



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

September 8, 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 Miamisburg, Montgomery County, Ohio
Miamisburg East Side Pump Station/Equalization Tank Improvements Project and
Riverview Sanitary Sewer Improvements Project
Loan # CS390593-0025 and CS390593-0031

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

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 actions 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 actions do not require the preparation of an EA or an SS.

Our environmental review concluded that because the proposed projects are limited in scope and meet all applicable criteria, an LER is warranted. Specifically, the proposed projects constitute actions in a sewerage community which are for minor upgrading and/or minor expansion of existing treatment works including, but not limited to, infiltration and inflow correction, functional replacement of existing mechanical equipment or structures, and construction of new ancillary facilities adjacent or appurtenant to existing facilities. Within the City of Miamisburg's wastewater collection system, the city proposes to first replace the existing eastside pump station with a new one in the same general location, and to construct a new buried 1.3 million gallon equalization tank adjacent to the new pump station. Second, the city proposes to replace the sanitary sewers and water mains under Riverview Avenue. As such the City of Miamisburg's proposed projects constitute activities meeting these criteria.

Furthermore, the proposed projects:

- are cost-effective;
- will have no effect on high value environmental resources;

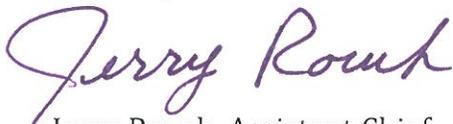
- have no potential for associated significant adverse environmental impacts;
- do not require extensive impact mitigation unique to the assistance proposal;
- are not the subject of significant public interest or controversial;
- will not create a new, or relocate an existing, discharge to surface or ground waters, or cause pollution of 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.

Maps depicting the location of the proposed projects are included as part of the LER. The LER presents additional information on the proposed projects, their costs, and the basis for our decision. Further information can be obtained by calling or writing the contact person named at the end of the LER.

The LER was completed for the proposed projects as they 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 (FNSI) now can be issued for the proposed projects.

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

Sincerely,



Jerry Rouch, Assistant Chief
Division of Environmental and Financial Assistance

JR/KH

Attachment

LIMITED ENVIRONMENTAL REVIEW (LER)

Date: September 8, 2015

A. Project Identification

Name: City of Miamisburg
East Side Pump Station and Equalization Tank Improvements Project
Riverview Sanitary Sewer Improvements Project

Address: Mr. Steve Morrison, Project Manager
City of Miamisburg
600 North Main Street
Miamisburg, Ohio 45342

Loan Nos.: CS390593-0025, CS390593-0031

B. Existing Need

The City of Miamisburg owns and operates a wastewater collection and treatment system subject to sanitary sewer overflows (SSOs) and excessive infiltration/inflow (I/I).¹ As part of a multi-project effort, the city is proposing to eliminate SSOs by completing improvements within its collection system, and at its wastewater pump stations and wastewater treatment plant (WWTP). These two projects focus on the improvements needed at the East Side Pump Station and in the Riverview Avenue sanitary sewer to address the city's responsibilities under the Clean Water Act. Figures 1 and 2 below show the locations of the proposed projects and existing facilities.

According to city officials, the purpose of the East Side Pump Station and equalization tank improvements projects is to rehabilitate aging wastewater infrastructure and provide enough additional storage capacity to reduce SSOs to meet regulatory requirements. Similarly, the purpose of the Riverview Avenue project is to rehabilitate aging water and wastewater infrastructure and reduce I/I in the sewer system. During project design, the city determined that there is inadequate isolation distance between the existing water main under Riverview Avenue and the existing sanitary sewer. In response to this new information, Ohio EPA determined that water main replacement in this project area is eligible for WPCLF funding. Normally it is not.

¹ Infiltration/inflow is defined as extraneous, clear water that enters a sanitary sewer system through surface or subsurface locations. Inflow may include clear water entering the system through manhole covers, roof or foundation drains, direct storm sewer connections, etc. Infiltration usually occurs when clear water enters the system below ground through cracked or broken pipes and manholes, poorly sealed or misaligned pipe joints, damaged or poorly connected sewer laterals, etc.



Figure 1, City of Miamisburg's East Side Pump Station Project Area (see blue squares)



Figure 2, City of Miamisburg, Riverview Avenue Improvements

Due to the excessive cost of relocating sewer lines if the pump station site were to be changed, the East Side Pump Station location needs to remain the same. During project planning, the costs of wet weather peak flow treatment and selective I/I removal efforts were also considered and compared to the costs of wet weather peak flow storage through an equalization tank. In addition to this project, the city is also proceeding with improvements to the WWTP and removal of collection system I/I in specific areas on the basis of the alternatives reviewed during planning and selected for implementation as part of a combined wet weather flow control strategy. Similarly, due to the excessive cost of relocating water main or sewer lines, no options other than the proposed actions to rehabilitate and replace the existing wastewater and water infrastructure under Riverview Avenue were considered. No action alternatives simply would not address the city's underlying needs and the SSO and excessive I/I problems would continue.

