



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

January 21, 2022

**Preliminary Finding of No Significant Impact
To All Interested Citizens, Organizations, and Government Agencies**

**Harrison County
Freeport Sanitary Sewer System
Loan Number: CS390034-0012**

The attached Environmental Assessment (EA) is for a sanitary sewer construction project in Freeport 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 EA describes the project, its costs, and expected environmental benefits. We would appreciate receiving any comments you may have on the project. Making available this EA and seeking your comments 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. More information can be obtained by contacting the person named at the end of the attached EA.

Any comments on our preliminary determination should be sent to the email address of the contact named at the end of the EA. We will not act on this project for 30 calendar days from the date of this notice. In the absence of substantive comments during this period, our preliminary decision will become final. After that, Harrison County can then proceed with its application for the WPCLF loan.

Sincerely,

Kathleen Courtright

Kathleen Courtright, Assistant Chief
Division of Environmental & Financial Assistance

Attachment

ENVIRONMENTAL ASSESSMENT

Project Identification

Project: Freeport Sanitary Sewer System

Applicant: Board of Harrison County Commissioners
100 West Market Street
Cadiz, OH 43907

Loan Number: CS390034-0012



Figure 1. Harrison County

Project Summary

Harrison County (Figure 1) has requested funding from the Ohio Water Pollution Control Loan Fund (WPCLF) to finance the Freeport Sanitary Sewer System project. This project is intended to provide a new sewer system to the Village of Freeport to replace existing household sewage treatment systems (HSTS) and three package plants.

The proposed project would eliminate the discharge of raw sewage associated with unpermitted septic system connections, assist with bringing the Village of Freeport into compliance with the Ohio EPA's water quality effluent requirements, and provide system capacity to allow for growth.

History & Existing Conditions

The Village of Freeport is located in western Harrison County. Currently, it has no existing sanitary sewer collection system or centralized treatment facilities. Instead, wastewater is managed through individual septic systems and three limited-capacity package plants that serve the Steele Crest Apartments, Freeport Press, and the Freeport RV Park.

On December 8, 2016, Ohio EPA issued the Village of Freeport a Notice of Violation (NOV) for confirmed raw sewage contamination in the storm sewers as a result of failing septic systems and unpermitted connections. The storm sewers ultimately flow to Stillwater Creek, which has an aquatic life use of warmwater habitat. Ohio EPA testing has revealed the creek to likely be impaired by the sanitary sewage.

While the project service area is the corporation limits of the village, during the design process several properties within the limits were excluded from sanitary service due to distance (greater than 200 feet from the proposed sewers), and the cost of extending a sewer to include them being prohibitive. This decision was approved by both the Ohio EPA and the health department.

Population and Flow Projections

According to the U.S. Census Bureau 2014-2018 American Community Statistics, the population estimate for the Village of Freeport is 374. The project's 2020 Freeport Sanitary Improvements Preliminary Engineering Report completed by Hull and Associates, Inc. shows modest 3% growth per decade for Freeport from 2020 through 2050 for the purpose of sanitary sewer service planning.

This population projection puts the population of Freeport at roughly 397 persons in 2050. This yields a projection of 75,100 gallons per day (gpd) average wastewater flow and 342,100 gpd peak-hourly wastewater flow for the village. This projection was used in the design of the new sanitary sewer system and wastewater treatment plant.

Alternatives

Four feasible alternatives for wastewater treatment and two for collection were considered for this project. Because threats to human health and water quality from failing HSTS would continue and Freeport could face further legal action from Ohio EPA, doing nothing, the "no-action" alternative, is not feasible.

The feasible treatment alternatives seriously considered were the MBR package plant, the standard package plant, the below-grade SBR package plant, and the aerated lagoon with spray irrigation system. The other alternatives were eliminated due to high costs and/or unfeasible permitting requirements. Of these four remaining alternatives, the MBR package plant, the SBR package plant, and the aerated lagoon were ultimately rejected due to high costs and uncertainties surrounding ease of operation and reliability.

Two alternatives for the collection system were conventional gravity sewer and a low-pressure grinder pump system. The low-pressure grinder pump system was rejected due to higher operational costs and staffing needed. Ultimately, the varied terrain showed that a combination of conventional gravity and low-pressure sewers was most cost effective.

