Ohio Environmental Protection Agency

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

March 30, 2018

Notice of Reaffirmation of a Limited Environmental Review and Final Finding of No Significant Impact to All Interested Citizens, Organizations, and Government Agencies

City of Girard, Trumbull County, Ohio
Wastewater Treatment Facility (WWTF) Peak Flow Treatment and
Equalization Improvements Project: Combined Sewer Overflow (CSO) Initiative
Loan No.: CS390391-0004

The purpose of this notice is to advise the public that Ohio EPA has reviewed the referenced project and reaffirms that neither an Environmental Assessment (EA) nor a Supplemental Study (SS) is required to complete the environmental review of the project. Instead, the proposed, modified project continues to meet the criteria for a Limited Environmental Review (LER), as originally issued on December 21, 2017. These criteria are summarized below in this document and in the attached LER.

The Water Pollution Control Loan Fund (WPCLF) program requires the inclusion of environmental factors in the decision-making process for project approval. Ohio EPA has done this by incorporating a detailed analysis of the environmental effects of the proposed, modified action in its review and approval process. Environmental information was developed as part of the facilities planning process. A subsequent review by this Agency has found that the modified action still does not require the preparation of an EA or an SS.

Our environmental review concluded that because the proposed, modified project continues to be limited in scope and meets all applicable criteria, an LER is still warranted. A redesign was needed when as-bid costs exceeded the engineer's estimate by more than 10%. Specifically, the proposed, redesigned project still constitutes an action in a sewered community which is for minor upgrading and/or minor expansion of existing treatment works including, but not limited to, functional replacement of existing mechanical equipment or structures, and construction of new ancillary facilities adjacent or appurtenant to existing facilities. As such the City of Girard's recently redesigned project constitutes an activity still meeting these criteria.

Furthermore, the proposed project still:

- is cost-effective;
- will have no effect on high value environmental resources;
- has no potential for associated significant adverse environmental impacts;
- does not require extensive impact mitigation unique to the assistance proposal;
- is not the subject of significant public interest or controversial;
- will not create a new, or relocate an existing, discharge to surface or ground waters, or cause pollution of surface or ground waters;
- 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; and
- will not provide capacity to serve a population substantially greater than the existing population.

Maps depicting the location of the proposed, redesigned project are included as part of the LER. The LER presents additional information on the modified project, its costs, and the basis for our decision. Further information can be obtained by calling or writing the contact person named at the end of the LER.

The LER was completed for the redesigned project as it still will not individually, cumulatively over time, or in conjunction with other Federal, State, local, or private actions have a significant adverse effect on the quality of the human environment. Consequently, a Finding of No Significant Impact (FNSI) now can be issued for the proposed project.

Upon issuance of this FNSI determination, award of funds may proceed without being subject to further environmental review or public comment, unless information is provided which determines that environmental conditions on the proposed project have changed significantly.

Sincerely,

Jerry Rouch

Jerry Rouch, Assistant Chief
Division of Environmental and Financial Assistance

JR/KH

Attachment

LIMITED ENVIRONMENTAL REVIEW (LER)

Date: March 30, 2018

A. Project Identification

Name: City of Girard
Wastewater Treatment Facility Peak Flow Treatment and
Equalization Improvements Project
Combined Sewer Overflow Initiative Program

Address: Mr. Jerry Lambert, Director of Public Service
City of Girard
100 West Main Street
Girard, Ohio 44420

Loan No.: CS390391-0004

B. Existing Need

The City of Girard owns and operates a wastewater collection and treatment system consisting of two major parts: a combined sewer system (CSS) with approximately 215,000 lineal feet (40.7 miles) of combined sewers serving roughly 3,695 acres of drainage area, and a wastewater treatment facility (WWTF). The city's CSS is subject to one known remaining combined sewer overflow (CSO #003) located south of the city's WWTF. In addition, the city's CSS receives sanitary sewer flows from two separate satellite sewer systems serving parts of Trumbull County adjacent to Girard. These areas are known as the Hubbard-Liberty Sanitary Sewer Subdistrict (SSSD) Number 3 and the Weathersfield SSSD Number 1. Some of these separate sanitary sewers in the township areas, as well as within the newer parts of the city, are likely subject to excessive infiltration/inflow (I/I).[1] The addition of the two Trumbull County separate satellite sewer systems to Girard's service area brings the drainage area served by Girard's WWTF to 5,170 acres as shown in Figure 1.