The city expects to make these pump station, equalization tank, sanitary sewer, and water main improvements with Water Pollution Control Loan Fund (WPCLF) financial assistance from Ohio EPA over the next twelve to eighteen months. The city's main objective is to better serve the facilities planning area shown in Figure 3 below. Figure 3 below shows the location of Miamisburg in relation to the facilities planning areas established in Montgomery County.

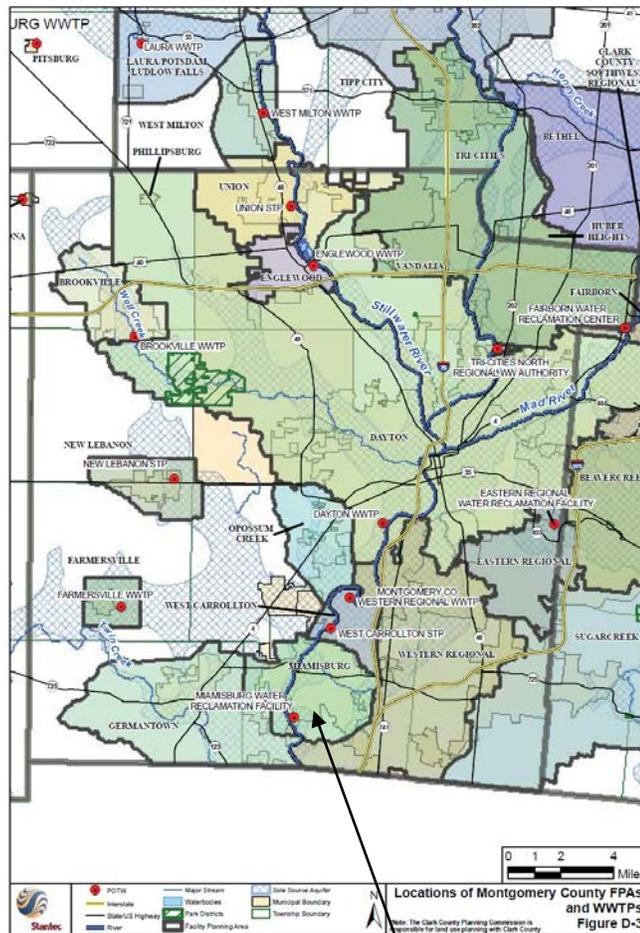


Figure 3, City of Miamisburg's Facilities Planning Area

C. Projects Descriptions

After determining that a no-action alternative would not address the problems with its wastewater collection system or at its East Side Pump Station, the city decided that it needs to fully replace the existing 12.5 million gallons per day (mgd) East Side Pump Station and to construct an adjacent, underground equalization tank, as shown in Figure 1. As part of this project, the East Side Pump Station will be built to handle 15 mgd of wastewater and the adjacent concrete equalization tank will be able to store 1.3 million gallons (mg) of flow until capacity is available in the pump station and two force mains between the East Side Pump Station and the city's WWTP. As noted earlier, the primary reason for this project is to help address SSOs at both the existing pump station and in the collection system (e.g., at Linden and Riverview, Hillview, and Second and Lock) feeding into it. Other improvements to these facilities include connecting the new facilities to the existing force mains between the East Side Pump Station and the city's WWTP, as well as providing the necessary gravity and pressure piping to convey the wastewater to and from the proposed equalization tank. Electrical service improvements, an emergency generator, new heating-ventilation-and air conditioning systems, SCADA (Supervisory Control And Data Acquisition) and other instrumentation systems, site grading, and demolition of no longer needed equipment (primarily the existing pump station) are also included in this proposed project.

For the city's Riverview Avenue water main and sanitary sewer improvements project, there are two basic components. First, the wastewater improvements include about 5,000 lineal feet (lf) of new 8- and 12-inch diameter sanitary sewers to replace some of the existing sanitary lines to address a modeled capacity limitation; about 1,200 lf of cured-in-place lining of existing 24- through 33-inch diameter sanitary sewers to restore the capacity of the rest to a near-original level; new manholes; and the lining of existing manholes. Second, the water main work needed to address the inadequate isolation distance between the existing water mains and sanitary sewers (less than 10 feet apart horizontally) encompasses about 5,900 feet of replacement water lines. Please see Figure 2 for more details.

