do praise due to their extreme density, poor drainage, high maintenance costs, and general lack of ability to supply desired and accessible experiences for the various user, volunteer, and manager groups. The system now serves cross-country teams, the adjacent middle school bicycle club, hikers, birders, and several other trail users.

Until recently, the Site has been a less visited portion of the park primarily due to limited options for access. Still, a loose network of poorly built, unsanctioned, casual trails demonstrates consistent, if occasional, visitation.

In recent years, community demand for recreation and alternate transportation routes spurred major planning efforts focusing on development and expansion of the City's existing trail network. Due its central location and proximity to neighborhoods, schools, and commercial districts, White Park is a central hub for a larger regional trail network that is being designed and built in phases and supported by the 2020 Morgantown Regional Bike and Pedestrian Transportation Plan.

In 2020 the City and West Virginia University (WVU) jointly contracted IMBA Trail Solutions to develop an Area-wide Master Trails Plan. The plan, completed during the spring of 2022 after an intensive phase of research, planning, and interactions with area stakeholder groups; provides a comprehensive blueprint for implementation of a trail network consisting of greenway corridors, alternate transportation routes, and "pocket parks" on both City and university owned lands inside city limits and extending into Monongalia County. Early in 2022, the plan was split into Zones for implementation according to each entity's resource prioritization. For the City, White Park is Zone 1. Development of the White Park Southside Trail will be the first phase of the City's trail redevelopment effort and will showcase an innovative and technically sound approach as a model for future successes.

## 2. PREVIOUS ENVIRONMENTAL INVESTIGATIONS

As a result of historical use as an AST farm, site assessment for White Park has occurred in sporadic phases beginning in the 1980s, including some investigation into tank sites on the Site. Assessments specific to the White Park Southside Cleanup project area began in 2019, although targeted cleanup activities have been performed at the Site beginning in 1988.

The following subsections present a summary of historical assessment findings and targeted cleanup actions provided in a May 2022 Phase II ESA for the White Park Southside Cleanup project area (Environmental Standards, 2022). The Phase II was performed utilizing funding provided by a U.S. EPA Brownfield Community-Wide Assessment grant Cooperative Agreement (BF-963692-01-0) awarded to the West Virginia Land Stewardship Corporation (WVLSC).

### 2.1 1980s through early 2000s

In August 1988, White Park, inclusive of the White Park Southside Cleanup project area, was listed as a potentially hazardous waste site in the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) as WVD988766168 resulting from an inspection and preliminary sampling investigation conducted by the West Virginia Department of Natural Resources, Waste Management Section (WVDNR WMS).

The inspection was initiated by a report from a private citizen concerning tar-like deposits observed in an area remaining from a former crude oil tank farm. During the inspection, a tar-like substance with a petroleum odor was observed in a former dike area near the South Middle School, and additional tar-like deposits were observed along a small tributary stream that flowed into the Cobun Creek Reservoir.

A Preliminary Assessment (PA) was performed in March 1989 by WVDNR WMS, and a CERCLA site investigation (SI) was recommended.

In April 1989, WVDNR WMS personnel inspected White Park. In 1998, the Eureka Pipeline Company completed reclamation work consisting of mixing lime with surface soils in three dike areas near the ball fields with exposed hydrocarbon residues. These were identified as tank locations 44, 68, and 74. One of these reclaimed dike areas sits at the northeastern corner of the Site.

In 2004, the WVDEP Office of Environmental Remediation (OER) determined further assessment was warranted to determine potential risk associated at White Park and if the site should undergo further investigation under CERCLA.

### 2.2 2009 Site Inspection Reassessment and Soil Cleanup

A SI was performed at White Park under a pre-remedial cooperative agreement between the WVDEP and the US EPA Region III in 2009. Field sampling activities included 13 surface soil, seven subsurface soil, two reservoir surface water, and two reservoir sediment samples. The samples were analyzed for Volatile Organic Compounds (VOCs); Semivolatile organic compound (SVOCs) of which Polycyclic Aromatic Hydrocarbons (PAHs) are a subset; Resource Conservation and Recovery Act (RCRA) 8 Metals; and polychlorinated biphenyls (PCBs). The investigation reported the following:

- Elevated concentrations of barium in the reservoir surface water
- Elevated levels of SVOCs in the reservoir sediments

- Arsenic, naphthalene, benzo(a)anthracene, benzo(b)fluoranthene, benzo(a)pyrene, indeno(1,2,3-cd)pyrene, methylene chloride, benzene, 1,2-dichloroethane, ethylbenzene, and 1,1,2,2-tetrachloroethane in soils at concentrations greater than their respective residential soil risk-based concentrations (RBCs).

The highest concentration of these contaminants occurred near free-product observed within the diked area of former tank number 40, which is within the Site and approximately 100-feet upgradient of the Cobun Creek Reservoir. The following conclusions were provided in the SI Report (Triad, 2010):

- Contamination to site soils from historical land use (tank farm) exists.
- Recreational visitors are being exposed to surface soil concentrations above residential soil RBCs.
- The risk of a release to Cobun Creek Reservoir via overland flow exists.

The following actions were recommended for consideration:

- Removal of the area of observed free product in the diked area of tank number 40
- If not already in place, groundwater and future land use be restricted through a land use covenant or deed restriction

Upon notification of the SI findings by WVDEP, in November 2010, Pennzoil-Quaker State removed approximately 1,300 cubic yards of soil from the diked area of former tank number 40 and transported the impacted soils off site after characterization as non-hazardous waste. Approximately 1,900 cubic yards of off-site backfill was imported from a virgin hillside/hill cut at the southern terminus of Distributor Drive (MUB office located on intersection of Greenbag Road and Distributor Drive) approximately 1-mile south the Site. Prior to import, the backfill was characterized by VOC analysis of two samples to demonstrate attainment of WVDEP residential soil RBCs.

