



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

August 8, 2018

**FINDING OF NO SIGNIFICANT IMPACT
TO ALL INTERESTED CITIZENS, ORGANIZATIONS,
AND GOVERNMENT AGENCIES**

**PERRY COUNTY
REHOBOTH SANITARY SEWERS
CS390064-0002**

The purpose of this notice is to seek public input and comments on Ohio EPA's preliminary decision that a Supplemental Environmental Study is not required to implement the recommendations discussed in the attached Environmental Assessment of a general plan submitted by the entity mentioned above.

How were environmental issues considered?

The Water Pollution Control Loan Fund program requires the inclusion of environmental factors in the decision-making process. Ohio EPA has done this by incorporating a detailed analysis of the environmental effects of the proposed alternatives in its review and approval process. Environmental information was developed as part of the general plan, as well as through the general plan review process and during site inspections. The Agency's preliminary Environmental Assessment found that the project does not require the preparation of a Supplemental Environmental Study.

Why is a Supplemental Environmental Study not required?

Our environmental review concluded that significant environmental impacts will not result from the action. Any adverse impacts have either been eliminated by changes in the general plan or have been reduced by the implementation of the mitigative measures discussed in the attached Assessment.

How do I get more information?

A map depicting the location of the project is included as part of the Environmental Assessment. The Environmental Assessment presents additional information on the project, alternatives that were considered, impacts of the action and the basis for our decision. Further information can be obtained by calling or writing the contact person listed in the back of the Environmental Assessment.

How do I submit comments?

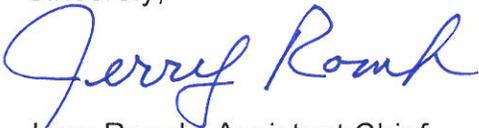
Any comments supporting or disagreeing with this preliminary decision should be submitted to me at the letterhead address. We will take no action on this general plan for 30 calendar days from the date of this notice in order to receive and consider any comments.

What happens next?

In the absence of substantive comments during this period, our preliminary decision will become final. The entity will then be eligible to receive loan assistance from this agency.

Please bring any information that you feel should be considered to our attention. We appreciate your interest in the environmental review process.

Sincerely,



Jerry Rouch, Assistant Chief
Division of Environmental & Financial Assistance

Attachment

**ENVIRONMENTAL ASSESSMENT
for
Perry County**

**Rehoboth Sanitary Sewers
Loan Number CS390064-0002**

**Applicant: James O'Brien, President
Perry County Board of Commissioners
121 West Brown Street, Suite C
New Lexington, OH 43764**

Project Summary

The Perry County Board of Commissioners has applied to the Ohio Water Pollution Control Loan Fund (WPCLF) to finance the Rehoboth Sanitary Sewers project, here forward referred to as the Rehoboth project. Rehoboth is an unincorporated community located along Route 345 in Clayton Township. The project area also includes an area south of Rehoboth and north of the Village of New Lexington. The proposed project includes gravity sewer lines, a sewer lift station, forcemain, and connection to New Lexington's wastewater collection and treatment system. The project is designed to correct unsanitary conditions related to several failing household sewage treatment systems (HSTS) that are discharging untreated or partially treated wastewater to drainage ditches and streams that drain into Rush Creek. The project has an estimated construction cost of \$1,100,000. The approximate construction schedule is October of 2018 through August of 2019.

Existing Conditions

The project area is an unincorporated community of approximately 32 homes and businesses in eastern Perry County. Rehoboth has been a primary concern of the Ohio EPA, Perry County Commissioners, and the Perry County Health Department for many years due to the lack of proper sanitary facilities. On-lot treatment systems primarily consist of septic tanks and leach fields, many of which are failing. As a result, sewage pollution in roadside ditches, storm sewers and adjacent streams is severe. Sampling and investigations within the project area by Ohio EPA have found high E. coli and fecal coliform values in surface water bodies due to inadequate or failing HSTS. These unsanitary conditions are a violation of Ohio's general water quality criteria set forth in Ohio Administrative Code (OAC) Rule 3745-1-04, and demonstrate the existence of a public health nuisance in accordance with OAC Rule 3745-1-04. Due to small lot sizes and unsuitable local soil conditions, it was determined that the replacement or repair of existing HSTS would not be a viable solution to remedy the unsanitary conditions. Based on these violations, Ohio EPA issued to Perry County Director's Final Findings and Orders (DFFO) on August 27, 2010, requiring a sewerage system and/or wastewater treatment works be constructed, maintained and operated to service the unsewered area.

