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Jon Husted, Lt. Governor
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September 30, 2020

Limited Environmental Review and Finding of No Significant Impact

**Village of Continental – Putnam County
150,000 Gallon Elevated Tank
Loan number: FS390280-0007**

The attached Limited Environmental Review (LER) is for a replacement water tower project in Continental which the Ohio Environmental Protection Agency intends to finance through its Water Supply Revolving Loan Account (WSRLA) 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 WSRLA 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,

Jonathan Bernstein

Jonathan Bernstein, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: 150,000 Gallon Elevated Tank

Applicant: Village of Continental
100 North Main Street
Continental, Ohio 45831

Loan Number: FS390280-0007

Project Summary

The Village of Continental in northwestern Putnam County has requested financial assistance from Ohio EPA's Water Supply Revolving Loan Account (WSRLA) and the Ohio Public Works Commission (OPWC) to replace its existing elevated 100,000-gallon elevated water storage tank built in the late 1930s (see Figure 1) with a new 150,000-gallon elevated water storage tank and mixing system and appurtenances. All work on the replacement water tank project will be on land disturbed by previous construction and in an area generally lacking important environmental features, as shown in Figures 2 and 3, at an estimated construction cost of \$985,527.

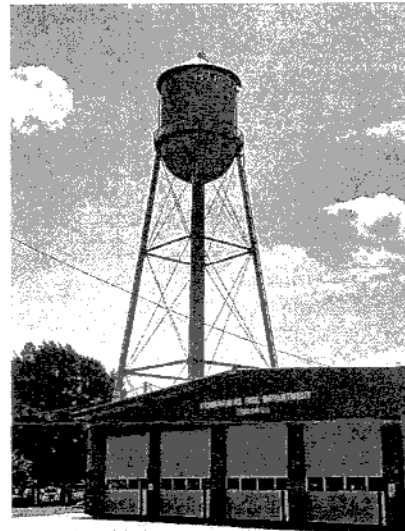
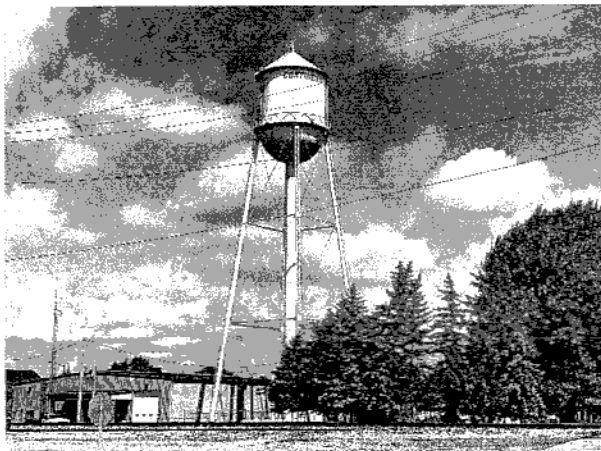


Figure 1. Existing Water Tank in Continental (July 27, 2020)

Based on the available information, it appears that the village will need to increase its existing water consumption charge from \$5.50 per 1,000 gallons to \$5.75 in 2021 to repay the WSRLA loan proposed to finance a portion of this project in Continental. An OPWC grant has been awarded to the village and is expected to make the needed improvements more affordable for an average residential customer living there.

History & Existing Conditions

Within the Village of Continental, potable water is provided to its residents through a public water supply or private wells. According to the village, the latter are only used by twelve residences and since they appear to be functioning adequately will not be discussed any further in this document. Rather, the focus of this document going forward will be the public water system serving roughly 465 residential and commercial customers in the village and the 5 residences outside Continental in the service area (see Figure 2 below).

The Village of Continental has identified its elevated water storage tank in downtown as having deteriorated to the extent that it needs to be completely replaced. This 100,000-gallon tank is located near the intersection of Oak Street and Main Street (see Figure 1 above).

According to village officials, the project's main purpose is to provide a new elevated water storage tank to meet the needs of its residents for at least the next twenty years and help ensure a potable water supply is available for the village's water customers. In particular, the village's project includes installing a mixing system in the replacement water tank to help control the amount of total trihalomethanes (TTHMs) in the village's finished water. TTHMs, among other concerns, are the basis for Ohio EPA issuing Director's Final Findings and Orders (DFFOs) against the village on January 30, 2014. The village's current status of being in violation of those orders stems mainly from not having constructed the improvements noted in plans prepared for Continental.

