



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

December 8, 2022

Limited Environmental Review and Finding of No Significant Impact

**City of Lorain - Lorain County
Primary Digester Improvement
Loan number: CS390532-0034**

The attached Limited Environmental Review (LER) is for a wastewater treatment plant project in Lorain 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 cursive script that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Primary Digester Improvement

Applicant: City of Lorain
200 West Erie Avenue
Lorain, Ohio 44052

Loan Number: CS390532-0034



Figure 1. Lorain County

Project Summary

The City of Lorain has requested funding from the Ohio Water Pollution Control Loan Fund (WPCLF) to finance the Primary Digester Improvement project. This project is intended to upgrade and replace equipment within the Black River wastewater treatment plant (WWTP) in order to improve efficiency and performance.

History & Existing Conditions

The City of Lorain is located in Lorain County (Figure 1). The city owns and operates a wastewater collection and treatment system consisting of two major parts: a sanitary sewer collection system and two major WWTPs, the Black River WWTP and the Philip Q. Maiorana (PQM) WWTP.

The Black River WWTP is a conventional activated sludge treatment plant constructed in 1955 and last updated in 1995. This WWTP receives primarily domestic wastewater from the City of Lorain, the City of Sheffield Lake, parts of Elyria Township, and parts of Sheffield Township. The facility discharges into the Black River near Lake Erie. The collection system within the service area of the Black River WWTP is comprised of fully separated sewers and no combined sewers.

Within a WWTP, digesters are where bacteria break down the organic matter within the wastewater. After 50 years of service, many of the digester's main components within the Black River WWTP are failing and require replacement. Refurbishment of failing components was considered along with replacement. However, refurbishment was not found to be the best project alternative due to the age of the components, and the fact that many parts are no longer available.

Project Description

This project will entail replacing many of the digester's main components, including sludge heaters, digester gas equipment, sludge pumps, electrical components, sludge thickener, scum pump, mixers, HVAC systems, roof installation, and additional appurtenances. All of the equipment mentioned above is currently failing due to age. The project location is shown below in Figure 2.



Figure 2. Lorain’s Black River WWTP

Implementation

The City of Lorain proposes to borrow \$5,000,000 in Ohio WPCLF funding at the standard interest rate of 3.01%. Assuming a 20-year loan, borrowing at this rate could save Lorain approximately \$790,000 over the life of the loan compared to the current market rate of 4.26%. WPCLF interest rates are set monthly and may change for a later loan award.

No sewer rate increases are scheduled as a result of this project. A typical, in-city residential customer using on average 685 cubic feet per month can expect to pay a fee of \$56.39 per month, or about \$677 a year. When expressed as a percentage of the service area’s latest median household

income (MHI) figure of \$40,486, this annual fee is about 1.67% of the area's MHI and is considered generally affordable for an average residential wastewater customer of Lorain's Black River WWTP. Construction is scheduled to begin spring 2023 and to be completed in approximately 25 months.

Public Participation

This project has been discussed at city council meetings open to the public.

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/divisions-and-offices/environmental-financial-assistance/announcements> and will provide it on request to interested parties.

Conclusion

The proposed project meets the criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public wastewater treatment system, which involves the functional replacement of and improvements to existing mechanical equipment. 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 because construction will be taking place entirely within an existing WWTP that has experienced previous excavation. There are no high-value environmental resources in this developed area.

Is cost effective and is not a controversial action because replacement of failing components is a better alternative than refurbishment. Ohio EPA is unaware of opposition to or controversy about the project.

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 the loading of pollutants from an existing source or from new facilities to receiving waters because this project merely replaces existing WWTP components and has no other effect on the city sewer system.

Will not provide capacity to serve a population substantially greater than the existing population because this project is purely replacement within a WWTP, service will not be extended in any way nor provide additional capacity.

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. This project will ensure Black River WWTP continues to operate and provide service to the cities of Lorain and Sheffield Lake.

Contact information

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