

September 3, 2018
Limited Environmental Review and Finding of No Significant Impact
Paine and Fassett Regulator Modifications
Lucas County
WPCLF # CS390915-0122

The attached Limited Environmental Review (LER) is for a wastewater treatment water quality improvement project in your area which the Ohio Environmental Protection Agency intends to finance through its Water Pollution Control Loan Fund (WPCLF) below-market interest rate revolving loan program. The LER describes the project, its costs, and expected environmental benefits. Making available this LER fulfills Ohio EPA's environmental review and public notice requirements for this loan program.

Ohio EPA analyzes environmental effects of proposed projects as part of its WPCLF program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. This project's relatively narrow scope and lack of environmental impacts qualifies it for the LER rather than a more comprehensive Environmental Assessment. More information can be obtained by calling or writing the person named at the end of the document.

Loan award will proceed without further environmental review or public comment unless new information shows that environmental conditions of the proposed project have changed significantly.

Sincerely,



fo
Jerry Rouch, Assistant Chief
Division of Environmental and Financial Assistance
Office of Financial Assistance

JR/LMM

attachment

**LIMITED ENVIRONMENTAL REVIEW
For
City of Toledo
Lucas County**

**Paine and Fassett Regulator Modifications
Loan Number CS390915-0122**

**Applicant: Wade Kapszukiewicz, Mayor
One Government Center
Toledo, Ohio 43604**

Project Summary

The City of Toledo (Toledo) has applied to the Ohio EPA, Division of Environmental and Financial Assistance (DEFA) for a Water Pollution Control Loan Fund (WPCLF) loan to separate combined sewers in the Paine and Fassett roads neighborhood. Toledo is operating under a 2002 federal consent decree to eliminate combined sewer overflows.

The proposed project involves modifying the regulator and return line and providing floatables control and backwater protection at the CSO outfalls.

Existing Need

Toledo is in Lucas County (see Fig.1) and has a population of 287,208. Toledo's combined sewers date back to the 1860's, carrying both stormwater and wastewater flows from their respective drainage areas

The combined sewers release excess wet-weather flows from the discharge points known as combined sewer overflows (CSOs). CSOs are partly responsible for water quality degradation in Toledo's natural waterways and pose a public health threat from exposure to raw sewage. In 2002, Toledo entered into a federal consent decree to eliminate the CSO discharges and, from 2005 to 2009, developed the Toledo Waterways Initiative (TWI) Long-Term Control Plan (LTCP) for CSO abatement.

The Paine (CSO 04) and Fassett (CSO 08) outfalls discharge typically 11 and 15 times per year, respectively, discharging approximately 15 million gallons (MG) to the Maumee River.

The LTCP requires:

- Discharge frequency of untreated overflow averaging 3 overflows/year; and
- Floatables control and backwater protection to be provided on outfalls discharging more than once per year.

Alternatives

An evaluation of alternatives to address the project area needs includes:

A "No-Action" alternative was considered. However, due to the above-described LTCP, the No-Action alternative of continuing with the current situation is not feasible because it would continue illegal CSOs and lead to fines or other enforcement.

With the LTCP requirement to reduce overflow occurrences to three or fewer per year, consultants evaluated various alternative modifications to the Paine and Fassett CSO

regulators to determine the optimal configurations of weir height, CSO pipe diameter, and underflow pipe diameter.

The evaluation concluded that the goals would be achieved through a combination of several modifications at each of the outfalls as described below.

Selected Alternative

To reduce the number of overflow events, the existing regulators will be modified to direct more flow to the Eastside Sewer Interceptor (ESI) through raising the weir elevations and increasing the pipe diameter and return sewer where needed.

The selected alternative is to raise the weir at the Paine St (CSO 04) regulator approximately 4.9 feet, add a screening and floatables chamber, and rehabilitate the 84-inch sewer downstream of the regulator to the outfall. Recommended construction at the Fassett (CSO 08) regulator includes raising the weir approximately 5.6 feet, increasing of the sewer return line to the ESI from 18 inches to 24 inches, adding a screening and floatables chamber, rehabilitating the 48-inch sewer upstream of the regulator, and replacing the existing 48-inch outfall pipe to the river, including a new backflow prevention device.

