June 3, 2019

Limited Environmental Review and Finding of No Significant Impact

Village of Cardington – Morrow County
Water Treatment Plant Improvements
Loan number: FS390225-0012

The attached Limited Environmental Review (LER) is for a drinking water project in Cardington which the Ohio Environmental Protection Agency intends to finance through its Water Supply Revolving Loan Account (WSRLA) 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, as described in Ohio Administrative Code (OAC) 3745-150-05.

Ohio EPA analyzes environmental effects of proposed projects as part of its WSRLA 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, as described in OAC 3745-150-06. More information can be obtained by calling or writing the person named at the end of the attached LER.

Upon issuance of this Finding of No Significant Impact (FNSI) determination, award of funds may proceed without further environmental review or public comment unless new information shows that environmental conditions of the proposed project have changed significantly.

Sincerely,

Jonathan Bernstein, Assistant Chief
Division of Environmental and Financial Assistance

Attachment
LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Village of Cardington Water Treatment Plant Improvements

Applicant: Danny Wood, Village Administrator
            215 Park Ave.
            P.O. Box 10
            Cardington, OH 43315

Loan Number: FS390225-0012

Project Summary

The Village of Cardington, Morrow County, applied for funding from Ohio EPA's Water Supply Revolving Loan Account (WSRLA) to finance upgrades of the existing water treatment plant (WTP).

History and Existing Conditions

Cardington’s existing WTP was originally constructed in 1936 and later upgraded in 1965 and 1995. Many treatment processes are now past their useful life, resulting in water quality issues, such as elevated hardness, iron and manganese levels, as well as taste and odor issues. Additionally, the current ion exchange is loading finished water with brine causing increased sodium levels in finished water.

Project Description

The project will upgrade Cardington’s existing water treatment plant as follows:

- Replace 5 vertical pressure filters with 3 granular activated carbon (GAC) filters which will facilitate iron and manganese removal, help with taste and odor issues and help maintain resin quality of the downstream softeners
- Replace the existing 3 softeners with 3 more efficient ion exchange softeners and new resin which will help decrease the hardness of finished water
- Replace the existing brine tank with a new brine tank that has brine recovery which will decrease the sodium levels in finished water
- Replace 3 low service pumps
- Replace 2 high service pumps
- Replace aerator blower
- Replace main outflow valve
- Replace sanitary system manhole
- Install garage door
- Relocate chemical storage room
- Upgrade plant controls and install supervisory control and data acquisition (SCADA) system

**Figure 1** – Project location Railroad St., Cardington, Ohio (yellow arrow)

**Implementation**

The Cardington WTP will borrow an estimated $1,131,058 from the WSRLA program with an interest rate of 1.62%. During the 20-year loan period, Cardington will save approximately $235,173 by borrowing WSRLA dollars at this rate, compared to the market rate of 3.37%.

Cardington plans to begin construction in spring of 2019 and complete construction by the end of 2019.

**Public Participation**

This project has been discussed at several village council meetings over the last year, which are open to the public.
Conclusion

The entire project area has been previously disturbed during installation of and prior upgrades of the existing WTP. 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. No trees will be cleared as part of the plant upgrades. If tree clearing is necessary, it will only be done 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 an environmental review of all projects prior to approving WSRLA financing. Ohio EPA's State Environmental Review Procedure contains a special set of project review procedures for projects which 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 existing drinking water facilities and therefore meets the following criteria for an LER:

- **It has no significant environmental effect** 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 does not require extensive specific impact mitigation**, as the proposed project includes upgrades to an existing WTP in a previously disturbed and maintained area.

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

- **It is not a controversial action**, as it will have no impact on water rates.

- **Is cost-effective**, as it will upgrade pertinent components of the WTP that are past their useful life and necessary to ensure a safe drinking water supply.

- **It does not create a new, or relocate an existing discharge to surface or ground waters, and 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 since the proposed improvements to the water treatment plant do not involve a discharge point or include increases in volume.

- It does not create a new source of water withdrawals from either surface or ground waters, or significantly increase the amount of water withdrawn from an existing water source, nor will it provide capacity to serve a population substantially greater than the existing population as the project improvements were designed based on the plant's current maximum capacity with no effect on demand or treatment capacity.

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 the appropriate construction mitigation measure is required by the contract specifications and construction activity will be limited to the existing, previously disturbed WTP site. The project will benefit the Cardington public water system by providing improved water quality that is safe and reliable for residents.

For more information, please contact:

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