### **2.3 2019 MUB Phase II ESA and Soil Removal**

During June 2019, a limited Phase II ESA (Triad, 2019a) was completed on behalf of MUB to assess subsurface soil contamination along the corridor of a proposed raw waterline. The waterline corridor transects the White Park Southside Cleanup project area from northeast to southwest.

A total of 43 subsurface soil samples were collected and analyzed for metals, VOCs, and SVOCs. Phase II findings indicated low level PAHs and metals present in the subsurface soil of the proposed waterline right-of-way.

As a result of the Phase II findings, MUB coordinated with the WVDEP and an environmental professional from Triad Engineering, Inc. (Triad) was retained to perform monitoring during excavation of the waterline right-of-way. A strong petroleum odor and soil staining were observed during excavation near the former tank number 40 location, presumably in or near the same location remediated by Pennzoil/Quaker State in 2010. Soils presumed contaminated based on photoionization detector field screening were over excavated and temporarily stored onsite. Triad noted that suspected petroleum contamination became less evident as excavation progressed northeast. A total of 10 samples were collected from the estimated 2,785-tons of stockpiled material and analyzed for potential leachability for disposal purposes. Excavated soils were disposed offsite at a local disposal facility in accordance with the approved Soil Management Plan (Triad, 2019b). Due to the analysis performed (TCLP extract), direct comparison to WV VRP De Minimis standards for residential soils was not applicable.

## 2.4 2020 Site Inspection Reassessment

In 2020, a site inspection reassessment (SIR) (Triad, 2020) was performed under a pre-remedial cooperative agreement between the WVDEP and the US EPA Region III. The SIR was performed to qualitatively assess potential risk and determine whether the entire White Park CERCLIS Site may be eligible for further investigation under CERCLA. Reassessment activities included collection of 11 surface soil, five subsurface soil, five surface water, eight sediment samples, and four soil vapor samples for analysis of VOCs, SVOCs, metals, and PCBs.

Elevated concentrations of metals were detected in surface water and sediment. Metals and PAH were detected in soils at concentrations greater than their respective residential soil RBCs. The highest contaminant concentrations were observed in samples collected in the diked areas of former tank numbers 30, 50, 60, 61, 62, and 74. (Figure 3)

Based on the reassessment activities, the recommendation was provided to enter the White Park site into the West Virginia Voluntary Remediation Program (VRP) to evaluate human health and ecological receptors and remedial options for the Site.

## 2.5 2022 Phase II ESA for White Park Southside Trail Property

Based on the history of White Park and findings of previous assessments, a limited Phase II ESA (Environmental Standards, 2022) was performed prior to construction of the proposed White Park Southside (WPS) trail. The assessment focused on the planned trail course, and not the entire property. Soil samples were collected to identify and characterize contaminants present within the White Park Southside Cleanup project area that would be a potential risk to recreational trail users of the Site.

A total of 65 surface soil samples were collected from the 0-2 feet below ground surface (bgs) at regular intervals along the proposed trail corridor. Four subsurface soil samples were collected from the 2-8 feet bgs, in areas of potential on-site borrow material to support construction of natural surfaced trail features. Soil samples were analyzed for RCRA 8 metals, PAHs, and VOCs.

Soil analytical results were compared to calculated recreational regional screening levels (RRSLs) derived using the US EPA regional screening level generator tool and exposure scenarios approved by WVDEP as inputs. Recreational exposure is typically less than residential so results that exceed the calculated recreational screening levels would typically also exceed WV De Minimis values for residential soil.

Laboratory analytical results indicated that the only metal exceeding its calculated RRSL was Arsenic in 13 of the 65 surface soil samples. There were multiple PAHs that exceeded their calculated RRSLs in surface soil across the Site. Arsenic was also the only metal exceeded the RRSL in subsurface soil. Subsurface soils demonstrated attainment of the RRSLs for PAHs and naphthalene.

The Phase II ESA recommendations included:

- Development of a soil management plan.
- Rerouting of the trail was not recommended without additional sampling.
- Entry of the site into the WV VRP.

Based on the current proposed trail path across the White Park Southside Cleanup project area, the Phase II also recommended a soil cover should be established in the areas of sample locations SS-23, SS-25, SS-29, SS-47, SS-48, and SS-50. The cover was recommended to be a one-foot layer of clean soil, although alternate

materials and cover thickness may be approved by WVDEP, to provide exposure pathway elimination for contaminants in soil.

## 2.6 2022 Voluntary Remediation Program

On October 5, 2022, the entire White Park site was accepted into the WV VRP with the City of Morgantown as the Applicant. For the White Park Southside Cleanup project, site assessment in the context of the VRP is nearly complete. The WVDEP has agreed that assessment of potential groundwater impacts may be accomplished through limited additional sampling to evaluate the leachability of contaminants in soil.

For the White Park Southside cleanup project, a site assessment work plan is currently being developed and supplemental site assessment activities are anticipated for completion by the first quarter of 2023. Historical and supplemental site assessment will provide the data necessary to perform risk assessment through the VRP and support final remedial decision making. Existing assessment data indicates that contaminants of concern (COCs) for the site are PAHs in surface soils and metals Arsenic in both surface and subsurface soils based on their respective concentrations above derived recreational use screening levels.

## 3. APPLICABLE REGULATIONS AND CLEANUP STANDARDS

The WVDEP provides the state's environmental oversight and has provided a specific letter of support for this project. WVDEP operates and regulates according to environmental laws adopted by the United States Congress and the West Virginia Legislature.

Authorized by the West Virginia Voluntary Remediation and Redevelopment Act (WV VRRRA), the WVDEP OER administers the WV Voluntary Remediation Program (VRP) and provides regulatory oversight for all brownfield cleanup projects. The program provides a Certificate of Completion to applicants who successfully demonstrate their site has met the state's most current risk-based human health and ecological standards, reviewed annually and published as the WVDEP VRP De Minimis Standards and Relevant Benchmarks within Interpretive Rule 60CSR9. Decisions on how to remedy a site through the VRP are based on risks the site may pose to human health and the environment. Remedies such as removal, treatment, and control of the contamination are used, alone or in concert, to address these risks. The VRP is protective of communities and the environment, while promoting economic development in West Virginia.

