



October 31, 2019

WV Department of Environmental Protection  
Division of Water and Waste Management  
601 57th Street South East  
Charleston, WV 25304

Re: WVG611896

Attn: Kathy Emery

Ms. Emery:

West Virginia Rivers Coalition, on behalf of our members, and the undersigned organizations respectfully submit the following comments on the Rockwool's Multi-Sector Industrial Stormwater permit. Because this facility is located in unstable and unpredictable karst terrain, directly adjacent to wellhead protection areas, increased risks to water resources are present.

An individual permit is warranted and would put WVDEP in a position to provide more oversight and additional protections for extremely vulnerable water resources. Section B.1. of the Water Pollution Control Permit WV0111457 in accordance with 47 CSR 10.13.6.b.2.A gives the Director the authority to require an individual permit. We petition the Director to use this authority by requiring the applicant to apply for an individual permit.

Additionally, critical information within the permit application is lacking. Without this information, WVDEP cannot adequately certify that the facility will comply with the requirements of the general permit. WVDEP must request additional information to adequately protect water resources.

**The geotechnical analysis must be included with the application.** The Integrated Environmental Plan (IEP) references a geotechnical investigation that occurred in 2017. However, the results of the geotechnical analysis were not included in the report. The information on the soil borings and groundwater investigations is critical for the WVDEP to fully understand the risks to groundwater in the karst terrain. WVDEP must request the full results of the geotechnical investigation to be submitted with their application.

**Information on the aboveground pipeline infrastructure is lacking.** The IEP mentions that the facility will contain aboveground pipe racks to transport process water. These pipelines are not located on the facility maps. There is no mention of the size or location of the piping infrastructure. More information is needed on the amount of process water being transported

through these pipelines, where they are located, and if there are safety features such as emergency shutoff valves. The chemical makeup of the process water is unknown. This contaminated water could be a significant contamination threat. WVDEP must request additional information on the chemical components contained in the process water and what safety measures are in place to prevent or contain a pipeline breach.

**Information on the rainwater re-use pond is lacking.** The rainwater re-use pond says it may contain dust and slag which may concentrate within the pond and compromise the geosynthetic liner system. The pond is supposed to be a closed loop system with no discharge, however it is located directly adjacent to Outfall 002. The pond is also located on four separate sinkholes that opened up during construction and were reported to WVDEP as of 6/21/19. The structural integrity of the landscape on which the rainwater re-use pond is situated is questionable. More information on the severity of those sinkholes is needed, including size, depth and mitigation measures. If more sinkholes form under the rainwater reuse pond, the structural integrity of the pond could be compromised causing the contents of the pond to leach into the groundwater. According to the *Stormwater Guidelines in the Chesapeake Bay Watershed Version 2.0*, wet ponds are discouraged in Karst regions. "As a general rule, the stormwater system should avoid large contributing areas, deep excavation or pools of standing water." WVDEP must require Rockwool to re-design the facility based on the guidelines contained in Section 6.3 Discouraged Practices. Monitoring should also be required for the rainwater re-use pond.

**Melt for re-use area information is lacking.** All of the facility maps include a melt for re-use area. This area is located outside of the building structures. The area appears to be exposed to the elements. The Post Development Drainage Area map shows the melt for reuse area draining toward the rainwater re-use pond. However, there appears to be nothing preventing contaminants from this area to move downgradient to the bioretention pond and discharging from Outfall 002. More information on the materials contained in the melt for reuse are is needed including protective measures and best management practices to prevent the materials from entering the environment.

**The pollutant analysis is lacking.** Analysis for eight baseline parameters was not submitted by the applicant as required. We request an extension of the comment period until the analysis of those parameters is submitted and the public has an opportunity to review the analysis. If the applicant cannot produce the analysis until the facility is operational, they should submit an estimate based on similar discharges at their other facilities.

**The information on toxic pollutants is incomplete.** In the application, Table 2 in Section 18B is missing critical information. There is no information provided on whether all pollutants are present or absent in Outlets 001 and 002.

**Spill prevention and response information is lacking.** The applicant states in the Spill Prevention, Control and Countermeasure Plan that two oil/water separators will be utilized onsite. The oil/water separators will be appropriately sized, but the exact size of those systems are not specified. Furthermore, the locations of these systems are not shown on any facility maps. Additionally, the SPCC mentions routine inspections, but the frequency of those inspections is not defined.

**Enhanced spill prevention and response measures are needed.** Because of the increased risks to groundwater, WVDEP must require enhanced spill prevention and response measures, including increased size of secondary containment on ASTs, leak detection on all ASTs and tertiary containment systems.

**The monitoring requirements are inadequate.** WVDEP should increase the frequency to monthly during startup and the first year of operation when most of the problems are likely to occur. As an additional measure of protection, WVDEP should include groundwater monitoring. *The Groundwater Protection Rule, 47 CSR 58, 4.9 Monitoring* states, "New facilities shall monitor groundwater upon order of the director if the director reasonably believes that an industrial establishment or activity has the potential to contaminate groundwater." The Rockwool facility has the potential to contaminate groundwater; therefore, we encourage the Director to use your authority to require groundwater monitoring.

**The Material Data Sheets (MDS) are listed as confidential.** The public has no information on pollutants used at the facility. WVDEP must review the MDS for all materials used at the facility and add those constituents to the monitoring requirements. In addition, WVDEP should require the MDS be shared with emergency response personnel and water utilities in Jefferson County.

In Appendix E, the facility should be re-classified with a Substantial Harm Determination because the facility is located at a distance such that discharge from the facility would shut down a public water supply.

Signed,

Angie Rosser  
West Virginia Rivers Coalition