



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

**August 2, 2018**  
**Limited Environmental Review and Finding of No Significant Impact**  
**Akron Sanitary Sewer Reconstruction 2017**  
**Summit County**  
**WPCLF #CS390095-0147**

The attached Limited Environmental Review (LER) is for a wastewater treatment project in your area which the Ohio Environmental Protection Agency intends to finance through its Water Pollution Control Loan Fund (WPCLF) below-market interest rate revolving loan program. The LER describes the project, its costs, and expected environmental benefits. Making available this LER fulfills Ohio EPA's environmental review and public notice requirements for this loan program.

Ohio EPA analyzes environmental effects of proposed projects as part of its WPCLF program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. This project's relatively narrow scope and lack of environmental impacts qualifies it for the LER rather than a more comprehensive Environmental Assessment. More information can be obtained by calling or writing the person named at the end of the document.

Loan award will proceed without further environmental review or public comment unless new information shows that environmental conditions of 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

JR/DH

attachment

## LIMITED ENVIRONMENTAL REVIEW

### **A. Project Identification**

Project Name: Akron Sanitary Sewer Reconstruction 2017

WPCLF# CS390095-0147

Address: Daniel Horrigan, Mayor  
City of Akron  
166 South High St.  
Akron, Ohio 44308



### **B. Project Summary**

The City of Akron (Akron) in Summit County has requested financial assistance from the Ohio Water Pollution Control Loan Fund (WPCLF) to repair or replace degraded areas of the sanitary sewer system. The work will include replacement, repair, or cured in place pipe (CIPP) lining of existing sanitary sewer infrastructure at multiple places in Akron.

This loan allows Akron to cooperate with the Appalachia Ohio Alliance (AOA) and Twin City Water and Sewer District through the Ohio Water Resource Restoration Sponsor Program (WRRSP) to protect and restore high quality aquatic resources. The WRRSP funding will provide \$920,500 for the AOA Big Darby Creek Conservation Corridor Initiative purchase and protection of 188 acres of an important water resource-related habitat including 85 acres of Category 3 wetlands and 11,655 linear feet of stream in Darbyville (Pickaway County). Akron will also sponsor the Twin City Water and Sewer District lowhead dam removal in Uhrichsville for \$714,695, a restoration project that will improve the ecological health of Stillwater Creek. More information on the WRRSP projects is available from the contact named at the end of this document.

### **C. History and Existing Conditions**

Akron has combined sewers (pipes that in dry weather carry sanitary sewage only and during wet weather carry sanitary flows combined with storm drainage) in much of the city. When flows rise dramatically during and after rainfall, combined sewer overflow (CSO) structures divert untreated sanitary sewage mixed with storm water to area streams. Such discharges are threats to human health and the environment.

Due to these historical and ongoing CSO events and partial treatment bypasses from its Water Pollution Control Station (WPCS) to the Cuyahoga River, Akron is now subject to a federal Consent Decree that requires, among other improvements, sanitary sewer

rehabilitation to minimize entry of extraneous water (infiltration and inflow; “I/I”) that can cause or exacerbate overflow events.

This project is one of a sequence based on overall evaluations of the city’s sanitary sewer system that prioritized problem areas.

#### **D. Project Description**

This project involves rehabilitation of existing sanitary sewers with identified deficiencies throughout Akron (Figure 1). Construction involves sewer replacement / “point repairs” (removal and construction of short sections of sanitary sewer in the same trench where existing pipes are collapsed or structurally unsound), pipe rehabilitation with cured-in-place-pipe (CIPP), and associated manhole rehabilitation.

The CIPP process involves the insertion into the sewer of a fabric tube impregnated with a heat-setting resin. The lining is typically inserted via existing manholes, installed using water pressure, and cured by circulating hot water through the pipe; after the liner is intact, a robot cutter opens the existing lateral connection holes to allow wastewater to enter the sewer.

