Public Notice
City of Tiffin, Ohio
Rock Creek Interceptor Sewer Improvement Project
Environmental Review Documents for Public Review

The Ohio EPA is considering funding a project through the Water Pollution Control Loan Fund (WPCLF) which is subject to environmental review requirements. The project consists of rehabilitation of the Rock Creek Interceptor Sewer upstream of the Circular Street Bridge. The Ohio EPA is making available for public review a Finding of No Significant Impact (FNSI) and an Environmental Assessment (EA) of potential environmental impacts.

The City is providing the FNSI and EA at the City Office, on the City website (www._____) and at the _____ _____ Library. The documents are also available at Ohio EPA's website (http://www.epa.state.oh.us/Default.aspx?tabid=2202).

Comments on the environmental review may be submitted to the project Environmental Planner at Ohio EPA listed at the end of the EA.

Ohio | Environmental Protection Agency
John R. Kasich, **Governor**
Mary Taylor, **Lt. Governor**
Scott J. Nally, **Director**

SEPTEMBER 27, 2011

FINDING OF NO SIGNIFICANT IMPACT
TO ALL INTERESTED CITIZENS, ORGANIZATIONS, AND GOVERNMENT AGENCIES

CITY OF TIFFIN
ROCK CREEK INTERCEPTOR SEWER IMPROVEMENT PROJECT
SENECA COUNTY
WPCLF LOAN # CS 390910-0001

The purpose of this notice is to seek public input and comments on Ohio EPA's preliminary decision that a Supplemental Environmental Study is not required to implement the recommendations discussed in the attached Environmental Assessment of the facilities plan submitted by the entity mentioned above.

How were environmental issues considered?	The Water Pollution Control Loan Fund program requires the inclusion of environmental factors in the decision-making process. Ohio EPA has done this by incorporating a detailed analysis of the environmental effects of the proposed alternatives in its review and approval process. Environmental information was developed as part of the facility plan, and associated documents, as well as through the facility plan review process and during site inspections. The Agency's preliminary Environmental Assessment found that the project does not require the preparation of a Supplemental Environmental Study.
Why is a Supplemental Environmental Study not required?	Our environmental review concluded that significant environmental impacts did not result from the action. Any adverse impacts have either been eliminated by changes in the facilities plan or have been reduced by the implementation of the mitigative measures discussed in the attached Assessment.

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How do I get more information?	A map depicting the location of the project is included as part of the Environmental Assessment. The Environmental Assessment presents additional information on the project, alternatives that were considered, impacts of the action and the basis for our decision. Further information can be obtained by calling or writing the contact person listed in the back of the Environmental Assessment.
How do I submit comments?	Any comments supporting or disagreeing with this preliminary decision should be submitted to me at the letterhead address. We will not take any action on this facilities plan for 30 calendar days from the date of this notice in order to receive and consider any comments.
What happens next?	In the absence of substantive comments during this period, our preliminary decision will become final. The municipality will then be eligible to receive loan assistance from this agency.

Please bring any information that you feel should be considered to our attention. We appreciate your interest in the environmental review process.

Sincerely,

Gregory H. Smith, Chief
Division of Environmental &
Financial Assistance

GHS/JRJ

Attachment

ENVIRONMENTAL ASSESSMENT

A. Project Identification

Name: City of Tiffin
Rock Creek Interceptor Sewer Improvement Project

Address: James Boroff, Mayor
City of Tiffin
51 East Market Street
Tiffin, Ohio 44883

Loan Number: CS390910-0001

B. Project Summary

The City of Tiffin has applied to the Ohio EPA, Division of Environmental and Financial Assistance (DEFA) for a loan of approximately $1,862,500 from the Ohio Water Pollution Control Loan Fund (WPCLF). The loan would finance improvements to the Rock Creek Interceptor Sewer, including replacement and installation of cured-in-place pipe (CIP) in the interceptor sewer. The proposed project is needed to implement the next phase of the City's Long-Term Control Plan for separation of the combined sewer system, and to meet the construction compliance schedule included in the wastewater treatment plant's (WWTP) National Pollutant Discharge Elimination System (NPDES) permit.

