LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Sanitary Sewer System Improvements Project

City of Hubbard Applicant:

> 220 West Liberty Street Hubbard, Ohio 44425

Loan Number: CS390460-0016

Project Summary

The City of Hubbard City is requesting \$50,000 in principal forgiveness from the Ohio EPA Water Pollution Control Loan Fund (WPCLF) for generator replacement at two pump stations. This project includes replacement of approximately 600 linear feet of sanitary sewer on Hall Avenue and miscellaneous improvements to two sanitary pump stations. Based on this requested funding, no rate increases will be needed.

History & Existing Conditions

Hubbard has a population of 7,525. The city owns and operates the existing sanitary sewer system. Sanitary flows from the homes and businesses are conveyed to Hubbard's wastewater treatment plant (WWTP). The 8-inch sanitary sewer on Hall Avenue has reached the end of its useful life and requires replacement.

The city has also found that the generators and transfer switches at the North Main Street and Timber Point pump stations have reached the end of their useful life and require replacement.

Project Description

This project includes replacement of approximately 600 linear feet of 8-inch sanitary sewer on Hall Avenue. Additionally, the city will make improvements at two pump stations that includes two new generators. Figure 2 below shows the proposed project.

Implementation

To construct the proposed project described above, Hubbard intends to finance the improvements through two funding sources in addition to Ohio EPA's WPCLF. These include local funds (roughly \$432,000) and \$276,000 in state infrastructure grants. Hubbard requested backup generator principal forgiveness in the amount of \$50,000 from Ohio EPA. This is a loan that will not require repayment.

Ohio EPA anticipates that Hubbard will be able to generate enough revenue under its current rate structure to continue to own, operate, and maintain its wastewater collection and treatment systems well into the future.

City of Hubbard April 2024 Page 1 The average annual residential wastewater bill is \$525 or about 0.93% of the city's current median household income of \$56,220. This is slightly higher than the Ohio average sewer bill of \$490.

Assuming loan award in May 2024, Ohio EPA expects that the city's contractor will commence construction soon thereafter and complete work in a few months. By making these improvements, including site restoration, Hubbard expects to be able to address its collection system and pump station problems.

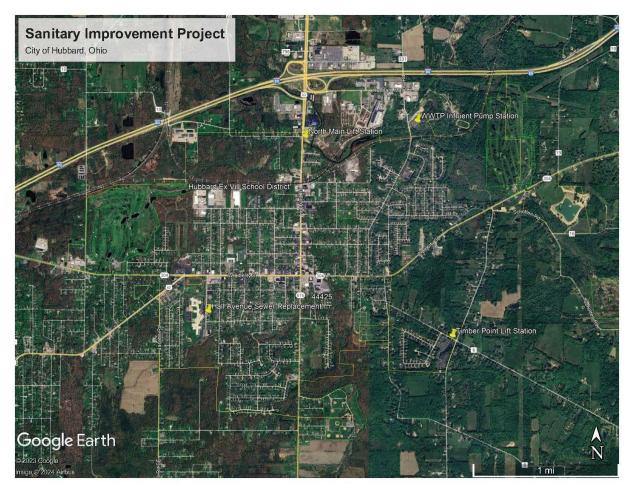


Figure 1. Project map

Public Participation

According to the city, the public was provided with opportunities to learn more about this collection system improvements project. This included public council meetings referenced in the minutes from the mayor's June 19, 2023, report to the city. This report announced the funding that was secured through the Ohio Department of Development (ODOD) for the Hall Avenue portion of the project.

On this basis, and the limited scope of the project covered by this document, Ohio EPA has determined that no additional public review and comment on the proposed project is necessary.

City of Hubbard April 2024 Sanitary Sewer System Improvements Project Page 2 Ohio EPA will make a copy of this document available to the public on its web page (https://epa.ohio.gov/wps/portal/gov/epa/divisions-and-offices/environmental-financial-assistance/announcements web page) and will provide it upon request. A copy may also be posted at the city's offices and on its web site (if available).

Conclusion

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

Will have no significant environmental effect and will have no effect on high value environmental resources. Given the proposed project's limited scope, placement within prior-disturbed locations, the absence of any notable above-ground natural features within the immediate project area, and the city's approach to addressing potential effects, the proposed project will not result in any adverse environmental impacts. This conclusion is validated by the reviews completed by Ohio EPA. Limited site grading is the only aspect of the proposed project that may result in noticeable construction impacts. As a result, the city will need to include the needed mitigation in the detail plans to address these potential concerns. There are no streams or wetlands in the project location.

Will not require extensive, specific impact mitigation unique to the assistance proposal. The proposed work to complete this project is generally straight-forward and does not require any extensive mitigation of environmental impacts, as all the pump station and sanitary sewer improvements will be made within previously disturbed areas. In that regard, only routine environmental impact mitigation such as storm water controls, spill control, dust control, vehicle emission and traffic controls, and adherence to prohibited construction activities should be necessary during the estimated three month long construction timeframe. The city expects that any spoil material generated during construction will be taken off-site and disposed of in accordance with all laws and regulations covering this activity to protect floodplains and wetlands.

Is cost effective and not the subject of controversy or significant public interest. In comparison to no-action, the city's selected alternative is more cost effective on the basis of costs and non-monetary factors. Moreover, the proposed improvements constituting this project are non-controversial because they will not adversely impact the environment, or the residential rates.

Does not create a new, or relocate an existing discharge to surface or ground waters, and will not substantially increase the volume of discharge or loading of pollutants from an existing source or from new facilities to receiving waters. Given the project's limited scope, these criteria have been met.

Will not provide capacity to serve a population substantially greater than the existing population. Based on information provided by the city during planning, Hubbard's service area is not expected to grow significantly during the next twenty-five years in response to this limited project. The overall annual demand for wastewater service provided by the city is indicative of this pattern. In addition, the main purpose of this project is to make improvements within or adjacent to existing infrastructure without any changes in sanitary sewer capacity or to promote future growth. On this basis, this criterion has been met.

City of Hubbard April 2024
Sanitary Sewer System Improvements Project Page 3

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. To conclude, the city's project will address the pump station's aging equipment and potential human health concerns due to aging sewer lines, while minimizing the economic effects on residents.

Contact information.

Kevin Hinkle
Ohio EPA, Division of Environmental and Financial Assistance
Office of Financial Assistance, Technical Review Section, Environmental Planning Unit
PO Box 1049
Columbus, Ohio 43216-1049

Email: kevin.hinkle@epa.ohio.gov