



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

February 1, 2021

Limited Environmental Review and Finding of No Significant Impact

**Northwestern Water and Sewer District – Hancock County
Village of McComb Sanitary Sewer Improvements Phase I
Loan number: CS391432-0161**

The attached Limited Environmental Review (LER) is for a wastewater treatment project in Hancock County which the Ohio Environmental Protection Agency intends to finance through its Water Pollution Control Loan Fund (WPCLF) below-market interest rate revolving loan program. The LER describes the project, its costs, and expected environmental benefits. Making available this LER fulfills Ohio EPA's environmental review and public notice requirements for this loan program.

Ohio EPA analyzes environmental effects of proposed projects as part of its WPCLF program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. This project's relatively narrow scope and lack of environmental impacts qualifies it for the LER rather than a more comprehensive Environmental Assessment. More information can be obtained by calling or writing the person named at the end of the attached LER.

Upon issuance of this Finding of No Significant Impact (FNSI) determination, award of funds may proceed without further environmental review or public comment unless new information shows that environmental conditions of the proposed project have changed significantly.

Sincerely,

Jonathan Bernstein

Jonathan Bernstein, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Village of McComb Sanitary Sewer Improvements Phase 1

Applicant: Northwestern Water and Sewer District
12560 Middleton Pike
Bowling Green, OH 43402

Loan Number: CS391432-0161

Project Summary

The Northwestern Water and Sewer District (NWWSD) has applied for funding from Ohio EPA's Water Pollution Control Loan Fund (WPCLF) for the Village of McComb Sanitary Sewer Improvements Phase 1 project. The project is intended to reduce manhole surcharging and sanitary sewer overflows during wet weather by repairing and replacing sections of the aged existing collection system. The total estimated loan for the project is \$1,128,976, with construction scheduled to begin in the first quarter of 2021 and to be completed in eight months.

History & Existing Conditions

NWWSD, chartered under Section 6119 of the Ohio Revised Code, was organized in 1994 to assume the water and sewer operations of the Wood County Sanitary Engineer. In 2016 NWWSD assumed drinking water and wastewater operations for the Village of McComb. McComb, located in Hancock County, has separated sanitary sewers that convey wastewater to the McComb Wastewater Treatment Plant (WWTP). McComb's new WWTP, which was constructed in 2019 and replaced the aged WWTP constructed in 1966, discharges treated wastewater to Algire Creek, with these discharges eventually flowing to Lake Erie. The WWTP's treatment process includes preliminary treatment, primary treatment, secondary treatment, and final aeration/sterilization treatment before being discharged.

The village experiences manhole surcharging, sanitary sewer overflows and basement backups related to the aged collection system. NWWSD has been performing smoke testing and closed-circuit television investigations of the sanitary sewer collection system and found certain sections of the collection system to be aged and deteriorated past the point of rehabilitation. The aged system has required expensive emergency repairs and is known to be plagued by high wet weather flows caused by inflow and infiltration (I/I)¹.

Project Description

The proposed project (see figures 1 and 2) includes the replacement of existing gravity sewer via open cut methods, with approximately 5,200 linear feet (LF) of 6-, 10-, and 12-inch sewer pipe, sewer laterals, and manholes. The project will also include 390 LF of cured-in-place pipe rehabilitation,

¹ Infiltration is the ground water that seeps into sanitary sewers through cracks, offset joints and other flaws in the pipe. Inflow is surface runoff that enters sanitary sewers through directly connected downspouts, area drains, etc.

minimal storm sewer repair, and restoration activities. This project is designed to replace and repair aged wastewater sewers to improve wastewater conveyance, reduce I/I, and reduce sanitary sewer overflows during wet weather.

