

The City of Springfield Ohio

Office of the City Manager

April 17, 2013

The Honorable John A. Boehner
United States House of Representatives
Ohio's 8th Congressional District
H-232 The Capitol
Washington, DC 20515

Dear Representative Boehner:

I am writing in regard to the Tremont City Barrel Fill and its potential impact on the water supply for the City of Springfield and Clark County. The City provides water to approximately 82,000 customers including our commercial & industrial users. While there does not appear to be an immediate impact on our water supply, the long-term implications and risks are significant. I have supplied your staff with summary documentation to bring them up to speed on this important issue. We are seeking your help in applying pressure to the US EPA to reinstitute Alternate 4a, which would result in clean up of the Barrel Fill site.

The short history is as follows. In the late 1970s, hazardous material was placed in barrels at the Tremont City landfill. As more barrels were brought in, a specific site was identified for future barrels and subsequent hazardous waste was placed in this Barrel Fill. The material has been identified as hazardous and sits on top of the underground aquifer that supplies water to the city.

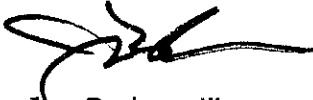
Local organizations and officials, including the Ohio EPA, have recommended that the site be cleared of all hazardous material. A public process was conducted. At the very last minute, a new solution, Alternate 9a, was identified by Waste Management. Against all other advice, including the Ohio EPA, US EPA accepted and recommended the solution. Under 9a, which is an untested and unproven process, cleanup would involve digging up the barrels, crushing them, and removing only the liquid hazardous material would be accomplished. The barrels with any remaining solid material will be placed back in the site after lining it. Our community does not believe this to be an adequate solution since the potential ramifications are so significant. Water contamination from hazardous materials could literally destroy our existing business and commerce, as well as our community.

US EPA is now threatening to divide the site into three separate distinct areas, those being the original landfill, the Barrel Fill, and a transfer station. By separating the sites, my fear is they will claim that the site no longer qualifies as a Superfund site. This is

very alarming and seems to be proffered as a veiled threat for a community to accept 9a or risk having no cleanup at all.

Please help us to remedy this extremely critical situation. Solution 4a should be placed back under consideration and is the only logical, safe cleanup alternative.

Sincerely,




Jim Bodenmiller
City Manager

pc: Springfield City Commission
Clark County Commissioners
Charles Patterson, Health Commissioner
German Township Trustees
CF/WATER

Zimbra**jbodenmiller@ci.springfield.oh.us**

Tremont Barrel Fill info

From : Charles Patterson <cpatterson@ccchd.com> Tue, Apr 16, 2013 05:25 PM
Subject : Tremont Barrel Fill info  1 attachment
To : jbodenmiller@ci.springfield.oh.us

Jim-

Here is the Record of Decision (ROD) put out by the US EPA, Region V in Chicago regarding the Tremont Barrel Fill http://www.ccchd.com/pdfs/TCBF_ROD_final.pdf. The decision is to support Alternate 9a which was NOT supported by any local officials or by the Ohio EPA. This obviously makes it more difficult to overturn the decision, but we hope together we can still make a positive impact on the situation.

All of the relevant local jurisdictions were in support of Alternate 4a which was originally proposed by the Region V staff in June 2010. The German Township Trustees, the Clark County Commission, the Springfield City Commission and the Clark County Board of Health all agreed with the Ohio EPA's stance of rejecting Alternate 9a and accepting Alternate 4a.

Our staff is available at any time to brief you or your staff on this matter from the local government point of view. Thank you for your time on this important matter for the citizens of Clark County and the City of Springfield. Please do not hesitate to contact me at any time.

 **Tremont Barrel Fill Site History and Overview, Speaker.doc**
50 KB

**Report to Speaker John Boehner
on the Clark County Combined
Health District's Concerns about
the Lack of Protectiveness
exhibited by US EPA's selected
Remedial Alternative 9A for the
Tremont City Barrel Fill Site**

April 2013

Tremont City Barrel Fill site history and overview:

