



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

**September 21, 2015**

**FINDING OF NO SIGNIFICANT IMPACT  
TO ALL INTERESTED CITIZENS, ORGANIZATIONS,  
AND GOVERNMENT AGENCIES**

**NORTHEAST OHIO REGIONAL SEWER DISTRICT  
MARY STREET PUMP STATION UPGRADE PROJECT  
CS391430-0123**

The purpose of this notice is to seek public input and comments on Ohio EPA's preliminary decision that a Supplemental Environmental Study is not required to implement the recommendations discussed in the attached Environmental Assessment of a general plan submitted by the entity mentioned above.

**How were environmental issues considered?**

The Water Pollution Control Loan Fund program requires the inclusion of environmental factors in the decision-making process. Ohio EPA has done this by incorporating a detailed analysis of the environmental effects of the proposed alternatives in its review and approval process. Environmental information was developed as part of the general plan, as well as through the general plan review process and during site inspections. The Agency's preliminary Environmental Assessment found that the project does not require the preparation of a Supplemental Environmental Study.

**Why is a Supplemental Environmental Study not required?**

Our environmental review concluded that significant environmental impacts will not result from the action. Any adverse impacts have either been eliminated by changes in the general plan or have been reduced by the implementation of the mitigative measures discussed in the attached Assessment.

**How do I get more information?**

A map depicting the location of the project is included as part of the Environmental Assessment. The Environmental Assessment presents additional information on the project, alternatives that were considered, impacts of the action and the basis for our decision. Further information can be obtained by calling or writing the contact person listed in the back of the Environmental Assessment.

**How do I submit comments?**

Any comments supporting or disagreeing with this preliminary decision should be submitted to me at the letterhead address. We will take no action on this general plan for 30 calendar days from the date of this notice in order to receive and consider any comments.

**What happens next?**

In the absence of substantive comments during this period, our preliminary decision will become final. The entity will then be eligible to receive loan assistance from this agency.

Please bring any information that you feel should be considered to our attention. We appreciate your interest in the environmental review process.

Sincerely,

A handwritten signature in cursive script that reads "Jerry Rouch".

Jerry Rouch, Assistant Chief  
Division of Environmental & Financial Assistance

Attachment

**ENVIRONMENTAL ASSESSMENT  
For  
Northeast Ohio Regional Sewer District  
Mary Street Pump Station Upgrade  
CS391430-0123**

**Applicant: Mr. Julius Ciaccia, Executive Director  
Northeast Ohio Regional Sewer District  
3900 Euclid Avenue  
Cleveland, Ohio 44115**

## **Project Summary**

The Northeast Ohio Regional Sewer District (NEORSD) is responsible for wastewater treatment facilities and interceptor sewers in the greater Cleveland Metropolitan Area. This service area encompasses the City of Cleveland and all or portions of 61 suburban municipalities in Cuyahoga, Summit, Lake and Lorain Counties. The Mary Street Pump Station Upgrade (Mary Street) project is located in Cleveland, Ohio, and consists of an upgrade of the existing Mary Street Pump Station, along with hydraulic modifications to the influent pipe and the tributary sewer system. The project is a measure under a Consent Decree with U.S. EPA and Ohio EPA to control combined sewer overflows (CSO) impacting Lake Erie and its tributary streams. The project cost estimate is \$10,516,400. Debt for the project will be repaid from monthly service charges. The project is scheduled to begin in November, 2015 and be completed by March, 2017.

## **Existing Conditions**

The collection system tributary to the Mary Street Pump Station drains 346 acres of residential and industrial uses. It is a mostly combined drainage system, which conveys both sanitary sewage and stormwater in the same pipes to the NEORSD's Westerly Wastewater Treatment Plant (WWTP), located at 5800 West Memorial Shoreway, Cleveland. These combined sewers become filled beyond capacity during moderate-to-severe wet-weather events, leading to CSOs of untreated sewage, often through specially-designed CSO locations, directly to surface water bodies such as lakes and rivers. CSOs can be a major source of water pollution and public health risk in cities such as Cleveland. The current Mary Street Pump Station, which has a dry well/wet well arrangement, has an estimated 4.5 million gallons per day (MGD) storage capacity. The system peak flow in this location is 16 MGD, and heavy rainfall events result in an average of 24 CSO discharge events and a total of 10.4 million gallons of combined sewer releases per year to the Cuyahoga River through CSO-086. The Mary Street project is Control Measure (CM) -18 of the Consent Decree. CM-18 requires that overflows to CSO-086 be reduced to a maximum of four in a typical year of rainfall.

