



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

June 21, 2018

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

**Northwestern Water and Sewer District
Hancock County**

**McComb Finished Water Clearwell Improvements HAB
Loan Number FS391432-0142**

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,



Jerry Rouch, Assistant Chief
Division of Environmental & Financial Assistance

Attachment

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

**McComb Finished Water Clearwell Improvements HAB
Loan Number FS391432-0142**

**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) owns and operates the water distribution system that serves urban and rural customers in large portions of Wood County, as well as sections of Hancock, Sandusky, Ottawa and Seneca counties, through approximately 440 miles of water lines. NWWSD also owns and operates two ground storage tanks, eight elevated storage tanks, and seven booster pumping stations. NWWSD assumed control over the McComb water treatment and distribution systems in 2016. The McComb service area, located in Hancock County, has a population of approximately 1,650. This service area is provided water by NWWSD's McComb Water Treatment Plant (WTP), which has an approved capacity of 0.452 million gallons per day (MGD) or 315 gallons per minute (GPM) and draws its water from Rader Creek. The total cost of the McComb Finished Water Clearwell Improvements HAB project, here forward referred to as the McComb Clearwell project, is \$1,297,000, with construction scheduled to begin August, 2018 and to be completed in ten months.

NWWSD continually reviews potential projects to improve service, water quality, and reliability throughout its service areas. Their current Capital Improvement Plan (CIP) includes water main rehabilitation/replacement projects, maintenance to existing tanks (including adding mixers or aerators to improve water quality) and booster pumping stations, and waterline extensions to reduce the number of dead ends in the system to improve water quality throughout NWWSD's facilities. The McComb service area has an existing 500,000-gallon clearwell which was constructed in 1984. However, the clearwell requires extensive maintenance and cannot be taken out of service for these repairs without other means of water storage. The McComb Clearwell project will include construction of a new 500,000-gallon clearwell to provide redundancy for finished water storage, allowing for repairs to the existing clearwell to take place at a later date.

There are no immediate projects planned for the McComb service area for service extension, pump stations, or new elevated tanks. NWWSD is not aware of any large developer projects in these areas that will include subdivisions and new demand for water, and there are no known areas within the McComb service area that are working on petitions for water. The service area population is projected to remain stable or decrease, and therefore the proposed project is not expected to have impacts on the existing water demands. Given the low to negative projected growth in demand and the adequate water supply, NWWSD can provide water to the expected 20-year service population without additional major infrastructure improvements.

The Ohio Water Supply Revolving Loan Account (WSRLA) is targeting funding toward the planning, design and construction of infrastructure improvements at surface water treatment plants to address harmful algal blooms (HAB). Cyanobacteria (also known as blue-green algae) are microscopic organisms found naturally in surface water that can sometimes multiply to form HAB. HAB can be harmful to the environment, animals and human health, and can pose treatment challenges for public water systems, including

taste and odor and shortened filter run times. At their worst, HAB may generate toxic chemicals capable of affecting the liver, nervous system and/or skin. The McComb Clearwell project is eligible for a zero percent interest rate HAB discount.

Alternatives

An evaluation of alternatives to address the project area needs includes:

Alternative 1: No-Action

Due to the condition of the existing deteriorated clearwell and its need for timely repair with storage redundancy, as well as the potential for issues related to HAB, the No-Action alternative of continuing with the current situation is not a feasible option.

Alternative 2: Construction of a new 500,000-gallon clearwell. This alternative includes new piping and valving, as well as a new control system.

Selected Alternative

Alternative 2 was chosen for this project as it provides redundancy for finished water storage to maintain flows for drinking water and for fire protection, as well as allowing for repairs to the existing clearwell to take place at a later date. This project also allows NWWSD to make improvements to minimize the potential effects related to HAB.

The McComb Clearwell project includes: construction of a 500,000-gallon glass lined clearwell, tank appurtenances and piping, two floating aerators, floating mixer, submersible mixer, air exchange units, piping and valving, new electrical service, telemetry controls, and site restoration.

Implementation

The total cost of the McComb Clearwell project is \$1,297,000. NWWSD proposes to borrow the entire project amount from the Ohio Water Supply Revolving Loan Account (WSRLA). The project qualifies for the zero percent interest rate HAB discount. Borrowing at zero percent will save NWWSD approximately \$501,000 over the life of the loan compared to the current market rate of 3.4 percent.

Debt for the project will be repaid from monthly service fees. Under the water rates that are effective in 2018, and based on the average usage of 3,300 gallons of water per month, the average residential water bill is \$58.47 per month, or \$702 per year. This represents 1.55 percent of the local median household income (MHI) of \$45,368, which is considered affordable. NWWSD has had to raise rates in the McComb service area to repay pre-existing debt and allow for investment in the significant capital needs of the drinking water and wastewater systems. NWWSD has absorbed a portion of the McComb service area's debt among its large customer base to defray additional expenses to the McComb service area. By assisting the McComb service area with its debt and arranging

for a zero percent loan for this project, NWWSD has minimized McComb service area's expenses related to this project. NWWSD is anticipating a July, 2018 WSRLA loan, with construction scheduled to begin August, 2018 and to be completed in ten months.

Public Participation

NWWSD will send the affected residents a letter explaining the project. In addition, NWWSD has discussed the project at board meetings that were open to the public, and project information is present on NWWSD's website. Given the limited potential environmental impact of the project, the lack of a rate increase and the lack of property assessments, this is considered adequate public participation.

