



April 12, 2024

Limited Environmental Review and Finding of No Significant Impact

**Board of County Commissioners of Hamilton County, Ohio – Hamilton County
LMWWTP Flow Meter Renewal
Loan number: CS391525-0171**

The attached Limited Environmental Review (LER) is for a wastewater treatment plant upgrades project in Cincinnati 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: LMWWTP Flow Meter Renewal

Applicant: Board of County Commissioners of Hamilton County, Ohio
138 East Court Street
Cincinnati, Ohio 45202

Loan Number: CS391525-0171



Figure 1. Hamilton County

Project Summary

The Board of County Commissioners of Hamilton County, Ohio (Board) has requested funding from the Ohio Water Pollution Control Loan Fund (WPCLF) to finance the Little Miami Wastewater Treatment Plant (LMWWTP) Flow Meter Renewal project. Work for this project will include replacing failing flow meter equipment within the treatment plant and the installing bypass piping underneath the Ohio River Trail adjacent to the plant.

History & Existing Conditions

The Board, based in Hamilton County (Figure 1), manages the Metropolitan Sewer District of Greater Cincinnati (MSDGC), also known as the Metropolitan Sewer District (MSD). MSD operates a number of different wastewater treatment plants (WWTPs) within the City of Cincinnati, including the Little Miami WWTP, which is MSD's second largest treatment plant. It services an area of approximately 86 square miles and an approximate population of 237,000.

In 2020, an inspection of the Little Miami WWTP was performed to determine what upgrades would need to be implemented over the next ten years to keep the plant running in optimal condition. The number one priority project, upgrades to the plant's electrical systems, is underway now. Replacing the flow meters, which this project will cover, was determined to be the second highest priority action. The existing flow meters within the Little Miami WWTP have reached the end of their useful lives and have begun to fail, necessitating replacement.

The project will also install permanent bypass piping underneath the Ohio River Trail adjacent to the WWTP. This will allow wastewater flows to be diverted to another location within the plant for maintenance purposes. Currently, if this must be done, temporary piping is installed, blocking the trail. Permanent piping will prevent future trail access disruptions.

Project Description

This project consists of the replacement of failing flow meters within three areas of the Little Miami WWTP: the Four Mile Pump Station, the Little Miami Pump Station, and Aeration. In total seven existing flow meters will be replaced with 11 new flow meters. Pipes and electrical work surrounding the new flow meters will also be modified. In addition, permanent bypass piping will

be installed beneath the Ohio River Trail. See figures 2 and 3 at the end of the document for a map of the project area.

Implementation

The Board proposes to borrow approximately \$4.7 million from the Ohio WPCLF at the standard interest rate of 2.48%. WPCLF interest rates are set monthly and may change for a later loan award. Assuming a 20-year loan, borrowing this amount in WPCLF dollars could save the Board approximately \$721,000 over the life of the loan compared to the current market rate of 3.73%.

Sewer rates will not be raised to pay for this project. The average annual sewer bill for residents served by the Board is \$638. This is 1.4% of the median household income (MHI: \$45,235) and is higher than the Ohio average annual sewer bill, \$490. Construction began in August 2023 and is scheduled to be completed in approximately 19 months.

Public Participation

This project has been discussed at Hamilton County Commissioner's meetings open to the public from December 2020 through February 2023. A presentation was also given at the Columbia-Tusculum Community Council about the project in October 2022. A press release was sent out on March 27th, 2024, notifying the public about the closure of the Ohio River Trail that runs adjacent to the WWTP for about a month for project work, complete with a map showing possible detour routes (see Figure 4). Finally, a notice of construction letter was mailed out on March 28th, 2024, to about 84 parties including local residents, businesses, community councils and others who might be impacted by the trail closure and increased truck traffic around the plant.

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 the construction will be taking place inside and adjacent to 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 there is no viable alternative to replacing failing equipment within a WWTP. Ohio EPA is unaware of controversy about or opposition to this 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, and will not provide

capacity to serve a population substantially greater than the existing population because this project merely upgrades existing equipment within the WWTP and has no other effect on the discharges. 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 result in necessary improvements to the Little Miami WWTP.

Contact Information

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Figure 2. The Little Miami WWTP.



Figure 3. The red square shows the Ohio River Trail closure. Blue denotes where the meter replacements will take place.

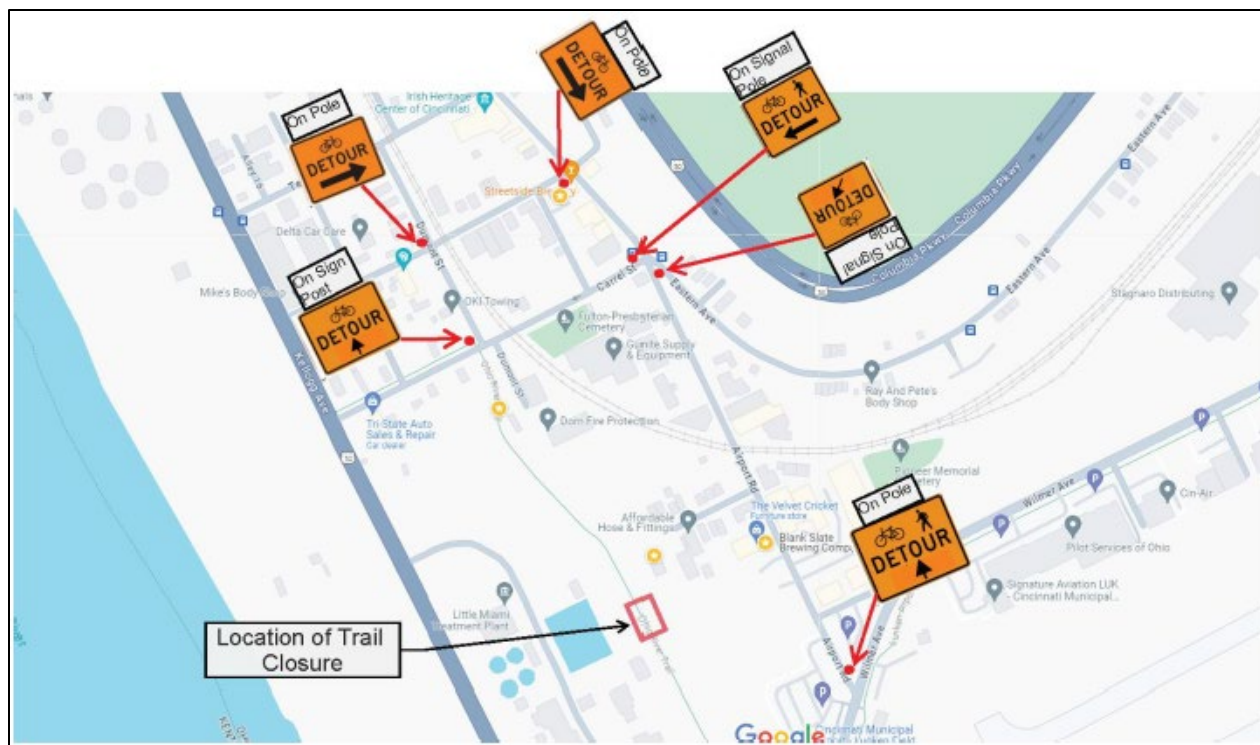


Figure 4. Potential Ohio River Trail detour routes.