

June 17, 2016

**Issuance of A Limited Environmental Review
To All Interested Citizens, Organizations, and
Government Agencies**

**Northwestern Water and Sewer District
Wood County**

**Tracy Road Trunk Sewer Rehabilitation Project
Loan Number CS391432-0078**

The purpose of this notice is to advise the public that Ohio EPA has reviewed the referenced project and finds neither a Supplemental Study (SS) nor an Environmental Assessment (EA) is required to implement the project as discussed in the attached Limited Environmental Review (LER). Consequently, a Finding of No Significant Impact is being issued for this project.

The Water Supply Revolving Loan Fund program requires the inclusion of environmental factors in the decision-making process for project approval. Ohio EPA has done this by incorporating a detailed analysis of the environmental effects of the proposed actions in its review and approval process. Environmental information was developed as part of the facilities plan, as well as through the facilities plan review process. A subsequent review by this Agency has found that the proposed actions do not require the preparation of either an EA or an SS.

Our environmental review concluded that because the proposed project is limited in scope and meets all applicable criteria, an LER is warranted. Specifically:

- The proposed project will have no significant adverse environmental effect, nor will it adversely affect any specific resource type.
- It will not require extensive general or specific direct impact mitigation.
- It will not affect current design flow value or the existing service area.
- It is clearly cost effective.
- It is not controversial.
- It will not result in an increase in the volume of discharge or loading of pollutants to receiving water or increase the withdrawal of additional water supplies.

The LER presents additional information on the proposed project, costs and the basis for our decision. Further information can be obtained by calling or writing the contact person listed on the back of the LER.

Upon issuance of this determination, loan award may proceed without being subject to further environmental review or public comment, unless information is provided which determines that environmental conditions on the proposed projects have changed significantly.

Sincerely,



Jerry Rouch, Assistant Chief
Division of Environmental & Financial Assistance

Attachment

**LIMITED ENVIRONMENTAL REVIEW
For
Northwestern Water and Sewer District
Wood County**

**Tracy Road Trunk Sewer Rehabilitation (SS-100) Project
Loan Number CS391432-0078**

**Applicant: Jerry Greiner, President
Northwestern Water and Sewer District
12560 Middleton Pike
Bowling Green, OH 43402**

Existing Need

The Northwestern Water and Sewer District (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. Sanitary Sewer 100 (SS-100) Area is located in northern Wood County and provides sanitary sewer service to the political subdivisions of Northwood, Walbridge, Rossford and Perrysburg Township. All of NWWSD's flow from SS-100 is collected in the Tracy Road Trunk Sewer (TRTS) and conveyed to the City of Toledo's Bayview Park Wastewater Treatment Plant for treatment. The TRTS, which began construction in 1967, is a 60-inch sewer that begins near the intersection of State Route 795 and Tracy Road, and flows north along Tracy Road and Oakdale Avenue where it terminates into the City of Toledo's Eastside interceptor Sewer at Miami Street and Oakdale Avenue.

Many sewers in SS-100 are overloaded by excessive infiltration and inflow (I/I)¹ due to their age and design. I/I increases flows beyond the hydraulic capacity of pump stations, causing overflows from the pump stations and nearby manholes (sanitary sewer overflows, or SSO), and raising a public health risk from potential human contact with raw sewage. It also adds excessive wet-weather flows to Toledo's combined sewers, contributing to combined sewer overflows (CSO) at Oakdale Avenue and Miami Street to the Maumee River. Toledo is under a US EPA Consent Decree to significantly reduce its CSO activation. Part of achieving that is to require NWWSD and other tributary areas to reduce their I/I contributions.

To reduce flows to Toledo from the SS-100 area, NWWSD is undertaking an extensive program of sewer rehabilitation to exclude I/I from the sanitary sewers. This program includes the inspection of sewers to help prioritize rehabilitation efforts. Internal inspections in 2006 of the TRTS revealed corrosion damage to the sewer caused by elevated hydrogen sulfide concentrations in the sewer. Emergency repairs of those locations deemed to require immediate repairs took place in 2007. A reevaluation of the TRTS took place in 2014 and identified further areas requiring repairs due to corrosion damage or prior liner separation to be addressed in this project.