## **Alternatives**

Alternative 1, a "no-action alternative," is not feasible, since it would violate NEORSD's Consent Decree to control CSOs impacting Lake Erie and its tributary streams. This would result in continued threats to human health and the environment related to CSO events.

Alternative 2 involves the adjustment of weir heights at three regulator locations. When modeled, the adjustments did not change the number of overflow events for the top eight storms and did not significantly reduce overflow volumes, which would remain in exceedance of the Consent Decree requirement.

Alternative 3 involves replacing 314 linear feet (LF) of existing 30-inch pipe and 196 LF of existing 36-inch pipe with 42-inch pipe and installing orifice plates to reduce CSOs. This alternative would result in greater in-pipe storage and a reduction of the overflow volume but not a reduction in the number of CSO events, which would remain in exceedance of the Consent Decree requirement.

Alternative 4 involves the demolition of the superstructure of the existing Mary Street Pump Station and replacement/expansion of the superstructure on the existing substructure, including replacement of all mechanical, electrical and process equipment. The new pump station will be a hybrid station utilizing the existing pump station pits as a dry weather pump station and a separate submersible pump station for wet weather flow. Two parallel force mains with diameters of 14-inches and 18-inches will be constructed to convey flow from the upgraded pump station to the existing sewer system at West 7<sup>th</sup> Street and Marquardt Avenue. When modeled, this alternative reduced the overflow volume for the top eight storms but did not achieve the reduction in the frequency of CSO events required by the Consent Decree.

Alternative 5 is the same as Alternative 4 but in addition, the Number 3 influent sewer will be connected to the existing 84-inch overflow pipe and a weir installed in the overflow pipe, amounting to a storage conduit. The combined actions of this alternative will fulfill CM-18 of the Consent Decree.

### **Selected Alternative**

Alternative 5 was selected for the Mary Street Pump Station Upgrade project, and will utilize a dry weather pump station with 2 dry-pit submersible pumps, as well as a new 40-foot deep, 16-foot diameter submersible pump station housing 2 submersible pumps. Two parallel force mains, each approximately 1,350 LF, with diameters of 14-inches and 18-inches will be constructed in open trenches to convey flow from the upgraded pump station to the existing sewer system at West 7<sup>th</sup> Street and Marquardt Avenue. In order to attenuate the peak flow, a diversion structure will be constructed to connect the existing Number 3 influent sewer to the 84-inch diameter overflow pipe, thus allowing flow to be stored temporarily in the 84-inch pipe. Additionally, a weir will be installed in the overflow pipe, allowing the pipe to act as a storage conduit to the height of the weir. The Mary Street Pump Station Upgrade project, when complete, will reduce the

frequency of overflows at CSO-086, fulfilling CM-18 of the CSO Consent Decree. While other less expensive alternatives were proposed, this alternative was the only one which resulted in fulfillment of CM-18 of the Consent Decree and avoidance of further legal actions related to CSO-86.

The project is located in an urban area of Cleveland that is both residential and industrialized. It will be constructed in and near locations with extensive excavation and utilities infrastructure, including a large mid-2000s residential development that involved razing a number of buildings and redeveloping the land. The project and surrounding areas have undergone extensive grading and filling with steel industry waste and other materials up to a depth of 26'. The project area's cover is mixture of pavement, gravel drives, weeds, debris and illegally dumped waste, sidewalks, lawn grass and street trees.

### Implementation

The total estimated cost of the Mary Street project is \$10,516,400, all of which NEORSD proposes to borrow from the Ohio Water Pollution Control Loan Fund (WPCLF). The project service area qualifies for the standard WPCLF below-market interest rate on 20-year loans, which is currently 2.24 percent. The standard rate is changed monthly to reflect bond rates and may be slightly different in October, 2015, the anticipated month of loan award. Borrowing at 2.24 percent will save NEORSD approximately \$1,540,000 over the life of the loan compared to the current market rate of 3.45 percent.

