



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

August 22, 2018

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

**CITY OF SAINT CLAIRSVILLE
NEW RESERVOIR IMPROVEMENT PROJECT
FS390821-0001**

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 a general plan submitted by the entity mentioned above.

How were environmental issues considered?

The Water Supply Revolving Loan Account 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 general plan, as well as through the general 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 will not result from the action. Any adverse impacts have either been eliminated by changes in the general plan or have been reduced by the implementation of the mitigative measures discussed in the attached Assessment.

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?

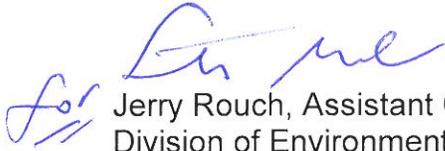
Any comments supporting or disagreeing with this preliminary decision should be submitted to me at the letterhead address. We will take no action on this general plan for 30 calendar days from the date of this notice in order to receive and consider any comments.

What happens next?

In the absence of substantive comments during this period, our preliminary decision will become final. The entity 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,



Jerry Rouch, Assistant Chief
Division of Environmental & Financial Assistance

Attachment

**ENVIRONMENTAL ASSESSMENT
For
City of Saint Clairsville**

**New Reservoir Improvement Project
Loan Number FS390821-0001**

**Applicant: Jim Zucal, Service Director
City of St. Clairsville
100 North Market Street
St. Clairsville, Ohio 43950**

Project Summary/Background

The City of Saint Clairsville (here forward referred to as St. Clairsville), located in Belmont County, owns, operates and maintains a potable water system that serves 2,422 customers and a population of 5,184. The system includes a 750,000 gallon per day (GPD) surface water-sourced drinking water treatment facility, pump stations, transmission lines, fire hydrants and multiple water storage tanks. Despite regular maintenance, an existing 89-year old raised water tank is beyond its functional life and needs to be replaced. In an effort to provide safe, potable and cost-effective drinking water to St. Clairsville's service area, and to better supply the water needs of a planned development area within the city, the proposed New Reservoir Improvement Project includes the replacement of the existing raised water tank. The proposed project (see Figures 1 and 2) would allow St. Clairsville to provide better water quality and ensure system pressures and fire protection to its customers. The project, to be financed in part through an Ohio Water Supply Revolving Loan Account (WSRLA) loan, has a total estimated capital cost of \$1,744,200. The approximate construction schedule is December 2018 through November 2019.

Existing Conditions

St. Clairsville water treatment and distribution system has 750,000 GPD design water capacity and an average daily demand of 400,000 gallons. The system also includes an interconnection with Belmont Public Water System for emergency flows. The proposed 95-acre development is located west of the Ohio Valley Plaza between Interstate 70 and U.S. Route 40. The development will be a mix of commercial, service and residential properties, and is expected to have an average daily demand of approximately 216,000 gallons. St. Clairsville has two elevated water storage tanks located closely together in the area of 100 N. Market Street, east of the development area. One tank is 500,000 gallons, of modern construction and in good condition, and the second, constructed in 1929, is beyond its functional life and needs to be replaced. St. Clairsville contracted with Pittsburg Tank and Tower Maintenance Company, Inc. to perform a maintenance inspection of the tanks in 2016, and extensive deficiencies were found that need to be addressed. The 89-year-old, 200,000-gallon tank is of multi-column elevated storage tank design, and is in critical need of extensive maintenance and repairs to allow it to remain functional. This work would include repairs to the tank's foundations and anchors, electrical grounding, installation of drain valves, installation of climbing guards, repairs to handrails, repairs to windage rods, replacement of the liquid level indicator system, replacement of the roof manway, installation of a water mixing system, installation of a passive cathodic protection system, abrasive cleaning and repainting of exterior surfaces, replacement of the tank's overflow pipe, replacement of the shell/roof access ladders and fall prevention system, and installation of interior ladders. Due to the age of the tank, the extent of the maintenance currently needed, and the need for substantial continued maintenance, continued use of this tank is not cost-effective, and has brought the tank to the end of its functional life. The need for the functional replacement of the aged tank,

along with the development's water flow needs centered in another area of town, resulted in the proposed New Reservoir Improvement Project locating the replacement storage tank in the area of the development project.

Alternatives Analysis

To address drinking water storage needs, St. Clairsville considered the following alternatives:

Alternative 1, a "no-action alternative," would maintain current practices and not adequately address the public health threat related to the deteriorated condition of the existing elevated water tank. This alternative has the potential to compromise water quality, allow structural failures, and leave St. Clairsville with inadequate pressure for fire protection and safe water pressure.

