



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

July 14, 2017

Notice of Issuance of a Limited Environmental Review and Final Finding of No Significant Impact to All Interested Citizens, Organizations, and Government Agencies

Lorain County Pheasant Run Sanitary Sewer Rehabilitation Project
Loan # CS390047-0019

The purpose of this notice is to advise the public that Ohio EPA has reviewed the referenced project and finds that neither an Environmental Assessment (EA) nor a Supplemental Study (SS) is required to complete the environmental review of the project. Instead, the proposed project meets the criteria for a Limited Environmental Review (LER). These criteria are summarized below in this document and in the attached LER.

The Water Pollution Control Loan Fund (WPCLF) 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 planning process. A subsequent review by this Agency has found that the proposed action does not require the preparation of 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 constitutes an action in a sewer community which is for minor rehabilitation of existing facilities, infiltration and inflow correction, and functional replacement of a portion of the sanitary sewers in the Pheasant Run subdivision of southern Lorain County. In particular, the proposed sanitary sewer rehabilitation project is expected to entail cured-in-place pipe lining, manhole rehabilitation through silica-aluminate grouting, manhole cover inserts, lateral grouting, lateral reinstatement, and one point repair to the sanitary sewers. All told, about 3.4 miles of sanitary sewers and associated manholes will be rehabilitated during this project. Furthermore, the proposed project:

- is cost-effective;
- will have no effect on high value environmental resources;
- has no potential for associated significant adverse environmental impacts;
- does not require extensive impact mitigation unique to the assistance proposal;
- is not the subject of significant public interest or controversial;
- will not create a new, or relocate an existing, discharge to surface or ground waters, or cause pollution of surface or ground waters;

- will not result in substantial increases in the volume of discharge or the loading of pollutants from an existing source or from new facilities to receiving waters; and
- will not provide capacity to serve a population substantially greater than the existing population.

A map depicting the location of the proposed project is included as part of the LER. The LER presents additional information on the proposed project, its costs, and the basis for our decision. Further information can be obtained by calling or writing the contact person named at the end of the LER.

The LER was completed for the proposed project as it will not individually, cumulatively over time, or in conjunction with other Federal, State, local, or private actions have a significant adverse effect on the quality of the human environment. Consequently, a Finding of No Significant Impact (FNSI) now can be issued for the proposed project.

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

Sincerely,



Jerry Rouch, Assistant Chief
Division of Environmental and Financial Assistance

JR/KH

Attachment

LIMITED ENVIRONMENTAL REVIEW (LER)

Date: July 14, 2017

A. Project Identification

Name: Lorain County Pheasant Run Sanitary Sewer Rehabilitation Project

Address: Mr. James R. Cordes, County Administrator
Lorain County
226 Middle Avenue
Elyria, OH 44035

WPCLF #: CS390047-0019

B. Existing Need

The Pheasant Run Association currently owns and operates its own wastewater treatment plant (WWTP) and tributary collection system (see Figure 1). Based on information provided by the county, the Pheasant Run collection system is about 45 years old and subject to excessive infiltration/inflow, or I/I.¹ The county's proposed sanitary sewer rehabilitation project is intended to address this hydraulic overloading problem and the effects it has on the operation of the Pheasant Run WWTP. Ohio EPA expects this proposed project will reduce the extraneous flows in the Pheasant Run sanitary sewer system, as well as the associated annual operation and maintenance (O&M) costs. More information on the county's proposed project can be found below and in the environmental assessment issued before on the county's proposed lift station and force main project. Upon this project's completion, Lorain County will assume ownership and operation of the collection system serving the project area. Construction of the lift station and force main project will allow the Pheasant Run WWTP to be eliminated.

The main benefit of the county's overall regionalization strategy for the Pheasant Run project area will be the improved operation of the wastewater collection system, elimination of the existing WWTP's discharge, and conveyance of the project area's wastewater to the Village of LaGrange's WWTP for treatment and discharge to Kelner Ditch. Readers should note that the county also has determined that the water meters in the project area shown below in Figure 1 need to be replaced.

¹ Infiltration/Inflow (I/I) is defined as extraneous, clear water that enters a sanitary sewer system through surface or subsurface locations. Inflow may include clear water entering the system through manhole covers, roof or foundation drains, direct storm sewer connections, etc. Infiltration usually occurs when clear water enters the system below ground through cracked or broken pipes and manholes, poorly sealed or misaligned pipe joints, damaged or poorly-connected sewer laterals, etc.

