



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

April 25, 2022

Limited Environmental Review and Finding of No Significant Impact

**Mahoning County
Diehl Lake WWTP Improvements
Loan number: CS390050-0032**

The attached Limited Environmental Review (LER) is for a wastewater treatment plant project in Mahoning 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 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 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: Diehl Lake WWTP Improvements

Applicant: Mahoning County
761 Industrial Road
Youngstown, Ohio 44509

Loan Number: CS390050-0032



Figure 1. Mahoning County

Project Summary

Mahoning County (Figure 1) has requested \$1,481,314 from the Ohio Water Pollution Control Loan Fund (WPCLF) to replace the deteriorated Diehl Lake wastewater treatment plant (WWTP). Completion of this project will ensure continued system reliability to provide safe and effective sewage treatment for area residents.

History & Existing Conditions

The Sanitary Engineering Department of Mahoning County is responsible for the transport and treatment of wastewater generated by customers in the unincorporated areas of Mahoning County; this includes the townships of Austintown, Beaver, Boardman, Coitsville, Canfield, Jackson, Milton, Poland, and Springfield, and the villages of Craig Beach, New Middletown, Poland, and Campbell. Mahoning County's sanitary collection and treatment system consists of five major treatment facilities, 830 miles of sanitary sewer, and 56 pumping stations. In total, Mahoning County provides sanitary sewer service to over 40,000 households and businesses and treats over eight billion gallons of wastewater per year.

Mahoning County owns and operates Diehl Lake WWTP, located northeast of Upper Diehl Lake at the intersection of SR 45 and Kiwatani Trail. This is a small, linear package treatment plant that serves residents and small businesses within roughly a mile of the facility. In its current configuration, the plant can treat a total of 30,000 gallons per day (gpd) of wastewater and discharges to West Branch Meander Creek. This plant was constructed over 20 years ago and is experiencing considerable deterioration of the tanks and equipment. Additionally, maintenance and repairs to the plant are challenging due to its linear, non-redundant configuration. If left alone, the plant will continue to deteriorate, increasing the likelihood of a major system failure.

Mahoning County proposes to replace the existing WWTP with new, longer lasting infrastructure before the current plant experiences major deterioration or failure.

Project Description

This project involves the replacement of the Diehl Lake WWTP with a new package plant rated for a total treatment capacity of 40,000 gpd. The new plant will utilize parallel process trains, with each of

the two trains having a treatment capacity of 20,000 gpd. This will allow plant operators to shut down and perform maintenance and repairs on half of the treatment system while the other half remains in service and treats incoming waste flows. A new building will be constructed to house the blowers, and the existing building will be renovated for maintenance usage and sample management. Also included are various electrical, control, and pavement upgrades.

See Figure 2 below for the proposed construction site plan.

