



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

September 17, 2015

**Notice of Issuance of a Limited Environmental Review and Final  
Finding of No Significant Impact to All Interested Citizens,  
Organizations and Government Agencies**

**City of Oregon  
WWTP Secondary Treatment Improvements, Phase 2  
WPCLF Loan Number CS390721-0015**

The purpose of this notice is to advise the public that Ohio EPA has reviewed the above-referenced project and finds that neither an Environmental Assessment (EA) nor a Supplemental Study (SS) is required to complete the environmental review of the project. Instead, this project meets the criteria for a Limited Environmental Review (LER). These criteria are summarized below in this document and in the attached LER.

In accordance with the City of Oregon's National Pollutant Discharge Elimination System permit (2PD00035\*MD), the City is required to increase the secondary treatment capacity of the wastewater treatment plant (WWTP) in an effort to eliminate secondary treatment bypass and sanitary sewer collection system overflows during wet-weather events. In accordance with the NPDES Compliance Schedule, the project will be constructed in two phases over the next five years. Phase 1 is complete and involved the replacement of two influent screens, two blowers, air lines, and air diffusers, as well as improvements to the raw wastewater pumping, including the addition of a sixth pump. Upgrades to the wastewater monitoring system software were also made during this phase. Phase 2 consists of the construction of a new final clarifier with associated secondary sludge pumping facilities; aeration tank improvements consisting primarily of replacement of stop plates and slide gates; disinfection improvements involving replacement of the chlorine feed and safety equipment; effluent pump replacement and improvements; site restoration; and associated wastewater monitoring system software upgrades.

The LER was completed for this project as it will not individually, cumulatively over time, or in conjunction with other Federal, State, local, or private actions have a significant adverse effect on the quality of the human environment. Consequently, a Finding of No Significant Impact can be issued now for this project.

The Water Pollution Control Loan Fund (WPCLF) program requires the inclusion of environmental factors in the decision-making process for project approval. Ohio EPA has done this by incorporating a detailed analysis of the environmental effects of the proposed action in its review and approval process. Environmental information was developed as part of the facilities planning process. A

subsequent review by this Agency has found that the proposed action does not require the preparation of an EA or an SS.

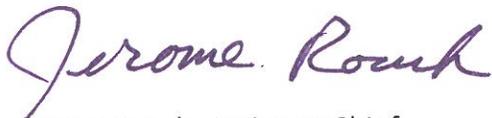
Our environmental review concluded that because the proposed project is limited in scope and meets all applicable criteria, a Limited Environmental Review is warranted. Furthermore, the proposed project:

- *has no significant environmental effect;*
- *does not require extensive specific impact mitigation;*
- *has no effect on high value environmental resources;*
- *is cost effective;*
- *is not a controversial action;*
- *does not create a new, or relocate an existing discharge to surface or ground waters;*
- *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.*

A map depicting the location of the project is included as part of the LER. The LER presents information on the proposed project, its costs, and the basis for our decision. Further information can be obtained by calling or writing the contact person listed on the back of the LER.

Upon issuance of this determination, a loan award may proceed without being subject to further environmental review or public comment, unless information is provided which determines that environmental conditions for the proposed project have changed significantly.

Sincerely,

A handwritten signature in purple ink that reads "Jerome Rouch". The signature is written in a cursive, flowing style.

Jérôme Rouch, Assistant Chief  
Division of Environmental and  
Financial Assistance

