



September 18, 2026

Limited Environmental Review and Finding of No Significant Impact

**Board of County Commissioners of Hamilton County, Ohio – Hamilton County
Lower Mill Creek HW/DW Protection
Loan number: CS391525-0187**

The attached Limited Environmental Review (LER) is for a wastewater infrastructure project in Cincinnati which the Ohio Environmental Protection Agency (Ohio EPA) intends to finance through its Water Pollution Control Loan Fund (WPCLF) below-market interest rate revolving loan program. The LER describes the project, costs, and expected environmental benefits. Making available this LER fulfills the 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 program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. In accordance with Ohio Administrative Code 3745-150-05, this project meets the criteria for an LER rather than the more comprehensive Environmental Assessment. More information can be obtained by contacting the person named at the end of the attached LER.

Upon issuance of this Final 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, reading "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Lower Mill Creek HW/DW Protection

Applicant: Board of County Commissioners of Hamilton County, Ohio
1600 Gest Street
Cincinnati, Ohio 45204

Loan Number: CS391525-0187



Figure 1. Hamilton County

Project Summary

The Board of County Commissioners of Hamilton County, Ohio (Board) requested funding from the Ohio Water Pollution Control Loan Fund (WPCLF) to finance the Lower Mill Creek HW/DW Protection project. Work for this project includes upgrading several combined sewer outfalls along the Ohio River to prevent backflows.

The Lower Mill Creek HW/DW Protection project will also act as a sponsor for the Mill Creek Low Head Dam Mitigation RM 11.8 project and the Mill Creek Low Head Dam Mitigation RM 13.4 project through the Ohio Water Resource Restoration Sponsorship Program (WRRSP). The WRRSP helps achieve Ohio's water quality goals by providing funds, through WPCLF sponsoring loans, to finance projects that protect or restore high-quality water resources. This environmental review document covers only the Lower Mill Creek HW/DW Protection project. Information on the WRRSP projects can be found in their respective environmental review documents. By sponsoring these projects, the Board is eligible for up to 0.1% discount on their WPCLF loan interest rate.

History and Existing Conditions

The Board, based in Hamilton County (Figure 1), manages the Metropolitan Sewer District of Greater Cincinnati, also known as the Metropolitan Sewer District (MSD). MSD operates a collection system and a number of different wastewater treatment plants (WWTPs) within the City of Cincinnati and the surrounding areas.

The combined sewer system in Cincinnati is very old and includes combined sewer overflows (CSOs) which convey sanitary sewer and stormwater flows directly to a waterbody (such as Mill Creek or the Ohio River) without receiving treatment from a WWTP. Many CSOs cannot be removed completely without adversely affecting the entire sewer system.

During high water conditions, river water has been found to flow back up through three CSO locations along the Ohio River. This results in river water entering MSD's WWTP, which causes a strain on the

treatment process. The dry weather (DW) part of this project involves repairing/rehabilitating the existing CSO structures and improving physical access to facilitate future repairs. The high water (HW) part involves installing physical barriers in the CSO structure to prevent river water from backflowing into the collection system during flood conditions while also allowing the CSO to operate normally under wet weather conditions.

Project Description

High water protection devices (gates, valves, etc.) will prevent river flows from entering the collection system and reduce treatment flows at the WWTP.

Project work at the first CSO location (CSO #422) will include relocating the CSO outfall from its current location along River Road to a location under Montreal Street to improve site access and provide safer conditions for future operation and maintenance activities. Once moved, the 60-inch diameter outfall pipe will be lined using cured-in-place-pipe (CIPP) liner, and a check valve will be installed downstream of the new diversion structure for backflow protection. Additionally, 127 linear feet (LF) of 30-inch combined sewer with three manholes and 98 LF of 24-inch combined sewer with three manholes will be constructed to convey flows to the new diversion structure.

Project work at the second CSO location will consist of combining and relocating two existing adjacent CSO outfalls (CSOs #452 and #453) that are currently located underneath an apartment building. The outfall will be moved south of Riverside Drive. A new diversion structure will be constructed, and a 48-inch in-line check valve will be installed for backflow protection. Additionally, 196 LF of 48-inch overflow sewer with a concrete outfall headwall will be constructed, surrounded by 36 inches of rip rap.

Project work at the third CSO location (CSOs #459 and 460) will consist of installing a 9-foot-by-9-foot concrete chamber with a 60-inch-diameter cast iron flexible flap valve for backflow protection. Additionally, 114 LF of 60-inch sewer pipe upstream of the new chamber will be rehabilitated by repairing/sealing cracks in the pipe. Also, 182 LF of 48-inches of sewer pipe downstream of the new chamber will be rehabilitated or replaced, depending on condition during construction.

While project work will be adjacent to the Ohio River along the banks, there will be no in-water work. The river will not be dewatered or rerouted. MSD has obtained the necessary permits from the U.S. Army Corps of Engineers. See Figure 2 below for a map of the project areas.