Girard's WWTF currently includes multiple components that process the wastewater originating within its service area. They include the following major wet stream process components or equipment: bar screen, influent pumping, flow equalization, grit removal, pre-aeration, primary clarification, trickling filter biological treatment, secondary clarification, chlorine disinfection, and dechlorination (sodium bisulfite). In addition, the facility has an unpermitted, internal secondary bypass after primary clarification. The

[1] Combined sewers normally carry only sanitary sewage in dry weather and convey both sanitary and storm flows during wet weather. I/I is defined as extraneous, clear water that enters a sanitary sewer system through surface or subsurface locations. 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. Inflow may include clear water entering the system through manhole covers, roof or foundation drains, direct storm sewer connections, etc.

bypassed flow is recombined with fully treated wastewater in the chlorine contact tank prior to discharge to Little Squaw Creek. The WWTF facilities also include the following sludge handling processes and equipment: primary and secondary anaerobic digestion, digested sludge holding, and dewatering via a belt filter press. Polymer is utilized as a dewatering aid. The dewatered sludge is hauled to a licensed landfill for disposal. Upon completion of the treatment processes, discharge of the final effluent to Little Squaw Creek, a tributary to the Mahoning River which is culverted for the 1600 or so feet between the WWTF and the Mahoning River, occurs. During wet weather, the remaining CSO (#003) regulates the allowable flow to the WWTF's headworks.

According to the city and its engineering consultants, the primary treatment units went into operation in 1960, while the secondary treatment components went into service in 1987. Many of these treatment facilities are nearing the end of their useful life and/or cannot provide the hydraulic capacity needed to handle the wet weather conditions that the city's CSS experiences on a regular basis. The Girard WWTF has an average daily flow capacity of 5 million gallons per day (mgd) and a peak flow capacity of approximately 7.2 mgd. The city's facilities planning documents (No Feasible Alternatives studies and WWTF Basis of Design Report) indicate that the WWTF's peak capacity ultimately needs to be increased to 12 mgd through the construction during this project of two, earthen equalization basins with a combined capacity of 2.4 million gallons. Additional improvements to the existing WWTF components and CSO Station #003 (shown below) are needed to provide this same wet weather peak treatment capacity, and are proposed to be completed as part of this project. Figure 1 below shows the facilities planning area for the City of Girard's WWTF.