This seamless pipe prevents infiltration and exfiltration, restores structural integrity, and eliminates joints that can weaken and allow root intrusion. CIPP increases flow capacity because the new lining is much smoother than aged clay, brick, or concrete pipe. CIPP rehabilitation is a “trenchless technology” because the work is typically completed through existing manholes with minimal or no excavation required and minimal traffic disruption.

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

The total estimated project cost is \$8,451,271, of which Akron will borrow approximately \$7,025,000 from the WPCLF, and the remainder will be funded by an Ohio Public Works Commission (OPWC) loan and grant. In exchange for sponsoring the AOA and Twin City Water and Sewer District WRRSP projects, Akron will receive an interest rate reduction of 0.1% on the standard rate (currently 2.37%; the rate is set monthly and may change for a later loan), giving it a blended rate of 2.27%. During the 45-year loan period, Akron will save approximately \$2,723,687 by using WPCLF dollars, compared to the market rate of 3.52%.

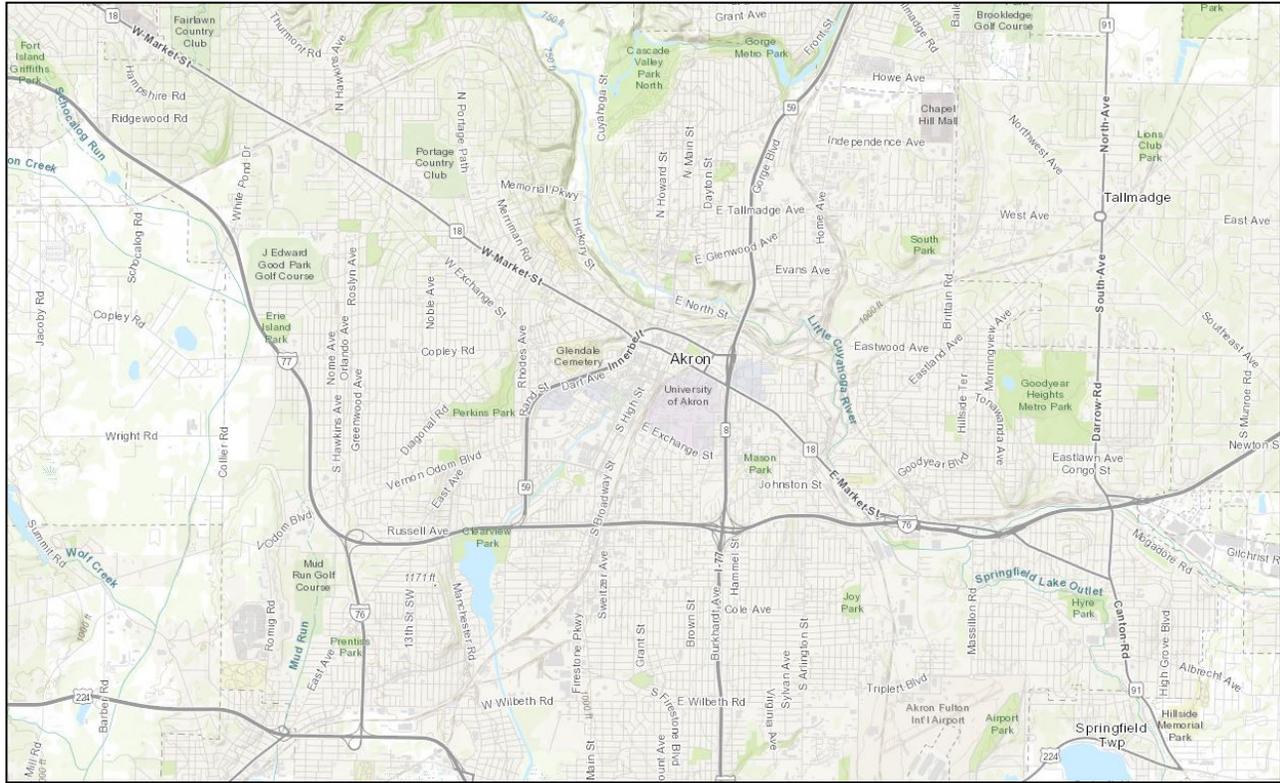


Figure 1 – Project Location (throughout Akron)

**F. Project Schedule**

Assuming WPCLF loan award August 2018, construction will begin in September 2018 and is expected to be completed in 180 days.

