June 14, 2019

Mr. Joseph Stallard, Mayor
Village of Butler
33 West Elm Street
Butler, Ohio 44822

Re: Village of Butler
    Butler Regional Wastewater Treatment Plant
    Loan Number: CS90211-0011
    Finding of No Significant Impact

Dear Mayor Stallard:

On May 6, 2019, Ohio EPA issued a draft Finding of No Significant Impact (FNSI) for the Village of Butler – Regional Wastewater Treatment Plant project for public review and comment. The thirty-day period for comments has passed and no comments have been received. Therefore, the conclusions contained in that draft FNSI become the basis for this final Finding of No Significant Impact for the above referenced project.

This final Finding of No Significant Impact may be revised or rescinded at a future date based upon either changes to the proposed project, the presentation of information which significantly alters earlier conclusions, or failure of the applicant to perform the environmental mitigation prescribed in the draft Environmental Assessment.

Sincerely,

Jonathan Bernstein, Assistant Chief
Division of Environmental and Financial Assistance
ENVIRONMENTAL ASSESSMENT

Project Identification

Project: Village of Butler
Butler Regional Wastewater Treatment Plant

Applicant: Mr. Joseph Stallard, Mayor
Village of Butler
33 West Elm Street
Butler, Ohio 44822

WPCLF Loan Number: CS390211-0011

Project Summary

The Village of Butler, located in Worthington Township, Richland County, has applied to Ohio EPA, Division of Environmental and Financial Assistance (DEFA) for financial assistance from the Water Pollution Control Loan Fund (WPCLF) to fund the construction of a new, regional wastewater treatment plant (WWTP) for the Villages of Butler and Bellville. The project includes a new force main, new gravity sewer, new pumping stations, demolition of four existing, failing wastewater treatment plants and the elimination of one gray water system. This project will eliminate five pollution sources to the Clear Fork Mohican River, it eliminates E. Coli contamination to the area aquifer and the associated drinking water supply for the surrounding communities and it will allow the Village of Butler to achieve compliance with its National Pollutant Discharge Elimination System (NPDES) permit.

The WPCLF program requires that a comprehensive environmental review be completed prior to the award of financial assistance. This Environmental Assessment (EA) describes the project, the planning and analysis that were performed prior to the design and the potential for adverse environmental impacts during construction. Ohio EPA's environmental review has concluded that the proposed project will not result in significant adverse environmental impacts. More detail follows in the sections below.

Ohio EPA anticipates awarding a WPCLF loan to the Village of Butler for the Butler Regional Wastewater Treatment Plant project in June 2019. Construction of the project will begin soon after loan award and be completed within approximately 12 months. See the figures below for a project location map (Figure 1), a Butler Regional WWTP location map (Figure 2) and a WWTP project detail map (Figure 3).

Background and Existing Conditions

Butler owns and operates a wastewater collection and treatment system. The original system was installed in 1946 and received major improvements in 1982. The Ohio EPA issued Director's Final Findings and Orders in April 2015 because the Village was in significant non-compliance of its NPDES permit due to two factors: an aging and outdated wastewater treatment plant and severe infiltration and inflow (I&I) in the collection system. Infiltration and inflow are terms used to
Figure 1: Project Location Map
Figure 2: Butler Regional WWTP Project Location Map
describe the ways that groundwater and stormwater enter the sanitary sewer system. Infiltration is groundwater that enters the sewer system through leaks in pipes. Inflow is water that finds its way into the sewer system through improper connections. The Village completed a rehabilitation project in 2015 to reduce I&I. The project included cured-in-place pipe (CIPP) lining of approximately 8,400 linear feet of pipe, replacement of approximately 400 linear feet of sewers and the installation of a new 8-inch diameter influent pipe to the existing WWTP.