"About the Tremont City Barrel Fill site

"The Tremont City Barrel Fill Site is located at 3108 Snyder-Domer Road, about 1.5 miles west of Tremont City, Ohio and about 3.5 miles northwest of Springfield, Ohio (Figure 1). The Site occupies 8.5 acres and is located on the northwest end of the larger, 80-acre property that also includes the Tremont City Landfill Site and the Tremont City Waste Transfer Facility Site (Figure 2). An intermittent surface water body, called the unnamed tributary, lies northeast and east of the Barrel Fill. The Site is not on U.S. EPA's National Priorities List (NPL), but is being addressed under U.S. EPA Region 5's Superfund Alternative Approach Program. A site is eligible for this program if site contaminants are significant enough that the site would be eligible for listing on the NPL, a long-term response action is expected at the site, and there is a willing, capable potentially responsible party (PRP) that will negotiate and sign an agreement with U.S. EPA to perform the investigation or cleanup. PRPs are those entities that are potentially responsible for contributing to contamination at a site. In 1976, Ohio EPA issued a permit allowing the Barrel Fill to be used for the disposal of various solid wastes and chemical sludges. From 1976 to 1979, approximately 51,500 drums and 300,000 gallons of industrial waste were disposed of in 50 unlined waste cells dug approximately 15-20 feet into native soil. Drums were placed in layers in each of the cells. Wastes disposed of in the cells included glues; resins; still bottoms; paint sludge; paint scrap and waste; soap, shampoo, and detergent waste; asbestos slurry; oil sludges; and other compounds. During 1979 and 1980, land application and shallow injection of liquid, biodegradable wastes (margarine, corn syrup, and other similar wastes) from food industry sources occurred next to the Barrel Fill. After all Barrel Fill disposal operations ceased at the end of 1979, a soil cover 3-4 feet thick was placed over the Barrel Fill. Additional cover was added during the 1980s to address settlement issues, resulting in the current soil cover, which is 10-17 feet thick over the waste cells. U.S. EPA began an initial assessment of conditions at the Barrel Fill in 1997 in response to concerns raised by the Citizens for Wise Approaches Toward Environmental Resources (CF/WATER), which is now a local community advisory group (CAG), U.S. Representative David Hobson, and U.S. Senator Michael Dewine. In consultation with CF/WATER, Ohio EPA, and the owner/operator of the Barrel Fill, U.S. EPA planned and conducted three phases of field investigation which resulted in U.S. EPA's March 2002 Site Investigation Summary Report. The report concluded that releases had occurred at the Barrel Fill, and that conditions warranted further investigation. In 2002, U.S. EPA negotiated a legal agreement called an Administrative Order by Consent with the PRPs, requiring the PRPs to perform a Remedial Investigation and Feasibility Study (RI/FS) at the Tremont City Barrel Fill Site and to reimburse U.S. EPA for costs to oversee the RI/FS. The RI was conducted to determine the nature and extent of contamination and to assess current and potential future risk the contamination may pose to human health and the environment. The FS evaluates cleanup

alternatives based on evaluation criteria established in the National Contingency Plan (NCP), the federal rules governing U.S. EPA's Superfund program.

"In November 2006, U.S. EPA approved the RI Report. The report showed that, although the buried drums were corroding, they were still largely intact and had not, for the most part, released their contents. The RI Report also reported elevated levels of contaminants within the Barrel Fill; however, it identified very limited release of contaminants to the surrounding groundwater. See Site Pollution and Summary of Site Risks section below. In November 2008, U.S. EPA, in consultation with Ohio EPA, issued an approval with modifications letter for the July 2008 FS. In January 2009, the PRPs submitted an FS Addendum that included variations of the excavation cleanup alternatives and an additional containment cleanup alternative. U.S. EPA issued an approval with modifications letter in February 2010 for an April 2009 revised FS Addendum. In June 2010, U.S. EPA issued a Proposed Plan to the public for U.S. EPA's preferred remedial action for the Tremont Barrel Fill Site at that time, Alternative 4a. Alternative 4a includes complete excavation and off-site disposal of all liquids and solid hazardous wastes; and on-site consolidation of remaining non-hazardous solid wastes and contaminated soils in an engineered solid waste cell. The extended public comment period for proposed Alternative 4a ran from June 10, 2010 through August 11, 2010. Chemical Waste Management (CWM), a PRP, commented, submitting new information on two additional remedial alternatives for consideration by U.S. EPA. U.S. EPA reviewed and evaluated the information and subsequently developed Alternative 9a. A description and evaluation of Alternative 9a can be found in U.S. EPA's May 2011, FSA 2. In this Proposed Plan, U.S. EPA is evaluating Alternatives 4a and 9a against seven of the nine criteria required by CERCLA, the Superfund Law. The remaining two criteria will be evaluated following the comment period for this Proposed Plan". [Excerpted from Reference File 1]

