



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

May 19, 2015

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 Crestline
Overflow Elimination Project (Sewer Separation Improvements, Phase 2)
WPCLF Loan Number CS390289-0004

The purpose of this notice is to advise the public that Ohio EPA has reviewed the above-referenced project and finds that neither an Environmental Assessment (EA) nor a Supplemental Study (SS) is required to complete the environmental review of the project. Instead, this project meets the criteria for a Limited Environmental Review (LER). These criteria are summarized below in this document and in the attached LER.

The proposed project involves the relining of sewers with cured-in-place pipe (CIPP), rehabilitation of manholes, and the replacement of two pumps at the Davis Street pump station. Completion of the project will reduce the frequency and volume of overflows at two combined sewer locations.

The LER was completed for this project as it will not individually, cumulatively over time, or in conjunction with other Federal, State, local, or private actions have a significant adverse effect on the quality of the human environment. Consequently, a Finding of No Significant Impact can be issued now for this project.

The Water Pollution Control Loan Fund (WPCLF) program requires the inclusion of environmental factors in the decision-making process for project approval. Ohio EPA has done this by incorporating a detailed analysis of the environmental effects of the proposed action in its review and approval process. Environmental information was developed as part of the facilities planning process. A subsequent review by this Agency has found that the proposed action does not require the preparation of an EA or an SS.

Our environmental review concluded that because the proposed project is limited in scope and meets all applicable criteria, a Limited Environmental Review is warranted. Specifically, the project constitutes an action in a sewerred community which is for replacement and upgrade of existing infrastructure. Furthermore, the proposed project:

- has no significant environmental effect;
- does not require extensive specific impact mitigation;
- has no effect on high value environmental resources;

- is cost effective;
- is not a controversial action;
- does not create a new, or relocate an existing discharge to surface or ground waters;
- will not result in substantial increases in the volume of discharge or the loading of pollutants from an existing source or from new facilities to receiving waters; and
- will not provide capacity to serve a population substantially greater than the existing population.

A map depicting the location of the project is included as part of the LER. The LER presents information on the proposed project, its costs, and the basis for our decision. Further information can be obtained by calling or writing the contact person listed on the back of the LER.

Upon issuance of this determination, 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,

A handwritten signature in black ink that reads "Kent A. Spaulding" followed by a slanted line and the word "for".

Jerry Rouch, Chief
Division of Environmental and
Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

A. Project Identification

Name: Village of Crestline
Overflow Elimination Project (Sewer Separation Improvements, Phase 2)

Address: Mr. Mark Milliron, Village Administrator
100 North Seltzer Street
Crestline, OH 44827

WPCLF No.: CS390289-0004

B. Background and Existing Need

The Village of Crestline is under "Findings and Orders" by the Director of Ohio EPA regarding the Village's wastewater collection and treatment systems. The Findings and Orders, which became effective on April 4, 2011, require the Village to identify and eliminate sewer overflow locations within its sewer system infrastructure, as well as achieve compliance with the effluent limits in its National Pollutant Discharge Elimination System (NPDES) permit.

As required by the Findings and Orders, a General Plan was developed and submitted in December 2011 to address sewer and wastewater treatment plant (WWTP) upgrades and to eliminate existing sewer overflows. Now, the Village of Crestline is requesting loan funds through Ohio's Water Pollution Control Loan Fund (WPCLF) to finance improvements to the Village's wastewater collection system in accordance with the phased approach proposed in the General Plan.

The Village of Crestline operates and maintains a wastewater collection and treatment system originally constructed in 1946, which has served a fairly stable population of around 5,000 residents since its construction. The wastewater treatment plant, which is currently undergoing an upgrade to its sludge treatment processing, provides secondary treatment and consists of the following elements: mechanical bar screen, grit chamber, equalization structures, two primary clarifiers, ultra-violet (UV) disinfection, final effluent flow metering, aerobic digester, and sludge drying beds. The plant has an average daily design flow of 0.95 million gallons per day (MGD) and a peak capacity of 2.2 MGD.

The Village is undergoing a multi-phase upgrade of the wastewater facilities. This planned project to begin eliminating overflows and to reduce inflow and infiltration (I/I) is considered phase two of the sewer system improvements project. These improvements to the collection system will allow the Village to reduce both wet-weather flows to the plant and elevated bacteria levels in Westerly Creek. Other portions of the planned improvements include the ongoing sludge handling project, further overflow elimination, sewer separation projects and finally additional upgrades at the WWTP to handle wet and dry weather flows once the collection system has been upgraded.

No increase in capacity or discharge limits will occur as a result of the proposed project. The Village of Crestline sewer facilities serve approximately 2,097 connections with an estimated population of 4,637. Approximately 93% of the connections are residential users.

