



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

**March 16, 2018**

**Issuance of A Limited Environmental Review  
To All Interested Citizens, Organizations, and  
Government Agencies**

**City of Ashtabula  
Ashtabula County**

**WPC Plant Digesters and Final Settling Tanks Upgrades  
Loan Number CS390121-0010**

The purpose of this notice is to advise the public that Ohio EPA has reviewed the referenced project and finds neither a Supplemental Study (SS) nor an Environmental Assessment (EA) is required to implement the project as discussed in the attached Limited Environmental Review (LER). Consequently, a Finding of No Significant Impact is being issued for this project.

The Water Pollution Control Loan Fund 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 action 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. A subsequent review by this Agency has found that the proposed action does not require the preparation of either an EA or an SS.

Our environmental review concluded that because the proposed project is limited in scope and meets all applicable criteria, an LER is warranted. Specifically:

- The proposed project will have no significant adverse environmental effect, nor will it adversely affect any specific resource type.
- It will not require extensive general or specific direct impact mitigation.
- It will not affect current design flow value or the existing service area.
- It is clearly cost effective.

- It is not controversial.
- It will not result in an increase in the volume of discharge or loading of pollutants to receiving water or increase the withdrawal of additional water supplies.

The LER presents additional information on the proposed project, costs and the basis for our decision. Further information can be obtained by calling or writing the contact person listed on the back of the LER.

Upon issuance of this determination, loan award 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,



*for*  
// Jerry Rouch, Assistant Chief  
Division of Environmental & Financial Assistance

Attachment

**LIMITED ENVIRONMENTAL REVIEW  
For  
City of Ashtabula  
Ashtabula County**

**WPC Plant Digesters and Final Settling Tanks Upgrades  
Loan Number CS390121-0010**

**Applicant: Mr. James Timonere, City Manager  
City of Ashtabula  
4717 Main Avenue  
Ashtabula, OH 44004**

## Existing Need

The City Ashtabula, in Ashtabula County, is requesting loan through Ohio's Water Pollution Control Loan Fund (WPCLF) to finance construction activities associated with the Water Pollution Control (WPC) Plant Digesters and Final Settling Tanks Upgrades project, here forward referred to as the WPC Digesters project. The project is needed to provide the City's wastewater treatment plant with the necessary upgrades to Primary Digester #3 for proper operation of the facility and to comply with the National Pollutant Discharge Elimination System (NPDES) permit. These upgrades will allow the City's wastewater treatment plant to meet its requirements for anaerobic sludge digestion.

Upgrades at the treatment plant have been under consideration over the last few years. During an inspection in July 2014, Ohio EPA's district office inspector identified several violations and critical concerns with the operation of the plant. Critical upgrades are required to ensure the plant operates safely and effectively. In addition to this project, upgrades are already taking place with the disinfection system, facility-wide electrical system, settling tanks, and sludge collection equipment.

The plant is located near the Lake Erie shoreline and the Ashtabula River and discharges to Lake Erie. Construction of the two primary digesters and one secondary digester began in 1951. Each digester is a concrete structure with a volume of 87,000 cubic feet. The digesters are utilized to break down organic matter present in the sewage sludge. The project will take place within the confines of the wastewater treatment plant (WWTP).

No increase in capacity or discharge limits will occur as a result of the proposed project. The 20-year facility plan updated in 2008 projects very little if any growth within the service area.

The total cost of the WPC Digesters project is \$1,717,510. The City of Ashtabula is anticipating an April 2018 WPCLF loan, with construction scheduled to be completed in ten months.

## Project Description

This project includes a portion of the necessary upgrades to the City of Ashtabula's treatment plant as identified by an Ohio EPA inspection. The poor condition of the plant due to age necessitated that the City perform a thorough evaluation of the plant and develop a plan to address deficiencies in its operation. The initial plant evaluation, entitled *City of Ashtabula Water Pollution Control Facility Evaluation – Evaluation of the Existing WPC Treatment Plant, Recommended Repairs and Improvement*, was submitted to Ohio EPA on September 30, 2015. Within the evaluation report the recommended digester rehabilitation/repairs included cleaning the digesters to evaluate the digester cover condition, replacement of sludge and gas piping, valves, heater/heat

exchangers, and the gas safety equipment and installation of a mixing system for the primary digesters. A number of the recommended repairs have already taken place using monies from the City's Water Pollution Control Operating Budget.

