



Corporation of Harpers Ferry

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August 31, 2018

**A statement and call to action to all stakeholders concerning
the proposed Rockwool major stationary source of hazardous air pollution
from the Corporation of Harpers Ferry
(reference links attached)**

The Town of Harpers Ferry is known around the world for the part it has played in history, and for scenic splendor that President Thomas Jefferson described as ‘worth the voyage across the Atlantic’.

The recent outcry of concern and opposition from more than 9,000 Jefferson County citizens to the proposed Rockwool heavy industrial manufacturing plant, to include two smokestacks over 220 feet in height, has put Harpers Ferry at the crossroads of history, once again.

“Harpers Ferry’s history can help us understand some unintended environmental impacts and provide a cautionary tale for today’s environmental challenges... Before the 1940s, the link between coal burning, large-scale industry and human health impacts was not well understood. Today, like Harpers Ferry in the 1800s, people who live near smoke stacks experience a variety of health problems. The same pollution that directly impacts human health is contributing to climate change... Although there are no longer smokestacks in Harpers Ferry, the park is still impacted by industrial pollution from industries and cities upwind. Prevailing winds carry pollutants to the town. Harpers Ferry’s unique topography traps these pollutants in the air surrounding the town for a prolonged period of time.” - nps.gov

Concerned citizens are demanding a halt to this project and have urged the Harpers Ferry Town Council to help stop development of the Jefferson County Rockwool site, planned for the historic Jefferson Orchard site across from North Jefferson Elementary School and in close proximity to three other county schools. In addition to health and environmental concerns about toxic emissions and air quality, citizens fear potential contamination or loss of productivity could threaten our primary water source for the Town of Harpers Ferry, the Elks Run Watershed.

The Harpers Ferry Watershed Protection Plan outlines our responsibility for stewardship of our clean water supply and identification of areas of critical concern, where development could result in irreversible damage. These include fragile or historical lands, such as shore-lands of the Potomac River, streams, and unique scenic and historic areas. Since activities at the proposed facility have the potential to release contaminants that could potentially impact our public water supply, it could be identified as a PSSC - Potential Source for Significant Contamination to the Harpers Ferry water supply. A Zone of Critical Concern within our watershed requires detailed scrutiny due to its proximity

Page Two

August 31, 2018

to the surface water intake and the intake's susceptibility to potential contaminants within that corridor. Dispersion models created by Rockwool appear to show toxic particulate matter dispersion in Zones of Critical Concern and Zones of Peripheral Concern as defined in the Harpers Ferry Watershed Protection Plan.

The Mayor and elected members of the Harpers Ferry Town Council are required to follow our town's Comprehensive Plan and protect the historic character of the town and safeguard the natural environment.

Our natural environment includes federally protected viewsheds of the first ridge of the Blue Ridge Mountains. This scenic topography also shapes the terrain of our neighboring towns and counties like Frederick and Washington County in Maryland and Loudoun County in Virginia. The shores of the Potomac and Shenandoah Rivers define the border of Harpers Ferry and are part of the Chesapeake Bay Watershed. We rely on our natural resources for clean water and clean air, not only for the health and welfare of residents, but for the economic survival of our tourism-based economy.

Our quaint, and fragile, 18th century residential village is irreplaceable. It is a designated Historic District by the U.S. Department of the Interior. We are a small town of 300 citizens, though some of our most treasured residents include wildlife that the U.S. Fish and Wildlife Service have declared endangered, threatened, rare and protected, like the Indiana Bat, Northern Long-Eared Bat, Peregrine Falcon, and actively nesting and breeding Bald Eagles.