Ohio EPA's environmental review, described herein, concludes that construction of the project will cause no significant adverse environmental impacts. The detail plans and specifications include environmental protection measures to prevent potential construction impacts on nearby environmental resources. By reducing combined sewer overflows (CSOs), this project will have the benefits of reducing the threat to public health from possible contact with sewage, and improving the water quality in Rock Creek.

The City anticipates construction will begin in November 2011 and be completed in June 2012. The City has a sewer ordinance that provides for rate increases each year and anticipates that the existing sewer rates schedule will be sufficient to re-pay the project loan.

C. Existing Conditions

1. Service Area and Population:

The City of Tiffin is located in the central portion of Seneca County. Rock Creek flows from southeast to northeast through the southeast part of the city and discharges into the Sandusky River about 0.25 miles north of the project area. The City currently has a population of 17,963 with future projections indicating a continued trend of slight population decrease.

2. Wastewater Infrastructure:

Tiffin has a wastewater system that includes combined sewers to convey both sanitary sewage and precipitation-derived storm flows. The city's collection system is 55% separated sanitary sewers and 45% combined sewers. When flows exceed the hydraulic capacity of the combined sewers, the excess flow is diverted into streams through existing combined sewer overflow (CSO) structures. There are 30 CSO points in the collection system.

The WWTP is located near the northern boundary of the city and has a design flow of 4.0 million gallons per day (MGD). Average daily flow from the collection system was 3.5 MGD in 2010. During wet weather, infiltration and inflow (I&I)[1] from the old combined sewers causes a peak flow of 10.1 MGD. When peak flows exceed the treatment capacity of the WWTP, a portion of the flow is routed around secondary treatment to a storm chlorination tank and dechlorinated before recombining with fully-treated effluent for discharge to the river.

The city submitted a CSO Long-Term Control Plan to Ohio EPA in June 2006. After revisions, the plan was approved in 2008. The compliance schedule in the current NPDES permit calls for elimination of all CSOs by construction of new separated sewers in 15 phases. The last phase is scheduled for completion in December 2026.

The Rock Creek Interceptor Sewer is comprised of vitrified clay pipe installed in the 1950s and is in poor condition. There are four combined sewer systems connected to the upper Rock Creek interceptor, with each having a CSO point. Wet-weather flows that exceed the capacity of the interceptor sewer cause the combined sewers to overflow and discharge into Rock Creek.

The LTCP initially intended the lower section of the interceptor sewer to remain in use after it was cleaned and rehabilitated. It is located along the base of the retaining wall in the Rock Creek channel. The lower section of the interceptor was inspected in 2006. Cleaning and video work was not done because the needed access was not possible due to covered manholes, the sewer's location in the concrete channel, and the large amount of grit and debris in the sewer. The visual inspection showed it was not practical to implement the initial plan for cleaning and rehabilitating the lower Rock Creek Interceptor.

The upper section of the interceptor, which is south of Rock Creek was cleaned and inspected in 2010. Two sections of the interceptor are very close to the creek bank. The City reported that they have repaired one section of pipe two times because the creek bank had eroded, exposing the sewer and allowing it to collapse into the creek. Much of the

[1] Infiltration & inflow (I&I) is defined as extraneous, clear water that enters a sanitary sewer system through surface or subsurface locations. Inflow may include clear water entering the system through manhole covers, roof or foundation drains, direct storm sewer connections, etc. Infiltration usually occurs when clear water enters the system below ground through cracked or broken pipes and manholes, poorly sealed or misaligned pipe joints, damaged or poorly connected sewer laterals, etc.

upper section of the interceptor is in the floodplain of Rock Creek and excessive I&I is suspected during flooding or high ground water. The brick manholes have perforated covers and the mortar is severely deteriorated. During manhole inspection, it was found that the sewer was two thirds full under dry-weather conditions. It was necessary to remove dirt and debris for the inspection, and use a cutter to remove roots at joints and cracks. When the cleaning and video inspection were complete, most of the interceptor flowed at a depth of a quarter pipe or less, the expected depth developed in the model for dry-weather flow. The video showed that most of the vitrified clay pipe has a longitudinal crack at the top, several sections of the pipe are badly cracked and there are joint failures.