The 120,000 gallons per day (GPD) average design flow of the plant’s treatment process is negatively impacted by its outdated technology and the age of its existing equipment, as the plant is unable to meet its NPDES permit limits. The influent wastewater flow to the plant is conveyed by a siphon under Smoky Run, which is problematic; the 37,500-gallon equalization tank is insufficient for the plant’s sanitary flows; the headworks sewage grinder is inoperable; the original treatment Imhoff tank is being utilized for waste sludge storage; the primary clarifier’s depth is too shallow - its capacity does not meet flow requirements for the average daily flow (ADF) or the peak daily flow; the clarifiers’ valves, structural steel and electrical enclosures are corroded; the rotating biological contactors (RBCs) are insufficient to properly treat the flows and the existing fiberglass covers are cracked, broken and are not secured to the RBCs; and the final clarifiers consist of two 16-foot diameter peripheral feed units, each with a depth that is less than the recommended minimum side water depth of 10 feet following biological reactors. Shallow side water depth allows solids to be easily washed out of the secondary clarifiers in high flow periods, which results in permit violations. The ultraviolet disinfection was recently installed under the I&I rehabilitation project. The aerobic digesters are in good condition; however, the digested sludge pumps are inoperable. A hired contractor removes waste sludge and transports it offsite for disposal.

As part of the I&I rehabilitation project of 2015, a new Parshall flume flow meter was installed at the effluent end of the WWTP. ADF data was then recorded and was used to evaluate and properly size the new WWTP. In addition to the flow monitoring data, the plant was modeled through Sewer Gems Bently software to estimate the amount of tankage needed for equalization.

The Village of Bellville constructed their wastewater treatment plant in 1971. The plant is currently in significant noncompliance status with Ohio EPA. Since 2007, there have been 35 letters written to the Village identifying notices of violation of permitting limits as established in the Village’s NPDES permit. Therefore, to avoid Ohio EPA elevating the situation to Director’s Final Findings and Orders; to address a long history of offensive odors emanating from the WWTP that have negatively impacted residents, elementary school students and youth leagues whose playing fields are adjacent to the WWTP; to address the location of the existing WWTP in the floodway and obstacle for the community’s newly constructed school; and to address the need to individually replace the WWTP to meet anticipated treatment limits, the Village of Bellville began working with the Village of Butler to design a regional WWTP to meet the needs of both villages.

Two additional, nearby, failing WWTPs have needed repair or replacement: Clear Fork High School WWTP, located at 987 SR 97 East and the Clear Fork Mobile Home Park WWTP, located at 1260 SR 97. The high school plant is approaching the end of its 20-year useful life and has received 15 notices of violation of its NPDES permitting limits since 2008. The mobile home park plant is currently under Ohio EPA Director’s Final Findings and Orders; the unit discharges into failing lagoons and has received 54 notices of violation of its NPDES permitting limits since 2007. In a settlement with Ohio EPA, Ashford-Mansfield LLC of New York agreed to make improvements to correct numerous violations in the operations of the mobile home park’s wastewater treatment system.
The Village of Butler took several years to locate a site for the new WWTP. Each time the Village identified a potential site, an issue or issues arose that prevented the Village from moving forward. But because the Village listened to its residents, it was able to select a location that presents the least amount of environmental impacts and is most publicly acceptable.

The final solution was realized this past summer: a regionalized wastewater treatment plant to be owned and operated by the Village of Butler that will eliminate the four old, failing wastewater treatment systems and one gray water system in the area. The regionalized WWTP will be designed to Best Available Demonstrated Control Technology (BADCT) Standards to reduce nutrients from the Clear Fork Mohican River.

The current population estimate is 966 residents within Butler’s corporation limits and the current population estimate is 1,920 residents within Bellville’s corporation limits.

Discussion of Alternatives

Butler’s existing WWTP is an aging, undersized and operationally problematic system. Some of the equipment is reaching its end of service life and the existing process needs to be rehabilitated or replaced. Four alternatives were initially considered for a new type of plant specifically for the Village of Butler:

a. Improvements to the Existing Treatment Plant

This alternative includes a new influent wet well, pump station and force main; an additional equalization tank; new equalization blower building and blowers; replacement or refurbishment of the existing blowers; two new rectangular primary clarifiers and pumping station; demolition of the existing Imhoff tank; rehabilitation/replacement of the two existing RBCs; two new RBCs; new circular secondary clarifiers; a polymer system for settling and coating the existing structures.

