June 3, 2024

Limited Environmental Review and Finding of No Significant Impact

City of Wellston – Jackson County
Water Treatment Plant Phase 1
Loan number: FS390969-0021

The attached Limited Environmental Review (LER) is for a water treatment plant project in Wellston 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,

Kathleen Courtright

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Water Treatment Plant Phase 1

Applicant: City of Wellston
203 East Broadway Street
Wellston, Ohio 45692

Loan Number: FS390969-0021

Figure 1. Jackson County

Project Summary

The City of Wellston, in Jackson County (Figure 1), has requested $8,255,000 from the Ohio Water Supply Revolving Loan Account (WSRLA) to fund the Water Treatment Plant Phase 1 project. This project involves improvements to their existing south well field to ensure that treatment capacity can easily be provided to the new water treatment plant (WTP) proposed in Phase 2.

History & Existing Conditions

The Wellston public water system (PWS) provides water service to 2,000 customers. The system consists of two aging treatment plants. The South WTP draws raw water from three wells (located near the fairgrounds and along Meadow Run Creek) and is estimated to have been constructed in the late 1960's. The North WTP pulls water from Raccoon Creek and is estimated to have been constructed in the 1940's. The original well field was installed in 1962 and several wells have been added over the years to provide adequate water to supply the city's growth. Additionally, the water distribution system, which includes two water storage tanks and two booster pump stations, is estimated to be over 70 years old.

The South WTP has an average daily demand of 1.7 million gallons per day (MGD) and an approved design capacity of 3.2 MGD. The total production rate of the existing wells that supplement the South WTP equals 3.24 MGD. The South well field receives its water source from an abandoned coal mine, which is a mixture of ground water and surface water. There are old strip mine lagoons located north of the well field that are connected to the well field through the underground mines. Both WTPs have become antiquated but have limited available space for expansion. The South WTP requires high chemical dosing operation due to undersized clarifiers, uses chlorine gas for disinfection, and the chemical feed system is operated manually. The North WTP also uses chlorine gas, has no means to isolate tanks and equipment for maintenance, and when maintenance is required, the whole plant is shut down. The sludge equipment is also not reliable.

The City needs to increase storage capacity and distribution loops within their system, as the existing treatment plants are aged and not structured to take on necessary distribution upgrades, and the existing storage tank has significant water loss and needs replaced. Phase 2 of this project entails building a new WTP that has the capacity and integrity to provide the water system demands and will replace the two existing treatment plants.

Project Description

Work for Phase 1 includes improving and replacing the existing clear wells at the South WTP to provide adequate onsite storage for transmission into the distribution system. Phase 1 also includes increasing the capacity of the three existing wells at the South well field and installing an additional well (#4). The existing well capacities will increase from 650 gallon per minute (GPM) to 750-800 GPM. These improvements are necessary to increase the capacity to suitable levels for accommodating 3.2 MGD with one well out of service due to the age of the existing wells. Two water distribution lines will be installed to connect the well field to the newly proposed WTP (Figure 2).

Additionally, a main line to transport water from the existing North WTP's intake structure to the lagoon that feeds the South well field will be installed to provide additional flow to the aquifer (Figure 3). The South WTP aquifer will experience an increased pull for the new WTP in Phase 2; therefore, feeding the aquifer indirectly from another water source like Lake Alma (located North of the North WTP that feeds into Racoon Creek) will help supplement the well field during times of drought or as needed from the additional water utilized. The aquifer can be fed by pumping flow from Lake Alma to the lagoons, which connect underground to the well field.

Implementation

The City of Wellston is eligible for $4 million in principle forgiveness (loan amount that does not need to be repaid) from the Ohio WSRLA. Wellston will borrow the remaining $4,255,000 from the Ohio WSRLA at the 0% disadvantaged community rate. With this favorable financing, Wellston will save $10,305,950 compared to financing the entire loan amount at the market rate, 4.18%, for a 30-year loan period.

The debt associated with this project will be recovered from user charges. Under the current ordinance, the fixed monthly rate per customer increased in 2023 and is planned to increase annually in the amount of 2.75 percent until 2025 or until amended. The 2023 average monthly residential water rate in Wellston was $70.39 ($845 annually). This is 1.9% of the median household income for Wellston (MHI; 44,875) and is higher than the Ohio average annual water bill of $477.

Loan award is anticipated in June 2024, and construction is expected to be completed during 2025.

Public Participation

Public participation plans have included presenting the project at the Wellston city council meetings. Meetings are open to the public and occur every first and third Thursday of the month. Council meetings are also recorded livestream and archived on Facebook. Additionally, council meeting minutes and legislation can be found on the city's Facebook page. Discussions were also held at the Water and Sewer Committee meetings, which are open to the public and often covered by the local newspaper reporters. Interviews with city officials and representatives are frequently aired on the local radio station, and it is anticipated that the WTP will be a topic of discussion in upcoming broadcasts. A separate public meeting about the proposed project was also held.