After 2014, the village completed a number of planning, design, and construction activities that resulted in partial compliance with the DFFOs. These efforts included such actions as a May 2015 three-part general plan consisting of water treatment plant (WTP) improvements, a mixer in its elevated tank, and implementation of a water distribution system optimization plan or DSOP; design of WTP improvements between 2016 and 2018; installation of a potassium permanganate feed system in 2018; and related review and approval of the proposed tank mixing system and elevated water tank between 2015 and 2019. Significantly, a special condition of the general plan approval in 2015 indicated that Continental was to evaluate and implement additional treatment system improvements if the three approved TTHM reduction options were not successful following construction. Additional work within the village's potable water treatment and distribution system service area, shown below in Figure 2, is expected to be needed to address the naturally occurring bromite levels in the source of ground water for Continental, as well as the operational and capital improvement needs indicated in the DSOP during 2020 and beyond.

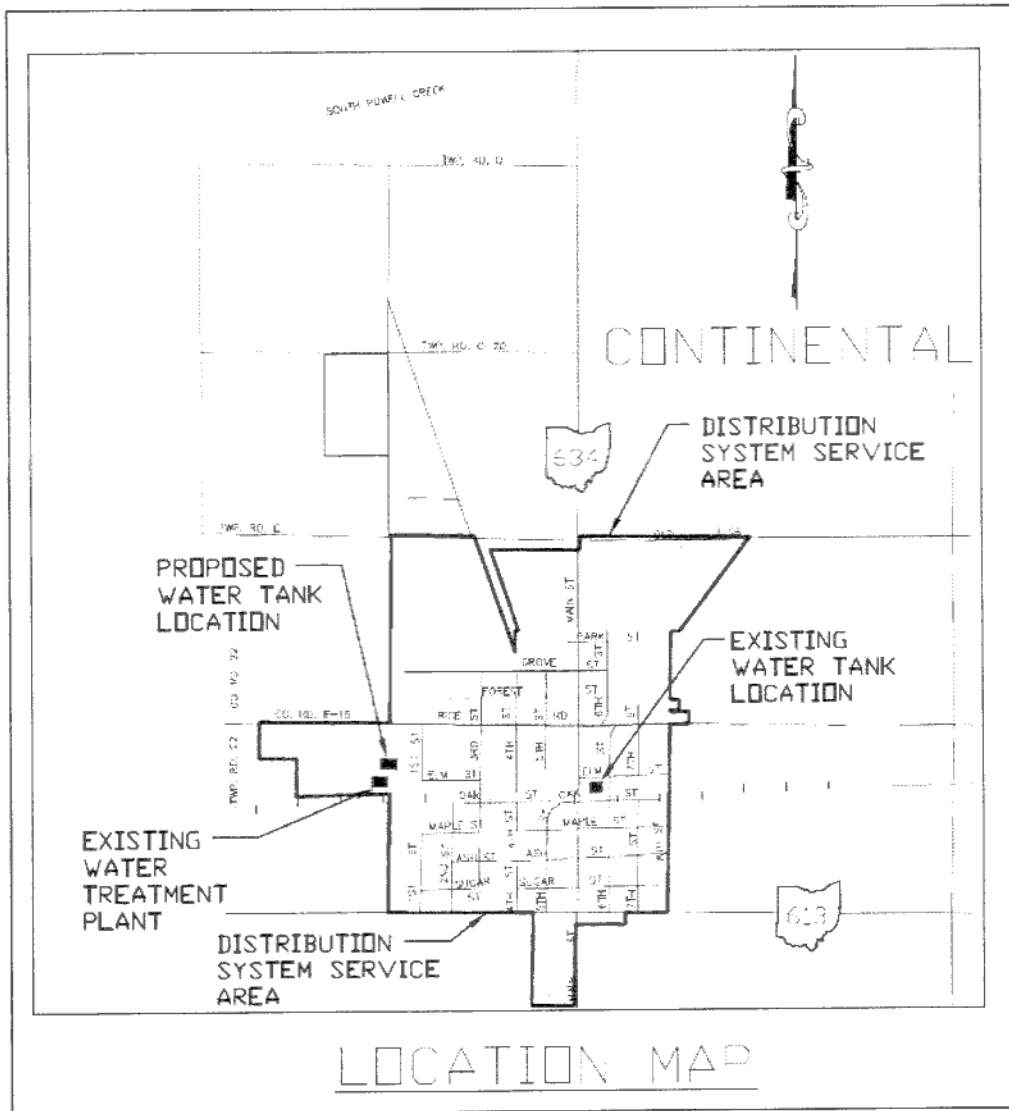


Figure 2. Village of Continental and its Water Infrastructure

Following the December 2016 interior and exterior tank inspection and resulting report, the village and its engineering consultant prepared a general plan on February 28, 2017, which forms the basis for the proposed improvements described in more detail below. Other than initially considering improvements to its existing 100,000-gallon elevated water tank, Continental did not evaluate other options or locations than the one adjacent to its WTP shown in Figure 2. A no-action option would not address the village's water system needs and Ohio EPA's DFFOs, and so was excluded from any consideration during the planning for this proposed project.