The primary advantage of this alternative is the operator’s familiarity with the existing treatment process; however, this alternative does not provide for any expansion to accommodate future flows and additional space necessary for the installation of a larger equalization basin is not available. This alternative would not allow the plant to meet future nitrogen and phosphorus limits and the higher cost of operation and maintenance due to the large numbers of motor-driven equipment is cost prohibitive.

b. New Sequence Batch Reactor Plant

This alternative consists of the construction of a sequence batch reactor (SBR) treatment system. The SBR process operates under the fill-and-draw principle – it cycles wastewater through the fill, react, settle, draw and idle phases under continuous influent, which allows for the treatment of flow up to six times the ADF and thus reduces the amount of equalization required. This alternative would consist of the following components: screening, influent wet well & pumping station, SBR tanks, equalization tank (re-use existing plant tankage), ultraviolet (UV) light disinfection (re-use existing), flow metering, aerobic digesters and sludge storage.

Due to the space constraints at the existing site, it is necessary for the plant to relocate. The main advantage to this alternative is utilizing a single tank to provide equalization, primary clarification,
biological treatment and secondary clarification – which allows for a minimal footprint and lower capital costs. The main disadvantage of this alternative is operator unfamiliarity with the process.

c. New Oxidation Bio-Loop Plant

The oxidation ditch treatment plant alternative consists of the following: screening, influent wet well & pumping station, oxidation ditch biological-reactor, circular settling tanks and sludge pumping, UV light disinfection (re-use existing), equalization tank (re-use existing plant tankage), flow metering, aerobic digesters and sludge storage. The oxidation ditch is a concentric channel reactor, which generally includes two or three channels or rings. Flow generally enters the outermost channel and moves to the innermost. From this point, the flow discharges to the final clarifiers. Oxygen transfer and mixing is accomplished through a series of submersible mixers and fine bubble diffusers, strategically located in the channels. The oxidation ditch is joined with a pair of circular clarifiers to settle the solids in the wastewater. This option would relocate and reuse the existing UV light disinfection system. Due to the space constraints at the existing site, it is necessary for the plant to relocate.

The primary advantage of the oxidation ditch is its ability to handle a wide variety of flows. The oxidation ditch is also a proven technology that typically produces excellent quality effluent, which is partly attributable to the aeration and mixing patterns in the reactor. Oxidation ditch style plants create a flocculate sludge that settles out well. Combined with circular clarifiers, the proposed oxidation ditch system will provide a very high level of reliable treatment. The major disadvantage is the high capital cost. This option would also require structural and equipment modifications to accommodate future nitrogen and phosphorus limits.

d. New Extended Aeration Package Plant

This alternative includes the construction of a new package plant system with an extended aeration process that operates on the principal of return activated sludge. This alternative includes the following components: raw sewage screening, flow equalization tanks, aeration tank (biological reactor), settling tanks and sludge pumping, fixed media up-flow clarifiers, dosing tank, surface sand filters, UV light disinfection (re-use existing), post-aeration, flow metering and sludge storage. The WWTP tanks would be precast/post-tensioned concrete units manufactured at a factory under controlled conditions. The larger tanks, such as the aeration tank and clarifiers, would be constructed of precast modular walls with the concrete slab poured in the field.

The plant manufacturer generally provides blowers, pumps, controls panels, grating, and other miscellaneous items to complete the treatment system. Due to the space constraints at the existing site, it is necessary for the plant to relocate. This will help accommodate for any potential future customers as well as keep the existing plant online while construction is being completed.

