



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

**4/20/17**  
**Limited Environmental Review and Finding of No Significant Impact**  
**Covington Wastewater Treatment Plant Improvements – Phase I**  
**Miami County**  
**WPCLF # CS390287-0012**

The attached Limited Environmental Review (LER) is for a wastewater treatment project in your area 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 document.

Loan award will proceed without further environmental review or public comment unless new information shows that environmental conditions of the proposed project have changed significantly.

Sincerely,

*for* 

Jerry Rouch, Assistant Chief  
Division of Environmental and Financial Assistance  
Office of Financial Assistance

JR/DH

attachment

## LIMITED ENVIRONMENTAL REVIEW

### A. Project Identification

Project Name: Covington Wastewater Treatment Plant Improvements – Phase I

WPCLF# CS390287-0012

Address: Michael Busse, Village Administrator  
Village of Covington  
1 South Hight St  
Covington, OH 45318

### B. Project Summary

The Village of Covington has applied to the Ohio EPA, Division of Environmental and Financial Assistance (DEFA) for a Water Pollution Control Loan Fund (WPCLF) loan for a project to make improvements to the wastewater treatment plant (WWTP) that replace the aging effluent pump station and the current chlorine disinfection treatment with a safer ultraviolet light (UV) system.

### C. History and Existing Conditions

Covington is in Miami County and has a population of 2600.

Wastewater treatment facilities in the Village of Covington were originally constructed adjacent to the Stillwater River in 1941. Since that time, various improvements to the plant have been undertaken. These consisted of a plant expansion in 1956 and installation of plant effluent disinfection facilities in 1968. The plant was last expanded in 1980 to treat an average daily flow of 750,000 gallons per day.

The Village hired a consultant in 2013 to perform an evaluation of the aging wastewater treatment facilities and to identify needed improvements. The wastewater treatment facility is presently faced with the following challenges that impact the reliability of treatment systems and their performance:

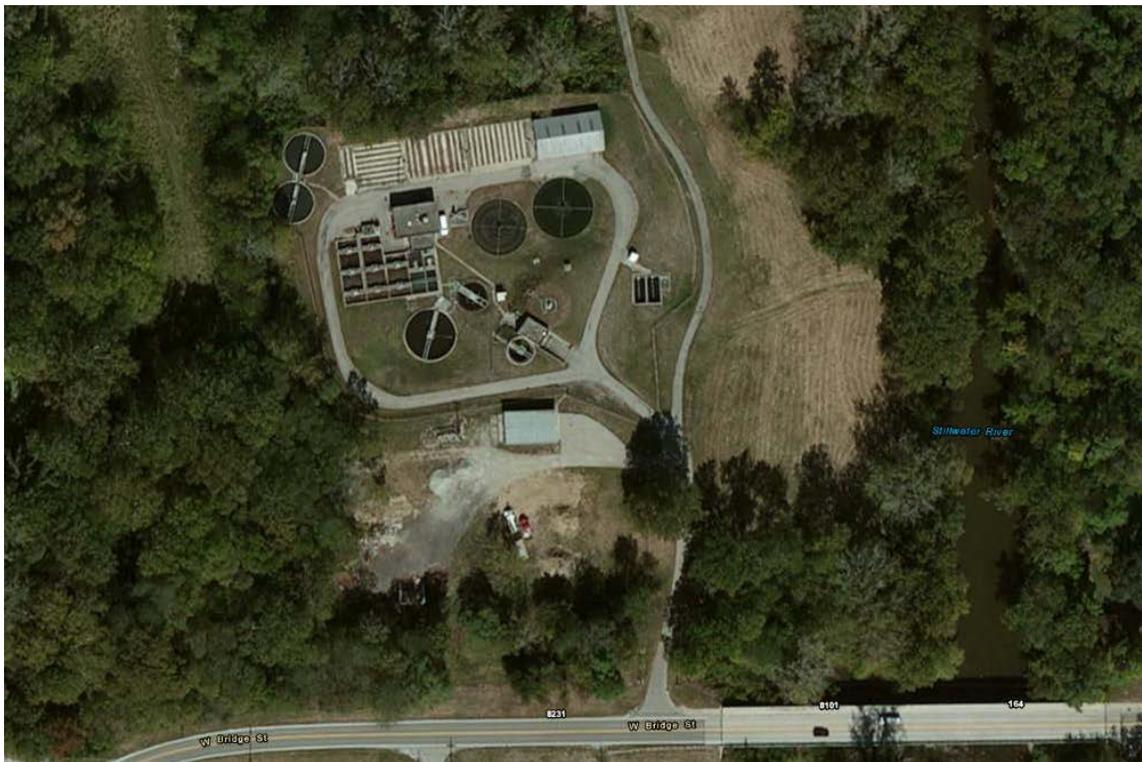
- The existing plant structures, some over 70 years old, are in need of repair.
- Plastics and rag accumulation reduces treatment efficiency, plugs piping, adds trash to the plant sludge and contributes to excessive and costly plant maintenance.
- The plant is not presently capable of meeting expected nutrient removal requirements, specifically for phosphorus, which will likely be imposed in the near future by Ohio EPA.