D. Discussion of Alternatives

The proposed improvements to the interceptor are needed to allow the subsequent tasks to be undertaken for separation of the four combined sewer systems as required in the LTCP and compliance schedule in the NPDES permit.

The alternatives considered to address problems with the interceptor included:

- Replacement of the entire upper section of the interceptor
- A combination of rehabilitation and replacement

Complete replacement and relocation of the upper section of the interceptor is not a feasible alternative because of increasing ground elevations moving away from the creek, which would result in very deep excavations. New easements would also be needed for the entire length of the interceptor.

In the second alternative, new sections of interceptor would be offset slightly from the badly damaged sections of existing sewer. Sections very close to the creek would be moved away from the creek to eliminate the danger of being exposed by erosion. Sections of the sewer in fair condition would be rehabilitated by installing cured-in-place pipe. The new sections would then be connected to the rehabilitated sections.

E. Selected Alternative

The second alternative has been chosen for design of the project. Rehabilitating parts of the sewer with CIPP is less expensive than replacing the entire sewer. Using CIPP reduces the amount of open-cut sewer installation, which will significantly reduce the potential for environmental impact during construction.

As discussed in Section C.2, it is impractical to replace or rehabilitate the lower part of the interceptor. Therefore, it will be necessary to divert the upper part of the interceptor into a new 18-inch diameter sewer in Circular Street on the north side of Rock Creek. This will require routing the interceptor across the creek.

The City will also install a new sewer on Main Street. Many residences on this street are served by sanitary laterals that run across other private properties directly to the

interceptor. Some of the laterals serve multiple residences. A short section of existing sewer on this street has no manholes, making it difficult to maintain. The City's standard is to provide a single dedicated lateral for each residence and to avoid crossing other properties with them.

Approximately 3,200 feet of 12-inch diameter interceptor replacement sewer and 2,700 feet of CIPP will be installed. All manholes on the CIPP sections also will be replaced. Approximately 900 feet of 8-inch diameter sanitary sewer tributary to the interceptor will be installed on Main Street. About 500 feet of 8-inch diameter sanitary sewer will also be installed at the north end of the project area on the south side of Rock Creek to transfer several residences to the upper interceptor from the lower interceptor which will be abandoned in the future.

F. Project Implementation

Ohio EPA issued the required Permit- to-Install (PTI) for the proposed project in August 2011. The City expects construction of the project will begin in November 2011 and be completed by June 2012.

The total eligible cost of the project is estimated to be $1,862,500. It is expected to be entirely funded with a 20-year below-market standard interest rate loan from the WPCLF administered by Ohio EPA. The interest rate can change monthly and is 3.08% for loans awarded in the month of September. At the September rate, the City would save approximately $294,280 in principal and interest costs using WPCLF funds compared to an OWDA market rate loan at 4.33%.

G. Environmental Impacts of the Proposed Project

Given the location of this proposed project along Rock Creek, it has the potential to adversely impact environmental resources on a short-term basis. However the project is not designed to provide additional sewer capacity, so there should be no new development as a result of the project that could cause indirect or long-term cumulative impacts.

The potential for adverse impacts to environmental attributes from implementation of the project are evaluated below. Where there is potential for adverse impact, measures to avoid, minimize or mitigate impacts are discussed.

Major land forms - The land surface will be restored to original contours and permanently stabilized by mulching and seeding. Therefore, major land forms will not be affected by the project.

Floodplains - The southern portion and northern portion of the interceptor sewer lie in the 100-year floodplain of Rock Creek. There will not be any above ground structures built as part of the project, nor will excavated spoil material be left on site. Therefore, flood flows will not be impeded by the project.

Wetlands - No wetlands subject to state or federal jurisdiction exist near the sewer alignment, so none will be affected by the project.

