Ohio Environmental Protection Agency

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

ENVIRONMENTAL ASSESSMENT AVAILABILITY NOTICE

The Ohio EPA, through the Water Pollution Control Loan Fund (WPCLF) program, is considering funding a project which is subject to environmental review requirements. Napoleon's proposed Williams Pump Station Improvements project consists of four components:

1. Abandon the existing Williams pump station and 450 lineal feet of sanitary sewer.
2. Reroute flows from the Oberhaus interceptor system to the Van Hyning interceptor system which has surplus capacity and thus can handle the existing and projected future flows from the 1100-acre project planning area.
3. Install approximately 2,080 lineal feet of new twelve-inch diameter gravity sewers, 460 lineal feet of new ten-inch diameter gravity sewers, a new 0.6 mgd capacity submersible pump station off Glenwood Avenue, 1800 lineal feet of six-inch force main, and 1,500 lineal feet of gravity sanitary sewer that will tie into an existing eighteen-inch diameter sanitary sewer located on Scott Street. Additional project improvements include manholes and a back-up power generator to serve the proposed pump station.
4. Directionally drill the section of sanitary sewer (force main and gravity sewer) needed to avoid directly impacting the wetland found along the chosen alignment as much as possible. Only 1,300 square feet (0.03 acres) of the 14-acre wetland will be permanently displaced, and 0.2 acres will be temporarily disturbed during construction and restored as part of the project.

Construction of the proposed project is estimated to take a little over a year with the total project cost being an estimated $1.6 million. This project is expected to replace the failing Williams pump station and force main with a new pump station located east of Glenwood Avenue designed to handle sanitary flows from the 1100-acre planning area, including 270 additional homes in the first 20 years. The terms of the city's loan are expected to be a 1% hardship interest rate and a loan repayment period of 20 years.

As Ohio EPA has issued a Draft Finding of No Significant Impact and an accompanying Environmental Assessment (EA) on this project, this notice is to advise the public that it will have a 30-day period in which to review the EA and provide comments to the Ohio EPA contact named at the end of the document. This public comment period began with the release of the EA to the public through posting of the document in the city's offices, on Ohio EPA's website, and mailing of the EA to interested residents who respond to this availability notice by providing Ohio EPA with their name and address. A copy of this notice will also appear on the city's web site.

If you would like to receive either an electronic (PDF) copy via e-mail or a paper copy via U.S. mail upon the EA's release, please contact Kevin Hinkle at either: kevin.hinkle@epa.ohio.gov, (614) 644-3712, or by sending a written request to:

Ohio EPA, Division of Environmental and Financial Assistance
ATTN: Kevin Hinkle
P.O. Box 1049
Columbus, Ohio 43216-1049

In addition to distributing the EA to interested parties, Ohio EPA has posted the EA document at the following website: http://www.epa.ohio.gov/defa/ofa.aspx. Once there, please scroll down to the "Documents Available for Review and Comment" heading at the bottom of the linked page. Then, please click on the "WPCLF Documents for Review and Comment" heading to see a list of documents available for downloading. A copy of Napoleon's Williams Pump Station Improvements Project EA has been posted there.

Ohio Environmental Protection Agency

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April 4, 2019

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

City of Napoleon – Henry County
Williams Pump Station Improvements
CS390645-0015

The attached Environmental Assessment (EA) is for a wastewater infrastructure improvement project in the vicinity of Napoleon 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 impacts. 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, as stated in the Ohio Administrative Code (OAC) 3745-150-06.

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 me at the letterhead address. We will not act on this project for 30 calendar days from the date of this notice to receive and consider comments. In the absence of substantive comments during this period, our preliminary decision will become final. After that, the City of Napoleon can then proceed with its application for a WPCLF loan.

Sincerely,

for Jerry Rouch, Chief
Division of Environmental & Financial Assistance

Attachment

50 West Town Street • Suite 700 • P.O. Box 1049 • Columbus, OH 43216-1049
epa.ohio.gov • (614) 644-3020 • (614) 644-3184 (fax)

ENVIRONMENTAL ASSESSMENT

Project Identification

Name: City of Napoleon, Williams Pump Station Improvements

Applicant: Joel L. Mazur, City Manager
255 West Riverview Avenue
Post Office Box 151
Napoleon, Ohio 43545

Loan Number: CS390645-0015

Project Summary

The City of Napoleon has nominated the above referenced wastewater improvements project for Water Pollution Control Loan Fund (WPCLF) financing through Ohio EPA's Division of Environmental and Financial Assistance (DEFA). Currently, the city utilizes a combined storm and sanitary sewer system to convey wastewater collected from city homes and businesses to its wastewater treatment plant (WWTP) located along the Maumee River. This combined system in downtown Napoleon discharges untreated wastewater and storm water to the Maumee River under wet-weather conditions through several outfall structures. These discharges pose a potential human health risk to city residents and are the subject of Ohio EPA Director's Final Findings and Orders issued on July 25, 2000. To address one of the problems facing its sanitary sewer system specified in its WWTP National Pollutant Discharge Elimination System (NPDES) permit's compliance schedule, the city is proposing to construct its Williams Pump Station Improvements project.

