



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

January 28, 2020

Limited Environmental Review and Finding of No Significant Impact

**City of Newark - Licking County
Fourth Street (Route 13) Sewer Separation Project
Loan number: CS390654-0017**

The attached Limited Environmental Review (LER) is for a wastewater collection project in the city of Newark 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, as described in [Ohio Administrative Code \(OAC\) 3745-150-05](#).

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, as described in [OAC 3745-150-06](#). 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,



Jonathan Bernstein, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Fourth Street (Route 13) Sewer Separation Project

Applicant: Roger Loomis, Utilities Superintendent
City of Newark
34 South Fifth Street
Newark, Ohio 43055

Loan Number: CS390654-0017

Project Summary

The City of Newark has applied for funding from Ohio EPA's Water Pollution Control Loan Fund (WPCLF) for the Fourth Street (Route 13) Sewer Separation Project (here forward referred to as the "Fourth Street Project"). The project is intended to separate and replace approximately 7,410 linear feet (LF) of aged and failing combined sewer primarily along Route 13 between Route 16 and the South Fork Licking River, and to reduce combined sewer overflows (CSO)¹. The total estimated loan for the project is \$21,219,367, with construction scheduled to begin in the first quarter of 2020 and be completed in 48 months.

History & Existing Conditions

Located within Licking County, Newark's collection system service area encompasses roughly 9,000 acres and is primarily within the municipal city limits. Newark's collection system consists of approximately 200 miles of combined and sanitary sewers, and 16 sanitary lift stations. The Newark Wastewater Treatment Plant (WWTP) is located at 1003 East Main Street, adjacent to the Licking River. The collection system and treatment facility serve approximately 47,000 residential customers, as well as numerous commercial and industrial customers.

Combined sewers make up approximately 18% of Newark's collection system. Roughly 1,183 acres contribute surface runoff to the existing combined sewer system and subsequently to the CSO diversion structures. 4% of Newark's sewers will be approaching the end of their useful life within the next 20 years. Recently Newark has adopted an integrated approach to address their aging combined sewers as part of their asset renewal program, in conjunction with providing CSO control. With the WPCLF-funded *City of Newark Downtown Sewer Separation Project* and other downtown sewer projects nearing completion, Newark is replacing their aging combined sewers in

¹ Combined sewer systems are sewers that are designed to collect rainwater runoff, domestic sewage and industrial wastewater in the same pipe. Most of the time, combined sewer systems transport all of their flow to a sewage treatment plant where it is treated and then discharged to a water body. During periods of heavy rainfall or snowmelt the combined flow volume in a combined sewer system can exceed the capacity of the sewer system or treatment plant. For this reason, combined sewer systems are designed to overflow occasionally (combined sewer overflow) and discharge excess combined sewage directly to nearby streams, rivers or other water bodies.

the downtown area with new sanitary and separate storm sewers through storm sewer separation. In addition, Newark is constructing green infrastructure in the project area to provide additional water quality benefits to the receiving stream.

There are currently 27 CSO diversion structures with 22 outfalls that discharge combined overflow to Raccoon Creek, South Fork Licking River, and North Fork Licking River, as authorized by Ohio EPA. All but one of these CSOs are active in a typical year.

The WWTP is designed to treat an average flow of 8 million gallons per day (MGD) of wastewater, and the current treatment capacity is 26 MGD. Newark currently limits the flow at the influent of the WWTP to 20 MGD, diverting any additional combined flow to the High Rate Treatment (HRT) facility that is located adjacent to the WWTP. Combined flow at the HRT receives screening and grit removal before being conveyed by gravity to an equalization (EQ) basin. The EQ basin has a capacity of 1 million gallons and has a junction chamber with an effluent isolation gate. The isolation gate modulates based on the influent flow to the WWTP, allowing flow from the EQ basin to drain back to the WWTP through the plant's main drain. If the EQ basin fills, an isolation gate at the HRT closes and the remaining combined flow downstream of the grit tanks receives full treatment through the HRT and subsequently discharges to the Licking River.

Newark submitted to Ohio EPA its Phase I Combined Sewer System Long Term Control Plan (LTCP) in September 1998 and the Phase I Combined Sewer LTCP Addendum in June 2004. The Phase I LTCP was developed by Newark to address the USEPA's requirements to treat or minimize CSO discharges. The addendum to the Phase I LTCP identified a plan to transport more wet weather flow to the existing wastewater treatment plant (WWTP) and a physical/chemical high-rate system to treat the increased peak flows at the WWTP. This recommendation was accepted by Ohio EPA and a compliance schedule was included in the NPDES permit that became effective August 1, 2006, with a modification being effective December 1, 2007.

