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Indiana State Department of Health

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June 4, 1992

To: Local Health Departments

From: Alan M. Dunn, R.P.S., Chief ^{AND}
Residential Sewage Disposal Section
Division of Sanitary Engineering

Subject: Temporary Sewage Holding Tank Approvals
Rule 410 IAC 6-8.1-31(e)
Residential Sewage Disposal Systems

This office has received numerous questions about the provisions of our residential sewage disposal rule pertinent to the approval of temporary sewage holding tanks for residential sewage disposal.

Under the provisions of Rule 410 IAC 6-8.1-31(e), the installation and use of a holding tank requires the written approval of the Commissioner of the State Department of Health. This applies to the use of holding tanks for proposed and existing residences.

In order to obtain written approval, one of the following conditions must be met:

1. That the residence will be connected to a sanitary sewer within one year. This must be certified, in writing, by the sewer utility and accompanied by a written request from the local health department for permission to issue a permit for a holding tank. The certification by the sewer utility must be sufficient to show that the sewer will be available, such as the acceptance of a bid from a construction company for sewer construction. Preliminary planning for sewer construction will not suffice, as such planning is too frequently delayed or abandoned.
2. That an on-site sewage disposal system will be constructed, in accordance with the provisions of Rule 410 IAC 6-8.1-33(a), within one year. This must be certified, in writing, by a representative of the local health department and accompanied by a copy of the permit for the on-site sewage disposal system and a written request for permission to issue a permit for a holding tank. This provision does not apply to those circumstances covered by my memorandum of

December 19, 1992, to local health departments, concerning the construction of soil absorption systems under wet soil conditions.

3. That the holding tank will be owned and operated temporarily by a conservancy district, sewer district, private utility, or municipality as a part of its sewage disposal plan or for no more than one year while connection to a sanitary sewer is being secured. This must be certified, in writing, by the district, utility, or municipality which will own and operate the holding tank and accompanied by a written request from the local health department for permission to issue a permit for a holding tank. In addition, the use of holding tanks will not be permitted in lieu of the construction of collection sewers and central treatment where such construction should be undertaken. The certification by the district, utility, or municipality must be sufficient to show that the progress on sewer project will result in the availability of sanitary sewers to replace the holding tanks. Preliminary planning for a sewer project will not suffice, as such planning is too frequently delayed or abandoned.

If one of the three conditions outlined can be met, the written request for approval of issuance of a holding tank permit should be addressed to:

Alan M. Dunn, Chief
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The reason for these requirements is the exorbitant costs of the maintenance of a holding tank. The Environmental Protection Agency's Design Manual, *On-Site Wastewater Treatment and Disposal Systems*, states that flows from a typical residence will be in a range of 45 to 60 gallons/capita/day (gcd), but indicates that flows may exceed 80 gcd. This same manual recommends a daily design flow of 75 gcd, and 150 gallons/bedroom/day, in order to provide adequate sewage disposal facilities for the vast majority of homes. A person living alone would therefore be expected to generate wastewater within the range of 1,350 (45 gcd) to 2,250 (75 gcd) gallons per month. A typical family of four may generate 5,400 to 9,000 gallons per month.

If additional people were to live in the household, the wastewater generated would increase in direct proportion to the number of people in residence. With pumping costs of \$60 to \$75 per thousand gallons, a family of four would be paying from \$324 to \$675 per month for sewage disposal at a residence. That translates to \$3,888 to \$8,100 per year for appropriate and legal sewage disposal if a holding tank is used.

Another consideration is that Wastewater Management Rule 320 IAC 8-5 prohibits land application as a means of disposal of holding tank waste without prior treatment. Holding tank waste is, therefore, commonly transported to a wastewater treatment plant for disposal. Wastewater haulers may not dispose of wastewater at treatment plants if municipalities prohibit such disposal. This substantially increases the cost of pumping over that estimated above, and this additional cost will also be passed on to the homeowner.

Due to the high cost associated with holding tanks and the impracticality and expense of transporting the wastewater for disposal to a facility which will accept it, the homeowner will be soon tempted to let the tank overflow. If discharges from holding tanks do occur it will be the responsibility of the Health Officer, under IC 16-1-4-11, to require the elimination of those discharges, even if the homeowner claims he is financially unable to do so.

It would not be appropriate, in our opinion, to approve the use of holding tanks, given the temptation to dispose of the wastewater from the tanks improperly or illegally because of economic pressures. Rather than being faced with repetitive orders to homeowners to dispose of the wastewater properly and legally, or the possible declaration of a residence unfit for human habitation, an appropriately sized and designed on-site sewage disposal system or a connection to a sanitary sewer must be required.

If you have any questions, please call me at AC (317) 633-0160.

cc: Barbara J. Wilder, M.B.A.
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