Surface water - The project requires a crossing of Rock Creek at its north end to tie into an existing city sewer. This crossing will have less impact to the stream than replacing the lower part of the interceptor in the stream channel. The U.S. Army, Corps of Engineers (COE) has issued a Nationwide Permit (NWP) #12 (Utility Line Activities) for the creek crossing. The contractor is required to comply with the mitigative provisions of the current version of NWP #12, including COE regional general conditions and state of Ohio general and special conditions. The plan specifications require a bypass pumping plan and procedures for properly diverting stream flow, and completion of the crossing within 48 hours of initiation. All other work, including erosion protection within 50 feet of the stream, is to be performed immediately after the pipe has been placed across the stream, without interruption and within the shortest time practical.

The city has obtained storm water coverage of the project under the NPDES General Construction Permit for discharge of water from the site. The permit requires preparation of a storm water pollution prevention plan (SWP3) implementing construction best management practices to control erosion and release of silt into surface water.

Mitigative measures in the plans and specifications, and in the SWP3 include: limiting the area of soil disturbed, installing silt fencing prior to disturbance to capture sediment, diverting runoff away from areas to be disturbed and from soil piles, installing filter barriers around catch basins, using gently-sloping grassed areas or swales to filter and infiltrate small amounts of water, and stabilization by seeding and/or mulching. Contractors will be required to settle or filter larger amounts of sediment laden water from disturbed areas, trenches and dewatering before discharge to any surface water drainages.

The practices and measures previously discussed will help ensure that any potential short-term and long-term direct adverse impacts to surface water from construction of the project are not significant. Long-term and cumulative indirect adverse impact to surface water due to the project should also be insignificant because the project is not designed to provide additional sewer capacity, so there should be no new development.

Ground water – Since the interceptor is at or near creek level along the entire alignment, dewatering of the trench may be necessary during construction. The dewatering will be short-term and the effect on ground water levels should be localized. None of the residences in the project area depend on water wells. Tiffin water supply wells are located about 1.5 miles to the west, a substantial distance from the present area. Thus, the expected dewatering should not significantly affect ground water, drinking water supplies, or the regional aquifer.

Terrestrial and aquatic habitat - About 500 feet of the southern half of the alignment is wooded. The new sewer parallels the existing sewer through this area, but the alignment has been moved about 40 feet farther away from the creek, which will reduce the potential for impact to the riparian zone. Moving the alignment out of the woods and even further away from the creek was considered, but that would put it in the back yards of homes and

increase the depth of excavation. The contractor will cut any trees that have to be removed only after September 30 and before April 1 when Indiana bats would not be using the area for roosting or brood rearing (see below for more information). Trees in the temporary easement will be replaced and disturbed areas will be stabilized with perennial vegetation. Aside from this wooded area, the treed portion of the riparian zone along the creek is very narrow and the alignment is outside this zone.

Rock Creek has a designated aquatic life use of Warmwater Habitat. A Warmwater Habitat designation is defined as "waters that have been subject to use attainability analysis and found to be capable of supporting and maintaining a balanced, integrated, adaptive community of warmwater aquatic organisms." Upstream of the City, the stream is in attainment of its aquatic life use. However, where the sewer will cross the creek, it is channelized and there is no quality habitat.

Given the foregoing conditions, impacts to terrestrial and aquatic habitat from construction of the project will not be an issue along most of the alignment. Impacts to the wooded part of the alignment, while unavoidable, should not be significant due to the City's efforts to inimize tree clearing and restore the site.

Threatened or endangered species - The Ohio Department of Natural Resources (ODNR) completed an interdisciplinary review within the Department. ODNR indicated that the proposed project is within the range of three federal and state-listed at risk species. The bald eagle (Haliaeetus leucocephalus) is a state-listed threatened species. An Ohio EPA inquiry of the ODNR, Crane Creek Research Center did not identify any eagle nesting or roosting activity within several miles of the proposed project.

The Indiana bat (Myotis sodalis) is listed as a federally-endangered species. Trees with loose bark, cracks, cavities, etc. can provide suitable Indiana bat summer roosting and brood-rearing habitat. As previously discussed, the contractor will cut any trees only after September 30 and before April 1 when Indiana bats would not be using the area for roosting or brood-rearing.

