



August 30, 2023

Limited Environmental Review and Finding of No Significant Impact

**Jefferson County
J and Bloomingdale Water Storage Tanks Rehabilitation
Hammondsville Water Storage Tank Rehabilitation
Loan numbers: FS390041-0038, FS390041-0037**

The attached Limited Environmental Review (LER) is for a drinking water project in Jefferson County 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

Jonathan Bernstein, Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Projects: J and Bloomingdale Water Storage Tanks Rehabilitation
Hammondsville Water Storage Tank Rehabilitation

Applicant: Jefferson County
301 Market Street
Steubenville, Ohio 43952

Loan Numbers: FS390041-0038, FS390041-0037



Figure 1. Jefferson County

Project Summary

Jefferson County (Figure 1) has requested \$1.95 million from the Ohio Water Supply Revolving Loan Account (WSRLA) to fund the J and Bloomingdale Water Storage Tanks Rehabilitation project and \$1.2 million to fund the Hammondsville Water Storage Tank Rehabilitation project. These projects include the rehabilitation of and improvements to three water storage tanks within Jefferson County's public water system (PWS). Through completion of these projects, Jefferson County will extend the useful life of the tanks, bring the tanks up to modern design standards, and ensure continued safe and reliable water service to area customers.

History & Existing Conditions

The Jefferson County PWS does not have their own drinking water source or operate a water treatment plant. Instead, Jefferson County purchases water from various suppliers including the Brilliant Water and Sewer District, the Village of Tiltonsville Water and Sewer Department, the Village of Mingo Junction Water Department, the City of Steubenville Water Department, and the City of Toronto Water Department. In total, Jefferson County serves 8,000 customers throughout five general service areas (i.e., the A, G, J, M, and O service areas) including customers in the New Alex, Tiltonsville, Mingo Junction, Overlook, Toronto, Steubenville, Wintersville, East Springfield, Amsterdam, Hammondsville, and Bloomingdale areas. Jefferson County distributes purchased water through a distribution system consisting of piping, booster stations, and storage tanks. The system includes a total of 17 storage tanks that provide water storage and maintain adequate working pressures.

In 2021, three of the county's storage tanks, the J Tank, Bloomingdale Tank, and Hammondsville Tank, were inspected.

J Tank

The J Tank (Figure 2) is a 100,000-gallon elevated water storage tank constructed in 1970. The J Tank serves 631 individuals in the Mingo Junction area, referred to as the J service area. The service area is predominantly residential. Results of the inspection show that the structural integrity of the tank is sound, but there is damage to secondary structural members caused by ice build-up that occurred due to a previous leak that took place in the winter. The tank needs comprehensive repair and repainting to address needed steel repairs and safety, sanitary, vulnerability, and compliance

upgrades. Additionally, the tank's exterior coating was found to contain lead. The original lead-containing interior coating was removed during a previous project.

Bloomington Tank

The Bloomington Tank (Figure 3) is a 300,000-gallon non-elevated water storage tank constructed in 1984. The Bloomington Tank serves 576 individuals in the Bloomington area, which is part of the overall M service area. The service area is predominantly residential. Results of the inspection show deficiencies associated with safety, security, sanitary, vulnerability, and compliance. Additionally, the tank's exterior coating was found to contain lead. The tank's interior coating contains lead below the EPA threshold, but barium levels were found to be above acceptable levels.

Hammondsville Tank

The Hammondsville Tank is a 200,000-gallon non-elevated water storage tank, similar to the Bloomington Tank. The age of this tank is unknown. The Hammondsville Tank serves 504 individuals in the Hammondsville and Irondale neighborhoods, which is part of the overall M service area. The service area is predominantly residential with a small manufacturing facility in Irondale. Additionally, this tank's exterior coating was found to contain lead. The original lead-containing interior coating was removed during a previous project.

See Figure 4 for locations of the three tanks. Jefferson County intends to complete necessary repairs and recommended upgrades to these tanks as described in the 2021 inspection report.

Project Description

J Tank

Planned improvements to the J Tank include replacement of the roof ventilator, new manways, upgrades to ladders and platforms, pit repairs, and full blast and recoat of exterior and interior coatings. A new mixing system will be installed within the tank. The cast iron water main that currently feeds the tank will be replaced from the roadway to the tank, a new gate valve and fire hydrant assembly will be added to allow draining of the tank, and a new sample tap will be installed on site. The existing fence and gate will be replaced, and various electrical improvements will be completed.

Bloomington Tank

Planned improvements to the Bloomington Tank include repair and recoat of the foundation, interior and exterior steel repairs, full blast and recoat of exterior and interior coatings, ladder and cage upgrades, and replacement of the roof vent and overflow pipe. A fire hydrant assembly will be installed to allow draining of the tank. New supervisory control and data acquisition (SCADA) will be installed on site, and various electrical improvements will be completed.