Implementation

NWWSD proposes to borrow the entire cost for the project from Ohio's WPCLF. NWWSD will recover debt associated with this capital improvement project from monthly service fees, and the sewer rate paid by McComb's customers will not change to pay for the project. NWWSD qualifies for the WPCLF standard long-term interest rate, which for February 2021 is 0.43 percent, over 20 years. The 2020 monthly residential sewer rate in McComb is \$72.99 (\$876 annually), based on an average monthly usage of 1,037 cubic feet of water. This is 1.68 percent of the median household income of \$52,151, which is considered affordable.

The total estimated loan amount for the project is \$1,128,976. Borrowing this amount at 0.43 percent will save NWWSD approximately \$154,500 over the life of the loan compared to borrowing the same amount at the current market rate of 1.68 percent. Construction is expected to begin in first quarter of 2021 and to be completed in eight months.

Public Participation

NWWSD has a long history of working with the general public and local public officials when proposed projects are to be located in their community. This project has been discussed at NWWSD board meetings, has been detailed on NWWSD's website, and has been advertised for bids. Advance notice to residents in the form of a letter will precede construction. NWWSD is not aware of controversy surrounding this project. For a project of such limited scope and impact, this is considered adequate public involvement.

Conclusion

The proposed project meets the project type criteria for a Limited Environmental Review; namely, it is an action within an existing public wastewater collection and treatment system, which involves the functional replacement of and improvements to existing equipment. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no adverse environmental effect and will require no specific impact mitigation, because construction will not adversely affect any special resource type, general construction environmental protections will be in place, noise will be controlled with silencers on mobile equipment, dust and odors will be controlled, and air quality will be protected with emissions controls on mobile equipment and with the use of street sweeping and dust suppressants, as applicable. The project will have the public health and environmental benefits related to reducing risks related to potential human contact with raw sewage and will potentially reduce nutrients which contribute to harmful algal blooms in Lake Erie.

Will have no effect on high-value environmental resources, as construction will be limited to the repair of sewer pipes under and within roads and in road rights-of-way. No ground disturbance will take place in sensitive areas as part of this project, so there will be no effects to the following: floodplains,

wetlands, surface water, endangered/threatened species or their habitat, state and federally designated wild and scenic rivers, recreational rivers, or wildlife areas, and archaeological, historic, or cultural resources.

Is cost-effective, because the combination of replacement and repair of sewer mains, laterals, and manholes is the only feasible alternative for replacement of the aged pipe, and as it will reduce sources of I/I and the volume of wastewater requiring treatment at the WWTP.

Is not a controversial action, as there is no known opposition to the proposed project, the cost of the project is not overly burdensome to ratepayers, and WPCLF financing will save approximately \$154,500 in interest payments compared to conventional financing.

Does not create a new, or relocate an existing, discharge to surface or ground waters, and will not result in substantial increases in the volume of discharge or loading of pollutants from an existing source or from new facilities to receiving waters, since the project involves the functional replacement of and improvements to existing equipment, and not increases to pollutant discharges.

Will not provide capacity to serve a population substantially greater than the existing population, since the project is not related to serving new growth or increasing capacity at the wastewater treatment facilities.

In summary, the planning activities for the project have identified no potentially significant adverse impacts. The project is expected to have no significant short-term or long-term adverse impacts on the quality of the human environment, or on sensitive resources (surface water, ground water, air quality, floodplains, wetlands, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, federal or state-designated wild, scenic, or recreational rivers, federal or state-designated wildlife areas, or threatened or endangered species). Typical construction impacts, such as noise, dust, and exhaust fumes, will be short-term and addressed by standard construction best management practices.

The proposed project is a cost-effective way to address a section of wastewater collection system that, the majority of which, is aged and deteriorated past the point of rehabilitation. The project will allow the village to avoid expensive emergency repairs, reduce wet weather I/I and sanitary sewer overflows. Also, by using WPCLF low-interest financing, NWWSD has minimized the project cost.