Alternative 2 involves extensive repairs to the existing elevated water tank. This tank is of an age and condition that repairs would not be cost-effective. Based on inspections of the tank and recommendations for its repair, extensive repairs and safety upgrades would be required. Furthermore, continual repairs to the tank would need to take place due to its age and condition. These repairs would continue to add to the expense of maintaining this structure and would eventually become unfeasible. This tank is also not in an optimal area to supply the water needs of a planned development area within another area of the city.

Alternative 3 involves construction of a 500,000-gallon, above-ground storage tank in the development area southeast of the existing tank. St. Clairsville's existing interconnection with Belmont Public Water System would also need to undergo operational improvements to ensure that emergency flows are available when fire protection conditions occur. This alternative includes demolition of the aged 200,000-gallon tank. The proposed project would allow St. Clairsville to provide better water quality, and ensure system pressures, storage volume, and fire protection to its customers in the proposed development area. It would also remove an aged elevated tank which is continually becoming a greater public health and safety threat due to deterioration of the structure, and which allows foreign material to enter the tank and contaminate the stored water. However, this alternative would also include a dependence on Belmont Public Water System for fire protection conditions. Should Belmont Public Water System have issues with water production or transmission, the project area of St. Clairsville would not have adequate flows for fire protection conditions.

Alternative 4 involves construction of a 500,000-gallon, above-ground storage tank, booster station and backup generator in a development area southeast of the existing tank. The interconnection with Belmont Public Water System for emergency flows would remain intact. This alternative includes demolition of the aged 200,000-gallon tank. The proposed project would allow St. Clairsville to provide better water quality, and ensure system pressures, storage volume, and fire protection to its customers in the proposed development area. It would also remove an aged elevated tank which is continually

becoming a greater public health and safety threat due to deterioration of the structure, and which allows foreign material to enter the tank and contaminate the stored water. This alternative would not leave St. Clairsville dependent on Belmont Public Water System for fire protection conditions.

Selected Alternative

Based on its effectiveness in addressing structural and water storage issues, providing safe drinking water and flows for fire protection to its customers in the proposed development area and system-wide, St. Clairsville selected Alternative 4. The project includes a 500,000-gallon glass-lined, above-ground storage tank, booster station, backup generator, piping, water connections, electrical work, and installation of an access drive and fencing. Following construction, demolition, removal and disposal of the existing, aged 200,000-gallon elevated storage tank will take place. The area of excavation for the new tank is on a vacant lot which has already undergone extensive grading related to waterline installation and road construction.

Implementation

The total estimated cost of the proposed project is \$1,744,200, and borrowing that amount over 20 years at the current market rate of 3.33 percent would cost St. Clairsville approximately \$2,383,000. However, St. Clairsville is expecting to receive a grant from the Community Development Block Grant (CDBG) program in the amount of \$800,000, and a grant from the Appalachian Regional Commission (ARC) in the amount of \$200,000 to assist in funding this project. Assuming St. Clairsville receives the CDBG and ARC grants that it has applied for, the outstanding balance for the project is \$744,200. St. Clairsville qualifies for the Small System Long Term WSRLA below-market interest rate on 20-year loans, which is adjusted monthly to reflect market conditions, and is currently 1.79 percent. Borrowing \$744,200 at 1.79 percent will save St. Clairsville approximately \$229,000 over the life of the loan compared to the current market rate of 3.33 percent.

Construction of the proposed project is estimated to begin late in 2018 and is expected to be completed in twelve months. The new above-ground storage tank, booster station and backup generator will be owned and maintained by the City of St. Clairsville.

Environmental Impacts

The project has the potential to affect the following features, but the effects will be reduced or mitigated to acceptable levels as explained below.

Surface Water: The majority of the project will not have significant adverse long-term impacts on surface water resources, as there will be no in-water work, no wetlands are present in the project area, and work will primarily be performed in an area in which the predominant cover is gravel and lawn grass. Minor, short-term impacts from the open-cut construction could occur. Excavation of the project area could be prone to erosion and deposition if construction mitigation is not followed. A Stormwater Pollution

Prevention Plan (SWPPP), which describes the measures that will be taken to prevent pollution caused by runoff into surface waters, is required. Dewatering of ground water to enable work below grade may be necessary, but engineering controls are part of the specifications to minimize the impacts of discharging pumped ground water to a river or stream.

Based on the above, the proposed project will not result in significant adverse impacts to surface waters.

Terrestrial Habitat and Endangered Species: The U.S. Fish and Wildlife Service (USFWS) indicates that the endangered Indiana bat and threatened northern long-eared bat can be found in Belmont County. However, the project does not include any tree clearing and trimming. Therefore, no impacts to these species are anticipated.

