



January 26, 2011

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

Columbus Combined Sewer Overflow (CSO) Regulator Sluice Gate Modifications
WPCLF CS390274-0129

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, project involves minor upgrading and minor rehabilitation of existing facilities that qualifies for a LER and meets the following additional criteria for a LER:

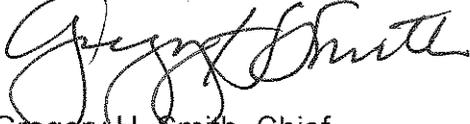
The proposed project:

- 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,

A handwritten signature in black ink, appearing to read "Gregory H. Smith". The signature is fluid and cursive, with the first name "Gregory" being more prominent and larger than the last name "Smith".

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

GHS/DH

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

LIMITED ENVIRONMENTAL REVIEW

A. Project Identification

Project Name: Columbus Combined Sewer Overflow (CSO) Regulator Sluice Gate Modifications

WPCLF# CS390274-0129

Address: Tatyana Arsh, P.E., Director
Columbus Department of Public Utilities
910 Dublin Road
Columbus, OH 43215

B. History and Existing Conditions

The City of Columbus is implementing its Ohio EPA-approved Wet-Weather Management Plan for the elimination of sanitary sewer overflows and combined sewer overflows to area streams. The 2005 Wet-Weather Management Plan was the result of administrative orders from Ohio EPA in 2002 and 2004. Large-scale capital improvements based on the plan, expected to cost \$2.5 billion over the next 40 years, include rehabilitation of older sewers and continual upgrades at the wastewater treatment plants.

Much of Columbus is served by combined sewers (pipes carrying sanitary sewage during dry weather and storm water and sanitary flows during wet weather) that have overflow pipes to direct excess flows to streams to prevent basement backups. Overflows can create environmental and public health threats due to the presence of human pathogens in wastewater. Overflows were acceptable and considered efficient engineering design before the environmental and human health threats due to overflows were well understood. Federal and state environmental regulations prohibit construction of new combined sewers and combined sewer overflows, and require the minimization of overflow occurrences from existing pipes.

Overflows may be minimized by structural changes and by lining sanitary sewers to seal out excess ground water or storm water that contribute to sewer backups and overflows.

Hydraulic modeling of the sanitary sewers that overflow to the Olentangy River and Scioto River determined that significant wet-weather flow could remain in the sewer system and reach the wastewater treatment plant for treatment if overflow regulators are modified.

C. Project Description

Columbus will modify existing combined sewer overflow (CSO) structures by removing sluice gates, increasing orifice areas, and raising overflow weirs to reduce CSO frequency and volume.

The project will remove the sluice gates from these regulators: Hudson Street, Doe Alley, Frambes Avenue, Indianola Avenue, First Avenue, Third Avenue, and King Avenue, Henry Street, Chestnut Street, Spring Street, Long Street, Broad Street, Liberty Street, Whittier Street, and Moler Street, and will raise the overflow weir at Designated Sanitary Relief (DSR) 83 and the sludge manhole at the Whittier Street Storm Tanks (Figure 1).

Construction at most of the sites will be entirely inside the existing structures and involve little or no land disturbance. At two structures, minor excavation of the perimeters is required to rehabilitate cracked concrete. Otherwise, limited vegetation removal will be involved at several of the sites and no other potentially significant environmental effect is expected.

D. Estimated Project Costs

Columbus expects to borrow approximately \$2,184,000 from the WPCLF at the standard interest rate of 3.28% to fund the proposed project. The city also qualifies for the Water Resource Restoration Sponsorship Program (WRRSP) 0.1% interest rate discount, which reduces the WPCLF interest rate to 3.18%, for sponsoring the Morgan Run Headwaters Wetland Restoration WRRSP project that will be implemented by Columbus and Franklin County Metro Parks (a separate environmental review document for the Morgan Run project was issued on October 15, 2010 and is available from the contact named at the end of this document). By participating in the WRRSP, interest that otherwise would be charged to the wastewater loan will be advanced back to Columbus to pay for the Morgan Run project. Columbus will save approximately \$375,400 over the 20-year life of the loan when compared to the market rate of 4.53%.

E. Project Schedule

Assuming loan award in January 2011, construction will start in early 2011 and be completed in early 2012 (contractual 12 month construction period).

F. Public Notification

The Columbus Division of Sewerage and Drainage web page carried a fact sheet and request for public comment on this project during 2010. No comments were received.

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.

