



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 Willoughby, Lake County, Ohio
Eastlake - Quentin Road Pump Station and Equalization Basin Project
Loan # CS390999-0021

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 sewerred community which is for minor upgrading and/or minor expansion of existing treatment works including, but not limited to, minor rehabilitation of existing facilities, infiltration and inflow correction, functional replacement of existing mechanical equipment or structures, and construction of new ancillary facilities adjacent or appurtenant to existing facilities. In particular, the City of Willoughby proposes to construct an underground equalization basin capable of storing about one million gallons of wastewater adjacent to the existing Quentin Road pump station located just south of Lake Erie in Eastlake, Ohio. When constructed, the proposed project will reduce, if not eliminate, sanitary sewer overflows and direct discharges from the Quentin Road Pump Station to Lake Erie during no greater than a 10-year, 2-hour magnitude design storm event of about 2.09 inches of rainfall in two hours. As such the City of Willoughby's proposed project constitutes an activity meeting these criteria.

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.

Maps depicting the location of the proposed project are 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,



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

JR/KH

Attachment

LIMITED ENVIRONMENTAL REVIEW (LER)

Date: November 28, 2016

A. Project Identification

Name: City of Willoughby, Lake County, Ohio
Eastlake - Quentin Road Pump Station and Equalization Basin Project

Address: The Honorable David E. Anderson
Mayor, City of Willoughby
City Hall
One Public Square
Willoughby, Ohio 44094

Water Pollution Control Loan Fund (WPCLF) Loan No.: CS390999-0021

B. Existing Need

The City of Eastlake and the City of Willoughby currently have a joint facilities agreement for the construction, operation, and maintenance of the wastewater collection and treatment systems serving these two communities. This joint agreement becomes particularly important in regard to larger wastewater facilities such as the Quentin Road pump station and the Willoughby-Eastlake Wastewater Treatment Plant (WWTP), both of which are physically located in Eastlake. Under this agreement, the City of Willoughby has primary responsibility for arranging financing for major projects affecting these wastewater components. In contrast, the two cities generally independently manage their wastewater collection systems.¹

In the currently proposed project, the City of Willoughby plans to construct improvements adjacent to the existing 4.5 million gallons per day (mgd) peak flow Quentin Road pump station. These improvements are needed to reduce/eliminate sanitary sewer overflows (SSOs) directly discharging from this facility into Lake Erie, and enable the two cities to attain compliance with the schedule in the National Pollutant Discharge Elimination System (NPDES) permit for the Willoughby-Eastlake WWTP. As noted in the city's nomination form for this project, there were seven reported instances of sanitary sewer backups in the area served by the Quentin Road sanitary sewer and pump station between 2012 and 2014. Prior to these documented cases, the March 2011 Sewer System Evaluation Study (SSES) indicated that there were thirty-two reports of sewer backups in this same general area. Sanitary sewer surcharging that causes basement backups and street flooding is also believed to be responsible for the SSOs to Lake Erie. To completely address these problems, additional, separate improvements to the Waverly Road sanitary sewer in Eastlake, Ohio are expected to be necessary. The latter project will be covered in a separate environmental review document should Eastlake decide to fund it through the WPCLF.

¹ Two other smaller communities, the villages of Timberlake and Lakeline, also contribute wastewater flows to the Willoughby-Eastlake WWTP, but their flows do not pass through the Quentin Road Pump Station.

Building on an overall infiltration/inflow (I/I)² removal strategy started in the mid-1980s and updated in 2011, Willoughby is proposing to eliminate SSOs in the project area by completing improvements at and adjacent to the Quentin Road pump station location. This project focuses on the improvements needed at the Quentin Road pump station to address both cities' responsibilities under the Clean Water Act. Figure 1 below shows the location of the cities' two proposed wastewater projects and existing facilities.

