



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

November 2, 2011

FINDING OF NO SIGNIFICANT IMPACT
TO ALL INTERESTED CITIZENS, ORGANIZATIONS,
AND GOVERNMENT AGENCIES

Akron Rack 8 Combined Sewer Overflow Elimination
WPCLF #: CS390095-0040

The purpose of this notice is to seek public input and comments on Ohio EPA's preliminary decision that a Supplemental Environmental Study is not required to implement the recommendations discussed in the attached Environmental Assessment of a wastewater facilities plan submitted by the City of Akron.

How were environmental issues considered?

The Water Pollution Control Loan Fund program requires the inclusion of environmental factors in the decision-making process. Ohio EPA has done this by incorporating a detailed analysis of the environmental effects of the proposed alternatives 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 and during site inspections. The Agency's preliminary Environmental Assessment found that the project does not require the preparation of a Supplemental Environmental Study.

Why is a Supplemental Environmental Study not required?

Our environmental review concluded that significant environmental impacts will not result from the action. Any adverse impacts have either been eliminated by changes in the facilities plan or will be reduced by the implementation of the mitigative measures discussed in the attached Assessment.

How do I get more information?

A map depicting the location of the project is included as part of the Environmental Assessment. The Environmental Assessment presents additional information on the project, alternatives that were considered, impacts of the action, and the basis for our decision. Further information can be obtained by calling or writing the contact person listed in the back of the Environmental Assessment.

How do I submit comments?

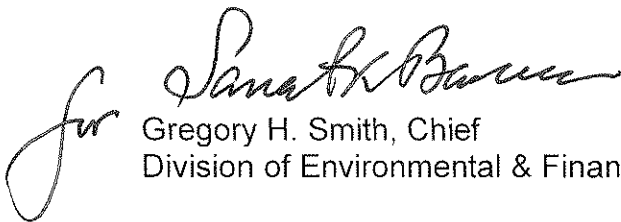
Any comments supporting or disagreeing with this preliminary decision should be submitted to me at the letterhead address. We will not take any action on this facilities plan for 30 calendar days from the date of this notice in order to receive and consider any comments.

What happens next?

In the absence of substantive comments during this period, our preliminary decision will become final. Akron will then be eligible to receive loan assistance from this agency.

Please bring any information that you feel should be considered to our attention. We appreciate your interest in the environmental review process.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gregory H. Smith".

Gregory H. Smith, Chief
Division of Environmental & Financial Assistance

Attachment

ENVIRONMENTAL ASSESSMENT

A. Project Identification

Name: Akron Rack 8 Combined Sewer Overflow Elimination

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

WPCLF #: CS390095-0040

B. Proposed Project

1. Summary

The City of Akron in Summit County has requested financial assistance from the Ohio Water Pollution Control Loan Fund (WPCLF) to eliminate a combined sewer overflow (CSO) that regularly discharges untreated combined sanitary and storm sewage to the Little Cuyahoga River in east Akron.

The Rack 8 CSO elimination involves constructing new sanitary sewers and storm sewers parallel to the existing combined sewer to separate the sanitary and storm flows into properly-sized pipes. Separate sewers will allow sanitary sewage to reach the Akron Water Pollution Control Station while storm flows will continue to run to the Little Cuyahoga River.

All work will be beneath pavement in existing streets or on industrial land previously disturbed by construction. The project will affect no important environmental features.

2. Project Background

a. 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 8 service area, east of downtown Akron in the vicinity of East Market Street has combined sewers that carry residential and commercial sanitary sewage. The Rack 8 regulator diverts excess flows of storm water mixed with sanitary sewage to the Little Cuyahoga River through a 36" diameter overflow outlet. Overflows occur on average 15 times per year with estimated total overflow volume of 1 million gallons per year.

Separation of the sanitary and storm sewer flows in the Rack 8 service area and elimination of the CSO structure is a Specific Action Project in the Consent Decree.

Because clean water connections to sanitary sewers can overload sewers and cause sanitary sewage overflows, this project will eliminate three identified storm water connections to a sanitary sewer and will extend a new storm sewer that will connect to storm inlets that now enter an existing sanitary sewer.

b. Population and Flow Projections

The project area is completely developed and Akron expects no significant population or economic growth in the project area. Sewers are appropriately sized for the present and expected flows.

c. Water Quality

The Little Cuyahoga River is designated Warm Water Habitat (WWH) in the Ohio Water Quality Standards. The river does not meet its WWH standard, due largely to being an urban-influenced stream significantly affected by urban runoff, channelization, and 24 CSO structures. This project will eliminate one CSO structure and associated discharges and another project constructed at the same time will eliminate the downstream Rack 25 CSO structure and associated discharges.

