



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

November 28, 2016

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

**City of Columbus
Jackson Pike WWTP Corrosion Prevention and Protection Project
CS390274-0220**

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, this project meets the criteria for a Limited Environmental Review (LER). These criteria are summarized below in this document and in the attached LER.

The project will extend the life of the wastewater treatment plant by removing rust and coating, or recoating, plant assets to prevent future corrosion including the centrifuge thickening building basement, sludge pit area, tunnels C, D, G, H, I, L and N, pump and blower building, grit removal building, generator building, flushing water pump station, and the chlorine contact tanks.

The LER was completed for this 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 can be issued now for this project.

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, a Limited Environmental Review is warranted. Specifically, the project consists of improvements to an existing wastewater treatment plant. Furthermore, the proposed project:

- * has no significant environmental effect;
- * does not require extensive specific impact mitigation;
- * has no effect on high value environmental resources;
- * is cost effective;
- * is not a controversial action;
- * does not create a new, or relocate an existing discharge to 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 project is included as part of the LER. The LER presents 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 listed on the back of the LER.

Upon issuance of this determination, loan awards may proceed unless information is provided which determines that environmental conditions for the proposed project have changed significantly.

Sincerely,



Jerry Rouch, Assistant Chief
Division of Environmental & Financial Assistance



Attachment



LIMITED ENVIRONMENTAL REVIEW

The following project qualifies for a Limited Environmental Review (LER) based on criteria found in Rule 3745-150-05 of the Ohio Administrative Code. A project must meet all criteria for both project *type* and *potential adverse impacts* to qualify for a LER.

A. PROJECT IDENTIFICATION

Name: Jackson Pike WWTP Corrosion Prevention & Protective Coating Phase 3

Applicant Address: Ms. Tracie Davies, Director
City of Columbus, Department of Public Utilities
910 Dublin Road
Columbus, Ohio 43215-9060

WPCLF No.: CS390274-0220

B. PROJECT DESCRIPTION

The City of Columbus (Columbus) Jackson Pike Wastewater Treatment Plant (WWTP), located at 2104 Jackson Pike Road south of Columbus, was constructed in 1935 and has gone through many upgrades since its inception, including several upgrades to various processes to increase the capacity of the facility. On May 18, 2012, Columbus prepared a Condition Assessment Report describing the condition and recommendations for protecting and preventing the corrosion of infrastructure within the WWTP including buildings, tunnels, and all above ground structures such as piping, general process equipment, and gates (collectively termed assets). The current condition of the paint and other protective coatings on the WWTP infrastructure varies significantly. The majority of assets are in excellent condition, though some have deteriorated due to lack of rehabilitation over the past 12 years. Conditions were determined based on the degree of rust and current paint condition using standards endorsed by the American Association of Testing and Materials (ASTM).

To address deteriorated assets and ensure that other assets remain in good condition, Columbus has undertaken a painting and coating program for the WWTP assets described above. This current project represents the last of three phases of the corrosion prevention and protective coating program. The most common methods used as part of the program work include rust removal, recoating and over-coating of the assets needing attention. The areas involved in this phase of the work are the Centrifuge Thickening Building basement, Sludge Pit Area, Tunnels C, D, G, H, I, L and N, Pump and Blower Building, Grit Removal Building, Preaeration Building, Generator Building, Flushing Water Pump Station, and the Chlorine Contact Tanks.

C. PROJECT COSTS

Columbus has applied to Ohio EPA's Water Pollution Control Loan Fund (WPCLF) for a low interest loan to finance Phase 3 of its Corrosion Prevention and Protection Program at the Jackson Pike WWTP, which is anticipated to cost \$2,661,000. WPCLF financing is currently scheduled to

be approved on December 8, 2016. At an interest rate of 1.55% for 20 years, Columbus will save an estimated \$388,436 by using the WPCLF compared to a market rate loan.

D. AFFORDABILITY CRITERIA

Existing Sewer Rates	\$491.48/yr. \$40.95/mo.	Average sewer rates for Columbus residential users in effect prior to project implementation
Sewer Rate Increases to repay WPCLF loan	None	Existing sewer rates are sufficient to repay the WPCLF loan
Community MHI	\$44,072	Based on American Community Survey of 2012-2013
Percent of MHI	1.11%	Percent of Columbus' MHI necessary to pay the annual sewer rate after any increases

In general, projects for which sewer rates are less than 1.5% of the median household income (MHI) are considered affordable.