The main goal of this proposed project is to continue to improve the reliability of Napoleon's collection system and ability to convey peak wet-weather flows. More specifically, its purpose is to improve the functioning of the collection system and to increase sanitary sewer capacity in the northern part of the city and adjacent areas shown in Figure 1. This objective, including providing capacity for future development, will be accomplished mainly by replacing the existing over forty-year old Williams pump station with a new submersible wastewater pump station on city-owned property on the north side of U.S. Route 24 and just east of Glenwood Avenue, and installing a force main/gravity sewer between Grenwich Drive and Scott Street. Upon completion of the new facilities, the Williams pump station will be removed, and the site restored. As with the city's other compliance schedule driven wastewater projects, the Wiliiams Pump Station Improvements project is consistent with the regional water quality management plan for this part of Ohio. Construction of the proposed project is expected to require about thirteen months.

Based on the most recent estimates, the construction of this project is expected to cost about $1.5 million with the total project cost estimated at $1.6 million. Of this total project cost, the city qualifies for an Ohio EPA, 20-year, 1.00% hardship interest-rate WPCLF loan for construction of this proposed project. The city expects to repay its anticipated WPCLF construction loan with revenues collected from its wastewater customers in the form of sanitary sewer service charges. Please see the "Selected Alternative," "Project Implementation," and the "Local Economy" sections of this document for more information on the project's costs. More details on the planning, design, and construction components of the NPDES permit schedule of compliance can be found below in the "System History and Existing Conditions" part of this document.

Overall, the environmental review of this proposed project conducted by Ohio EPA described in this document indicates that the proposed project will not result in significant, adverse, direct or indirect environmental or socioeconomic impacts. More specific information on the project's potential environmental impacts and mitigation, and the city's public participation activities can be found below.

System History and Existing Conditions

Napoleon's combined sewer system has connections between the sanitary and storm sewers that otherwise function independently during dry weather. During and following rain storms, the amount of raw wastewater and storm water rises to the extent that these combined sewers discharge to the environment without adequate treatment through individual combined sewer overflow (CSO) points. This situation, as well as the city's sanitary sewer overflows (SSOs), can lead to water quality and potential human health concerns in the Maumee River downstream of Napoleon.

According to the city, Napoleon's combined sewer system has been known to experience overflows since the early 1970s. In the interim, the city has eliminated both CSOs and SSOs, but some persist. The city's Long-Term Control Plan (LTCP), first developed in December 2003 in response to Ohio EPA final findings and orders issued in July 2000, has identified where the five known CSOs and four known SSOs are and the steps needed to address them. Ohio EPA approved the city's LTCP in March 2007 and expected that the LTCP projects, including elimination of all SSOs would be completed in 20 years. Subsequently, the LTCP was amended in 2009.[1]

Put in their historical context, the city's sanitary and storm sewers were originally installed downtown in the early 1900s, or about fifty-eight years before the city built its first WWTP. Today, the city's wastewater collection system is ninety percent separate and ten percent combined, and 100 percent of the service area has sewers. More specifically, the wastewater collection system includes approximately 246,000 feet of combined and sanitary sewers ranging in size from four-inch diameter force mains to a 35" X 45" hand laid brick elliptical sewer. The pipes in the system are composed of vitrified clay, brick, concrete, cast iron and plastic. The pipes extend in age from newly installed to over 100 years old. Wastewater generated in Napoleon is collected by a combined collection system on the west and south sides of the city and a separated system in the north, central, and west sides of town.

Based upon information in the city's 2009 comprehensive plan, the city has 194,000 linear feet of wastewater lines. Approximately 37.8% of these lines were rated in excellent or good condition by the city engineer. The remaining 62.2% of 194,000 linear feet were rated in fair or poor condition. Of the eight existing wastewater pump stations, six were rated excellent or good condition, with the remaining two rated in fair or poor condition. The Williams pump station is one of these two poorly rated facilities. Napoleon's stormwater collection system consists of 89,000 linear feet of stormwater lines, of which 58.4% were rated in fair or poor condition. The remaining 37,000 linear feet are rated by the Engineer's office to be in excellent or good condition. The flows collected by the city's combined and separate sewer systems are treated at the city's 2.5 million gallons per day (mgd) average daily flow wastewater treatment plant (WWTP). At present, the WWTP can continuously treat 4.5 mgd and has an instantaneous peak hydraulic capacity of 7.5 mgd.

More information on the development of this proposed project can be found in the project planning and feasible alternatives section of this document. According to Ohio EPA's 2006 State Water Quality Management Plan, the City of Upper Napoleon does not have a designated facilities planning area in Henry County. However, the city defined a planning boundary for this project based on areas it currently serves with sanitary sewers (see Figure 1 below).

[1] As noted in the city's NPDES permit, the city's plan includes a 20-year, prioritized implementation schedule for the city to reduce the occurrence of CSOs to not more than four overflows in a typical year and the elimination of all SSOs. The plan consists of 34 separate projects which have overlapping project start and end dates. On December 13, 2013, Napoleon submitted a request for a 5-year extension to the final completion date for wet weather improvement projects. This five-year extension will be reflected in an updated schedule which will include a final end date for implementing wet weather improvement projects no later than December 31, 2030. Together with making future WWTP improvements, the chosen CSO LTCP and SSO elimination projects are expected to result in water quality improvements and human health benefits by reducing the number of CSO events and minimizing the discharge of untreated water pollutants from the collection system. By doing so, the city will continue to meet its permit requirements.