Screening and floatables control structures are required at each outfall. Excess flow will back up behind an overflow weir until the upstream depth of flow exceeds the weir crest. A baffle is situated upstream of the overflow weir with its bottom located below the weir crest. The overflow passes under a baffle to capture floating materials upstream of the baffle. Overflow then must flow up through a horizontal bar screen prior to passing over the weir crest. The bar screen will have 2-inch spacing, consistent with the CSO LTCP.

The Fassett Street site provides flexibility locating the new screening and floatables control structure. The new structure can be sited immediately downstream of the regulator (See Fig. 2).

The Paine Street site provides some complexities with siting the new screening and floatables control structure. The overflow pipe is located on an active commercial property with many railroad tracks and grain storage silos located along both sides of the pipe. A site investigation with Toledo staff and representatives from determined the best location of the new structure is immediately downstream of the CSO regulator, within the existing facility parking lot. There is sufficient space between the regulator and the first set of rail road tracks to site the structure (See Fig. 3).

In addition to the above work, the City needs to remove an abandoned level sensor, the pipe encasement and above-ground chart recorder by a manhole on Hamilton Street in the right of way and plug a 48" outfall pipe to Swan Creek prior to entering the 2020 Compliance Phase of the Consent Decree. The work will impact only brush and scrub trees. It will not impact any designated wetlands (See Fig. 4).

Figure 1. Toledo is located in Lucas County, Ohio.



Figure 2. Fassett Street – Proposed Location for the Screening and Floatables Control Structure

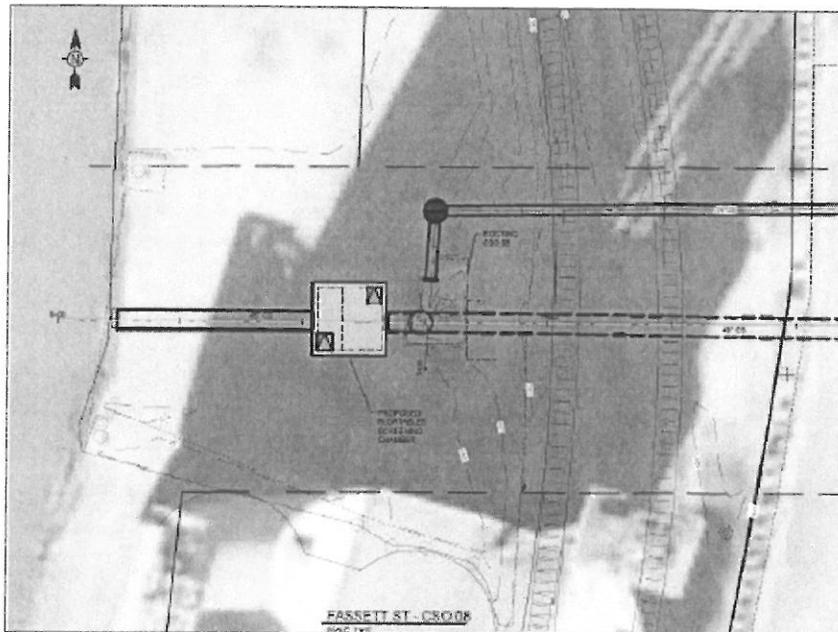


Figure 3. Paine Street – Proposed Location for the Screening and Floatables Control Structure

