

**Environmental
Resources
Management**

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October 25, 2018

Mr. Tommy George
Environmental Inspector
Environmental Enforcement/WV
22288 Northwestern Pike
Romney, WV 26757-8005



**RE: Response to NOV #W18-19-047-TAG
RAN 5 Project
Ranson, Jefferson County, WV
WVR108876**

Dear Mr. George:

Environmental Resources Management, Inc. (ERM) on behalf of Roxul USA Inc. (Roxul) is providing the following response to NOV #W18-19-047-TAG issued on 5 October 2018 by the West Virginia Department of Environmental Protection (WVDEP), Office of Environmental Enforcement in relation to violations of the WV/NPDES General Water Pollution Control Permit No. WV0115924, Registration No. WVR108876. WVDEP comments are included for reference, followed by ERM's response. Supporting documentation including photos, site drawings, or other information, is attached to this letter as identified in the below responses.

WVDEP Comment 1: Section D.1 - Proper Operation and Maintenance - Drop inlets near the central portion of the project are in need of maintenance.

ERM Response: The facility has removed accumulated sediment in the vicinity of the drop inlets on the central portion of the site and has placed compost filter sock around the inlets between October 01 and 08, 2018. Inlets identified by the inspector as having particular issues during the inspection have also had a graded aggregate filter berm placed around the inlet on October 10, 2018 as a supplemental and more robust best management practice to minimize the potential for sediment-laden surface water runoff from entering the storm water inlets.

WVDEP Comment 2: Section G.4.e.2 - Controls - Filter sock improperly installed. SWPPP calls for triple stack filter sock at the end of the rock outlet protection for sediment basin 1.

ERM Response: The facility has installed a triple stack compost filter sock at the end of the rock outlet protection for Sediment Basin 1 on October 9, 2018. Areas near the rock outlet apron identified in the photos have also been stabilized with rock as of October 8, 2018. As indicated in the inspection report, sediment laden water has not left the site.

WVDEP Comment 3: Section G.4.e.2.A.ii - Structural Practices - Permittee has failed to provide inlet protection for sediment control structure near the forebay of sediment basin 1.

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ERM Response: The facility has placed rock inlet protection around this pipe entering the forebay on October 8, 2018

WVDEP Comment 4: Section G.4.e.2.A.ii.f - Fill Slopes - Permittee has failed to protect fill slopes near the forebay of sediment basin 1.

ERM Response: The facility performed slope repair and tracking of this slope facing the forebay of the sediment basin 1. A soil berm has been established along the crest of this slope to prevent stormwater runoff from the building pad from going over the slope. This work was completed on October 8, 2018.

WVDEP Comment 5: Section G.4.e.2.A.i.b - Duration of Construction Activities - Interim stabilization not provided on areas where construction activities have temporarily ceased for more than 14 days. Area noted was near the forebay of basin 1.

ERM Response: The facility has tracked and finished this slope and has seeded and mulched as of October 8, 2018. Further, other areas around the location that were approaching 14 days of inactivity have been tracked, seeded and mulched.

WVDEP Comment 6: Section F.2.a - Immediate Reporting - Sinkhole was observed in basin 1 and was not reported.

ERM Response: The facility has reported the identified sinkhole to the WVDEP and made WVDEP aware of other features identified. The sinkhole repair procedure has been further developed to incorporate WVDEP guidance and was submitted for final WVDEP review on October 18, 2018. The plan was approved for implementation by WVDEP on October 19, 2018.

Should you have questions, please feel free to contact me at 304.757.4777 Ext. 103 or by email at david.connelly@erm.com. Thank you for your assistance.

Sincerely,



David T. Connelly, LRS
Senior Consultant

Attachment

Cc: Mette Drejstel (Roxul), Ken Cammarato (Roxul) ERM electronic file