



State of Ohio Environmental Protection Agency

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December 10, 2009

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

City of Lancaster
Lancaster Department of Transportation Stormwater Improvements
WPCLF Loan Number CS390504-0015 (CS396109-01)

The purpose of this notice is to advise the public that Ohio EPA has reviewed the referenced project and finds that neither an Environmental Assessment (EA) nor a Supplemental Study (SS) is required to complete the environmental review of the project. Instead, the proposed project meets the criteria for a Limited Environmental Review (LER). These criteria are summarized below in this document and in the attached LER.

The Water Pollution Control Loan Fund (WPCLF) program and the American Recovery and Reinvestment Act (ARRA) principal forgiveness program require 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 planning process. A subsequent review by this Agency has found that the proposed action does not require the preparation of an EA or an SS.

Our environmental review concluded that because the proposed project is limited in scope and meets all applicable criteria, a LER is warranted. Specifically, the proposed project constitutes an action in a sewered community that is for functional replacement of existing mechanical equipment or structures, and construction of new ancillary facilities adjacent or appurtenant to existing facilities. More specifically, the proposed projects entails building a new salt storage barn, relocating three chemical storage tanks, constructing a new vehicle wash-out facility, and connecting to the city's sanitary sewer system. Furthermore, 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;

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

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- 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.

A map depicting the location of the proposed project is included as part of the LER. The LER presents information on the proposed project, its cost, 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.

The LER was completed for the proposed project as it will not individually, cumulatively over time, or in conjunction with other Federal, State, local, or private actions have a significant adverse effect on the quality of the human environment. Consequently, a Finding of No Significant Impact can be issued now for the proposed project.

Upon issuance of this determination, award of funds may proceed without being subject to further environmental review or public comment, unless information is provided which determines that environmental conditions for the proposed project has changed significantly.

Sincerely,


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

GHS/KH

Attachment

LIMITED ENVIRONMENTAL REVIEW (LER)

Date: December 10, 2009

A. Project Identification

Name: City of Lancaster, Lancaster Department of Transportation
Stormwater Improvements Project

Address: The Honorable David S. Smith
Mayor, City of Lancaster
104 East Main Street
Lancaster, Ohio 43130



WPCLF #: Loan Number CS390504-0015

B. Existing Need

The City of Lancaster's Department of Transportation is responsible under its statewide general storm water permit issued on June 5, 2009 to meet this permit's good housekeeping requirements by eliminating runoff and storm water discharges from its existing salt storage barn and vehicle wash-out station, located southeast of downtown. Currently, these facilities drain to Baldwin Run, a warmwater habitat stream and tributary of the Hocking River. Due to their proximity to these two waterways, the city's two facilities periodically experience flooding that contributes to the water pollution problems in these streams. More specific information on the city's proposed two-part project can be found below.

C. Project Description

After determining that a no-action alternative would not address the requirements of its Municipal Separate Storm Sewer Systems (MS4) permit, the City of Lancaster's Department of Transportation established that it needed to complete a two-part project. The first part consists of construction of a 50 foot by 80 foot by 45 foot (2500 ton capacity) salt storage barn to replace the existing 3456 square foot salt barn built in 1974, a dedicated lift station, and a three-inch diameter force main. It also involves the installation of a 2500 gallon polymer holding tank designed to collect the brine mixture runoff from the salt hopper when it is being cleaned, and to store salt/storm water produced in the salt barn loading area, where the salt is loaded onto truck during the winter months. When full, liquid from the polymer holding tank will be pumped via the proposed three-inch diameter force main and an existing larger force main to the city's Lawrence Street Wastewater Treatment Plant (WWTP). Readers should note that when the rating of the pump station is exceeded and the polymer holding tank is full, any excess flows will be discharged to a proposed 181,400 gallon infiltration pond and then, if needed, onto an existing wetland. Finally, this project entails

the relocation of existing brine, calcium chloride, and additive tanks from the current salt barn location to the new location shown in Figure 1 below.

Part two consists of a new vehicle wash-out facility including a new masonry wash bay adjacent to an existing masonry storage building, oil interceptor, and six-inch diameter sanitary sewer. Flows from this facility will enter the city's sanitary sewer system at an existing manhole. The purpose of these proposed improvements is to eliminate storm water discharges of dirt, oil, soap, vehicle fluids, and salt to Baldwin Run.

The original estimated construction cost of this entire proposed project was \$650,000. The as-bid construction cost of this proposed project is slightly higher at \$669,120, with the total project cost calculated at \$870,397. Of this latter amount, Ohio EPA expects to provide funds to cover the entire costs of this proposed project. A map of the location of the proposed improvements is shown below in Figure 1.



