



August 21, 2023

Limited Environmental Review and Finding of No Significant Impact

**Board of County Commissioners of Hamilton County, Ohio – Hamilton County
LMWWTP Standby Power
Loan number: CS391525-0162**

The attached Limited Environmental Review (LER) is for a wastewater treatment plant equipment improvements project in Cincinnati which the Ohio Environmental Protection Agency intends to finance through its Water Pollution Control Loan Fund (WPCLF) 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 WPCLF 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,

A handwritten signature in black ink that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: LMWWTP Standby Power

Applicant: Board of County Commissioners of Hamilton County, Ohio
138 East Court Street, Room 603
Cincinnati, Ohio 45202

Loan Number: CS391525-0162



Figure 1. Hamilton County

Project Summary

The Board of County Commissioners of Hamilton County, Ohio (Board) has requested funding from the Ohio Water Pollution Control Loan Fund (WPCLF) to finance the Little Miami Wastewater Treatment Plant (LMWWTP) Standby Power project. Work for this facilities improvement project will include improvements to the electrical system, replacement of the standby power generators, and construction of an electrical room.

This project will also act as a sponsor for the East Fork Lake Wetlands project under the Water Resource Restoration Sponsor Program (WRRSP). The WRRSP helps achieve Ohio's water quality goals by providing funds, through WPCLF sponsoring loans, to finance projects that protect or restore high quality water resources. This environmental review document covers only the LMWWTP Standby Power project. Information on the East Fork Lake Wetlands project can be found within its environmental review document. By sponsoring this WRRSP project, the Board is eligible for an up to 0.1 percent interest rate discount.

History & Existing Conditions

The Board, based in Hamilton County (Figure 1), is responsible for the Metropolitan Sewer District of Greater Cincinnati (MSDGC), also known as the Metropolitan Sewer District (MSD). MSD operates a number of different wastewater treatment plants (WWTPs) within the City of Cincinnati, including LMWWTP, which is MSD's second largest treatment plant. It services an area of approximately 86 square miles and an approximate population of 237,000.

The Board has a number of future projects planned for the LMWWTP, including flow meter renewal, asset management and plant pumping upgrades, electrical asset management, capacity upgrades, disinfection pump station improvements, and upgrades to the electrical utility capacity. This Standby Power project was determined to be a priority as it is necessary to upgrade the LMWWTP's electrical equipment for any future projects to take place.

Under the Standby Power project, a new electrical backbone will be constructed to replace the existing main plant medium-voltage switchgear located on the 4th floor of the Secondary Treatment building and the existing medium-voltage substation at the Four Mile pump station. Medium-voltage electrical distribution switchgear was installed as part of the LMWWTP Secondary

Treatment expansion in the mid 1970's to replace the original 1950's limited plant switches. This equipment has exceeded its useful life and is obsolete.

Project Description

The project consists of the following major elements:

1. Construction of a new electrical building for new plant incoming power
 - a. Includes building space for electrical improvements at the adjacent pump station (Four Mile pump station)
 - b. Includes building space for future feeder breakers
2. Replacement of the existing primary switchgear within the secondary treatment building
3. Improvements to the medium voltage electrical services within the Four Mile pump station



Figure 2. Little Miami WWTP

Implementation

The Board proposes to borrow \$13,300,000 from the Ohio WPCLF at an interest rate of 2.66%; WPCLF interest rates are set monthly and may change for a later loan award. In addition, the Board plans to sponsor a previously described WRRSP project. Funds for this project will be made

available by advancing a portion of the estimated amount to be repaid by the Board over the life of the sponsoring WPCLF loan. Assuming a 20-year loan, borrowing this amount in WPCLF dollars could save the Board approximately \$2,000,000 over the life of the loan compared to the current market rate of 3.91%.

The average annual sewer bill for residents served by the Board is \$597. This is 1.4% of the median household income (MHI: \$42,663) and compares favorably to the Ohio average annual sewer bill, \$749. Construction began in December 2022 and will be completed in 26 months.

Public Participation

The Board has had public hearings for the capital budget that included discussions for this project throughout 2021, with additional public meetings specifically for this project in 2022. Community feedback has included minimizing impacts to the nearby bike trail and farmer's market, which the Board has addressed. In March 2023, the Board mailed 146 residents, businesses, and other entities letters about potential construction disruptions and received no responses.

Ohio EPA is unaware of opposition to or controversy about the project. Ohio EPA will make a copy of this document available to the public on its webpage: <https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements> and will provide it on request to interested parties.

Conclusion

The proposed project meets the criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public wastewater treatment system, which involves the functional replacement of and improvements to existing electrical and mechanical equipment. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect, will require no specific impact mitigation, and will have no effect on high-value environmental resources because the construction will be taking place inside of an existing WWTP that has experienced previous excavation. There are no high-value environmental resources in this developed area.

Is cost effective and is not a controversial action because there is no viable alternative to replacing failing electrical and mechanical equipment within a WWTP. Ohio EPA is unaware of controversy about or opposition to this project.

Does not create a new, or relocate an existing, discharge to surface or ground waters, and 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 because this project merely upgrades existing equipment in the WWTP and has no other effect on the city sewer system. Service will not be extended in any way nor provide additional capacity.

Based upon Ohio EPA's review of the planning information and the materials presented in this Limited Environmental Review, we have concluded that there will be no significant adverse impacts from the proposed project as it relates to the environmental features discussed previously. This is because these features do not exist in the project area, the features exist but will not be adversely

affected, or the impacts will be temporary and mitigated. This project will ensure that the LMWWTP continues to operate efficiently and provide service to Cincinnati.

Contact Information

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