



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

MAY 18 2015

May 12, 2015

City of Oregon  
Attn: Paul Roman, P.E., Director of Public Service  
5330 Seaman Road  
Oregon, Ohio 43616

**Re: Oregon Sanitary Sewer Rehabilitation Project, Phase 3  
Limited Environmental Review and Finding of No Significant Impact  
WPCLF Loan No.: CS390721-0016**

Dear Mr. Roman:

Please find attached the limited environmental review (LER) and finding of no significant impact (FONSI) for the Sanitary Sewer Rehabilitation Project, Phase 3. Although a public comment period is not required, Ohio EPA, DEFA, appreciates that you display this finding and document for a minimum of 30 days on your website or in some other place where the public has access to it.

If you have any questions about the FONSI or the above-stated instructions, please feel free to contact me at (614) 644-3711 or via e-mail me at: [rahel.babb@epa.ohio.gov](mailto:rahel.babb@epa.ohio.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Rahel".

Rahel S. Babb  
Environmental Planner  
Division of Environmental and Financial Assistance

Enclosures

## LIMITED ENVIRONMENTAL REVIEW

### A. Project Identification

Project Name: City of Oregon  
Sanitary Sewer Rehabilitation Project, Phase 3

Address: City of Oregon  
Attn: Paul Roman, P.E., Director of Public Service  
5330 Seaman Road  
Oregon, Ohio 43616

WPCLF Loan No: CS390721-0016

### B. Existing Conditions and Need

The City of Oregon owns and operates a wastewater treatment plant (WWTP) and wastewater collection system. The plant has a rated, average-daily design flow and peak secondary treatment capacity of 8.0 million gallons per day (MGD) and 24.0 MGD, respectively. The daily flow received at the plant currently averages about 6.5 MGD. The treatment plant originally went into operation in 1977 and, since that time, has undergone a series of improvements and additions. Treatment is performed using the activated sludge process followed by chlorination/dechlorination; sludge is treated using aerobic digestion. Treated effluent is pumped through a 36-inch diameter force main well out into Maumee Bay/Lake Erie. Digested sludge is spread by injection in liquid form on agricultural land.

The sanitary sewer service area covers the City of Oregon, portions of eastern Lucas County, the Village of Harbor View and portions of northern Wood County. The sewer system is defined as a separate sanitary sewer system, but it is susceptible to very high, wet-weather flows. These flows result in periodic sanitary sewer overflows, since the treatment plant does not have sufficient capacity to treat all the high flows received at the treatment plant. During high-flow events, equalization basins are filled and the stored wastewater is treated once the high flow rates subside.

The Sanitary Sewer Rehabilitation, Phase 3 project consists of the rehabilitation of existing trunk and local sanitary sewers to reduce storm inflow and infiltration (I/I)<sup>1</sup>. The sanitary sewers to be rehabilitated were built in the mid-1920s and the project area has been targeted as having high I/I through the City's I/I Reduction Program (flow monitoring and smoke testing). The reduction of I/I will alleviate stress on the sanitary sewer system and allow the WWTP to function more efficiently.

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<sup>1</sup> Inflow and infiltration (I/I) is the flow of excess water into sewer pipes from ground water (infiltration) and storm water (inflow) and causes dilution in sanitary sewers. Dilution of sewage decreases the efficiency of treatment and high flows may cause sewage volumes to exceed design capacity at the WWTP, leading to overflows. Most I/I is caused by aging infrastructure that needs maintenance or replacement.

### **C. Alternatives**

An alternatives analysis was completed for this project to determine the most cost-effective and technically feasible alternative for reaching the project goal of eliminating I/I from the sanitary sewer system. The following alternatives were considered for this project:

1. Line the existing sanitary sewers with a cured-in-place liner;
2. Full replacement of existing sanitary sewers; and
3. No action.

Full replacement of the existing sanitary sewers, while technically feasible, would be very cost prohibitive. The “no action” alternative is not acceptable since it contradicts the City’s efforts to remove sources of (I/I). Based on past flow monitoring and smoke testing, the project area has been identified as having chronic I/I. Also in recent years, the City has made many emergency repairs to the existing sewers in Euclid Park and Old Eastmoreland Subdivisions, making the lining or replacement of the sewer a necessity.