Figure 1, City of Lancaster Department of Transportation Proposed Storm Water Improvements Locations

D. Project Implementation and Project Cost Estimates

To implement the proposed \$870,397 project described above, the City of Lancaster intends to finance the improvements to its Department of Transportation facilities through the American Recovery and Reinvestment Act (ARRA) "principal forgiveness" program and the Ohio EPA's Water Pollution Control Loan Fund (WPCLF) program. Under the WPCLF program, the City of Lancaster qualifies for a standard fixed interest rate, twenty-year loan. For the current quarter, through December 31, 2009, this interest rate is set at 3.25%. Readers should also note that ARRA federal stimulus funds are administered through the WPCLF program in the form of loan principal forgiveness, which is similar to a grant in that it does not require the repayment of the funds. The city has pledged its storm water revenue fund as the repayment source for the WPCLF loan. The total as-bid costs of this project are discussed further below.

For successfully nominating its Lancaster Department of Transportation storm water improvements project, and submitting as-bid costs to Ohio EPA, Lancaster qualifies for a maximum of \$350,000 in principal forgiveness under ARRA. As noted above, the balance of the project costs, \$520,397, is expected to be paid for with funds borrowed from the WPCLF.

E. Limited Environmental Review Criteria

Because Lancaster's proposed Department of Transportation storm water pollution improvements project meets certain minimum conditions and will not individually, cumulatively over the useful life of these improvements, or in conjunction with other federal, state, or private actions have a significant adverse effect on the quality of the human environment, a Limited Environmental Review (LER) is warranted. More specifically, the LER conditions cover actions in sewer communities like Lancaster that are for functional replacement of existing mechanical equipment or structures, and construction of new ancillary facilities adjacent or appurtenant to existing facilities.

Specifically, Lancaster's proposed improvements to its salt barn and vehicle wash-out facilities meet the following criteria:

- 1. The proposed project will have no significant adverse environmental effects.** As noted above, the city's proposed project consists of constructing a new salt storage barn, a dedicated lift station, three-inch diameter force main, a 2500 gallon polymer holding tank, storm water pond, vehicle wash-out station facility, and associated sanitary sewers within a previously disturbed area southeast of downtown Lancaster. A large part of the area to be used for the Salt Barn facilities was disturbed during the 1990s when soil was excavated for use as borrow material at Lancaster's Lawrence Street WWTP, and again in 2001 when the area was re-filled to protect the site from flooding. In addition, the site of the proposed city vehicle (e.g., street

sweeper) wash-out facility within the city's Department of Transportation facility has also been previously disturbed. As such, these two locations comprising the entire project area are generally devoid of any important natural or historic features that require special attention or could be adversely affected by the city's proposed project. Moreover, the minimal amount of surface disturbance needed to implement this project and the city's expectation that tree removal will be unnecessary suggest that the potential for direct, indirect, and cumulative impacts to the environment is minimal. Readers should note that an unavoidable aspect of this project is that the proposed improvements will be located within the floodplain of Baldwin Run and the downstream Hocking River. Because most improvements will be located below or at grade, no impacts on the flood water carrying capacity of area streams are expected. The first floor elevation of the Salt Barn structure itself will be one foot above the base flood elevation of 813 feet above mean sea level.

Residents of Lancaster using the project area should not notice any significant increase in truck traffic, air pollution, dust, or odors during the construction period. Provisions have been included in the contract documents to assure that trucks and other heavy equipment are properly maintained to minimize noise, dust, and air quality impacts.

- 2. The proposed project does not require extensive general or specific impact mitigation.** As all of the proposed work to complete this project is straight-forward and will occur within previously-disturbed, industrial portions of southeastern Lancaster, it does not require any extensive mitigation of environmental impacts. Where potential concerns about the short-term construction-related effects of the proposed project have been identified, these will be addressed by routine construction-related best management practices and adherence to a list of prohibited construction activities. These practices will assure that noise, dust, runoff, and odors from the construction area are properly controlled, and that no adverse offsite impacts on any environmentally sensitive locations occur.

- 3. The proposed project will have no adverse effect on high value environmental resources.** According to the reviews completed by federal, state, and regional agencies, no high value cultural or environmental resources are present within the areas shown in Figure 1. The previously-disturbed locations within this area of Lancaster chosen for the proposed improvements also support this conclusion. The nearest aquatic resources of any significance are Baldwin Run, the Hocking River, and their floodplains, but neither one will be adversely affected by the construction of the proposed project. Rather, the proposed improvements to the city's Department of Transportation facilities should result in maintained, if not improved, water quality within Baldwin Run and the Hocking River.