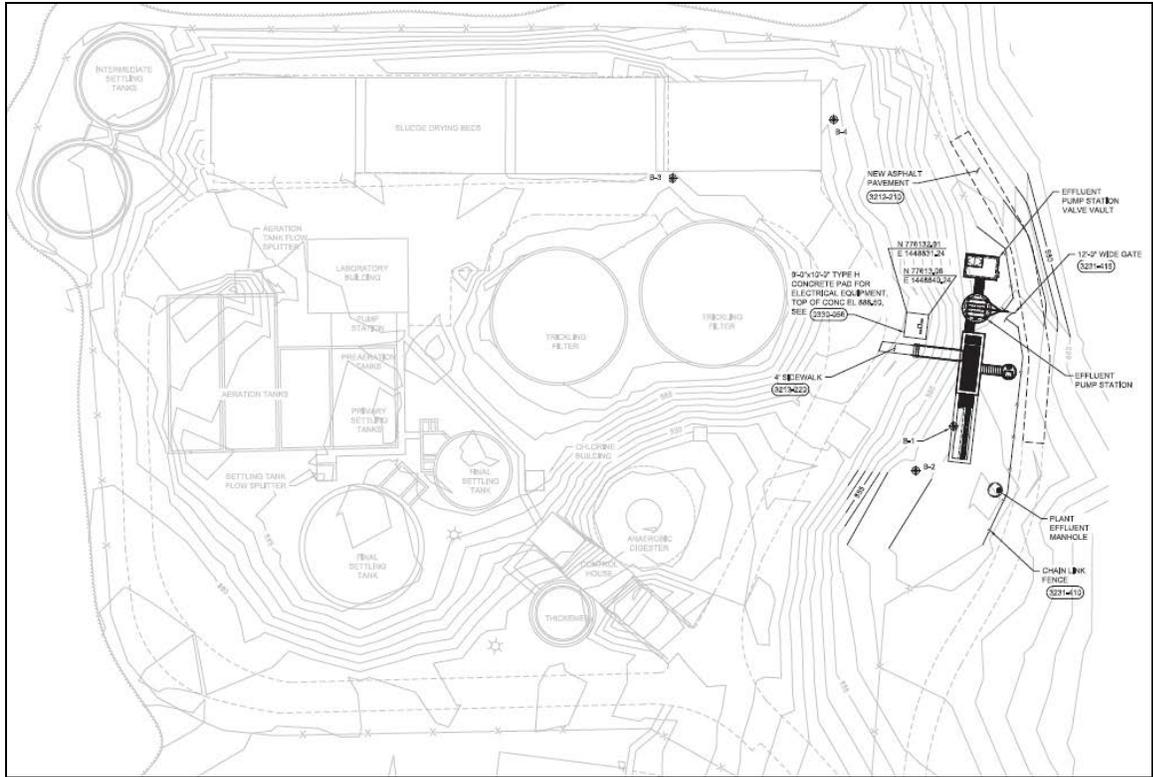
- The hydraulic grade line of the plant and the outfall to the Stillwater River allows high river water to back into and flood plant structures, thus limiting treatment capacity.
- Although adequate on-site sludge storage capability exists at the plant, cost saving options for sludge handling and disposal are limited.