Selected Alternative

The selected alternative includes the construction of a 75,000-gallon-per-day extended aeration treatment plant and a conventional gravity sewer collection system with spans of low-pressure sewer dictated by local terrain in Freeport (Figure 2). The collection system will consist of approximately 9,410 linear feet (lf) of small-diameter pipe for low-pressure sewer, 850 lf of 4-inch PVC force main, 17,200 lf of 8-inch PVC sanitary sewer, 57 standard sanitary manholes, 8,160 lf of 6-inch service connection laterals that will connect to about 104 homes, 26 1-HP simplex grinder pumps; 13 residential electrical panel upgrades, one lift station, 7,700 square yards pavement repair, and site restoration.

This combination of wastewater treatment and collection system options was selected due to lower costs and relative ease of operation and reliability. A standard package plant like the one described here has been successfully installed nearby in Guernsey County, which provides opportunities for technical training for staff prior to start up and offers confidence that the system can reliably operate under local conditions.

The project will take place primarily in previously disturbed areas. The sanitary sewer collection system lines will be located along road rights-of-way within the Village of Freeport. The proposed wastewater treatment plant area consists of a vacant former railroad bed that has been severely disturbed by previous activities. Approximately 0.5 acres of land will be cleared in conjunction with the construction of said plant and its associated discharge pipe/outfall to Stillwater Creek, however no significant long-term impacts to terrestrial habitat are anticipated to occur. Additionally, all three existing package plants will be abandoned in place, and the users will be required to connect to the new system.