The first alternative of lining the existing sanitary sewers was selected due to new technologies now available for lining service laterals, which eliminates or limits disruption to other infrastructure in the public right-of-way. It is the most cost-effective alternative and will provide the least amount of disruption while meeting the City’s goals of eliminating I/I.

### **D. Project Description**

The Sanitary Sewer Rehabilitation Project, Phase 3 is a continuation of the sanitary sewer rehabilitation initiative as required by the City of Oregon Wastewater Treatment Plant’s (WWTP) National Pollutant Discharge Elimination System (NPDES) permit<sup>2</sup>. Generally, this project consists of the rehabilitation, including lining and general sewer repair, of 8-inch, 10-inch and 12-inch diameter vitrified clay pipe. The project also includes the rehabilitation of a 30-inch diameter trunk sanitary sewer, and the replacement or lining of 6-inch diameter service lines and lining of sanitary sewer manholes within the project area (the project area is illustrated on the attached map).

The project is located in the City of Oregon, north of Navarre Avenue (State Route 2) and west of Wheeling Street in the Wheeling Street Sanitary Sewer District. Specifically, it will line 9,666 linear feet of 8-inch diameter sanitary sewer; 358 linear feet of 10-inch diameter sanitary sewer; 2,552 linear feet of 12-inch diameter sanitary sewer; 479 linear feet of 30-inch diameter sanitary sewer; 214 sanitary sewer laterals; and 1,039 vertical linear feet of manholes. Lining will be completed by using Cured-In-Place-Pipe methods, where resin-impregnated flexible tubes are cured to the inner wall of the existing pipe.

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<sup>2</sup> The federal Clean Water Act requires that municipal, industrial and commercial facilities that discharge wastewater or storm water directly from a point source (a discrete conveyance such as a pipe, ditch or channel) into a water of the United States (such as a lake, river or ocean) must obtain a NPDES permit. All permits are written to help ensure the receiving waters will achieve their Water Quality Standards.

#### **E. Estimated Project Costs**

The estimated cost of this project is \$2,128,350. Of the total amount, \$450,000 will be covered by an Ohio Public Works Commission (OPWC) grant. The remaining \$1,678,350 is expected to be funded with a low interest rate loan administered through Ohio EPA's Water Pollution Control Loan Fund (WPCLF). Currently, the market rate for these types of loans is 3.24 percent, while the standard WPCLF interest rate is 1.99 percent. By using WPCLF money to fund this project, the City will save approximately \$250,000 in interest payments compared to market-rate financing.

The City of Oregon has a unique approach to funding the demands of its water and sewer systems. Unlike most enterprise systems, whose rate structures are self-supporting, Oregon's system's revenue base consists of dual funding sources. The rate structure supports the operating expenses of the system, while allocated income tax receipts support capital expenditures for water and sewer construction. Such an allocation of income tax receipts is pursuant to local ordinance and does not distinguish between water and sewer capital contributions. Although two separate funds exist, these dollars are available interchangeably. Since income tax revenues and not quarterly user rates will be used to repay the WPCLF loan, the economic impacts on local residents, associated with project implementation, are less than for communities without such a dual funding system.

Since repayment of the anticipated WPCLF loan will come from allocated income tax receipts for capital expenditures for water and sewer construction, the proposed project will have no effect on the wastewater rate structure or user charges.

#### **F. Project Schedule**

Construction is expected to begin in July 2015, and will take approximately 10 months to complete.

#### **G. Public Participation**

The City of Oregon holds regular council meetings, open to the public, where the proposed Sanitary Sewer Rehabilitation Project, Phase 3 project was discussed and voted on. The engineering reports and related information presented at these meetings identified the reasons for undertaking the proposed project, how the project would be constructed and operated, the costs involved with construction of the sewer rehabilitation, and sources of funding.

In addition, the following are Public Meetings and Notices that discussed the Oregon Sanitary Sewer Rehabilitation Project, Phase 3:

- October 21, 2013 – Committee of the Whole Meeting to discuss Authorizing the Mayor to submit application to the Ohio Public Works Commission for the Project.
- October 28, 2013 – Council Meeting to pass Ordinance to apply for OPWC funding

for the project.