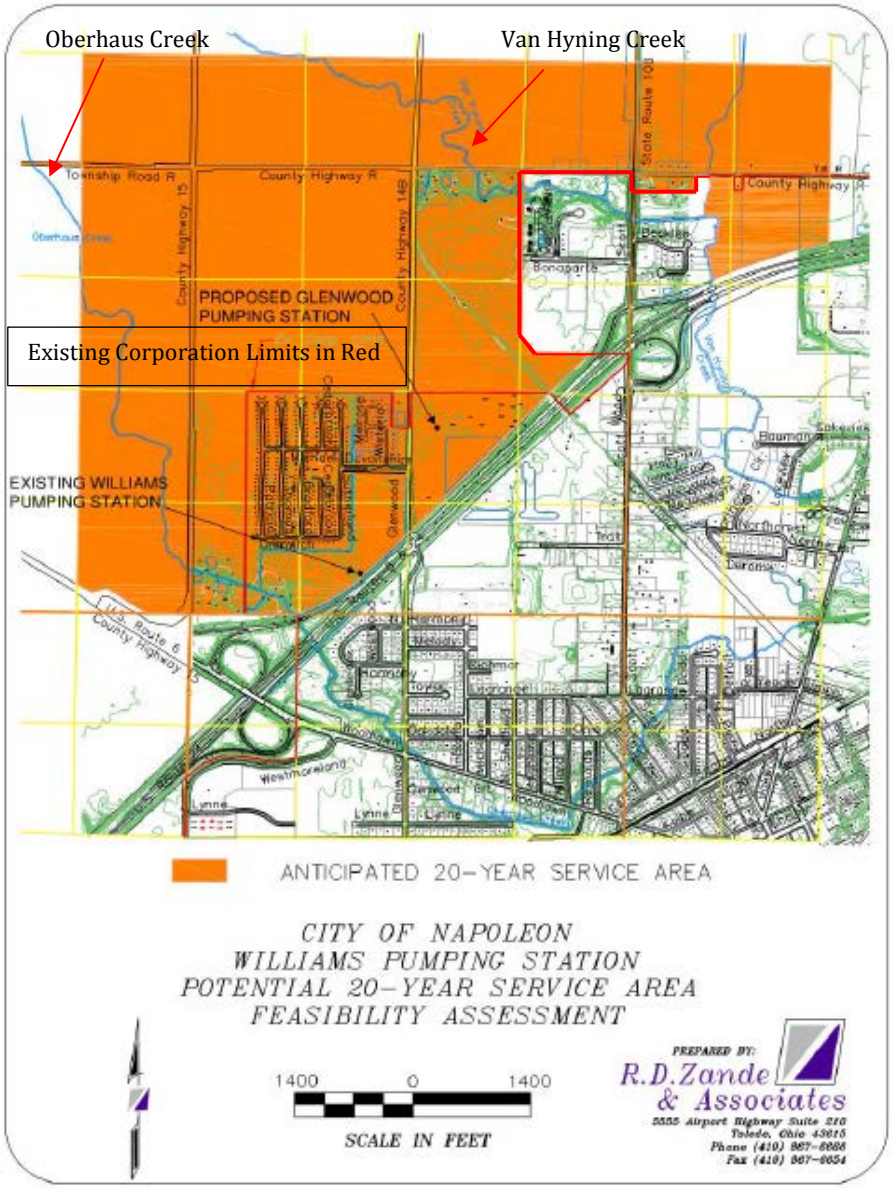

Figure 1, Planning Area Map for Williams Pump Station Improvements Project

This specific project involves replacement of the failing existing Williams pump station (see Figure 1 above) and its four-inch diameter force main with new wastewater infrastructure. Built in 1973 by a private developer and turned over to the city for operation and maintenance in the 1980s, the Williams pump station still uses its original pumps and controls. However, due to additional development in the project area shown above, the flow rates have increased in the past forty-five years and contributed to the problems at the oldest pump station in the city. The current estimates are that the Williams pump station serves about 950 people living in the Glenwood Estates manufactured housing complex and that peak residential flows are about 0.3 mgd. Below are photographs of the existing pump station:


Figure 2, Existing Williams Pump Station

Future System Needs

Given the type of proposed project and that its main purpose is to replace the failing existing Williams pump station and its force main, there would typically be a small residential population growth associated with it. However, as the proposed replacement pump station will operate at 0.6 mgd and have a peak capacity with two pumps operating at 0.8 mgd to allow for future expansion in the area, the proposed project has been designed with future population growth, service area expansion, and increases in sanitary flows in mind. Based on the proposed project providing between 500,000 and 670,000 gpd of unused sewer hydraulic capacity over the design-year usage (600,000 gpd), the proposed project could support development of between 135 and 850 acres of land on the north side of Napoleon (see Figure 1) out of an 1100-acre area.

Readers should also note that compliance with the city's NPDES permit will require the city to continue to make wet weather improvements to its combined storm and sanitary sewers over the next ten years. These projects, enforced through the compliance schedule in the city's NPDES permit, will focus on reducing CSO discharges from the collection system and eliminating the two SSOs located at Glenwood Avenue and Haley Avenue. Implementation of the Long-Term Control Plan is expected to be completed in 2029 and cost an additional $14.2M. The city has nominated as many as eight additional projects after this one to the WPCLF program to address LTCP needs.

Project Planning and Feasible Alternatives

Concurrent with the LTCP update prepared by the city's consultant, the city and its consultant prepared planning information for the proposed Williams Pump Station Improvements project. In this material, the city indicated that they had considered the following alternatives in its evaluation of options to address the problems at the Williams pump station:

No Action: The existing pump station and force main are nearing the end of their useful life and currently require extensive maintenance. The pumps have failed previously and are unable to accommodate future growth within the service area. On this basis, this alternative was not feasible and not considered further.