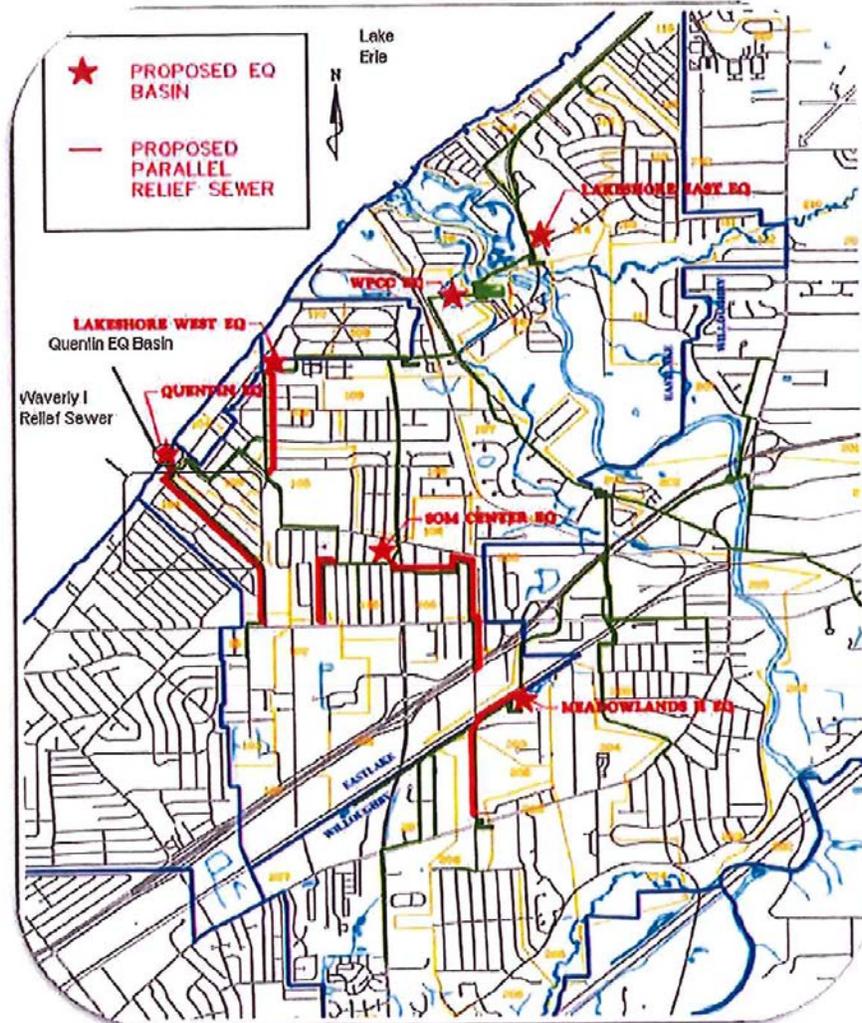


Figure 1, Wastewater Facilities in Eastlake Ohio Vicinity

² Infiltration/inflow 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. Excessive I/I can lead to SSOs, basement backups, and the other problems found in the Eastlake and Willoughby sanitary sewer systems.

Given the NPDES permit compliance schedule requirement that the Quentin Road equalization basin project be completed, the only available alternatives (no-action and sanitary sewer rehabilitation) were not considered viable. For that reason, the rest of this document will focus on the specific aspects of the proposed 6.5 mgd Quentin Road pump station and equalization basin improvements. Overall, the city’s main objective is to better serve the facilities planning area shown in Figure 2 below. Figure 2 also shows the location of Willoughby and Eastlake in relation to the facilities planning areas established in Lake County.