3. Discussion of Feasible Alternatives

Akron's history of CSOs led to development of its Combined Sewer Overflow Long Term Control Plan, Facilities 98 Plan, and the federal Consent Decree, all of which identified the need for CSO corrections. Because the federal Consent Decree could result in significant fines and because ongoing CSO pollution creates human and environmental health risks, "no-action" is not a viable alternative.

The city evaluated alternatives to develop CSO controls identified in the Consent Decree. For the sanitary sewage collection system (sewers), Akron evaluated pump station modifications (to increase wet weather pumping capacity and move more water faster to the WPCS), regulator modifications (to minimize the volume of combined flows discharged), sewer separation (to exclude storm water from the collection system so pipes carry only sanitary flows), express sewers (to carry flow from collection systems with separate sanitary and storm sewers directly to the main trunk sewer without adding flow to downstream combined sewers), and flow diversion (routing wet-weather combined sewer flows to pipes with additional capacity, if it exists).

Based on realities of pipes and flows in each sewer subsystem as related to the entire sewer system, and on economic factors, Akron determined the most feasible and cost-effective alternative(s) for each subsystem. Sewer separation was considered feasible for the Rack 8, 9, 13, 21, 25, 30, and 39 service areas.

4. Selected Alternative

This project will separate the existing combined sewers in the CSO Rack 8 service area (Figure 1) by:

- constructing (by normal excavation methods) approximately 4,200 lineal feet of 8 inch to 15 inch sanitary sewers in Case Avenue, Dublin Street, Dudley Street, Fulton Street, and East Market Street;
- constructing (by normal excavation methods) approximately 1,100 lineal feet of 12 inch to 36 inch storm sewers in Case Avenue, Dublin Street, Kent Street, and Laird Street; and
- lining with cured-in-place-pipe (CIPP) approximately 4,000 lineal feet of 8 inch to 36 inch sanitary and storm sewers in Case Avenue, Laird Street, East Market Street, Roger Avenue, and Willard Street. The CIPP process involves the insertion of a fabric tube impregnated with a thermosetting plastic into a sewer, usually through existing manholes, and circulating hot water or steam through the pipe to cure (harden) the plastic. After the liner is intake, a robot cutter opens the existing lateral connection holes to allow wastewater to enter the sewer. The seamless pipe lining prevents entry of extraneous water, restores structural integrity, and eliminates joints that can weaken and allow root intrusion. CIPP increases flow capacity because the new lining is much smoother than old clay, brick, or concrete pipe. CIPP rehabilitation is a "trenchless technology" because the work is typically completed through existing manholes with little or no excavation required and less traffic disruption than is typical with excavation construction

5. Project Implementation

Akron opened bids for this project in October 2011. Akron will borrow the total project cost, approximately \$2,720,000 (design, construction, and construction inspection) from the WPCLF at the standard interest rate (2.80%). During the 20-year loan period, Akron will save approximately \$648,000 by using WPCLF dollars at this rate, compared to the market rate of 3.99%.

Assuming loan award in December 2011, construction may begin in early 2012 and be completed in nine months.