Attachment

# LIMITED ENVIRONMENTAL REVIEW

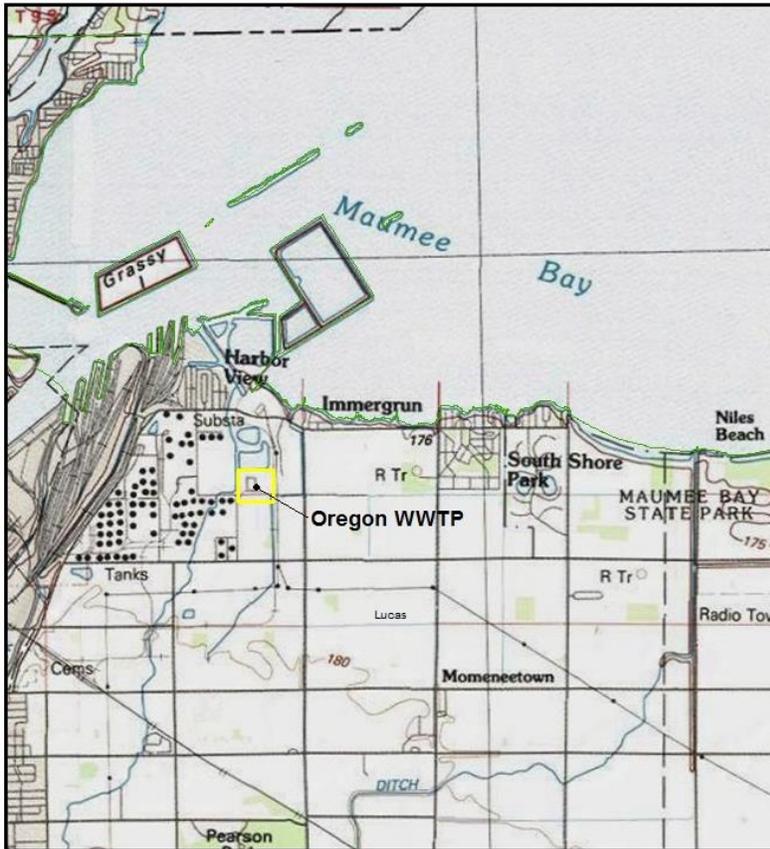
## Project Identification

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Name: City of Oregon  
WWTP Secondary Treatment Improvements, Phase 2

Address: City of Oregon  
Attn: Paul Roman, P.E., Director of Public Service  
5330 Seaman Road  
Oregon, Ohio 43616

WPCLF No.: CS390721-0015



### General Project Location

City of Oregon  
Lucas County

Wastewater Treatment Plant  
Secondary Treatment  
Improvements, Phase 2

WPCLF Loan No.  
CS390721-0015



## Existing Conditions and Need

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The City of Oregon owns and operates a Wastewater Treatment Plant (WWTP) located at 1570 Dupont Rd in Oregon (as shown above). The WWTP has a rated, average-daily design flow and peak secondary treatment capacity of 8.0 million gallons per day (MGD) and 24.0 MGD, respectively. The daily flow received at the plant currently averages about 6.5 MGD. The treatment plant originally went into operation in 1977 and, since that time, has undergone a series of improvements and additions. Treatment is performed using the activated sludge process followed by chlorination/dechlorination, and sludge is treated using aerobic digestion. Treated effluent is pumped through a 36-inch diameter force main well out into Maumee Bay/Lake Erie. Digested sludge is spread by injection, in liquid form, on agricultural land.

The sanitary sewer service area covers the City of Oregon and portions of eastern Lucas County, the Village of Harbor View and portions of northern Wood County. The collection system tributary to the Oregon WWTP receives excessive infiltration and inflow (I/I), which results in one or more of the following: collection system overflows; surcharging of sewers; hydraulic overloading of lift stations; and sewage flows at the treatment plant that cause poor treatment plant performance and secondary bypasses. To address this issue, Ohio EPA required that the City evaluate the options available to greatly reduce or eliminate the sanitary sewer overflows. Through that analysis it was determined that the best course of action would be to increase the plant's secondary wet weather treatment capacity from the current peak rate of 24.0 MGD to the hydraulic capacity of 36.0 MGD.