The improvements falling under this project will occur on existing units throughout the plant and are listed below:

- Cleaning of Primary Digester #3, including: interior walls, interior piping and supports, floor, sump and ceiling.
- Cover rehabilitation of Primary Digester #3, including: painting of digester cover, removal of abandoned Perth Gas Mixing System, and resetting of cover.
- Piping replacement, including: digester gas piping meters and vents, supernatant piping, sludge piping, digester interior piping, HVAC piping, sludge sample piping, and roof drain piping.
- Replacement of new non-gas plug valves and valve appurtenances.
- Replacement of new gas plug valves and valve appurtenances.
- Replacement of new non-gas check valves and valve appurtenances.
- Replacement of new makeup air heating and dehumidifying unit, including ducts, piping, foundation, support structure and controls.
- Electrical improvements, including replacement of devices at the digester control building, administration building, and raw sludge building.
- Installation of a new stone access drive, including erosion and sediment controls, drainage improvements, and repairs to existing pavement.
- Bid Alternate – Primary Digester #3 Cover Replacement, including Duo-Deck Floating Cover, slide guides, and painting.
- Bid Alternate – Heater/Heat Exchanger for Primary Digester #3, including replacement of heater/heat exchanger, water and gas line modifications, flue/stack modifications, and control wiring.
- Bid Alternate – Building Modifications, including isolation of the gas metering room, and various digester tank and control building repairs.
- Bid Alternate – Gas Safety Equipment, including replacement of drip traps, accumulators, flame traps, ignitors, flame cells, gauges, and buried piping.

## **Implementation**

The total cost of the WPC Digesters project is \$1,717,510. The City of Ashtabula has been awarded \$585,000 in Community Development Block Grant (CDBG) funds to help with project funding. The City proposes to finance the \$1,132,510 balance of the project costs through the WPCLF, which is administered by Ohio EPA's Division of Environmental and Financial Assistance. The project service area qualifies for the standard WPCLF below-market interest rate on 20-year loans (1.95 percent for March 2018), which is adjusted monthly to reflect market conditions. Borrowing \$1,132,510 at 1.95 percent will save the City of Ashtabula approximately \$169,000 over the life of the loan compared to the current market rate of 3.2 percent.

The City of Ashtabula has a population of approximately 18,663, and a median household income (MHI) of \$28,265, according to the 2011-2015 American Community Survey. The average 2-month sewer bill for a household in the City of Ashtabula is approximately \$49.40, or \$296.40 annually, which represents 1.03 percent of the MHI. This rate reflects a 1.8 percent increase that is scheduled to take effect June 1, 2018, as well as administrative and capital debt fees. An additional increase of 1.8 percent is scheduled for June 1, 2019. This increase would raise rates to \$300.35 annually, or 1.4 percent of MHI. These rates are considered affordable.

## **Public Participation**

The project has been discussed at several City of Ashtabula Council meetings that are open to the public. Furthermore, multiple articles about the project have appeared in the local newspaper. There is no record of public opposition to this project. Ohio EPA will provide a copy of its Limited Environmental Review (LER) decision and Finding of No Significant Impact for this project to interested parties upon request. Additionally, this document will be posted on the City of Ashtabula and Ohio EPA websites.

## **Conclusion**

The proposed project meets the project type criteria for a Limited Environmental Review; namely, it is an action in a sewer community for the upgrade of existing structures within existing facilities. Furthermore, the project meets the other qualifying criteria for a 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 the upgrades to and replacement of existing structures within the previously-disturbed footprint of the existing plant. 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;

- *Will have no effect on high-value environmental resources*, as construction will take place only within the existing treatment plant, where no high-value resources are present, or close at hand;
- *Is cost-effective*, as there are no meaningful alternatives to the proposed action and the project will be financed through the WPCLF and save approximately \$169,000 in interest payments over conventional financing. Furthermore, the project is scheduled to receive a \$585,000 CDBG grant to further reduce project costs;
- *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*, since the project only involves upgrades to and replacement of structures and equipment related to functions of the existing treatment plant;
- *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 proposed project does not involve any change in pollutant loadings, discharges, or other activities that might increase system capacity. Rather, it proposes upgrades to and replacement of the existing settling tanks and digesters that will allow the treatment plant to operate efficiently, and;
- *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 WWTP.

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 best management practices.

The proposed project is a cost-effective way to address necessary upgrades to the existing primary digester, piping and electrical systems. Once implemented, it will help to maintain the satisfactory operation of the existing wastewater treatment plant, thereby protecting public health. Also, by using WPCLF low interest financing and a CDBG grant, the City of Ashtabula has minimized the project cost.

I. **For further information, please contact:**

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Figure 1: General project location in red.



Figure 2: Ashtabula Water Pollution Control Plant