The project is within the range of the rayed bean mussel (Villosa fabalis). Existing conditions are not favorable to support any population of the mussel. The stream has been channelized in this area and, immediately downstream of the proposed crossing, it is enclosed by masonry walls. The plan specifications require that the construction work necessary for crossing the stream occur only during low flow conditions, and be performed without interruption within the shortest time practical. The installation will be completed in a dry setting, using bypass pumping. In addition, the stream crossing and associated restoration must be completed within 48 hours. These measures should be sufficient to mitigate any potential impacts to the mussel, if any are present. The U.S. Fish and Wildlife Service was consulted and concurred with this conclusion.

For the above reasons, no federal or state-listed threatened, endangered, or special interest species or critical habitat will be significantly impacted directly or indirectly by the project.

Agriculture and Land Use – The area surrounding the project is predominantly residential, and institutional (Heidelburg College campus). There is no agricultural land use in the vicinity of the project. The area served by the project is fully developed and the size of the interceptor sewer will not be increased. Therefore, there will be no new development as a result of the project and land use will not change significantly.

Air Quality – Air quality in Seneca County is currently in attainment of national ambient air quality standards. The project may affect air quality to some degree due to emissions from construction equipment and short-term increases in dust due to disturbance of soil and tracking of mud onto streets. The construction activity will move along the alignment as sewer work progresses, so the effect of emissions on air quality should be temporary and transient. Project specifications require contractors to take measures as necessary to minimize dust, such as water spraying, removing soil from paved roads and cleaning equipment before leaving the construction site. Long-term generation of dust should not occur because construction is not considered complete until final stabilization of disturbed areas with perennial vegetation or equivalent is accepted by the City.

For the above reasons, the proposed project would not be the cause of any air pollutant approaching its regulatory level, and any local air quality effects should be insignificant.

Noise - There will be a short-term increase in noise due to construction activities from transient and intermittent operation of construction equipment. Noise from construction activities will be most noticeable at residences adjacent to the sewer alignment. The noise will be temporary and localized as work progresses along the alignment. Noise control provisions in the project plans should limit noise impacts to acceptable levels, so it is not likely to significantly affect residents in the project area. These provisions include construction equipment being provided with intake silencers and mufflers, and work being limited to daylight hours. No long-term direct or indirect increase in noise levels will result from the project because it is a gravity sewer requiring no mechanical equipment, and the sewer improvements are not designed for growth.

Traffic - The alignment is mostly off-road except for 900 feet on Main Street and 130 feet on Circular Street near the north end of the alignment. Traffic will be affected temporarily and intermittently in some parts of the project area due to construction activities. The Specifications require a traffic control conference of the contractor, City personnel, and consulting engineer a minimum of 14 days prior to any activity that impedes normal traffic flow. Traffic control devices and methods, including flag persons, will be utilized in accordance with ODOT standards when traffic is affected by construction work. The improvements do not increase the size of the sewer, so there will not be any increase in traffic due to development. Thus, there should not be a significant short-term or long-term change or increase in local traffic flow due to the project.

Safety - Public safety will not be compromised by the proposed project, as provisions included in project plans will address public and worker safety. For example, trench backfill operations shall closely follow installation of pipe, after inspection and testing are complete. Excavations remaining open at the end of day will be securely enclosed, protected by barriers, and/or covered to prevent unauthorized access. Although streets may require

temporary closing for construction activities, the contractor must provide safe ingress and egress at all times to properties adjacent to the sewer alignment unless working in the immediate area.

Aesthetics –Trenches excavated to replace or install sewers will be backfilled, restored to original contour and stabilized by mulching and seeding or covered with pavement. Manholes will be installed at ground level. Therefore, there will be no change in aesthetics due to the project.

Archaeological and Historical Resources - A review of Ohio Historic Preservation Office (OHPO) sources found records of archaeological sites in the project area. Therefore, a field investigation was executed for the parts of the alignment where soil will be disturbed for sewer replacement. The cultural resources consultant conducted a field study and prepared a report titled Results of a Phase I Archaeological Reconnaissance Survey for the Proposed Upgrades to the Rock Creek Interceptor Sewer in the City of Tiffin, Seneca County, Ohio (September 2011). Six historic-period archaeological sites were identified and assigned Ohio Archaeological Index numbers, 33SE0705 to 33SE0710. It describes 3 of the archaeological sites (33SE0705, 33SE0707 and 33SE0710) as not eligible for the National Register of Historic Places (NRHP).