Alternatives

Alternative 1, a "no-action" alternative is not feasible, since it would not eliminate the inadequate or failing HSTS within the Rehoboth project area which discharge raw or partially treated sewage into waters of the state, and since this alternative would violate the DFFO.

Alternative 2, which would involve the replacement of failing HSTS is not a feasible option due to small lot sizes for many of the properties and unsuitable local soil conditions, and since this alternative would violate the DFFO.

Alternative 3 includes the installation of a conventional gravity sewer system and a recirculating wastewater treatment filter plant. This alternative would require active management of the wastewater treatment plant by the county or its consultants. Construction and operation expenses related to wastewater treatment make this alternative significantly more expensive than Alternative 4.

Alternative 4 includes the installation of a conventional gravity sewer system, a sewer lift station, forcemain, and connection to New Lexington's wastewater collection and treatment system.

Selected Alternative

The Rehoboth project area will be served by a conventional gravity sewer collection system, which includes approximately 3,500-linear feet (LF) of 8-inch sewer pipe, 7,000-LF of 6-inch sanitary forcemain sewer pipe, sanitary lift station, and backup generator. The forcemain will discharge into an existing sanitary manhole owned by New Lexington's wastewater collection and treatment system. Waste from the Rehoboth project will be conveyed to New Lexington's wastewater treatment plant (WWTP), which consists of an extended aeration oxidation ditch system. The WWTP has a Peak Design Flow of 1,600,000 gallons per day (GPD), an Average Daily Design Flow of 875,000 GPD, and an Average Daily Flow of 550,000 GPD. The Rehoboth project is expected to contribute approximately 4,000 GPD of wastewater to the system, which will be well within the treatment capacity of the New Lexington WWTP. Once the Rehoboth system is operational, New Lexington will manage its operation and issue sewer bills to the project's households. When complete, this project will eliminate the environmental and public health issues related to the discharge of raw or partially treated wastewater into waters of the state and meet the DFFO requirements.

Implementation

The estimated construction cost of the proposed Rehoboth project is \$1,100,000, and borrowing that amount over 30 years at the current market rate of 3.44 percent would cost Perry County approximately \$1,772,000. However, Perry County will receive principal forgiveness (principal that does not need to be repaid) from the WPCLF in the amount of \$1,020,400 to address an unsewered area, leaving an estimated outstanding balance for the project of \$79,600. Perry County is eligible for a 30-year, zero-percent hardship loan from the WPCLF. Borrowing \$79,600 over 30 years at zero percent, as opposed to financing the total project amount at the current market rate of 3.44 percent, would save Perry County approximately \$1,693,000.

Environmental Impacts

The project has the potential to adversely affect the following environmental attributes, but the impacts will be avoided, mitigated or reduced to acceptable levels, as described below.

Surface Water or Ground Water Resources: The majority of the Rehoboth project area will not have significant adverse long-term impacts on surface water resources as there will be no in-water work, and no wetlands or scenic or recreational rivers are present in the project area. A portion of the project will be constructed within the 100-year floodplain. However, all structures within the floodplain will be below grade. All above-grade structures will be outside of the 100-year floodplain. The sanitary sewer will be excavated entirely within the existing roadway, including a directionally bored crossing under Route 345. The majority of excavation for the sewer forcemain will be performed in a mixture of roadways, road rights-of-way, areas of existing utilities, and driveways; which have previously been extensively excavated. Excavation for the project's sewer lift station will take place in a previously-disturbed area adjacent to a roadway intersection. A limited portion of the excavation for the forcemain will include areas of mature trees, scrubby trees and brush, that will require clearing and grubbing. Clearing activities are limited to those areas necessary for construction and the movement of construction equipment. Minor, short-term impacts from construction could occur. In the event of severe storms, the project location could be prone to runoff and deposition, necessitating the use of construction mitigation best management practices, as outlined in the detail plans. The project also includes locations with directional drilling installation of sewer pipe. A Stormwater Pollution Prevention Plan (SWPPP), which describes the measures that will be taken to prevent pollution caused by runoff into surface waters, is required, as is a frac-out contingency plan for horizontal drilling, which describes how inadvertent escapes of drilling slurry to the surface (known as "frac-outs") will be managed.