Per the most recent National Pollutant Discharge Elimination System (NPDES) permit, Newark is required to prepare an LTCP Phase II. Newark submitted a draft of this plan to Ohio EPA in December 2016. The draft LTCP Phase II provided a prioritized, phased, and integrated approach for implementation of recommended projects to address Newark's remaining CSOs. Newark met with Ohio EPA in February 2017 to discuss the draft LTCP Phase II and is awaiting final plan approval.

As part of the LTCP Phase II, Newark identified four priority asset renewal areas that include critical areas of aging sewers, trunk sewers in most need of repair, maintenance issues, historic occurrences of surface flooding and water-in-basements, older water mains, and future plans for urban renewal. The Fourth Street Project is part of Priority Area 1 of this study and includes brick sewers that are approximately 130 years old and in urgent need of repair. Frequent maintenance is performed within this area to remove bricks that have fallen out and ended up at the influent to the CSO, as well as emergency repairs to address sink holes and infiltration. Due to the shallow nature and poor condition of these brick sewers, there is concern about the structural integrity of the sewers and street stability.

Project Description

The scope and approach of the Fourth Street Project (see Figures 1 and 2) were developed from the LTCP Phase II recommendations, and consists of the following:

- Replacing aged and deteriorated 36- and 48-inch brick combined sewer with approximately 7,410-LF of 8-inch through 54-inch sanitary sewer, primarily consisting of fiberglass-reinforced polymer mortar and polyvinyl chloride.
- Installing approximately 6,835 LF of 12-inch through 42-inch diameter storm sewer.
- Upsizing the underflow sewer pipe for CSOs 1014A and 1014B.
- Installing green infrastructure, including bioswales, brick clay pavers, green planting areas, and shade tree bumper islands. Green infrastructure is estimated to reduce stormwater runoff volumes by 20%.
- The project also includes street reconstruction, streetscaping, replacement of fire hydrants, electrical work, and restoration activities.

Implementation

Newark proposes to borrow the eligible cost for the project from Ohio's WPCLF. Newark will recover debt associated with the project from monthly sewer rates, and Newark has nominal rate increases scheduled through 2030 to pay for the numerous wastewater projects and improvements both completed and planned. The 2020 monthly residential sewer rate in Newark is \$26.79 (\$321.48 annually), based on average monthly water usage. This is 0.83 percent of the median household income of \$38,913, which is considered affordable.

The total loan amount is \$21,219,367. This project qualifies for a zero percent, 30-year construction loan for CSO-related projects. Borrowing at zero percent will save Newark approximately \$9,230,000 over the life of the loan compared to the current market rate of 2.54 percent. Construction is expected to begin in the first quarter of 2020 and be completed in 48 months.

Public Participation

Newark has worked closely with the general public and local public officials on earlier projects located in their community that were funded through the WPCLF. The Fourth Street Project has been discussed at Newark City Council and Service Committee meetings, has been detailed on Newark's website, and many affected residents and/or property owners have been spoken to directly about the project. Advance notice to residents in the form of a letter and various other forms of public noticing will precede construction. Newark is not aware of controversy surrounding this project.

Conclusion

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

Will have no significant environmental effect and will require no specific impact mitigation because construction will not adversely affect any special resource type, general construction environmental protections will be in place, construction actions will be timed to mitigate impacts to potential Indiana bat roosting trees, noise will be controlled with silencers on mobile equipment, dust and odors will be controlled, and air quality will be protected with emissions controls on mobile equipment and with the use of street sweeping and dust suppressants, as applicable. The project will have the public health and environmental benefits related to reducing risks related to potential human contact with raw sewage and the associated nutrient discharge to streams from CSOs.

Will have no effect on high-value environmental resources because the construction will be limited to the replacement of sewer pipes within the existing sewer alignment and utility rights-of-way. There will be no effects to the following: floodplains, wetlands, state and federally designated wild and scenic rivers, recreational rivers, or wildlife areas, and archaeological, historic or cultural resources.

Is cost-effective because the planned project is the most cost-effective alternative, as it will increase wet-weather storage and transport, reduce CSO events, eliminate structures that are aged and failing, and optimize existing wastewater infrastructure to allow for future LTCP Phase II projects.

Is not a controversial action because nominal local rate increases have been instituted to pay for various improvements to Newark's wastewater collection and treatment system in response to Newark's required LTCP and LTCP Phase II. The rates that Newark applies to its general service area are affordable. It will have no effect on population, nor will it have significant adverse environmental effects that could raise public concern.