C. Project Description

This project includes the relining of sewers with cured-in-place pipe (CIPP), rehabilitation of manholes and the replacement of 2 pumps at the Davis Street pump station. All work is being conducted on existing infrastructure with the purpose of reducing the frequency and volume of overflows at two combined sewer overflow (CSO) locations. The locations are mostly adjacent to streams and are shown on the map below (Figure 1).

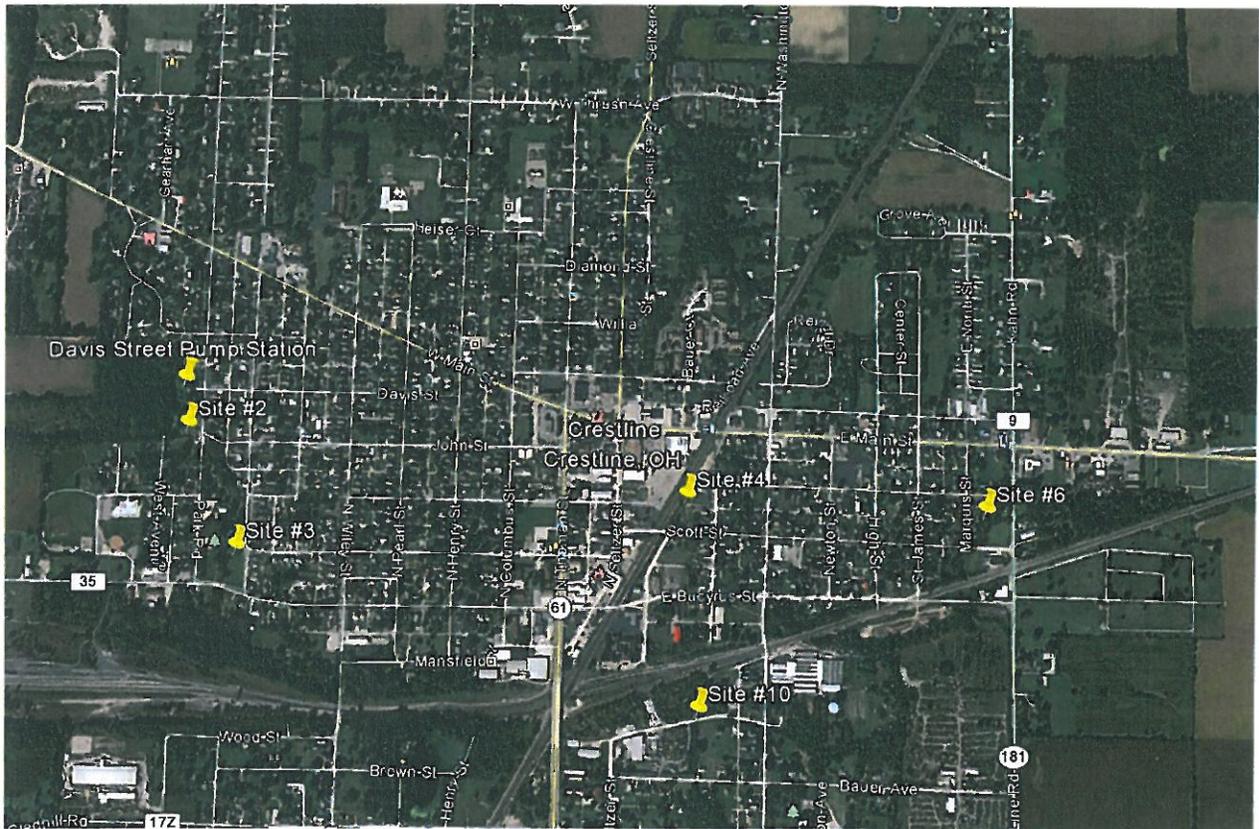


Figure 1 – Crestline aerial view with project locations

Much of the combined sewer system in Crestline has been separated; however, project planning activities identified 7 active overflow areas within the Village's existing sanitary sewer system. Phase I of the sewer improvements project eliminated two overflows and reduced the frequency of two others. This project, including CIPP relining at five locations totaling approximately 3850 LF of pipe, manhole rehabilitation throughout the collection system, and the replacement of two pumps with higher capacity grinder units, will further reduce the occurrences of overflows. The planned repair of sewer lines will help prevent inflow and infiltration of wet-weather flows into the sewer system. This, in turn, is a critical step in eliminating the hydraulic overload of sanitary sewer lines during rain events that not only leads to sanitary sewer overflows at locations such as pump stations and manholes, but also contributes to the hydraulic overload of the Village's

wastewater treatment plant, which decreases the WWTP's ability to properly treat the Village's sanitary sewer waste.