Replace Williams pump station (WPS) at Same Site: This alternative would not accommodate adequate flow for future expansion. The existing 4" diameter force main that is connected to the Oberhaus Interceptor and that runs under US Route 24 causes downstream surcharging in the interceptor during normal operation. The existing WPS site is located within an agricultural field and is relatively inaccessible during wet weather, increasing the risks to the customers during periods of failure.

Construct a New Regional Pumping Station (Preferred Alternative): This approach entails providing a new gravity sewer flowing to a new regional pumping station off Glenwood Avenue to increase capacity and redirect sanitary flow from the Oberhaus Interceptor to the Van Hyning Interceptor. During planning, a new Glenwood pump station was proposed to provide a rated capacity of 0.6 mgd with one pump operating and a peak capacity of 0.8 mgd with two pumps operating to allow for future expansion in the area. The proposed Glenwood pump station location will include standby power and improved accessibility to reduce the risk of failure. Gravity sewers will be installed at depths to allow future extension of the system as growth occurs. The proposed plan will extend sanitary sewer to undeveloped areas and allow for future utility access. The estimated total project cost for this option in 2019 was $1.5 million. The Van Hyning interceptor, Van Hyning pump station and Napoleon WWTP have capacity for the flows rerouted from the Oberhaus Interceptor which is near full capacity. During design, the city revised its plan to propose a smaller pump station with a design-year average daily flow capacity of 0.18 mgd and a peak hourly flow capacity of 0.60 mgd. The hydraulic capacity of the sewer is stated as 1.27 mgd. This design would allow for approximately 270 new homes to be built in the project area during the next 20 years and covering between 135 and 270 acres of land assuming one-half and one-acre zoning.

Selected Alternative

The city selected the preferred alternative (see third option above) for non-monetary and monetary reasons. Based on the analysis it completed, the city chose to construct the following improvements:

1. Abandon the existing Williams pump station and 450 lineal feet of sanitary sewer.
2. Reroute flows from the Oberhaus interceptor system to the Van Hyning interceptor system which has surplus capacity and thus can handle the existing and projected future flows from the area shown in the service area maps presented above.
3. Install approximately 2,080 lineal feet of new twelve-inch diameter gravity sewers, 460 lineal feet of new ten-inch diameter gravity sewers, a new 0.6 mgd capacity submersible pump station off Glenwood Avenue, 1800 lineal feet of six-inch force main, and 1,500 lineal feet of gravity sanitary sewer that will tie into an existing eighteen-inch diameter sanitary sewer located on Scott Street. Additional project improvements include manholes and a back-up power generator to serve the proposed pump station.
4. Directionally drill the section of sanitary sewer (force main and gravity sewer) needed to avoid directly impacting the wetland found along the chosen alignment as much as possible. Only 1,300 square feet (0.03 acres) of the 14-acre wetland will be permanently displaced, and 0.2 acres will be temporarily disturbed during construction and restored as part of the project.

Together, these improvements are expected to provide a twenty-year solution to the city's wastewater collection system needs in this part of Napoleon. Figure 3 below shows the location of the proposed project.

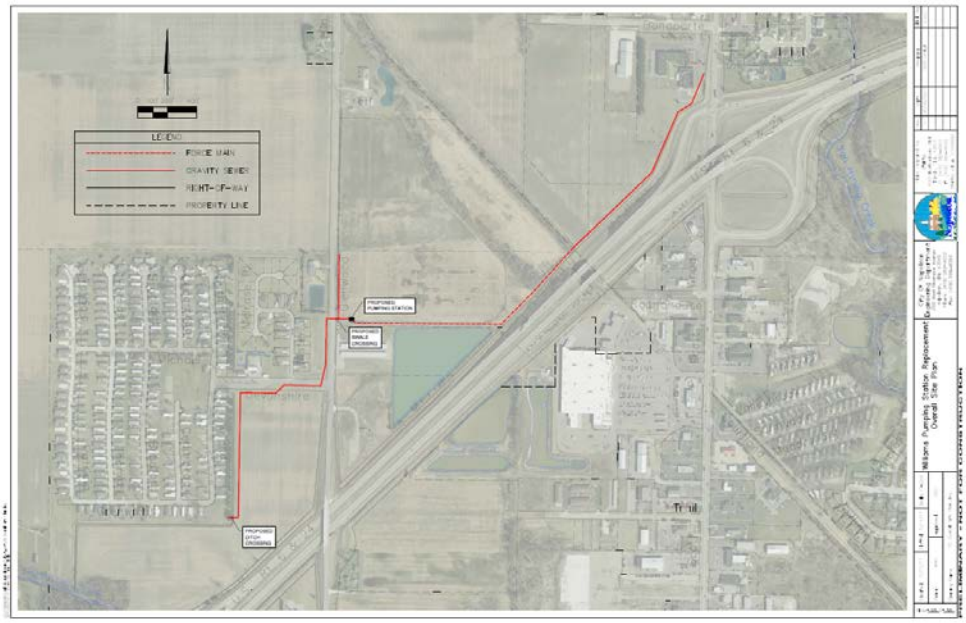

Figure 3, Selected Alternative Aerial Photo and Layout

Within the project area shown in Figure 3, Ohio EPA expects that the construction activities will generally be limited to a prior-disturbed landscape with the exception of an area of Category 1 wetlands located in the northeast portion of the project area (see Figure 4). The total amount of disturbance is expected to be 3.6 acres. Of this amount, much less than the total will be disturbed during the proposed construction activities. For example, approximately 13,500 square feet of land is expected to be needed for the proposed pump station, while trench excavations between 15 and 25 feet deep with twenty-five-foot wide temporary easements are expected to be needed for the new sanitary sewers. Trench boxes will be used to minimize the width of the excavations. Directional drilling will require three (3) bore pits approximately 40 feet long x 20 feet wide x 10 feet deep. The amount of fill needed for the pump station site (500 cubic yards) is expected to be more than the 340 cubic yards of soil which will be permanently displaced from the construction of the valve vault, wet well, and the gravity sewers and manholes throughout the project.

