



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

August 20, 2015

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

VILLAGE OF MIFFLIN WASTEWATER IMPROVEMENTS PROJECT
ASHLAND COUNTY
WPCLF# CS390602-0002

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 the Village of Mifflin – Wastewater Improvements Project.

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 facilities plan, as well as through the facilities 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 facilities plan or have been reduced by the implementation of the mitigative measures discussed in the attached Environmental 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 proposed 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 not take any action on this facilities 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 purple ink that reads "Jerry Rouch". The signature is written in a cursive, flowing style.

Jerry Rouch, Assistant Chief
Division of Environmental & Financial Assistance

Attachment

Environmental Assessment

A. Project Identification

Name: Village of Mifflin
Wastewater Improvements

Address: The Honorable Fred Craig, Mayor
Village of Mifflin
36 East Maine Street
Mifflin, Ohio 44805

WPCLF No: CS390602-0002

B. Proposed Project

1. Summary

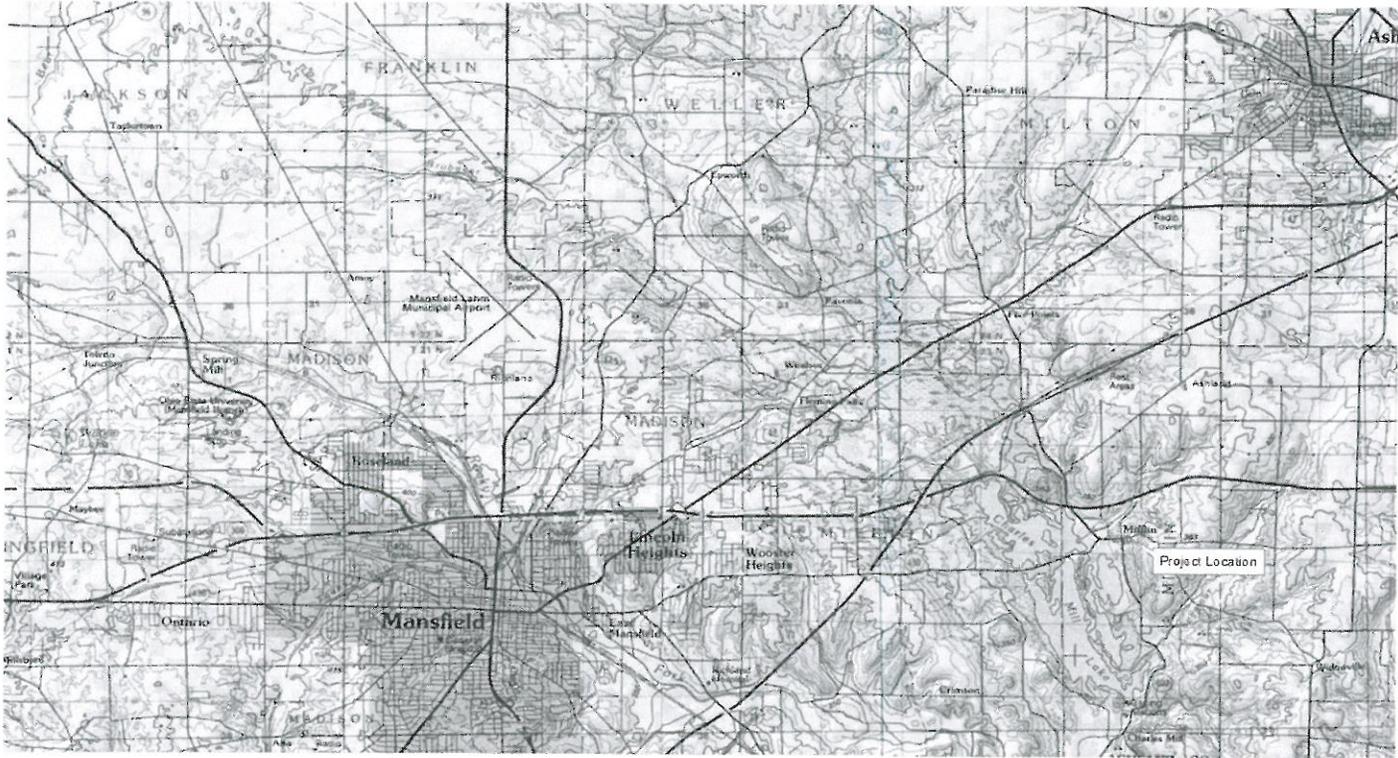
The Village of Mifflin has requested funding from Ohio EPA's Water Pollution Control Loan Fund (WPCLF) for a project to construct a new wastewater treatment plant and wastewater collection system. This Environmental Assessment (EA) is prepared, in accordance with the WPCLF procedures, to evaluate the potential environmental impacts of the proposed project.