In the Feasibility Study Addendum No.2 [Reference File 2] US EPA Region 5 (the Region) has selected a new Remedial Alternative 9A (Alternative 9A). Briefly, Alternative 9A proposes to:

- 1) remove all drummed liquid wastes for offsite disposal in an appropriate, permitted facility;
- 2) reburied ON SITE all solid wastes – HAZARDOUS and non hazardous – in a consolidation cell which **does not** meet current Ohio EPA protectiveness criteria for a hazardous waste land disposal facility;
- 3) potentially treat, solely by adding a stabilizing agent, any non drummed liquid waste (**hazardous** or not) found on site and then rebury it in the consolidation cell.

Note: the stabilizing agent does nothing to make potentially hazardous liquid wastes less hazardous; its only purpose is to make the liquid thick enough to pass a liquidity test in the field so it may then be classified as a non-liquid and remain on site. This will result in Principal Threat Wastes remaining on site and providing a continuing threat to the groundwater.

As noted in the site history and overview above, the Remedial Alternative previously compromised upon was Alternative 4A, which proposes to:

- 1) remove ALL liquid waste for offsite disposal in an appropriate, permitted facility;
- 2) remove all hazardous solid waste for offsite disposal in an appropriate, permitted facility;
- 3) rebury the remaining non hazardous solid waste onsite in an unlined consolidation cell.

This Health District would still prefer Remedial Alternative 4B which is virtually identical to Alternative 4A with the exception that the consolidation cell would be LINED to make it more protective of the groundwater below the site that is part of the regional sole source aquifer system and the drinking water supply for much of the county (and surrounding area) [Please see Reference File 3 for a map of the Sole Source Aquifer and the approximate location of the barrel fill].

Alternative 4A was the compromise accepted by the stakeholders in 2010 in large part because it removed ALL of the hazardous waste from the site. The German Township Trustees and the Clark County Commissioners have passed resolutions to that effect. [Reference File 4]

The Area of Contamination (AOC) policy use at this site:

Part of the Region's proposed Alternative 9A approach is the employ an "Area of Contamination" (AOC) policy to avoid complying with Resource Conservation and Recovery Act (RCRA) land disposal restrictions. AOCs are defined in US EPA Directive 9347.3- 05FS from July 1989 as being "delineated by the areal extent (or boundary) of contiguous contamination. Such contamination must be continuous, but may contain varying types and concentrations of hazardous substances" [Page 5, Reference File 5]. In March of 1996 the US EPA further discussed the concept of placement of waste within an Area of Contamination and when that placement would trigger RCRA land disposal restrictions by noting, "placement does not occur when waste is consolidated within an AOC, when it is treated in situ, or when it is left in place. Placement does occur, and additional RCRA requirements may be triggered, when wastes are moved from one AOC to another (e.g., for consolidation) or when waste is actively managed (e.g., treated *ex situ*) within or outside the AOC and returned to the land" [Page 1, Reference File 5]. The National Remedy Review Board expressed concern with the application of the Area of Contamination Policy in their recommendations memorandum of March 31, 2011 [Reference File 6].

This Health District believes that the AOC guidance document [Reference File 5] clearly states that EX SITU treatment of waste will trigger the RCRA Land Disposal Requirements, specifically the minimum technology requirement of a DOUBLE liner and leachate collection system. This

Health District further believes that the proposed *ex situ treatment* of the non drummed liquid wastes by 1) pumping them to the surface with a high capacity trash pump; and 2) treating them with a stabilizing agent to make them viscous enough to 'pass' as a solid and remain onsite for disposal; should trigger the RCRA Land Disposal Restrictions (specifically the minimum technology requirement of a double liner and leachate collection system) if stakeholders are forced to accept Alternative 9A. This Health District would still prefer Remedial Alternative 4B as the best balance of the remedy selection criteria.

This Health District has further concerns about the ability of anyone to physically perform all of the activities described in Alternative 9A within the confines of the AOC boundary. The planned removal, treatment, and stockpiling activities in Alternative 9A will require large amounts of space and will occur at the same time as the construction of the consolidation cell within the AOC boundary. We cannot effectively evaluate Alternative 9A's safety and protectiveness during the removal activities and construction of the consolidation cell without a clear understanding of the proposed AOC's boundary and the layout of the associated support structures, surfaces, and areas. This Health District is of the opinion that proposed Alternative 9A is being given undue consideration as a valid remedial alternative when it does not provide sufficient detail for its evaluation.