Ohio EPA will issue a copy of its Limited Environmental Review (LER) decision and Finding of No Significant Impact to interested parties. Supporting documentation for the LER decision will be available for public inspection, upon request, from the City of Oregon and this Ohio EPA office.

#### **H. Interagency Coordination**

Because of the nature of the project, coordination with Ohio Historic Preservation Office and United States Fish and Wildlife Service was not required, although reviews of those resources were completed to determine that there will be no effect on either properties listed or properties eligible for listing on the National Registry of Historic Places, or threatened and endangered species.

#### **I. Conclusion**

The proposed improvements constitute a project type (rehabilitation of existing trunk and local sanitary sewers to reduce storm inflow and infiltration) that qualifies for a Limited Environmental Review. Specifically, the project involves the installation of a cured-in-place liner, including the lining of the existing manholes within the project limits, along with any spot repairs as needed.

This project meets the following additional LER criteria:

- It will have *no significant adverse environmental effect* and will require *no specific impact mitigation* because the entire project is located within the footprint of the existing sewers under the roadway, so no previously-undisturbed areas will experience any earthmoving activity. Furthermore, the construction mitigative measures detailed in the facilities plan dated December 17, 2013, and the general conditions of safety agreed to by Oregon, will further ensure that no significant adverse impacts will occur during the lining and replacement work.
- It will have *no adverse effect on high value environmental resources* because it will not involve any action outside the roadway, where high value resources could be present.
- It is *clearly cost-effective*, especially compared to the alternative of complete sewer and manhole replacement. The project will enable the City to eliminate the infiltration and suspected inflow sources that have created chronic back-ups and flooding of basements.
- It is *not controversial*, as no rate increase is necessary to pay for this project, and Ohio EPA is unaware of any opposition to it.
- It will *not create a new or relocate an existing sanitary discharge to surface or*

*ground water*, as it only involves improvements to the collection system to eliminate infiltration and suspected inflow sources that have created chronic back-ups and flooding of basements.

· It will *not* serve a larger area than the current service area tributary to the Oregon WWTP, nor will it result in an increase in the volume of discharge or the loading of pollutants beyond the design of the Oregon WWTP, since the project only involves installation of a cured-in-place liner in existing sanitary sewers, including the lining of the existing manholes within the project limits. These improvements will not adversely affect wastewater flows and loadings, though it could reduce wet-weather flows.

The proposed project is sufficiently limited in scope and meets all applicable criteria to warrant an LER. The planning activities have identified no potentially significant adverse short-term or long-term impacts on the human environment or sensitive resources, including land forms, floodplains, ground water, culturally significant sites, threatened or endangered species, wetlands, aquatic and terrestrial habitat, surface water, air quality, or state and federal natural areas, nor will it have secondary impacts (those related to new development served by improvements to a publicly-owned treatment works), such as the conversion of farmland to more intensive (i.e., residential/commercial) uses.

The proposed project will help ensure the structural integrity of the City's sewer system, as well as removing major sources of storm water infiltration and inflow, thereby eliminating a primary cause of sewage back-ups and flooding of basements. All sanitary sewer flows will continue to be transported to Oregon's WWTP for treatment.