The Mifflin – Wastewater Improvements project is located in Mifflin within Mifflin Township in Ashland County. The project involves the construction of a new wastewater treatment plant and an associated collection system to serve the Village. The Village is currently an unsewered community with failing septic systems which result in a health risk to the citizens and water quality concerns in nearby Charles Mill Lake. The new wastewater treatment plant will be constructed on an abandoned road easement that belongs to the Village on the eastern edge of town. Based on Ohio EPA's review, which is summarized in this Environmental Assessment, this project will not result in any significant adverse environmental impacts provided the project is implemented according to plan.

2. Project History and Existing Conditions

The Village of Mifflin is an incorporated statutory village with a population of 137 persons residing in 59 homes according to 2010 census data. The Village is

bisected by State Route 603 and 430 approximately 8.3 miles east of Mansfield, Ohio, adjacent to Charles Mill Lake (see figure below).

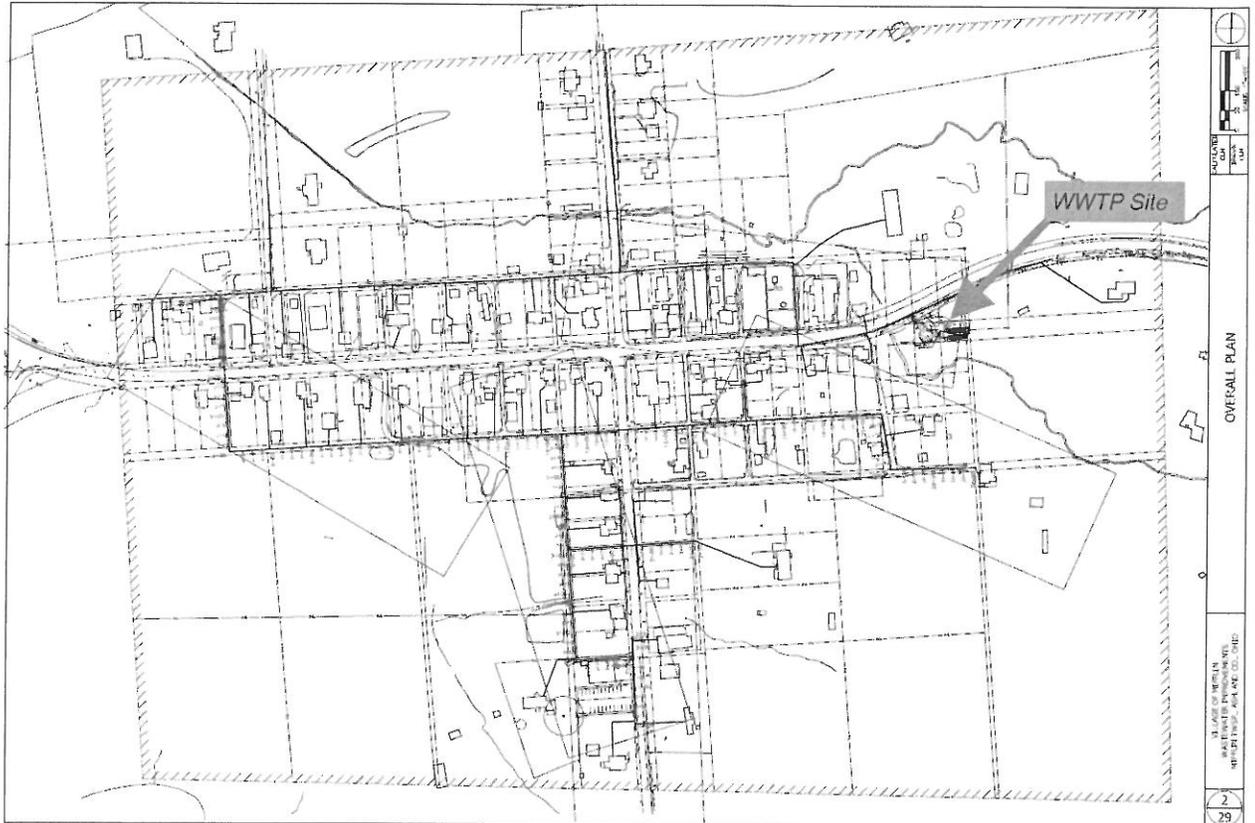


Mifflin is a long-standing community, having been populated in the 1800's. The village does not have centralized wastewater or water services despite being a relatively compact community. Many of the residences are located on small lots with wells and home sewage treatment systems. Additionally, many of the home sewage treatment systems are aging and in disrepair this creates unsanitary conditions within the village, endangering public health and the private water well systems. Recent sampling has shown high levels of bacteria in the village waterways and within the surrounding watershed. Ashland County Health Department, as well as the Mayor and Village Council, are all on record supporting the installation of a centralized wastewater collection and treatment system to replace the home sewage treatment systems currently in use.



Aerial View-Village of Mifflin

The goal of this project is to construct a new wastewater treatment plant and collection system for the Village of Mifflin. The plant is proposed to be constructed on property owned by the village on the edge of town, providing cost savings due to the location and availability of the property. The Village is also able to locate the collection system all within existing road and alley easements, which is also helping to keep costs to a minimum and reduce the potential for environmental issues associated with construction projects. This will achieve the goal of providing safe and affordable wastewater service for the citizens of Mifflin.



Plan View of Village of Mifflin with proposed WWTP location