The costs estimates provided for Alternative 9A appear to be miscalculated or deficient:

A recurring issue with the cost estimates provided with the remedial alternatives documents is the uncertainty associated with those costs.

First, the costs for alternatives proposing off-site treatment and disposal of hazardous wastes have been consistently portrayed as exorbitantly expensive at ~\$50-60 million [Reference File 2]. But, in 2007, the Ohio EPA indicated that the "cost for the waste treatment alternatives is inflated" and provided a list of "actual costs" for a complete "off-site treatment and disposal of 41,300 drums at the Valleycrest Landfill" in Montgomery County under "far worse conditions than exist at the Barrel Fill" at less than \$21 million. These real costs from a real cleanup, as provided by the Ohio EPA, do not appear to have been given merit by the US EPA in their consideration of options for the Barrel Fill.

Second, the cost for Alternative 9A appears to be underestimated. In May 2011, CH2M Hill listed the cost for Alternative 9A at ~\$28 million. In calculating this number (and contrary to Ohio EPA financial assurance guidelines), CH2M Hill included entries for "net present worth of O & M cost," "net present worth of groundwater monitoring," and "net present worth of total cost" in the cost estimate for Alternative 9A, anticipating an unrealistic 30-year performance at 7% interest per year and artificially underestimating the up-front cost for the alternative. In addition, the cost

estimate provided for Alternative 9A did not include costs for facility care beyond thirty years even though an extended work period is expected [Reference File 2]. Finally, in 2007, the Ohio EPA pointed out that, if Applicable and Relevant and Appropriate Requirements (ARARs) were calculated into the costs of Alternative 9A (as they should), "the cost of Alternative 9A would increase substantially" [Reference File 10].

Third, multiple costs for Alternative 4A appear in the literature. In May 2011, CH2M Hill listed the cost for Alternative 4A at ~\$57 million [Reference File 2], despite a February 15, 2011 Ohio EPA revision of the cost estimate for Alternative 4A from ~\$53 million to ~\$45 million [Reference File 11].

The understanding of how water and contaminants move through the ground at this site has fundamentally changed over the life of the project, yet early, incorrect, assumptions are being used to justify the selection of Alternative 9A:

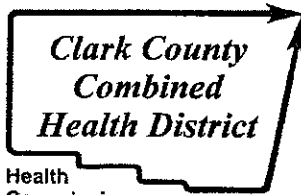
There has been significant concern on the part of many stakeholders (including the Ohio EPA) about the characterization of the subsurface geology at this site. Specifically about the ability of the tills under the site to transport contamination vertically down into the regional sole source aquifer. There has been a significant effort on the part of Ohio EPA to accurately represent the site boring logs in a coherent and spatially relevant manner which to date has been ignored by US EPA Region 5 [Reference Folder 7, Please Contact Mark Allen of Ohio EPA's Southwest District Office (937) 285-6357 for further details or clarification regarding the files contained in Reference Folder 7]. The Ohio EPA also expressed concern with the adequacy of the Remedial Investigation (RI) Report and the ability to meaningfully review the proposed alternatives in the Feasibility Study with out a good understanding of how the site works. The US EPA Region 5 responded in a letter dated February 8, 2008 [Reference File 8]. One of the responses was to have a US Geological Survey hydrogeologist, Bob Kay, review the RI Reports hydrogeological characterization. In August of 2007 Mr. Kay challenged the highly impermeable hydrogeologic model presented in the RI Report and concluded, contrary to a conclusion in the RI Report, that vertical contaminant migration from the Barrel Fill to the lower groundwater units was likely [page 1, Reference File 8]. The Region then goes on to state that the Remedial Alternatives will all be evaluated using the conservative assumption that the till units below the Barrel Fill are not as impermeable as the RI Report indicates. It also acknowledges that the current low-level groundwater contamination found at the site is attributable to the Barrel Fill [page 2, Reference File 8]. This Health District is gravely concerned that that Alternative 9A was **NOT** evaluated using the conservative assumption that the till below the site is not as impermeable as the RI Report concludes. In fact, in the Region's response to the National Remedy Review Board's

recommendations from 2011 they cite the "very low hydraulic conductivity of the underlying till" as one way in which they believe Alternative 9A does comply with RCRA requirements [Page 3, Reference File 6]. In addition to the US Geological Survey's review which showed that the till had vertical permeability and therefore would likely transport contaminants into the regional aquifer, the Ohio Environmental Reviews and Appeals Commission (Ohio ERAC) found in 1998 that this same area was unsuitable for siting a *Sanitary* Landfill [Reference File 9]. This Health District has serious concerns about the protectiveness of siting a substandard hazardous waste cell in virtually the same location where it was not possible to site a sanitary landfill and remain protective of the groundwater.