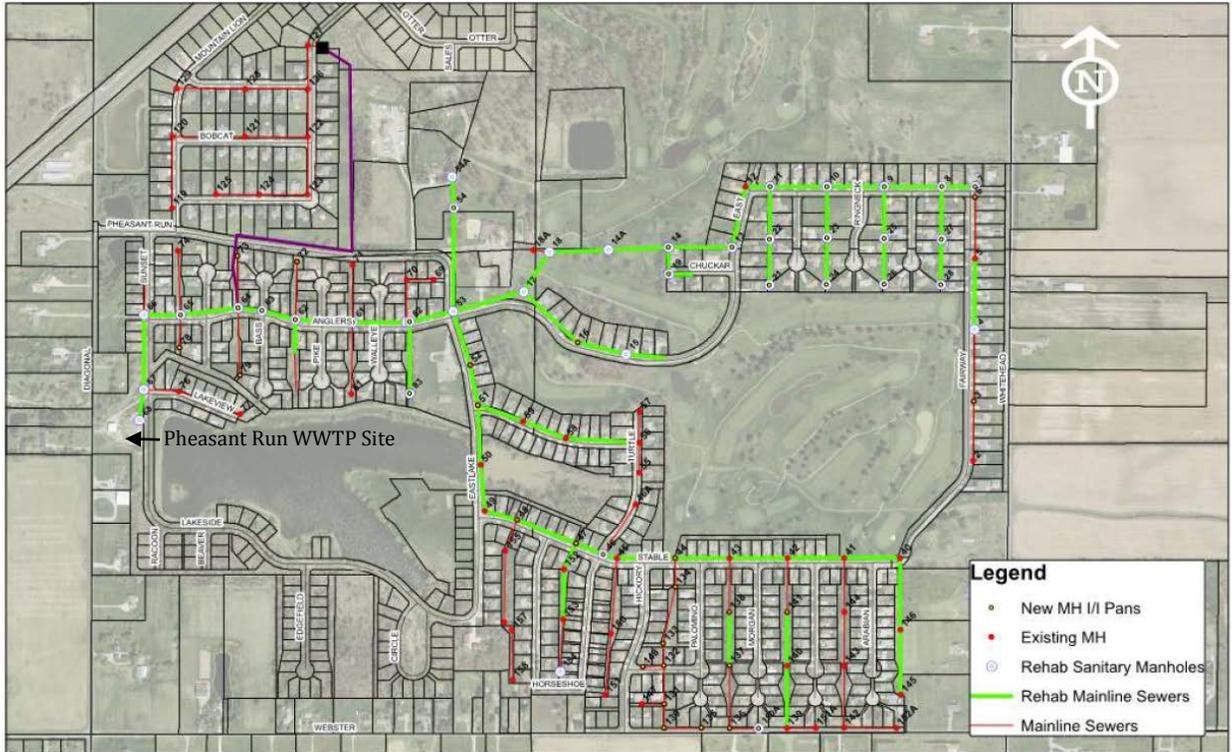


Figure 1, Lorain County's Pheasant Run Sanitary Sewer Rehabilitation Project

C. Project Description

After determining that a no-action alternative would leave the extraneous flow problems in the Pheasant Run Association's wastewater collection system unaddressed, the county's consulting engineer found that significant sanitary sewer and manhole repairs are needed within the project area shown in Figure 1. According to the county's sanitary engineer, the proposed project includes work to repair 17,943 lineal feet of 6-inch, 8-inch, 10-inch, and 12-inch diameter sanitary sewers through video inspection and cured-in-place pipe techniques; 38 manholes through silica-aluminate grouting to eliminate ground water infiltration; 55 manholes through the installation of manhole lid inserts; and 213 (plus or minus 10) publicly owned service laterals through grouting and reconnection to the project area's sanitary sewer system upon completion of the main sanitary sewer lining effort. According to the county, there are 12 locations (out of 55) where manhole cover inserts are the only proposed improvements. In all other instances, the project area's scope entails a combination of the five activities indicated above to prevent ground water infiltration and surface storm water inflow from entering the sanitary sewers in the project area. Finally, the county proposes to make one sanitary sewer point repair under Forest Park Drive. Overall, the county expects the sanitary sewer system repairs summarized above to occur within existing rights-of-way or in existing easements where the known sanitary sewers go

between streets or behind houses at an estimated total project cost of \$1.5 million. The county's overall proposal for the Pheasant Run project area includes a later addition of 536 water meter replacements for each residence throughout the subdivision. The proposed water meter project is expected to cost about \$267,132. The county expects that the two projects will take about one year to complete.

D. Project Implementation and Project Cost Estimates

To implement the proposed \$1.2 million construction cost project described above, Lorain County intends to finance the improvements to the Pheasant Run Association wastewater collection system through Ohio EPA's Water Pollution Control Loan Fund (WPCLF). Under the WPCLF program, this project qualifies for a small community fixed interest rate, thirty-year loan. Prior to loan award, this fixed interest rate is adjusted monthly to reflect changing market conditions. Through July 31, 2017, this small community interest rate is set at 1.60%. Regarding the water meter replacement project, the county currently qualifies for a 3.40% interest rate loan spread over a 30-year repayment period from the Ohio Water Development Authority (OWDA).