While the Tracy Road Trunk Sewer Rehabilitation (SS-100) project will improve I/I in the immediate vicinity of the project, the main goal of the project is related to sewage conveyance and to protect the integrity of the TRTS from further degradation by hydrogen sulfide, which would likely necessitate more invasive and expensive repair and replacement actions.

The proposed Tracy Road Trunk Sewer Rehabilitation (SS-100) project will rehabilitate these sewers primarily using approximately 3,500 linear feet of cured-in-place pipe (CIPP) lining, in which a sleeve of resin-infused material is inserted into the pipe via existing manholes and formed to the interior under pressurized steam. Repair and modification of approximately 24 manholes and reestablishment of service laterals will take place as

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.

part of this project. Additionally, the removal of approximately 400 linear feet of an existing, failed liner and subsequent sewer cleaning will take place in a northern section of the trunk sewer along Oakdale Avenue.

The rehabilitation option of CIPP lining was selected because these monolithic concrete sections under consideration are structurally sound and are good candidates for lining. These short lineal sections of pipe create potential infiltration sites that CIPP lining would eliminate. CIPP lining is also the most cost-effective alternative, as it will restore structural integrity to the deteriorated sections of the pipe and prevent further corrosion of the pipe interior surface by sealing the pipe's concrete surface behind the repair liner. The CIPP lining alternative also eliminates issues related to traffic disruption, environmental and habitat degradation and potential impacts to historic or cultural resources. The removal of approximately 400 linear feet of an existing, failed liner and subsequent sewer cleaning that will take place in the trunk sewer along Oakdale Avenue was the chosen action to avoid flow disruptions related to the liner separating from the pipe. The pipe was evaluated and found to be solid and not requiring relining.

Implementation

NWWSD proposes to borrow the entire cost for the project from Ohio's Water Pollution Control Loan Fund (WPCLF). NWWSD will recover debt associated with the project from a general maintenance fund, which means that the sewer rate paid by SS-100 customers will not change to pay for the project. NWWSD qualifies for the WPCLF standard long-term construction interest rate, which for the month of June, 2016 is 1.58 percent over 20 years. The WPCLF standard rate changes monthly. The 2016 monthly residential sewer rate in SS-100 Area is \$84.55 (\$1,015 annually), based on an average monthly usage of 1,037 cubic feet. This is 1.9 percent of the median household income of \$53,298, which is considered affordable.

The total estimated project cost is \$2,844,169.17. This includes \$2,462,720 for construction, \$80,000 for design costs, \$88,000 for engineering services and \$135,456 contingency. Borrowing this amount at 1.58 percent will save NWWSD \$415,844 over the life of the loan compared to borrowing the same amount at the current market rate of 2.83 percent. Construction is expected to begin in July, 2016 and be completed in October, 2016.

Public Involvement

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 aware of no controversy surrounding this project. For a project of such limited scope and impact, this is considered adequate public involvement.

Conclusion

The Tracy Road Trunk Sewer Rehabilitation (SS-100) project constitutes a general project type (sewer rehabilitation) that qualifies for a Limited Environmental Review. Specifically, it meets the following criteria.

It will not affect any special resource type. The construction will be limited to the interiors of sewer pipes under roads and in road rights-of-way. No ground disturbance will take place 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.

It will not require specific impact mitigation. 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.

It is clearly cost-effective. CIPP lining is the most cost-effective alternative, as it removes the sources of I/I without the more intrusive and costly actions related to sewer pipe replacement.

It is not controversial. No local rate increase will be associated with the debt repayment. It will generate no excessive population growth, nor will it have significant adverse environmental effects that could raise public concern. The rates that NWWSD applies to its general service area are affordable.

It does not involve a new or relocated discharge to surface or ground water, involve any increase in volume of discharge or loading of pollutants from an existing source or new facilities, or provide capacity to serve a design population substantially greater (thirty percent) than the current design population. The project does not require the expansion of Toledo's wastewater treatment facility beyond its current design capacity, the installation of a satellite treatment facility, or other action that could increase discharges or add or relocate discharge points. Increases in pipe capacity or service extensions into undeveloped areas have not been included in the projects. Thus, the projects will not result in adverse secondary (development-related) environmental impacts, such as farmland or wetland conversion for building purposes.