For the other 3 sites (33SE0706, 33SE0708 and 33SE0709), the report states that not enough information was collected to make a firm recommendation of NRHP eligibility. The consultant did not recommend a second phase of investigation at these sites.

Based on a review of the historic contexts of these sites and artifacts recovered from them, it is Ohio EPA's opinion that none of them meet the NRHP eligibility criteria in 36 CFR 60.4 with respect to significance, integrity, association or information important in history. The report was submitted to the OHPO for review.

If other sites are found during excavation, the City and its contractors are subject to Ohio Revised Code, Section 149.53, which requires contractors and subcontractors to notify OHPO (as well as Ohio EPA) of any discoveries in the project area, cease work immediately, and cooperate with OHPO (and Ohio EPA) in any archaeological and historic surveys and salvage efforts, as appropriate.

There are numerous residences more than 50 years old in the part of the City served by the interceptor sewer. There are several residences near the parts of the interceptor alignment to be replaced. A new sewer tributary to the interceptor will be installed from Rock Creek running west about 900 feet in the paved part of the Main Street right-of-way. Manholes will be installed at ground level, the sewers replaced or installed will be entirely below ground, and disturbed areas will be restored. Therefore, there will be no direct or indirect (visual) adverse effect on the historic characteristics of buildings in the project area.

Local Economy - The project is expected to be funded by a below-market-rate loan from Ohio EPA's WPCLF program. The project costs, as well as the operation, maintenance, and replacement costs for these improvements, will be paid through the City-wide sewer charges.

The annual median household income (MHI) for Tiffin is $35,444 according to available census figures. The City's current average residential sewer service cost from information in the loan application is $653 per year. These sewer costs represent about 1.8% of the MHI, which is in general considered affordable. The City has a sewer ordinance providing for rate increases each year and anticipates that the existing sewer rates schedule will be sufficient to repay the project costs. The Long-Term Control Plan for separation of the City's sewers will be implemented over a period of fifteen years to mitigate economic impacts for its residents. Based on the current September WPCLF loan rate, the City would save approximately $294,280 in principal and interest costs using WPCLF funds compared to an OWDA market rate loan.

H. Public Participation

The proposed project is part of Tiffin's Long-Term Control Plan for complete sewer separation, which was approved by Ohio EPA in November 2008. The proposed project has been discussed in City Council meetings, which are open to the public. The Mayor has discussed the project in articles in the Advertiser-Tribune newspaper in July and September 2010, and in May and June 2011. The engineering consultant gave a presentation on the project during a Council meeting in September 2010. The presentation covered why the project is needed, the estimated cost, funding sources and schedule. Residents along the project alignment have been contacted by the City. In addition, this Environmental Assessment will also be available for review at the City office and other public facilities.

The following agencies reviewed this project's planning information:
Seneca County Regional Planning Commission
Ohio Environmental Protection Agency
Ohio Historic Preservation Office
Ohio Department of Natural Resources

None of the agencies has opposed the project. Ohio EPA is unaware of controversy about or opposition to the project.

I. Reasons for a Preliminary Finding of No Significant Impact

Based on a review of the planning information, including the "Rock Creek Interceptor Design Report", permits, interagency reviews, detail designs and specifications, Ohio EPA concludes that no significant short-term or long-term adverse direct environmental impacts will result from the project as it relates to the environmental features discussed in this Environmental Assessment. This is because these features do not exist in the project area, the features exist but will not be adversely affected, or the impacts of construction will be temporary and well mitigated.

Because the proposed project is designed to correct deficiencies in the existing collection system, rather than providing additional wastewater capacity, this project, alone or in combination with other projects, is not expected to result in any significant indirect or cumulative short-term or long-term adverse environmental impacts.

The project will result in benefits to the human and natural environment because it will significantly decrease discharges from the combined sewer overflows, which will reduce the threat to public health from potential contact with sewage and improve water quality in Rock Creek. It will also eliminate the possibility of future sewer failure due to erosion of the creek bank.