## Project Description

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The Oregon WWTP Secondary Treatment Improvements project consists of the replacement of equipment deemed necessary and prudent to meet the requirements contained in the facility's National Pollutant Discharge Elimination Systems (NPDES) permit to increase the plant's secondary treatment capacity from the current peak of 24.0 MGD to the hydraulic capacity of 36.0 MGD. The intent of the project is to eliminate sanitary sewer overflow discharges through an increase in the wet weather capacity of the WWTP, thus providing a positive environmental benefit to Lake Erie, and, as such, will not result in substantial increases to the volume of discharge or the loading of pollutants from an existing source.

The implementation of improvements has been divided between two phases. In the first phase, which has been completed, two influent screens were replaced; raw wastewater pumping was improved, including the addition of a sixth pump; two blowers, airlines and air diffusers were replaced; and related SCADA system<sup>1</sup> were upgraded.

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<sup>1</sup> SCADA (or Supervisory Control and Data Acquisition) is a type of industrial (computer-controlled) system used, in this instance, to monitor and control wastewater collection and treatment processes.

The Phase 2 project improvements consist of a new final clarifier with associated secondary sludge pumping facilities; aeration tank improvements consisting primarily of replacement of stop plates and slide gates; disinfection improvements involving replacement of the chlorine feed and safety equipment; effluent pump replacement and improvements; site restoration; and associated SCADA upgrades.

### **Estimated Project Costs**

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The proposed Oregon WWTP Secondary Improvements, Phase 2 project is expected to cost approximately \$7,389,789.00 of which \$1,600,000.00 will be paid for with Ohio Public Works Commission<sup>2</sup> funding. The remainder of project costs, \$5,789,789.00, is expected to be funded with a low-interest loan through the Water Pollution Control Loan Fund (WPCLF), administered by Ohio EPA.

### **Nutrient Reduction Discount**

In 2015, Ohio EPA is offering \$100 million in zero-percent interest rates to projects whose goals are to reduce nutrients in the discharge. Oregon's proposed project includes aeration tank hydraulic improvements; a new final clarifier and secondary sludge pumping improvements; effluent disinfection improvements; effluent pumping station improvements; and related SCADA system upgrades.

At the Oregon WWTP, 100 percent of the nutrient removal is accomplished in the secondary treatment facilities. Therefore, 100 percent of the improvements that are related to improving the secondary treatment process are eligible for designation as nutrient removal facilities. Those improvements represent 91.39 percent of the bid price.

The other 8.61 percent of the bid price is for improvements that are not directly related to improving the secondary treatment process and are considered as non-nutrient removal facilities. These costs qualify for the standard, below-market interest rate, which is currently 2.24 percent (effective for loan awards in September 2015).

Combined, the interest rate for this project will be approximately 0.19 percent. Compared to the September 2015, market rate of 3.45 percent a total savings of approximately \$2,159,813 will be realized by financing through the WPCLF.

As per the 2013 Annual Residential Sewer Rates Survey (based on use of 7,756 gallons per month or 1,037 cubic feet per month), the average annual sewer rate for an Oregon household is \$513. As per the 2008 - 2012 American Community Survey, the median household income (MHI) for the City of Oregon with a population of 20,229 was \$52,260. Therefore, the current

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<sup>2</sup> The OPWC provides financing for local public infrastructure improvements through both the State Capital Improvement Program (SCIP) and the Local Transportation Improvement Program (LTIP). SCIP is a grant/loan program for roads, bridges, water supply, wastewater treatment, storm water collection, and solid waste disposal. LTIP is a grant program for roads and bridges only.

average annual sewer service charge represents about 1.0 percent of the MHI for the City of Oregon. This amount of household income spent on sewer service charges is below the Ohio average of 1.14 percent (the state annual average user charge for wastewater services as a percentage of the 2000 Ohio MHI).

