



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

April 28, 2022

Limited Environmental Review and Finding of No Significant Impact

**City of St. Marys – Auglaize County
Wastewater Treatment Plant Upgrades
Loan number: CS390825-0004**

The attached Limited Environmental Review (LER) is for a wastewater treatment project in Auglaize County 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 WSRLA 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 attached LER.

Upon issuance of this Finding of No Significant Impact (FNSI) determination, award of funds may proceed without further environmental review or public comment unless new information shows that environmental conditions of the proposed project have changed significantly.

Sincerely,

Kathleen Courtright

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Wastewater Treatment Plant Upgrades

Applicant: City of St. Marys
101 East Spring Street
St. Marys, Ohio 45885

Loan Number: CS390825-0004

Project Summary

The City of St. Marys has requested financial assistance from the Ohio Water Pollution Control Loan Fund (WPCLF) for the Wastewater Treatment Plant Upgrades project. Work for this facilities improvement project will include the construction of new sludge dewatering and storage facilities to help St. Marys comply with its National Pollutant Discharge Elimination System (NPDES) permit limits. The estimated loan amount is \$6,722,700. Debt for the project will be repaid from monthly sewer rates and the St. Marys Sewer Fund. The project is scheduled to begin in summer 2022 and be completed in 15 months.

History & Existing Conditions

The City of St. Marys, Auglaize County (see Figure 1), owns and operates a sanitary sewer system and wastewater treatment plant (WWTP) that serves customers in the city and adjacent service areas. The St. Marys WWTP has an average daily flow of 1.98 million gallons per day (MGD) and is designed to treat an average daily flow of 3.0 MGD. Treatment plant processes and equipment include fines screening, grit removal, oxidation ditch, ferrous chloride for phosphorus removal, secondary clarification, and ultraviolet (UV) disinfection. The treatment plant also includes a 2.7-million-gallon equalization basin at the headworks. Sludge is processed with anaerobic digestion and gravity thickening.

The St. Marys WWTP operates a biosolids management program that land applies anaerobically digested liquid sludge to available farmland and city-owned properties. The biosolids program has been strained at times due to the inability to reliably access farmland due to wet weather, crop growing seasons, and application restrictions. The current solids handling system is at maximum capacity based on anaerobic digestion and biosolids storage requirements. The inability to manage the waste solids and remove them from the site results in high solids concentrations in the plant. The high solids concentration impacts treatment and requires peak flows to be limited through the plant during storm events to avoid solids washout and to comply with NPDES permit effluent limitations. This results in sanitary sewer overflow (SSO) events occurring at the WWTP which discharge to the St. Marys River. St. Marys negotiated an NPDES permit modification with Ohio EPA to address these conditions and will perform dewatering improvements as part of the modification. St. Marys also intends to replace the existing UV disinfection equipment and rehabilitate the WWTP pumping station.

Project Description

The Wastewater Treatment Plant Upgrades project (see Figure 2) generally consists of the following:

- Demolition of the existing aeration and final settling tanks, blower building, chlorination building and tank, and sludge holding tank
- Construction of a new sludge dewatering building, dewatering press, polymer feed equipment, and dewatered sludge conveyance equipment
- Installation of equipment in the sludge control building, including a sludge grinder, sludge press feed pumps, sludge piping, and a bubble mixing system
- Upgrades to the UV disinfection facility and plant pumping station

Implementation

The total estimated loan amount for the project is \$6,722,700, and St. Marys proposes to borrow the entire cost for the project from Ohio's WPCLF. St. Marys will recover debt associated with the project with revenue generated by monthly sewer fees and the St. Marys Sewer Fund. St. Marys qualifies for the WPCLF small community long-term interest rate, which for May 2022 is 1.06 percent, over 20 years (WPCLF loan interest rates are set monthly, and the rate may change for a later loan award). The 2022 monthly residential sewer rate in St. Marys is \$69.37 (\$832.44 annually), based on an average monthly usage of 1,037 cubic feet of water. This is 1.48 percent of the median household income of \$56,430, as compared to the state average of 1.3 percent.

Borrowing \$6,722,700 at 1.06 percent will save St. Marys approximately \$1,356,000 over the life of the loan compared to borrowing the same amount at the current market rate of 2.81 percent. Construction is expected to begin in the summer of 2022 and be completed in 15 months.

Public Participation

This project has been discussed in multiple St. Marys Board of Control and City Council meetings, which were advertised in local media, open to the public, and allowed for review and comment, and has also been discussed in local media, with no negative feedback noted. The Limited Environmental Review will also be posted on St. Marys and Ohio EPA Division of Environmental and Financial Assistance websites. Thus, there have been adequate opportunities for information dissemination and public participation.

Conclusion

The proposed project meets the project type criteria for a Limited Environmental Review; namely, it is an action within an existing public wastewater treatment system, which involves the functional replacement of and improvements to existing mechanical equipment. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no adverse environmental effect and will require no specific impact mitigation, as there are no known sensitive environmental resources within the proposed project area. The proposed project activities include improvements within the boundaries of an existing WWTP that has experienced extensive prior excavation. There will be no significant adverse effects as a result of project implementation, or the need for any additional mitigation measures beyond typical erosion control and construction best management practices. Therefore, the project will not have any long-term negative impacts on any historical resources.

Will have no effect on high-value environmental resources, as construction will take place within the boundaries of an existing WWTP that has experienced extensive prior excavation and where no high-value resources are present.

Is cost effective, as the proposed action was evaluated as the most cost-effective alternative, and improves wastewater treatment within the existing system.

Is not a controversial action, as there is no known opposition to the proposed project and the cost of the project is not overly burdensome to ratepayers.

Does not create a new, or relocate an existing, discharge to surface or ground waters, and 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 project only involves improvements to and replacement of infrastructure to improve the existing wastewater treatment facility and reduce SSOs.

Will not provide capacity to serve a population substantially greater than the existing population, since the project is not related to serving new growth or increasing capacity at the wastewater treatment facilities.

In summary, the planning activities for the project have identified no potentially significant adverse impacts. The project is expected to have no significant short-term or long-term adverse impacts on the quality of the human environment, or on sensitive resources (surface water, ground water, air quality, floodplains, wetlands, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, federal or state-designated wild, scenic or recreational rivers, federal or state-designated wildlife areas, or threatened or endangered species). Typical construction impacts, such as noise, dust, and exhaust fumes, will be short-term and addressed through the use of standard construction best management practices.

The proposed project is a cost-effective way to address necessary improvements within an aged WWTP. Once implemented, the project will improve aged infrastructure, helping St. Marys comply with its NPDES permit, improving the biosolids management program, reducing SSO discharges of untreated wastewater, and helping to protect surface waters, public health, and the environment. Also, by using WPCLF low-interest financing, St. Marys has minimized the project cost.

Contact information

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Figure 1: General project area



Figure 2: St. Marys WWTP and project area