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

Conclusion

The proposed project meets the criteria for a Limited Environmental Review (LER); namely, it is an action within an existing PWS, which involves improvements to an existing well field. 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. Work will occur within the existing well field and previously cleared/disturbed areas, as well as within the road right-of-way. A Phase 1 archaeological survey and wetland delineation were completed within the proposed project areas. No archaeological or historical resources were discovered, nor were any wetlands discovered. Tree clearing will be expected along previously cleared areas due to the additional room required to install the water distribution line from the well field to the WTP (approximately 0.4 acres) and the raw water intake feed line from Lake Alma to the lagoons (approximately 25 trees). Wellston will only remove trees during the regular clearing dates of October 1st to March 31st to protect federally listed endangered and threatened bat species.

Construction will take place within the source water assessment and protection area for Wellston's PWS. The contractor will be required to implement all applicable best management practices for the protection of Wellston's drinking water source throughout the duration of construction and have a contingency plan prepared in the event of a spill or other emergency that could impact the drinking water source.

Although construction will occur within the floodplain, coordination with the floodplain administrator has determined there will be no impact with the completion of this project.

Otherwise, due to the nature and location of the proposed work, no adverse environmental impacts are expected.

Is cost effective. Wellston investigated several alternatives for addressing their aged WTPs including constructing a new WTP and rehabilitating the existing WTPs. After considering monetary and nonmonetary factors, Wellston determined it most cost effective to combine the two WTPs into one; therefore, updates to the existing well field are necessary to support the treatment capacity. By obtaining principal forgiveness through WSRLA funding, Wellston has reduced the cost substantially to minimize water bill rate increases for its customers specifically for this project.

Is not a controversial action. The nature of the project is such that there will be no significant adverse impacts to residents or the environment, and no opposition to the project has been reported.

Does not create a new, or relocate an existing discharge to surface or ground waters, does not create a new source of water withdrawals from either surface or ground waters, or 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, and w**ill not provide capacity to serve a population substantially greater than the existing population**. The new WTP will source raw water from Wellston's existing ground and surface water wells. The existing wells will increase in capacity, a new well will be installed and a main line to transport water from the existing North WTP's intake structure to the lagoon that feeds the south well field will be installed to provide additional flow to the aquifer. Wellston expects no significant population increase over the next twenty years.

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. The completion of Phase 1 will aid in having long-term benefits associated with the provision of safe and adequate water supply to support the needs of Wellston's water customers.

Contact Information

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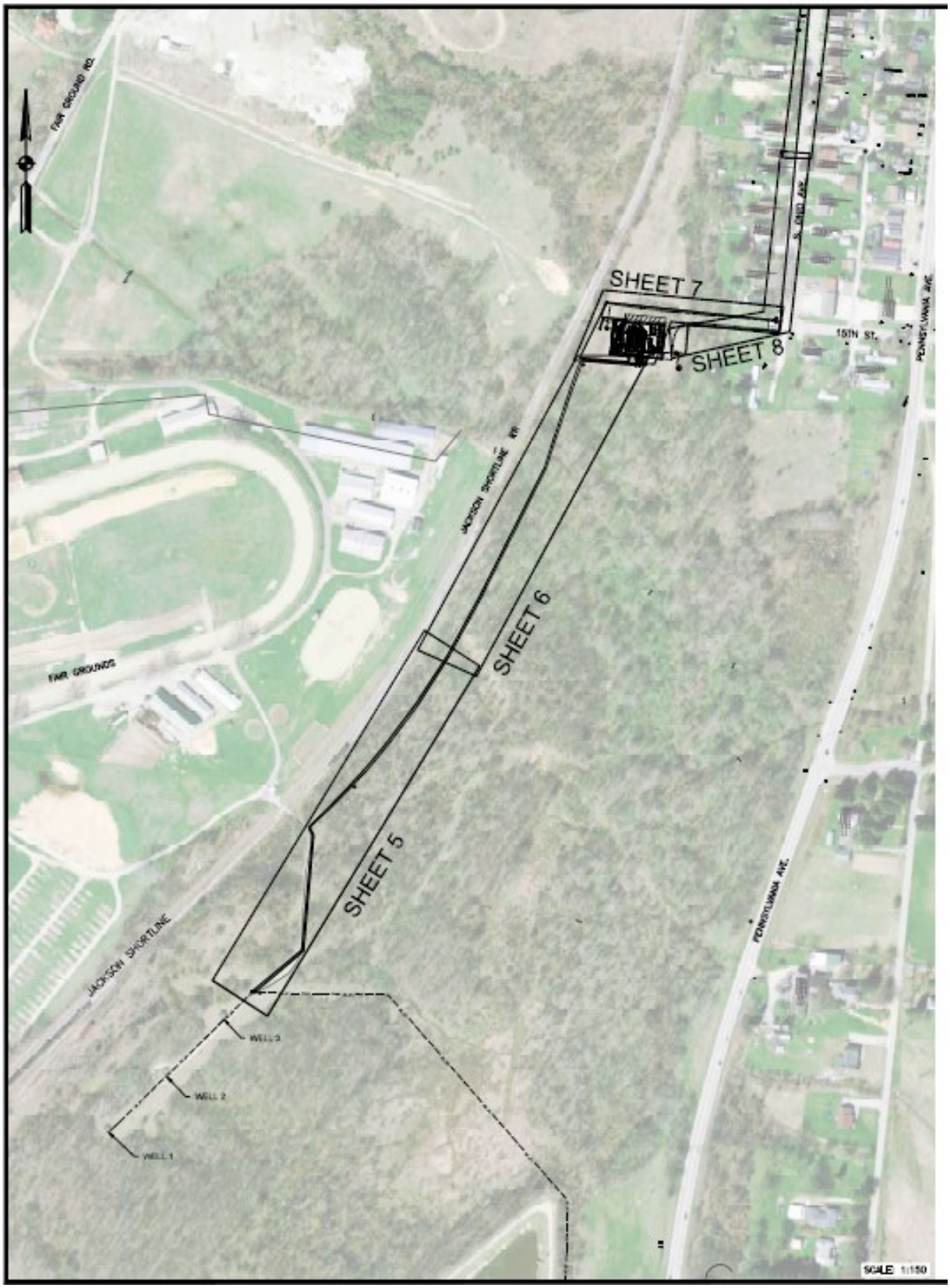