Sanitary sewer overflows are a known threat to public health and also degrade water quality and aquatic habitats. The Crestline plant discharges to Westerly Creek about a half mile from its confluence with Paramour Creek. The Aquatic Life Use designation for both Westerly Creek and Paramour Creek in the Ohio Administrative Code's (OAC 3745-1-11) Water Quality Standards is Warmwater Habitat (WWH). Water quality monitoring has shown that Westerly Creek and Paramour Creek, at its confluence with Westerly Creek, are in Non-Attainment of its designated WWH Aquatic Life Use.

D. Estimated Project Costs

The total cost for this project is estimated to be \$306,122.82. The Village of Crestline plans to finance project costs through the Water Pollution Control Loan Fund, which is administered by Ohio EPA's Division of Environmental & Financial Assistance.

The Village of Crestline qualifies for the hardship interest rate of 1.0%. During the 20-year loan period, the Village will save an estimated \$80,573 in interest payments on the \$306,122.82 borrowed by using WPCLF dollars at this rate, compared to a market-rate of 3.26%.

The Village of Crestline has a population of 4,637, and a median household income (MHI) of \$38,571, according to the 2007-2011 American Community Survey. The quarterly sewer rate for a household in the Village of Crestline using 7,756 gallons per month is \$205.31, or approximately \$821 annually, which represents 2.1% of the MHI. The current rate structure was established in ordinance in 2012 and allows for annual increases through 2020. No rate increases are planned specifically for this project.

E. Project Schedule

It is anticipated that WPCLF funding will be awarded for the proposed project in May 2015. Construction is expected to commence shortly after the funds have been awarded and is expected to be completed within two to three months.

F. Public Notification

These projects have been discussed at several Village of Crestline Council meetings that are open to the public. There is no record of public opposition to this project. Ohio EPA will issue a copy of its Limited Environmental Review (LER) decision and Finding of No Significant Impact for this project to interested parties. Additionally, this document will be posted on the Village of Crestline's and Ohio EPA's website, at <http://www.epa.ohio.gov/defa/ofa.aspx#169544610-whats-new>.

G. Planning Information

Coordination has been completed with the following agencies for the proposed project:

Ohio Environmental Protection Agency
Ohio Department of Natural Resources
Ohio Historic Preservation Office

No adverse comments were received from any of the above agencies.

H. Conclusion

The proposed project meets the project type criteria for a Limited Environmental Review; namely, it is an action in a sewered community for the repair or upgrade of existing structures. Furthermore, the project meets the other qualifying criteria for a LER; specifically, the proposed project:

- *Will have no adverse environmental effect and will require no specific impact mitigation*, as there are no known sensitive environmental resources within the proposed project area. The proposed project construction activities include the sewer relining, manhole rehabilitation and pump replacement. There will be no significant adverse effects as a result of project implementation, or the need for any additional mitigation measures beyond typical erosion control and construction best management practices, since the project will entail work only on existing sewers;
- *Will have no effect on high-value environmental resources*, as construction will take place only in sewers, on manholes, and within an existing pump station, where no high-value resources are present, or close at hand;
- *Is not a controversial action*, as there is no known opposition to the proposed project at this time;
- *Does not create a new, or relocate an existing, discharge to surface or ground waters*, since the project only involves the replacement and rehabilitation of structures and equipment within the existing collection system;
- *Will not result in substantial increases in the volume of discharge or loading of pollutants from an existing source or from new facilities to receiving waters*, since the proposed project does not involve any change in pollutant loadings, discharges, or other activities that might increase system capacity. Rather, it proposes to construct a more effective and efficient sewage collection system that will reduce pollutants in receiving waters, and;
- *Will not provide capacity to serve a population substantially greater than the existing population*, since the project is not related to serving new growth, or increasing capacity at the WWTP.
- *Is clearly cost-effective*, as the project will be financed through the WPCLF and save over \$80,000 in interest payments over conventional financing and help complete the requirements of the Finding and Orders the village is under.

In summary, the planning activities for the project have identified no potentially-significant adverse impacts. The project is expected to have no significant short-term or long-term adverse impacts on the quality of the human environment, or on sensitive resources (floodplains, wetlands, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, or threatened or endangered species). Typical construction impacts, such as noise, dust, and exhaust

fumes, will be short-term and addressed through the use of standard best management practices.

The proposed project is a cost-effective way to address the failing infrastructure that is in need of improvements. Once implemented, it will help to maintain the satisfactory operation and permit compliance of the existing wastewater treatment system, thereby protecting public health and local water quality from the impacts of discharge violations. By using the WPCLF low interest financing, the Village of Crestline has minimized the project cost.

I. For further information, please contact:

Jeff Boyles
Ohio EPA - Division of Environmental & Financial Assistance
P.O. Box 1049
Lazarus Government Center
Columbus, Ohio 43216-1049
Telephone: (614) 644-3656

E-mail: Jeffrey.boyles@epa.ohio.gov