



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

March 15, 2016

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

**Village of Mount Orab
WWTP Improvements Project (All Phases)
CS390636-0016**

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, a LER is warranted. Specifically, the proposed project constitutes an action in a sewerred community which is for minor upgrading and/or minor expansion of an 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, construction of new ancillary facilities adjacent or appurtenant to existing facilities, and not an extension of new collection sewers. Within the Village of Mount Orab's wastewater treatment plant (WWTP), the village proposes to complete two phases of improvements. The first phase is to be completed in the next year, while the second phase will be completed at a later date still to be determined.

Furthermore, the proposed overall 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 controversy;
- will not create a new, or relocate an existing, discharge to surface or ground waters, or cause pollution of surface or ground waters;
- will not result in substantial increases in the volume of discharge or the loading of pollutants from an existing source or from new facilities to receiving waters; and
- will not provide capacity to serve a population substantially greater than the existing population.

A map depicting the location of the proposed improvements constituting this proposed two phase project is included as part of the LER. The LER presents information on the proposed project, its cost, 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.

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 can be issued now for this proposed project.

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

Sincerely,



Jerry Rouch, Assistant Chief
Division of Environmental and Financial Assistance

JR/KH

Attachment

LIMITED ENVIRONMENTAL REVIEW

Date: March 15, 2016

A. Project Identification

Name: Village of Mount Orab, WWTP Improvements Project

Address: The Honorable Bruce Lunsford
Mayor, Village of Mount Orab
211 South High Street
P.O. Box 466
Mount Orab, Ohio 45154

Water Pollution Control Loan Fund (WPCLF) Loan Number: CS390636-0016

B. Existing Need

In the early 1990s, the Village of Mount Orab constructed a new wastewater treatment plant (WWTP) south of the village with financial assistance from the WPCLF program. Now, the village needs to make significant improvements to this facility to continue to handle the wastewater coming from its customers inside the village and the Village of Hamersville, operate more efficiently, reduce wear on equipment, and improve both treatment processes and the quality of its effluent. In so doing, it will address National Pollutant Discharge Elimination System (NPDES) permit effluent limitation violations due to high flows entering the WWTP. Figure 1 below provides a map showing the location of Mount Orab and the proposed WWTP improvements. Hamersville is south of the area shown.



Figure 1, Village of Mount Orab Planning and Service Areas

C. Project Description

According to the village's engineering consultant, an eleven-part, two-phase project is needed to provide a 20-year solution to the village's current wastewater treatment needs. At this time, the village is only seeking WPCLF funding for Phase 1 consisting of the following eight improvements to its primary and secondary treatment components:

1. a new preliminary treatment building with a mechanically cleaned bar screen, screenings washer compactor, vortex grit separator, recessed impeller grit pump, grit classifier and washer,
2. a splitter box to bypass the existing in-line equalization basin except for high flow events,
3. a new aerated sludge holding tank to provide redundancy for the existing holding tank,
4. three new blowers to improve the performance at the aerated sludge holding tanks,
5. a new buried primary electrical service to supplement the existing service and to provide for future needs (Phase 2),
6. two diesel-powered standby, emergency generators to run the WWTP during power failures,
7. new site piping to connect the new facilities to the existing components, and
8. storm water runoff controls, other impact mitigation, and site restoration.

The following WWTP layout superimposed on an aerial photograph of the WWTP site shows the proposed two-phase project's components.

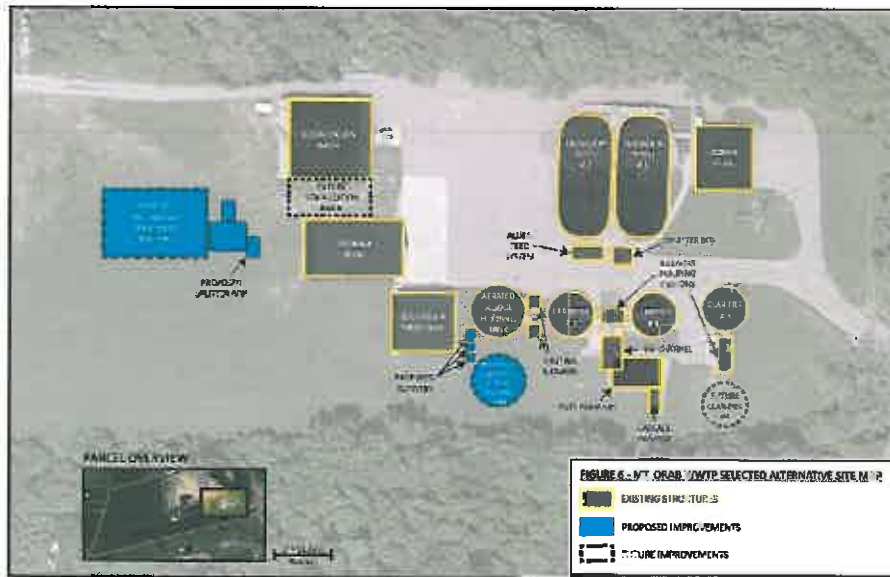


Figure 2, Proposed WWTP Improvements

In addition to these major improvements, minor fill will be needed in the area of the new sludge holding tank to allow for a “mowable” slope at the south end of the plant. Geothermal heat pumps will be installed in the new preliminary treatment building in an effort to minimize energy use at the plant – geothermal is the most sustainable viable energy option available to the Village, since