The cleanup effort will comply with applicable Federal, State and Local environmental regulations, which include but are not limited to the Federal Davis-Bacon Act, NPDES permitting, and Occupational Safety and Health Administration (OSHA) guidelines. At a minimum, a NPDES permit for stormwater management is anticipated. As appropriate, the United States Army Corps of Engineers (USACE) will be consulted to determine if wetland areas may be affected or if permits are required for work potentially impacting surface water bodies. All applicable regulations will be determined as part of the engineering phase of the project and adhered to accordingly. As with any West Virginia construction project disturbing an area greater than one-acre, the project will be subject to inspections by the WVDEP for stormwater management and erosion and sediment control best management practices.

Contractors must be licensed in the State of West Virginia and must also abide by all federal, state, and local laws. As applicable, contractors will be required to obtain a building permit from the City of Morgantown Code Enforcement Office.

### 3.1 Climate Change Considerations

The US EPA has directed Cleanup Grant recipients to evaluate the resilience of the remedial options considering reasonably foreseeable changing climate conditions (e.g., sea level rise, increased frequency and intensity of flooding and/or extreme weather events).

Current climate models for the Mid-Atlantic region and specifically northcentral West Virginia predict continued warming coupled with an increase frequency and intensity of extreme precipitation events. An increase in precipitation abundance is predicted overall, but shifting patterns will stress water availability for human and ecological consumers. These conditions likewise stress local government's ability to provide a sufficient quantity and quality of drinking water. The White Park Southside Cleanup project centers around utilizing constructed recreational trail beds to provide an effected barrier from identified contaminants while maximizing preservation of the existing vegetation surrounding the Cobun Creek Reservoir. Where applicable, portions of the trail bed cover will be weather hardened by armoring with materials salvaged from on-site and reclaimed from City construction projects. The City has reserved a stockpile of bricks, once produced in abundance locally, recovered from repaving projects specifically for this purpose. This approach, under the oversight of the VRP, ensures protectiveness while mitigating the stresses – increased rates of erosion and supply variations- that climate change places on drinking water reservoirs.

### 3.2 Aligning Remedy with Reuse

The City and BOPARC strive to enhance White Park for the use and enjoyment of its residents and as a showcase to visitors of the region as a natural, recreational, and economic asset.

Following the principles of US EPA's Superfund Redevelopment Initiative (SRI) to align cleanups with planned future uses, the White Park Southside The cleanup project is designed to support recreational and ecological uses. The cleanup design centers around the development of a recreational trail system that meets the demonstrated needs of the community and user groups, while ensuring protection of human and ecological receptors through the state's VRP. The White Park Southside trail will maximize user access throughout the available acreage and specific points of interest desired by users, such as scenic viewpoints, fishing access, and wildlife viewing opportunities.

## 4. ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES

Currently the Site represents a significantly less visited portion of the City's highly popular White Park. Over time and accentuated by the Covid-19 pandemic, a network of unsanctioned casual and social trails developed under the pressure of increased park visitation. For several years, the City has planned redevelopment to bring the Site up to date with expanded recreational access as a responsibly managed recreational trail system. During 2019, a high-volume subsurface raw water supply line was installed through the White Park Southside parcels, connecting the newly constructed Flegal Dam reservoir to the City's drinking water treatment and distribution plant.

### 4.1 Chemicals of Potential Concern

Construction-related and subsequent environmental site assessments have identified the presence of contaminants in site soils above health-based recreational screening levels. The chemicals of concern (COCs) for the Site soils are metals, specifically Arsenic, and several PAHs. Mitigation of risk from potential exposure to heavy metals and PAHs in surface soil at the site is necessary to support current and planned future uses for the Site.

## 4.2 Cleanup Alternatives Considered

The City and BOPARC plan to redevelop the White Park Southside as a responsibly managed recreational trail system spanning an approximately 21-acre area of White Park along the south side of the Cobun Creek Reservoir. The following remedial alternatives have been considered for this planned future use with respect to effectiveness, long-term reliability, implementability, and the general cost implications. A comparison of these attributes relative to each considered option is provided as Table 2 and a comparison of costs is provided as comparison Table 3.

### 4.2.1 *Alternative 1: No Action*

We find the No Action alternative unacceptable because it fails to address unacceptable recreator and ecological exposure to site contaminants. Deficiencies in the park's trail system have proven irresistible to the local community, who repeatedly conduct light grading of existing trail and construction of new earthen features whether or not authorized by the land manager. The growing interest in outdoor recreation and the rapidly maturing skill of local riders due to organized youth education and trail sports places further demands on a systematic restructuring of White Park's offerings.

### 4.2.2 *Alternative 2: Removal of All Contaminants*

Removing all contamination from the White Park Southside Site would continue to set an unfortunate precedent for future cleanup that favors an extreme impact to ecology, society, and budget. All but one of the previous tank farm cleanup efforts have taken this approach, and all have come with unsustainably high costs of cleanup that result in scarred lands requiring subsequently extensive (and expensive) restoration.

Late succession forests, extreme topography, and otherwise difficult site access would drastically expand negative impacts of cleanup of the small but dispersed tank areas. Removal of contaminants would require construction of several access roads to facilitate excavation of soil across the entire site for off-site disposal and the trucking in of clean fill. Even the installation of traditional stormwater controls (such as silt fences and retention ponds) for this type of cleanup would have higher impacts than the totality of our preferred alternative.