Figure 4, Project Area with Wetlands and Alignment

On the basis of the project scope shown in Figures 3 and 4, Ohio EPA anticipates that the impacts associated with the construction of this proposed project can be satisfactorily mitigated by the provisions in the contract documents. With the specific steps the city and its consultants have proposed to mitigate these possible impacts, Napoleon has shown that these concerns can be adequately addressed. For more information on the possible environmental impacts of each project and the means to mitigate them, please refer to the "Environmental Impacts" section of this document.

Implementation

The total project cost based on the engineer's estimate is $1,600,000, of which the city expects to borrow the entire amount except for the cost of the proposed water line improvements from the WPCLF at an interest rate of 1% payable over 20 years. This figure includes the cost of the design work ($95,750) previously financed by Ohio EPA through a WPCLF design loan. The estimated annual WPCLF debt service associated with this project after construction will be $88,500. WPCLF loan award is anticipated in May 2019. Construction is expected to be initiated in June 2019 and is expected to require thirteen months to complete, ending in June 2020 or earlier. The city has indicated that no sewer rate increases are needed to pay for this project as the amount of debt the city retired in 2018 (approximately $300,000) will offset the expected annual debt payments for it. As such, no impacts on residents from future rate structure are anticipated to occur.

The City of Napoleon last increased its sanitary sewer fees in 2018 in anticipation of meeting other critical wastewater infrastructure needs through other projects in its NPDES permit compliance schedule. The sewer utility rate increases approved by City Council will enable the city to make important investments in the wastewater collection and treatment systems over the next several years, while also keeping up with the impacts of inflation in the general operation of the system and meeting increased regulatory requirements. Currently, there are no planned increases in sewer rates in 2019. Given the city's ongoing discussions with Ohio EPA concerning the scope of its LTCP improvements over the next ten years, the actual rate increases expected to be needed to pay for these $14.2 million have yet to be determined.

A typical residential customer using on average 400 cubic feet per month is currently paying a fee of $59.75 per month, or about $717 per year. When expressed as a percentage of the city's latest median household income (MHI) figure of $46,786, these annual fees are about 1.53% of the city's 2013-2017 MHI.

Additional context for this proposed project's related economic impacts can be found in the following "Environmental Impacts" section of this document.

Environmental Impacts

The environmental review conducted in part by Ohio EPA and other review agencies, described herein, indicates that the proposed improvements within Napoleon's project area will not result in significant, adverse direct or indirect environmental impacts on the environmental features shown in Figures 1 through 4 above.

Mitigation has been proposed by the City of Napoleon and its engineering consultant to reduce the direct, indirect, and cumulative impacts that were identified by Ohio EPA during its planning review. More specifically, they include, at a minimum, appropriate provisions in the contract documents (detail plans and specifications) covering (1) prohibited construction activities, (2) erosion/sediment control, (3) water resources and habitat, (4) traffic control, (5) air pollution/noise control, (6) tree and vegetation protection, (7) dewatering, (8) spoil disposal sites, and (9) archaeological and historical resources. Specific information on each of these topics can be found within this section of this document. All potential spoil disposal sites and contractor laydown areas require prior review and approval by Ohio EPA to assure that no indirect,

adverse environmental impacts on sensitive natural features (e.g., wetlands, depressions, or floodplains) within the project area and vicinity shown on Figures 3 and 4 can occur.

Because the sanitary sewer alignments chosen for Napoleon's proposed project are linear and within a previously disturbed area, the amount of land that will be affected by construction (not to exceed 3.35 acres) is small, and the mitigation developed by the city's engineering consultant is appropriate, Ohio EPA expects the proposed wastewater improvements will not directly result in significant adverse effects on the natural or human environment.

The proposed pumping station will be located on city-owned property and the project alignment along the US-24 right-of-way was designed to minimize the disturbance of private properties during construction as much as possible. During design, a large wetland was observed on the City's property. Stantec and the City coordinated closely with the Ohio EPA and Army Corp of Engineers to assess the wetland and ensure minimal disturbance resulting from construction. Only 1,300 square feet (0.03 acres) of the 14-acre wetland will be permanently displaced, and 0.2 acres will be temporarily disturbed during construction and restored as part of the project.

The following natural features will not be affected, for the reasons given. The project is too small in scope to alter major landforms (i.e. plains, mountains, valleys, etc.), and regulatory floodplains are absent from the proposed sewer alignments. The project is generally not located in or near any coastal zones, national wildlife reserves, or state wildlife reserves. As a condition of project approval, disturbed areas will be graded to reflect original drainage patterns following completion of site work. Thus, pre-construction topography, including the 0.2 acres of wetlands temporarily impacted by construction activities will be restored and soils will be largely unaffected by this project.