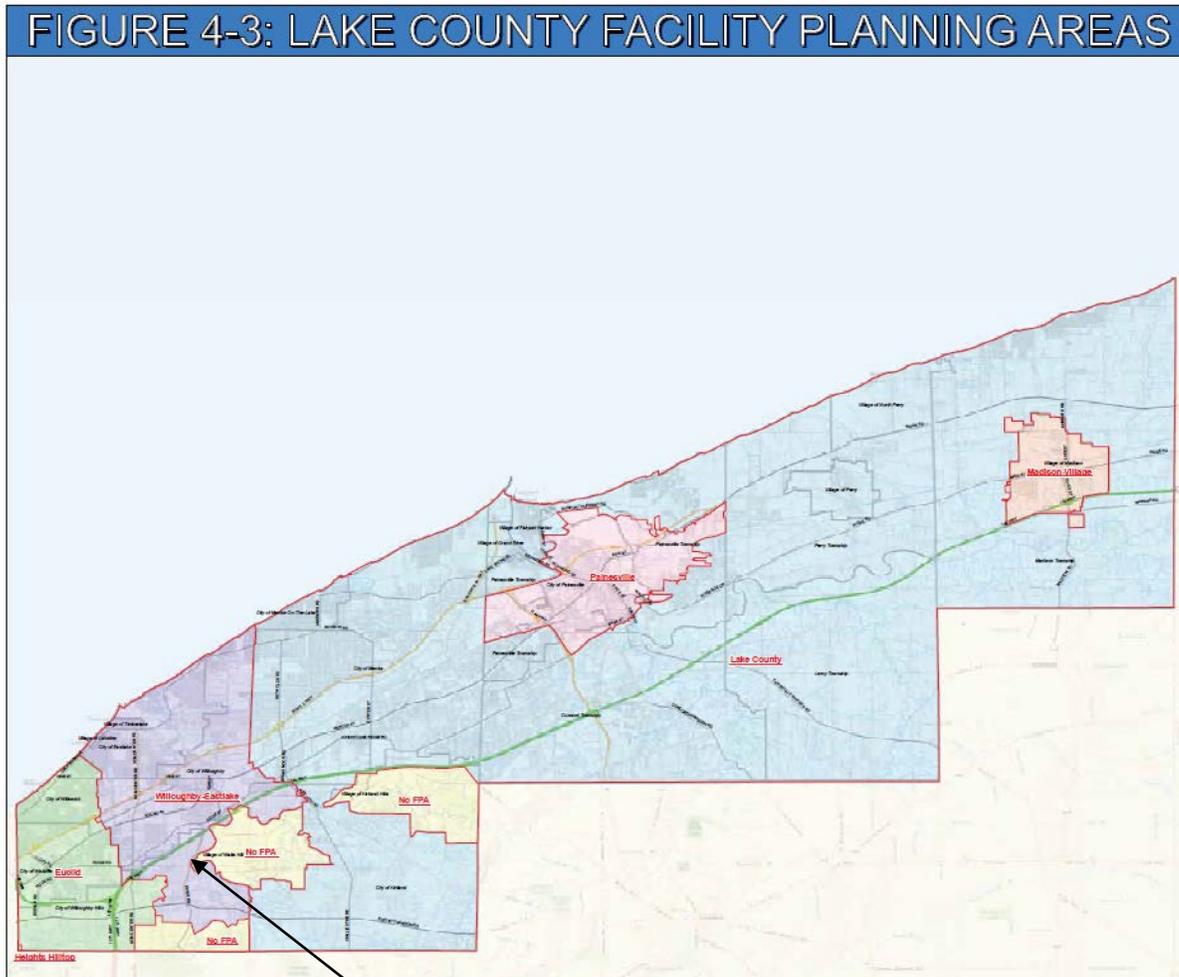


Figure 2, City of Willoughby-Eastlake WWTP’s Facilities Planning Area

C. Project Description

After completing its alternatives analysis discussed above, the city decided to make three major improvements in or adjacent to the Quentin Road Pump Station. These proposed improvements include construction of (1) an underground wastewater flow equalization basin capable of storing 1,000,000 gallons with cast in place concrete walls and floor and buried concrete roof; (2) a transfer pump station, site piping, paving, erosion/sediment

