



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

**11/3/2016**  
**Limited Environmental Review and Finding of No Significant Impact**  
**Toledo IDEP Construction**  
**Lucas County**  
**WPCLF # CS390915-0112**

The attached Limited Environmental Review (LER) is for a wastewater treatment project in your area 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 document.

Loan award will 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 blue ink that reads "Jerry Rouch".

Jerry Rouch, Assistant Chief  
Division of Environmental and Financial Assistance  
Office of Financial Assistance

JR/DH

attachment

## LIMITED ENVIRONMENTAL REVIEW

### A. Project Identification

Project Name: Toledo IDEP Construction

WPCLF# CS390915-0112

Address: The Honorable Paula Hicks-Hudson, Mayor  
City of Toledo  
One Government Center  
Suite 2200  
Toledo, OH 43604

### B. History and Existing Conditions

The Toledo Waterways Initiative is a 20-year, multi project program to reduce or eliminate combined sewer overflows (CSO) in the City of Toledo in accordance with the City's approved CSO Long Term Control Plan. Several of these projects have included sewer separation.

WPCLF funding requires post-construction performance certification to confirm that sewers have adequate capacity for peak flows and all sanitary connections have been removed from storm sewers. Initial post-construction screening of the stormwater from the Lockwood Devilbiss and New York sewer separation areas revealed illicit sanitary connections in the now separated stormwater outfalls. A thorough investigation during autumn 2013 and early winter 2014 identified the locations with illicit connections.

### C. Project Description

This project involves elimination of identified illicit discharges at five work areas in the Lockwood Devilbiss and New York areas, shown in Figure 1, using these methods:

- Over/under lateral – Involves excavating the lateral, disconnecting it from the storm sewer, running it over or under the storm sewer, and connecting it to the adjacent sanitary sewer.
- Redirect manhole or catch basin – Involves re-directing cross-connected sanitary manholes to the appropriate nearby sewer.
- Internal plumbing and private sewer modifications – Involves re-routing internal building plumbing and external sewer pipes at larger commercial and industrial properties.
- Sewer lining – Involves addressing indirect connections, where sewage may leak

from the sanitary sewer and enter a nearby storm sewer, bay lining sanitary and storm sewers.

- New sanitary sewer – Involves placing new sanitary sewer where none exists or cannot be accessed by all properties.