3. Alternatives Analysis

Various possibilities for the collection system were considered as well as different types of treatment plants and optimization of the existing facilities. Collection systems considered included gravity collection, septic tank effluent pump (STEP) systems, and septic tank effluent gravity (STEG) systems. Treatment systems evaluated included the extended aeration activated sludge plant, the subsurface sequencing batch reactor (SBR) plant; Aero-Mod activated sludge plant, and regionalization with an existing plant.

The desire of the village to keep operation and maintenance costs to a minimum and to have a conventional and reliable system led to the selection of a standard gravity collection system. A gravity collection system involves the construction of sewer lines in the street right-of-way and lateral connections from each home to the collector sewer which will serve each residence. The STEP or STEG systems involve septic tanks where settling occurs prior to connection to the central sewers. Each of these systems has higher costs of operation and typically requires more maintenance.

The primary factors in the selection of the treatment plant type were ease of use, cost, and size of the plant (since the Village preferred to locate the plant on property it currently controls). All of the systems being evaluated are able to adequately treat the wastewater generated from a village the size of Mifflin if operated correctly. The alternative analysis led to the selection of the SBR plant as the most cost effective solution. The Aero-Mod activated sludge and the extended aeration activated sludge plant are estimated to have higher operation and maintenance costs than the SBR. Regionalization with the nearest treatment plant in Hayesville, which is 5.4 miles away, had the highest costs of the alternatives considered. Additionally, Hayesville has capacity issues and would not currently be able to accept additional waste.

A “no-action” alternative was considered, but would not meet the stated project purpose, since many of the home sewage treatment systems aren’t performing properly and the unsanitary conditions would not be corrected. Additionally, optimization of the existed home system treatment systems is not a viable option since most systems cannot meet existing Ohio Department of Health requirements due to lack of space and poor soils. The decision to install a centralized treatment plant and collection system is a cost-effective solution to the pollution and health hazard issues that exist in the Village of Mifflin. No-action would mean allowing a worsening public health hazard to exist in the Village of Mifflin.