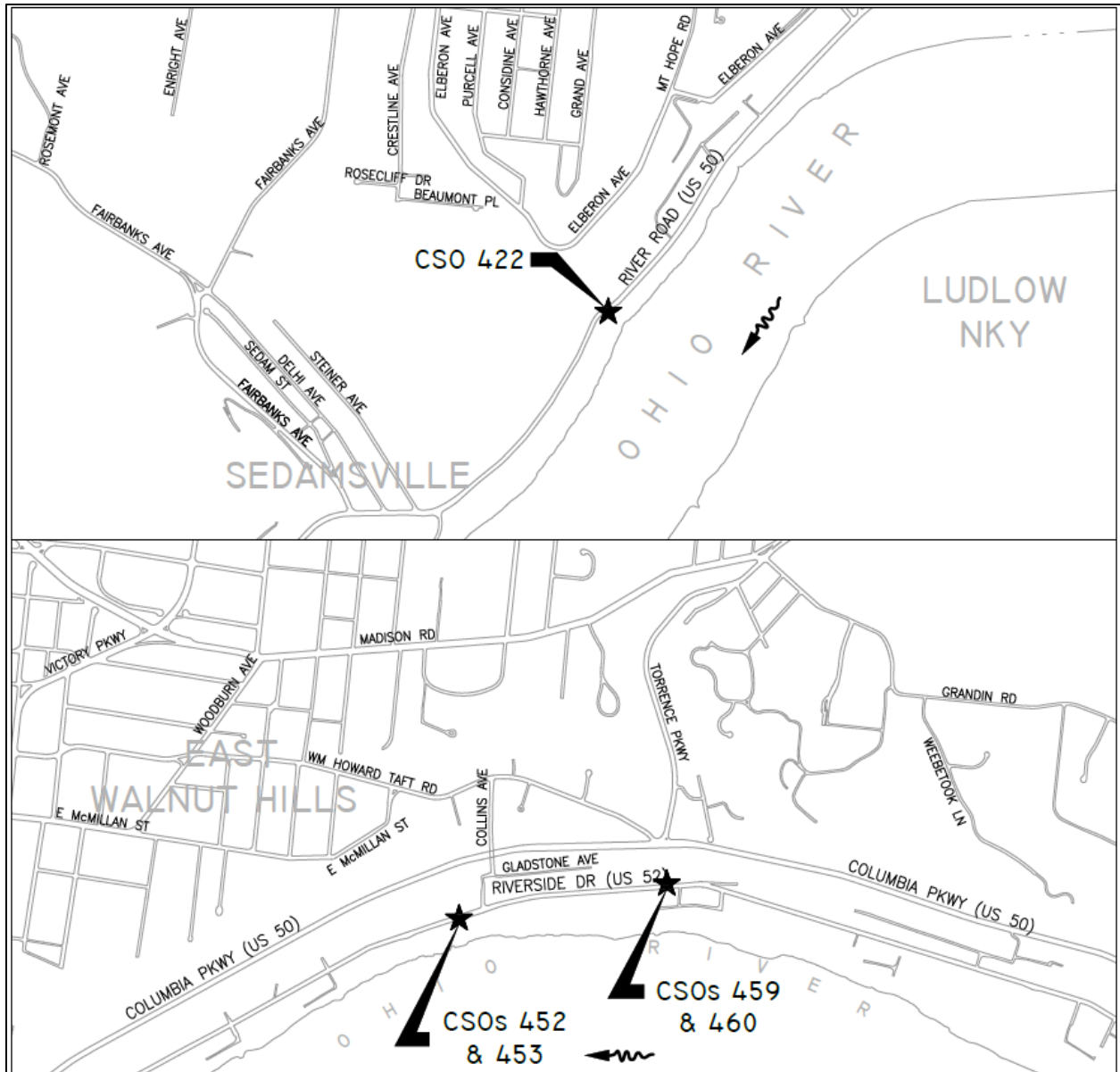


Figure 2. Map of the project areas

Implementation

The Board proposes to borrow \$5.9 million from the Ohio WPCLF at the standard interest rate of 3.19%. WPCLF interest rates are set monthly and may change for a later loan award. With the possible additional 0.1% discount for sponsoring WRRSP projects, the Board could save approximately \$1 million over the life of the loan compared to the current market rate of 4.44%.

Sewer rates are being raised by 4.50% in 2026. The current average annual sewer bill for residents served by the Board is \$640. This is 1% of the median household income (MHI: \$68,249) and is higher

than the Ohio average annual sewer bill, \$528. Construction began in June 2026 and is scheduled to be completed in approximately 11 months.

Public Participation

MSD has reached out to property owners adjacent to the project area, using mailed letters and a meeting. There have also been press releases.

Ohio EPA is unaware of any controversy about or opposition to this project. The Limited Environmental Review (LER) and Finding of No Significant Impact (FNSI) will be posted on the Ohio EPA Division of Environmental and Financial Assistance website. Additionally, the LER and FNSI have been provided to the Board of County Commissioners of Hamilton County, Ohio to be made available according to their public notification procedures.

Conclusion

The proposed project meets the criteria for an LER; namely, it is an action within an existing public wastewater collection system, which involves the functional replacement of and improvements to existing infrastructure. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect and will require no specific impact mitigation. No environmentally sensitive resources are likely present in the prior-disturbed waterfront areas where construction will take place.

Will have no effect on high-value environmental resources. Construction will not take place within the Ohio River. Work will occur during low river levels, and the river will not be dewatered or rerouted. The Board has obtained a nationwide permit from the U.S. Army Corps of Engineers for their work along the banks of the river.

Is cost effective. Other options for reducing backflow at these CSO locations were cost prohibitive and faced logistical challenges.

Is not a controversial action. 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 groundwaters, 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. The project replaces or rehabilitates existing wastewater infrastructure and reduces CSO discharges. The project will not extend service in any way nor provide additional capacity.

Based upon Ohio EPA's review of the planning information and the materials presented in this LER, we have concluded that there will be no significant adverse impacts from the proposed project as it

relates to environmental features. 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 help prevent backflow of the Ohio River into MSD's WWTPs during high water events, reducing the volume to be treated.

Contact Information

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