control, grading and landscaping, security fence, standby power generator, sediment flushing system, ventilation system and utility connections and relocations as required; and (3) a telemetry system, incorporated with the existing pump station communication network, as well as the new pump station equipment and level monitoring for both normal and alarm conditions. The City of Willoughby expects that the proposed project will require about nine months to complete, and will require use of four rectangular parcels of municipally-owned land facing Lakeshore Boulevard. Figure 3 below shows the location of these four parcels within a residential area of Eastlake. Of them, the middle two parcels will be used for construction of the equalization basin, while the outer two will be used for access to the construction site and storage of supplies and equipment during construction.

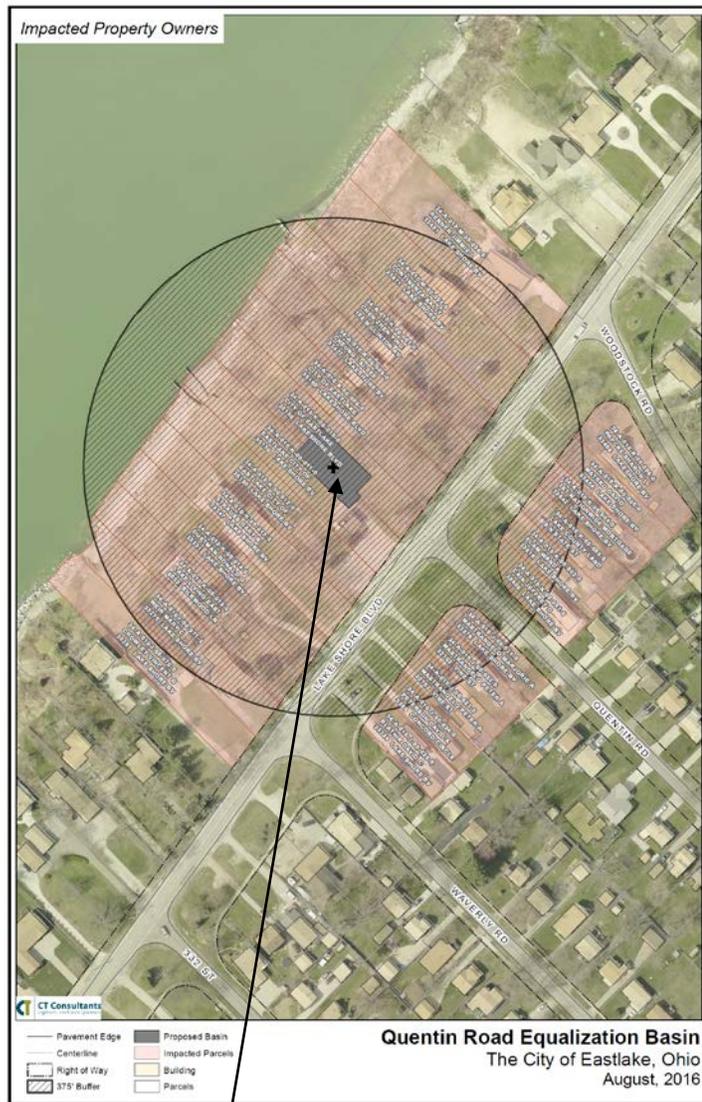


Figure 3, Project Location Showing Affected Parcels

According to the city, these improvements to its wastewater facilities are meant to handle the city's existing and expected 20-year wastewater needs in the facilities planning area shown earlier in Figure 2.

All of the proposed wastewater improvements that are the subject of this document will be made within prior disturbed areas where the main vegetation consists of lawns, large trees, and conventional landscaping typical of suburban areas (see Figure 4 below). By completing this proposed project, Willoughby and Eastlake expect to have a more reliable means of handling its wet weather flows originating within its collection system leading to the Quentin Road pump station. In turn, this should also help reduce, if not eliminate, SSOs in the collection system and bypassing through storm sewers to Lake Erie. Restoring the project area to its original (or better) condition is an additional component of this proposed project.