J. Questions or Comments

For further information, please contact:

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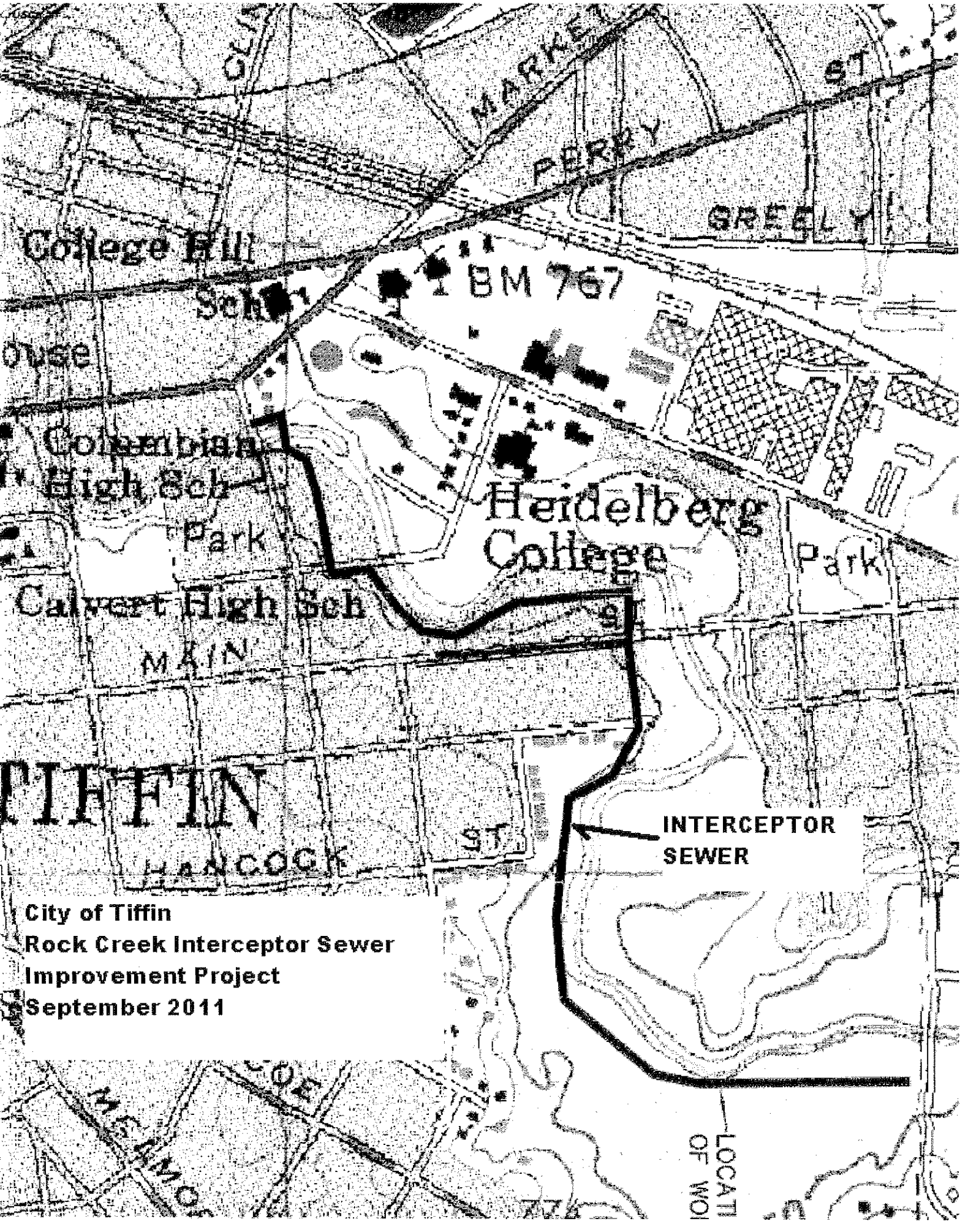

City of Tiffin
Rock Creek Interceptor Sewer
Improvement Project
September 2011