According to the city, these improvements to its water mains and wastewater facilities, in conjunction with future I/I reduction in the collection system and a WWTP project, are meant to handle the city's existing and expected 20-year wastewater needs in the entire facilities planning area shown in Figure 3. All of the proposed improvements that are the subject of this document will be made within prior disturbed areas where the main vegetation is grass, or a few trees within Westover Park near Moore Avenue. By replacing the existing East Side Pump Station and the Riverview Avenue water lines and sanitary sewers with the proposed improvements, Miamisburg expects to have a more reliable means of conveying wastewater to its WWTP. This in turn is expected to reduce SSOs in the collection system and at the East Side Pump Station. Restoring the project areas to their original (or better) condition is an additional component of each proposed project.

The total estimated cost of the East Side Pump Station improvement project is \$14 million, of which approximately \$12 million is the engineer's estimate for construction. The remainder is for planning, design, and engineering services costs. For the Riverview Avenue improvements, the comparable construction and total project costs are \$3 to \$3.6 million. A standard interest rate WPCLF loan (currently 2.24%) will cover the design and construction

costs of the entire projects. This interest rate will be available for loans awarded through September 30, 2015.

D. Limited Environmental Review (LER) Criteria

Because the proposed projects meet certain minimum conditions, and will not individually, cumulatively over time, or in conjunction with other federal, state, or private actions have a significant adverse effect on the quality of the human environment, a LER is warranted. More specifically, these conditions cover actions in sewer communities that are for minor upgrading and/or minor expansion of existing wastewater treatment works.

In the first specific case, the proposed action involves demolishing the existing East Side Pump Station and replacing it with a new pump station, equalization tank, and related appurtenances west of the current facility. As all of the proposed improvements will be limited to previously-disturbed locations, the proposed eighteen month long construction period for this project in Miamisburg is expected to result in no short- or long-term adverse environmental impacts. In the second instance, the proposal involves replacing sanitary sewer and water lines installed before 1965 with new infrastructure. Here too, the locations are all prior disturbed.

The proposed projects meet the following, specific criteria for a LER:

- 1. The proposed projects have no potential for associated significant adverse environmental impacts and will have no effect on high value environmental resources.** Given the proposed projects' limited scope, placement within a previously-disturbed location within an urbanized area, and the absence of any notable above-ground natural features within the immediate project area shown in Figure 1 and Figure 2, the proposed projects will not result in any adverse environmental impacts. This conclusion is validated by the reviews completed by Ohio EPA and federal, state, and other governmental agencies. The known underground features and the city's approach to addressing them are discussed in detail below.

Although the Great Miami River, its associated buried valley aquifer system, and floodplain include the immediate project areas, the city's detail plans and specifications for the two projects include the measures needed to protect these three resources from construction-related impacts, such as accidental releases of fuels and other chemicals. In particular, Miamisburg's Wellfield Protection Overlay District Ordinance will be mentioned at meetings with potential contractors, and thus is expected to (1) alert them to the environmental sensitivity of the wellfield located above a federally-designated sole source aquifer, and (2) enable them to take proactive steps (in the form of contingency plans) to prevent or control any chemical, oil, or wastewater spills during the projects. In addition, Ohio EPA consulted with Ohio Department of Natural Resources (ODNR), Floodplain Management Unit, and the city conferred with local floodplain personnel, to assure that all proper permits are acquired and terms followed during construction activities. By installing most of the proposed projects below grade, no encroachment into the floodplain is anticipated. Together, the city's proposed

assurances should address these key concerns during the relevant 12-18 month construction periods.

As a result, no significant adverse environmental effects will occur because either significant natural features are generally absent from the project areas, or specific provisions to minimize construction-related impacts to the area's aquifer and floodplain are included in the two projects' contract documents.

2. **The proposed projects will not require extensive impact mitigation unique to the assistance proposals.** The proposed work to complete these two projects is straight-forward and does not require any extensive mitigation of environmental impacts, as all of the improvements will be made within previously-disturbed areas (e.g., the existing pump station site shown in Figure 1 and the project area shown in Figure 2). In that regard, moderate amounts of earth-moving activity is associated with these improvements, so that only routine environmental impact mitigation in the form of standard soil erosion and sedimentation controls, spill control, dust control, vehicle emission and traffic controls, and adherence to prohibited construction activities is necessary. To address potential Ohio EPA concerns about disposal of excess material excavated during construction activities, only prior-approved spoil disposal sites may be used. This is to avoid any significant adverse off-site impacts such as from any placement of excavated material or other fill in floodplains, wetlands, or other sensitive areas not previously approved by Ohio EPA for that purpose. Readers should note that the proposed East Side Pump Station and equalization tank project will not generate any excess excavated fill, and that the proposed project site will be receiving some excess fill from Riverview (as much as 15,200 cubic yards) and Westover projects to level it.
3. **The proposed projects are cost-effective and not the subject of significant public interest.** In comparison to (1) a no-action option that would leave unaddressed the current concerns within the city's collection system and at the pump station and (2) an I/I removal alternative, the proposed East Side Pump Station and equalization tank improvements are more cost-effective. The city also indicated that relocating the pump station would be more costly than the proposed project, due to the costs of relocating existing sanitary sewers. Similar reasoning was the basis for the conclusion reached for the Riverview Avenue sanitary sewer project.