Napoleon's Williams Pump Station Improvements project also was reviewed by Ohio EPA for indirect (secondary) impacts on the environment. Overall, Napoleon's proposed project is not expected to result in any significant, indirect adverse environmental impacts for the reasons cited below. This conclusion was reached mainly because of the lack of any significant natural resources in the project planning area (see Figures 3 and 4) that could be threatened by potential urban development, and Ohio EPA's expectation that this project will not adversely affect local land use patterns through increasing population, development, impervious surface area, and storm water runoff. Furthermore, because the proposed project is not intended to induce significant population growth, conversion of farmland to non-rural uses is not anticipated. Similarly, the socio-economic characteristics of the project area are not expected to be adversely affected. Where there is any potential for direct impacts on any resources in either the natural or human environment categories, Ohio EPA has summarized its review results below.

Topography, Grading Activities, and Soils

Current estimates are that 340 cubic yards of excess excavated material (soil) will be generated by this proposed project and will need to be transported via trucks from the sewer construction areas to the pump station location approved for this purpose. Given the proposed use of this prior disturbed site for this activity and the estimated amount of fill needed here (500 cubic yards), no significant direct, indirect, or cumulative impacts on significant environmental attributes are expected to occur during its disposal. Any remaining material will need to be placed in an environmentally sound location approved by Ohio EPA for this purpose to avoid impacts on any sensitive resources such as floodplains and wetlands. As all stockpile sites and contractor equipment laydown areas are required to meet applicable storm water pollution prevention plan requirements, no adverse impacts from this part of the project on topography and soils are expected. To conclude, no significant, direct, adverse impacts from site grading of area soils are expected to result from this proposed project.

Surface and Ground Water

Surface Water

The locations of the proposed improvements within the previously-disturbed project areas shown above, along with the avoidance of any open-cut crossings of streams and minimal wetland impacts during this project (0.23 acres), indicates that the city's proposed project should not result in any significant, adverse, direct environmental impacts on surface water resources, including the Maumee River, a state-designated scenic river, and its tributaries within the project area. Rather, the improved operation of the city's sanitary sewer system is expected to benefit the health of city residents and surface water quality in the project area, both in Napoleon and downstream of the project area.

In addition, standard mitigative measures (e.g., perimeter silt fences, storm water inlet protection, trench and excavation dewatering, and temporary and permanent seeding and mulching of bare soil areas) to address storm water runoff, erosion, and sedimentation impacts during the proposed nine month construction period, plus enforcing prohibited construction activities over this same timeframe, will help minimize the amount of sediment that directly enters catch basins, storm sewers, and streams in Napoleon's project area, where prior disturbance has already modified local site conditions. Important to the success of these measures is the requirement that the contractor install and maintain appropriate erosion and sedimentation controls in accordance with all applicable storm water pollution prevention and erosion control plans in the contract documents. Both the city and the contractor will be responsible for complying with the general storm water pollution prevention plan permit. Finally, as no significant increase in impervious surface area is expected following completion of construction and restoration, Ohio EPA expects that no adverse, direct impacts on water quality from this activity in the project area will result.

As a result of these provisions and aspects of the project area, Ohio EPA anticipates that no significant, adverse, direct impacts on surface water features will result from Napoleon's proposed project. For information on any indirect impacts on surface water features, please see the following section on terrestrial and aquatic habitat.

Based on the above information, there should be no significant, short-or long-term, direct or indirect, adverse impacts to surface water resources as a result of the construction of the city's proposed project, and there should be a net improvement in surface water conditions with a more reliable sanitary sewer system in the project area.

Ground Water

Ground Water Dewatering: Given the proximity of a fourteen-acre wetland and small streams to the project area, it is likely that ground water will be encountered during construction. As a result, temporary site dewatering during construction of the proposed project is expected to be necessary to provide dry work areas. To minimize adverse direct impacts from the discharge of pumped groundwater, such as the discharge of contaminated or sediment-laden water, or the discharge of water that is less than ambient temperature, all dewatering flows will be filtered before discharge to storm sewers or other stabilized sites. The project's construction wlll conform to all relevant parts of the contract documents such as erosion control, the Stormwater Pollution Prevention Plan, and any NPDES permit requirements. Any variations from this proposed dewatering plan may require additional review and approval by Ohio EPA. Once construction is completed in about one year, the dewatering activities will cease, and ground water levels are expected to return to their pre-construction levels.

Based on the above, the proposed project should not result in significant, short-or long-term, direct adverse environmental impacts to ground water quality or quantity. In addition to no direct effects on ground water,

the proposed project should also not indirectly affect any ground water resources through either related infrastructure improvements or property development.

Aquatic and Terrestrial Habitat

Aquatic Habitat

Based on the limited scope of the city's proposed project, the urban fringe area where the wastewater improvements will be made, and the alignment ultimately selected for the force main and gravity sanitary sewers, no direct, significant, adverse impacts on surface aquatic habitats (streams, floodplains, or wetlands) are expected to result. The main reason for this conclusion is that areas of aquatic habitat are absent from the bulk of the project area, and where they are present, mitigation has been proposed to address the potential impacts from land disturbing activities that could occur. Ohio EPA and the Ohio Department of Natural Resources (ODNR) consulted with each other and the city's consultant to develop an impact mitigation approach for the project area. While installing the proposed project with its permanent wetland impacts of 0.03 acres and temporary wetland impacts of 0.2 acres are an unavoidable aspect of the proposed project, the work is expected to require less than 3.58 acres of land total and 500 cubic feet of material for its installation. Based on prior coordination with the U.S. Army Corps of Engineers, the appropriate permits have been issued for the one wetland that will be affected by this project. The two other nearby wetlands will not.