Prior to bidding this proposed project, Willoughby's engineering consultants estimated the total construction cost to be about \$5.18 million, and the total project cost to be \$5.86 million. Readers should note that the difference between these two figures (about \$680,000 in planning and design costs, property acquisition, and loan fees) will be covered by the two cities of Willoughby and Eastlake on a 50/50 basis, as specified in their joint agreement. A standard interest rate WPCLF loan (currently 1.55%) will cover the total construction costs. This interest rate will be available for loans awarded through December 31, 2016.



Figure 4, Aerial Photo of Project Site

D. Limited Environmental Review (LER) Criteria

Because the proposed project meets certain minimum conditions, and will not individually, cumulatively over time, or in conjunction with other federal, state, or private actions have a significant adverse effect on the quality of the human environment, a LER is warranted. More specifically, these conditions cover actions in sewerred communities that are for minor upgrading and/or minor expansion of existing wastewater treatment works, I/I correction,

functional replacement of existing mechanical equipment or structures, and construction of new ancillary facilities adjacent or appurtenant to existing facilities. In this instance, all of the proposed work will occur within the existing pump station site or immediately adjacent to it at the property the city acquired for that purpose. As all of the proposed improvements will be limited to previously-disturbed locations, the proposed nine-month long construction period for this project in Eastlake is expected to result in no short- or long-term adverse environmental impacts. Please also refer to Figure 5 below for more details.

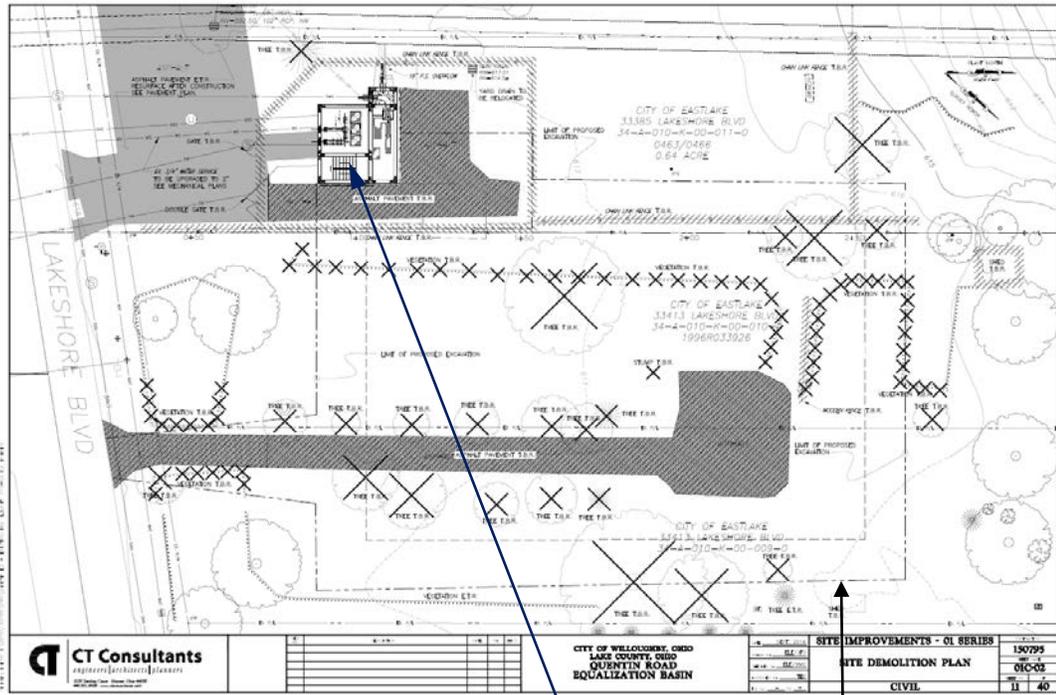


Figure 5, Site Layout showing New Transfer Pump Station, Proposed Equalization Basin, and Demolition Work (Including Tree Removal)