Figure 2. J Tank

Hammondsville Tank

Planned improvements to the Hammondsville Tank include repair and recoat of the foundation, replacement of the roof ventilator, and ladder and manway upgrades. The overflow pipe and pit will be repaired, along with full blast and recoating of exterior and interior coatings. The valve vault will receive maintenance, and a new mixing system will be installed. A fire hydrant assembly will be added to allow draining of the tank, and a new sample tap will be installed on site. The existing fence and gate will be replaced, and various electrical improvements will be completed.



Figure 3. Bloomingdale Tank

Implementation

Jefferson County proposes to borrow \$1.95 million to fund the J and Bloomingdale Water Storage Tanks Rehabilitation project and \$1.2 million to fund the Hammondsville Water Storage Tank Rehabilitation project from the Ohio WSRLA. Funds will be borrowed at the standard rate of 2.86 percent (interest rates are set monthly and may change for the requested September 2023 and May 2024 loan awards) to cover costs of construction for the projects. Borrowing these amounts in WSRLA monies could save Jefferson County roughly \$514,000 and \$316,000, respectively, over the 30-year loan terms compared to the current market rate of 4.16 percent. Jefferson County also expects to receive funding in the amount of \$800,000 from the Ohio Public Works Commission for use towards the J and Bloomingdale Water Storage Tanks Rehabilitation project.

The debt associated with the projects will be recovered from monthly user charges. The water service charges for Jefferson County are driven by the total indebtedness of Jefferson County and annual operation and maintenance costs as opposed to the specific indebtedness of any particular project. Jefferson County last raised their water rate in 2022 and reports that the average annual residential water bill is \$746. This represents 1.59 percent of the median household income for Jefferson County (MHI; \$46,849) and is greater than the Ohio average annual water bill of \$697. Under the current rates resolution, Jefferson County's minimum monthly water bill is scheduled to increase by 3 percent in 2025, 2027, and 2029.

Construction of the J and Bloomingdale Water Storage Tanks Rehabilitation project is expected to begin following loan award in September and is expected to reach substantial completion within 270 days of construction start. Construction start and end dates for the Hammondsville Water Storage Tank Rehabilitation project will be determined once final design is completed.

Public Participation

Jefferson County provides information on their water system and current and past projects, including the J and Bloomingdale Water Storage Tanks Rehabilitation project, on their website: <https://www.jcwatersewer.com/>. It is expected that Jefferson County will inform customers by similar means for the Hammondsville Water Storage Tank Rehabilitation project once design is complete and the project progresses further towards construction.

Ohio EPA is unaware of significant controversy about or opposition to this project. Ohio EPA will make a copy of this document available to the public on the following webpage and will provide it upon request:

Conclusion

The proposed projects meet the criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public water system, which involves the rehabilitation of and improvements to existing water storage tanks. Furthermore, the projects meet the other qualifying criteria for an LER; specifically, the proposed projects:

Will have no significant environmental effect, will have no effect on high-value environmental resources, and will require no specific impact mitigation. Due to the presence of lead and barium in some of the tanks' exterior and interior coatings, the contractor will be required to implement all applicable abatement protocols for safe containment and disposal of waste created during removal of the existing coatings.

The project is within the range of several state and federally listed threatened and endangered bat species (Indiana bat, northern long-eared bat, little brown bat, and tricolored bat). During summer months these species roost in trees with loose and exfoliating bark, crevices and cavities, and within leaf clusters. Some tree removal adjacent to the access drive is expected necessary for work at the J Tank site. Jefferson County will restrict tree clearing to between November 15 and March 15, as opposed to the regular clearing season of October 1 to March 31 typically recommended by U.S. Fish and Wildlife Service and Ohio Department of Natural Resources, as an extra measure of protection due to records of underground coal mining activities in the area. Mining operations act as potential hibernacula and extend the period during which bat species can be found utilizing nearby trees.

Construction will otherwise only affect the storage tanks and take place on cleared, surrounding areas adjacent to the tanks where there is no unique, sensitive, or otherwise valuable environmental resources. Based on the nature and location of the project, no other specific measures in addition to standard construction best management practices (i.e., controls for erosion, sediment, traffic, dust, noise, etc.) are anticipated to be necessary.

Is cost effective. The existing tanks are structurally sound making rehabilitation and improvement of the tanks a less-obtrusive and more cost-effective alternative rather than demolition and replacement.

Is not a controversial action. The nature of the projects is such that there will be no significant adverse impacts to residents or the environment, and no significant opposition to the project has been reported.

Does not create a new or relocate an existing discharge to surface or ground waters, 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, does not substantially increase the volume of discharge or 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. The projects merely involve the rehabilitation of and improvements to water storage tanks that serve existing customers and will not otherwise affect Jefferson County's PWS (e.g., storage, distribution, usage, etc.) or the PWSs (e.g., withdrawal, treatment, distribution, etc.) from which Jefferson County purchases water.