The sewer service charges for NEORSD customers are driven by the total indebtedness of NEORSD (and annual operation and maintenance costs), as opposed to the specific indebtedness of any particular project. NEORSD will not increase user rates because of this project; instead, rates were increased in 2011 to cover the period of 2012-2016.

**NEORSD Sewer Service Charge Rates\***

Rates Effective	2015	2016
Cleveland	\$69.65	\$78.05
Suburbs	\$64.55	\$79.85

\*NEORSD calculates quarterly sewer charges by multiplying actual water consumption (measured in MCF, or 7,480 gallons) by the appropriate sewer rate. A base charge is then added to that.

NEORSD is anticipating a WPCLF loan in October, 2015 to fund the proposed Mary Street project. Construction is expected to commence in November, 2015 and be completed in March, 2017.

In addition to implementing the Mary Street project, NEORSD has agreed to sponsor a Water Resource Restoration Sponsor Program (WRRSP) project through the WPCLF loan for the Mary Street project. The sponsored project is the Twinsburg Bog II project, which is being implemented by Western Reserve Land Conservancy. Funds for the Twinsburg Bog II project will be made available by advancing a portion of the estimated amount of interest to be repaid by NEORSD over the life of the loan. NEORSD will receive an additional discount (up to 0.10 percent) for sponsoring this WRRSP project. Additional information for the Twinsburg Bog II protection project can be found in its environmental review document issued September 21, 2015 by Ohio EPA.

### **Environmental Impacts**

Unaffected Environmental Features: The project will have no adverse secondary (development-related) environmental impacts, including conversion of agricultural land to other uses, since it is not designed to serve growth in undeveloped areas. No state-designated scenic rivers or state-designated or federally-designated wildlife areas are present in or near the work sites. No in-water work will take place as part of this project. No wetlands are located in the project area. This project is located outside of the 100-year floodplain. The project is not located in the Lake Erie coastal zone. No sole source aquifers are present under the project, and residents obtain their drinking water from the City of Cleveland.

The project has the potential to affect the following features, but the effects will be reduced or mitigated to acceptable levels as explained in the following.

Surface Water: The majority of the Mary Street project will not have significant adverse long-term impacts on surface water resources as there will be no in-water work, and work will be performed under urban streets and street rights-of-way, in which the predominant cover is pavement, gravel, sidewalks, lawn grass. Minor, short-term impacts from the open-cut construction could occur. Excavation of the trenches and pits could be prone to erosion and deposition, necessitating the use of construction mitigation as outlined in the city's Stormwater Pollution Prevention Plan (SWPPP). Dewatering of ground water to enable below grade work may be necessary, but engineering controls are part of the specifications to minimize these effects.

Based on the above, the proposed Mary Street project will not result in significant adverse impacts to surface waters.

Terrestrial Habitat and Endangered Species: The US Fish and Wildlife Service indicates that the project is within the range of the Indiana bat (endangered) and northern long-eared bat (threatened). Trees within the areas of force main installation are small, isolated street trees in an urban residential setting. Small and mature trees within the area of the pump station are sparse and located within/adjacent to a heavily industrial corridor and Interstate-490. Tree clearing will be limited to those that are necessary for the project. Other mature trees are located outside of the work area and within the industrial corridor of the nearby Cuyahoga River and would provide habitat for displaced bats, if present. Tree removal is only permitted to occur October 1 - March 31 or in coordination with USFWS, and tree removal is limited to only those trees necessary for completion of the project (e.g., trees within the excavation location or within the path of heavy equipment, etc.). These tree clearing restrictions will further reduce any potential impacts to Indiana bats or northern long-eared bats.

While the Kirtland's warbler, piping plover and red knot (rufa) have ranges within Cuyahoga County, this project is located in/under urban streets, street rights-of-way, lawn grass, gravel drives, weeds, debris, areas of recent disturbance and fill, and illegally dumped waste. These locations would not provide the habitat necessary for these species.

Based on this information, the project will have no significant short-term or long-term adverse effect on terrestrial habitat or endangered species.

Air Quality: Cuyahoga County is designated in "non-attainment" of the national ambient air quality standards (NAAQS) for ozone and lead. Cuyahoga County meets air quality standards for the remaining four regulated air pollutants. The proposed project will result in a temporary increase of dust and fumes from construction activities. This will be mitigated using standard construction best management practices, such as dust suppressants and emissions controls on motorized equipment. With these mitigation measures, any effects on air quality will be short-term, ending when construction is complete. Therefore, no significant adverse impact to air quality will result from the project.

