

Board of Clark County Commissioners

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May 21, 2013

Dear Representative Boehner:

We need your help in protecting our most valuable natural resource in Springfield and Clark County: our groundwater supply. We have one of the best quality aquifers in the country that supplies the drinking water to over 82,000 citizens in Springfield and Clark County. Protecting this invaluable resource is incredibly important to our future economic viability and to our citizens' health and well-being. 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. We have not received assistance from the executive branch of government to date and request your intervention at this time.

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 and only allowed non-hazardous waste be re-disposed at the site. The Ohio EPA and all of the local governmental jurisdiction signees 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. The process as identified by Waste Management included digging up all of the barrels, crushing them to remove the liquids, transporting the liquid wastes off site and reburying the remaining wastes. 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 re-disposal of the solid hazardous wastes does not meet the current requirements for the landfilling of hazardous wastes. These processes as described are not only illegal, but also untested and unproven. 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 are yet to be adequately addressed by Region 5.

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 Assistance

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,

Richard L. Lohnes, President
Board of Clark County Commissioners

Dan Young, President
Board of Health
Clark County Combined Health District

Charles Metzger, President
Board of German Township Trustees

Marilyn Welker, President
People for Safe Water

Warren Copeland, Mayor
Springfield City Commission