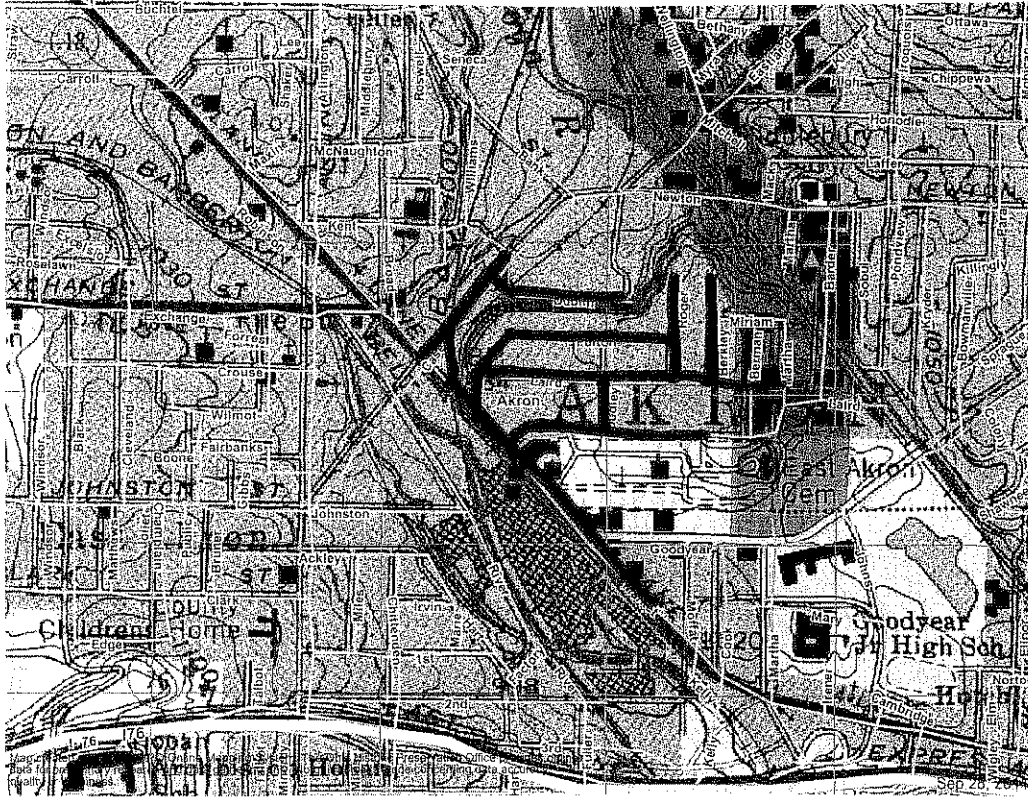


Figure 1 – Project Location

C. Environmental Impacts of the Proposed Project

This project could directly affect environmental features. Because the project is designed to properly manage existing sewers and flows, rather than provide additional capacity in the wastewater system for growth, the project is not expected to lead to new development or associated indirect or cumulative impacts.

Because CIPP lining requires no excavation, it will have no effect on important environmental features and only minimal effect on traffic, which will be controlled by standard construction traffic control measures (signs, barricades, safety cones). All work involving excavation is related to existing pipes and will be either in existing roads or industrial land lacking important environmental features. Construction will have no effect on local topography, floodplains, wetlands, terrestrial or aquatic habitats, agriculture, land use, or surface or ground water resources.

Short-term, insignificant increases in dust from excavated soil and local air pollution from construction vehicle exhaust may be expected during construction. Dust will be controlled by use of water or other benign dust control agents. Construction vehicle exhaust will be similar to that from vehicles regularly traveling the project area streets. For these reasons, the project should have no significant adverse short-term or long-term impacts on local air quality.

Construction vehicle noise, similar to background traffic noise in the project area, will be audible in the immediate project area.

Traffic will be temporarily disrupted as construction proceeds along the affected streets. Traffic disruption will be minimized by contractor use of typical construction traffic controls (barricades, barrels, signs, and, as necessary, law enforcement officers).

Public safety will be ensured by use of standard traffic controls and by covering or closing all excavations at the end of each work day.

Upon project completion and surface restoration, local aesthetics will differ from pre-construction conditions only in the elimination of odors that may have been associated with the operation of the combined sewer overflow.

Because this project adds no energy consuming equipment, the sewer separation will have no effect on local or regional energy supplies.

The Ohio Historic Preservation Office determined that it will not cause a significant adverse effect to properties listed or eligible for listing in the National Register of Historic Places (cultural resources).

In the event of archaeological finds during construction, Ohio Revised Code Section 149.53 requires contractors and subcontractors to notify the Ohio Historic Preservation Office of any archaeological discoveries in the project area, and to cooperate with the Office in archaeological and historic surveys and salvage efforts when appropriate. Work will not resume until a survey of the find and a determination of its value and effects have been made, and Ohio EPA authorizes work to continue.

This project requires no rate increase and will have no effect on the local economy. 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).

By using the WPCLF low-interest financing for this project, Akron has minimized the cost and the economic impact on residents.

D. Public Participation

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 following agencies reviewed this project's planning information:

Ohio Environmental Protection Agency
Ohio Historic Preservation Office

None of the review agencies opposes the project.

E. Reasons for a Preliminary Finding of No Significant Impact

Based on its review of the general plans, detail plans, and other information collected about this project, Ohio EPA concludes that no significant short-term or long-term adverse direct environmental impacts will result from the project as related to the environmental features discussed in this Environmental Assessment. This is because either these features do not exist in the project area, the features exist but will not be adversely affected, or the impacts of construction will be temporary and mitigated.

This project equally serves the entire Akron community, so no particular segment of the community will be faced with additional adverse impacts or be deprived of environmental benefits, compared to any other segment.

For these reasons, this project, alone or in combination with other projects, is not expected to result in any significant indirect or cumulative short-term or long-term adverse environmental impacts.

Ohio EPA expects the economic impact of the project on the average user to be insignificant because it requires no rate increase and Akron has minimized the project cost by using subsidized WPCLF financing.

The project is expected to eliminate the routine discharge of sanitary sewage mixed with storm water into the Little Cuyahoga River.

For further information, please contact:

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