



Comment to WVDEP on Rockwool's Stormwater Permits

Rockwool is a mineral wool insulation manufacturing facility proposed in Jefferson County. WVDEP is accepting public comments on two of Rockwool's permits; the Construction Stormwater Permit (WVR108876), which regulates erosion control and stormwater runoff during construction and the Industrial Stormwater permit (WVG611896), which regulates permanent stormwater management following completion of the facility. **You can submit comments to WVDEP on these permits through November 4.**

THE FOLLOWING ISSUES RAISE SERIOUS CONCERNS FOR OUR WATER RESOURCES:

- **Karst Terrain and Presence of Sinkholes:** The facility is situated in karst terrain with at least 17 sinkholes identified onsite to date. An underground stream was mapped by Karst experts beneath the facility¹. Permitting this facility on an unpredictable landscape increases the potential impacts to groundwater.
- **Potential Groundwater Impacts:** The depth to groundwater is about 60 feet at the facility. Where a sinkhole is present, there is a direct connection to groundwater and a higher potential for contamination should runoff enter a sinkhole.
- **Nearby Drinking Water Sources:** The facility is 1,500 feet from the wellhead protection areas for an elementary school and a residential neighborhood in Karst terrain which increases the risks for drinking water contamination.
- **Nearby Recreation Water:** An underground stream is mapped beneath the Rockwool facility which connects to an old quarry with two ponds that are now used for recreation. Potential groundwater contamination increases exposure risks at the nearby recreational waters.
- **High Contamination Potential:** A total of 13 Aboveground Storage Tanks (ASTs) are located on site. The data sheets for materials used at the facility are listed as confidential. If there was a spill, the community would not even know to what they were exposed.

WVDEP cannot approve these permits as they currently stand. Doing so would be reckless and irresponsible and put the community's drinking water source and recreational waters at

¹ Jones, W.K., 1997, Karst hydrology atlas of West Virginia. Karst Waters Institute, Charles Town, W.Va.



risk. WVDEP must require individual permits for the Rockwool facility to implement additional measures to mitigate risks and protect groundwater resources.

Construction Stormwater Permit (WVR108876)

- 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.
- 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 them from 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 laid-back approach could result in groundwater contamination. Sinkholes should be reported and repaired immediately.
- 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.

Industrial Stormwater permit (WVG611896)

- The facility should be 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.
- 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.
- The monitoring requirements are inadequate. WVDEP should increase the frequency to monthly during startup and the first year of operation and include groundwater monitoring.



WEST VIRGINIA RIVERS

- Since 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.

Submit comments to WVDEP by November 4, 2019 by:

1. Commenting online through WV Rivers action tool: <https://tinyurl.com/y5qpe9d9>
2. E-mailing with the permit numbers in the subject line to dep.comments@wv.gov
3. Mailing written comments referencing the permit numbers to:

Director, Division of Water and Management, DEP
ATTN: Sharon Mullins, Permitting Section
601 57th Street SE
Charleston, WV 25304-2345