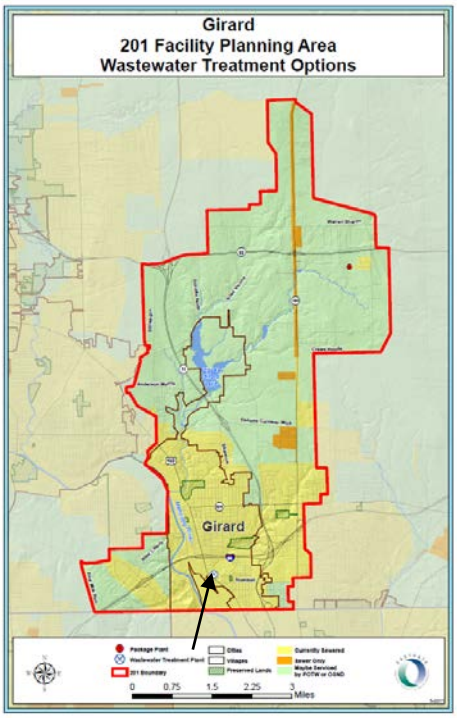

Figure 1, City of Girard WWTF Facilities Planning Area Map

While conditions within the city's collection system (including the fact that 35.4% of it is estimated to be combined and the remainder consists of separate sanitary sewers) have influenced the planning and design of the project discussed in this document, they are not specifically addressed here. For that reason, this document focuses mainly on the city's two main lift stations, CSO Station #003, the Girard WWTF, and how the project will affect the estimated 20,000 residents of the city's WWTF service area shown as yellow in Figure 1, which includes the City of Girard and surrounding unincorporated areas in Liberty, Vienna, and Weathersfield townships in Trumbull County.

Figure 2 below shows the boundaries of the Trumbull County areas that are served by Girard's WWTF, while Figure 3 shows the location of the city's collection system and WWTF located at 945 South State Street in Girard and discharging to River Mile 0.37 of Little Squaw Creek. A very small portion of southern Girard is served by the City of Youngstown.