The planning activities for the proposed sewer rehabilitation project have identified no potentially significant short-term adverse impacts to the quality of the human environment or sensitive resources (floodplains, wetlands, surface water, endangered species or their critical habitat, cultural properties, raw water supplies, scenic or recreational rivers, air quality, farmland, or state and federal wildlife areas). Impacts related to dust, noise and odors will be temporary and well controlled during construction.

The project will yield health benefits by helping reduce public exposure to sanitary sewer overflows.

For further information, please contact:

R. Eric Schultz
Division of Environmental & Financial Assistance
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43216-1049

Phone: (614) 644-3713

E-mail: eric.schultz@epa.ohio.gov

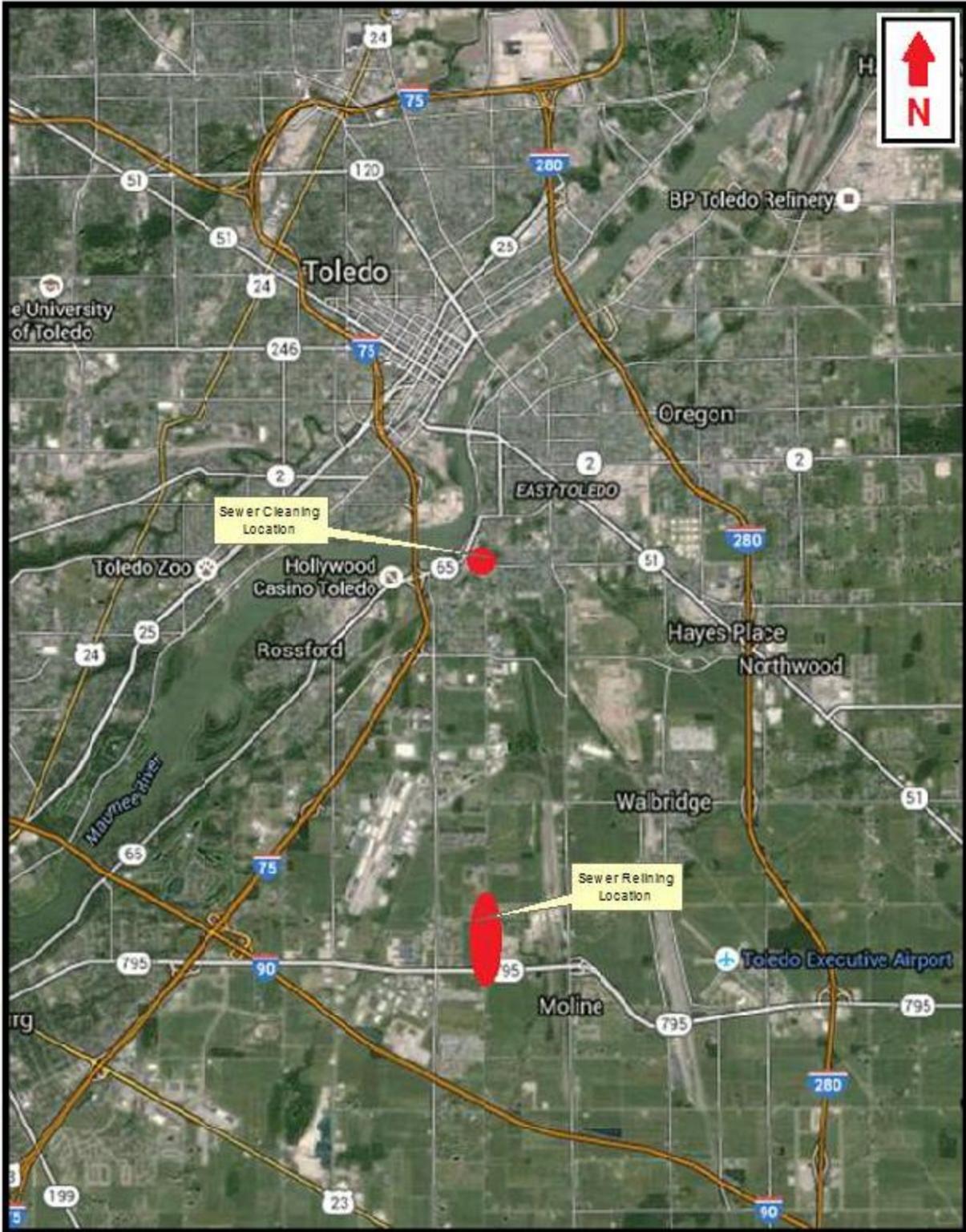


Figure 1: General project locations (in red).