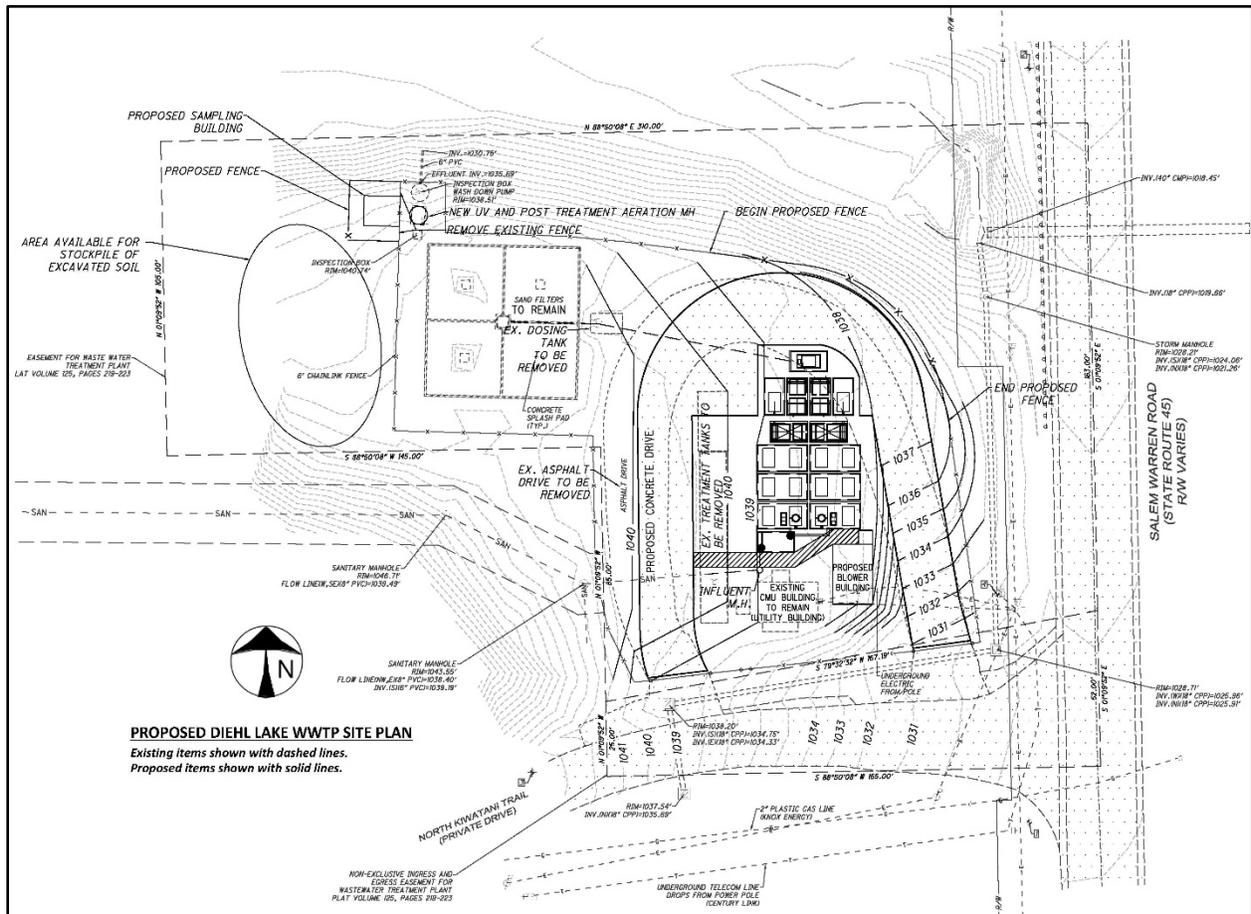


Figure 2. Proposed WWTP site plan

Implementation

Mahoning County proposes to borrow \$1,481,314 from the Ohio WPCLF at the standard rate of 1.28 percent (interest rates are set monthly and may change for the requested June award date) to cover the cost of this construction project and \$113,330 in previous design cost. Borrowing WPCLF funds at this rate could save Mahoning County approximately \$348,000 over a 30-year loan period compared to the current market rate of 2.58 percent.

The debt associated with this construction project will be recovered from user charges. Under the current resolution, the rate of metered water consumption and fixed monthly rate per customer increased in 2020, 2021, and 2022, and is planned to increase in 2023 and 2024. Upon completion of

this project, the average annual sewer bill for residents served by Mahoning County will be \$394. This is 0.86% of the median household income for Mahoning County (MHI; \$46,042) and compares favorably to the Ohio average bill of \$749.

Construction is expected to begin following loan award and be completed by the end of 2022.

Public Participation

The Mahoning County Sanitary Engineering Department website contains information for public viewing regarding this project, including a description of and need for this project, an aerial photo of the existing WWTP facility, and the proposed WWTP site plan. Information regarding this project and its various stages has been discussed at county commissioner board meetings throughout 2021 and 2022. Minutes for these meetings are available on Mahoning County's website.

Ohio EPA is unaware of controversy about or opposition to this project. Ohio EPA will make a copy of this document available to the public on the following webpage and will provide it upon request: <https://epa.ohio.gov/wps/portal/gov/epa/divisions-and-offices/environmental-financial-assistance/announcements>.

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 treatment system, which involves the functional replacement of and improvements to the existing Diehl Lake WWTP. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect, will have no effect on high-value environmental resources, and will require no specific impact mitigation. Construction of the new WWTP and other previously mentioned upgrades will take place within the boundaries of the existing treatment plant property. A small area outside of the maintained portion of the property will be used for temporary stockpiling of excavated soil. This small area and the maintained portions of the property lack suitable habitat for state and federally listed endangered and threatened species; therefore, it has been concluded that this project should not adversely impact listed threatened and endangered species. Construction will not take place within any wetlands, as the property was previously filled and raised during construction of the original WWTP. The contractor will be responsible for implementing standard construction best management practices to control noise, dust, and erosion, and to maintain traffic during construction.

The Ohio Department of Natural Resources and United States Fish and Wildlife Service concurred with Ohio EPA's conclusion that the proposed construction is unlikely to impact state and federally listed endangered and threatened species and critical habitat.

It is unlikely that any historical properties or archaeological resources will be impacted by this project, as there are no historical properties in the project area and because all ground that will be disturbed during construction has previously been disturbed during original site grading for and installation of the existing WWTP.

Is cost effective. Mahoning County considered several alternatives for the Diehl Lake WWTP, including replacing the existing WWTP with a new plant with the same treatment capacity or replacing the existing WWTP with a new plant with an increased capacity. A "do nothing" alternative

was also considered but determined non-viable because it would do nothing towards correcting the deteriorated treatment system components and maintaining safe and reliable wastewater treatment service for area residents. The selected alternative to construct a new plant with an increased capacity was ultimately determined to be the most cost-effective solution to correct the deterioration issues because it has the added benefit of allowing plant operators to perform maintenance and repairs on half of the treatment system while the other half treats incoming waste flows.

Is not a controversial action. The sewer rate increases previously mentioned are not intended to cover the cost of this project or any one other specific project, and user rates will still compare favorably to the Ohio average upon completion of this project. The existing Diehl Lake WWTP will remain in service until construction of the new plant is complete and the new plant is thoroughly tested to prevent disruptions in sewer service to residents.

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. The new WWTP will receive and treat the same waste flows as the existing plant and will operate using the same discharge; thus, there will be no impacts or changes to discharges or pollutant loadings.

Will not provide capacity to serve a population substantially greater than the existing population. The increased capacity of the proposed WWTP is intended to allow the plant to effectively treat current wastewater flows with one half of the plant operating, allowing maintenance and repairs to be conducted concurrently on the other half. The increase in capacity is not intended to provide service to a greater population, nor is significant growth in the population expected in the Diehl Lake WWTP service area.

To conclude, Mahoning County's proposed project is sufficiently limited in scope and meets all applicable criteria to warrant an LER. The planning review of this project identified no potentially short-term or long-term adverse impacts on the quality of the human environment or on sensitive resources (surface waters, coastal zones, floodplains, wetlands, state-designated scenic and recreational rivers, prime and unique agriculture lands, aquifer recharge zones, archaeological and historically significant sites, threatened and endangered species, and state and federal wildlife areas). Rather, completion of this project will ensure Mahoning County's ability to continue to provide safe and reliable wastewater treatment service to Diehl Lake WWTP area residents.

Contact information

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