The biggest advantage of the package treatment plant lies with the factory-made precast tanks and modular construction, which can be done at a lower cost compared to field constructed tanks. The package plant also has a small foot print and will require minimal space. Additionally, package plants can easily be upgraded and expanded by providing parallel treatment trains. The principal disadvantage is the higher cost of operation and maintenance due to the large numbers of motor-driven equipment.
Description of the Selected Alternative

The proposed location for Butler’s WWTP, as nominated in 2017, was contested in spring 2018 by a nearby resident. While evaluating solutions, Butler sought to include other failing WWTP systems in the nearby area including the Village of Bellville’s WWTP, Clear Fork High School’s WWTP, Clear Fork Mobile Home Park’s WWTP and the River Trails Crossing’s gray water system. A new regionalized WWTP is the most affordable option for all parties involved and will eliminate four sources of pollution to the Clear Fork Mohican River.

The new regional project includes:

- A new 550,000 gallon per day (GPD) Sequence Batch Reactor WWTP with a new 320,000-gallon equalization basin.
- A new pump station and 5,423 linear feet of ten-inch diameter force main for the Village of Butler;
- Demolition of Butler’s existing WWTP;
- A new pump station and 21,669 linear feet of twelve-inch diameter force main for the Village of Bellville;
- Demolition of Bellville’s existing WWTP;
- Construction of a new pump station and 5,260 linear feet of four-inch diameter force main from Clear Fork High School to the southwest corner of the mobile home park to tie into the 12-inch diameter gravity sewer;
- Demolition of Clear Fork High School’s existing WWTP;
- Construction of 7,785 linear feet of twelve-inch diameter gravity sanitary sewer from the Clear Fork Mobile Home Park and River Trails Crossing to the new regional WWTP;
- Demolition of Clear Fork Mobile Home Park’s WWTP; and
- Construction of 4,791 linear feet of new thirty-inch diameter pipe to direct the WWTP effluent to a newly constructed outfall structure to be located just upstream of Butler’s existing WWTP outfall structure.

Based on cost and ease of operation and construction, the Village elected to construct a new SBR plant at a location northwest of the existing WWTP. A pump station and force main will be constructed to pump the Village of Butler’s wastewater to the new WWTP. A pump station and force main will also be constructed to pump the Village of Bellville’s wastewater to the new WWTP. A pump station and force main will be constructed to pump wastewater from Clear Fork High School to tie into a new gravity sewer that connects Clear Fork Mobile Home Park and River Trails Crossing to the new WWTP. The four existing WWTPs and associated apparatus and piping for Butler, Bellville, Clear Fork High School and Clear Fork Mobile Home Park will be demolished.

An SBR is a type of activated sludge process for the treatment of wastewater. It is designed to operate under the fill and draw principle by cycling through the fill, react, settle, draw and idle phases under continuous influent. It operates on a timed-sequence, rather than a flow-sequence, which allows it the flexibility to treat varying ranges of flow and influent characteristics. The SBR process is designed with two treatment trains in the event maintenance is required on one of the trains. Each train has the treatment capacity for the required design flows to allow for treatment during maintenance periods.

The system will be built with the capacity to eliminate other failing, neighboring systems at the Clear Fork Mobile Home Park, Bellville, and Clear Fork High School.
The new force main for Butler will be approximately 5,423 linear feet consisting of a 10-inch diameter influent sanitary force main that will carry wastewater from the newly constructed pumping station, located at the corner of Traxler Street and Grant Street, just south of the existing plant, to the new WWTP. The existing siphon will be permanently plugged and abandoned. Approximately 101 linear feet of 8-inch diameter sanitary gravity sewer main will be installed approximately 15 feet below grade to replace the existing siphon. It will be directionally drilled at a minimum of three feet beneath Smoky Run and will extend from a new manhole, south of the pump station along Grant Street, to the new pump station.

Approximately 4,791 linear feet of 30-inch diameter pipe will extend from the new WWTP, along the north of the B&O Bikeway, across a field and discharge at a new outfall structure located in an easement area along the Clear Fork Mohican River, just north of the existing WWTP and less than 100 feet from the existing WWTP’s discharge point.

