



State of Ohio Environmental Protection Agency

Southwest District

401 East Fifth Street
Dayton, Ohio 45402-2911TELE: (937)285-6357 FAX: (937)285-6249
www.epa.state.oh.us

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March 23, 2005

Mr. William J. Taylor, Director
Ohio Field Office
Fernald Closure Project
175 Tri-County Parkway
Springdale, Ohio 45246

RE: Sewage disposal for the converted advanced waste treatment facility

Dear Mr. Taylor:

This is in response to your letter of February 14, 2005 regarding the proposed use of a holding tank to service the above named facility. In our previous meeting, we had strongly advocated the use of a conventional leaching system, if at all possible. You have reviewed the situation and are proposing to use a holding tank.

As the facilities in question are anticipated to be in place for ten years, perhaps more, we can not give much weight to the consideration that this would be a "temporary" installation. On the other hand, the described site remediation activities, which had not been brought up in previous discussions, may indeed be a factor that would support the use of a holding tank.

Specifically, it appears that all upper soil layers surrounding the structure in question will be removed for a considerable distance and depth. This would leave no native top soils in which to construct a conventional leaching system. In further discussions with Mr. Schneider of this office, we could not identify any area within several hundred feet of this structure that will not have been paved, constructed on, or significantly altered in some fashion. Those areas that appear to be "natural" are apparently now wetlands and given the excavation in the vicinity of the affected structure, drainage also seems likely to be a problem there as well. This would preclude the use of a conventional leaching system, and the use of something like a mound system would seem a risky proposition at best.

This office would therefore be willing to endorse the use of a holding tank under the following conditions:

1. Please confirm our assessment that there are (or will be) no suitable areas within the vicinity of the structure in question which could accommodate an on-site sewage system.
2. This Agency has withdrawn our Holding Tank Policy and is currently in the

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process of developing Rules to cover such situations. In this transitional period, we request that any holding tank proposal provide for the key elements in that policy and proposed rule. These elements would include:

- a. The tank should have at least ten days storage capacity and be no less than 1000 gallons in size.
- b. The tank should be equipped with a liquid level device that is connected to an autodialer and a light alarm system located in a staffed location. The alarm system shall be activated when the level of sewage or liquid industrial waste reaches seventy-five per cent of the holding tank capacity and the alarm signal shall be transmitted to a staffed location.
- c. Advance provisions should be made for the regular removal and proper disposal of the contents. This normally takes the form of a contract with a sewage hauler and an indication of which wastewater plant will be receiving and treating the waste. We require that holding tank wastes be taken to a wastewater plant and not some "alternative".

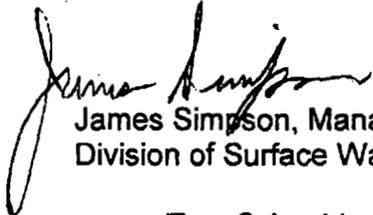
Other items for your consideration can be found in the proposed rule which can be viewed at the following Web address:

http://www.epa.state.oh.us/dsw/rules/draft_42-11_apr04.pdf

As the activities at this location are covered by provisions within the CERCLA statutes, no Permit to Install will be required. We would request that you keep us informed of your activities with regard to this project.

If you should have any questions, please feel free to contact me in this Office (937-285-6033).

Sincerely,



James Simpson, Manager
Division of Surface Water

cc: Tom Schneider, OFFO
Rick Shoemaker, DSW
Maureen Ware, DSW