To conclude, Jefferson County's proposed projects are sufficiently limited in scope and meet all applicable criteria to warrant an LER. The planning review of this project identified no potentially short-term or long-term adverse impacts on the quality of the human environment and on sensitive resources (surface waters, coastal zones, floodplains, wetlands, state-designated scenic and recreational rivers, prime and unique agriculture lands, aquifer recharge zones, archaeological and historically significant sites, threatened and endangered species, and state and federal wildlife areas). Rather, completion of the projects will have long-term benefits associated with the provision of safe and adequate water supply to support the needs of local Jefferson County water customers.

Contact Information

Brody Betsch
Ohio EPA-DEFA
PO Box 1049
Columbus, Ohio 43216-1049

Email: brody.betsch@epa.ohio.gov

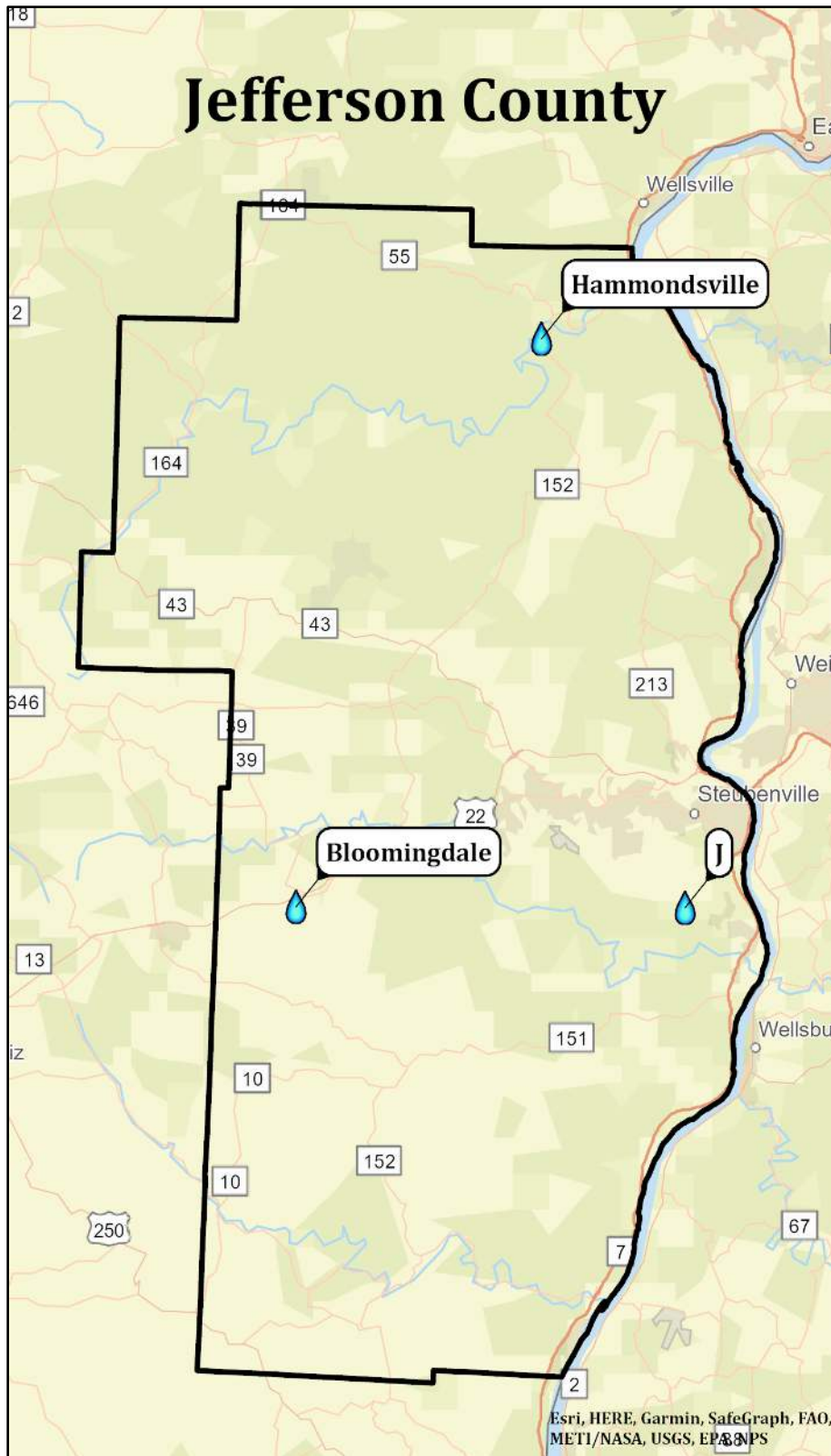


Figure 4. Project tank locations across Jefferson County