The Region also claims that Alternative 9A complies with the RCRA minimum technology requirement of a double liner and leachate collection system [Page 3, Reference File 6]. Figure 2 in Reference File 2 is the conceptual cross-section of proposed Alternative 9A on which this Health District can find no mention of a second liner; nor, is there any mention of it in the narrative.

In Conclusion:

This Health District appreciates your attention to this serious issue which has been a concern for the citizens of Clark County for more that 15 years. It is important at this critical moment in the decision making process to select the right remedial alternative to protect the future health and safety of the citizens and the groundwater of the region. It is the sincere hope of this Health District that, with your assistance and intervention, the Region can be prevented from approving a substandard, un-protective, single-lined hazardous waste consolidation cell in vertically interconnected till over a sole source drinking water aquifer as an appropriate and protective remedy for this site.



Health Commissioner
Charles A. Patterson, RS, MBA

November 2, 2012

Clark County Combined Health District

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2430 Van Buren Avenue
Springfield, OH 45505

Dear Mr. President:

Thank you for visiting our wonderful city! Our most valuable natural resource in Springfield is our groundwater supply. We have one of the best quality aquifers in the country that supplies the drinking water to over 80,000 citizens in Springfield and Clark County. Protecting this invaluable resource is incredibly important to our future economic viability and to our citizens' health. We are concerned about the **lack of due process** in the ongoing Superfund proceedings at the Tremont Barrel Fill site in Clark County, Ohio. We implore your help and guidance in this critical groundwater quality issue.

Background

The Tremont Barrel Fill site is an 8.5-acre section at the north end of the Tremont City Landfill. From 1976 to 1979 about 51,500 drums and 300,000 gallons of industrial waste were disposed of in unlined pits. It is currently estimated that **1.5 million gallons of hazardous waste** reside at this site which is located above a federally designated sole source drinking water aquifer. The site is classified by the United States Environmental Protection Agency (U.S. EPA) as a Superfund Alternative Site. This designation led to a Remedial Investigation and a Feasibility Study informing the U.S. EPA Region 5 in the cleanup of the site.

Issue of Concern

The original cleanup plan, Alternative 4a, was chosen by the U.S. EPA Region 5 after consultation with the National Remedy Review Board (NRRB). This plan was presented by Region 5 in the summer of 2010. Alternative 4a proposed to remove all of the hazardous wastes from the site. The Ohio EPA and all of the local governmental jurisdictions agreed to the plan.

On the last day of the extended public comment period, one Potentially Responsible Party (PRP) who had not participated in the previous ten (10) years of the process submitted a new Alternative 9a. Alternative 9a excavates all of the wastes but only removes the liquids off site. Solid wastes, including untreated solid hazardous wastes are proposed to be re-disposed at the site, requiring costly ongoing monitoring to occur for many generations. The local elected officials, local public health department and the Ohio EPA are against Alternative 9a for a variety of technical reasons including deficiencies in the Remedial Investigation report, the Feasibility Study, and the current selected remedy. These deficiencies were pointed out by the Ohio EPA and have not been addressed.

There were public comment periods after both community involvement meetings. The due process issue occurred when changes to Alternative 9a were explained only in the Responsiveness Summary *after* the public comment period was closed. In addition, the U.S. EPA Region 5 cites a 2002 report to support the new alternative but does not use the parts of the same report that clearly refute the potential effectiveness of the alternative. The information not considered in the 2002 U.S. EPA report places the security of the containment proposed in Alternative 9a in question.

Request for Consideration

We feel it is imperative for U.S. EPA officials in Washington to examine this situation as we do not believe that referring it back to Region 5 will cause any corrections to occur. Local public health officials and Ohio EPA officials stand ready to provide any additional information necessary to correct the deficiencies, clarify the record and ensure that the long term solution to this unfortunate situation is properly implemented.