According to Lorain County, customers of the Pheasant Run Association project area can expect a post-project, annual sewer service charge of \$117.63 to cover the annual debt service costs of the WPCLF loan for the sanitary sewer rehabilitation project. In addition, they can expect a post-project, annual water bill addition of about \$26.43 to cover the 30-year debt on the water meter replacements project.

When these two annual fees (\$144 together) are added to the annual equivalent costs of the county's lift station and force main project debt service (\$229) and O&M (\$288) costs, they equal \$661. Expressed as a percentage of the county's median household income of \$52,610, the total annual fee for all the county's proposed Pheasant Run water and wastewater improvements is equivalent to 1.26% of this figure. Ohio EPA considers this annual cost to be affordable for an average resident. On this basis, the proposed project is not expected to result in any significant adverse economic impacts on project area residents.

Ohio EPA expects that the county will save about \$512,946 over 30 years when compared to a market-rate loan of 3.40% on the total eligible project costs of \$1.5 million.

E. Limited Environmental Review Criteria

Because Lorain County's proposed Pheasant Run sanitary sewer rehabilitation project meets certain minimum conditions and will not individually, cumulatively over the useful life of these improvements, or in conjunction with other federal, state, or private action have a significant adverse effect on the quality of the human

environment, a Limited Environmental Review (LER) is warranted. More specifically, the LER conditions cover actions in sewer communities like Lorain County's that are for minor rehabilitation of existing facilities, infiltration and inflow correction, and functional replacement of existing facilities. Specifically, Lorain County's proposed improvements to the Pheasant Run sanitary sewer system meet the following criteria.

- 1. The proposed project will have no significant adverse environmental effects.** As noted above, the county's proposed project consists of six types of improvement to rehabilitate the sanitary sewers and associated manholes in the Pheasant Run Association project area shown in Figure 1. Because this project area was previously disturbed by sanitary sewer construction activities in the early 1970s, the location for this project is generally devoid of any important natural or historic features that require special attention or could be adversely affected by the county's proposed project. Moreover, the minimal amount of surface disturbance needed to implement this project and the county's expectation that tree removal will be limited to street trees suggest that the project's potential for direct, indirect, and cumulative impacts to the environment is minimal.

While this conclusion was reached primarily because of the location and scope of the proposed improvements, Ohio EPA also expects that any sanitary sewer pipe and manholes that have exceeded their useful life and cannot be reused will be properly disposed of in registered landfills. Residents living near the project area should also not notice any significant increase in truck traffic, air pollution, or odors during the one-year construction period. Provisions have been provided in the contract documents to assure that trucks and equipment are properly maintained to minimize noise and air quality impacts.

- 2. The proposed project does not require extensive general or specific impact mitigation.** As all the proposed sewer rehabilitation work to complete the project will occur within a previously-disturbed area within the subdivision, it does not require any extensive mitigation of environmental impacts. Where potential concerns about the short-term construction-related effects of the proposed project have been identified, these will be addressed by the contractor(s) following routine construction-related best management practices and adherence to a list of prohibited construction activities. These practices will assure that noise, dust, runoff, and odors from the construction area are properly controlled, and that no adverse offsite impacts from placement of excavated materials in any environmentally sensitive locations occur.
- 3. The proposed project will have no adverse effect on high value environmental resources.** According to the reviews completed by federal, state, and regional agencies, high value cultural or environmental resources are

generally absent from the project area shown in Figure 1. The previously-disturbed project location also supports this conclusion. Accordingly, Ohio EPA expects that the no adverse effects on high value environmental resources will occur during the construction of this overall project. The nearest aquatic resources of any significance are generally small, intermittent tributaries to Wellington Creek, their associated floodplains, and Ponderosa Pine Lake. Given the limited scope of the proposed project and the activities planned to restore the project area upon project completion, none of the project area water resources will be adversely affected. Rather, the proposed improvements to the county's sanitary sewer system, when combined with elimination of the Pheasant Run WWTP, should result in improved water quality within these streams and Ponderosa Pine Lake.