The new four-inch diameter force main will begin at the new pump station at Clear Fork High School and extend 5,260 linear feet to the southwest corner of the Clear Fork Mobile Home Park where it will tie into the 12-inch diameter gravity sewer which extends 7,785 linear feet, connecting the River Trails Crossing gray water system, to the new WWTP.

The new 14-inch diameter influent sanitary force main for Bellville will extend approximately 21,669 linear feet to carry wastewater from the newly constructed pumping station, located just south of the existing WWTP, across a field, and run to the south of SR 97 and to the north of the B&O bikeway, crossing under Greenwood Road and then to the north of and parallel to the bikeway then under the Clear Fork Mohican River to the new WWTP.

**Implementation Costs of the Proposed Project**

The total cost of the Butler Regional WWTP project is estimated to be $12,660,000. The Village is receiving a grant from Ohio Public Works Commission for $440,500. Butler qualifies for a 0% Hardship interest rate for the WPCLF loan. The actual WPCLF loan amount will be based on the as-bid costs of the project. Compared to the market interest rate (3.34 percent in April 2019), Butler will save approximately $4,630,591 in interest payments through the WPCLF.

Both the Village of Butler and the Village of Bellville operate their WWTP with user fees collected through a user charge system. In anticipation of implementing this project, the Village of Butler passed an ordinance authorizing an increase in sewer rates as of March 2018. The residential base rate increased by $6.00 in order to cover the additional costs of the debt service related to this project. A typical residential household in the Village of Butler now pays an average monthly user rate of $72.88, or $874.56 per year. When the project is complete, the average monthly user rate, and the annual user rate will remain the same. The Village of Bellville also passed an ordinance authorizing incremental increases in sewer rates as of April 2019. A typical residential household in the Village of Bellville now pays an average monthly user rate of $47.71, or $572.52 per year. Once the project is complete, the first year’s monthly user rate is projected to be $71.20, which translates into $854.40 per year.

According to the American Community Survey, the median household income (MHI) for the Village of Butler is $41,375. Therefore, the average annual sewer service charge represents about 2.1% of the MHI for the Village. This amount of household income spent on sewer service charges is above
the Ohio average of 1.14%. However, no significant adverse impact to the local economy is expected from implementation of the WWTP Replacement project.

According to the American Community Survey, the median household income (MHI) for the Village of Bellville is $48,021. Therefore, the average annual sewer service charge represents about 1.77% of the MHI for the Village. Although this amount of household income spent on sewer service charges is above the Ohio average of 1.14%; no significant adverse impact to the local economy is expected from implementation of the WWTP Replacement project.

**Proposed Project Schedule**

- WPCLF Loan Award: June 2019
- Start Construction: August 2019
- Complete Construction: April 2021

**Environmental Impacts of the Proposed Project**

A complete environmental review of the Butler Regional WWTP project was conducted, which included an extensive search and evaluation of several plant location alternatives that took several years to determine the most cost-effective, publicly-acceptable, environmentally-sound solution to meet the needs of the Villages of Butler and Bellville.

The project consists of the construction of a new, regional SBR WWTP, a pump station for the Village of Butler flows, a pump station for the Village of Bellville flows, force mains, sewer mains and the demolition of existing structures at the Village of Butler's existing WWTP, the Village of Bellville's WWTP, Clear Fork Mobile Home Park’s WWTP, and Clear Fork High School’s WWTP. Construction mitigation has been included in the detailed plans and specifications for the project to help further prevent adverse environmental impacts. More detailed information regarding potential impacts follows.

1. **Land Use**

Existing land use at the proposed WWTP site is agricultural. The new force main and sanitary sewer will be constructed primarily along State Route 97 and the Richland Baltimore and Ohio (B&O) Railway bike trail. The new pump station for Butler will be constructed in a small corner of property that is currently mowed lawn. The new pump station for Bellville will be constructed just south of the Village’s existing WWTP in a grassy area. The existing WWTPs will be demolished to grade.

