

OHIO ENVIRONMENTAL HEALTH ASSOCIATION

Affiliated with the National Environmental Health Association

P.O. Box 234
Columbus, OH 43216
www.ohioeha.org



June 22, 2012

Rebecca Fugitt
Ohio Department of Health
246 North High Street
Columbus, Ohio 43215

Re: Sewage Treatment Rule Comments

Dear Ms. Fugitt,

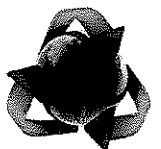
The Ohio Environmental Health Association, representing over 600 professionals in the field of environmental public health, would like to offer comments on several sewage treatment rule topics. Recommendations were vetted by our Sewage Technical Committee and approved by our Board of Directors to be forwarded to the Ohio Department of Health. Please find attached recommendations to the Ohio Department of Health regarding sewage treatment rules.

If I can answer any questions, please contact me at jwentzel@phdmc.org or (937) 225-5921 or Laura Kramer Kuns at lkuns@lcghd.org or (440) 350-2543.

Sincerely,

Jennifer Wentzel, MPH, RS
President, Ohio Environmental Health Association
C/O Public Health – Dayton & Montgomery County
117 S. Main Street
Dayton, OH 45422

6/22/2012



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OEHA Position on Sewage Treatment Rule topics as approved June 21, 2012: Vertical Separation Distance (VSD), Risk definitions and “in situ” soil

Definitions

Low to Moderate Risk conditions – Conditions as described in the soil evaluation report where there is a low to moderate risk of inadequate treatment or dispersal of sewage effluent in the soil as determined by the board of health. These conditions include: moderately well to well drained soil, or moderate to moderately rapid permeable soil, or sufficient soil depth despite seasonal saturation or other conditions determined by the board of health.

High Risk conditions – Conditions as described in the soil evaluation report where there is a high risk of inadequate treatment or dispersal of sewage effluent in the soil as determined by the board of health. These conditions include: soils that are excessively well drained or have rapid permeability and are hydraulically connected to an unconsolidated water table (unconfined) aquifer that is not protected by a restrictive layer; or where soil depth is thin and located directly over fractured bedrock; or where soils are severely eroded with loss of 75% or more topsoil; or where soils have seasonal saturation that cannot be artificially drained effectively to treat and disperse sewage effluent or other conditions as determined by the Board of Health.

In situ soil – Existing native soil that is free from any limiting or restrictive conditions, including seasonal saturation.

Seasonal saturation – soil that is impacted by seasonal saturation characterized by the presence of 5% or greater redoximorphic depletions as determined by the soil evaluation.

“In situ” soil

In situ soil shall be at least 12 inches thick; but can be reduced to no less than 6 inches when site and soil conditions are acceptable as determined by the Board of Health.

In situations with less than 6 inches of in situ soil the site can be drained to effectively lower the seasonal water table; or the effluent can be pretreated; or the effluent must be dispersed by pressure distribution; or by obtaining experimental state concurrence and granting a variance to the prior noted options with a required monitoring component.

(The last provision above regarding experimental state concurrence would allow parts of the state with high calcium carbonate levels in the soil to demonstrate and monitor the effectiveness of the elevated trench systems being used.)

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VSD

VSD for high risk conditions shall be 24 to 36 inches depending on the soil and site conditions based on a soil evaluation report as determined by the board of health; VSD shall not be reduced to less than 12 inches to fractured bedrock with the use of soil depth credits.

VSD for low to moderate risk conditions where the limitation is seasonal saturation shall be 18 inches but can be reduced to no less than 6 inches as determined by the Board of Health. VSD can be obtained by drainage to effectively lower the seasonal water table; or the effluent can be pretreated; or use of sand fill meeting mound sand specifications, or must be dispersed by pressure distribution.

Effective Date of Rule:

OEHA believes that after the final rules are approved there should be at least 6 months of intense, regionalized training with the local health districts between rule approval and the effective date.

Guidance Documents:

1. ODH should provide a soil reference guide that would summarize the results from drain mod for potential of lowering seasonal water and for levels of Calcium carbonate and how the levels would affect drainage. This document should be created to accompany the first draft of the rules.
2. ODH should provide a document (table) that would contain various system component combinations to illustrate how to achieve various depth credits to obtain the appropriate VSD required.