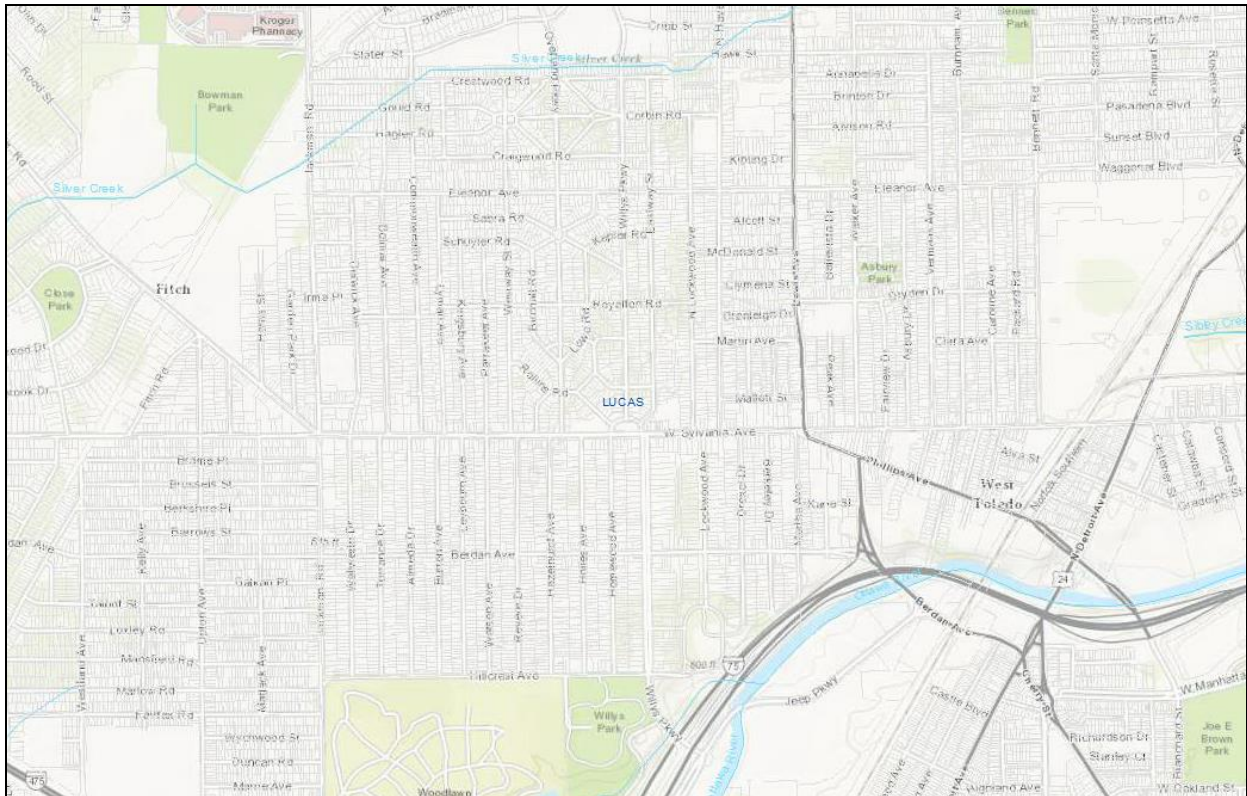


Figure 1. General Project Area

Upon removal of all illicit connections, the storm outfalls will be resampled for the presence of sanitary sewage. If sanitary sewage is still detected, additional sampling will be performed upstream to locate the source, similar to the sampling program performed as part of the project certification.

#### D. Estimated Project Costs

Toledo will borrow approximately \$1,645,865 from the Ohio Water Pollution Control Loan Fund (WPCLF) at the interest rate of 1.33%. During the 20-year loan period, Toledo will save approximately \$237,325 by using WPCLF dollars at this rate, compared to the market rate of 2.58%.

## E. Project Schedule

Assuming WPCLF loan award in December 2016, construction will begin in January 2017 and is expected to last three months.

## F. Public Notification

In November 2016, Toledo will hold an open house/meeting for residents impacted by this project. Beforehand, they will mail notices to residents to inform them about the project.

Information supporting the Limited Environmental Review (LER) is available from the project contact named below.

The Ohio EPA is posting this LER decision and Finding of No Significant Impact on the Division of Environmental and Financial Assistance web page: Ohio EPA will make a copy of this document available to the public on its web page <http://epa.ohio.gov/defa/ofa.aspx#169638769-wpclf-documents-for-review-and-comment> and will provide it to interested parties.

## G. Conclusion

The proposed IDEP project is minor upgrading and infiltration and inflow correction that qualifies for an LER and meets the following additional criteria for an LER:

*It has no significant environmental effect; it does not require extensive specific impact mitigation; and it has no effect on high value environmental resources* – All work is in paved roads in urban Toledo, an area generally lacking important environmental resources. Standard construction best management practices will minimize things like noise, dust, traffic disruption, and storm water runoff.

*It is cost effective and not controversial* - Generally, repair and rehabilitation of specific existing sewer lines is more cost effective than complete replacement. Debt for this project will be repaid from Toledo's sewer rates, which have been raised 9.5 percent per year to cover Toledo's costs. In 2016, Toledo residential sewer customers pay approximately \$616, which is approximately 1.9 percent of the annual median household income in Toledo of \$34,170. This is considered affordable.

Ohio EPA is unaware of controversy about or opposition to this project.

*It does not create a new, or relocate an existing, discharge to surface or ground waters; it 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; it will not provide capacity to serve a population substantially greater than the existing population* – This project will rehabilitate and improve existing sewer lines and will have no other

effect on the sanitary sewer system or sewage treatment 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 (surface waters, coastal zones, floodplains, wetlands, state-designated scenic or recreational rivers, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, threatened or endangered species, or state and federal wildlife areas).

For more information, please contact:

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