2. **Major Land Forms**

No major landforms will be permanently altered by the Regional WWTP project. The construction techniques that will be utilized to install the force main and sanitary sewer include trenchless and open-cut sewer installation, and pipe “jacking.” These methods will attempt to avoid impacts and will allow a relatively easily return of ground surfaces to their pre-existing elevations. Based on the above, the proposed project will not result in a significant adverse impact to major landforms.
3. **Air Quality**

Richland County is currently in attainment with respect to carbon monoxide, lead, nitrogen dioxide, particulate matter, ozone and sulfur dioxide. During construction, the proposed project will result in a temporary increase of dust and fumes from construction activities. This will be mitigated using standard construction best management practices (BMPs), such as dust suppressants and properly-operated equipment in good working order. With these mitigation measures, any effects on air quality will be short-term, ending when construction is complete. Future operation of the proposed Regional WWTP project will have minimal impact on air quality as the site is distant from residences. Therefore, no significant adverse impact to air quality will result from the project.

4. **Archaeological and Historical Resources**

An archaeological assessment was conducted for the Regional WWTP project. The proposed project will be implemented on property that is currently in agricultural production. The area immediately surrounding the project includes a bike trail, agricultural fields and the Clear Fork Mohican River. A November 2018 Phase I archaeological survey that included shovel testing and visual inspection, yielded no significant archaeological finds. Although the survey identified one archaeological site and one dwelling, neither were eligible for listing in the National Register of Historic Places (NRHP). The Ohio Historic Preservation Office (OHPO) concluded, and Ohio EPA agrees, that the project will have no effect on cultural resources.

In the event of archaeological finds during construction, contractors and subcontractors are required under Ohio Revised Code Section 149.53 to notify OHPO of any archaeological discoveries in the project area, and to cooperate with that entity (and with Ohio EPA) in archaeological and historic surveys and salvage efforts when appropriate.

5. **Drinking and Ground Water**

Construction of the Butler Regional WWTP project should not have significant adverse long-term impacts on drinking water or ground water resources. No water supply wells are in the construction vicinity. Dewatering of ground water to enable below-grade work may be necessary but is not expected to create significant adverse impacts.

6. **Floodplains**

The only proposed project work to occur within the floodplain is work associated with the demolition of Butler’s WWTP, construction of the new outfall structure and construction of both Villages’ pump stations. Work to be competed in association with the pump stations will be elevated or otherwise flood-protected to a height two feet above the 100-year base flood elevation and will comply with all Village floodplain management regulations.

7. **Surface Water Resources and Aquatic Habitat**

The Village of Butler’s WWTP, the Village of Bellville's WWTP, the Clear Fork Mobile Home Park's WWTP and the Clear Fork High School's WWTP all currently discharge their treated wastewater to the Clear Fork Mohican River, which is part of the Muskingum River watershed. The Clear Fork
Mohican River drains a total of 105.3 square miles and lies within Ashland and Richland counties. The Clear Fork Mohican River has an aquatic life use designation of warmwater\textsuperscript{1} habitat.\textsuperscript{2}

The proposed project will eliminate Butler’s existing WWTP discharge, Bellville’s existing WWTP discharge, Clear Fork Mobile Home Park’s WWTP discharge, and Clear Fork High School’s WWTP discharge, thereby eliminating these sources of contamination to Clear Fork Mohican River. The new regional WWTP discharge outfall will be located approximately 100 feet from the Village of Butler’s existing outfall, near river mile 14. The new WWTP is being designed to address the treatment deficiencies at the existing plants and to eliminate sources of contamination to waters of the State.

The proposed force main will cross Clear Fork Mohican River and several other smaller streams; however, all stream crossings will be directionally drilled to avoid direct construction disturbance to the stream.

