



October 24, 2011

Notice of Issuance of a Limited Environmental Review and Finding of No Significant Impact to All Interested Citizens, Organizations, and Government Agencies

**Akron Rack 25 Combined Sewer Overflow Sewer Separation
WPCLF# CS390095-0010**

The purpose of this notice is to advise the public that Ohio EPA has reviewed the referenced project and finds neither an Environmental Assessment (EA) nor a Supplemental Study (SS) is required to implement the project as discussed in the attached Limited Environmental Review (LER). Therefore, 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, a Limited Environmental Review is warranted. Specifically, this project to eliminate the Rack 25 overflow structure and remove combined sewage from the river and storm water from the sanitary sewage is considered construction of new ancillary facilities adjacent or appurtenant to existing facilities.

The proposed project:

- has no significant environmental effect;
- does not require extensive specific impact mitigation;
- has no effect on high value environmental resources;
- is cost effective;
- is not a controversial action;
- does not create a new, or relocate an existing discharge to surface or ground waters;
- 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; and
- will not provide capacity to serve a population substantially greater than the existing population.

The LER presents additional information on the proposed project, costs, and basis for our decision. Further information can be obtained by calling or writing the contact person named at the end 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 project have changed significantly.

Sincerely,

for Samuel M. Barnes
Gregory H. Smith, Chief
Division of Environmental and Financial Assistance

GHS/DH

c: NEDO-DSW
Sue Farmer, OWDA
File (2)

LIMITED ENVIRONMENTAL REVIEW

A. Project Identification

Project Name: Akron Rack 25 Combined Sewer Overflow Sewer Separation

WPCLF# CS390095-0010

Address: Patrick Gsellman, PE
Akron Engineering Bureau
166 South High Street
Akron, OH 44308

B. History and Existing Conditions

Akron has combined sewers (pipes that in dry weather carry sanitary sewage only, and during wet weather carry sanitary flows combined with storm drainage) in much of the city. When flows rise dramatically during and after rainfall, combined sewer overflow (CSO) structures ("racks") divert untreated sanitary sewage mixed with storm water to area streams. Such discharges are threats to human health and the environment.

Due to these historical and ongoing CSO events and partial treatment bypasses from its Water Pollution Control Station (WPCS) to the Cuyahoga River, Akron is now subject to a federal Consent Decree that requires, among other improvements, elimination of CSO structures throughout the sewer system and minimization of overflow events.

The Rack 25 service area, north of downtown Akron in the vicinity of Cuyahoga Street, has combined sewers and separate storm and sanitary sewers that carry residential flows. The Rack 25 CSO regulator diverts excess flows of storm water mixed with sanitary sewage to the Little Cuyahoga River. Separation of the sanitary and storm sewer flows in the Rack 25 service area and elimination of the CSO structure is a Specific Action Project in the Consent Decree.

C. Project Description

This project will eliminate the Rack 25 overflow structure and remove the combined sewage from the river and the storm water from the sanitary sewage.

Separation of storm flows from sanitary flows will be by constructing approximately 3,500 lineal feet of sanitary sewer, leaving the corresponding combined sewer to carry only storm flows (Figure 1). ADD SPACE Construction will be parallel to existing pipes in roads and in an off-road sewer easement, and includes replacement of approximately 1,300 lineal feet of water main that will be removed for the sewer installation. Modifications to the Rack 25 structure will eliminate the connection to the pipe discharging to the Little Cuyahoga River.