Oregon’s annual average user charge, as compared with other similarly-sized communities in the area, is as follows:

Community Name	Population	MHI	Annual Sewer Rate
Oregon	20,229	\$52,260	\$513
Sylvania	18,944	\$64,021	\$251
Maumee	14,267	\$53,777	\$411
Perrysburg	20,753	\$69,341	\$799

Loan repayment revenue is expected to be covered by an increase in local user fees. Previously, the City has funded capital improvements with revenues from the City income tax, while only operation and maintenance costs have been supported by wastewater user fees. However, the City is planning to change that approach and the construction loan repayments will be covered with new capital improvement rate charges expected to increase overall wastewater fees by 25 to 30 percent over the next five years. The estimated capital improvements rate for this project, which is expected to last for the duration of the loan repayment period (i.e., 20 years), is \$4.54 per 1000 cubic feet of usage. Considering the relatively low annual average user charge for wastewater services in Oregon, this additional rate is not expected to substantially affect customer costs.

**Project Schedule**

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The WPCLF loan is anticipated to be awarded for the proposed project in October 2015. Construction of Phase 2 should begin shortly thereafter and is expected to take approximately 14 months to complete.

**Public Notification**

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Ohio EPA will issue a copy of its Limited Environmental Review (LER) decision and Finding of No Significant Impact (FNSI) for this project to interested parties, as well as posting the documents on the Division of Environmental and Financial Assistance web page <http://epa.ohio.gov/defa/ofa.aspx>. Supporting documentation for the LER decision is available for public inspection upon request at the following address:

City of Oregon  
5330 Seaman Road  
Oregon, Ohio 43616

### Planning Information

The following agencies have reviewed and commented on the facilities planning information for this project:

Ohio Environmental Protection Agency  
Ohio Department of Natural Resources  
Ohio Historic Preservation Office

No adverse comments were received from any of the above agencies/organizations.

### **Conclusion**

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The proposed project meets the qualifying criteria for a LER as follows:

- *It will have no significant adverse environmental effect*, since all of the work will be located within the confines of the wastewater treatment plant property and will have no effect on any aquatic or terrestrial habitats or other important environmental resources;
- *It does not require extensive specific impact mitigation*, since impacts will be short-term and temporary, and will be confined to typical construction impacts (noise, dust, traffic, runoff, etc.) at the WWTP site;
- *It will have no effect on high-value environmental resources*, since there are none present in the highly-disturbed project area;
- *It is cost-effective*, since upgrading existing facilities is generally less expensive than building completely new ones and since user rates will not be substantially effected;
- *It is not a controversial action*, since it has been adequately noticed to the community and, to the best of Ohio EPA's knowledge, there is no opposition to it;
- *It does not create a new, or relocate an existing, discharge to surface or ground waters*, since all of the work involves upgrades to existing infrastructure, none of which includes work on either a new or existing point source discharge;
- *It will not result in substantial increases in the volume of discharge or loading of pollutants from an existing source or from new facilities to receiving waters*, since the

ultimate goal of the project is to eliminate sanitary sewer overflows, thus resulting in a reduction of pollutants into receiving waters; and

- *It will not provide capacity to serve a population substantially greater than the existing population*, since the upgrades will not increase the average daily flows to the WWTP during dry weather.

As indicated above, the proposed project is sufficiently limited in scope and meets all applicable criteria to warrant an LER. The planning activities have identified no potentially significant adverse short-term or long-term impacts on the environment or sensitive resources, including land forms, floodplains, ground water, culturally significant sites, threatened or endangered species, wetlands, aquatic and terrestrial habitat, surface water, air quality or state and federal natural areas; nor, will it have secondary impacts (those related to new development served by improvements to a publicly-owned treatment works), such as the conversion of farmland to more intensive (i.e., residential/commercial) uses.

Completion of this project will help Oregon achieve and maintain compliance with the plant's NPDES permit by eliminating sanitary sewer overflows that would otherwise continue to pollute waterbodies in the area and continue to threaten human health and the environment.

For further information, please contact:

Rahel Babb  
Ohio Environmental Protection Agency  
Division of Environmental and Financial Assistance  
Telephone: (614) 644-3711  
E-mail: [rahel.babb@epa.state.oh.us](mailto:rahel.babb@epa.state.oh.us)