The new outfall structure’s headwall will be located within approximately 6 linear feet of the Clear Fork Mohican River. The headwall will be constructed back into the river bank so that it will not extend out into the existing channel. Work associated with this activity is covered under United States Army Corps of Engineers Nationwide Permit Number 12 (NWP 12); however, it does not meet the Ohio Environmental Protection Agency’s Water Quality Certification conditions of NWP 12, so the community has applied for Director’s Authorization.

The project’s contract documents require that the Village’s contractors properly install and maintain all appropriate erosion and sedimentation controls in accordance will all applicable storm water pollution prevention and erosion control plans. Additionally, the selected contractor will be required to work with Ohio EPA to ensure that the placement of any spoil material generated by the project receives approval prior to disposal. No disposal of spoil material will be permitted in wetlands, in or along streams, or at other environmentally-sensitive locations. As a result of these provisions, Ohio EPA anticipates that no significant, adverse, direct impacts on surface water features will result from the Village’s proposed project.

8. **Terrestrial Habitat and Agriculture**

The United States Fish and Wildlife Service has confirmed there are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. And the Ohio Department of Natural Resources confirmed that there are no unique ecological sites; geologic features; animal assemblages; scenic rivers; state wildlife areas, nature preserves, parks or forests; national wildlife refuges, parks or forests; or other protected natural areas within a one-mile radius of the project area.

However, the project is located within the range of the Indiana bat (\textit{Myotis sodalis}), a federally-endangered species, and the northern long-eared bat (\textit{Myotis septentrionalis}), a species that is

\begin{itemize}
  \item Warmwater habitat (WWH) – warmwater habitats are capable of supporting and maintaining a balanced, integrated, adaptive community of warmwater aquatic organisms.
\end{itemize}
currently proposed for listing as federally endangered. Both species are protected under the Endangered Species Act. Unavoidable cutting of trees with suitable roosting and brood rearing habitat for the bat (tree species with exfoliating bark, such as hickory and oak, living or standing dead trees or snags with exfoliating, peeling or loose bark, split trunks and/or branches or cavities), and specifically, such trees that are greater than or equal to 3 inches diameter at breast height (dbh) shall be performed between November 15 and March 15 when the bats would not be using such habitat. If this time frame cannot be followed, the contactor must contact the U.S. Fish & Wildlife Service’s Reynoldsburg Office (614-469-6923) prior to cutting for guidance to conduct an emergence survey to document the absence or presence of the bats.

This project must not have an impact on freshwater native mussels at the project site. This applies to both listed and non-listed species. Per the Ohio Mussel Survey Protocol (2016), all Group 2, 3, and 4 streams (Appendix A) require a mussel survey. Per the Ohio Mussel Survey Protocol, Group 1 streams (Appendix A) and unlisted streams with a watershed of 10 square miles or larger above the point of impact should be assessed using the Reconnaissance Survey for Unionid Mussels (Appendix B) to determine if mussels are present. Mussel surveys may be recommended for these streams as well. This is further explained within the Ohio Mussel Survey Protocol. Therefore, if in-water work is planned in any stream that meets any of the above criteria, the Department of Wildlife (DOW) recommends the applicant provide information to indicate no mussel impacts will occur. If this is not possible, the DOW recommends a professional malacologist conduct a mussel survey in the project area. If mussels that cannot be avoided are found in the project area, as a last resort, the DOW recommends a professional malacologist collect and relocate the mussels to suitable and similar habitat upstream of the project site. Mussel surveys and any subsequent mussel relocation should be done in accordance with the Ohio Mussel Survey Protocol. The Ohio Mussel Survey Protocol (2016) can be found at: http://wildlife.ohiodnr.gov/portals/wildlife/pdfs/licenses%20&%20permits/OhioMussel%20Survey%20Protocol.pdf

To reduce impacts to the greater redhorse (Moxostoma valenciennesi), a state threatened fish, no in-water work shall occur from April 15 to June 30.