Dewatering of ground water to enable work below grade may be necessary. Engineering controls are part of the specifications to minimize the impacts of discharging pumped ground water to a river or stream.

The project contractor will obtain a Stormwater General Construction Permit and develop a SWPPP in accordance with the permit conditions, and will cover erosion and sediment controls, soil stabilization, dewatering, the prevention of pollution by fuels and other materials, and prohibited discharges that will be necessary to prevent water pollution. Additionally, the SWPPP will prohibit the placement of excess excavated material in wetlands, stream channels and floodplains; prohibit the deposition of material stockpiles, including temporary soil stockpiles, within the driplines of trees; and require measures to keep streets free of mud and soil. Provided the conditions in the General Construction Permit and SWPPP are followed, the project will have no long- or short-term adverse effect on surface waters and no significant adverse impacts to ground water is expected from construction of the project.

Terrestrial Habitat and Endangered Species: The US Fish and Wildlife Service (USFWS) indicates that the project is within the range of the endangered Indiana bat and northern long-eared bat (threatened). Trees within the project area include mature trees, scrubby trees and brush. Other mature trees are located outside of the work area and would provide alternative habitat. Tree removal will only be permitted to occur October 1 - March

31 or in coordination with USFWS, and tree trimming and removal is limited to only those trees necessary for completion of the project (e.g., trees within the excavation location or within the path of heavy equipment, etc.). These tree clearing restrictions will further ensure that any potential impacts to Indiana bats or northern long-eared bats are avoided.

While the species of concern bald eagle's range includes Perry County, they are not believed to be present in the project area. This is due to the project area's habitat (busy roadway, residential/maintained lots, commercial lots) not being conducive to the species as described on USFWS webpages. Therefore, we have determined that the project may affect, but is not likely to adversely affect, the bald eagle.

While the endangered American burying beetle can be found in Perry County they are not believed to be present in the project area. This is due to the project area's habitat (busy roadway, residential/maintained lots, commercial lots) not being conducive to the species as described on USFWS webpages. Therefore, we have determined that the project will have no effect on the American burying beetle.

While the threatened eastern massasauga can be found in Perry County they are not believed to be present in the project area. This is due to the project area's habitat (busy roadway, residential/maintained lots, commercial lots) not being conducive to the species as described on USFWS's webpages. Therefore, we have determined that the project will have no effect on the eastern massasauga.

Based on this, the project as designed will have no short- or long-term adverse impact on terrestrial habitat or endangered species.

Air Quality: Perry County is in attainment of the national ambient air quality standards (NAAQS) for ozone (smog), oxides of nitrogen (an ozone precursor), oxides of sulfur, lead, particulate matter and carbon monoxide. The operation of mobile construction equipment for this project will produce pollutant emissions in quantities too small, due to the limited scope and timeframe of construction, to place Perry County out of attainment of the NAAQS. These emissions will be reduced through the use of emission control equipment and the use of fuels that produce lower emissions of particulates, oxides of nitrogen and oxides of sulfur.

Operation of the sewer lift station and backup generators are expected to contribute minimal additional pollution to the project area. However, this addition is expected to be negligible compared to emissions produced by trucks and passenger vehicles on the busy routes of the project area.

Based on this, the project as designed will have no short- or long-term adverse impact on air quality.

Dust, Noise and Odors: These will be unavoidable but temporary effects of construction. Construction equipment noise and diesel odors will be controlled by the use of emissions equipment and mufflers. Dust will be suppressed as needed with water.