Adherence to a storm water pollution prevention plan for this project is expected to assure that appropriately timed site restoration activities occur and that aquatic habitats experience no significant, short-or long-term, direct adverse environmental impacts. In addition, the proposed use of directional drilling to install the force main through most of the wetland and the specifications for implementing a frac-out contingency control plan (if the need arises) should assure that surface water features (streams, floodplains, or wetlands) and their aquatic habitats are not adversely affected by direct construction effects during the proposed construction period. Overall, a long-term benefit to aquatic habitats around the tributaries to the Maumee River and downstream is the expected outcome of this proposed project. In particular, trench grading and properly timed seeding of exposed areas within the linear alignments, excavated material, and spoil disposal sites should help reduce short or long-term, direct impacts on aquatic resources to insignificant levels.

Terrestrial Habitat

The most notable terrestrial habitat feature in the project area is the presence of individual street trees. As the city's consultant has indicated that tree removal will be limited to a few street trees, no significant, short- or long-term, direct (or indirect) adverse environmental impacts to the riparian area during this proposed project's construction are expected. The removal of these trees is a permanent and unavoidable aspect of this proposed project as the trees could interfere with the sanitary sewers in the future through root intrusion. However, when put in the context of the number of street trees in the city, the loss is not considered a significant, adverse impact.

In summary, on the basis of these findings for aquatic and terrestrial habitats, Ohio EPA has determined that Napoleon's proposed project will have no significant, direct, adverse environmental effects on any unique terrestrial or aquatic habitat features. Similarly, given the growth potential of the project area shown above in Figure 1-2, the potential for indirect and cumulative impacts is low.

Endangered Species Habitat

According to ODNR's Division of Natural Areas, ODNR's Division of Wildlife, and the U.S. Fish and Wildlife Service (US FWS), the project area does not include any known critical (suitable) habitat used by federally-listed endangered or threatened species, including the Indiana bat, Northern long-eared bat, and the bald

eagle found in Henry County. The same applies to the nine state-listed aquatic and terrestrial species noted by ODNR. In general, ODNR concluded during its reviews that the proposed project is not likely to have an impact on any of the state-listed animal species that historically have existed in the project area. Similarly, no plant species of any significance are known to now occupy the project area under review in this assessment. Accordingly, Ohio EPA has concluded that no significant adverse direct, indirect, or cumulative impacts on animals or plants are likely to occur in response to the proposed improvements on the basis of the sites selected for their construction.

Land Use (including Open Space) and Agriculture

Based on a review of this proposed project and the city's existing zoning for the project area, Ohio EPA has concluded that the project should have no significant direct, indirect, or cumulative adverse effects on either land use or agriculture production since no significant land use changes in this generally urban-fringe area are expected to occur during or in response to this activity.

Air Quality

Air pollution levels in the project area mirror those in Henry County as a whole. Since the entire county is in full attainment with air quality standards for all six major ("criteria") air pollutants, Ohio EPA has concluded that the city's proposed project will have no significant, adverse, direct, indirect, or cumulative impacts on air quality. This conclusion is supported by the air quality provisions in the detail plans and specifications. For example, given that the proposed project is expected to be completed over thirteen months in a residential and commercial area, residents are likely to encounter relatively minor increases in heavy truck traffic on a regular basis. Any increases they do encounter are expected to be temporary, however. With the mitigation proposed for dust control and proper tuning and maintenance of emission controls on heavy equipment, this relatively short-term increase in construction equipment activity should not result in any significant, adverse, short- or long-term impacts on air quality. In addition, use of dust control measures (such as water and calcium chloride) and prompt mulching, reseeding, and repaving of disturbed areas in reasonable sections should limit dust generation to relatively low levels, as well as minimize soil erosion and sedimentation of area waterways.

Ohio EPA supports the conclusion that this proposed project is consistent with the objectives of water quality planning under the Clean Water Act, and with the State of Ohio's State Implementation Plan under the Clean Air Act. These assurances also indicate that any projected future growth in the project planning area should not induce adverse indirect environmental impacts on air quality. A benefit of this proposed project will be the reduction of odors associated with the city's Williams pump station.

Noise, Traffic, Aesthetics, and Safety

The contract specifications and detail plans for Napoleon's proposed project provide adequate mitigation to address potential relatively short-term noise, traffic, and aesthetic concerns from truck traffic and other heavy equipment use. As a result of implementing control measures such as keeping construction equipment properly operating between 7:00 AM and 5:00 PM, preventing construction activity during evening and nighttime hours, and providing emergency access to the construction work areas at all times, no significant, direct project effects on noise, traffic, and aesthetic levels should occur. Noise levels and traffic patterns are expected to return to pre-construction levels once the city's proposed project is completed. By replacing the Williams pump station, Ohio EPA expects that Napoleon's proposed project will improve the overall aesthetics of the project area in the long-run. Finally, provisions have been included in the contract documents to protect workers' health and safety during the construction of this project. Compliance with the noise control provisions in the detail plans will help assure this.

The city's consultant estimates that the contractor will be able to utilize most, if not all, of the displaced soil for backfilling/final grading without the need to remove it from the construction project area. However, it is possible that up to 10 truckloads of soil (at 10-14 cubic yards per truck) could be removed from the site. In comparison to truck traffic on the nearby highway, this maximum amount of truck traffic is minimal.

