

Concerned Citizens Against Rockwool

A Project of Jefferson County Vision

August 29, 2018

West Virginia Dept. of Environmental Protection
Office of Environmental Remediation
Casey Korbini, Deputy Director for Remediation Programs
601 57th Street SE
Charleston, WV 25304

Dear Deputy Director Korbini:

I am writing on behalf of several thousand community members who have expressed concern over the recent and ongoing excavation of the Rockwool (aka Jefferson Orchards) site located at 365 Granny Smith Lane, Ranson, WV (formerly Kearneysville).

We are hereby requesting an immediate halt to further development of the Rockwool site until our concerns have been addressed by DEP. Below, we have outlined our immediate concerns.

1. Public Health Concern

As DEP indicated on the DEP website: "Contaminants of potential concern include chemicals associated with past use of the property as an apple orchard and include lead and arsenic from lead arsenate pesticide, as well as select organo-pesticides. Additional contaminants of potential concern may be identified through site investigation activities."

To date, the public has not been informed about what tests have been performed and which contaminants, beyond lead and arsenic, have been found and at what levels. Research indicates that lead and arsenic may pose dangers to the public through air, soil, and water systems once disturbed. The site is less than 1,500 feet from North Jefferson Elementary School, Fox Glen Development, and numerous single-family units and businesses. The geology consists of karst, meaning groundwater may be affected over an even larger area than described above.

2. Public Notification/Involvement Has Not Occurred

DEP guidance calls for public notification and ongoing involvement by the public prior to, and during remediation. That notification and involvement has not occurred. Citizens have called your office repeatedly and they have yet to be provided with copies of Site Assessment, VRRRA Application, Voluntary Remediation Agreement, publication of the name, address and phone number for the Licensed Remediation Specialist, the DEP Project Manager, or a number for a hotline.

3. Incomplete Posting of Application

On 7/17/2017, DEP published a notice that an application had been submitted by Jefferson Orchards, Inc. That notice did not meet DEP's own minimum requirements as outlined in DEP's Guidance. The application failed to provide:

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- a. Name and address of the applicant (it provided the location of the Orchard, but not the name and address of the applicant;
- b. Proposed cleanup methods and proposed methods to control possible health effects;
- c. Location where the application can be reviewed;
- d. Name, address, phone number of applicant's public contact person (the notice identified DEP's person in charge of public relations, but not the applicant's public contact person).

Due to all of the above concerns, we request an immediate halt to excavation and all other disturbances to the site until the items listed above have been addressed and completed.

Sincerely,

Leigh Smith
Jefferson County Vision