Moreover, the proposed improvements constituting these two projects are non-controversial because they will not adversely impact the environment or the rates paid for wastewater in the facilities planning area. Please see the Project Implementation (Section E) and the Estimated Project Costs and Proposed Project Schedule (Section F) parts of this document following this section.

Information on the city's public participation activities is presented below.

4. **The proposed projects will not create a new, or relocate an existing, discharge to surface or ground waters, or cause pollution of surface or ground waters. They will also 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. The proposed projects will not result in either new, relocated, or additional discharges of wastewater to either surface or ground water on a permanent basis. Part of the reason for this finding is that the proposed projects will improve the operation of the city's WWTP and enable it to better comply with its permit to discharge treated wastewater to the Great Miami River. No expansion of this WWTP should be necessary to accommodate the city's proposed projects. Thus, no change in the city's existing National Pollutant Discharge Elimination System (NPDES) permit covering its WWTP is expected in response to these projects. Overall, the city's projects will not require an enlarged WWTP, a relocated wastewater outfall, or a discharge of additional pollutants to local surface water resources through population growth.

Similarly, the fact that these projects involve making improvements designed to meet current engineering standards and the city's 20-year needs also supports our conclusion that these projects do not involve creation of a new, or support expansion of an existing, source of water withdrawn from either surface or ground waters.

5. **The proposed projects 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.** As noted above, the proposed improvements to Miamisburg's East Side Pump Station, appurtenances, and the Riverview Avenue water and sewer lines are not designed to facilitate future growth in or around the city, but rather to address the city's regulatory responsibilities under the Clean Water Act. On this basis, the proposed projects will not result in any increase in the volume of discharge or the loading of pollutants from the Miamisburg WWTP, or permitted to be discharged under the city's NPDES permit.

The proposed projects will not provide capacity to serve a population substantially greater than the existing population. The proposed East Side Pump Station and equalization tank improvements project and Riverview Avenue project will not expand the rated capacity of the city's overall wastewater treatment system. This conclusion was reached because the proposed projects consists primarily of replacing the existing pump station and Riverview sanitary sewer and water infrastructure with adequately-sized facilities to serve existing and previously-planned, future city needs within a largely fully-developed community. In addition, the city's WWTP located along the Great Miami River has a design capacity limited to 4.0 mgd. As such, the proposed projects will provide capacity to address SSOs and excessive I/I, serve the existing and projected (20-year) population, and not spur unexpected future growth. On this basis, the proposed projects and the population they are expected to support should have no effect on environmental attributes that are typically affected by growing populations. For example, they will not adversely affect the current full attainment status of Montgomery County for the six priority air pollutants.

On average, the city's wastewater customers typically use about 2.29 mgd. Any future growth and increase in water use (by 2032) are expected to originate in the

western part of the facilities planning area shown in Figure 3. Over that time period, demand is expected to average 2.94 mgd. Peak flows are not expected to exceed the 15 mgd figure used to design the proposed East Side Pump Station project and the city's other pending wastewater improvements, including those proposed for Riverview Avenue.

E. Project Implementation

To implement the proposed projects described above, the City of Miamisburg intends to finance the improvements to its facilities planning area through low-interest loans from Ohio EPA's WPCLF. Currently, the WPCLF standard interest rate is 2.24%. Prior to loan award, this fixed interest rate is adjusted monthly to reflect changing market conditions.

Given the water and wastewater rate increases previously enacted by Miamisburg city council in June 2014 for 2015-2019, the city expects that the resulting revenues and the use of existing surplus cash reserves will cover the costs of its wastewater operating and improvement/replacement accounts. Accordingly, under this configuration, no other rate increases are needed to pay for these individual projects, but the previously scheduled ones will be necessary to pay for the combined, currently planned water and wastewater infrastructure projects across the city. In 2019, the city estimates that its quarterly combined water/wastewater fees will need to increase to \$312 per 2200 cubic feet of water usage. Assuming the project funding presented above, Ohio EPA expects that the city will save about \$2.7 million when compared to a market-rate loan of 3.57% on the two total project costs of \$14 million and \$3.6 million respectively. By proposing to fund their projects in this way, Ohio EPA anticipates that the City of Miamisburg should be able to generate enough revenue under its current and proposed water rate structure to continue to own, operate, and maintain its wastewater collection and treatment systems well into the future.