**G. Public Notification**

Legislation for this project’s construction loan was passed on January 19, 2018. The loan legislation requires a press release and Akron plans that release for August 2018. Akron also included this project on its “Drive Akron” webpage.

Property owners directly affected by the construction will be notified by direct mailings.

Ohio EPA is unaware of opposition to or controversy about the project.

Ohio EPA will also post the Limited Environmental Review (LER) Finding of No Significant Impact at <http://epa.ohio.gov/defa/ofa.aspx> under the “What’s New” tab in the “WPCLF Documents Available for Review and Comment” list and provide it upon

request. Documentation supporting the LER is available from the project contact at the end of this LER.

## **H. Planning Information**

Multidisciplinary comprehensive reviews for environmental and cultural resources were not required because the project will occur in existing streets or disturbed land and cause no change to the sewer service area.

## **I. Conclusion**

The proposed sanitary sewer improvement project is minor rehabilitation of existing facilities and infiltration and inflow correction that qualifies for a LER and meets the following additional criteria for a LER:

*It has no significant environmental effect; it does not require extensive specific impact mitigation; and it has no effect on high value environmental resources* – Construction activities for this project involve either no land disturbance (CIPP rehabilitation) or excavation in existing roads (areas that lack important environmental features) or minor excavation for manhole replacement in off-road areas. Erosion control best management practices will minimize the potential for significant soil movement during and after construction. Temporary traffic disruption during sewer replacement or other work in roadways will be minimized by use of standard construction traffic controls (flaggers, flashers, signs, and barrels).

The Indiana and northern long-eared bats have similar summer maternity and roosting habitat preferences (trees with large crevices or loose, sloughing bark greater than ten feet above the ground). Although the project area lacks trees with these characteristics, tree and vegetation removal will occur from October 1 through March 31 when bats are presumed absent from the area, so no adverse impacts to any of these threatened or endangered species is expected.

*It is cost effective and not controversial* – Akron has instituted a multi-year rate increase to pay for the numerous, sequential projects required by the federal Consent Decree. The typical residential annual sewer bill based on Akron's recent submittal to Ohio EPA is \$774, which is approximately 2.1% of median household income (MHI; \$35,240). A sewer bill less than 1.8% of MHI is typically considered affordable. The Ohio average residential sewer bill of \$655 is 1.2% of state MHI (\$53,301). This project requires no additional rate increase. By using the WPCLF low-interest financing for this project, Akron has minimized the cost and the economic impact on residents and the local economy of these federally-required public health and water quality improvement projects. Additionally, Ohio EPA is unaware of controversy about or opposition to this project.

*It does not create a new, or relocate an existing, discharge to surface or ground waters;*

*it 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; it will not provide capacity to serve a population substantially greater than the existing population* – This project will help minimize the discharge of pollutants by eliminating extraneous flows into sanitary sewers that could cause sewer overflow events. It will return the sanitary sewer system to its design capacity for conveying sewage and does not otherwise alter Akron's sewage collection or treatment systems.

The proposed project meets all applicable criteria for a Limited Environmental Review. 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 (surface waters, coastal zones, floodplains, wetlands, state-designated scenic or recreational rivers, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, threatened or endangered species, or state and federal wildlife areas). The project will help minimize potential threats to public health and aquatic life by reducing wet weather discharges from Akron's sanitary sewage collection system.

For more information, please contact:

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