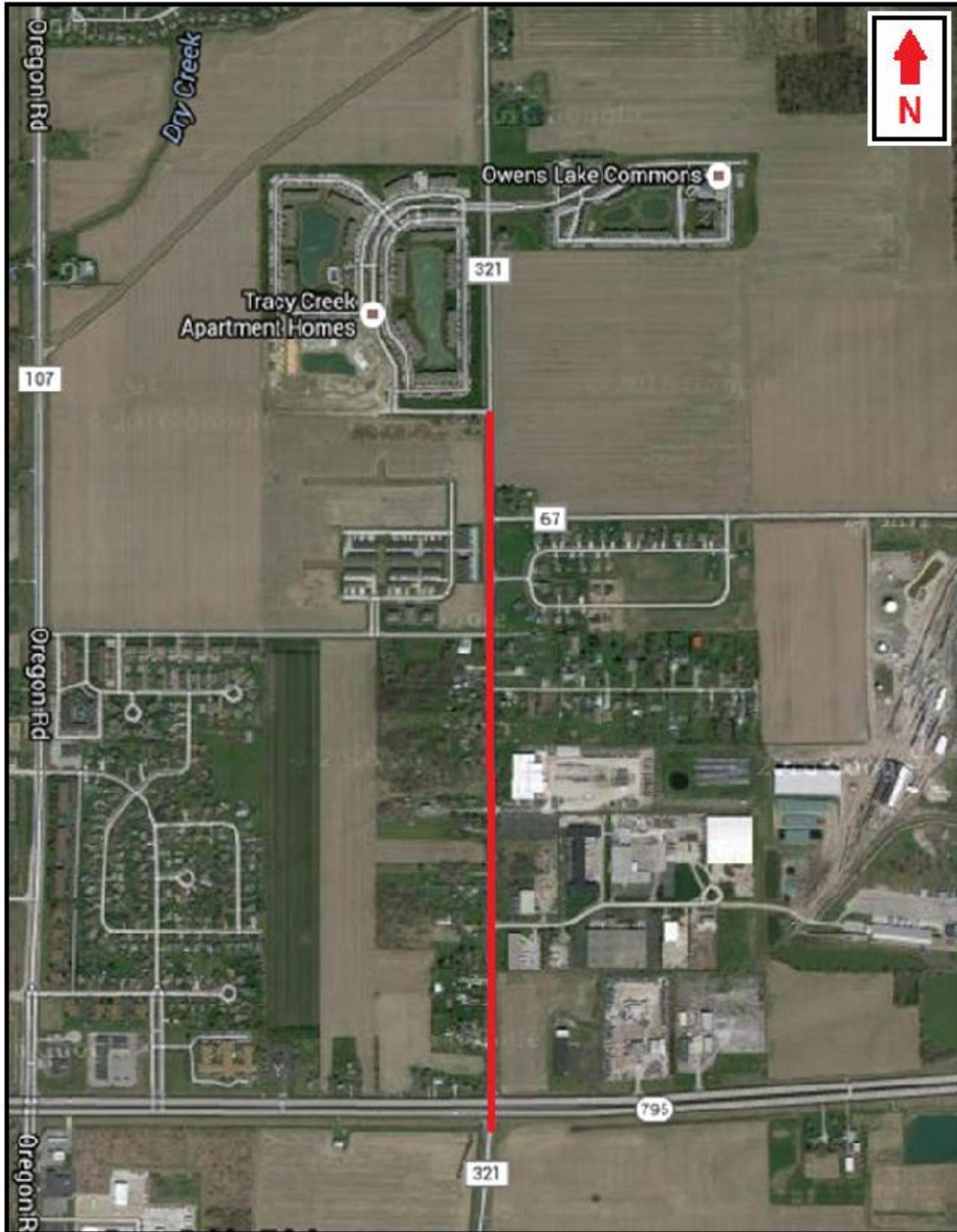


Figure 2: Project location of sewer relining and repair.

