



11/24/2021

Yogesh Patel

WV Department of Environmental Protection
Division of Water and Waste Management
601 57th St. SE
Charleston, WV 25304
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Dear **Mr. Patel**,


On October 25, 2021, Roxul USA, Inc. d/b/a ROCKWOOL reported the Q3 benchmark sampling results for its RAN-5 Facility to the Department of Environmental Protection (DEP). Because those results reflect a second exceedance of the benchmark monitoring concentrations for Iron and Aluminum at Outlet 002, ROCKWOOL has considered the need for subsequent actions under Section 6.a.2 of the modified 2020 Multisector General Permit, Permit No. WV0111457 (2020 MSGP). ROCKWOOL has, for instance, commenced an evaluation of its northern bioretention area for baseline performance and potential improvement. This evaluation is a necessary predicate to determining what corrective action, if any, is required under Section 6.a.2 of the 2020 MSGP.

This letter is being submitted under Section 6.a.2.ii of the 2020 MSGP to inform DEP that its evaluations, and therefore any corrective action, cannot be completed within the default 45-day time frame. There are at least two impediments. First, it is necessary to identify, schedule, perform, and review the evaluations of the northern bioretention area. The timing of these actions are limited by the schedules of the particular professionals and/or laboratories, as well as the cold weather conditions that have begun to take hold at the RAN-5 Facility. Second, the ability to undertake any corrective action at the northern bioretention area is dependent on warmer weather conditions, which are not expected to return until late Q1 or early Q2 of 2022.

Assuming weather conditions allow, ROCKWOOL expects to complete its evaluation, as well as any necessary corrective action, by April 30, 2022. In the interim, ROCKWOOL has taken temporary corrective action to stop discharges from Outlet 002 by using hoses and pumps to divert stormwater from the northern bioretention area into the Rainwater Retention Basin (No Outlet).

ROCKWOOL will notify DEP if there are any changes to its expected timeline for completing its evaluation and any corrective actions. Thank you for your attention, and please contact me if you have any questions.

Sincerely,


Ryan Durrill
SHEQ Manager