Conclusion

The proposed project is of a general project type (minor modifications to an existing water treatment plant) that qualifies for a Limited Environmental Review. Specifically, it meets the following criteria:

It will have no significant adverse environmental effect: Construction will be limited to the existing WTP property which has experienced extensive prior disturbance related to construction of WTP structures, railroad borrow material, paved roads and utilities.

It will not affect any special resource type: No high-quality resources are located in the paths of construction for this project.

It will not require specific impact mitigation: The specifications include construction best management practices to control noise, dust, odors and sedimentation, and prohibitions against placing excess excavated material in streams, 100-year floodplains, and wetlands. Given the minimal scope of this project, this is considered adequate.

It is clearly cost-effective. The option of doing nothing would leave unacceptable risks in place related to drinking water quality and maintenance of existing structures.

It is not controversial. It is affordable and, provided the construction best management practices and prohibitions on excess excavated material are followed, will have no adverse environmental impacts.

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, create a new source of water withdrawals from either surface or ground waters, or significantly increase the amount of water withdrawn from existing sources; or provide capacity to serve a design population substantially greater (thirty percent) than the current design population. No discharge points or pollutant loading will be part of the project. The project does not require the expansion of McComb's water treatment facility beyond

its current capacity or require the addition of a supplementary water supplier, so it will not require a change in water withdrawal. Zero to negative population change is anticipated over the 20-year planning period.

The planning activities for the proposed project have identified no potentially significant short-term or long-term adverse impacts to the quality of the human environment or to 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). The project is located entirely existing WTP property which has experienced extensive prior disturbance related to construction of WTP structures, railroad borrow material, paved roads, and utilities. Impacts related to dust, noise and odors will be temporary and well controlled during construction.

For further information, please contact:

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Figure 1: Project general area, in red.

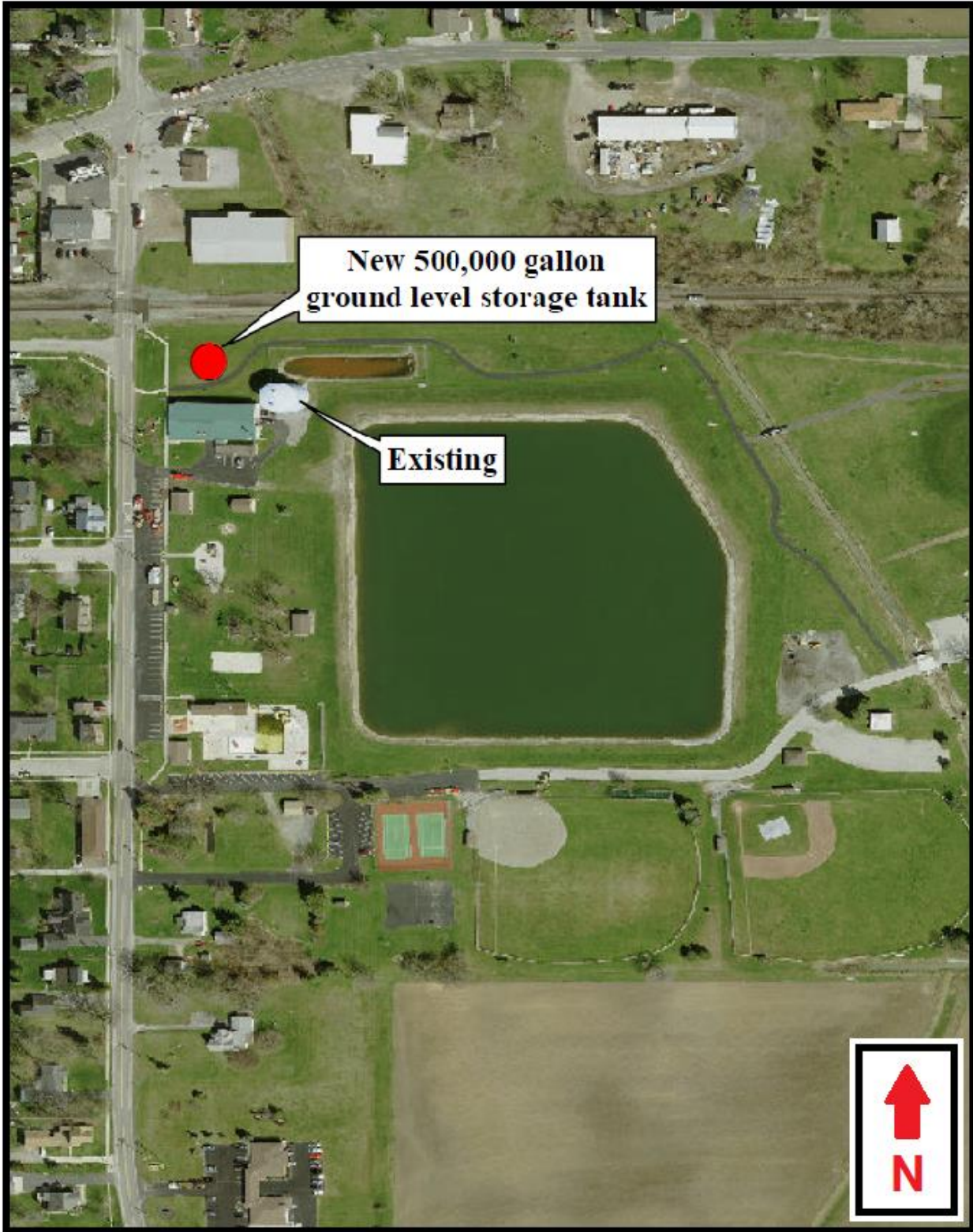


Figure 2: Project area, in red.