Dust, Noise and Odors: These effects will be unavoidable but temporary. Noise will be controlled by using equipment that does not generate excessive noise or vibration. Work will be restricted to weekdays from 7:00 AM to 6:00 PM. Work areas will be left clean enough to prevent the generation of airborne dust. As mentioned above, dust

suppressant will be used as needed. Emissions controls on motorized construction equipment will reduce diesel odors. Once the project is complete, the sewer system will operate with no noise, dust or odors.

Based on this, the project will have no short-term or long-term significant adverse effects from noise, dust and odors.

Archaeological and Historical Resources: The proposed Mary Street project will be implemented exclusively in locations that have undergone extensive grading and filling with steel industry waste and other materials to depths ranging from 10 feet to 26 feet. In the project locations the predominant cover is pavement, gravel drives, lawn grass, weeds, debris and illegally dumped waste. Excavation and installation of sewer infrastructure and other utilities, periodic maintenance and repair activities have taken place in all project locations. The area of force main installation underwent thorough demolition of earlier structures, excavation, filling and redevelopment in the mid-2000s. The location of the existing pump station includes extensive excavation related to the pump station vaults and other sewer line infrastructure. The existing pump station superstructure will be razed and rebuilt to meet the needs of the project. The current structure's windows and doors are boarded up, and the structure shows damage from encroaching and falling trees. Therefore, this structure no longer retains any historical character that it may once have had.

Based on this information, NEORSD and Ohio EPA believe that the proposed project will have no effect on unrecorded archaeological sites, or properties eligible or listed on the National Register of Historic Places.

In the event of archaeological finds during construction, contractors and subcontractors are required under Ohio Revised Code Section 149.53 to notify OHPO of any archaeological discoveries in the project area, and to cooperate with that entity (and with Ohio EPA) in archaeological and historic surveys and salvage efforts when appropriate.

Safety and Traffic: The Mary Street project locations are aligned with existing public rights-of-way and well-defined utility easements. A detailed traffic control plan will be coordinated with Ohio Department of Transportation, local municipalities and impacted property owners. The plan will then be implemented during construction to manage traffic disruptions and prevent public safety problems. It will include temporary detours

for lane closures caused by the project, and will allow for the provision of emergency access at all times. NEORSD has a good history of working closely with local officials on projects that will impact local roads.

Once construction is complete, the Mary Street project areas will be restored and returned to pre-construction conditions. Therefore, the project will have no long-term change or adverse impacts on safety and traffic.

Local Economy: The median household income of the benefitting properties is \$43,804. The annual sewer bill, based on 3,111 cubic feet of quarterly water use, is \$866.72. This represents 1.98% of the MHI, which is considered affordable.

### **Public Participation**

NEORSD has a long history of working with the general public and local public officials when proposed projects are to be located in their community. NEORSD has several publications and an internet website that serve to keep the members of their district informed of upcoming projects. NEORSD conducted public participation by advertising for bids and providing bid updates on their website, and by advertising for bids in the Cleveland Plain Dealer. A public notice announcing the future availability of this Environmental Assessment will be posted on NEORSD's and Ohio EPA – Division of Environmental and Financial Assistance websites. The public notice for the Environmental Assessment will be open for a 30-day public comment period. Thus, there have been adequate opportunities for information dissemination and public participation.

The following agencies reviewed this project's planning information:

Ohio Environmental Protection Agency  
Ohio Department of Natural Resources  
U.S. Fish and Wildlife Service  
Ohio History Connection

## Conclusions

Based on the planning documentation, associated correspondence, public participation and the comments from interested agencies, the proposed project as designed will have no adverse long-term effect on farmland, coastal zones, surface water, ground water, floodplains, wetlands, aquatic or terrestrial habitat, endangered species, state or federal wildlife areas, state-designated scenic or recreational rivers, cultural properties, air quality or the local economy. It will have no long-term adverse effects with respect to noise, dust and odors. It will have long-term water quality benefits that will be associated with the prevention of a public and environmental health threat related to the exposure to untreated sewage via combined sewer overflows.