### 4.2.3 *Alternative 3: Pathway Elimination Through Traditional Cap/Cover Under VRP Oversight*

Alternative 3 considers a traditional presumptive remedy emerging from the human and ecological health risk assessment. Exposure pathways to site contaminants would be initially eliminated through targeted soil cover or capping of known AOCs with imported and/or relocated local clean fill materials. This cleanup approach can lead to effective risk reduction, but its long-term reliability depends heavily on institutional control (Land Use Covenant) and prescribed periodic inspection and maintenance for the engineering control (Cap/Cover). We see several shortcomings of this approach without any direct integration of those covers or caps into the desired redevelopment activities.

First, due to site characteristics and access constraints discussed above in **Alternative 2: Removal of All Contaminants**, a more traditional and targeted cap/cover approach would bring similar negative impacts. It would continue to set precedent for cleanup performed in isolation and resulting in a site that requires further extensive and expensive restoration. Although the requirement for and high costs of off-site disposal might be mitigated by consolidating contaminated soils on-site to a centralized location or locations where capping could be performed, doing so separately from trail construction would still require heavier excavation techniques and equipment. This heavier footprint would undoubtedly be associated with higher ecological impacts to the forest canopy and nearby water reservoir. The approach is also moderately difficult

to implement utilizing established construction practices and technical guidance provided by the VRP (See VRP Guidance Manual Appendix F – Cover and Cap Guidance).

Second, whether a single large or several smaller capped sites are chosen, without direct integration, this approach might inadvertently limit planned future use. As previously discussed, both the land manager and park users expect the Site to be opened to more active use as soon as possible. Trail construction is unlike roadway construction in that, due to its primary use of on-site materials, the construction process inherently responds to site characteristics daily. The constructed tread winds through a general flagged centerline corridor, sometimes deviating 20'+ from that flagged corridor. Even with careful sampling and planning of the traditional cap/cover, if these areas are off-limits to trail builders, any resulting trail system development would be severely hampered.

In general, when performed utilizing traditional methods, the process of capping does not align with the planned future use for trail development and the objective of providing user-friendly access to park amenities. Therefore, this alternative carries a high cost where it fails to make the most efficient use of limited space and resources to support those uses.

#### **4.2.4 *Alternative 4: Pathway Elimination through Capping Integrated into Trail Design under VRP Oversight***

Alternative 4 is to perform human and ecological health risk assessment, under the oversight of WVDEP through the VRP, with a presumptive remedy to provide exposure pathway elimination to site contaminants through soil cover or capping. However, in contrast to Alternative 3, Alternative 4 will specifically combine the design objectives for the planned future use (recreational trail development, enhance amenity access) into the remedial design.

Since it will utilize the same remedial approach as that proven in Alternative 3, Alternative 4 would also achieve the cleanup effectiveness and long-term reliability criteria. However, by performing cap installation as an integral part during trail construction, Alternative 4 would be substantially easier to implement and lower cost due to several important advantages.

Alternative 4 would require very little to no large tree removal as indicated by Alternatives 2 and 3. As part of the design, Alternative 4 will properly abandon and restore over 1750 linear feet of unauthorized “trails of convenience” that have developed passively by wildlife and users as means to access scenic areas, fishing spots, etc. This includes intentionally excavated unauthorized trails observed during design reconnaissance, presumably created to satisfy the need of advanced skill trail user groups (mountain bikers). Mitigating such future excavation, and the resulting direct contact to contaminants in subsurface soil, is a requirement of the remedial design best accomplished by meeting the need through proper trail design and management.

Alternative 4 would also take advantage of utilizing the linear trail corridor for access during cap construction. Materials for both trail and protective capping would be moved along the trail corridor utilizing smaller, light duty equipment typically utilized by professional trail contractors, and create substantially less ecological disturbance and surface impact. Site restoration would occur practically simultaneously with remedy construction. Alternative 4 also provides a substantial cost benefit of maximizing use of available space. Under Alternative 4, trail construction will be performed according to best design principles by an experienced contracted professional trail designer recognized by recognized professional organizations such as the Professional Trail Builders Association (PTBA) or International Mountain Biking Association (IMBA). Together, the contracted environmental professional licensed by the WV VRP - a Licensed Remediation

Specialist (LRS), and the contracted professional trail designer will finalize a design that will be approved by the WV VRP to ensure both user adoption and protectiveness.

To leverage common design elements for the remedial and trail design, signage and other educational tools will identify and demarcate the remedy. Design professionals from the Brad and Alys Smith Outdoor and Economic Development Collaborative and the North Brownfield Assistance Center at West Virginia University will assist with design of accessible signage to educate and inform the public. Traditional wayfinding and placemaking signage at trail heads, junctions, and along the trail course will also help explain the remedy to the public, communicate its effectiveness at protecting human health, and celebrate the vibrant site history. This will provide an important means of communication to the community, burdened by environmental uncertainty associated with the well-known and publicized park history as a tank field. Signage resources will also provide opportunity to communicate the importance of protecting and managing safe sources of drinking water in the adjacent Cobun Creek Reservoir. The signage program will help the public to become familiar with the remedial approach most likely to be used for other nearby areas planned for trail construction in the near future.

### **4.3 Recommended Cleanup Alternative**

As demonstrated by this ABCA, the preferred and recommended remedial alternative is Alternative 4: Pathway Elimination through Capping Integrated into Trail Design under VRP Oversight. This option is evaluated as the most favorable since it does not limit, but actually forwards planned future uses of the White Park Southside and is protective of both human and ecological receptors.