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 the loading of pollutants from an existing source or from new facilities to receiving waters because the project does not require the expansion of Newark's wastewater treatment facility beyond its current design capacity, the installation of a satellite treatment facility, or other action that could increase discharges or add or relocate discharge points.

Will not provide capacity to serve a population substantially greater than the existing population because increases in treatment capacity or service extensions into undeveloped areas have not been included in the project. Thus, the project will not result in adverse secondary (development-related) environmental impacts, such as farmland or wetland conversion for building purposes.

Contact info

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



Figure 1: General project location (in red).

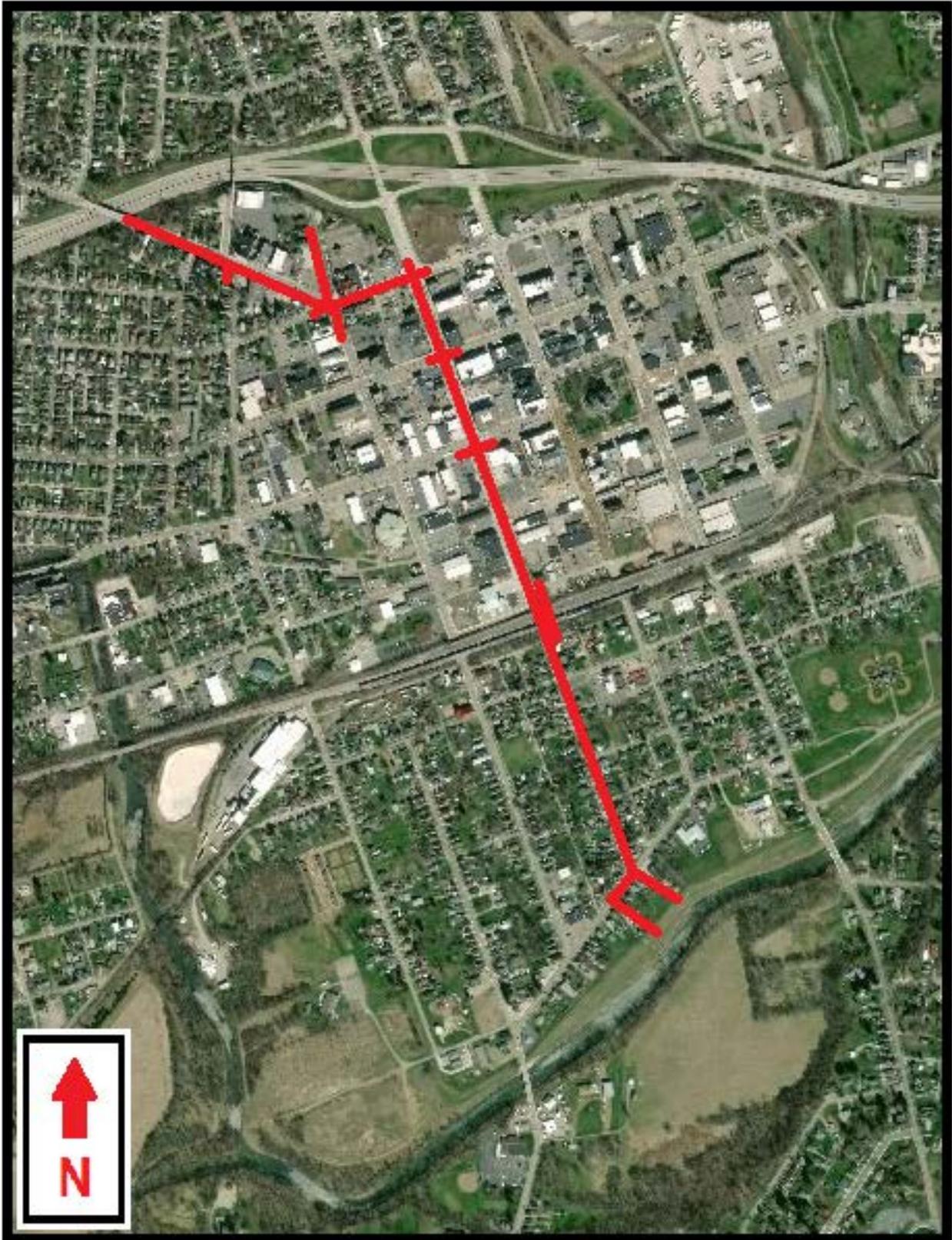


Figure 2: Project area (in red).