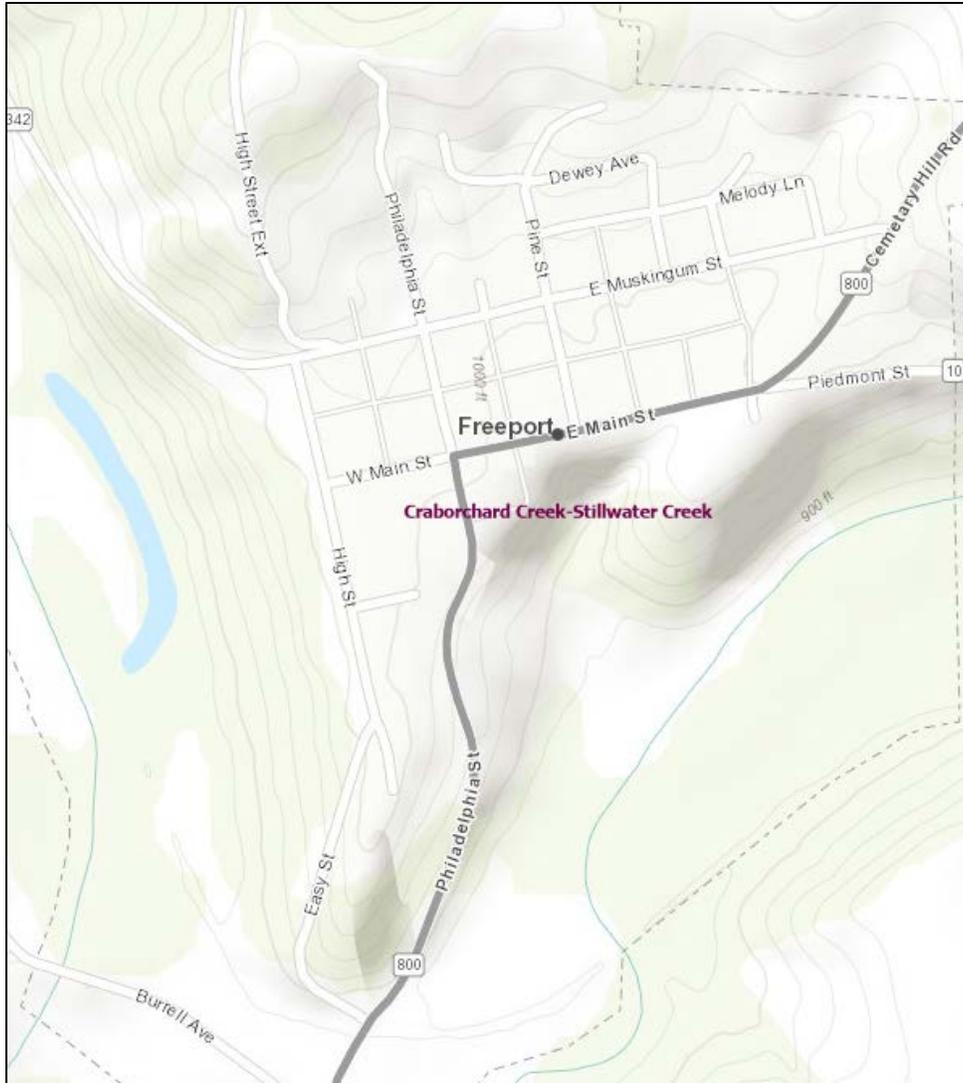


Figure 2. Aerial view of Freeport in Harrison County

Implementation

The estimated overall project cost is \$9,595,000. Harrison County's financing package includes \$3,700,000 from a state infrastructure grant, \$250,000 from the Ohio Water Development Authority (OWDA), \$750,000 from the Community Development Block Grant program (CDBG), and \$1,000,000 from the Army Corps Section 594 program. Harrison County is eligible to receive up to \$4,000,000 of WPCLF principal forgiveness, a loan that does not need to be repaid. Using WPCLF principal forgiveness, Harrison County could save approximately \$5,419,000 compared to the current market rate.

Construction will start upon award of the loan and will be completed in approximately 18 months.

Public Participation

This project has been developed with regular community communication and formally presented in two CDBG public meetings required for CDBG funding, held April 7 and April 14, 2021, at 6:00 PM at the Catholic church in Freeport. The primary comments from the attendees within these meetings pertained to the sewer bill and the few properties that are not going to be served by the sewer system. There will be a public notice period of 30 days associated with CDBG. The project requires easement from eight property owners, coordinated with direct communications.

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 web page (<https://epa.ohio.gov/wps/portal/gov/epa/divisions-and-offices/environmental-financial-assistance/announcements>) and will provide it on request to interested parties.

The following agencies reviewed this project's planning information:

Ohio Environmental Protection Agency
State Historic Preservation Office
Ohio Department of Natural Resources
U.S. Army Corps of Engineers
U.S. Fish and Wildlife Service

None of the review agencies opposes the project.

Environmental Impacts

This project could directly affect environmental features. Because the project is designed to provide sanitary sewers and centralized wastewater treatment in the Village of Freeport and provide no additional capacity in the proposed system for significant growth, the project is not expected to lead to new development or associated indirect or cumulative impacts.

Proposed construction of sewers and a new wastewater treatment plant (WWTP) will not alter major landforms because the sewer system will be underground and the WWTP will be built within a vacant former railroad bed that has been severely disturbed by previous activities.

Part of the proposed project is within the regulatory floodplain. Specifically, the sanitary sewers along Burrell Avenue and the discharge pipe/outfall structure associated with the WWTP would be located within the floodplain of Stillwater Creek. This area is described as Zone A, 1% annual chance flood hazard. The remaining project components would be located in an area of minimal flood hazard, which is described as Zone X. No above-ground buildings would be placed within the floodplain and underground infrastructure such as sewer lines are expected to have no adverse impact to the floodplain as they would be buried and result in no change in grade or elevation. A Flood Hazard Area Development Permit will be acquired by the village prior to construction activities.

The project area includes the surface water resource and aquatic habitat of Stillwater Creek. The proposed project would involve minor surface water impacts to Stillwater Creek for the construction of the discharge outfall structure associated with the WWTP. As designed, the outfall would be placed above the Ordinary High-Water Mark (OHWM) of Stillwater Creek; however, riprap would be placed below the OHWM in order to protect the area from erosion. In order to minimize impacts to aquatic species, no in-water work will occur within Stillwater Creek from April 15 to June 30. In addition, the project contract includes best management practices (BMPs) to prevent runoff and erosion downstream of construction areas.

A surface water delineation report completed in July 2020 identified 0.14 acres of one emergent wetland within the project area. This wetland consists of palustrine, emergent habitat and is considered a Category 1 wetland as evaluated under the Ohio Rapid Assessment Method for Wetlands (ORAM). Temporary impacts may include increased sedimentation during construction; however, temporary impacts are expected to be minimal due to the use of BMPs to minimize sediment entering the wetland area. Therefore, no long-term, adverse impacts to wetlands are expected.

No wild and scenic rivers or coastal zones are within the project area. Additionally, shallow excavation as necessary for project construction is unlikely to require dewatering that could affect ground water or the safety of drinking water. The Village of Freeport owns and operates their own public drinking water system.