Project Description

After determining that a no-action alternative would not address the problems with its above-ground water storage tank built circa 1938, the village decided that it needs to completely replace it. The proposed project is expected to include the following: construction of a 150,000-gallon elevated

water tank and a concrete foundation, a submersible mixer inside the new tank, an eight-inch diameter water line and valves, controls and instrumentation, painting and disinfection, electrical systems, testing and inspection, a security fence, and an asphalt access road. The existing tank's demolition will follow once the new tank is operating and the restoration work is done. Figure 3 below shows the general location of the proposed project in relation to the village's WTP.

Earth-disturbing activity for this project is anticipated to be minimal, about 0.2 acres surrounding the base of the proposed replacement water tank, and mainly a result of soil conditions that could complicate laying the foundation for the replacement water tank. On this basis, about 235 cubic yards of soil is estimated at being generated during the construction site's excavation. Some of that material will be used on-site as fill material, with the balance going to a village owned property formerly used for wastewater treatment on the north side of town for disposal. To the extent necessary, the contractor will be responsible for providing proper soil erosion control and pollution prevention measures during construction for protection of adjacent roads and lands as well as elevated tank encapsulation during demolition of the existing elevated tank in the downtown area of Continental to protect the public from possible lead paint residues.



Figure 3. Proposed Replacement Water Tank Site (To Northwest and South Respectively)

Implementation

Prior to receiving bids on the proposed project, the total estimated cost of the tank replacement project was \$1.1 million of which an estimated 65% (\$715,000) would come from a WSRLA loan and the remaining 35% (\$385,000) would come from the OPWC in the form of a previously secured grant not to exceed \$420,000. The village qualifies for a disadvantaged community interest rate (0% over no more than 30 years) loan from the WSRLA. Borrowing at 0% will save Continental approximately \$236,687 over the life of the loan compared to the current market rate of 1.98%.

Given the water rate increases previously enacted by Continental's village council and recently improved water usage reporting and billing resulting from new water meter installation, the village expects that the resulting revenues will cover the costs of its water systems. Accordingly, a 4.5% rate increase will take effect in 2021 to pay for part of this project.

Based on the water rates effective in September 2020, a typical, in-village residential customer using on average 5,000 gallons of water per month is expected to pay a fee of \$40.42 per month, or about \$485 a year in 2021. When expressed as a percentage of the village's latest median household income (MHI) of \$47,188, these annual fees are about 1.03% of the village's 2014-2018 MHI, and thus are

considered to be generally affordable for an average residential water customer of Continental. Given the financial information presented above, no significant adverse economic impacts on the local residential users of Continental's water systems are anticipated. Under the village's proposed project schedule, WSRLA funds are expected to be awarded in October 2020, so that construction can commence by the end of the year. The village estimates that construction will be completed by December 2021.

Public Participation

On the basis of the village's previously held council meetings that were open to the public in 2016, the mayor's conversations with affected property owners living near the proposed project site, and the project's limited scope, Ohio EPA has determined that no additional public review and comment on the proposed project is necessary. More specifically, all potentially interested parties, including two residents living within 200 feet of the proposed water tank project, have been given adequate opportunity to review and comment on this project and its costs. The public was initially informed and provided updates about this project through local newspaper articles covering village council meetings.

Ohio EPA will make a copy of this document available to the public on its web page (<https://epa.ohio.gov/defa/ofa#169638770-wsrla-documents-for-review-and-comment>) and will provide it upon request. A copy may also be posted in the village hall and on its web site (if available).

Conclusion

The proposed project meets the project type criteria for a Limited Environmental Review (LER); namely, it is an action in a community with a public water system that is for minor upgrading and/or minor expansion of existing wellfield, water treatment, storage, or distribution facilities. In this specific case, the proposed action involves replacement of Continental's only existing elevated storage tank. As all of the proposed improvements will be limited to previously disturbed locations, the proposed year-long construction period for this project in the village is expected to result in no short- or long-term adverse environmental impacts.

Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant adverse environmental impacts and will have no effect on high-value environmental resources. Given the proposed project's limited scope, placement within a previously disturbed location in close proximity to the village's WTP on the west side of Continental, and the absence of any notable above-ground natural features within the immediate project area, the proposed tank replacement project will not result in any adverse environmental impacts. This conclusion is validated by the reviews completed by Ohio EPA and federal, state, and other governmental agencies, and the specific provisions included in the contract documents to minimize construction-related impacts to the project area.

Will not require extensive impact mitigation unique to the assistance proposal. The proposed work to complete this project is straight-forward and does not require any extensive mitigation of environmental impacts, as all of the improvements will be made within previously disturbed locations adjacent to the WTP site, the existing water tank site, and the former village wastewater treatment plant (WWTP) site proposed to be used for spoil disposal. In that regard, minimal earth-

moving activity is expected to affect less than one acre of prior disturbed land for the foundation of the proposed tank and the resulting spoil disposal offsite, so that only routine environmental impact mitigation in the form of standard soil erosion and sedimentation controls, spill control, dust control, vehicle emission controls, and adherence to prohibited construction activities is necessary.

To address potential Ohio EPA concerns about disposal of excess material excavated during construction activities, the contractor will need to follow local floodplain permit requirements and assure that this material will be managed to avoid any significant adverse off-site impacts (such as from any placement of excavated material or other fill in floodplains, wetlands, or other sensitive areas not previously approved by Ohio EPA for that purpose).

Is cost-effective and not the subject of significant public interest. In comparison to a no-action option that would leave unaddressed the current concerns with the existing elevated storage tank in the village's distribution system, the proposed elevated water tank replacement improvements are more cost-effective. The village also indicated that no other construction sites were evaluated during the planning for the project and that upgrading the existing water tank in the downtown area was not feasible.

Moreover, constructing the proposed improvements in close proximity (within 200 feet) of a residential area adjacent to the village's WTP is noncontroversial because the activity will not adversely impact the environment, has been fully discussed with nearby residents who could be affected by the project, and the expected water rate increases needed to cover the project's costs appear to be affordable.

Will not create a new, or relocate an existing, discharge to surface or ground waters. It will also not create a new source of water withdrawals from either surface or ground waters, significantly increase the amount of water withdrawn from an existing water source, or substantially increase the volume of discharge or loading of pollutants from an existing source or from new facilities to receiving waters. The proposed project will not result in either new or relocated discharges to either surface or ground water on a permanent basis because this project does not involve discharges. Further, the village's WTP already has sufficient capacity without new or increased withdrawals of water to meet the projected future 50,000 gallons of demand from the industrial park located west of the village and adjacent to the Continental WTP should it arise. Overall, Continental's proposed project is not designed to facilitate future growth in or around the village, but rather to address current and future operational needs.

Because the village produces its own potable water from a nearby aquifer and treats it at its own WTP, overall water usage and flows from the village's WWTP discharging to South Powell Creek are expected to stay within the current limits of these facilities. For the foreseeable future, the village's water use is not expected to change or exceed 0.2 million gallons per day (MGD). On this basis, the proposed project will not result in any increase in the volume of discharge or the loading of pollutants through the village's WWTP to South Powell Creek, a tributary of the Maumee River, under its existing National Pollutant Discharge Elimination System (NPDES) permit.

Will not provide capacity to serve a population substantially greater than the existing population. The scope of the proposed elevated water tank project is in keeping with the prior established capacity of the village's WTP. As such, the work included in the proposed project will not expand the rated capacity of the village's overall water treatment system. This conclusion was reached because the proposed project consists primarily of addressing the DFFOs issued by Ohio EPA to the village to address TTHMs in the finished water distribution system, and the planning document

for the project documents a declining, if not stable population in Continental over the next 20 years within a fully developed community. For that reason, the proposed project will provide capacity to serve the existing and projected population and not spur unexpected future growth.

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:

Ohio Department of Natural Resources
Ohio EPA
State Historic Preservation Office
United States (U.S.) Fish and Wildlife Service

Finding of No Significant Impact

The proposed project is sufficiently limited in scope and meets all applicable criteria to warrant a LER. The planning activities for the proposed project identified no potentially significant, direct, indirect, or cumulative 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 air quality, surface water, floodplains, wetlands, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, or threatened or endangered species. Ohio EPA expects that the Village of Continental's proposed above-ground elevated water tank project will enable the village to continue to provide drinking water to its water customers, while also addressing the water pressure and quality concerns that prompted the village to initiate this proposed project.

Contact Information

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