DRAFT

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Figure 1: Site Location Map



Figure 2: Site Map

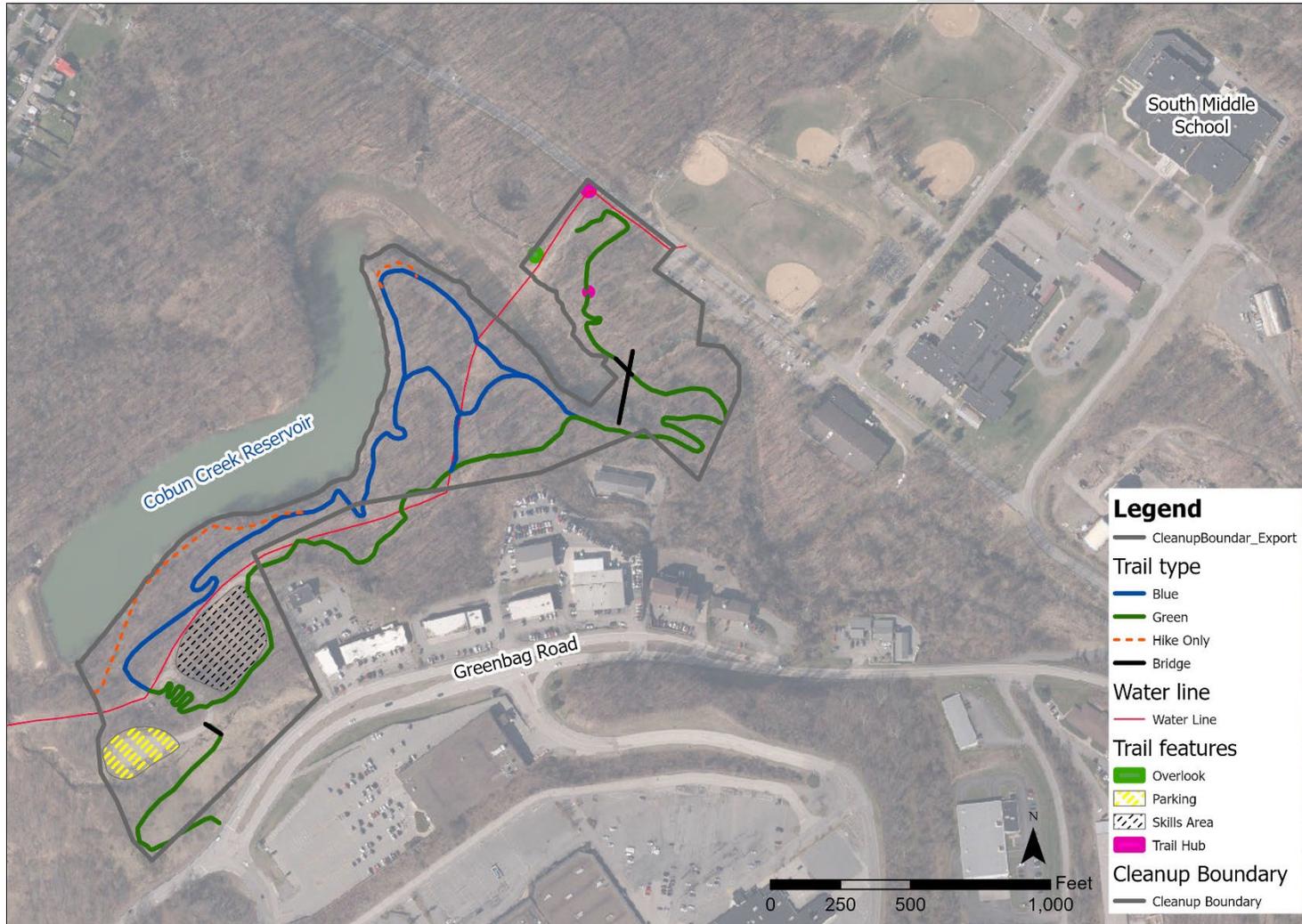
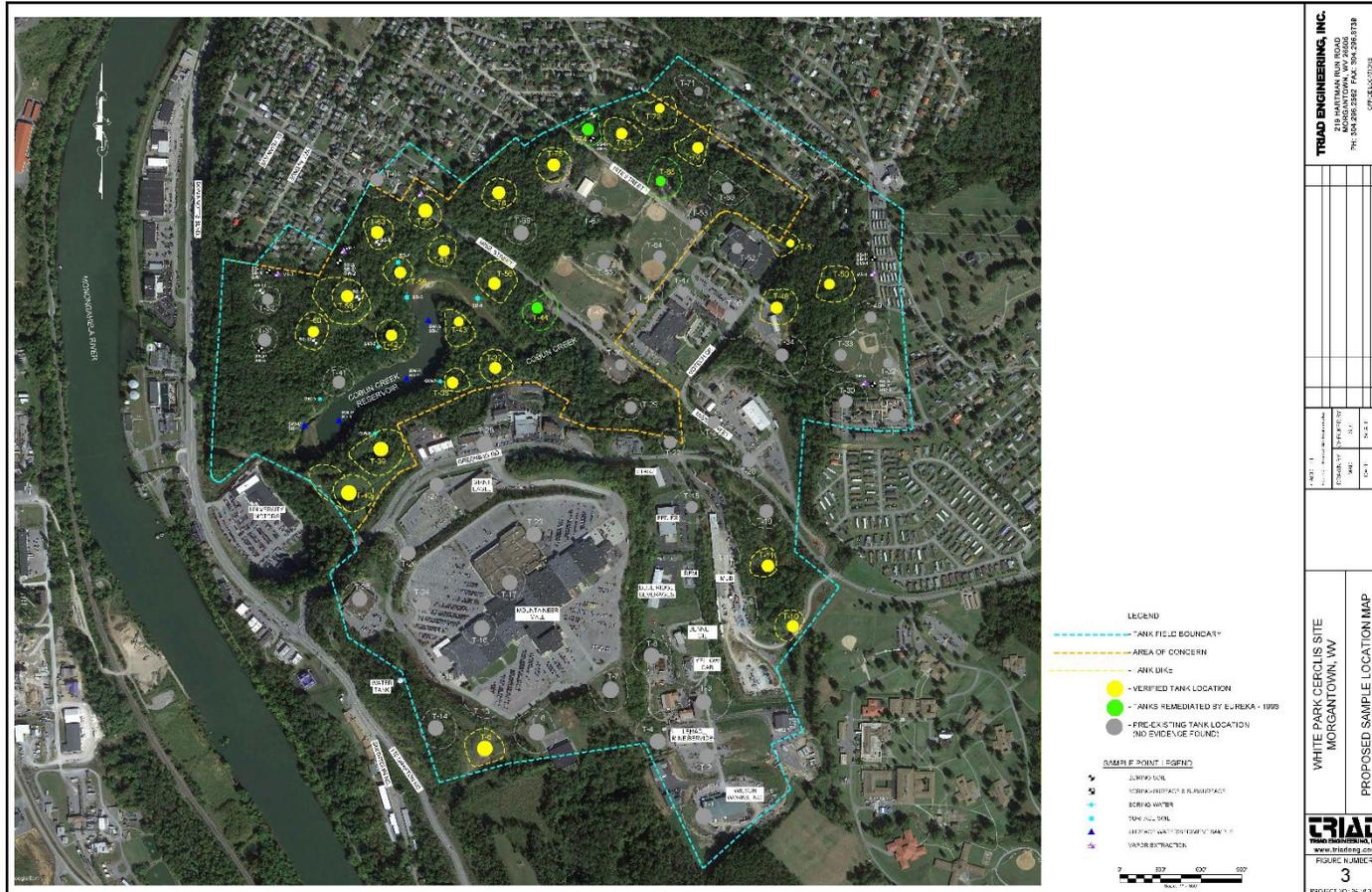