The proposed project meets the following, specific criteria for a LER:

1. **The proposed project has no potential for associated significant adverse environmental impacts and will have no effect on high value environmental resources.** Given the proposed project’s limited scope, placement within a previously-disturbed location within an urbanized area, and the absence of any notable above-ground natural features within the immediate project area shown in Figures 1-5, the proposed project will not result in any adverse environmental impacts. This conclusion is validated by the reviews completed by Ohio EPA and federal, state, and other governmental agencies. The known project area features and the city’s approach to addressing them are discussed in more detail below.

The city’s consulting engineers and Ohio EPA staff consulted with the Ohio Department of Natural Resources (ODNR), particularly the Ohio Coastal Management Program staff, during the project review and together determined that the proposed project will have no effect on important natural resources, such as coastal areas, floodplains, or other natural features. This conclusion was reached

primarily because, while the existing Quentin Road pump station and proposed equalization basin site is located within the coastal review area, none of the proposed improvements or construction activities will encroach significantly onto the more environmentally sensitive shoreline areas. In addition, of the trees selected for removal (see Figure 5), the majority appear to have been planted as part of a conventional (linear), residential landscaping activity and not to be native plants that grew naturally in this location. Accordingly, the city's proposed impact mitigation assurances in the detail plans and specifications should address these concerns during the relevant nine-month construction period. As a result, no significant adverse environmental effects will occur because either significant natural features are generally absent from the project area, or specific provisions to minimize construction-related impacts to the project's setting are included in the project's contract documents.

- 2. The proposed project will not require extensive impact mitigation unique to the assistance proposals.** The proposed work to complete this project is straightforward and does not require extensive mitigation of environmental impacts, as all of the pump station and equalization basin improvements will be made within a previously-disturbed, residential area (see Figures 1-5 above). In that regard, however, the city estimates that a large number of trucks (over 1,200 trips moving 11,000 cubic yards) will be needed to perform the earth-moving activity necessary during this project. Nonetheless, only routine environmental impact mitigation in the form of standard soil erosion and sedimentation controls, spill control, dust control, vehicle emission and traffic controls, and adherence to prohibited construction activities included in the project's detail plans is expected to be needed. To address potential Ohio EPA concerns about dumping of excess material excavated during construction activities, only spoil disposal sites prior-approved by Ohio EPA may be used. This requirement is to avoid any significant adverse off-site impacts such as from any placement of excavated material or other fill in sensitive areas, such as wetlands, floodplains, or beach habitat not previously approved by Ohio EPA for that purpose.
- 3. The proposed project is cost-effective and not the subject of significant public interest.** In comparison to the no-action and sanitary sewer rehabilitation alternatives considered during project planning, the proposed project offers the only viable, lowest cost option available to Willoughby, and so it was selected as the more cost-effective option on the basis of both a monetary ratio³ and non-monetary factors. Moreover, the proposed improvements constituting this project are non-controversial because they will not adversely impact the environment or the rates paid for wastewater in the facilities planning area. Please see the Project Implementation (Section E) and the Estimated Project Costs and Proposed Project Schedule (Section F) parts of this document following this section. Information on the city's public participation activities is presented below.

³ The March 2011 SSES (Pages 4-18 and 4-19) explains that this ratio is the relationship between the costs to perform sewer rehabilitation and the aggregate costs savings resulting from the rehabilitation work in terms of potentially smaller-sized sewer projects and lower wastewater treatment costs.

4. **The proposed project will not create a new, or relocate an existing, discharge to surface or ground waters, or cause pollution of surface or ground waters. It will also not create a new source of water withdrawals from either surface or ground waters, or significantly increase the amount of water withdrawn from an existing water source.** The proposed project will not result in either new, relocated, or additional discharges of wastewater to either surface or ground water on a permanent basis. Rather, the purpose of this proposed project is to assure that wastewater which currently is periodically released to the environment without treatment reaches the Willoughby-Eastlake WWTP. Part of the reason for this finding is that the proposed project will improve the operation of the Quentin Road pump station.