4. **The selected alternative for this project is clearly cost-effective.** In comparison to a no-action alternative, Lancaster has documented that its selected alternative for addressing its storm water runoff problems is clearly more cost-effective. The reason for this conclusion is that Lancaster has shown that leaving the current situation unaddressed will continue to pose a risk to the water quality of area streams.
5. **The proposed project is not a significantly controversial action.** Based on the lack of widespread public interest in this project (as evidenced by the low turnout at the June 22, 2009 public meeting and the lack of comments during the public comment period, which was open until June 30, 2009) and the fact that this project by itself will not result in an increase in wastewater rates or storm sewer fees, Ohio EPA has determined that this project is non-controversial.
6. **The proposed project does not involve new or relocated discharges to surface or ground waters.** The proposed salt barn and vehicle wash-out facilities will not entail any new or relocated discharge of wastewater to surface or ground water. Instead, the proposed project will eliminate runoff into Baldwin Run from the city's two facilities described in this document, and redirect it to sanitary sewers and, ultimately, the city's Lawrence Street WWTP for proper treatment and discharge under its National Pollutant Discharge Elimination System (NPDES) permit.
7. **No substantial increase in the volume of discharge or the loading of pollutants from an existing source or from new facilities to receiving waters will occur.** Based on the limited scope of the proposed salt barn and vehicle wash-out facilities discussed in this document, there will not be a substantial increase in the volume of wastewater discharged, or a significant increase in the loading of pollutants discharged, to Baldwin Run or the Hocking River. Rather, wastewater flows that should not go directly to these streams will be properly routed to Lancaster's Lawrence Street WWTP for treatment and discharge as required by the city's NPDES permit.
8. **The proposed project will not provide capacity to serve a population substantially greater than the design-year population.** As noted above, the purpose of this project is to address the storm water runoff problems at the city's Department of Transportation facilities. It is not intended to increase the capacity of the sanitary or storm sewer systems to convey wastewater or storm water, nor enlarge the city's Lawrence Street WWTP so it can treat more effluent. On this basis, this project is also not expected to exacerbate the current non-attainment status of Fairfield County under the Clean Air Act for fine particulate matter (PM 2.5) and eight-hour ozone by providing additional treatment capacity to support future growth.

F. Environmental Justice

Executive Order 12898, "Federal Action to Address Environmental Justice in Minority Populations," requires proposed federal actions to identify, address and avoid disproportionately high and adverse human health or environmental effects on minority and low-income populations. A key purpose of this proposed two-component project is to allow Lancaster to improve its Department of Transportation services to all its customers at an affordable cost. As such, this project and its relatively low cost will not result in any significant, adverse impacts with respect to minority or low-income populations.

G. Proposed Project Schedule

Lancaster currently expects the construction of its Department of Transportation's storm water improvements project to begin in January 2010 and take about 250 calendar days (roughly nine months) to complete, including final site restoration. Under this schedule, the city expects that this project will be completed by September 2010.

H. Public Participation and Notice

During the planning for this project, Lancaster advertised its public hearing for this and other potential projects proposed for ARRA and WPCLF funding on two occasions. The legal notice first appeared in the *Lancaster Eagle-Gazette* on May 22, 2009, and then again on June 5, 2009. According to the city, a letter about the public hearing and a project fact sheet were also sent to about 200 potentially interested parties on June 8, 2009. A deadline of June 30, 2009 was set for public comments on the proposed projects.

At the June 22, 2009 public hearing, five members of the public were in attendance. They did not comment on the projects proposed for ARRA funding. Questions posed by city council members focused more on the ARRA program requirements and the local source of funds than on the project itself. In each case, the city's storm water coordinator addressed the concerns. After the public hearing, no additional comments or questions were received before the June 30th deadline.

Based on the prior notice and the subsequent public meeting the city held on June 22, 2009, Ohio EPA has determined that the city has provided the public with ample opportunity to review and comment on its proposal for ARRA and WPCLF financing of its Department of Transportation Stormwater Improvements project described in this document. Readers should also note that this hearing was held during a normal city council meeting, and was recorded for replaying on local television during the following week.

I. Interagency Coordination

The proposed project has been reviewed by the following agencies for technical input, or for conformance with legislation under their jurisdiction, and their findings support a LER:

Fairfield County Regional Planning Commission
Ohio Department of Natural Resources
Ohio EPA
Ohio Historic Preservation Office
United States Fish and Wildlife Service

J. Conclusion

The city's proposed project is sufficiently limited in scope and meets all applicable criteria to warrant a LER. The planning activities for the proposed project have identified no potentially significant adverse impacts. The proposed project is expected to have no short- or long-term adverse impacts on the quality of the human environment or on sensitive resources such as floodplains, wetlands, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, coastal areas, or threatened or endangered species. The improved operation of Lancaster's Department of Transportation facilities under its general storm water permit is the expected benefit of this proposed project, along with potential improvement in local surface water quality.

K. For further information, please contact:

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