



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

October 31, 2016

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

**Northwestern Water and Sewer District
Wood County**

**Williamsburg on the River Sanitary Sewer Rehab Project
Loan Number CS391432-0123**

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 action 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 action does 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,



for
Jerry Rouch, Assistant Chief
Division of Environmental & Financial Assistance

Attachment

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

**Williamsburg on the River Sanitary Sewer Rehab Project
Loan Number CS391432-0123**

**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. The Williamsburg on the River (WOTR) community and wastewater treatment plant (WWTP) are located in Washington Township, in western Wood County. The WWTP, constructed in 2009, is in significant non-compliance of its National Pollutant Discharge Elimination System (NPDES) permit for discharges of nitrogen and ammonia in its effluent. These nutrients are of particular concern as they discharge to the Maumee River, a major tributary of the Western Lake Erie Basin, and may contribute to the production of harmful algal blooms and their toxins, which are an environmental and human health risk. Furthermore, the WWTP's discharge is located only 3.5 miles upstream of the City of Bowling Green's primary drinking water intake. These discharges also create a public health risk from potential human contact with raw sewage.

The primary cause of the WWTP's violations is excessive infiltration¹ which creates flow beyond the hydraulic capacity of the WWTP. This infiltration causes waste solids to be flushed from the WWTP, even during periods of low rainfall. The sewer collection system was installed in various stages and with different materials, including truss pipe, vitrified clay pipe and PVC pipe. Infiltration is entering the collection pipe due to the pipe's age, improper installation and sealing of pipe and pipe joints, corrosion from hydrogen sulfide gas, and shifting and settling of the ground in the project area. Infiltration is also entering the system at manholes due to improper installation, shifting and settling of the ground, and corrosion from hydrogen sulfide.

The Williamsburg on the River wastewater collection system serves approximately 150 residences along and adjacent to the Maumee River. Wastewater is conveyed to the WWTP, located at 19010 Brillhart Road, which is operating under an NPDES permit which will expire July 31, 2017. The proposed project is directly related to the WWTP's permit renewal process.

The proposed Williamsburg on the River Sanitary Sewer Rehab project will rehabilitate the 8-inch vitrified clay pipe within the system by using approximately 4,000 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. The system's 8-inch truss pipe and PVC pipe, while structurally sound, will be grouted at their joints. 44 manholes will be repaired, lined and replaced, as necessary, and service laterals connections will be reestablished and sealed.

The rehabilitation option of CIPP lining and joint grouting was selected because each of the three types of sewer pipe are structurally sound and are good candidates for lining and grouting. These short lineal sections of the various sewer pipe create potential infiltration sites that CIPP lining and grouting would eliminate. CIPP lining and grouting

¹ Infiltration is the ground water that seeps into sanitary sewers through cracks, offset joints and other flaws in the pipe.

is also the most cost-effective alternative, as it will restore structural integrity to the deteriorated sections of the pipe and significantly reduce infiltration. The CIPP lining alternative also minimizes issues related to traffic disruption, environmental and habitat degradation, site restoration and potential impacts to historic or cultural resources.

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 the project's 150 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 December, 2016 is 1.55 percent over 20 years. The WPCLF standard rate changes monthly. The 2016 monthly residential sewer rate project area is \$84.11 (\$1,009 annually), based on an average monthly usage of 1,037 cubic feet. This is 1.9 percent of the median household income of \$52,069, which is considered affordable.

The total estimated project cost is \$420,000. Borrowing this amount at 1.55 percent will save NWWSD \$61,300 over the life of the loan compared to borrowing the same amount at the current market rate of 2.8 percent. Construction is expected to begin in the winter of 2017 and be completed in three months.

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 Williamsburg on the River Sanitary Sewer Rehab 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 and sewer manholes under roads and in road rights-of-way. Aside from manhole replacement, 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 and grouting is the most cost-effective alternative, as it removes the sources of infiltration 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 Williamsburg on the River'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.