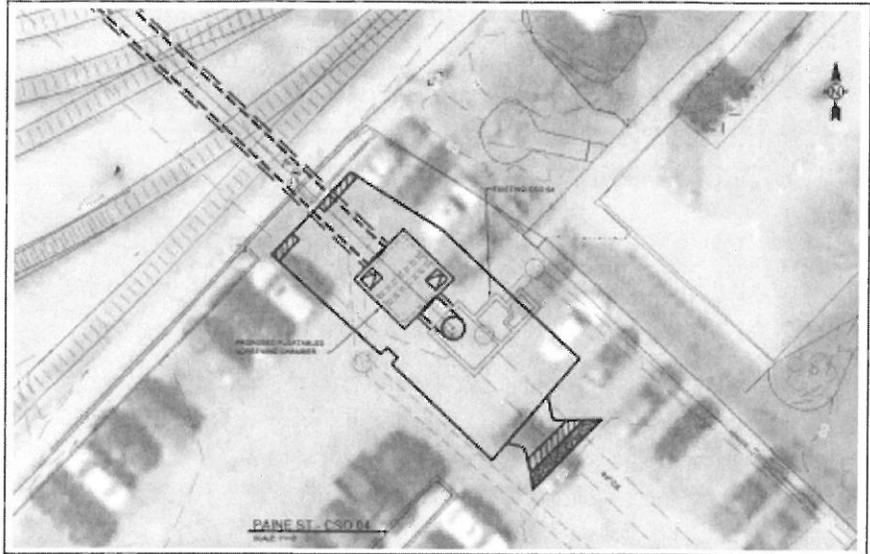
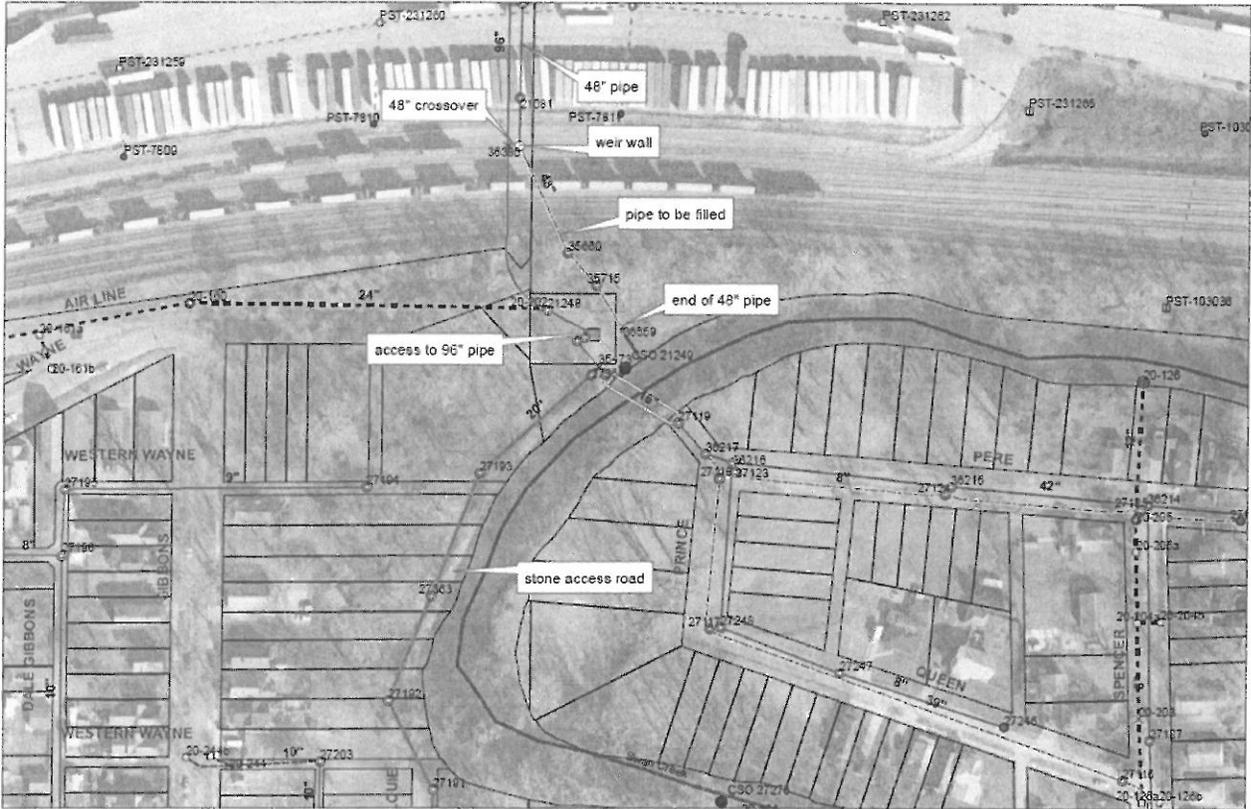


Figure 4. 48" Pipe to plug and access to the work area



Implementation

The City of Toledo is requesting to borrow \$4,706,00 from the Water Pollution Control Loan Fund (WPCLF) for this project. The project qualifies for the standard low interest rate of 2.08% on \$1,760,000 and 0% CSO discount on \$3,000,000. By using the WPCLF low-interest loan and CSO discount, Toledo will save \$2,438,000 over the life of the loan compared to the current market rate of 3.33 %.