Thank you for your attention to this very important health and safety issue for our community.

Sincerely,


Charles A. Patterson, R.S., MBA
Health Commissioner

cc: City Commission of Springfield, Ohio
Board of Commissioners, Clark County Ohio
German Township Trustees

The mission of the Clark County Combined Health District is to protect and improve the health of the community through the
• Promotion of Wellness • Prevention of Injury • Prevention of Disease

Waste's disposal at issue

Waste

continued from A1

Resources, known as CF/WATER, decided to disband.

"We can't figure out what this sampling means and this delay," said Marilyn Welker, the group's president.

The U.S. EPA didn't return multiple phone calls

from the Springfield News-Sun seeking comment.

According to an email obtained by the News-Sun, Region 5 told the group's members they are "sampling to evaluate current conditions" at the site and may use the data "to assess" whether the site will be considered for the National Priorities List, which is commonly referred to as the Superfund program.

The U.S. EPA's website describes the NPL as "a list of national priorities among the known releases or threatened releases of hazardous substances, pollutants, or contaminants."

CLARK COUNTY

Hazardous waste site to get EPA testing

Residents concerned with what sampling means for barrels.

By Michael Cooper
Staff Writer

SPRINGFIELD — The U.S. Environmental Protection Agency will conduct tests at a Tremont City site containing buried barrels filled with 1.5 million gallons of hazardous waste.

The U.S. EPA Region 5 office will sample surface water, soil and sediment in and around the Tremont City Barrel Fill Superfund Alternative Site this month.

The decision has a local water protection group worried the site's status could change after local officials and health groups have fought for decades to have it cleaned up.

People for Safe Water, a new group determined to fight the U.S. EPA's plans to remediate

nants throughout the United States and its territories." The list guides the EPA in determining which sites warrant further investigation.

Clark County Health Commissioner Charles Patterson is also unclear on what the new testing means for the site, but he knows the battle must continue to preserve water for future generations.

"We're trying to prevent a problem 50 to 100 years from now," Patterson said.

Area politicians and health leaders have been fighting for years to have the barrel fill — an 8.5-acre section of a closed landfill for industrial waste barrels that sits near the area's drinking water aquifer — remediated.

Last June, the U.S. EPA announced it was preparing a negotiation package for the U.S. Department of Justice, which serves as the representative for potentially responsible parties that might have contributed to the barrel fill. The U.S. EPA will send notice to potentially responsible parties on the cleanup plans and why it believes they're liable.

According to the most recent update to the U.S. EPA's barrel fill website, the negotiating process is still ongoing.

People for Safe Water and community leaders believe that if left in its current state, the site could be a hazard to public health. Rainwater draining through the unlined barrel fill and containment pools could

eventually contaminate the area's sole source aquifer, which serves 85,000 customers in Clark and Montgomery counties, according to U.S. EPA records.

In September 2011, the U.S. EPA released its plan to dig up the barrels and then rebury them on site in a lined landfill, rather than removing all of the waste as recommended by the Ohio EPA and civic leaders.

The U.S. EPA plan's estimated cost is \$28 million; the estimated cost of the more extensive clean-up plan, Alternative 4a, is \$56 million.

Local leaders and environmental groups have been fighting to have the more extensive plan restored.

"The plan has been proposed; it was acceptable," Welker said. "We want that plan."

Welker said EPA officials told her in an email that the upcoming sampling is part of the initial Hazardous Ranking System scoring for the site, but it wouldn't release the rankings of sites being assessed for proposal as a Superfund site.

"Our first thought was, OK, more delays, which is OK," Welker said. "But the second one is, 'What's going on behind the scenes that they won't tell us?'"

Who's challenging this plan? "Our concern is that this sampling that is to be done this month still does not reach into the (sand and gravel or carbonate) aquifer. It's still a

superficial sampling."

Extremely low levels of contaminants have been found in aquifers beneath the site, according to U.S. EPA records, but can't be traced back to the barrels and aren't considered harmful to public health. Safe Water members, however, believe the barrels are dangerous to the aquifers beneath the site.

The group has asked for letters of support from both Speaker of the House John Boehner and U.S. Sen. Sherrod Brown. Ohio Rep. Bob Hackett and Ohio Sen. Chris Widener both have said they'd sign a letter of support.

They also plan to send questions to the U.S. EPA. "We need to shake the tree higher up," Welker said.