there is no natural gas available at the site or along US 68 for heating cycles. Readers should note that the Phase 1 improvements are needed regardless of if or when the Phase 2 work is done.

Phase 2 is expected to consist of the following three improvements and cost about \$550,000:

1. future improvements to the oxidation ditch aerators to allow for extra aeration at an increased plant capacity,
2. a future fourth clarifier to increase the plant's hydraulic capacity to 1.0 MGD, and
3. a 125,000 gallon equalization basin.

Mount Orab has indicated that the Phase 2 improvements will be made if and when wastewater flows entering the village's WWTP approach its current flow capacity limits. Presently, the village's WWTP is rated to handle 0.7 million gallons per day (mgd) on an average daily flow basis and 1.7 mgd of peak flows on a maximum daily flow basis. Between 2008 and 2014, flows averaged 0.5615 mgd. In 2011, the village's WWTP experienced a peak flow of 1.7 mgd, which exceeded the rated capacity of the WWTP then in effect in the NPDES permit. This is in contrast to the WWTP's originally rated capacity of 0.375 mgd, which was in effect from when it was first built in the early 1990s until 2007-2008. The village's current permit, with its new total phosphorus limit, expires in 2018.

Readers should note that the village's on-going infiltration/inflow (I/I) removal efforts addressed in a prior LER are expected to enable the WWTP to better respond to high flows under storm conditions. Please see Figure 3 below. Should Phase 2 change in scope at a later date to reflect new information, then a future environmental review document will be prepared and issued. If not, then this environmental review document will cover these proposed improvements too.

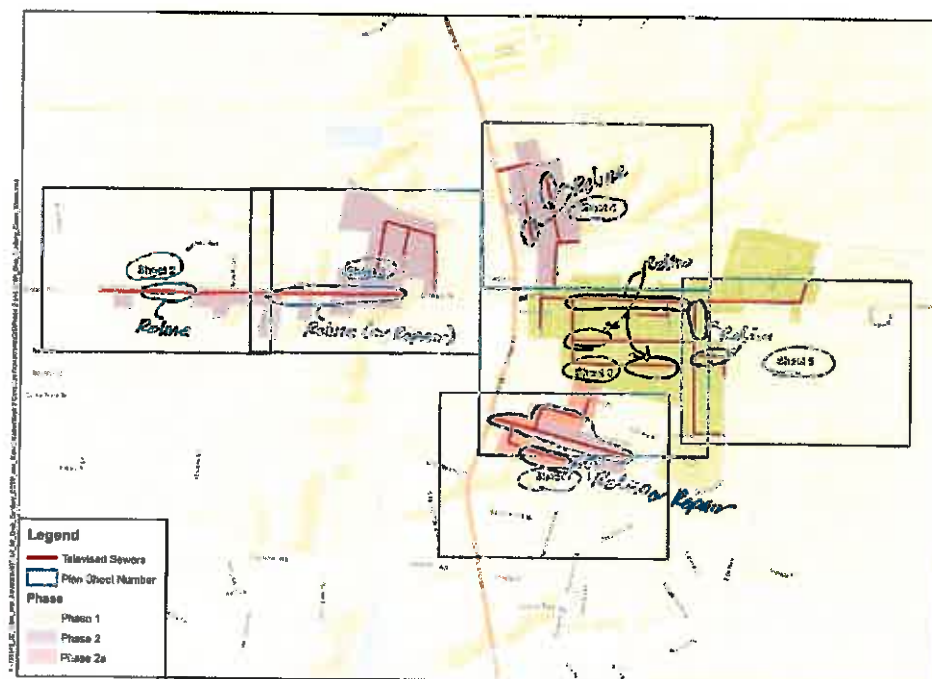


Figure 3 - Location of the Village's Ongoing Sewer Rehabilitation Improvements

Mount Orab advertised the Phase 1 WWTP improvements comprising this proposed project for bids on January 17, 2016 and opened bids totaling \$2,994,000 on February 5, 2016. All this amount, plus related planning, design, and construction services costs, totaling \$3,316,645, is expected to be funded by a 1.18%, 30-year term WPCLF loan, an Ohio Public Works Commission (OPWC) \$174,999 grant, and a \$175,000 OPWC 0% loan. Revenues collected from the village's tax increment financing districts and sanitary sewer charges will be used to repay the WPCLF and OPWC loans. The WPCLF discounted interest rate is based, in part, on compensating the village for the costs of the two standby emergency generators.