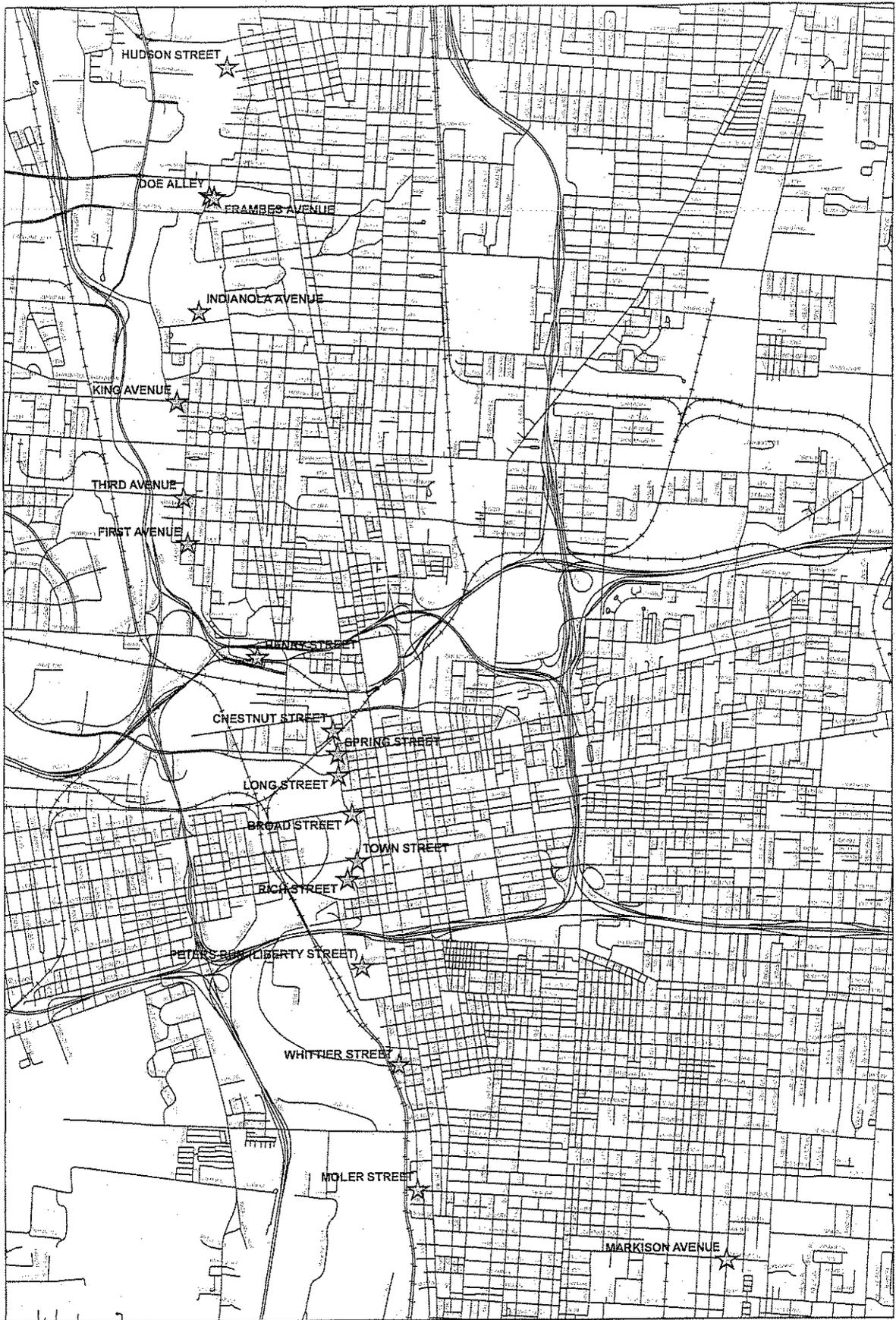


Figure 1 – Project Locations

G. Planning Information

The proposed project was reviewed by the Ohio Department of Natural Resources, Ohio Historic Preservation Office, U.S. Fish and Wildlife Service, and Ohio EPA. None of the agencies opposes the project.

H. Conclusion

The proposed combined sewer overflow sluice gate modifications involves minor upgrading and minor rehabilitation of 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 does not require extensive specific impact mitigation – Except for minor perimeter excavation and concrete repair, all work will be inside existing concrete structures and have no environmental effect. Perimeter excavation will require limited tree removal that will occur before April 1 or after September 30 to avoid potential effects on the federally-endangered Indiana bat. Because work will involve only existing infrastructure, no disturbance or significant adverse effect to properties listed or eligible for listing in the National Register of Historic Places will occur.

It is cost-effective and is not a controversial action – Modifying existing CSO structures to reduce overflow volumes and frequency is clearly less expensive and more cost-effective than constructing new sewers or similar infrastructure. The proposed project has very few adverse impacts and will not increase local sewer rates beyond those currently planned for Columbus customers, so it is not controversial. Columbus's median household income (MHI) is \$37,897 and the average annual sewer bill is \$478, which is 1.26% of MHI. This is slightly above the Ohio average of 1.1% (the 2009 state average annual sewer bill, \$514, as a percentage of the 2000 Ohio MHI). Sewer bills below 1.8% of MHI are generally considered affordable.

Columbus's projected average annual user cost is within the range of surrounding communities, namely: Cleveland (population 478,403) - \$421, Cincinnati (population 331,285) - \$578, and Toledo (population 313,619) - \$370. The population of Columbus is 711,470.

It 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 - This project to modify existing sanitary sewers to deliver more combined flows to the city's wastewater treatment plants (WWTPs) will not significantly alter the effluent discharges from the WWTPs, will not change the capacity of the pipes or add new discharge points, and will not substantially increase wastewater treatment service capacity.

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 (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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