May 1, 2019

Limited Environmental Review and Finding of No Significant Impact
City of Akron – WRF BioCEPT - NRD
Summit County
CS390095-0172

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,

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

Attachment
LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: City of Akron - Water Reclamation Facility Biological Chemically Enhanced Primary Treatment

Applicant: Daniel Horrigan, Mayor
City of Akron
166 S. High St., Room 200
Akron, OH 44308

Loan Number:CS390095-0172

Project Summary

The City of Akron, Summit County, applied for funding from Ohio EPA's Water Pollution Control Loan Fund (WPCLF) to finance the installation of a Biological Chemically Enhanced Primary Treatment (BioCEPT) system at its Water Reclamation Facility (WRF). The BioCEPT system will treat up to an additional 60 million gallons per day (MGD) of combined sewage when wet weather flows exceed the WRF's treatment capacity of 220 MGD. The total estimated loan amount for the project is $87,581,500.

The WPCLF loan allows Akron to sponsor six Water Resource Restoration Sponsor Program (WRRSP) projects. WRRSP projects address the protection or restoration of high-quality aquatic habitat in Ohio streams and/or wetlands. The sponsoring community benefits from sponsoring a WRRSP project by receiving up to a 0.1 percent reduction in its already below-market WPCLF interest rate.

The sponsored projects are: Struthers Dam Removal, implemented by City of Struthers; Cedar Run Watershed Initiative, Henson Addition Pain Creek Conservation Corridor Initiative, and Maxwell Addition – Big Darby Creek Conservation Corridor, all three implemented by Appalachia Ohio Alliance; and Conneaut Creek Conservation Project and Conneaut Creek/Smokey Run, both implemented by Ashtabula County Metro Parks.

The total cost of all sponsored projects is estimated at $4,552,420. Additional information for the listed WRRSP projects can be found in their individual environmental review documents available from the contact named at the end of this document.

History and Existing Conditions

The City of Akron owns and operates the WRF and combined sanitary sewer collection system. Akron’s combined sewer system currently drains over 96 square miles and serves approximately 330,000 people, including the neighboring communities of Cuyahoga Falls, Stow, Springfield, Mogadore, Lakemore, Tallmadge, Fairlawn, Bath, Montrose and other unincorporated areas. The daily average flow to the WRF was over 72 MGD in 2017.

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 (the Cuyahoga River, the Little Cuyahoga River and the Ohio Canal). Such discharges are threats to human health and the environment. Due to these historical and ongoing CSO events, Akron is currently implementing requirements set forth by a U.S. Environmental Protection Agency (USEPA) Consent Decree.

During storm events, Akron’s combined sewer system often generates flows in excess of the WRF’s capacity, resulting in overflow events or releases of untreated water. The addition of a BioCEPT system, which has a treatment capacity of an additional 60 MGD, will allow the WRF to treat wet weather flows in excess of 220 MGD, up to the peak design flow of 280 MGD.

Project Description

The addition of a BioCEPT system (see Figure 1) will allow for additional treatment capacity at the WRF. When WRF influent flows exceed 220 MGD, the BioCEPT system will be activated and excess flows will be diverted to the BioCEPT system for biological and chemical primary treatment and then disinfected before being discharged. The project will include installation of an associated pump station, influent and effluent flow meters, connective piping and Supervisory Control and Data Acquisition (SCADA) controls to operate the pump station. The BioCEPT system will provide 10 million gallons of flow equalization. This project will also install two new 5.25-million-gallon flow equalization tanks adjacent to the BioCEPT system.

Figure 1 – Akron WRF proposed BioCEPT location (yellow star)
Implementation

Akron will borrow $87,581,500 from the WPCLF program at a special nutrient reduction interest rate of 0.71%; which will be reduced to 0.7% after accounting for the 0.1% WRRSP reduction. During the 45-year loan period, Akron will save approximately $66,206,321 by borrowing WPCLF dollars at this blended rate, compared to the market rate of 3.29%. Akron plans to begin construction in spring of 2019 and complete construction by September 2021.

Public Participation

This project was included in Akron’s 2017 Capital Investment and Community Development Program, which was passed by the City Council on February 13, 2017. A local ordinance was passed on March 6, 2017, authorizing the Mayor to obtain WPCLF funds for this project. On January 15, 2019, Akron issued a news release requesting public comment on 2019 projects, including this one.

Ohio EPA will make a copy of this document available to the public on its web page (epa.ohio.gov/defa/ofa.aspx, WPCLF Documents for Review and Comment) and will provide it on request to interested parties. Information supporting this Limited Environmental Review (LER) is available from the project contact named below.

Conclusion

The entire project area has been previously disturbed during installation of and prior upgrades to the WRF. The project work will occur in a previously disturbed and maintained or mowed area, therefore no sensitive environmental resources, such as streams, wetlands, state or federal threatened or endangered species, or historical properties, will be impacted. If tree clearing is necessary, it will only be completed between October 1 and March 31. Standard construction best management practices will be used to address things like noise, dust, traffic disruption, and storm water runoff.

Ohio EPA conducts environmental review of all projects prior to approving WPCLF financing, ensuring projects do not have the potential to “individually, cumulatively over time, or in conjunction with other Federal, State local or private actions or have significant adverse effect on the quality of the human environment.” Such projects qualify for a Limited Environmental Review (LER). The proposed project involves repair or functional replacement of wastewater treatment facilities and therefore meets the following criteria for an LER:

- **It has no significant environmental effect and will require no specific impact mitigation** as sensitive resources such as floodplains, wetlands, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeological or historically significant sites, or threatened or endangered species are not present in the project area.

- **It has no effect on high-value environmental resources** because none are present in the project area, which is the existing WRF.

- **It is not a controversial action** as it will have no impact on sewer rates and there is no public opposition to the project.
• **Is cost-effective** as it will supplement the existing treatment system to help ensure compliance with combined sewer overflow elimination requirements.

• **It does not create a new, or relocate an existing discharge to surface or ground waters; and 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** since the proposed improvements to the treatment plant will have no effect on the location or volume of discharge and will actually decrease the amount of untreated releases and pollutants in discharge.

• **It will not provide capacity to serve a population substantially greater than the existing population** as the project improvements will not extend service to new customers or alter the influent flows to the plant.

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). Implementation of appropriate construction mitigation measures is required by the contract specifications and construction activity will be limited to the existing footprint of the WRF. The project will benefit the Akron WRF and combined sewer system by increasing treatment capacity during storm events and reducing untreated discharges into receiving waters.

For more information, please contact:

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