July 2, 2020

Limited Environmental Review and Finding of No Significant Impact

City of Columbus – Franklin County
PAWP Well Pump Replacement
Loan number: FS390274-0318

The attached Limited Environmental Review (LER) is for a water pump replacement project for the Parsons Avenue Water Plant in Columbus 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.

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. 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

Name: Columbus – PAWP Well Pump Replacement

Applicant: Tracie Davies, Utilities Director
City of Columbus
910 Dublin Road
Columbus, OH 43215

Loan number: FS390274-0318

Project Summary

The City of Columbus in Franklin County has requested $7,094,500 from the Water Supply Revolving Loan Account (WSRLA) for the replacement of well pumps located at the Parsons Avenue Water Plant to improve water treatment and distribution service.

History and Existing Conditions

The City of Columbus Division of Water operates three large municipal water treatment plants: Hap Cremean Water Plant, Dublin Road Water Plant, and Parsons Avenue Water Plant. The three facilities are interconnected by the water distribution system, but each is unable to maintain water to the entire distribution system alone. The Parsons Avenue Water Plant (PAWP) is a groundwater treatment plant with a capacity of 50 million gallons per day (MGD) and an annual average day flow of approximately 26 MGD. The PAWP provides water to approximately 200,000 customers across a service area generally consisting of the south portion of Franklin County that includes a mixture of residential, commercial, and light industrial users. The PAWP was originally constructed in 1981 and contains a total of six collector wells: four located along the Scioto River west of the treatment plant (#101, #103, #104, and #106), one well located along the Big Walnut Creek southeast of the plant (#115), and one located directly north of the plant (#120).

The collector wells were originally equipped with two vertical turbine pumps with a place for a third pump to be installed in the future. This third pump was added to collector wells #101, #104, and #115 in 1998, and #103 in 2017. Each of the pump assemblies includes a back pressure sustaining check valve which throttles the pump’s discharge to a desired flow selected by the operator. PAWP operators have historically had issues with these valves getting stuck in the open position and they require a relatively extensive amount of maintenance.

Project Description

Due to operational issues from age and deterioration, Columbus has elected to perform replacement work on existing well pumps located at the Parsons Avenue Water Plant. This project will include replacing the pumps, piping, valves, associated instrumentation, and electrical equipment in collector wells #101, #104, and #115, as well as address miscellaneous deteriorated items within these three well pump buildings such as grating and pipe supports. The pumps will be replaced with pumps of the same style, capacity, and dimensions.
The construction footprint for this project will remain within the confines of the existing water treatment plant, thereby minimizing effects on environmental resources. The contractor is responsible for best management practices to control erosion and sedimentation and minimize the creation of dust during construction.

Maps of the project location are provided in the exhibits below.

**Implementation**

**Project Costs**
Columbus plans to borrow $7,094,500 from the WSRLA. During the 20-year loan period, Columbus will save approximately $996,490 by using WSRLA dollars at the standard rate of 0.87%, compared to the market rate of 2.12%.

**Local Economy**
The current Columbus residential water bill is approximately $472/year. Projected residential water bills with the implementation of this and other associated water projects project are expected to increase to approximately $514/year, or approximately 1% of median household income (MHI) of Columbus, which is $49,478.

By using WSRLA financing for this project, Columbus has minimized the economic impact on customers.

**Project Schedule**
The anticipated loan award will occur in July 2020. Construction is expected to commence shortly after the funds have been awarded. Completion of the project and initiation of operation is expected to be completed by December 2022.

**Public Participation**
A public notice was posted on the City of Columbus' Public Utilities webpage detailing the proposed construction project. Contact information was provided for any public questions or concerns. Reviews of the respective environmental resources were completed by Ohio EPA, Division of Environmental and Financial Assistance (DEFA). The review agency does not oppose the project.

Ohio EPA will make a copy of this document available to the public on its web page: [http://epa.ohio.gov/defa/ofa.aspx](http://epa.ohio.gov/defa/ofa.aspx) (Under the "What's New" tab, scroll to: "Documents Available for Review and Comment – WSRLA Documents for Review and Comment") and will provide it upon request to interested parties. Information supporting this Limited Environmental Review (LER) is available from the project contact named below.

**Conclusion**
The proposed project meets the project type criteria for an LER; namely, it is an action for the replacement of existing treatment works. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

- **Has no significant environmental effect, no effect on high value environmental resources, and does not require extensive specific impact mitigation.**

  Construction for the project is limited to the previously disturbed footprint of the existing
WTP, which lacks important environmental features. Standard construction best management practices will be required to control dust, sediment runoff, noise, and maintain safety. Although construction will occur within the floodplain and floodway of the Scioto River and Big Walnut Creek, no new structures will be installed above the existing grade and the contractor will commit to take all necessary precautions to protect project work and equipment against flooding occurrences.

- **Is cost-effective and not controversial.**
  The proposed project is cost-effective as it involves seeking replacements to existing equipment so that efficiency can be improved. Operation and maintenance costs will decrease at the completion of this project from the decrease in required labor and maintenance. DEFA is unaware of any specific opposition to or controversy about this project that will improve the treatment and distribution of Columbus' drinking water.

- **Does not create a new, or relocate an existing, discharge to surface or ground waters; will not create a new source of water withdrawals from either surface or ground waters; will not significantly increase the amount of water withdrawn from an existing water source; 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.**
  This project involves the replacement of identical equipment within the footprint of the existing treatment plant. The project will not create a new source of water withdrawals, nor provide capacity to serve a population substantially greater than the existing population.

Based upon the available planning information for this project and the materials presented within this LER, Ohio EPA concludes that the proposed project will not result in any significant adverse impacts to any environmental features. 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 such as surface waters, coastal zones, riparian areas, floodplains, wetlands, state-designated scenic or recreational rivers, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, or threatened or endangered species.

This project will rehabilitate well pumps so the Parsons Avenue Water Treatment plant will operate more efficiently and continue to provide a safe delivery of potable water to the citizens of the city.

**Contact**

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