



# WEST VIRGINIA RIVERS

October 31, 2019

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

Re: WVR108876

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 Construction Stormwater Permit WVR108876 (permit).

WVDEP must not re-issue this permit until the following issues are addressed.

**There are discrepancies in the application on the receiving stream.** The online application lists Rockymarsh Run as the receiving stream; however, the Stormwater Pollution Prevention Plan/Groundwater Protection Plan lists the receiving streams as tributaries of Shaw Run and Opequon Creek. This discrepancy must be resolved.

**The applicant has already established a history of non-compliance.** This permit was granted in 2017; however, the applicant has already received a Notice of Violation (NOV) for failing to report sinkholes. This non-compliance is unacceptable and puts public health at risk. Rockwool should be fined for any additional NOV's to deter future non-compliance.

**Rockwool's Structural Sinkhole Repair Procedure is woefully inadequate.** The procedure allows for up to 24 hours to pass before a sinkhole is reported and up to 3 days to protect the feature from receiving runoff. This lax approach could result in groundwater contamination. Sinkholes should be reported and repaired immediately. Substantial improvements to the sinkhole repair procedure, we have already seen Rockwool's non-compliance in not properly reporting sinkholes.

Sinkholes or dropouts encountered during construction must be reported to the spill notification hotline. WVDEP should require dye testing on sinkholes not immediately mitigated to ensure there is no direct connection to a drinking water source or recreational waters.

**More frequent inspections are warranted in karst terrain.** Inspections of erosion controls should occur once every 4 days or after a 0.25-inch rain event.

Signed,

Angie Rosser  
West Virginia Rivers Coalition