#### D. Project Description

This project is the first of several phases to update the existing wastewater treatment facility. This phase includes the installation of an effluent pumping station to allow the plant to operate normally during high river conditions, replacement of the raw sewage grinder with a fine screen and screening dewatering unit, replacement of the gaseous chlorine system with a UV system, and conversion of the sludge thickener to a sludge holding tank.

Figures below show the project area and proposed improvements.





**E. Estimated Project Costs**

The total project cost is \$1,496,151. Covington will borrow approximately \$696,000 from the WPCLF at the Hardship interest rate of 1% and combine this loan with \$750,000 from an Ohio Public Works Commission (OPWC) grant and loan, and \$50,000 in local contributions. During the 20-year loan period, Covington will save approximately \$359,214 by using WPCLF dollars at this rate, compared to the market rate of 3.58%.

**F. Project Schedule**

Assuming WPCLF loan award in April 2017, construction will begin in September and is expected to be substantially complete in 300 days.

**G. Public Notification**

The Village has discussed the WWTP project at a number of regular Village Council meetings between 2012 and 2017 and in articles in the Piqua Daily Call.

The Village will place on its website this Limited Environmental Review (LER) and Finding of No Significant Impact (FONSI) decision.

For these reasons, the public information and participation opportunities that have been available are considered sufficient

Ohio EPA will also post the LER-FONSI at <http://epa.ohio.gov/defa/ofa.aspx> under the “What’s New” tab in the “WPCLF Documents Available for Review and Comment” list. Documentation supporting the LER is available from the project contact at the end of this LER.

#### H. Planning Information

A multidisciplinary comprehensive review was not required by Ohio Department of Natural Resources (DNR) because the project will occur within the footprint of the existing WWTP. A review by the Ohio DNR scenic river coordinator is also not required because the WWTP project is within the municipal boundaries of the Village of Covington.

A cultural resources survey was not required because the project area has already been disturbed by wastewater treatment plant construction and there is little potential for finding any items of historical significance.

A review by the Miami Valley Regional Planning Commission was not required because there will be no change in the service area.

#### I. Conclusion

The proposed project involves “minor upgrading” and “construction of new ancillary facilities adjacent or appurtenant to existing facilities” that qualifies for an LER and meets the following additional criteria for an LER:

*It has no significant environmental effect; it does not require extensive specific impact mitigation; and it has no effect on high value environmental resources* – All work is in the footprint of the existing wastewater treatment facility area which lacks important environmental resources. The Stillwater River is a State Scenic River. No work will occur in or immediately adjacent to the river or otherwise directly impact the river and erosion and sediment controls will minimize the potential for stormwater impacts to the river during construction. Additionally, the new facilities will be flood-proofed to allow the plant to operate normally during high river stage events. Standard construction best management practices will minimize noise, dust, traffic disruption, and storm water runoff.

*It is cost effective and not controversial* - Generally, repair and rehabilitation of a wastewater treatment facility is more cost effective than complete replacement. Debt for this project will be repaid from Covington’s sewer rates, which have been raised 5 percent per year since 2012 to cover anticipated costs. Based on information in the

loan application, residential sewer customers will pay an average of approximately \$227 per year in 2018 (the year after completion of the project). This is approximately 0.6 percent of the annual median household income in Covington of \$39,592 and is considered to be in the affordable range. Additionally, Ohio EPA is unaware of controversy about or opposition to this project.

*It does not create a new, or relocate an existing, discharge to surface or ground waters; it 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; it will not provide capacity to serve a population substantially greater than the existing population* – This project will upgrade the existing wastewater treatment facility by installing an effluent pumping station and replacing a gas chlorine feed system with a safer UV system and will have no other effect on the outfall location, sanitary sewer system or sewage treatment capacity. It will not increase discharge volume or loading of pollutants and will not provide additional treatment capacity.

The proposed project meets all applicable criteria for a Limited Environmental Review. 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 waters, coastal zones, floodplains, wetlands, state-designated scenic or recreational rivers, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, threatened or endangered species, or state and federal wildlife areas). Applicable construction impact mitigation measures and practices have been included in the planning documents.

For more information, please contact:

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