Figure 3: Location of Historical ASTs



**Table 2: Brownfield Cleanup Alternative Balancing Factor Evaluation**

Remedial Alternative	Effectiveness	Long-term Reliability	Implementability	Cost implications
1 No action.	Does not address potential risks.	Does not address potential risks.	Easy to implement.	No cost to implement. Likely cost implications for leaving property unusable and future liabilities for exposure to contaminants.
2 Remove all contaminants.	Reduces or eliminates risks.	Reliably reduces risks from contaminants.	Moderately difficult to implement. Would require significant disturbance to forested landscape and a public recreational asset.	Very high cost to excavate, transport, and dispose of contaminated soils and import replacement fill. Costs associated with destruction of mature natural forest assets.
3 Pathway elimination via capping and Risk Assessment through the WV VRP.	Effectively manages risk under regulatory oversight.	Long term reliability with moderate on-going operation and maintenance costs. Restricts access and usability of park features.	Moderately difficult to implement. Approach would severely limit planned redevelopment and use. Would require disturbance to forested landscape and a public recreational asset.	Moderate cost to implement but would not align with planned redevelopment or capture leverage funding commitments.
4 Pathway elimination via capping integrated into trail design and Risk Assessment through the WV VRP.	Effectively manages risk under regulatory oversight.	Long term reliability with moderate on-going operation and maintenance costs. Adds high value for long-term public recreation access, alternate transportation hub, school access.	Moderately difficult to implement. Approach would fully implement planned redevelopment and use. Will minimize disturbance to forested landscape and a public recreational asset.	Moderate cost to implement. Aligns with existing redevelopment plans and would leverage investment commitments from multiple stakeholders.



**Table 3: Estimated Comparative Cost for Cleanup Alternative**

	Unit	Quantity	Unit Price	Cost	Description
<u>Remedy Construction</u>					
New Trail: Diversion & Cover	LF	9871	\$ 25.93	\$ 255,936.25	Construction of new, sustainable trail that diverts visitors from old tank sites and serves as a cover for unavoidable AOCs. Proper trail design protects people by providing desired and accessible user experiences with appropriate density, therefore reducing proliferation of unauthorized trail development in potentially contaminated areas. This reduction in unauthorized trails helps protect ecological resources, and sustainable trail design also reduces concentration of runoff and sedimentation of nearby wetlands and waterways. Includes grading of onsite materials and acquisition, testing, and installation of imported materials.
Trail Closure & Ecological Restoration	LF	1750	\$ 10.00	\$ 17,500.00	Formally close existing, unauthorized trails. Includes replanting and signage / temporary fencing to protect restoration in fragile early stages.
Trigger layer (demarcation)	LF	987	\$ 2.00	\$ 1,974.00	Furnishing and installation of standard nylon construction fencing-style demarcation under areas of trail that need cover (those that cross known or encountered AOCs)
Contingency 10%	Project	1		\$ 27,541.03	
			<b>Sub Total</b>	<b>\$ 302,951.28</b>	
<u>Historical, Remedy Education/Demarcation/Health and Safety</u>					
Trail System Kiosks	Each	2	\$ 5,000.00	\$ 10,000.00	Overcome negative perception, educate remedy, demonstrate protect, green cleanup /climate change practices
Trail Intersection Signage	Each	10	\$ 750.00	\$ 7,500.00	Traditional trail wayfinding to further encourage users to stay on trail
Trail corridor blazes	Each	123	\$ 15.00	\$ 1,845.00	Traditional trail wayfinding to further encourage users to stay on trail
Large Historical/Ecological Interpretation Feature	Each	1	\$ 20,000.00	\$ 20,000.00	Educate public about history and remedy process
Enhanced Cover/ Elevated Features Skills Area	Each	1	\$ 50,000.00	\$ 50,000.00	Enhanced cover or elevated features over no-dig zone identified in Soil Management Plan.
			<b>Sub Total</b>	<b>\$ 89,345.00</b>	
Vountary Remediation Program Costs					
Risk Assessment Report (RAR)	HR	80	100	\$ 8,000.00	ESI Aug 22 Estimate