Contact information

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Figure 1: Project location (in red)

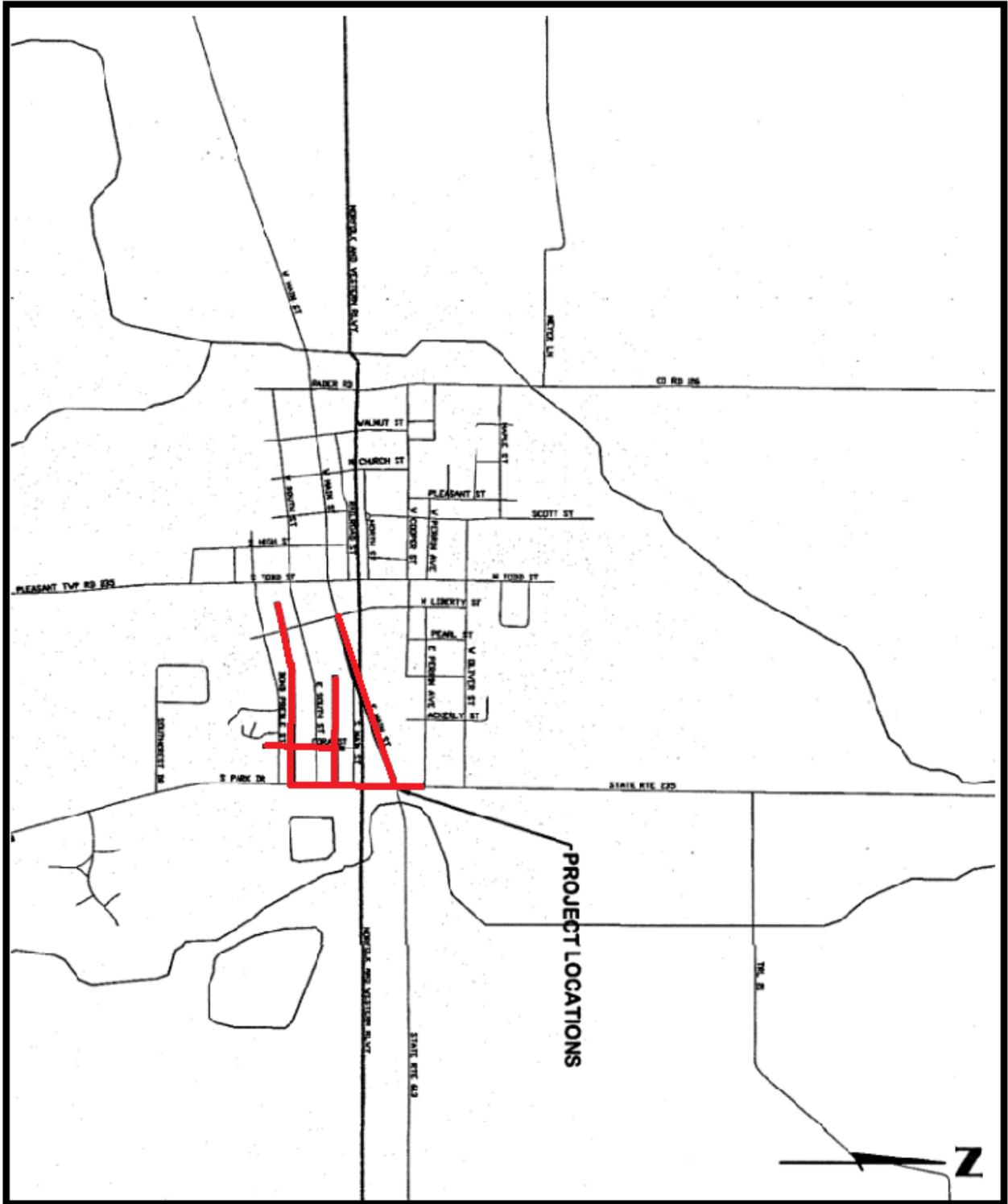


Figure 2: Village of McComb Sanitary Sewer Improvements Phase I project location