E. PUBLIC AND GOVERNMENT OVERSIGHT

ColumbusCity Council passed Ordinance No. 2241-2015 authorizing the city to sign the WPCLF application with Ohio EPA. Ordinance No. 2698-2015 was passed on November 23, 2015 authorizing rates and/or tap in fees. The public has the opportunity to review legislation approving funds prior to City Council meetings, which are held on Mondays at 5:00 pm in City Hall. All meetings are open to the public. Columbus will also post this LER to its webpage at <https://www.columbus.gov/Templates/Detail.aspx?id=2147489898>

Additionally, as part of its State Environmental Review Process, Ohio EPA will post this Environmental Assessment to the Division of Environmental and Financial Assistance's (DEFA) web page located at: <http://epa.ohio.gov/defa/ofa.aspx> (WPCLF Documents for Review and Comment). Ohio EPA is unaware of any public opposition to the project.

F. SCHEDULE

Advertise for bids	September 2016
Award contract	October 2016
WPCLF Loan Award	December 8, 2016
Begin Project	January 2017
Complete Project	January 2018

G. LER CRITERIA REVIEW

This project meets the general project type criteria for a Limited Environmental Review; namely, it is a minor upgrade of an existing treatment facility. It also meets the following specific LER criteria:

1. Will this project have the potential to result in significant adverse environmental impact?

Impact Type	Significant?		If yes, provide a brief description
	Yes	No	
Air Quality	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No air discharges associated with this project
Archeological or historic resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Project located within previously-disturbed WWTP area

Coastal zones	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Project not located in coastal zone
Federal and State T&E species	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No T/E species habitat present within boundary of existing WWTP
Farmland Protection	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No farmland present within boundary of existing WWTP
Fish and wildlife	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No fish and wildlife habitat present within boundary of existing WWTP
Floodplains	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Project work will not alter existing floodplains in any way
Ground water resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No ground water resources located within boundary of existing WWTP
Safety	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No special issues of concern
Safe drinking water	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Project located outside sole source aquifer recharge zone
Surface water resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Project will not directly alter nearby surface water or create sediment runoff impacts to it
Terrestrial habitat	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No trees or other terrestrial habitat present within boundary of existing WWTP
Wetlands	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No wetlands present at the project site
Wild and scenic rivers	<input type="checkbox"/>	<input checked="" type="checkbox"/>	None located in project area

2. Will this project require extensive impact mitigation unique to the assistance proposal?

Description of extensive or unique mitigation that will be required.	Yes	No
No special mitigation required, due to the nature of the work and the project location.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3. Will the project adversely affect a high quality environmental resource?

Description of high quality environmental resources	Yes	No
None are present. All work will occur on/within existing buildings at the Jackson Pike WWTP	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4. Is the project a controversial action?

Is this project the subject of significant public interest?	Yes	No
DEFA is unaware of any public controversy regarding this project. There is no potential for significant impacts to nearby residences, and the projected 2019 city sewer rate increases fall within affordability criteria.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

5. Is the project cost-effective?

Cost effectiveness	Yes	No
This project will extend the useful life of existing equipment within the WWTP without significant capital expenditure on new/replacement equipment and facilities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

6. New or relocated discharges

Will this project create a new, or relocate an existing, discharge to surface or ground waters, or cause pollution of surface or ground waters, 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, or provide capacity to serve a population substantially greater than the existing population?	Yes	No
This project involves recoating of existing WWTP structures and equipment, without any functional change to equipment or processes that could affect treatment capacity, flow, or discharge.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

H. BASIS FOR FINAL FINDING OF NO SIGNIFICANT IMPACT

Based upon the available planning information for this project and the materials presented within this Limited Environmental Review, Ohio EPA concludes that the proposed project will not result in any significant adverse impacts to any environmental features. Work associated with this project is limited to the removal of rust and the coating and over-coating of existing WWTP assets. The project will occur entirely within the boundaries of the existing WWTP, and will not result in any ground disturbing activity. The project will extend the useful life of existing WWTP assets, helping the facility to maintain compliance with its discharge permit and thus protect water quality.

I. QUESTIONS AND COMMENTS

For further information regarding the project presented in this LER, please contact:

Thomas Harcarik
Ohio EPA
Division of Environmental & Financial Assistance
P.O. Box 1049
Columbus, Ohio 43216-1049

Figure 1. Location of Jackson Pike WWTP