Significantly, no changes in the existing NPDES permit covering the Willoughby-Eastlake WWTP, its effluent outfall location, or a discharge of additional pollutants to local surface water resources through population growth are expected in response to this project.

Similarly, the fact that this project involves making improvements designed to meet current engineering standards and the city's 20-year needs also supports our conclusion that this project does not involve creation of a new, or support expansion of an existing, source of water withdrawn from either surface or ground waters.

5. **The proposed project 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.** As noted above, the proposed improvements to the Quentin Road pump station are not designed to facilitate future growth in or around the city, but rather to address the two cities' regulatory responsibilities under the Clean Water Act. On this basis, the proposed project will not result in any net increase in the volume of discharge or the loading of pollutants from the Willoughby-Eastlake WWTP and its collection system, or permitted to be discharged under the NPDES permit. Rather, flows which currently are bypassed or overflow to waterways or private property through SSOs will be properly handled and discharged.
6. **The proposed project will not provide capacity to serve a population substantially greater than the existing population.** Based on information provided by the city during planning, Willoughby and vicinity (see Figure 2) are expected to experience minor increases in population over the next fifteen to twenty years. According to the regional water quality agency for Lake County, the Northeast Ohio Areawide Coordinating Agency (NOACA), Willoughby's and Eastlake's populations are expected to increase by about 600 people during this interval, while the populations for other areas contributing flow to the Willoughby-Eastlake WWTP are not expected to increase significantly. In addition, the main purposes of this project are to replace pump station components which have come to the end of their useful life and to address peak, wet weather flow conditions, not future growth. On this basis, the proposed project and the population it is expected to support should have no effect on environmental attributes that are typically affected by growing populations. For example, it will not adversely affect the full

attainment status of Lake County for the four out of the six priority air pollutants. Given the impetus for this project, it should have no adverse effect on either of the two priority air pollutants (ozone and sulfur dioxide levels) for which Lake County is currently in non-attainment.

E. Project Implementation

To implement the proposed project described above, the City of Willoughby intends to finance the improvements to the Quentin Road pump station and the adjacent new equalization basin through a low-interest loan from Ohio EPA's WPCLF. Currently, the WPCLF standard interest rate is 1.55%. Prior to loan award, this fixed interest rate is adjusted monthly to reflect changing market conditions.

Given the information included in the City of Willoughby's fact sheet on this proposed project, no sewer service charge rate increases related directly to paying for the new debt service on these improvements are expected during the next few years. Rather, the city expects that any necessary increases in sewer rates will occur only to address increases in the costs to operate, maintain, and replace its collection and treatment systems. To summarize, the four communities contributing wastewater flows to the Willoughby-Eastlake WWTP currently have joint agreements to allocate costs among them. This cost allocation results in City of Willoughby residents paying about \$277.20 per year, on average, for wastewater services. This figure is based on a current cost per 100 cubic feet (ccf) of \$3.65 per ccf plus an annual residential charge of \$29 per year, and an annual usage of 68 ccf. Eastlake residents, in contrast, pay about \$245.76 per year, while residents in Timberlake and Lakeline pay \$236.80 and \$254.84 respectively.

Assuming the project funding presented above, Ohio EPA expects that the city will save between \$547,000 and \$756,000 when compared to a market-rate loan of 2.80% on the total, as-bid construction project costs of \$3.75 million. By proposing to fund their project in this way, Ohio EPA anticipates that the Cities of Willoughby and Eastlake should be able to generate enough revenue under its current and proposed wastewater rate structure to continue to own, operate, and maintain its wastewater collection and treatment systems well into the future.

