

# OHIO ENVIRONMENTAL HEALTH ASSOCIATION

Affiliated with the National Environmental Health Association

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## **OEHA Sewage Technical Committee Recommendations Concerning The ODH Sewage Treatment System Rules January 17, 2013**

The Ohio Environmental Health Association would like to extend its appreciation for the opportunity to be involved in the sewage rule making process through our member participation on the Sewage Rule Advisory Committee. Our association acknowledges the time and effort put forth by the many participants and the ODH. Considering the rule making process has been a long two year process, we believe the initial comment period for the first draft of the rules ending February 8, 2013 is much too brief. The rule draft is very complex and is 95 pages long and was first released via email for comment just before (December 21, 2012) the Christmas and New Year holidays when many folks take holiday vacation time. Given the lengthy rule making process, the OEHA does not believe that it is prudent to rush the review and comment period.

- We **strongly recommend** the ODH to extend the first comment period on this first draft from January 1, 2013 to March 31, 2013. This three month period will afford sufficient time for local health districts and all interested parties to thoroughly review and comment on the rules. This extended time period will also provide time for the ODH to reconvene the Sewage RAC to obtain their comments on the rules. We believe that by extending this initial comment period, it will make the following official 60 day comment period and other reviews/approvals a much smoother process.
- Extending the initial comment period will obviously delay the effective date of the rules. We **strongly recommend** that the effective date of the rules to be January 1, 2014. This will allow local health districts to conduct the outreach and training **necessary** to enable a successful implementation process. While there are several reasons why it is more logical for an effective date of January 1, 2014; one obvious issue is that the current registrations for the installers, service providers and septage haulers expire at the end of the year in the health districts requiring registration. Current bonds and insurance provisions may not necessarily conform to those proposed in the rules and the current bonds do not involve the ODH.

We respectfully request the ODH to take these comments into consideration and extend the comment period and notify all interested parties of the change. Please feel free to contact Laura Kramer Kuns at 440-350-2543, if further follow up is needed.