	Unit	Quantity	Unit Price	Cost	Description
Remedial Action Work Plan (RAWP)	HR	90	100	\$ 9,000.00	ESI Aug 22 Estimate
Land Use Covenant (LUC)	HR	15	100	\$ 1,500.00	ESI Aug 22 Estimate
Oversight of Engineering Controls	HR	50	100	\$ 5,000.00	ESI Aug 22 Estimate
Remedial Action Completion Report (RACR)	HR	50	100	\$ 5,000.00	ESI Aug 22 Estimate
Final Report	HR	50	100	\$ 5,000.00	ESI Aug 22 Estimate
WVDEP Oversight Fees	Each	1	\$7,100.00	\$ 7,100.00	Best Professional Judgement, similar project experience
NPDES Storm Water / BMP Design	HR	25	100	\$ 2,500.00	Best Professional Judgement, similar project experience
LUC Inspections	HR	12	100	\$ 1,200.00	Best Professional Judgement, similar project experience
			<b>Sub Total</b>	<b>\$ 44,300.00</b>	
<i>Contractual Engineer/Consultant</i>					
Surveying	Each	1	9500	\$ 9,500.00	Best Professional Judgement, similar project experience
As-Built Documents	HR	45	100	\$ 4,500.00	Best Professional Judgement, similar project experience
Procurement- Remediation and Trail Contractors	HR	60	100	\$ 6,000.00	Best Professional Judgement, similar project experience
			<b>Sub Total</b>	<b>\$ 20,000.00</b>	
			<b>Project Total</b>	<b>\$ 456,596.28</b>	

DRAFT

LEGAL ADVERTISEMENT

20071 NOVEMBER 2  
Public Notice of EPA Brownfields Cleanup Grant Application by the City of Morgantown

The City of Morgantown (City) is announcing plans to submit a Brownfield Cleanup Grant application to the United States Environmental Protection Agency (EPA) for remediation activities on the White Park Southside Cleanup, located at 1001 Mississippi Street in Morgantown, WV. This property has had environmental assessment activities performed in the past, including a Preliminary Assessment and Phase II Environmental Site Assessments. Assessment results indicate the presence of volatile organic compounds, semi-volatile organic compounds, and heavy metals in soils and surface water at the site. These environmental impacts require cleanup. The site has been entered into the West Virginia Voluntary Remediation Program.

This application is requesting EPA funds to help fund cleanup activities on the site. The EPA encourages public participation in these applications to ensure the local community is being informed and allowed to comment and provide input into the project.

The public is invited and encouraged to review and comment on proposed cleanup plans. These materials will be available for public review at the City Hall Annex, located at 430 Spruce Street, Morgantown, WV, and the Morgantown Public Library located at 373 Spruce Street. A summary of the project and proposed activities, and an Analysis of Brownfield Cleanup Alternatives, will also be made available November 9, 2022 at 6:00-8:00 p.m. during a public meeting hosted by the City. The public meeting will be held at the Hazel Ruby McQuain Park Train Depot located at 185 Garrett Street, Morgantown, WV 26505.

For questions, submit comments, or additional information, please contact Marc Glass, Downstream Strategies, LLC, at 304. 216.5294 during normal business hours or via email at [mglass@downstreamstrategies.com](mailto:mglass@downstreamstrategies.com).

# The Dominion Post

1251 Earl L Core Road  
Morgantown, WV 26505

(304) 291-9420

## PUBLISHER'S CERTIFICATE OF PUBLICATION

I, Jessica Roberts Advertising Director of  
THE DOMINION POST, a newspaper of general circulation  
published in the City of Morgantown, County and State  
aforesaid, do hereby certify that the annexed

Legal Notice

was published in the said THE DOMINION POST once a week  
for 1 successive week commencing on the  
2nd day of November, 2022 and ending on the  
2nd day of November, 2022.

The publisher's fee for said publication is \$60.67  
Given under my hand this 9th day of  
November, 2022.

*Jessica Roberts*

(SEAL)

Advertising Director of THE DOMINION POST

Subscribed and sworn to before me this 9th  
day of November, 2022.

*Brittany Merrill*

Notary Public of Monongalia County, W. Va.

My commission expires on the 18th day of  
Feb 2025



MEETING SIGN-IN SHEET			
<b>Project:</b>	White Park Southside Cleanup	<b>Meeting Date:</b>	November 9, 2022
<b>Facilitator:</b>	Drew Gatlin	<b>Place/Room:</b>	Hazel Ruby McQuain Park Train Depot 185 Garrett Street Morgantown, WV 26505

Name	Organization	Phone	E-Mail
1. Marc Grass	Downstream Strategies	304.216.5244	mglass@downstreamstrategies.com
2. SAMER PETRO	HR G	304.288.8232	spetro@hrs-inc.com
3. Jonell Strough	Mon Valley Green Space Coalition	304.516-0797	strough.jo@gmail.com
4. Damien Davis	City of Morgantown	304.289.7412	ddavis@morgantownwv.gov
5. Jenny Setin	City of Morgantown	304.685-6569	<del>jenny.setin</del> jsetin@morgantownwv.gov
6. Drew Gatlin	CITY OF MORGANTOWN	304.719.7900	JGATLIN@MORGANTOWNWV.GOV
7. Colin Wamsley	CITIZEN	304.276.3130	colinewamsleycycles.com
8. Danielle Trumble	City of Morgantown	304.601.1480	dtrumble@morgantownwv.gov
9. John Trumble	Citizen	(304) 601-0855	trumbell17@gmail.com
10.			

## MEETING: COMMUNITY COMMENTS AND RESPONSES

<b>Project:</b>	White Park Southside Cleanup	<b>Meeting Date:</b>	November 9, 2022
<b>Facilitators:</b>	Drew Gatlin, City of Morgantown Marc Glass, Downstream Strategies	<b>Place/Room:</b>	Hazel Ruby McQuain Park Train Depot 185 Garrett Street Morgantown, WV 26505

The November 9, 2022 community meeting to discuss the City of Morgantown's U.S. EPA grant application and draft ABCA was held at the Hazel Ruby McQuain Park Train Depot Public meeting space.