The eastern hellbender (Cryptobranchus alleganiensis alleganiensis), a state endangered species and a federal species of concern has been recorded within the Clear Fork Mohican River. This long-lived, entirely aquatic salamander inhabits perennial streams with large flat rocks. In-water work in hellbender streams can reduce availability of large cover rocks and can destroy hellbender nests and/or kill adults and juveniles. The contribution of additional sediments to hellbender streams can smother large cover rocks and gravel/cobble substrate, making them unsuitable for refuge and nesting. The DOW can provide guidance on avoiding and/or minimizing impacts to this species while the outfall is being constructed.

Although the project will convert approximately 2.88 acres of farmland, both the WWTP and lines serving it are exempt from the US Farmland Protection Policy Act, as the WWTP is a form of water storage and the lines are to be located in the right of way and underground.

9. Safety, Traffic, Noise and Aesthetics

The Regional WWTP project work is located to the north and south of the B&O railroad bike path, to the north, south and along road right-of-way of State Route 97 and within fields and grassy areas. All force mains and gravity sewers will be jack and bored underneath the B&O railroad bike path
and the contractor will coordinate the associated work with the Richland County Park District to allow a minimum of 48-hours notification to users of closings and work schedules. The bike trail shall be restored to its original condition. All road crossings shall be directionally drilled beneath roadways. The contractor will coordinate the applicable work with the Ohio Department of Transportation. And where work will take place in fields or grassy areas, the contractor will store and replace the topsoil.

Construction of the project will result in increased noise and traffic in the vicinity. These impacts will be mitigated by limiting the hours of work. Construction equipment shall not be operated between the hours of 7 P.M. through 7 A.M. Monday through Saturday, and all-day Sundays and Holidays.

Although construction activity is generally considered aesthetically displeasing, once construction is complete, most of the project areas will be restored and returned to pre-construction conditions. And since the new WWTP is to be located in a site that is generally inaccessible to the public, local aesthetics will be mostly unchanged.

Public Participation

The Village has made efforts to keep the public abreast of this project throughout its development and to ensure that the project meets the needs and addresses the concerns of the two communities in the least controversial manner, while avoiding significant adverse environmental impacts. This has been accomplished through a combination of separate and joint public council meetings, the publication of information in multiple locations such as in the Butler Area Newsletter, in flyers in all resident’s water and sewer bill mailings, and on both Villages’ websites. Additionally, preceding field activity, the public will receive updated information about the project. And, as stated previously, work on the bike trail will be coordinated with the Richland County Parks District, which will post any closures or work on their website at http://www.richlandcountyoh.us/index.php/departments/natural-resources/park-district.

The following agencies and organizations were provided an opportunity to review the project’s planning information:

- Ohio Environmental Protection Agency
- Ohio Historic Preservation Office
- Ohio Department of Natural Resources
- US Army Corps of Engineers
- US Department of Agriculture
- US Fish and Wildlife Service

As part of its State Environmental Review Process, Ohio EPA will post this EA on DEFA’s web page located at: http://epa.ohio.gov/defa/ofa.aspx#169544610-whats-new (under Documents Available for Review and Comment – WPCLF Documents)
Ohio EPA is unaware of any public opposition to this project.

Conclusion

Based upon Ohio EPA’s review of the planning information and the materials presented in this EA, it is concluded that there will be no significant adverse impacts from the Butler Regional Wastewater
Treatment Plant project as it relates to the environmental features discussed previously. Using standard construction mitigative measures, any adverse impacts from construction should generally be short-term and insignificant.

The completion of this project is an important investment in critical water pollution control infrastructure and in the improvement of water quality of the Clear Fork Mohican River. The project will remove four failing treatment plants and their associated discharges and replace them with a new, regional WWTP with increased treatment capacity based on the new Best Available Demonstrated Control Technology (BADCT) limits, and in doing so, will improve water quality by discharging fewer pollutants to the Clear Fork Mohican River.

Questions or Comments, Contact
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