4. **The selected alternative for this project is clearly cost-effective.** In comparison to a no-action alternative and the three other viable options (total sanitary sewer replacement, sewer joint grouting, and sewer pipe bursting and replacement) it evaluated, Lorain County has documented that its selected alternative (based in part on cured-in-place pipe lining) for addressing the sanitary sewer problems in the Pheasant Run project area is clearly more cost-effective. For more details, please see the project description on Pages 2-3.
5. **The proposed project is not a significantly controversial action.** Based on the general support for this project at the county's public meeting held during April 2017 as part of its overall outreach to the residents of the project area, Ohio EPA has determined that this specific sanitary sewer rehabilitation project and the proposed water meter project are non- controversial.
6. **The proposed project does not involve new or relocated discharges to surface or ground waters.** The proposed sanitary sewer rehabilitation project by itself will not entail any new or relocated discharge of wastewater to surface or ground water. Instead, the proposed project will minimize the amount of extraneous flows entering or exiting the sanitary sewer system in the Pheasant Run project area shown in Figure 1 and improve the overall system's ability to transmit raw wastewater under all kinds of weather to the proposed lift station and force main conveying flows to the LaGrange WWTP. As a result, the Pheasant Run Association sanitary sewers after these proposed improvements are expected to provide a long-term solution to the area shown in Figure 1.
7. **No substantial increase in the volume of discharge or the loading of pollutants from an existing source or from new facilities to receiving waters will occur.** This proposed project meets this criterion. Based on the limited scope of the proposed project (see Pages 2-3 above) discussed in this document, there will not be a substantial increase in the volume of wastewater discharged, or a significant increase in the loading of pollutants discharged to

Wellington Creek's tributaries and Ponderosa Pine Lake. Rather, the capacities of the project area's sanitary sewers will be restored to their original levels, and the wastewater flows that should not go into the water resources listed above or ground water will be properly routed to the LaGrange WWTP for treatment and discharge as required by its National Pollutant Discharge Elimination System (NPDES) permit. Hydraulic overloading that contributed to poor performance of the Pheasant Run WWTP and impacts to the noted water resources is expected to cease.

- 8. The proposed project will not provide capacity to serve a population substantially greater than the design-year population.** As noted above, the purpose of this project is to address the structural deficiencies within the Pheasant Run Association's sanitary sewer system and restore its ability to properly convey wastewater. It is not intended to increase the capacity of the project area's sanitary sewer system to convey wastewater, nor directly enlarge the capacity of the LaGrange WWTP, so it can treat more influent. Accordingly, the basis-of-design for the proposed improvements to the Pheasant Run Association's sanitary sewers is consistent with the original design of the sanitary sewer system and will only provide capacity to serve the previously established design-year population of the project area. Thus, this project's basis of design (population projections and flow figures established during planning) are consistent with the current attainment status of Lorain County under the Clean Air Act and with regional planning under Section 208 of the Clean Water Act.

F. Proposed Project Schedule

Lorain County currently expects the construction of the Pheasant Run Association project area sanitary sewer rehabilitation project to begin in October 2017 and take about one year to complete, including final site restoration. Under this schedule, the county expects that this project will be completed by November 2018.

G. Public Notice and Participation

During the planning for this proposed project, Lorain County held a public information meeting and assessment hearing in April 2017. In addition, public meetings dating back to 2014 were held and provided project area residents to provide input on the direction of this project and the related lift station and force main project. Information provided by the county indicated that about 100 people attended the April 2017 meeting. Through these meetings dating back to 2014, it appears that the county and the Pheasant Run Association board provided project area residents with ample opportunity to have their questions answered during the public review and comment period. These questions focused on the costs of the new water meter project under consideration, the relative costs of wastewater solutions,

how the current and future residents would have to pay for the project (tap in fees versus sewer service charges and assessments), the costs of the assessments and sewer service charges, the possibility of service interruptions and how they would be handled, the conditions of the sewer laterals, how much LaGrange surcharges outside customers, and flooding concerns in the project area. On this basis, Ohio EPA has concluded that the public participation requirements of the WPCLF program were met and that the county has appropriately involved the public in the decision-making process for its proposed sanitary sewer rehabilitation and water meter replacement projects described in this document, as well as the proposed WPCLF and OWDA funding.

H. Interagency Coordination

The proposed project has been reviewed by the following agencies for technical input, or for conformance with legislation under their jurisdiction, and their findings support a LER:

Northeast Ohio Areawide Coordinating Agency
Ohio Department of Natural Resources Ohio EPA
State Historic Preservation Office United States Fish and Wildlife Service

I. Conclusion

The proposed project is sufficiently limited in scope and meets all applicable criteria to warrant a LER. The planning activities for the proposed project have identified no potentially significant adverse impacts. As well, the proposed project is expected to have no short- or long-term adverse impacts on the quality of the human environment or on sensitive resources such as floodplains, wetlands, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, coastal areas, or threatened or endangered species. The improved operation of the Pheasant Run sanitary sewer system is the expected benefit of this proposed project.

J. For further information, please contact:

Kevin Hinkle
Environmental Planning Unit
Technical Review Section
Office of Financial Assistance
Division of Environmental and Financial Assistance
Ohio Environmental Protection Agency
50 West Town Street, Suite 700, P.O. Box 1049
Columbus, Ohio 43216-1049
Phone: (614) 644-3712
Fax: (614) 644-3687