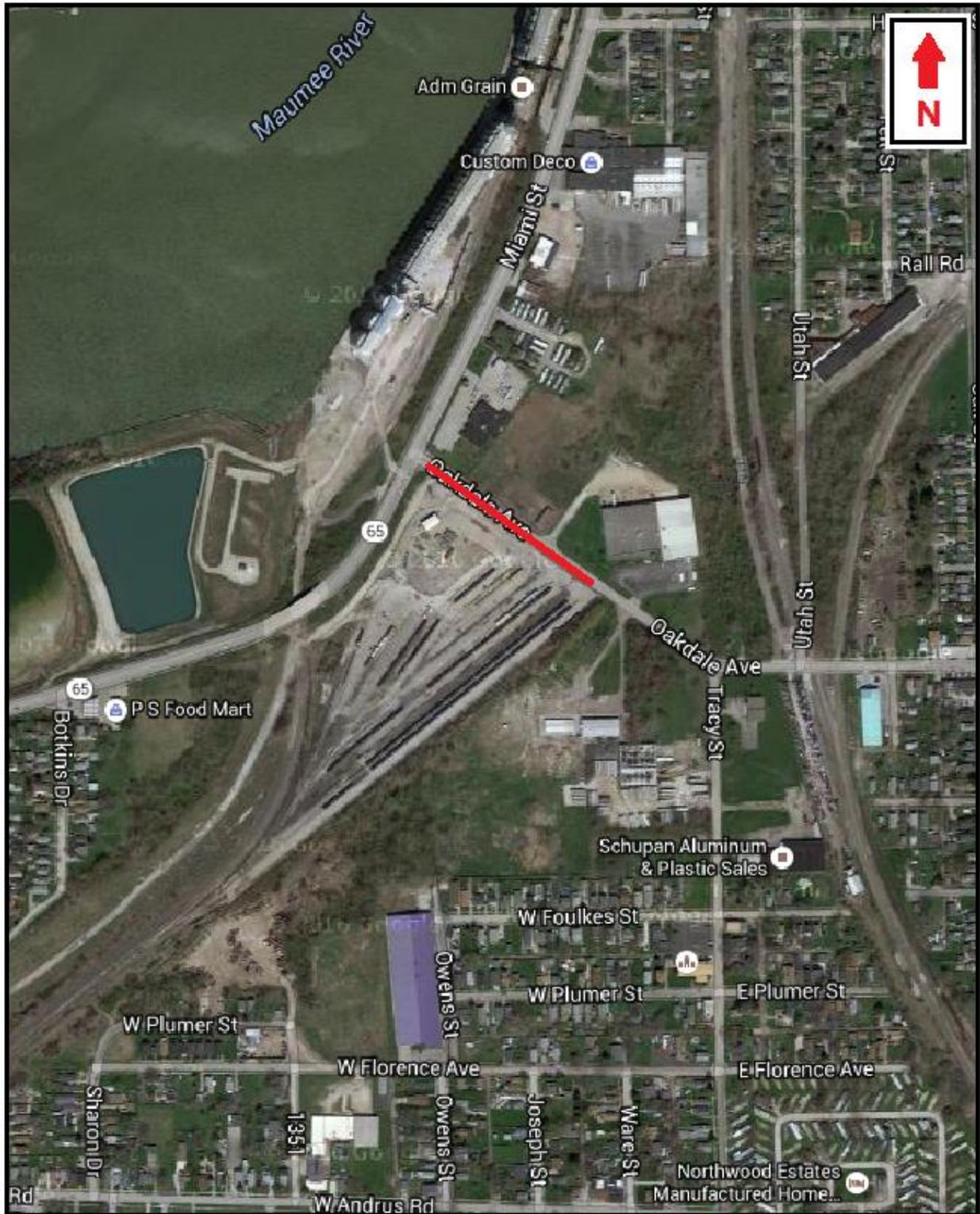


Figure 3: Project location of sewer cleaning and liner removal.