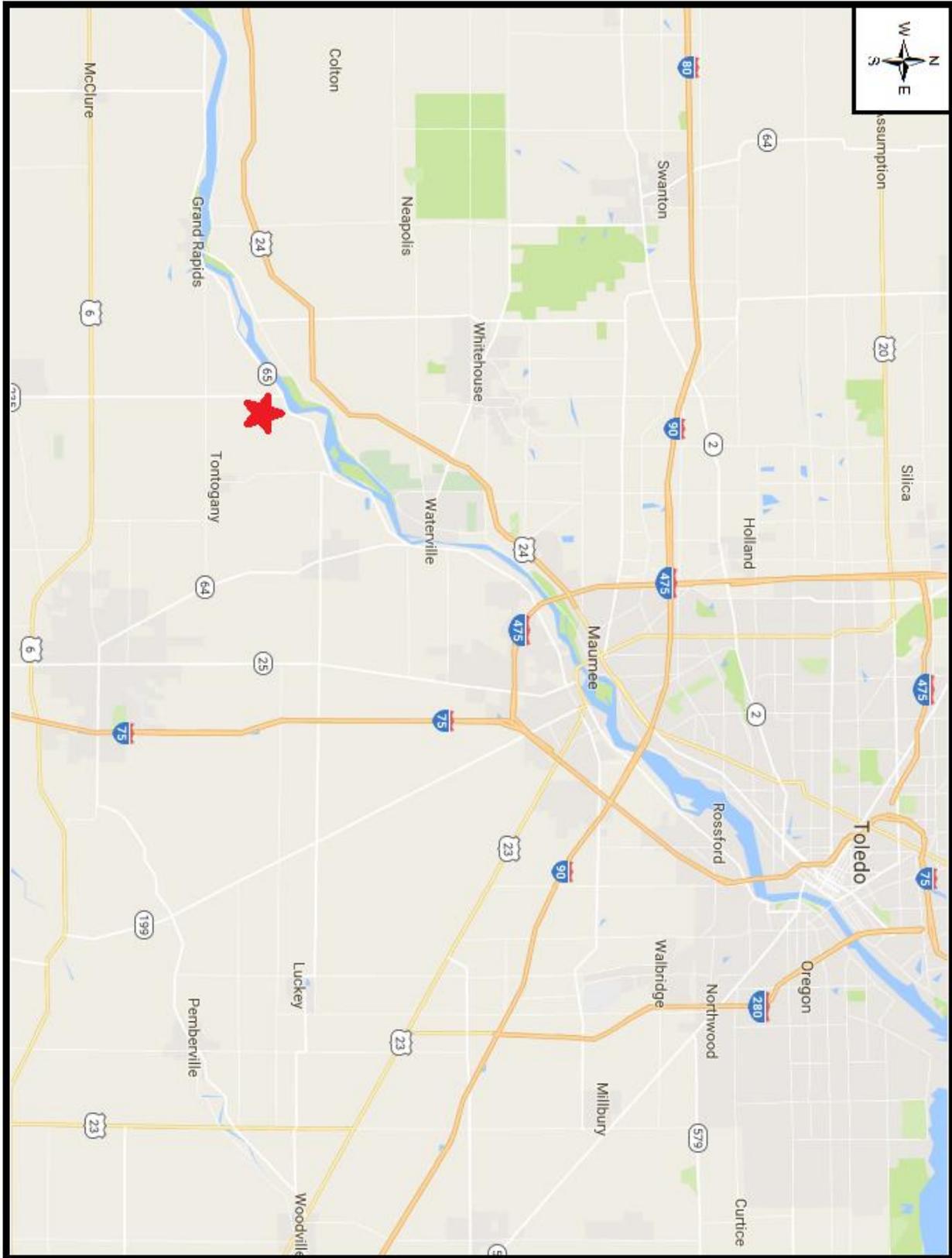
The project will yield environmental and human health benefits by eliminating exposure to discharges of untreated sewage. The project will also reduce the discharge of nitrogen and ammonia in the WWTP's effluent. These nutrients contribute to the production of harmful algal blooms (HAB) and their toxins in the Maumee River and Western Lake Erie Basin.