As the eastern-most point in West Virginia, Harpers Ferry is a gateway to the state of West Virginia. We are also a Rural Gateway Community to the National Parks and other park areas that are in and adjacent to Harpers Ferry, including: Harpers Ferry National Historical Park, Chesapeake and Ohio Canal National Historical Park, Appalachian National Scenic Trail, Potomac Heritage National Scenic Trail, and the Journey Through Hallowed Ground National Heritage Area. Federal Law mandates protection of air quality in all units of the National Park system. The National Park Service is granted broad statutory authority under 54 United States Code (U.S.C.) Section 10010 et.seq. (Organic Act of 1916, as amended). NPS Natural Resources Reference Manual (RM-77) makes NO distinction in the level of air quality protection afforded to CLASS I versus CLASS II NPS units.

The Harpers Ferry Town Council is strongly opposed to the proposed Rockwool plant, identified by the West Virginia Department of Environmental Protection as a major stationary source of hazardous air pollutants. We believe the proposed Rockwool emissions and proximity of plant features and activities to our watershed are a potential threat to our air quality and public water supply, and we will protect our natural resources to the fullest extent of the law. We are committed to educating the public on our natural resources and increasing awareness of air quality health risks due to our unique topography. When asked by the Harpers Ferry representative to the Jefferson County Development Authority to provide an opinion on whether she should vote her opinion or the will of the majority of the public when casting her votes, the Town Council unanimously voted in favor of casting her votes to align with the overwhelming majority of citizens we have heard from who oppose any bonds that would support the infrastructure of the Rockwool plant.

Page Three
August 13, 2018

The Corporation of Harpers Ferry has heard the voices of outraged parents, neighbors and business owners, and joins them in their opposition to development of the Rockwool plant. We encourage neighboring municipalities and counties, local and regional organizations, state and federal stakeholders, NGOs and environment and health advocates to join us in keeping heavy industrial manufacturing out of Jefferson County, West Virginia. Please respond to us with your comments on the proposed industrial plant, questions and concerns.

Signed:

Mayor Wayne Bishop

Kevin Carden, Recorder

Town Council Members: Barbara Humes
Hardwick Johnson
Ed Wheelless
Charlotte Thompson
Midge Flynn Yost

cc: Rockwool
Jefferson County Commission
JCDA
Karan Townsend, Harpers Ferry JCDA Rep
Jefferson County Board of Education
City of Ranson
City of Charles Town
Town of Shepherdstown
Town of Bolivar

attachment

References:

WV DEP West Virginia Department of Environmental Protection online documents for the proposed Rockwool facility (ROXUL USA, INC. RAN Facility Permit #R14-0037)
<https://dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx>

Jefferson County, WV online documents regarding Rockwool
<http://www.jeffersoncountywv.org/Home/Components/News/News/170/18?backlist=%2f>

Forbes article on the proposed Rockwool – Ranson plant:
*How to Stop of Toxic Factory by Cutting Off Its Energy Supply:
When Heavy Industry Comes to Paradise*
<https://www.forbes.com/sites/davidlevine/2018/08/29/how-to-stop-a-toxic-factory-by-cutting-off-its-energy-supply/#796d69607bde>

Harpers Ferry Source Water Protection Plan
<http://www.harpersferrywv.us/water/HFSWPP.pdf>

Harpers Ferry, WV, Comprehensive Plan
<http://harpersferrywv.us/council/compplan.pdf>

Elks Run Watershed
<https://elksrunwatershed.org/resources/plans-and-reports/>

National Park Service Compendium of Orders
https://www.nps.gov/appa/learn/management/upload/APPA_Superintendents_Compndium_2018.pdf

Harpers Ferry National Historical Park
Natural Resource Condition Assessment
National Capital Region
Natural Resource Report NPS/HAFE/NRR- 2013/746
http://ian.umces.edu/pdfs/ian_report_437.pdf

National Park Service
Innovations and Impacts of Industry
<https://www.nps.gov/hafe/learn/nature/innovations-and-impacts-of-industry.htm>

National Park Service
Natural Resource Management Reference Manual #77
<https://www.nature.nps.gov/rm77/>

54 United States Code (U.S.C.) Section 10010
<https://www.law.cornell.edu/uscode/text/54/subtitle-I>

Endangered, threatened, rare and protected wildlife:
<https://www.fws.gov/endangered/>