The species of concern eastern hellbender salamander can be found in Belmont County. However, the project does not include any in-water work, and the project will include adherence to a SWPPP. Therefore, no impacts to this species are anticipated.

The endangered running buffalo clover can be found in Belmont County. However, Ohio EPA, in coordination with USFWS, determined that the project location is not within the running buffalo clover's range. Therefore, no impacts to this species are anticipated.

The species of concern bald eagle can be found in Belmont County. However, they are not believed to be present in the project area. This is due to the project area's habitat (active construction activities, maintained lots, commercial lots) not being conducive to the species as described on USFWS webpages. Therefore, we have determined that the project may affect, but is not likely to adversely affect, the bald eagle.

Based on this information, the project will have no significant short-term or long-term adverse effect on terrestrial habitat or endangered species.

Air Quality: Belmont County is in attainment of the national ambient air quality standards (NAAQS) for ozone (smog), oxides of nitrogen (an ozone precursor), oxides of sulfur, lead, particulate matter and carbon monoxide. The operation of mobile construction equipment for this project will produce pollutant emissions in quantities too small, due to the limited scope and timeframe of construction, to place Belmont County out of attainment of the NAAQS. These emissions will be reduced through the use of emission control equipment and the use of fuels that produce lower emissions of particulates, oxides of nitrogen and oxides of sulfur.

Operation of the water booster station and backup generators are expected to contribute minimal additional pollution to the project area. However, this addition is expected to be negligible compared to ambient conditions in the project area.

Based on this, the project as designed will have no short- or long-term adverse impact on air quality.

Dust, Noise and Odors: These will be unavoidable but temporary effects of construction. Construction equipment noise and diesel odors will be controlled by the use of emissions equipment and mufflers. Dust will be suppressed as needed with water.

Operation of the drinking water booster station and backup generator will contribute minimal additional long-term noise to the project area. This noise is expected to be negligible compared to the ambient noise of the project area.

Operation of the drinking water booster station and backup generator will contribute minimal additional long-term odor to the project area. These odors are expected to be negligible.

Based on the above, the project will have no adverse impact on existing levels of noise, dust and odors.

Safety and Traffic: Construction will be located in a location with little to no traffic. However, movement of vehicles, equipment and supplies in and out of the project area has the potential to cause temporary traffic disruption and potential threats to public safety. Contract documents require contractors to implement standard traffic controls to minimize traffic disruption and public safety problems. For example, contractors are required to maintain access for emergency vehicles at all times, and utilize traffic direction devices such as flaggers, cones, and barricades. With these precautions, the project is unlikely to create significant traffic disturbance or threats to public safety.

Once construction is complete, the project areas will be restored and returned to pre-construction conditions. The project will not permanently alter traffic patterns. Therefore, the project will have no long-term change or adverse impacts on safety and traffic.

Archaeological and Historical Resources: Ohio EPA has concluded, based on the project's alignment, a thorough review of State Historical Preservation Office (SHPO) mapping data, prior disturbance within the project location, and the project location's steep grade, that no features listed on, or eligible for listing on, the National Register of Historic Places will be adversely impacted by the proposed project.

Based on this information St. Clairsville and Ohio EPA believe that unrecorded archaeological sites or properties eligible or listed on the National Register of Historic Places are not likely to be present.

In the event that archaeological properties are found during construction, contractors and subcontractors are required under Ohio Revised Code Section 149.53 to notify the Ohio State Historic Preservation Office (and Ohio EPA) and to cooperate with those entities in archaeological and historic surveys and salvage efforts when appropriate.

Local Economy: Debt for this project will be repaid from St. Clairsville's enterprise fund and permanent improvement fund. Water rates were raised in 2018 in anticipation of this project. The residential water bill in St. Clairsville will be \$75.27 per month, or \$903.21 per year, based on monthly water usage of 7,756 gallons. This is 1.65 percent of the median household income of \$54,706, which falls well within affordability guidelines.

Unaffected Environmental Features: No state-designated scenic rivers or state-designated or federally-designated wildlife areas are present in or near the work sites. No farmland losses are expected as a result of this project. The project is not located in the Lake Erie coastal zone. No sole source aquifers are present under the project.

Public Participation

This project has received extensive media reporting, as it is integral in development of the 95-acre site. The addition of potential grant monies to fund more than half of the project has increased public awareness and interest. Public feedback has been almost uniformly positive thus far. A public notice announcing the future availability of this Environmental Assessment will be posted on St. Clairsville and Ohio EPA – Division of Environmental and Financial Assistance websites. The public notice for the Environmental Assessment will be open for a 30-day public comment period. Thus, there have been adequate opportunities for information dissemination and public participation.