F. Estimated Project Costs and Proposed Project Schedule

Currently, the total estimated project cost of the proposed pump station and equalization tank improvements described above is \$14 million, and the total estimated cost of the Riverview Avenue project is \$3.6 million. To pay for these improvements and related planning, design, and inspection costs, Miamisburg expects to utilize 20-year, standard interest-rate loans from Ohio EPA's WPCLF program (currently available at 2.24%).

Under the wastewater rates effective in January 2015, a typical, in-city residential customer using on average 2200 cubic feet per quarter currently pays a fee of \$118 per quarter, or about \$472 a year. When expressed as a percentage of the city's latest median household income (MHI) figure of \$52,689, these annual fees are about 0.89% of the city's 2008-2012 MHI, and thus are considered to be generally affordable for an average residential water customer of Miamisburg. As noted earlier, water and wastewater rates are expected to continue to increase following the city's previously adopted schedule through at least 2019, so as to cover the costs of planned capital improvements. Given the financial information presented above, no significant adverse economic impacts on the local residential users of Miamisburg's wellfield are anticipated, as sanitary sewer rates in 2019 will still only be about 1.28% of the city's current MHI.

Under the city's proposed project schedule, WPCLF funds are expected to be awarded in September - October 2015, so that construction can commence soon thereafter. The city estimates that construction will be completed between January and June 2017.

G. Public Participation and Notice

With assistance from Ohio EPA, the city prepared and distributed a fact sheet on the East Side Pump Station project to 36 project area residents, and held a public meeting covering the Riverview Avenue project and attended by nine people on August 19, 2015. According to Miamisburg's project manager, the project fact sheet was also posted on the city's website and on two bulletin boards at the Civic Center and Water Treatment Plant during the 21-day public comment period between August 3 and August 24, 2015. City council was also given updates on each project during the last month.

The city's project manager received no responses to the East Side Pump Station project fact sheet during the public comment period. In addition, the nine people at the public meeting were given an opportunity to have their questions addressed. On the basis of the previous general public presentations and information meetings held during 2013 and again in August 2015 for the Riverview project, and the limited scope of both projects covered by this document, Ohio EPA has determined that no additional public review and comment on the proposed projects is necessary. All potentially-interested parties have been given adequate opportunity to review and comment on these projects and their costs.

Additional information that supports this decision to issue an LER is available for public inspection upon request at the City of Miamisburg's office located at 600 North Main Street, Miamisburg, Ohio 45342. Mr. Steve Morrison, Project Manager, is the city's contact, and can be reached by phone at 937-847-6492 (or via e-mail at steve.morrison@cityofmiamisburg.org) to answer questions related to this and other planned water and wastewater projects.

H. Interagency Coordination

The proposed projects have been reviewed by the following agencies for technical input, or for conformance with legislation under their jurisdiction, and their findings support a LER:

Ohio Department of Natural Resources	Ohio EPA
Ohio Historic Preservation Office	United States (U.S.) Fish and Wildlife Service
U.S. EPA	

I. Conclusion

The proposed projects are sufficiently limited in scope and meet all applicable criteria to warrant a LER. The planning activities for the proposed projects identified no potentially-significant, direct, indirect, or cumulative adverse impacts. The proposed projects are expected to have no short- or long-term adverse impacts on the quality of the human environment or on sensitive resources such as air quality, floodplains, wetlands, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant

sites, or threatened or endangered species. The City of Miamisburg's proposed East Side Pump Station and equalization tank improvements project, and the Riverview sanitary sewer project will enable the city to address its regulatory responsibilities under the Clean Water Act -- especially those related to the SSOs at the intersection of Linden and Riverview and at the East Side Pump Station, excessive I/I, and existing pump station conditions that prompted the city to initiate these proposed projects. Public health risks associated with potential exposure to untreated sewage in the project areas will also be reduced.

J. For further information, please contact:

Kevin Hinkle
Ohio EPA, Division of Environmental and Financial Assistance
Office of Financial Assistance, Technical Review Section, Environmental Planning Unit
P.O. Box 1049
Columbus, Ohio 43216-1049
(614) 644-3712
e-mail: kevin.hinkle@epa.ohio.gov