



July 2, 2024

Limited Environmental Review and Finding of No Significant Impact

**City of Painesville – Lake County
Anaerobic Digester Improvements
Loan number: CS390733-0012**

The attached Limited Environmental Review (LER) is for a wastewater treatment project in Lake County 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: Anaerobic Digester Improvements

Applicant: City of Painesville
7 Richmond Street
Painesville, Ohio 44077

Loan Number: CS390733-0012

Project Summary

The City of Painesville has applied for funding from Ohio EPA's Water Pollution Control Loan Fund (WPCLF) for the Anaerobic Digester Improvements project. The project is intended to improve existing infrastructure by installing a new digester mixing system and cover to ensure effective treatment and operation, allowing Painesville to maintain compliance with its National Pollutant Discharge Elimination System (NPDES) permit. The total estimated loan for the project is \$1.3 million, with construction scheduled to begin autumn 2024 and be completed in twelve months.

History & Existing Conditions

The City of Painesville Water Pollution Control Plant (WPCP) is owned and operated by the city and is located at 1170 North State Street. The WPCP was originally constructed in 1946, with the primary treatment plant placed into operation in 1958, and the chemical treatment facilities constructed in 1965. Significant improvements to the WPCP occurred in the 1970s and 1990s, with the most recent major WPCP construction and equipment upgrade occurring in 2009. The WPCP has a capacity to treat an average daily flow (ADF) of 6.0 million gallons per day (MGD) and a peak hydraulic flow of 28.0 MGD. The WPCP discharges to the Grand River. The city's collection system, first developed in 1887, includes approximately 55.5 miles of separate sanitary sewers which service an approximately 8-square-mile area.

Evaluations at the WPCP have shown that while Digester #2 was refurbished in 2005, Digester #1 requires improvements. Anaerobic digesters help to break down organic waste. Digester #1 has a floating cover that is in poor condition and is past its useful life. Additionally, the digester's mixing system is no longer efficient and needs replacement.

Project Description

The Anaerobic Digester Improvements project (see figures 1 and 2) will take place within the active facility of the Painesville WPCP, which includes above and below ground wastewater treatment structures, extensive prior excavation, buried utilities, concrete, gravel, and lawn grass, that otherwise supports no wetlands, forested areas, or aquatic habitat. Construction and installation include the following:

- New mixing system, electrical conduit, and cleaning
- New digester cover replacement
- New gas flare, piping, and flow meter

- Replacement of concrete stairs
- Restoration activities for all disturbed areas of concrete, gravel, and lawn grass

Implementation

The total estimated loan amount for the proposed project is \$1,304,000, all of which the City of Painesville proposes to borrow from the Ohio Water Pollution Control Loan Fund (WPCLF). The project qualifies for the standard WPCLF below-market interest rate on 30-year construction loans, which for July is 3.03% (WPCLF loan interest rates are set monthly, and the rate may change for this loan). Borrowing at 3.03% will save Painesville approximately \$347,000 over the life of the loan compared to the current market rate of 4.33%.

Painesville will recover debt associated with the project with revenue generated by monthly sewer fees. The 2024 monthly residential sewer rate in the project area is \$31.60 (\$379 annually). This is 0.79% of the median household income of \$47,976, as compared to the state average of 1.3%.

Public Participation

The City of Painesville has held various public meetings to notify residents and businesses about the project, bidding, bid opening, and contract award. A public notice announcing the availability of this Limited Environmental Review will be posted on City of Painesville and Ohio EPA Division of Environmental and Financial Assistance websites. Thus, there have been adequate opportunities for information dissemination and public participation.

Conclusion

The proposed project meets the criteria for a Limited Environmental Review; namely, it is an action within an existing public wastewater treatment system, which involves improvements to existing wastewater treatment infrastructure. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no adverse environmental effect, will require no specific impact mitigation, and will have no effect on high-value environmental resources, as there are no known sensitive environmental resources within the proposed project area. The proposed work will take place within the fenced area of the existing wastewater treatment facility, which includes wastewater treatment structures, extensive prior excavation, buried utilities, concrete, gravel, and lawn grass, that otherwise supports no wetlands, forested areas, or aquatic habitat. Mitigation measures include typical erosion control and construction best management practices.

Is cost effective, as the proposed action was evaluated as the most cost-effective alternative to improve the existing wastewater treatment infrastructure.

Is not a controversial action, as there is no known opposition to the proposed project and the cost of the project is not overly burdensome to ratepayers.

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 loading of pollutants from an existing source or from new facilities to receiving waters, since the project improvements to existing infrastructure to allow Painesville to maintain compliance with its NPDES permit and by ensuring effective wastewater treatment.