Area political and health leaders delivered a letter to President Barack Obama's aides during his stop here Nov. 2 in an attempt to reverse the decision on how to clean up the site. It states area leaders are concerned about the "lack of due process in the ongoing Superfund proceedings" and implores the president's help and guidance.

They are still waiting for a response, and plan to meet to discuss the next

In-depth coverage

The Springfield News-Sun has provided unmatched coverage of the Tremont City barrel fill, digging into the U.S. EPA clean-up plans, looking at local residents' concerns about the possible effect on their drinking water and examining the cost of remediating the hazardous waste.

steps this week. The environmental group also plans to attend Springfield City Commission meetings, beginning today.

"We want to support the city and raise the importance of this issue," Welker said.

CF/WATER, which at one time had as many as 500 members, helped stop the construction of another landfill in the same area in 1999, raising \$800,000 for the cause.

However, Chairman Jeff Briner said, membership has waned in recent years, and they plan to disband the group later this year.

Briner said he's "disgusted" with the clean-up process.

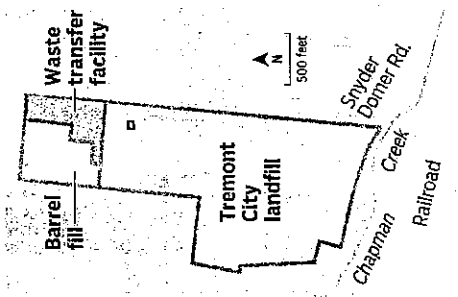
"It was settled in 2010," Briner said. "They need to finish it and do what needs to be done."

Patterson credited CF/WATER for its efforts, and said it's important for another group like PFSW to continue the fight.

"Citizens groups carry a lot of weight (with the U.S. EPA)," Patterson said. "Anyone interested in joining People for Safe Water can email PFSWater@gmail.com."

Contact this reporter at 937-328-0365 or email Michael Cooper at coxinc.com.

Springfield News Sun
April 16, 2013



LINDA SCOTT/STAFF

the barrel fill, began meeting last May after a previous group, Citizens for Wise Action Toward Environmental

Waste continued on A2

US EPA and the Tremont City Barrel Fill Site

REMARKS TO SPRINGFIELD CITY COMMISSIONERS - APRIL 16, 2013

PROBLEM: The sole source aquifer for 85,000 people, primarily Clark County citizens, is at risk of contamination by chemical poisons from the Tremont City Barrel Fill Site, a Superfund Alternative Site in northern Clark County. *Charles Patterson, Clark County Health Commissioner, reports that trace contaminants are already showing up in monitoring wells below the site.* US EPA's original plan (June 2010), acceptable to all pertinent parties, would have adequately addressed the site's cleanup. US EPA's adoption of a subsequent plan (June 2011) threatens the water supply upon which the people and economy of the entire region depend.

ACTION NEEDED: The US EPA must return to the original Plan 4a. This plan will ensure the sole source aquifer's continuing yield of high quality pure water for Clark County residents.

BACKGROUND: The Barrel Fill site contains 51,500 55-gallon drums of chemical waste in German Township, deposited there in the late 1970's.

- Following legislative procedures and public processes, US EPA's Region 5 Superfund Division issued a site clean-up plan known as Alternative 4a in June 2010. *This plan was acceptable to all local and OH EPA officials.*
- Subsequently, US EPA issued another plan, known as Alternative 9a, on June 22, 2011, as the final clean-up plan. *This plan was unacceptable to all local and OH EPA officials.*
- *The OH EPA, Clark County Combined Health District, Clark County Commissioners, Springfield City Commissioners, German Township Trustees, and our citizens group, People for Safe Water, all vigorously oppose Plan 9a because, if implemented, it will so compromise the purity of the sole source aquifer for Clark County.*
- The corporations responsible for clean-up costs, or Potentially Responsible Parties (PRPs), sued Chemical Waste Management (CWM), who had challenged its status as one of the PRPs. The court ruled that CWM is a PRP and is responsible for 55% of the cleanup costs

Key points of opposition to Plan 9A:

- It lacks the level of protection provided by Alternative 4a.
- It leaves untreated hazardous waste at the Barrel Fill site.
- It redefines principal threat waste to be only liquid waste.
- It ignores key unique geological features with serious consequences for the Springfield well fields and Mad River Aquifer.

CONTACT INFO FOR PEOPLE FOR SAFE WATER:

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