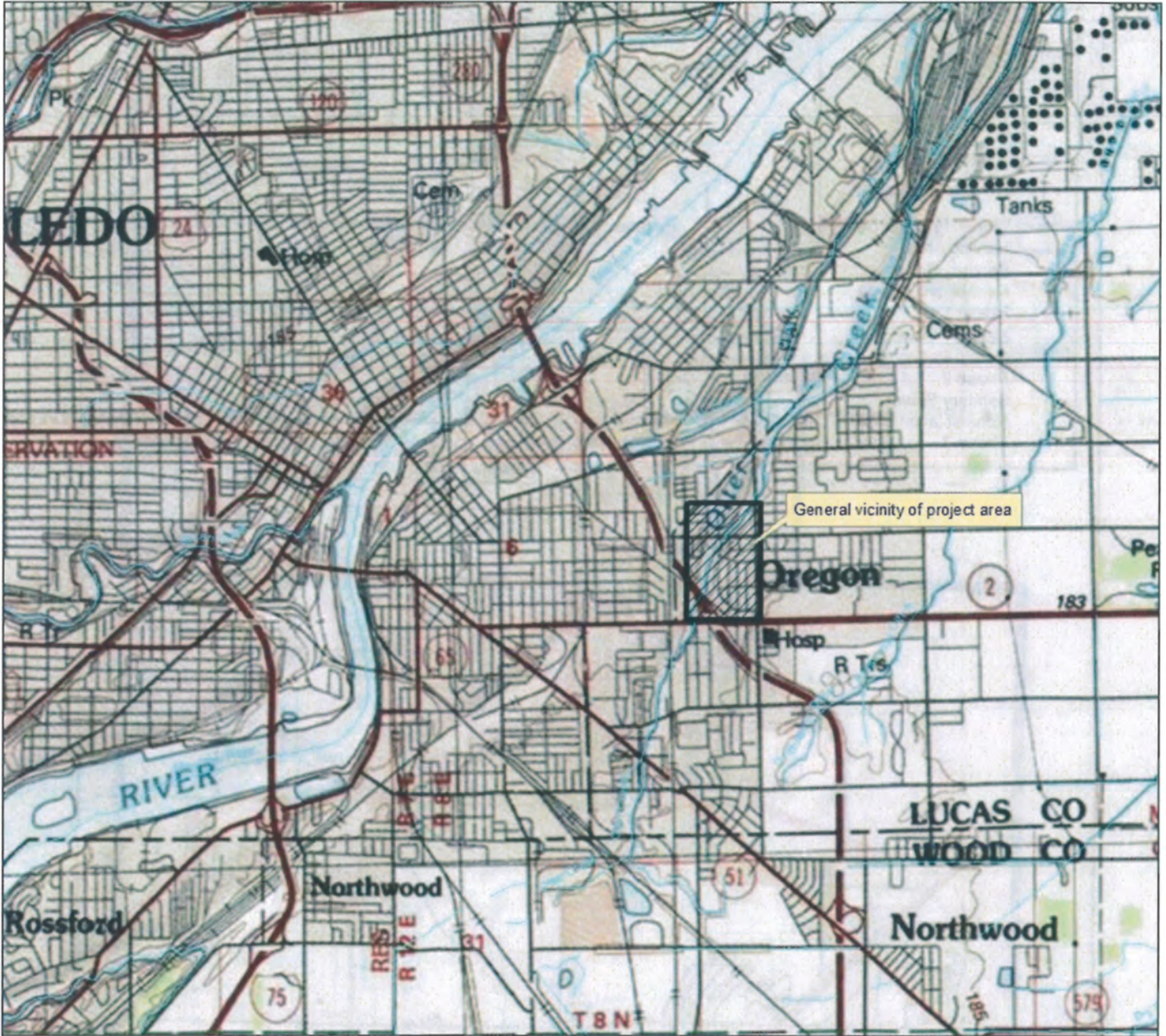
For further information, please contact:

Rahel Babb  
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50 West Town Street, Suite 700  
P. O. Box 1049  
Columbus, OH 43216-1049

Telephone: (614)-644-3711  
E-mail: [rahel.babb@epa.ohio.gov](mailto:rahel.babb@epa.ohio.gov)















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

May 12, 2015

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 Oregon  
Sanitary Sewer Rehabilitation Project, Phase 3  
WPCLF Loan Number CS390721-0016

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 Sanitary Sewer Rehabilitation Project, Phase 3 is a continuation of the sanitary sewer rehabilitation initiative as required by the City of Oregon Wastewater Treatment Plant's (WWTP) National Pollutant Discharge Elimination System (NPDES) permit. Generally, this project consists of the rehabilitation, including lining and general sewer repair, of 8-inch, 10-inch and 12-inch diameter vitrified clay pipe. The project also includes the rehabilitation of a 30-inch diameter trunk sanitary sewer, and the replacement or lining of 6-inch diameter service lines and lining of sanitary sewer manholes within the project area.

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 sewered community, which is for minor rehabilitation of existing facilities and infiltration and inflow correction.

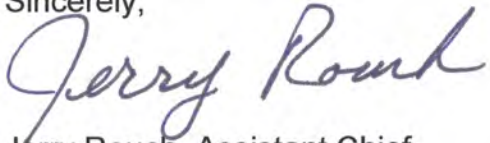
Furthermore, the proposed project:

- 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 blue ink that reads "Jerry Rouch". The signature is written in a cursive, flowing style.

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

Attachment