Toledo planned rate increases to pay for projects that were mandated by the consent decree. The average residential sewer rate is \$38.46/month or \$461.52 per year. By 2021, sewer rates are expected to be \$49.00/month, or \$588 per year. This is less than the current average annual residential sewer rate of \$655. It is also 1.7% of the MHI (\$33,687) which is considered affordable.

The following is the project implementation schedule:

Activity	Date
Advertise for construction bids	August 3, 2018
Open bids	September 4, 2018
Loan award	October 25, 2018
Notice to proceed	By January 1, 2019
Construction Complete (LTCP Milestone)	May 30, 2019 (May 30, 2020)
Project Operational (LTCP Milestone)	August 31, 2019 (August 31, 2020)
Project Fully Operational (LTCP Milestone)	August 31, 2019 (August 31, 2020)

Public Participation

The Toledo Waterways Initiative (TWI) group meets quarterly with the Citizens Program Advisory Committee that represents the public. For more than a year, this project has been discussed with this group. In addition, quarterly briefings on the TWI program are provided to Toledo City Council's Water Quality & Sustainability Committee. The project has been presented at these meetings, which are open to the public, for over a year. Often, these meetings are reported on by the local media. The construction ordinance for the project was also presented to Toledo City Council for approval at Agenda Review, which is open to the public and often reported on by the local media. Regarding communications with the private industries directly affected by the work, the project design team had several meetings with owners and management personnel to discuss project details and secure temporary construction easements.

Given the limited potential environmental impact of the project, the affordability of rate increases, and the lack of public opposition, this public participation is considered adequate.

Conclusion

The proposed project is of a general project type (minor upgrade to existing facilities) that qualifies for a Limited Environmental Review. Specifically, it meets the following criteria:

It will have no significant adverse environmental effect: The project locations are in highly industrialized areas. There are no high-quality environmental resources present.

It will not affect any special resource type: No high-quality resources are located in the area of construction for this project. Work will be mostly subsurface and in existing pipes.

It will not require specific impact mitigation: Given the minimal scope of this project, and negligible environmental impact, no mitigation is needed.

It is cost-effective. Upgrading combined sewer regulators is more cost effective than complete replacement.

It is not controversial. It is affordable and, provided the construction best management practices are followed, there will be no adverse environmental impacts.

It does not involve a new or relocated discharge to surface or ground water, involve any increase in volume of discharge or loading of pollutants from an existing source or new facilities, create a new source of water withdrawals from either surface or ground waters, or significantly increase the amount of water withdrawn from existing sources; or provide capacity to serve a design population substantially greater (thirty percent) than the current design population. This project minimizes combined sewer overflows and has no other impact on the sewer system, discharges, or wastewater treatment plant.

The planning activities for the proposed project have identified no potentially significant short-term or long-term adverse impacts to the quality of the human environment or to sensitive resources (floodplains, wetlands, surface water, endangered species or their critical habitat, cultural properties, raw water supplies, scenic or recreational rivers, air quality, farmland, or state and federal wildlife areas). The project locations are in highly industrialized areas. The Paine and Fassett regulators, specifically, are located in easements on private industrial lots. Some of the work associated with these locations will also occur in the City of Toledo right-of-way. Impacts related to dust, noise and odors will be temporary. Erosion control and best management practices will be monitored by the Toledo Division of Environmental Services.

For further information, please contact:

Linda Merchant-Masonbrink

Division of Environmental & Financial Assistance

Ohio Environmental Protection Agency

P.O. Box 1049

Columbus, Ohio 43216-1049

Phone: (614) 644-3656, E-mail: L.merchantmasonbrink@epa.ohio.gov