Energy Use

Based on the planning information provided by Napoleon, construction of this proposed project is not expected to require a significant amount of non-renewable energy. As such, the planned thirteen-month construction period, with its energy use in the form of fuel consumption, is unavoidable if the wastewater needs of the project area are to be addressed. On this basis, no significant, short- or long-term adverse environmental impacts on energy use are expected to result from the construction activities involved in the city's project. Ohio EPA has drawn a similar conclusion about the long-term energy use required by the city's collection system, especially the Glenwood pump station replacing the Williams pump station. With less extraneous (storm water) flows entering the collection system upon project completion, non-renewable energy use is expected to be less than current usage, and not expected to result in any direct or indirect adverse environmental impacts.

To conclude, the operation of the proposed collection system improvements is not expected to have any significant short- or long-term adverse effects on the production and availability of non-renewable energy, or the air pollution energy production creates within this context. This conclusion was reached primarily because the energy demands from these new facilities are expected to be within the range of electrical energy already currently available.

Archaeological and Historic Resources

Ohio EPA's review found that this proposed project will not adversely affect archaeological and historic properties in the project area shown above. The primary basis for this conclusion is that the proposed sanitary sewer improvements are within previously disturbed locations. Accordingly, the potential to find any as-yet undiscovered, archaeological and historic resources listed in, nominated to, or eligible for the National Register of Historic Places within the project area appears low. Furthermore, all of the proposed work will take place away from buildings on the National Register of Historic Places, or designated by the State Historic Preservation Office as a historic structure. This absence of historic register eligible structures supports our conclusion of no effect.

Should any cultural resources appear during the project's construction, the detail plans include a provision for the contractor to stop work and coordinate with the appropriate authorities at the State Historic Preservation Office in Columbus. Ohio EPA concurs with this approach. On this basis, any direct or indirect impacts on these types of resources should not be adverse.

Local Economy

As documented earlier, and as part of the city's NPDES permit compliance schedule, the proposed project is related to addressing poor performance within the city's collection system, and not primarily to providing capacity for future growth. Also, as noted above, the long-term costs of this project and others the city is in the process of completing are not expected to have any significant, adverse effect on the local economy. This conclusion is based on the fact that the city has already scheduled sewer rate increases through 2019, that the resulting average fees ($717) are expected to be affordable for an average city resident as 1.53% of the city's MHI of $46,786, and that the city will save approximately $437,000 over 20 years by using the WPCLF instead of a 3.34% market rate loan. While Napoleon has been experiencing population declines over the past fifteen years, its median household income has increased slightly recently. In addition, residential and commercial development has been stagnant in recent years. Future sewer rate increases are expected to be

needed for projects needed within the city's combined sewer system and at its WWTP over the next twenty years. The actual increases will depend on the scope and timing of these projects.

Public Participation

As described in this document, the city's proposed collection system improvements project and its proposal to finance the project using WPCLF funds have been reviewed by the following agencies for technical input, or for conformance with legislation under their jurisdiction:

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

As no negative comments about the direct or indirect impacts of the proposed improvements were received from these review agencies, Ohio EPA has concluded that any potential concerns were addressed during project planning, as indicated in the environmental impacts section of this document.

In preparation for this proposed project and others still in the planning and design stages, the city completed public notification and involvement activities, including a dedicated meeting of the city's water, sewer, refuse, recycling, and litter committee held on the evening of September 10, 2018. Ten people were in attendance and mainly included city officials and staff. As part of the discussion, the city presented a fact sheet summarizing the project, including the provisions in the project for future development on the city's north side and outside city limits (a 475-foot section of sanitary sewer and 530 feet of water lines). The city also referenced a proposal to increase sewer rates by 5% in 2019. No comments were received from the public between the September committee meeting and when the meeting minutes were prepared on October 8, 2018.

On this basis, the city and its consultant have provided project planning area residents with ample opportunity to have their questions about this and related CSO long-term control plan projects answered during the public review and comment period. Accordingly, Ohio EPA has concluded that the public participation requirements of the WPCLF program have been met and that the city has appropriately involved the public in the decision-making process for its proposed collection system improvements project.

Conclusion - Reasons for a Preliminary Finding of No Significant Impact

Based upon our review of Napoleon's project planning information and the materials presented in this Environmental Assessment, Ohio EPA has concluded that there will be no significant adverse direct impacts from the city's proposed Williams pump station improvements project as it relates to the environmental features discussed previously. Through avoidance of the most environmentally-sensitive areas and the use of mitigative measures described in this document, the impacts from the project's construction should generally be relatively short-term and insignificant. Given the limited scope and purpose of the proposed project, no significant, adverse indirect or cumulative impacts are expected. On-going city initiatives to implement local zoning, comprehensive planning, and storm water controls, as well as enforcement of existing federal and state regulatory frameworks under the federal Clean Water Act, Endangered Species Act, and existing state law also should help assure that these objectives are met.

Project Benefits: The primary goals of this project are to replace the existing 40+ year old Williams Pumping Station that is in poor condition and to increase pumping capacity in the area north of US-24 to provide additional capacity for potential future growth in the areas to the north and west of the City. In addition, the removal of Glenwood Estates sanitary flows from the Oberhaus Interceptor will reduce sewer surcharging in areas along the Oberhaus Creek during heavy rainfalls. Overall, the city's proposed project will provide water quality benefits by improving the reliability and operation of the sanitary sewer system between U.S. Route 24 and Scott Street, and will address the compliance schedule in the city's NPDES permit.

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