



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

May 20, 2021

Limited Environmental Review and Finding of No Significant Impact

**Jefferson County Water and Sewer District
Ridgeland Sewage Treatment Plant (STP) Replacement
Loan number: CS390041-0025**

The attached Limited Environmental Review (LER) is for a wastewater treatment project in Jefferson County 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 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

Jonathan Bernstein, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Ridgeland Sewage Treatment Plant (STP) Replacement

Applicant: Jefferson County Water and Sewer District
301 Market Street
Steubenville, OH 43592

Loan Number: CS390041-0025



Project Summary

The Jefferson County Water and Sewer District (JCWSD) has applied for funding through Ohio's Water Pollution Control Loan Fund (WPCLF) for the Ridgeland Sewage Treatment Plant (STP) Replacement project in Island Creek Township. The project is intended to correct current NPDES permit violations by replacing the existing deteriorated STP with a new precast concrete activated-sludge package treatment plant. The total estimated loan for the project is \$1,739,000.

History & Existing Conditions

The treatment facility is a 35,000-gallons per day (gpd) extended aeration package STP that was built in 1969. The facility serves approximately 46 households in the Ridgeland Subdivision. No new homes have been built in the service area of the STP since it was first constructed.

The STP is deteriorated and well beyond its useful life. Signs of structural deterioration have been ongoing for many years and include significant rusting of treatment tank components, masonry block displacement, and perimeter concrete upheaval and shifting. Additionally, the STP is in violation of National Pollutant Discharge Elimination System (NPDES) permit requirements.

An evaluation and report of the STP was submitted in 2016 by Arcadis U.S., Inc. This report provides detailed information on the evaluation of the existing plant and recommendations for correcting the present issues.

Project Description

The proposed JCWSD Ridgeland STP Replacement project involves the replacement of the deteriorated STP with a new precast concrete activated sludge package treatment plant adjacent to the existing treatment plant (Figure 1). The new treatment plant will be complete with a bar screen, blower building, standby power, flow meter, and aerobic digestion units. The approximate footprint of the new STP is 20 feet by 100 feet. Unlike the existing STP that is oversized for its daily demand, the new plant will be more appropriately sized for approximately 20,000 gpd. The new plant will be precast in two halves, allowing only one half to operate at any given time until flow warrants full plant operation; something the old STP was not capable of. The design capacity will also accommodate potential future service increases.

Implementation

JCWSD proposes to borrow the estimated amount of \$1,739,000 from Ohio's WPCLF to fund this project. Jefferson County qualifies for the standard WPCLF below-market interest rate (currently 0.75%; WPCLF loan interest rates are set monthly and may change for the requested July loan award). Additionally, Jefferson County is eligible to receive up to \$50,000 in principal forgiveness for the installation of back-up power (principal forgiveness funding for back-up power does not need to be repaid and is subject to availability and awarded on a first-come, first-served basis). Borrowing the estimated amount at 0.75% over 20-years could save Jefferson County approximately \$292,000 over the life of the loan compared to the current market rate of 2.0%.

The debt associated with this construction project will be recovered from monthly user charges. The typical sewer bill for residents served by JCWSD is \$560 annually. This is 1.2% of the median household income (MHI) of \$44,819, which is lower than the Ohio annual average sewer bill of \$715. Construction will start following loan award, and it is anticipated that funded facilities, as planned and designed, will be in full operation by June 2022.

Public Participation

Information regarding the proposed project has been made available to the public on the JCWSD web page. The Ohio EPA is unaware of any opposition to or controversy about the project.

Ohio EPA will make a copy of this document available to the public on its web page <https://epa.ohio.gov/defa/ofa#169638769-wpclf-documents-for-review-and-comment> and will provide it upon request to interested parties.

Conclusion

The proposed project meets the project type criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public wastewater treatment system, which involves the functional replacement of a sewage treatment plant. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect and will require no specific impact mitigation, as work will take place within the area previously disturbed during the construction of the existing STP. Additionally, the new STP will be placed adjacent to the existing treatment plant with no anticipated expansion outside of the footprint of the property. There will be no significant adverse effects as a result of project implementation or need for additional mitigation measures beyond standard construction best practices and traffic control measures.

Will have no effect on high-value environmental resources, as the project area is a mowed lawn containing no wetlands, streams, floodplains, suitable habitat, or other valuable resources. Ground disturbance will not be an issue, as the area has been previously graded to level the area during construction of the existing STP.

Is cost-effective because the proposed replacement of the existing STP with a new precast package treatment plant is financially and technically preferable to the alternative. In addition to replacement, an alternative to abandon the present STP and connect to the City of Toronto sewer system was considered. This would involve construction of a new pump station, approximately 1,000 lf of force main, and roughly one mile of gravity sewer main. The additional wastewater flows from this project

would enter the Jeddo Run System and impact Toronto's South Pump Station, which has an active wet weather overflow presently in existence. Toronto is under a long-term control plan with the Ohio Environmental Protection Agency, so acceptance of additional flows would require approval. The additional construction, cost, and difficulty of this alternative makes it less favorable.

Is not a controversial action, as replacement of the deteriorated STP will create safer conditions and correct current NPDES permit violations. The new STP will be sized more appropriately to operate with higher efficiency, and it will have reserve capacity to provide for potential future growth. Additionally, Jefferson County has not increased sewer rates since 2011 and does not plan to increase rates over the next two years.

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 existing discharge to the unnamed tributary of Wildcat Hollow will remain the same. Also, the project will correct current NPDES permit violations and improve the quality of STP discharge.

Will not provide capacity to serve a population substantially greater than the existing population, as the primary purpose of this project is not related to serving new growth or increasing growth. While the new STP will have reserve capacity for future growth and Toronto has indicated an interest in potentially connecting Wallace Heights Subdivision in the future, no new homes have been built in the service area of the Ridgeland STP since it was first constructed, and Jefferson County has no known plans for any extensions.

In summary, the planning activities for the JCWSD Ridgeland STP Replacement 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 human environment or on sensitive resources (surface water, ground water, air quality, floodplains, wetlands, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeological or historically significant sites, federal or state-designated wild, scenic, or recreational rivers, federal or state-designated wildlife areas, or threatened or endangered species). Typical construction impacts such as noise, dust, and exhaust fumes will be short-term and addressed using standard construction best management practices.

The proposed project has been determined to be the most cost-effective way to address the deteriorated and non-compliant Ridgeland STP. The project will allow JCWSD to efficiently and effectively treat wastewater flow from the Ridgeland Subdivision to return to compliance with NPDES permit requirements and create safer conditions. Also, by using WPCLF below-market interest financing, JCWSD has minimized the project cost and cost to residents.

Contact information

Brody Betsch
Ohio EPA - DEFA
50 W. Town St., Suite 700
Columbus, Ohio 43216-1049
brody.betsch@epa.ohio.gov



Figure 1. Location of Ridgeland STP near Ridgeland Dr. and E. Ridgeland Dr.