Meeting open: 6:00 pm

The meeting was facilitated by City Staff Engineer Drew Gatlin and co-hosted by Marc Glass of Downstream Strategies, LLC who prepared the draft ABCA. Print copies of the draft ABCA, large format printed maps of White Park, the proposed White Park Southside Trail, and surrounding area were made available. Large format poster boards of conceptual pedestrian/bike bridge designs sited at the future bridge location were displayed. A large screen monitor was used for presentation and guidance of the discussion of the draft ABCA and cleanup grant application.

Participants were encouraged to document their participation on the sign-in sheet provided.

Meeting concluded 8:00pm

The following summarizes community comments and facilitator responses:

Q1. One commenter noted that the White Park Southside Cleanup plan appears similar to the Route of the Hiawathas Trail in Idaho that also utilized brownfield funding to accomplish cleanup and that the trail is now very popular and that they'd very much enjoyed their experience on it.

A. The comment was acknowledged.

Q2. Which alternatives were considered, and which is recommended?

A. Each of the cleanup alternatives and balancing factors evaluated in the ABCA were discussed. Copies of the Draft ABCA and large format maps were available. The rationale for the recommended alternative to incorporate protective cover meeting the requirements of the West Virginia Voluntary Remediation Program (VRP) into trail construction was discussed in detail.

Q3. A commenter inquired what resources were going into the effort?

A. To date, the Morgantown Utility Board (MUB) has spent \$264,000 for site assessment and cleanup of the White Park Southside during its 2020 water line installation. MUB has committed a minimum of \$150,000 to fund a pedestrian/bike bridge connecting the White Park Southside to existing trails in White Park. MUB is also committed to the construction of a new parking area and site access via Greenbag Road from the south. MUB's commitments are for expense incurred for the bridge, parking area, and access road and the final total is not yet know. The West Virginia Land Stewardship Corporation (LSC) has spent \$35,000 for the May 2022 White Park Southside Trail Phase II ESA, Soil Management Plan, and preparing the West Virginia Voluntary Remediation Program (VRP) Application, with \$32,000 in funding committed from its existing brownfield assessment grant to complete site and human health risk assessment through the VRP. The City has paid \$31,000 for site assessment and VRP application fee, accepted October 5, 2022, with \$19,000 of committed funding available. The City

has already spent \$20,000 preparing the final comment draft (September 2022) City of Morgantown Regional Master Trail Plan, of which White Park is Zone 1, with an additional \$25,000 committed for finalizing the plan.

Q4. Will the trail be ADA accessible?

- A. The trail design will incorporate accessibility guidelines from the U.S. Forest Service 2013 Accessibility Guidebook on Outdoor Recreational Trails. Trails will feature compacted natural surfaces and where terrain allows, grades that provide easier passage.

Q5. Will there be access to Dorsey's Knob? Will this include a push button traffic light.

- A. A trail access point is planned for the light-controlled intersection at Greenbag Road and Mountaineer Mall that provides a means to access Dorsey's Knob park. The intention is that this light will have push button activation between the White Park Southside and Dorsey's Knob.

Q6. What is the schedule and how soon will the trail be usable.

- A. Trail construction will begin after human health and ecological risk assessment and VRP approval of the Remedial Action Plan trail design. Limited additional assessment needed for risk assessment is planned for the first quarter 2023. Start of trail construction is anticipated during the third quarter 2023 and will require approximately 60-days to complete.

Q7. Will the White Park Southside Cleanup provide a way for the community to access White Park from neighborhoods across Dorsey Avenue?

- A. The White Park Southside Trail is not a portion of White Park adjacent to Dorsey Avenue. However, the City is planning several connector trails that will provide improved access from neighborhoods to White Park and along the Dorsey Avenue corridor.

Q8. Will the City reach out to adjacent property owners, such as the Marjorie Gardens public housing facility, Bluegrass Village mobile home park, South Middle School?

- A. Yes. Specific outreach was performed to known trail user group leaders and stakeholders via listserv and direct contact inviting their membership to attend this community meeting. A community notification legal add was published in the Dominion Post on November 2, 2022 stating where the draft ABCA was available for review and comment, and inviting the community to the November 9, 2022 public meeting. If the U.S EPA brownfield cleanup grant application is selected for funding, the ABCA will be finalized and made available for additional public review and comment as part of pre-cleanup activities. Future community involvement for trail planning throughout White Park will include publishing of on-line user surveys and invitation to a series of community planning meetings.

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text" value="11/21/2022"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text" value="BF"/>	
<b>State Use Only:</b>		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: <input type="text" value="City of Morgantown"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="55-6000215"/>	* c. UEI: <input type="text" value="C296B5GYJL78"/>	
<b>d. Address:</b>		
* Street1: <input type="text" value="389 Spruce Street"/>	Street2: <input type="text"/>	
* City: <input type="text" value="Morgantown"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="WV: West Virginia"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="26505-5579"/>	
<b>e. Organizational Unit:</b>		
Department Name: <input type="text" value="Administration"/>	Division Name: <input type="text" value="Special Projects"/>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
Prefix: <input type="text"/>	* First Name: <input type="text" value="Vanessa"/>	
Middle Name: <input type="text"/>		
* Last Name: <input type="text" value="Reaves"/>		
Suffix: <input type="text"/>		
Title: <input type="text" value="Special Projects Manager"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="304-284-7418"/>	Fax Number: <input type="text" value="304-284-7430"/>	
* Email: <input type="text" value="vreaves@morgantownwv.gov"/>		

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

Environmental Protection Agency

**11. Catalog of Federal Domestic Assistance Number:**

66.818

CFDA Title:

Brownfields Multipurpose, Assessment, Revolving Loan Fund, and Cleanup Cooperative Agreements

**\* 12. Funding Opportunity Number:**

EPA-I-OLEM-OBLR-22-09

\* Title:

FY23 Guidelines for Brownfields Cleanup Grants

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

City of Morgantown Brownfield Cleanup Project

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="500,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="500,000.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed: