**September 29, 2023**

**Limited Environmental Review and Finding of No Significant Impact**

**City of Newark – Licking County**
**South Second Street Interceptor**
**Loan number: CS390654-0026**

The attached Limited Environmental Review (LER) is for a wastewater collection and conveyance project in Newark 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 attached LER.

Upon issuance of this 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,

Kathleen Courtright

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

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**LIMITED ENVIRONMENTAL REVIEW**

## Project Identification

Project: South Second Street Interceptor

Applicant: City of Newark
34 South Fifth Street
Newark, Ohio 43055

Loan Number: CS390654-0026

## Project Summary

The City of Newark has applied for funding from Ohio EPA's Water Pollution Control Loan Fund (WPCLF) for the South Second Street Interceptor project. The project is intended to separate and replace aged and failing combined sewers and install new storm sewer to address Newark's long-term control plan (LTCP), and to reduce combined sewer overflows (CSOs)[1]. The total estimated loan for the project is $30,633,000, with construction scheduled to begin winter 2023 and be completed in 29 months.

## History & Existing Conditions

Located within Licking County, Newark's collection system service area encompasses roughly 9,000 acres and is primarily within the municipal city limits. Newark's collection system consists of approximately 200 miles of combined and sanitary sewers, and 16 sanitary lift stations. The Newark Wastewater Treatment Plant (WWTP) is located at 1003 East Main Street, adjacent to the Licking River. The collection system and treatment facility serve approximately 47,000 residential customers, as well as numerous commercial and industrial customers.

Combined sewers make up approximately 18 percent of Newark's collection system. Roughly 1,183 acres contribute surface runoff to the existing combined sewer system and subsequently to the CSO diversion structures. Four percent of Newark's sewers will be approaching the end of their useful life within the next 20 years. Recently Newark has adopted an integrated approach to address their aging combined sewers as part of their asset renewal program, in conjunction with providing CSO control. In response, Newark is replacing their aging combined sewers in the downtown area with new sanitary and separate storm sewers. In addition, Newark is constructing green infrastructure in many of the project areas to provide additional water quality benefits to the receiving stream.

[1] Combined sewer systems are sewers that are designed to collect rainwater runoff, domestic sewage, and industrial wastewater in the same pipe. Most of the time, combined sewer systems transport all of their flow to a sewage treatment plant where it is treated and then discharged to a water body. During periods of heavy rainfall or snowmelt the combined flow volume in a combined sewer system can exceed the capacity of the sewer system or treatment plant. For this reason, combined sewer systems are designed to overflow occasionally (combined sewer overflow) and discharge excess combined sewage directly to nearby streams, rivers, or other water bodies.

There are currently 27 CSO diversion structures with 22 outfalls that discharge combined overflows to Raccoon Creek, South Fork Licking River, and North Fork Licking River, as authorized by Ohio EPA. All but one of these CSOs are active in a typical year.

The WWTP is designed to treat an average flow of 8 million gallons per day (MGD) of wastewater, and the current treatment capacity is 26 MGD. Newark currently limits the flow at the influent of the WWTP to 20 MGD, diverting any additional combined flow to the High-Rate Treatment (HRT) facility that is located adjacent to the WWTP. Combined flow at the HRT receives screening and grit removal before being conveyed by gravity to an equalization (EQ) basin. The EQ basin has a capacity of 1 million gallons and has a junction chamber with an effluent isolation gate. The isolation gate modulates based on the influent flow to the WWTP, allowing flow from the EQ basin to drain back to the WWTP through the plant's main drain. If the EQ basin fills, an isolation gate at the HRT closes and the remaining combined flow downstream of the grit tanks receives full treatment through the HRT and subsequently discharges to the Licking River.

Newark submitted to Ohio EPA its Phase I Combined Sewer System Long Term Control Plan (LTCP) in September 1998 and the Phase I Combined Sewer LTCP Addendum in June 2004. The Phase I LTCP was developed by Newark to address the USEPA's requirements to treat or minimize CSO discharges. The addendum to the Phase I LTCP identified a plan to transport more wet weather flow to the existing WWTP and a physical/chemical high-rate system to treat the increased peak flows at the WWTP. This recommendation was accepted by Ohio EPA and a compliance schedule was included in the NPDES permit that became effective August 1, 2006, with a modification being effective December 1, 2007. Per the most recent National Pollutant Discharge Elimination System (NPDES) permit, Newark is required to prepare an LTCP Phase II. Newark submitted a draft of this plan to Ohio EPA in December 2016. The draft LTCP Phase II provided a prioritized, phased, and integrated approach for implementation of recommended projects to address Newark's remaining CSOs.

As part of the LTCP Phase II, Newark identified four priority asset renewal areas that include aging sewers, trunk sewers in most need of repair, maintenance issues, historic occurrences of surface flooding and water-in-basements, older water mains, and future plans for urban renewal.

The proposed South Second Street Interceptor project is identified as part of the Priority Area 2 in the LTCP II Integrated Plan Alternative. The northern portion of Priority Area 2 was already separated as part of the WPCLF-funded *City of Newark Downtown Sewer Separation Project* which stopped north of the G&W Railroad. The recommended work throughout Priority Area 2 includes the replacement of the existing 48-inch brick sewer with a new combined sewer, separating combined sewer inputs, and installing new storm sewer.