4. Project Description

The proposed project includes a gravity collection system for the Village that flows to a single pump station which conveys the flow to the treatment plant. The proposed treatment plant is an underground sequencing batch reactor (SBR) design, proprietarily known as SABRE.

The collection system will consist of 7,349 feet of 8" PVC gravity sewers, 40 precast concrete manholes, and a 15 GPM pump station with a 2,110 foot long 4" force main. All of the gravity sewers in the Village will flow to this pump station before the flow is sent to the treatment plant. The project will also include the installation of 4" and 6" PVC sewer laterals to 57 properties and 4 grinder pumps with 2" effluent lines for structures that cannot be easily served by a gravity lateral. The laterals and grinder pumps will be owned, operated, and maintained by the Village as part of the collection system.

The treatment plant will be a SABRE underground SBR plant sized for a 30,240 GPD average daily flow (ADF). The plant will consist of two underground tanks and a small building containing tertiary filtration and a UV disinfection system. The flow will discharge from the force main into a manhole located at the plant. It will then flow via gravity to the primary settling tank which will also act as an equalization

basin while the second tank is treating each batch of wastewater. The primary tank has a baffle to separate the sludge and floatables from the discharge pump to reduce the amount of solids that flow into the treatment tank. The second tank contains the SBR unit which will treat the influent in batches before pumping it to the building for UV disinfection and tertiary filtration. The pumps used to empty the treatment tank are floating decanters that remove the treated water but stay above the settled sludge. The waste activated sludge from the SBR tank will be returned by a submersible pump to the primary tank which will also act as an anaerobic digester. The primary tank is estimated to have nine months of sludge storage capacity. When the storage capacity is reached, the tank will be pumped out by a contracted sludge hauler for disposal.

The effluent will be discharged to an unnamed tributary of Ruffner Run which is an undesignated tributary to Charles Mill Lake within the Mohican River watershed.

5. Implementation

Construction of the Mifflin – Wastewater Improvements project is scheduled as follows:

WPCLF Loan Award -----September 2015
Start Construction -----October 2015
Operation of New System -----September 2016

The total estimated project cost for this project is \$2,719,454.00, all of which the village proposes to borrow the WPCLF. This project qualifies to receive the loan as a grant in the form of principal forgiveness from the WPCLF administered by Ohio EPA's Division of Environmental and Financial Assistance for an amount up to \$2,721,969.00. The construction costs for this project will be entirely funded by the WPCLF, saving Mifflin residents over \$3.8 million compared to market-rate financing.

C. Environmental Impact of the Proposed Project

The WPCLF program requires that a comprehensive environmental review be performed prior to the award of financial assistance. This review examined both known and anticipated environmental impacts associated with completion of the proposed project, including secondary (indirect) development impacts. Since Mifflin has maintained a fairly consistent population for many decades and is constrained by the Charles Mill Lake area, significant growth and associated secondary impacts are not expected. Modest growth of 9.3% was accounted for in population projections when determining the appropriate capacity for the plant.

Construction of the proposed WWTP will occur in a previously-disturbed

abandoned road right-of-way, and the construction of sewer lines will occur within the footprint of the existing road and alley rights-of-way. The areas that will be disturbed do not contain environmentally-sensitive resources, and the construction-related impacts are such that standard construction best management practices will generally be adequate to prevent adverse environmental impacts. Since all mature trees will be cleared during the hibernation period for endangered bats in Ohio (October 1st-March 31st), the overall potential for adverse environmental impacts has been greatly reduced and project installation should not result in any significant adverse land form changes.

The results of our environmental review of the project are summarized below.

1. Surface Water Resources

This project is located within the watershed of Charles Mill Lake, which is within the Mohican River watershed. The Mohican River is designated as warmwater habitat for protection of aquatic life within this portion (Black Fork of the Mohican) of its watershed.