Operation of the sewer lift station and backup generator will contribute minimal additional long-term noise to the project area. This noise is expected to be negligible compared to noise produced by trucks and passenger vehicles on the busy routes of the project area.

Operation of the sewer lift station and backup generator will contribute minimal additional long-term odor to the project area. These odors are expected to be comparable or less than odors currently produced by failing HSTS.

Based on the above, the project will have no adverse impact on existing levels of noise, dust and odors.

Archaeological and Historical Resources: Excavation for the sanitary sewer, sewer lift station, and sewer forcemain will be performed primarily in roadways, road rights-of-way, areas of existing utilities, areas adjacent to homes, garages, driveways, and commercial businesses parking areas which have previously been extensively excavated.

Based on the project's alignment, and through review of State Historical Preservation Office (SHPO) mapping data, Ohio EPA has made a finding that the proposed project will have no effect on unrecorded archaeological sites or properties eligible to be or listed on the National Register of Historic Places.

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

Safety and Traffic: The detail plans require the use of typical traffic management measures during temporary lane closures. The length of time that driveways will be closed within the right-of-way for pipe installation will be minimized. Residents will be notified of street and driveway closures. Access will be maintained at all times for emergency vehicles. The project will not result in permanent traffic re-routing. Based on this, the project will have no significant adverse short- or long-term impact on local traffic patterns.

Local Economy: The median household income (MHI) for Perry County is \$42,017. Homeowners in the project area currently have private HSTS, so they have not previously been charged for sewer service. The estimated annual sewer bill, based on 7,756 gallons of monthly water use, is \$600.00. This represents 1.43% of the Perry County MHI, which is considered affordable.

Once the project is completed, the Perry County Health Department will give homeowners in the project area a Notification to Connect, requiring the connection of the residence to the sanitary sewer lateral and abandonment of the existing HSTS (disconnection, crushing and filling of the septic tank). Each of these actions is required to be performed by a licensed contractor and will be inspected by Perry County, which charges \$65 for its inspection. The estimated expense of installation of a sanitary sewer lateral and HSTS abandonment, if both actions are performed by single contractor as a single job, is \$1,500. Residents will be charged a tap fee of \$3,500. Perry County has applied for a CDBG grant to help defray the cost of tap fees for Low- and Moderate-Income (LMI) residents.

Public Participation

Ohio EPA issued Director's Final Findings and Orders (DFFO) to Perry County on August 27, 2010, requiring a sewerage system and/or wastewater treatment works be constructed, maintained and operated to service the unsewered area. Perry County has conducted numerous public meetings pertaining to this issue and they have been well attended by county officials and affected residents. Several residents have expressed opposition to being required to replace their HSTS with a public system and with the associated sewer and connection fees. However, the proposed project is the most affordable option for the county to address the Director's Final Findings and Orders. To date, no other significant issues have been identified during these meetings. Lastly, a public notice announcing the future availability of this Environmental Assessment will be posted on Perry County and Ohio EPA – Division of Environmental and Financial Assistance websites. The public notice for the Environmental Assessment will be open for a 30-day public comment period. Thus, there have been adequate opportunities for information dissemination and public participation.

Unaffected Environmental Features: The following environmental features will be unaffected by the project: the project is not intended to serve additional development, nor is development expected to occur in the project area; thus, farmland loss and secondary impacts will not be issues with this project.

The following agencies reviewed this project's planning information:

Ohio Environmental Protection Agency
Ohio Department of Natural Resources
U.S. Fish and Wildlife Service

Conclusions

Based on the planning documentation, associated correspondence and public participation, we find that the construction and operation of the sanitary sewers and wastewater treatment plant in the project area will have no adverse long-term effect on farmland, surface water, ground water, floodplains, wetlands, aquatic or terrestrial habitat, endangered species, state or federal wildlife areas, state-designated scenic or

recreational rivers, cultural properties, air quality or the local economy. It will have no long-term adverse effects with respect to noise, dust and odors. It will have long-term water quality benefits that will be associated with the replacement of failing HSTS with municipal sewage collection and treatment, and will eliminate a human health and environmental nuisance from exposure to raw sewage in local waterways.