No important terrestrial habitats are in the project area. Construction will occur primarily in previously disturbed areas, including road rights-of-way, meaning that no agricultural land will be affected. Construction activities require a limited amount of grass and vegetation removal; however, impacts to vegetation are expected to be minimal and temporary. Disturbed areas will be returned to pre-construction conditions upon completion of construction activities. Approximately 0.5 acre of land will be cleared for construction of the WWTP and associated discharge pipe/outfall. The majority of this area includes brush; however, limited tree clearing is required and will be limited to those that are necessary for the project and only occur between October 1st and March 31st to avoid impacts to federally threatened or endangered species of bats. Based on this information, the United States Fish and Wildlife Service stated in an email dated March 22, 2021, that the project may affect but is not likely to adversely affect the Indiana bat and northern long-eared bat. Only minor impacts to existing vegetation during construction are anticipated to occur. The only change in land use that will occur is within the abandoned railroad bed, which will be the site of the new WWTP.

The project area in Harrison County meets standards for the six regulated air pollutants (carbon monoxide, sulfur dioxide, nitrogen oxide, lead, particulate matter, and ozone). Neither construction nor operation of the proposed WWTP will add significant air pollutants. Contractors will ensure fugitive dust is minimized during construction by applying water or other environmentally benign dust suppressants. The local air pollution contribution by construction vehicles will be temporary

and similar to that of vehicles regularly transiting the construction area. For these reasons, the project should have no significant adverse short-term or long-term impacts on local air quality.

Construction noise will be locally audible and similar to that of farm equipment and other small machinery used in the local area. Construction will involve excavation in road rights-of-way. Temporary disruption to local traffic will be controlled by use of standard measures (barricades, detours, signs, barrels, flaggers) to ensure safety. Trenches will be covered or filled at the end of each workday to help protect public safety. After construction is complete and road surfaces replaced and lawns restored, local aesthetics will be little changed from pre-construction conditions. Septic odors that may have been evident for years will be eliminated. For these reasons, this project will result in no significant adverse short- or long-term impacts to noise, traffic, safety, odors, or aesthetics are expected due to this project.

After construction is complete, this project will require modest amounts of electricity to operate the grinder pumps and lift station and to operate the WWTP and will have no adverse effect on local or regional energy supplies.

The State Historic Preservation Office concurred with the review determination that this project will not cause a significant adverse effect to properties listed or eligible for listing in the National Register of Historic Places (cultural resources). In the event of archaeological finds during construction, Ohio Revised Code Section 149.53 requires contractors and subcontractors to notify the State Historic Preservation Office of any archaeological discoveries in the project area, and to cooperate with the Office in archaeological and historic surveys and salvage efforts when appropriate. Work will not resume until a survey of the find and a determination of its value and effect has been made, and Ohio EPA authorizes work to continue.

This project will have some impact on the local economy, stemming both from one-time costs and new monthly sewer bills. The Freeport sewer system will become part of the Harrison County Water & Sewer District (HCWSD) that owns and operates several wastewater utilities in other areas of the county. The Board of Harrison County Commissioners passed an ordinance establishing a bill of \$40 per month starting in June 2020 in order to generate revenue to repay the loan. The projected monthly sewer bill for residents is \$64. There will be a tap fee of \$1,500 for each household to hook up to the new system. The on-lot cost (demolition of the septic tank and construction of the lateral) will vary depending on the length of the lateral required to the home and quote received from contractors but should range between \$5,000 and \$7,000. Low to moderate income homeowners may have the cost of connection covered by CDBG-Residential Public Infrastructure Grant funds. The qualification process for this program will occur as the project nears substantial completion. There will be up to \$200,000 available for eligible homeowners.

Conclusion

Based on its review of this project's general plans and other information, Ohio EPA concludes that no significant short-term or long-term adverse direct environmental impacts will result from the project as related to the environmental features discussed in this Environmental Assessment. This is because these features do not exist in the project area, the features exist but will not be adversely affected, or the impacts of construction will be temporary and mitigated.

For these reasons, this project, alone or in combination with other projects, is not expected to result in any significant indirect or cumulative short-term or long-term adverse environmental impacts.

Ohio EPA expects the economic impact of the project on the average user to be insignificant because sewer rates are reasonable, and Harrison County received a favorable financing package.

The project will eliminate failing HSTS and associated risks to human health and aquatic life.

Contact information

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