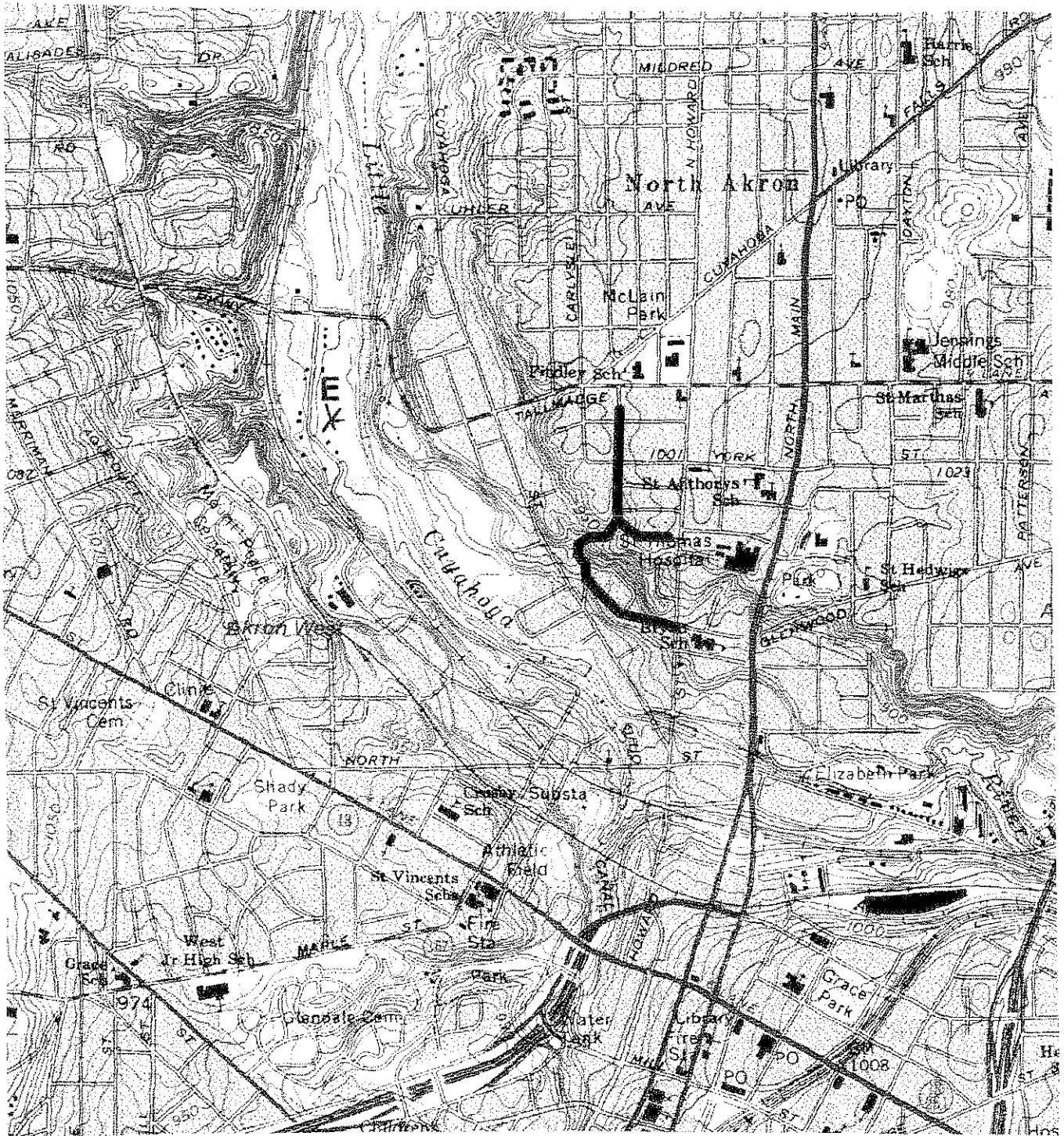


Figure 1 – Project Location

D. Estimated Project Costs

Akron will borrow approximately \$1,459,000 for design and construction costs from the Ohio Water Pollution Control Loan Fund (WPCLF) at the standard interest rate (now 2.85%). During the 20-year loan period, Akron will save approximately \$332,000 by using WPCLF dollars at this rate, compared to the market rate of 3.99%.

In exchange for sponsoring the purchase of the Silver Creek North Wetlands in this loan through the Ohio Water Resource Restoration Sponsor Program (WRRSP), Akron will receive an interest rate reduction of 0.1%. Additionally, interest that otherwise would be charged to the wastewater loan will be advanced to Akron to pay for the WRRSP project on behalf of Metroparks, Serving Summit County.

E. Project Schedule

Assuming loan award in October 2011, construction will start promptly and be completed by mid-2012.

F. Public Notification

Besides direct contact with landowners on the off-road easement, Akron posted a project fact sheet and request for public comment on its municipal webpage in mid-2011. A local newspaper carried the fact sheet as an article. No comments were submitted. Ohio EPA is unaware of opposition to or controversy about the project.

The Ohio EPA is sending this Limited Environmental Review (LER) decision and Finding of No Significant Impact to interested parties. Information supporting the LER is available from the project contact named below.

G. Planning Information

Akron's Long Term Control Plan, Facilities 98 Plan, and the Consent Decree identified the need for CSO corrections.

The proposed project was reviewed by the Ohio Department of Natural Resources, Ohio Historic Preservation Office, and United States Fish and Wildlife Service, as well as by the Ohio EPA. None of the review agencies opposes the project.

H. Conclusion

The proposed sewer separation and CSO elimination is construction of new ancillary facilities adjacent or appurtenant to existing facilities that qualifies for a LER and meets the following additional criteria for a LER:

It has no significant environmental effect; has no effect on high value environmental resources; and requires no extensive specific impact mitigation – Approximately half the

construction is in an existing off-road sewer easement and requires clearing that will remove several mature trees. The United States Fish and Wildlife Service concurred with Ohio EPA's determination that removal of those trees during cold weather as proposed is unlikely to adversely affect the endangered Indiana bat. No other important species or environmental features will be disturbed by this construction.

It is cost effective and is not controversial – This project requires no rate increase. Akron has instituted a multi-year rate increase to pay for the 20 years of projects required by the federal Consent Decree. The typical residential annual sewer bill now is \$353, which is approximately 1.1% of median household income (MHI; \$31,835 from the 2000 Census). A sewer bill less than 1.8% of MHI is considered affordable. These numbers compare favorably to the Ohio average residential sewer bill of \$514, which is 1.1% of state MHI (\$46,618).

Ohio EPA is unaware of controversy about or opposition to the project.

It does not create a new, or relocate an existing, discharge to surface or ground waters; it 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; and it will not provide capacity to serve a population substantially greater than the existing population – This project will help minimize the discharge of pollutants by eliminating routine CSO events while maintaining the sanitary sewer capacity and operation. The proposed separate sanitary sewers are in an area already served by sanitary sewer service and do not constitute extension of sewer service.

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 to minority or low-income populations or to the quality of the human environment or sensitive resources (floodplains, wetlands, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, or threatened or endangered species).

I. For further information, please contact:

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