For further information, please contact:

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Division of Environmental & Financial Assistance
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43216-1049

Phone: (614) 644-3713

E-mail: eric.schultz@epa.ohio.gov



Figure 1: Project Location (in red)

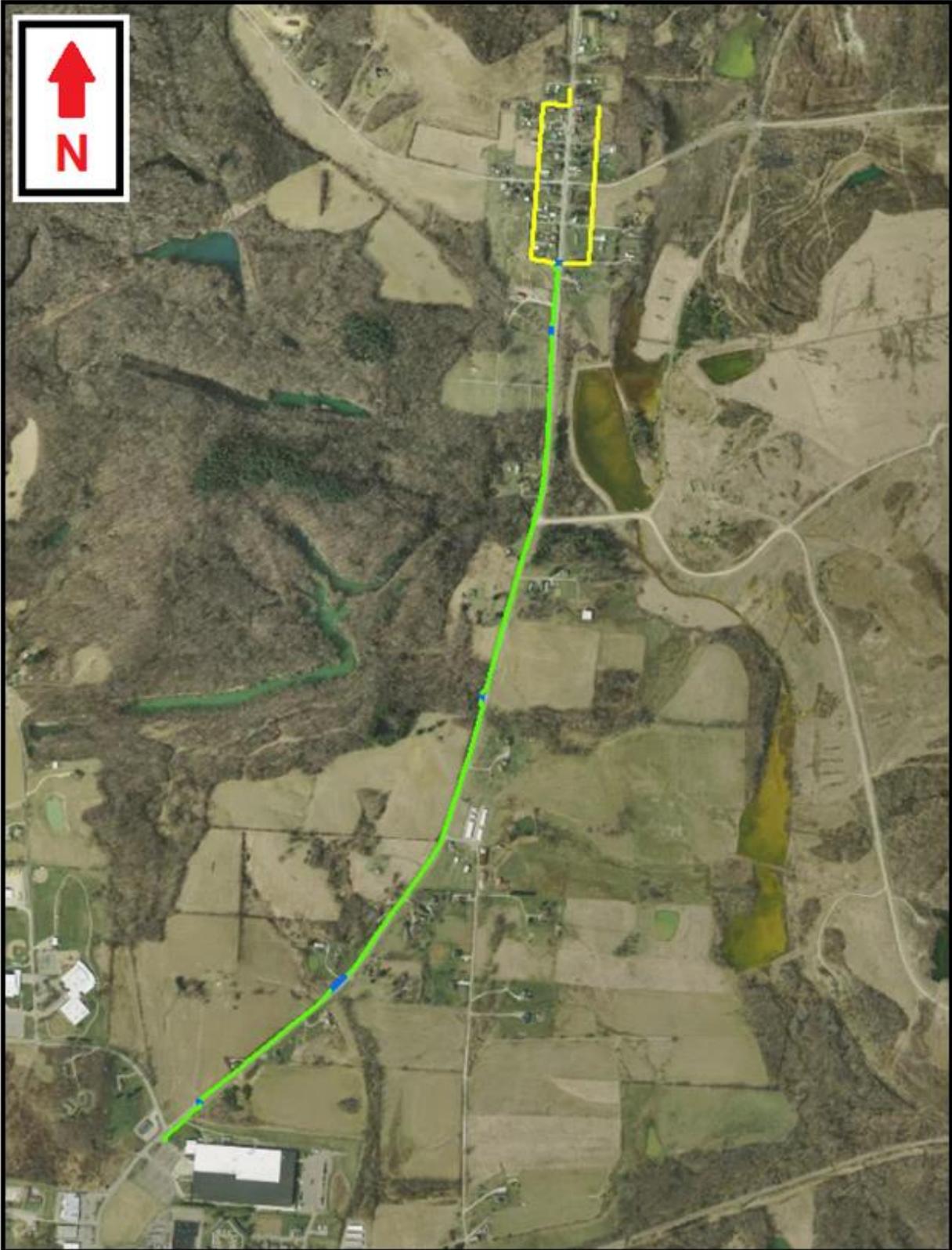


Figure 2: Project Location