



MEMORANDUM

TO: Health District Environmental Health Directors
Health District Environmental Health Supervisors
Health District Environmental Health Program Managers
DEQ Wastewater Program Staff – State Office
DEQ Regional Office Administrators
DEQ Regional Office Engineering Managers

FROM: DEQ Wastewater Compliance Bureau

DATE: August 12, 2025

SUBJECT: Use of Wastewater Holding Tanks

This memorandum revises and supersedes previous versions of the Use of Holding Tanks memorandum dated July 13, 1981, and clarifies the use of wastewater holding tanks as an Alternative System for on-site wastewater storage and disposal.

IDAPA 58.01.03.003 defines an Alternative System—“Any system other than a standard system for which the Department has issued design guidelines or the Director determines is a modification of a standard system.”

IDAPA 58.01.03.004.10 describes an Alternative System—“If a standard system as described in these rules cannot be installed on a parcel of land, an alternative system may be permitted if that system is installed in accordance with the TGC’s recommendations and is approved by the Director as stated in Section 009.”

A wastewater holding tank meets the definition of an Alternative System; however, the ability of wastewater holding tanks to function properly is limited and short term, often measured in days, and maintenance depends upon the initiative of the individual owning the systems. Proper disposal of the accumulated wastewater (i.e., pump and haul) depends upon the availability and use of approved disposal sites and licensed septic tank pumpers.

Due to the limited reliability of wastewater holding tanks, DEQ will not approve the installation of a wastewater holding tank unless one or more of the following apply:

- The immediate use of a wastewater holding tank is necessary to protect the environment and public health while an approved long-term wastewater disposal solution is pursued.
 - Additional approval conditions for Emergency Holding Tanks are detailed in the Idaho Technical Guidance Manual (TGM) Section 4.
 - Delayed construction of an on-site subsurface disposal system is not an acceptable reason to allow a temporary holding tank.

- The local sewer authority provides written confirmation to DEQ that sewer services will be available to the subject property within six months of the date of the wastewater holding tank's installation, and the applicant demonstrates to DEQ that the use of portable sanitation units during that time would be impractical or unreasonable.
- The TGM details design and approval conditions for alternative wastewater disposal systems that incorporate a wastewater holding tank, including but not limited to:
 - Floating Vault Toilets and Boat or Vessel Sewage Disposal
 - Portable Sanitation Units
 - Recreational Vehicle Dump Station
 - Vault Privy
- Site-specific factors necessitate the use of a wastewater holding tank, and DEQ determines that the use of a wastewater holding tank will cause a minimal risk to public health and the environment.