More information on the village's proposed schedule for completing these wastewater improvements can be found in the "Project Implementation" and "Estimated Project Costs and Proposed Project Schedule" sections that follow.

D. Project Implementation

To implement the proposed project described above, the Village of Mount Orab intends to finance the Phase 1 improvements to its WWTP through Ohio EPA's WPCLF program. Construction of the proposed project is expected to take one year to complete. To pay for these WWTP improvements, the village has shown that its tax increment financing revenues and existing sewer service charges are high enough that it will not need to increase its sanitary sewer service charge.

Currently, a typical residential wastewater customer's annual fee in Mount Orab is about \$348, based on an annual usage of 39,600 gallons per year (\$29 per month for 3300 gallons of water use). This fee is based on a charge of \$17.50 for the first 2000 minimum gallons, \$8.90 for each additional 1000 gallons of water usage between 2,001 and 3,000 gallons, and \$8.65 per 1000 gallons over 3,000 gallons. Put another way, an average residential customer's annual wastewater fees are equivalent to 0.88% of the village's 2009-2013 American Community Survey (ACS) median household income figure of \$39,335, and are generally considered to be affordable for an average residential wastewater customer of Mount Orab. These figures do not reflect any of the tax increment financing costs wastewater customers in these districts may be paying.

E. Limited Environmental Review Criteria

Because the proposed WWTP improvements project meets certain minimum conditions and will not individually, cumulatively over the useful life of these improvements, or in conjunction with other federal, state, or private actions have a significant adverse effect on the quality of the human environment, a Limited Environmental Review (LER) is warranted. More specifically, the LER conditions cover actions in sewerred communities (such as the area served by Mount Orab's WWTP) that are 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, construction of new ancillary facilities adjacent or appurtenant to existing facilities, and not an extension of new collection sewers (see 3745-150-05(A)(1)). On this particular project, the village plans to make its Phase 1 improvements over the next year.

Given this project scope, Ohio EPA has concluded that the village's proposed two-phase WWTP project meets the following criteria for the reasons noted below.

- 1. The proposed project will have no significant adverse environmental effects.** As the proposed wastewater improvements constituting Mount Orab's WWTP improvements project are generally limited to areas previously disturbed by construction activities in the early 1990s, the potential for significant direct, indirect, and cumulative impacts to the environment is minimal. This conclusion was reached mainly because of the location of the proposed improvements outside of the floodplain elevations calculated by the village's consultant and the prior disturbed conditions found there. In addition, any excavated material from the WWTP project may only be permanently disposed of at a prior disturbed location approved by Ohio EPA prior to its use. It cannot be permanently disposed of in any wetlands, floodplains, or undisturbed low areas. In this instance, all excavated material will remain on the WWTP site and outside the floodplain of Snapping Turtle Run.

Given the expected relatively short-term duration of the proposed project and its isolation from the village's residential areas, area residents should only notice minor increases in heavy equipment traffic, air pollution, or odors at the WWTP site south of town during the estimated one year long construction period. As a condition of this project's approval, trucks and other heavy equipment are to be properly maintained to minimize noise and air quality impacts.

- 2. The proposed project does not require extensive general or specific impact mitigation.** As all of the proposed work to complete this project is straight-forward and will occur within previously-disturbed areas at the WWTP site, it does not require any extensive mitigation of environmental impacts. Routine impact mitigation found in the detail plans covering erosion and sedimentation from storm water runoff and dewatering activities, prohibited construction activities, and other environmental attributes (e.g., air quality, noise levels, odors, traffic, trees, site dewatering, and archaeological resources) will assure that impacts from the proposed construction activities are kept to a minimum. In particular, the contractor is responsible for restoring the project area to a pre-construction condition upon job completion.
- 3. The proposed project will have no adverse effect on high value environmental resources.** According to the reviews completed by federal, state, and regional agencies, no high value cultural or environmental resources are present in the immediate project area. Rather, the proposed improvements to the village's WWTP are expected to address the WWTP needs identified by the village's consulting engineer, and result in maintained water quality. No tree removal or trimming is expected to be needed to construct the proposed WWTP improvements, so Ohio EPA expects that no adverse impacts to Indiana and northern long-eared bats, or their known habitat will occur as a result of this proposed project. The other federal and state listed endangered and threatened species known to be in Brown County are absent from the project area shown above in Figure 2.
- 4. The selected alternative for this project is clearly cost-effective.** In comparison to a no-action alternative, the selected alternative for Mount Orab's proposed WWTP project

is clearly more cost-effective. The reason for this conclusion is that not fixing the identified WWTP problems would allow the operational problems to persist.