The WPCLF-funded *Fourth Street (Route 13) Sewer Separation Project,* which is identified as part of the Priority Area 1, is currently under construction and is located two blocks west of the proposed project area. The proposed project will continue to separate the combined sewers in the same neighborhood that were separated under the *Fourth Street (Route 13) Sewer Separation Project*. The Integrated Plan recommends work in Priority Area 2 that will ultimately reduce CSO 1013's number of overflow events and the overflow volume in a typical year.

## Project Description

The proposed project (see figures 1 and 2) is designed to address Newark's LTCP and to reduce CSO, by replacing aged, combined sewers, installing new storm sewers, and replacing an existing CSO structure. The proposed project will include the following components:

The replacement combined sewer, to be constructed on South Second Street between East Walnut Street and Ohio Street, will collect sewage from sanitary and combined sewers within the project area. To ensure capacity is provided beyond that of the existing sewer, the proposed sanitary pipe will be sized at 42-inch diameter. A 42-inch combined sewer also provides the most protection from street flooding and is large enough to comfortably handle flows in the near-term, future-term, and future-term maximum separation conditions.

The new storm sewer will continue to receive the current combined flows from the 16 North and Downtown Renovations project areas in the near-term condition. The city is planning to further separate the 16 North and Downtown sewers. In near term, the storm sewer will flow into the new combined sewer. There will not be overflow events under the dry weather condition. Once all the upstream sewer separation projects are complete, the new combined sewer will only convey sanitary sewer flows and the new storm sewer will convey strictly stormwater inputs. The proposed storm sewer will be sized at 60-inch diameter. A 60-inch storm sewer provides sufficient capacity in the near-term, future-term, and future-term maximum separation conditions to convey all stormwater flows to the South Fork Licking River without surcharging.

The existing CSO IO13 structure will be demolished and a new CSO 1013 will be constructed on the dry side of the levee. The new CSO 1013 structure will give the city the opportunity to integrate specific features that will allow easier and more efficient operation of the flood control system by the city.

Work also includes restoration of sewer service connections, water line replacement, and restoration of pavement, drives, and curbs. Construction activities will include open cut installation in previously disturbed rights-of-way (streets, sidewalks, driveways, areas of buried utilities that otherwise support no wetlands, forested areas, or aquatic habitat).

## Implementation

The total estimated loan amount for the proposed project is $30,633,000, all of which the City of Newark proposes to borrow from the Ohio Water Pollution Control Loan Fund (WPCLF). The project qualifies for the standard WPCLF below-market interest rate on 30-year construction loans, which for October is 3.08 percent (WPCLF loan interest rates are set monthly, and the rate may change for this loan). Borrowing at 3.08 percent will save Newark approximately $8,200,000 over the life of the loan compared to the current market rate of 4.38 percent.

Newark will recover debt associated with the project with revenue generated by monthly sewer fees. The 2023 monthly residential sewer rate in the project area is $32.61 ($391 annually). This is 0.81 percent of the median household income of $48,609, as compared to the state average of 1.3 percent.

## Public Participation

The City of Newark has held various public meetings to notify residents and businesses about the project, including virtual meetings, meetings with affected businesses, meetings to discuss temporary effects on parks, and meetings with the local civic association. Additional notifications will take place shortly after issuance of a construction Notice to Proceed, and a public notice announcing the availability of this Limited Environmental Review will be posted on City of Newark and Ohio EPA Division of Environmental and Financial Assistance websites. Thus, there have been adequate opportunities for information dissemination and public participation.

## Conclusion

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

*Will have no adverse environmental effect, will require no specific impact mitigation, and will have no effect on high-value environmental resources,* as there are no known sensitive environmental resources within the proposed project area. The proposed work will take place within urban areas, in which the predominant cover is pavement and lawn grass, with extensive development and prior excavation. Mitigation measures include typical erosion control and construction best management practices.

*Is cost effective,* as the proposed action was evaluated as the most cost-effective alternative to improve wastewater storage and conveyance within the existing system.

*Is not a controversial action,* as there is no known opposition to the proposed project and the cost of the project is not overly burdensome to ratepayers.

*Does not create a new, or relocate an existing, discharge to surface or ground waters, and will not result in substantial increases in the volume of discharge or loading of pollutants from an existing source or from new facilities to receiving waters,* since the project involves improvements to and replacement of infrastructure to address Newark's LTCP to reduce CSOs and exposure to the discharge of untreated or partially treated effluent.

*Will not provide capacity to serve a population substantially greater than the existing population,* since the project is not related to serving new growth or increasing capacity at the wastewater treatment facilities.

In summary, 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 water, ground water, air quality, floodplains, wetlands, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, federal or state-designated wild, scenic or recreational rivers, federal or state-designated wildlife areas, or threatened or endangered species). Typical construction impacts, such as noise, dust, and exhaust fumes, will be short-term and addressed through the use of standard construction best management practices.

The proposed project is a cost-effective way to address necessary improvements within an existing, aged wastewater collection system. Once implemented, the project will help Newark improve its wastewater collection system by replacing and upsizing aged infrastructure, reducing public and environmental health risks related to the discharge of and exposure to untreated wastewater through combined sewer overflows, in turn improving water quality in the Licking River. Also, by using WPCLF low-interest financing, Newark has minimized the project cost.

**Contact information**

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**Figure 1: General Project Area**


**Figure 2: Specific Project Area**