Will not provide capacity to serve a population substantially greater than the existing population, since the project is not related to serving new growth or increasing capacity at the wastewater treatment facilities.

In summary, 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 water, ground water, air quality, floodplains, wetlands, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, federal or state-designated wild, scenic or recreational rivers, federal or state-designated wildlife areas, or threatened or endangered species). Typical construction impacts, such as noise, dust, and exhaust fumes, will be short-term and addressed through the use of standard construction best management practices.

The proposed project is a cost-effective way to address necessary improvements within an existing wastewater treatment system. Once implemented, the project will help Painesville update its aged wastewater treatment infrastructure, ensuring effective treatment and operation, and protecting water quality in the Grand River and Lake Erie. Also, by using WPCLF low-interest financing, Painesville has minimized the project cost.

Contact information

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Figure 1: General project area

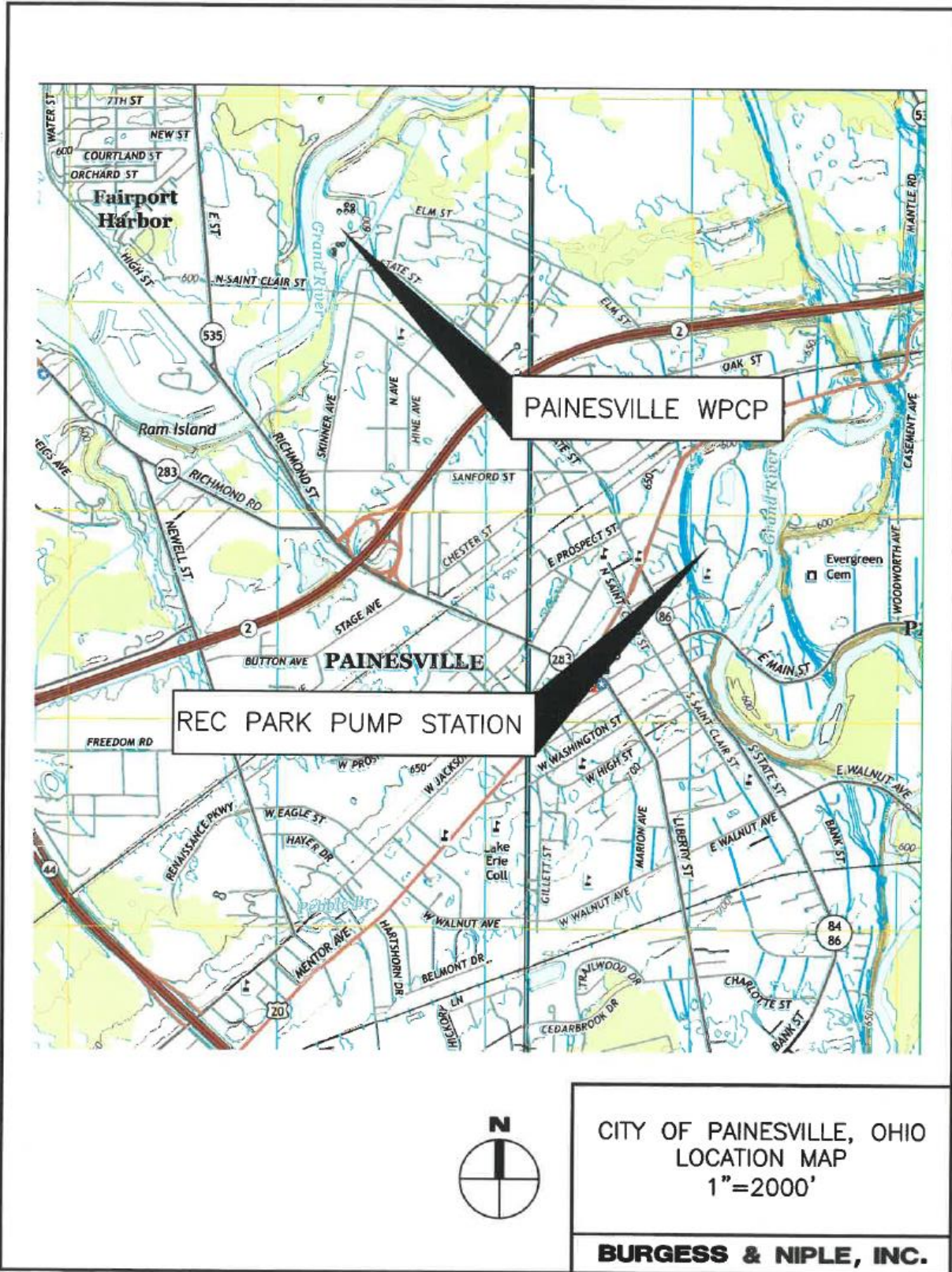


Figure 2: Specific project area