F. Estimated Project Costs and Proposed Project Schedule

Currently, the total as-bid project cost of the proposed WWTP improvements described above is \$3.75 million. To pay for these improvements and related planning, design, and inspection costs, Willoughby expects to utilize a 20-year, standard interest-rate loan from Ohio EPA's WPCLF program (currently available at 1.55%).

Under the wastewater rates currently in effect in Willoughby in November 2016, a typical, in-city residential customer using on average 17 ccf of water per quarter currently pays a fee of \$69.30, or about \$277 a year. When expressed as a percentage of the city's latest median household income (MHI) figure of \$51,864, these annual fees are about 0.53% of the city's 2010-2014 MHI, and thus are considered to be generally affordable for an average residential wastewater customer of Willoughby. As noted earlier, wastewater rates are expected to continue to increase following the city's planned schedule over the next 20

years to cover the costs of expected increases in OM&R costs. Given the financial information presented above, no significant adverse economic impacts on the local residential users of the Willoughby-Eastlake treatment works are anticipated from this project as the increase in annual debt service is not what is behind the expected rate increases, but rather the increase in OM&R.

Under the city's proposed project schedule, WPCLF funds are expected to be awarded in December 2016, so that construction can commence soon thereafter. The city estimates that construction will be completed in nine months.

G. Public Participation and Notice

According to the city, the public was provided with two opportunities to learn more about this proposed project at the Quentin Road facility. The first was a public meeting held on September 15, 2016 during which the City of Willoughby engineering consultants presented information on the overall project. The second opportunity occurred concurrently with the public meeting in the form of a project fact sheet that was made available to the public at the meeting and through postings in city offices and the web sites of the four communities that contribute wastewater flows to the Willoughby-Eastlake WWTP. As well, both Willoughby and Eastlake through its joint wastewater committee did hold other meetings on the proposed project and its funding in prior years, which have been open to the public.

On this basis, and the limited scope of the project covered by this document, Ohio EPA has determined that no additional public review and comment on the proposed project is necessary. All potentially-interested parties (two interested residents attended the public meeting and several others communicated their questions to city officials by phone) were given adequate opportunity to review and comment on this project and its costs, and their comments were addressed by officials from Willoughby and Eastlake. These comments focused on the location of the equalization basin in relation to the lakeshore, the existing city park, and homes in the vicinity of the project; erosion rates at the proposed project site and a reply from the geotechnical firm reviewing the project; the roles of the ODNR coastal management program and Ohio EPA in review of the proposed project; how the costs of future erosion of the site would be covered (if needed); how the two other communities in the WWTP service area (Lakeline and Timberlake) are paying for the project; the potential for odors; the effect of the proposed project on views of the lake; the depth of the basin; and how the new structure would be screened from view by new shrubs or trees.

Additional information that supports this decision to issue an LER is available for public inspection upon request at the City of Willoughby's main office located at City Hall, One Public Square in Willoughby, Ohio 44094. Alternatively, interested readers can also contact Jim Sayles at 440-530-2348 if they have any specific project questions.

H. Interagency Coordination

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

NOACA
Ohio EPA
United States (U.S.) Fish and Wildlife Service

Ohio Department of Natural Resources
State (Ohio) Historic Preservation Office

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 identified no potentially-significant, direct, indirect, or cumulative adverse impacts. 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 air quality, floodplains, wetlands, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, or threatened or endangered species. The City of Willoughby's proposed Quentin Road equalization basin and pump station improvements project will enable the cities of Eastlake and Willoughby to address their regulatory responsibilities under the Clean Water Act -- especially those related to SSOs, and excessive I/I conditions that prompted the cities to initiate the proposed project. Public health risks associated with potential exposure to untreated sewage in the project areas will also be reduced. In particular, the result will be the elimination of overflow events to Lake Erie, streets, and basements from the Quentin Road Pump Station in all storms up to and including the 10-year, 2-hour design storm.

J. For further information, please contact:

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