Construction of the proposed project is not expected to have an adverse impact on surface waters. No direct impacts to streams or wetlands are proposed for the project, since most of the project area does not include any waters of the state within the project boundaries, including Wild and Scenic Rivers and coastal zones. The project does involve two stream crossings, one on Ruffner Run and one the unnamed tributary to Ruffner Run. Each of these will occur within existing utility/road easements and will not result in any stream disturbance. Storm water, run-off and sedimentation will be managed through use of construction best management practices, which are detailed in the sediment control plan. Also of note will be the installation of the effluent discharge station for treated water from the new plant to the unnamed tributary to Ruffner Run. This discharge will require a NPDES (National Permit Discharge Elimination System) permit, which in turn requires the effluent from the plant to meet national and state standards and be monitored regularly. The potential plant construction and required permit is currently undergoing an anti-degradation review by Ohio EPA's Division of Surface Water. The discharge from the plant will be a big improvement in water quality over the existing home sewage treatment systems currently in use.

Based on the construction methods for the collection lines to avoid impacts to the Ruffner Run and its tributary, as well as the lack of water bodies elsewhere within the project area, no significant adverse impacts are expected to occur to surface water resources including wetlands, floodplains, scenic rivers, or coastal

zones.

2. Habitat and Wildlife

The project site is contained within the existing road rights-of-way and an approximately 0.2 acre abandoned right-of-way parcel. It does not contain high quality aquatic or terrestrial habitat for native flora or fauna. Although the plant site and a few other project areas will require some tree removal, most of the project area will not and is maintained as roadways or mowed lawn adjacent to the existing roads. Habitat bordering the project area for the new plant does contain trees; however the surrounding habitat will be avoided. The tree removal that is necessary for the project will be completed between October 1st and March 31st to avoid any potential impacts to any endangered bat species that may be present during the summer months in the project area.

As part of the environmental review of the Mifflin - Wastewater Improvements project, information from the Ohio Department of Natural Resources (ODNR) and the U. S. Fish and Wildlife Service (USFWS) was reviewed with regard to threatened and endangered species that may be present near the project area. Ashland County is within the range of the following federally-listed threatened and endangered species:

Species	Status	Habitat
Indiana bat (<i>Myotis sodalis</i>)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well-developed riparian woods; upland forests
Northern long-eared bat (<i>Myotis septentrionalis</i>)	Threatened	Hibernates in caves and mines – swarming in surrounding wooded areas in autumn. During late spring and summer, roosts and forages in upland forests.

Due to the nature and the relatively small footprint of the proposed project, no adverse impacts to any of these species are expected. In accordance with Section 7 of the Endangered Species Act, a “may affect, but not likely to adversely affect” determination has been made for this project: considering this proposed project does contain small amounts of bat habitat trees, but avoidance and minimization measures will make any potential impacts insignificant and discountable since bats will not be present or roosting during the time period the trees are permitted to be removed. Additionally, the amount of suitable habitat affected is small and other unaffected suitable habitat is abundant nearby. After consultation with the U.S. Fish and Wildlife Service and the Ohio Department of Natural Resources concerning state threatened and endangered species, Ohio

EPA was able to determine no significant impacts will occur to state or federally threatened or endangered species.

The potential for impacts to the watershed's aquatic habitat will be minimized, since the proposed sewer lines will be bored at the two stream crossings without disturbance to streambed. Given the nature of construction activity, and the fact the project has a relatively small footprint and is occurring within existing rights-of-way, the proposed project is not expected to have any significant adverse environmental impacts to terrestrial or aquatic habitat, fish and wildlife, or to any threatened or endangered species.

3. Ground Water Resources

The project area does not include any public water system wells. The use of spill protection and best management practices, as described in the detailed engineering plans, will protect ground water from any potential impacts related to this project. The citizens of Mifflin are all on private wells, which are served by a relatively shallow groundwater aquifer. Depth to water is typically less than 30 feet and recharge is typically high. This project will remove a source of pollution and concern for the residents, who often have wells and sewage treatment systems sited adjacent to each other without adequate separation distance. This project will provide citizens with better protection for their drinking water wells. Thus, ground water resources and safe drinking water will not be negatively impacted by this project.