For further information, please contact:

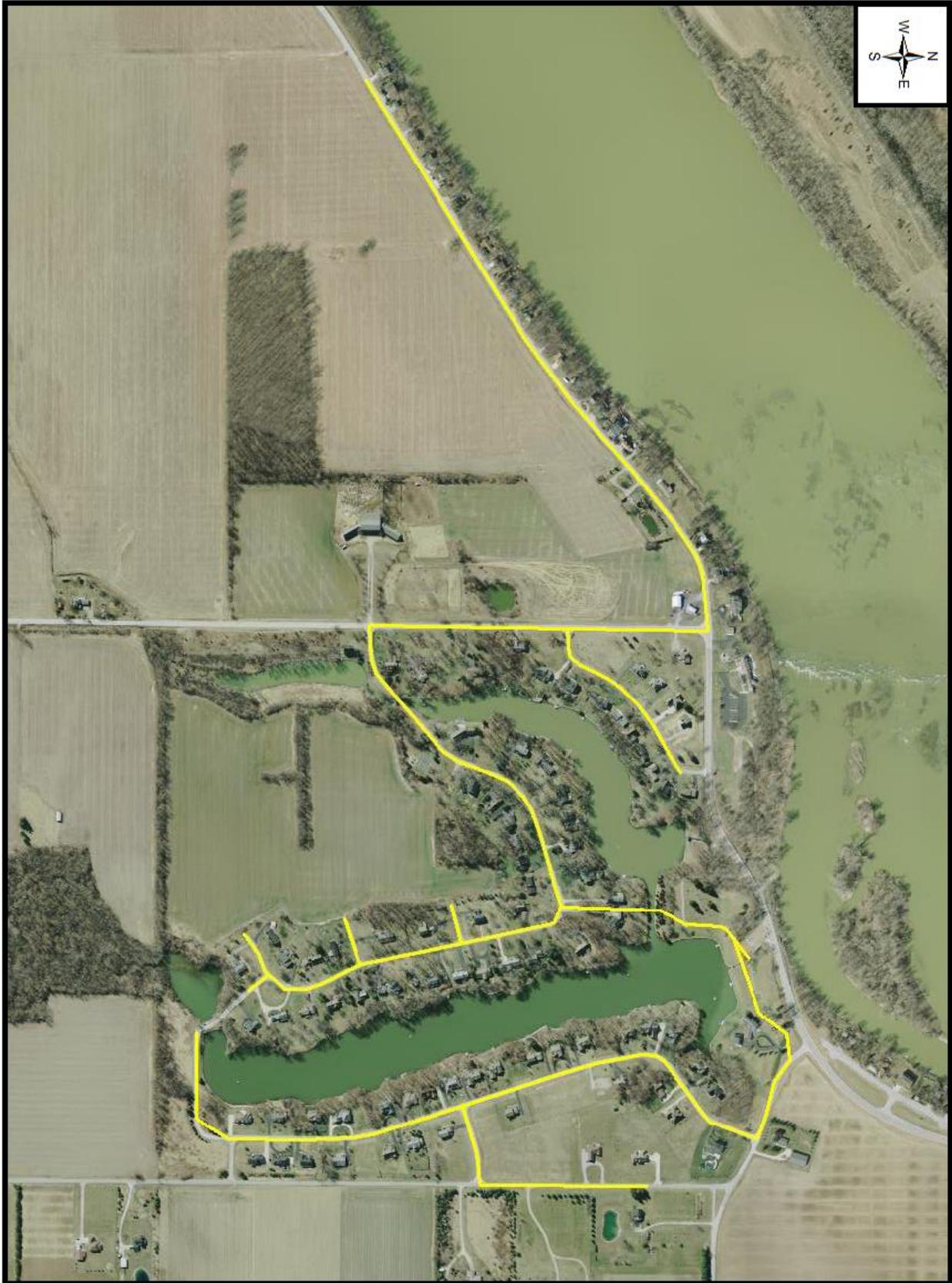
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General project location (in red)



Project location (in yellow)