For further information, please contact:

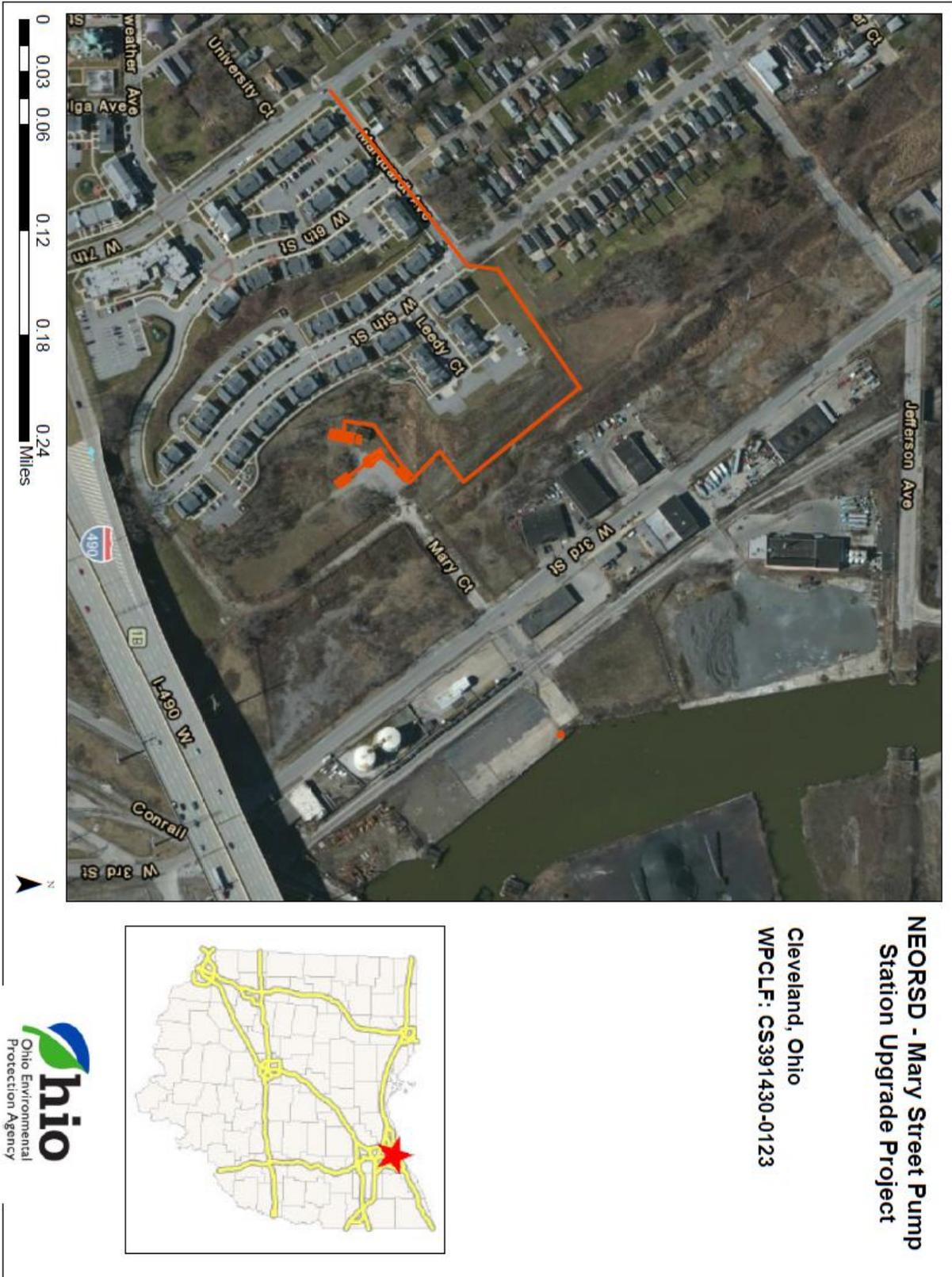
R. Eric Schultz  
Division of Environmental & Financial Assistance  
Ohio Environmental Protection Agency  
P.O. Box 1049  
Columbus, Ohio 43216-1049

Phone: (614) 644-3713

E-mail: [eric.schultz@epa.ohio.gov](mailto:eric.schultz@epa.ohio.gov)



Figure 1: Project Location



**Figure 2: Project Location**