Conclusion

Based on the planning documentation, associated correspondence, and public participation, the proposed project as designed will have no adverse long-term effect on farmland, coastal zones, surface water, ground water, floodplains, wetlands, aquatic or terrestrial habitat, endangered species, state or federal wildlife areas, state-designated scenic or recreational rivers, cultural properties, air quality or the local economy. It will have no long-term adverse effects with respect to noise, dust and odors. It will have long-term benefits associated with the functional replacement of aging infrastructure, and the provision of a safe and adequate supply of potable water that is maintained according to the standards of the Safe Drinking Water Act and is capable of providing adequate and reliable water pressure to support the needs of residential customers and businesses throughout the project area.

For further information, please contact:

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Figure 1: General project area (in red).

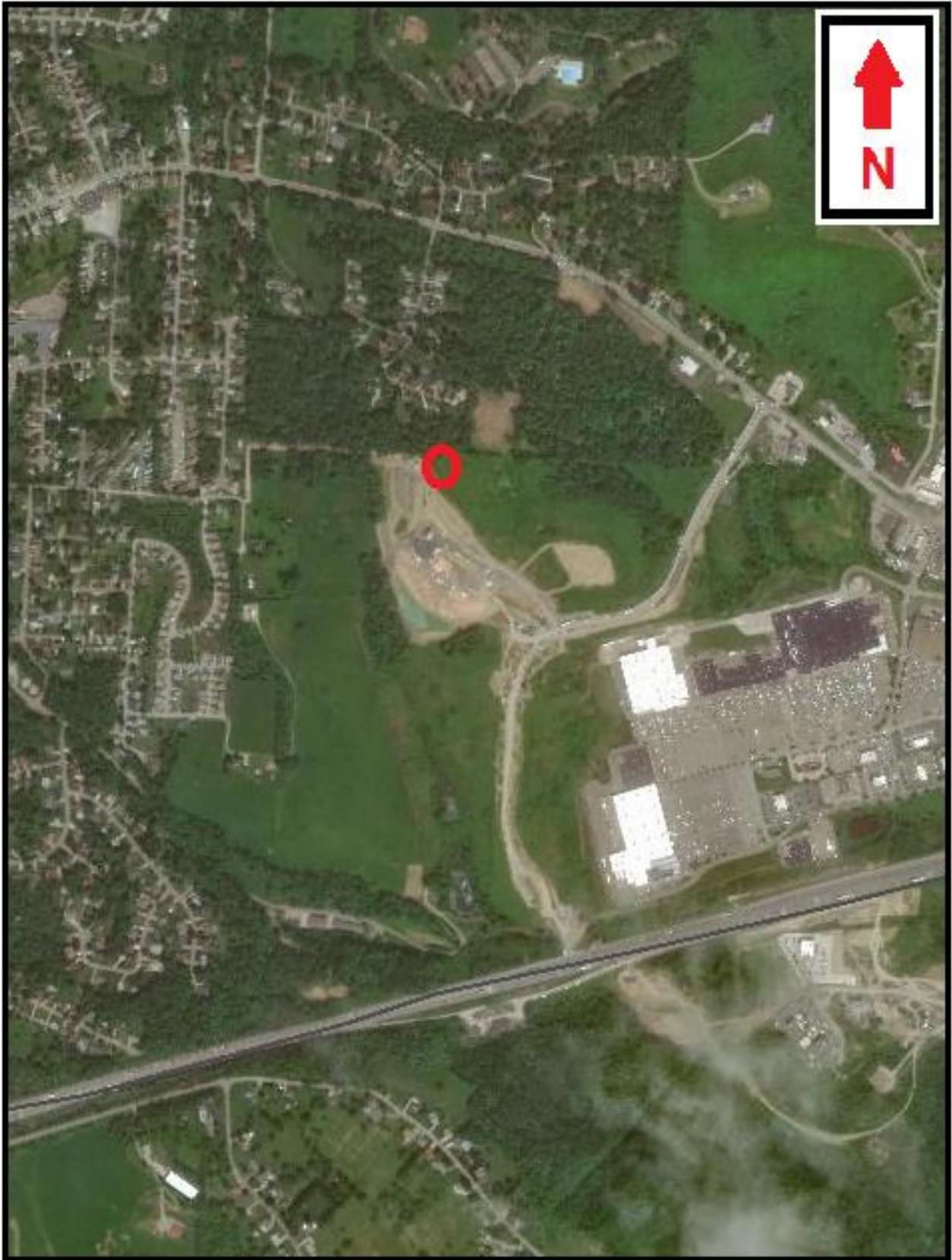


Figure 2: Project area.