



09/01/2021

Mr. Robin C. Dolly
Environmental Inspector Supervisor
Division of Water and Waste Management
WV Department of Environmental Protection
22288 Northwestern Pike,
Romney, WV 26757.

Dear **Mr. Dolly**,

This letter is in response to the questions addressed to Roxul USA, Inc. d/b/a ROCKWOOL during the West Virginia Department of Environmental Protection's ("DEP") September 1, 2021, inspection of the RAN-5 Facility.

Question 1:

Next to the settling pond for the Reuse Pond, there are what appear to be containers with material in them. The settling pond for the Reuse Pond appears to contain liquid (at least in part) and be full. The access road just outside the settling pond seems to be wet while none of the other surfaces appear to be wet (i.e., this does not appear to be from rain as there is no other evidence of rain). The access road and a large area of the grass area around the containers and the settling pond for the Reuse Pond appear to have sediment on them. What is occurring here? Is the settling pond of the Reuse Pond being cleaned out? If so, is this material on the road and the grass area sediment from the settling pond? Was this being done while the pond is wet or contains liquid?

Answer:

As part of the transition from the Construction Stormwater General Permit to the Multisector General Permit, ROCKWOOL has been engaged in cleaning the weir for the rainwater collection basin, which is also known as the Rainwater Reuse Pond or simply the Reuse Pond. This work is necessary to remove accumulated raw materials and sediment and has been performed by pumping water from the weir into settling tanks for separation and drying. Once dried, the sediment will be removed by a certified disposal company and the water returned to the rainwater collection basin after passing through a filter bag. ROCKWOOL also stresses that the rainwater collection basin has no outlet and does not discharge.

ROCKWOOL cannot comment on whether a particular surface was wet without reference to a specific date and time, but it can confirm that any water pumped from the weir has gone directly into the settling tanks and has not been discharged to the ground. There likewise has not been any sediment stored on the ground as part of this work.

Question 2:

It appears from this picture that Rockwool has been cleaning out the settling pond while it is still wet, not after it has been dried out, as the permit materials require. It also appears that this material is being collected in containers. Does this mean that there was a “petroleum spill or similar” event? It is alarming that this material has been spilled or tracked across the ground.

Answer:

There has not been any spill at the RAN-5 Facility since ROCKWOOL commenced operations.

Question 3:

During normal operation this material contains the eroded material from the Melt for Reuse (area B170) area which itself contains melted coal, slag, coke, and other materials. These contaminants are concerning enough, however, if a spill of petroleum or other similarly hazardous product has been spilled this is even more concerning. Any material spilled on the ground in this location is presumed to be carried quickly via indirect infiltration into the groundwater.

What procedure is occurring here? Has there been a petroleum spill or spill of some similar concern that is warranting a different procedure than described for normal operating procedures in Rockwool’s response to comments in the MSGP Application? Why is the normal operating procedure in Rockwool’s response to comments in the MSGP Application not being followed (i.e., why was the settling pond for the Reuse Pond not dried out prior to clean out)? Why is material being allowed to contaminate the ground

Answer:

As stated above, there has not been any spill at the RAN-5 Facility since ROCKWOOL commenced operations. The water and sediment has been placed into settling tanks to allow for a cleaner process for drying the sediment. The sediment has not been placed on the ground. For clarification, the B170 pad stores melted raw material from the melting process that will be recycled back into the process. All drainage inlets in and around the material holding areas are channelled to the rainwater collection basin, which ROCKWOOL again notes has no outlet and does not discharge.

Question 4:

Vehicle tracks are visible in multiple locations on the site that appear to show prolonged use. Why are vehicles being used in this location? Why are they necessary even though not provided for in the permit? How are materials from the manufacturing areas being prevented from being tracked by these vehicles on to these grass or dirt surfaces and infiltrating into the groundwater?



Answer:

Utility Vehicles are used on site to conduct various tasks such as maintenance and mowing activities. Materials for the manufacturing process are transported in covered containers and stored in a three-sided building with roof and impermeable floor in order to prevent track out.

Question 5:

The large northern bioretention area does not seem to be operational in that it has no vegetation. How will this bioretention area achieve best management of the stormwater without vegetation? How will the media be maintained until vegetation is able to grow in this bioretention area? The stormwater outlet for this stormwater structure had well above the reportable limit of heavy metals during the second quarter of 2021. Why is this bioretention area not operational and what is being done to address this situation?

Answer:

For Outlet 002, the sample indicated that the benchmark values for iron and aluminium were in excess of benchmark values. All other parameters were below benchmark values. While the facility is currently required to monitor only, ROCKWOOL reviewed the site conditions to assess potential causes for the elevated iron and aluminium values. ROCKWOOL believes that the cause may be attributable to ongoing land disturbance within the drainage area and the pending completion of the bio-retention area soil layer and planting. The disturbed areas were seeded and mulched in June 2021 and germination and improvement in vegetated coverage of these areas is expected in the third quarter. Thus far, heavy precipitation has prevented us from completing task since we require dry conditions to plant.

We note that there are various interpretations and assumptions regarding ROCKWOOL's legal obligations and operations that are embedded within the foregoing questions. Any failure to address or respond directly to those interpretations and assumptions does not reflect acquiescence, agreement, or waiver of any rights. ROCKWOOL appreciates the opportunity to respond to these questions and invites you to follow up with me with any additional questions or concerns.

Sincerely,

A handwritten signature in black ink that reads 'Ryan Durrill'.

Ryan Durrill
SHEQ Manager