



Health
Commissioner

Charles A. Patterson, RS, MBA

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November 2, 2012

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