

# Jefferson County Foundation, Inc.

August 31, 2021

Harold Ward  
Secretary  
Department of Environmental Protection  
601 57<sup>th</sup> Street, S.E.  
Charleston, WV 25304

Kathy Emery, Director  
Jeremy W Bandy, Acting Deputy Director  
Division of Water and Waste Management- Environmental Enforcement,  
West Virginia Department of Environmental Protection  
601 57th Street S.E.  
Charleston, WV 25304

Via email

Re: URGENT Stormwater Situation at Rockwool with the Potential to Harm Human Health

Dear Secretary Ward, Director Emery, and Acting Deputy Director Bandy,

In light of the impending heavy rainfall from the storm resulting from Hurricane Ida, and the sampling report for the second quarter of 2021 that noted aluminum in concentrations 210 times the reporting limit at Rockwool's facility in Ranson, the Jefferson County Foundation urgently asks that the DEP conduct an immediate inspection of Rockwool, require Rockwool to immediately address any possible sources of stormwater pollution, and stop operation at the facility in the meantime.

After reviewing Rockwool's second quarter sampling data for outlet 002 (the only one reported this quarter) the Foundation noted that the discharge had very high aluminum levels at 4.2 mg/L. The Foundation itself then conducted aluminum testing at Elk Branch Spring #1 and found aluminum at a concentration of 189 µg/L. The Foundation had previously tested the aluminum at this location in late April 2021. No aluminum was detected at that time (with a minimum detection limit of 100 µg/L). This spring was tested because a previous USGS dye tracer study demonstrated groundwater flow from a sinkhole close to Rockwool (less than one mile from outlet 002) to this location.<sup>1</sup> We believe that the elevated aluminum in Elk Branch Spring #1 is attributable to the aluminum being discharged from Rockwool's outlet number 002.

Further, we believe that this aluminum in Rockwool's stormwater discharge from outlet 002 does not stem from "land disturbance still undergoing stabilization" as Rockwool suggests in its letter

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<sup>1</sup> Kozar MD, Hobba WA, Macy JA. Geohydrology, water availability, and water quality of Jefferson County, West Virginia, with emphasis on the carbonate area. US Department of the Interior, US Geological Survey; 1991.

to DEP dated July 2, 2021, but rather that this aluminum has originated in Rockwool's Melt for Reuse or Raw Materials. According to Rockwool's PSD air permit Preliminary Determination and Fact Sheet,<sup>2</sup> Rockwool uses several high alumina content materials as raw material. It appears from the photos taken by the inspector and from our own recently-taken photos that Rockwool is storing raw materials in addition to Melt for Reuse in the Melt for Reuse area.<sup>3</sup> It also appears from the pictures in the inspection report from July 7, 2021 that this material is being washed out into the grassy area next to the Melt for Reuse area. This grassy area is in the drainage area of the bioretention pond and outlet 002.

We are thus extremely concerned that the aluminum in the discharge from outlet 002 is in fact emanating from the Melt for Reuse itself or the aluminum containing materials stored in the Melt for Reuse area or elsewhere at the Rockwool site. For example, stormwater runoff from Rockwool's raw material handling areas and Melt for Reuse area also contains contaminants from these areas. This material would presumably also contain aluminum. This material settles in the Reuse Pond Settling Pond. As the Foundation's Letter to the DEP dated August 24, 2021 noted, this material appears to be spilled on the road and grass area drained by outlet 002. The aluminum in outlet 002 could also be originating at least in part from this material.

In the interests of the health of residents of Jefferson County, we respectfully but urgently demand that you:

1. Stop operation at the facility until this issue can be addressed and resolved.
2. Immediately and thoroughly inspect the site with your most qualified inspectors and engineers. Keenly evaluate the Melt for Reuse area, the raw material handling areas, and the Reuse settling pond for stormwater flow (especially effects of high rain volumes) to determine if any stormwater or material from these locations is escaping the stormwater system leading to the Reuse Pond or overflowing into the areas drained by outlet number 001 or 0002.
3. Immediately and before the impending large storm event on September 1, devise emergency solutions to these issues and require Rockwool to immediately and before the impending large storm event implement these solutions.
4. Following the storm event, re-inspect the site and determine if any of the stormwater from the drainage area of the Reuse Pond escaped to other drainage areas or overflowed.
5. Notify the public of any overflow or escape of stormwater contaminated with raw materials or Melt for Reuse.

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<sup>2</sup> R14-0037 Preliminary Determination/Fact Sheet For The Construction Of Roxul Usa, Inc.'s RAN Facility, page 5 of 44. It states that raw materials typically used for stone wool insulation will include "high alumina content materials such as bauxite, kaoline clay and aludross (by-product of the smelting process in the creation of aluminum from bauxite)"

<sup>3</sup> In the July 7, 2021 inspection report photo labeled "storage area" and the photo the Foundation submitted with its August 24, 2021 letter to the DEP. Material can be seen in the Melt for Reuse area that is not the same consistency as that described in the PSD air permit for "Melt for Reuse", and the groups of material in the Melt for Reuse area appear very desparate but of relative uniform consistency within each pile.

We again urge the Department to require Rockwool to obtain an individual NPDES Stormwater Permit that will address all of these issues and protect water resources of the surrounding area and the region. However, this request is for immediate intervention by the inspection staff in light of the impending excessive rain water.

With these heavy rains approaching Jefferson County, we are exceedingly concerned that Rockwool's inappropriate handline of stormwater discharge will further endanger the water resources of the nearby and surrounding areas. **Please** take these actions with urgency. Thank you and we look forward to information about these actions being made public as soon as possible.

Regards,

*Christine L Wimer*

Dr. Christine Wimer  
President  
Jefferson County Foundation, Inc.

CC (via email):

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