4. Human Environment

Potential impacts to the local citizens are also considered as part of this environmental review. Safety concerns, including noise and traffic, are those of a typical construction site. While noise levels in the project area will be increased by the operation of equipment during construction, the impact of these activities will be short-term and cease once the project is complete. To reduce the short-term impacts, construction activities will only take place during daytime hours. Aesthetically, construction sites are often considered displeasing, but the new plant site will be fenced off during construction. For the collection lines surface disturbance will be staged to avoid long term accessibility issues. All roadways will be restored to their previous condition. Long-term air quality will be unaffected, since the project adds no new sources of air pollution, while short-term impacts from dust and vehicle emissions will be controlled using typical construction best management practices. A short-term increase in traffic may be noticeable in the area due to delivery of equipment and materials during construction. It is not anticipated that traffic flow will be significantly impacted.

Cultural concerns, including archeological and historical resources and farmland

protection will not be impacted by the construction of the new wastewater plant and collection lines for this project. The Village of Mifflin does contain several buildings listed as historic structures on the Ohio Historic Inventory, but these buildings will not be altered and are not within the project area. Ohio EPA was able to conclude, in coordination with the Ohio Historical Preservation Office, that this project will have no effect on eligible historic properties and it is unlikely that intact archaeological sites exist within the project area.

According to the 2007 – 2011 American Community Survey, the Village of Mifflin has an estimated population of 131 and an estimated median household income (MHI) of \$21,875. Per the 2012 Annual Residential Sewer Rates (based on 7,756 gallons, or 1,037 cubic feet per month), and as shown in the table below, projected user rates for the Village of Mifflin service area are lower than the surrounding communities and below the statewide average.

Community	Population	MHI	Annual Sewer Rate
Mifflin	131	\$21,875	\$342
Crestline	4,637	\$38,571	\$824
Hayesville	420	\$41,429	\$531
Ashland	20,320	\$38,547	\$671
Statewide Average	-	-	\$581

The above table compares rates based on a standard usage of 1,037 cubic feet per month; however, the average residential usage within any given service area is typically lower. Of note, Mifflin has enacted a flat rate for residential customers, so users are charged the same, independent of usage. The construction costs of this project are being financed with the WPCLF principal forgiveness funds, allowing the monthly user fee to go mainly towards operation and maintenance. This will result in an estimated annual bill of \$342 for the residents in Mifflin, which is 1.6% of local median household income (\$21,875). By using WPCLF financing, the Village of Mifflin has minimized the project cost and the potential adverse effect on the local economy.

D. Public Participation

The following agencies have reviewed, and were provided an opportunity to comment on, the planning information for the proposed project:

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

In addition, there have been multiple mailings to the residents and several public meetings regarding the development of a public wastewater system and the specifics of the proposed project. Many of the residents signed easements for the installation of laterals and septic tank abandonment. The general public is aware of the need for the project, and Ohio EPA is not aware of significant public opposition.

E. Reasons for a Preliminary Finding of No Significant Impact

Based upon Ohio EPA's review of the planning information and the materials presented in this Environmental Assessment, it is concluded that there will be no significant adverse impacts from the proposed project as it relates to the environmental features discussed previously. Through avoidance of sensitive areas and the use of the planned mitigative measures, such as construction best management practices, the impacts from construction should generally be short-term and insignificant.

The completion of this project will enable the Village of Mifflin to provide centralized wastewater services to the community, helping eliminate pollution generated by failing home sewage treatment systems. It will provide a public service to the residents previously not available, improving water quality within the community and protecting downstream uses in Charles Mill Lake and the Mohican River watershed.

F. Questions or Comments

For further information, contact:

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Ohio EPA, Division of Environmental & Financial Assistance
P.O. Box 1049
Columbus, Ohio 43216-1049

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E-mail: Jeffrey.Boyles@epa.ohio.gov