Figure 2. Location of the South well field and proposed water distribution lines.

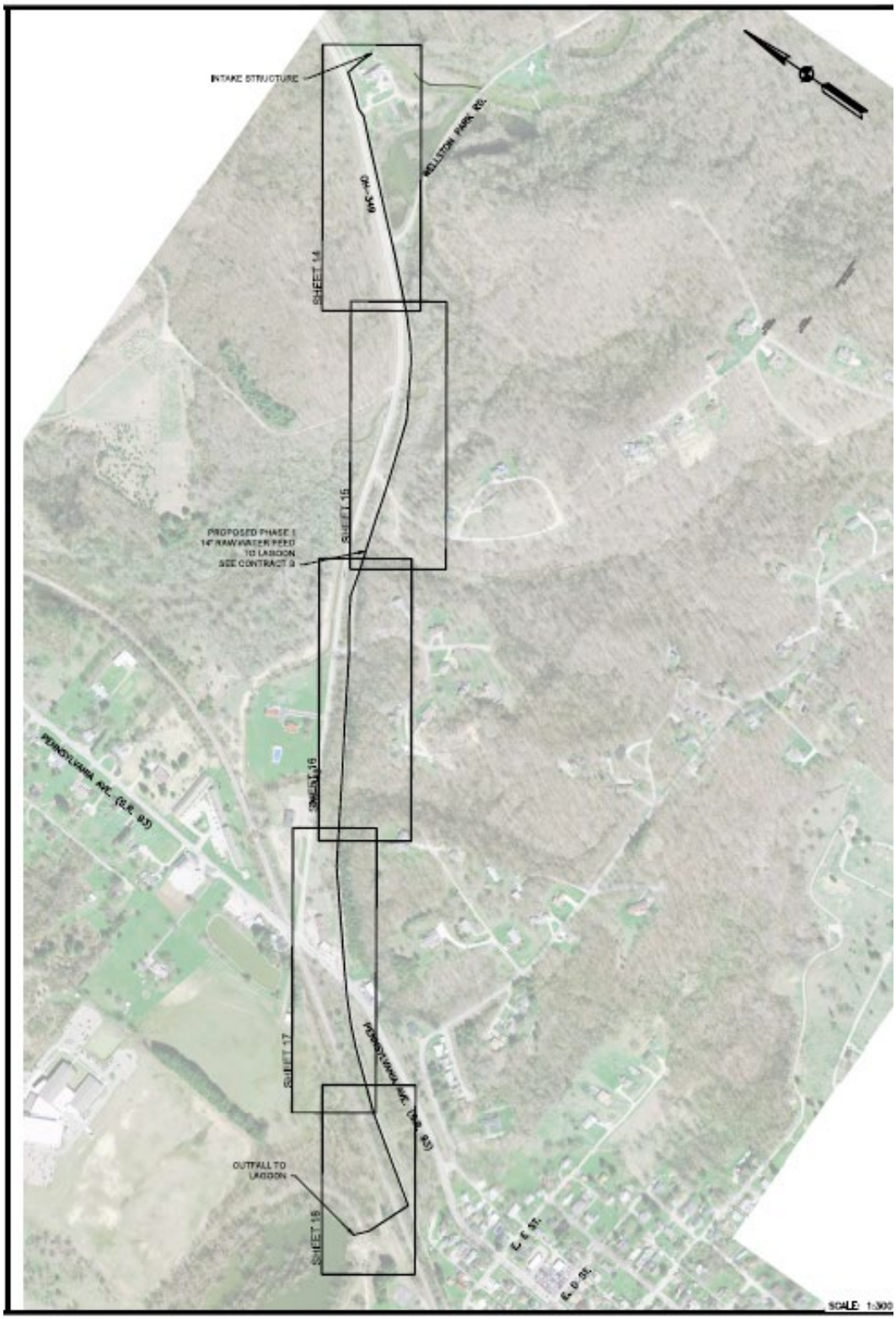

Figure 3. Location of the proposed raw water intake feed line and lagoon.