5. **The proposed project is not a significantly controversial action.** Based on the lack of widespread public interest in this project, the use of tax increment financing revenues to repay the WPCLF loan, and the fact that this project will not result in any increase in the village's wastewater rates, Ohio EPA has determined that this project is not controversial.
6. **The proposed project does not involve new or relocated discharges to surface or ground waters.** The proposed WWTP improvements covered in this document will not entail any new or relocated discharge of wastewater to surface or ground water. Instead, the proposed project is expected to address existing problems within the WWTP site that could affect the quality of wastewater leaving the village's WWTP and entering Snapping Turtle Run and other downstream surface waters.
7. **No substantial increase in the volume of discharge or the loading of pollutants from an existing source or from new facilities to receiving waters will occur.** Based on the scope of the proposed improvements to Mount Orab's WWTP, not only will there neither be a substantial increase in the volume of wastewater discharged nor a significant increase in the loading of pollutants discharged to area streams, but rather, the performance of the village's wastewater facilities should improve. Thus, Ohio EPA expects that these infrastructure improvements should result in better performance at Mount Orab's WWTP and continued good chemical water quality in area streams, such as Snapping Turtle Run and Sterling Run. Overall, this proposed project is expected to enable the WWTP to handle any additional average daily or peak flows generated by people living in the WWTP service area by 2036.
8. **The proposed project will not provide capacity to serve a population substantially greater than the existing population.** As noted above, the primary purpose of this project is to address the current National Pollutant Discharge Elimination System (NPDES) permit needs within Mount Orab's WWTP, but not to increase its capacity to convey raw wastewater from undeveloped areas near the village. Accordingly, the basis-of-design for the proposed wastewater improvements is consistent with the village's NPDES permit, and Phase 1 will provide only enough capacity to serve the previously established, existing population of the service area. There is no additional growth component to this project. As Brown County is currently in attainment for all six primary air pollutants, Ohio EPA expects that this proposed project will not result in any adverse effects on air quality.

F. Estimated Project Costs and Proposed Project Schedule

As noted above, the as-bid construction cost of the proposed project is \$2,994,000, and the total project cost of \$3,316,645 is expected to be financed by a 1.18% WPCLF loan and OPWC grant and loan funds. Revenues collected from the village's tax increment financing districts and sewer service charges will be used to repay the WPCLF and OPWC loans.

Given the rate information presented earlier in this document, no significant adverse economic impacts on local residential users of Mount Orab's wastewater systems are anticipated. Assuming a 1.18% economic hardship interest rate, Ohio EPA expects that Mount Orab will save an estimated \$1.08 million over the thirty-year term of its loan when compared to a market-rate loan of 3.10%.

The village currently expects the construction of the proposed project will begin after March 2016 and will take one year to complete, including final site restoration. Under this schedule, the project should be done by April 2017.

G. Public Participation and Notice

According to the village's consultant, no public meetings, other than regularly scheduled village council and board of public affairs meetings were held on this project. As a result, Ohio EPA requested that the village post a fact sheet on its web site for thirty days and provide a randomly selected group of 50 residents with a copy of the fact sheet to inform them about the proposed WWTP improvements and their costs. The village did so and independently issued a fact sheet press release to the Brown County Press newspaper that ran January 17, 2016. In this interval, two supportive public comments were received regarding the proposed project. No negative feedback was received on the content of the fact sheet. On this basis, Ohio EPA has determined that Mount Orab has satisfactorily summarized the proposed project for area residents and provided them with ample opportunity to review and comment on its proposal for WPCLF financing of its wastewater project.

Further information that supports this decision to issue a LER is available upon request at the Village of Mount Orab's offices at 211 South High Street, P.O. Box 466, Mount Orab, Ohio 45154.

H. Interagency Coordination

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

| | |
|--------------------------------------|---|
| Ohio Department of Natural Resources | Ohio EPA |
| Ohio Historic Preservation Office | United States Fish and Wildlife Service |

I. Conclusion

The proposed project is sufficiently limited in scope and meets all applicable criteria to warrant a LER. The planning activities for the proposed project 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 (e.g., noise, dust, odors, traffic rerouting and economic impacts) or on sensitive resources such as air quality, surface water, floodplains, wetlands, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, coastal zones, state-designated scenic and recreational rivers, state or federal wildlife

refuges, or threatened or endangered species. The improved operation of Mount Orab's WWTP is the expected benefit of this proposed project and will enable it to continue to meet its NPDES permit compliance responsibilities under the Clean Water Act.

J. For further information, please contact:

Kevin Hinkle
Ohio EPA, Division of Environmental and Financial Assistance
P.O. Box 1049
Columbus, Ohio 43216-1049
(614) 644-3712