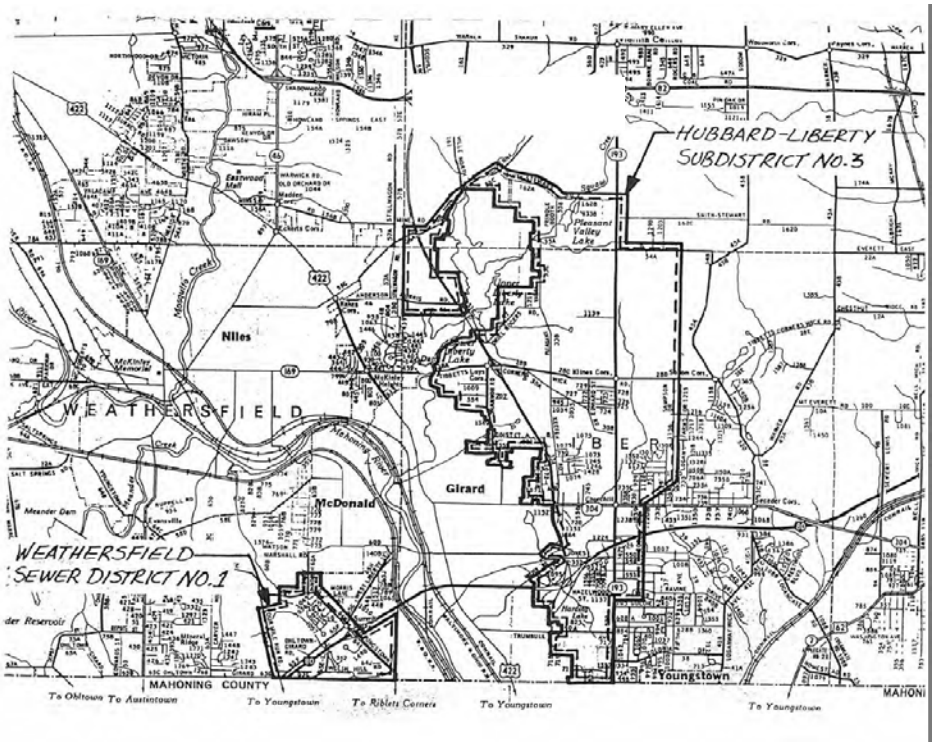

Figure 2, Trumbull County Sanitary Sewer Subdistricts

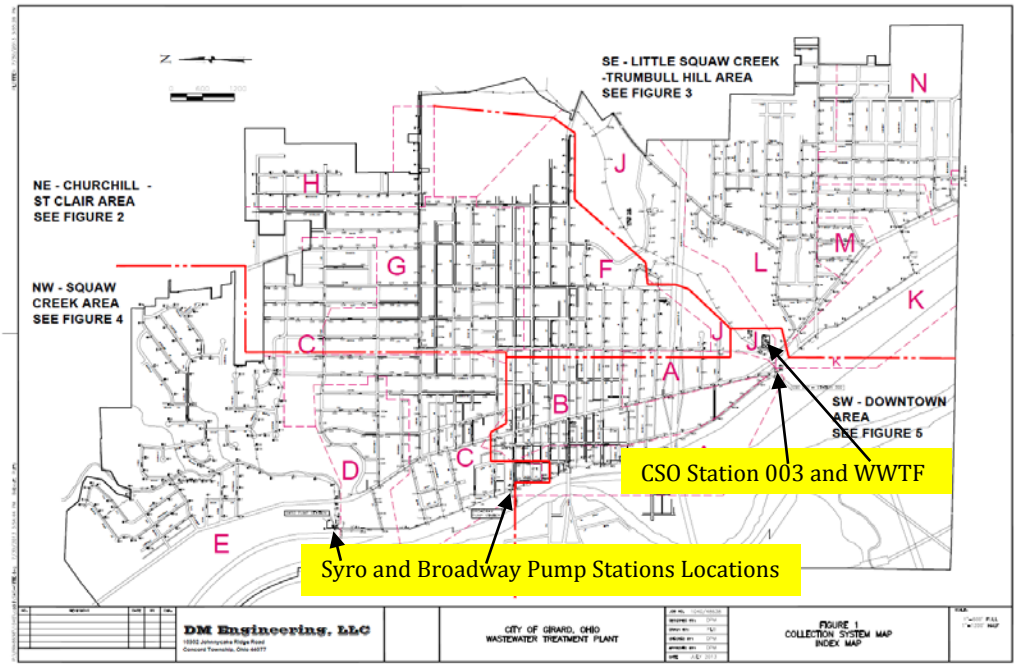

Figure 3, City of Girard and Vicinity Collection System Map

Based on the city's National Pollutant Discharge Elimination System (NPDES) permit, No Feasible Alternatives study, and Basis of Design Report prepared by the city's engineering consultants in the past three years, the city decided to make major improvements to its publicly owned treatment works with Water Pollution Control Loan Fund (WPCLF) financial assistance from Ohio EPA over the next two years (21 months for construction). These improvements are described in more detail in the next section.

C. Project Description

After completing its alternatives analysis discussed above, the city decided to make major improvements to its Publicly Owned Treatment Works' (POTW's) components. These proposed improvements include work on four POTW facilities. The first two improvements entail work at the city's Syro and (West) Broadway wastewater pump stations (see Figure 3 above). According to the city, the proposed improvements to these two facilities will be limited to internal upgrades to the individual structures, including replacement of the 30-year old pumps and valves, new electrical gear, and updated Supervisory Control and Data Acquisition (SCADA) monitoring equipment, including flow meters and wet well level monitoring and process controls. Both pump stations will also have the existing screening and debris removal equipment removed and replaced with chopper pumps. In addition, the Broadway Pump Station's influent flume and odor control system will be modified. The Syro Station is located off North State Street just north of Squaw Creek. The Broadway Pump Station is located at the west end of Broadway Avenue adjacent to the Mahoning River.

The third set of improvements will occur at CSO Station 003 (see Figure 4 below) and includes improving the WWTF's raw influent wet well and pumping capacity, and resetting

the weir to a higher elevation. According to the city's consulting engineer, "when pumping capacity is exceeded, the level in the wet well can rise high enough to cause the influent sewers to surcharge and overtop the internal bypass weir located at the CSO station. The limiting factor on the ability of the Girard WWTF to minimize CSO events is therefore the raw wastewater pumping capacity. This pumping capacity also establishes the peak rate of flow through the plant that must either be treated or stored immediately and then returned for future treatment when the rain event is over."

Figure 4, CSO Station 003 Photo

To help address this situation at CSO Station 003, the city has proposed to make the following improvements to its WWTF as the fourth major part of this project:

- New Raw Wastewater Pumping Equipment and Building,
- New Preliminary Treatment Equipment,
- Renovations to Pre-aeration and Primary Settling Tanks,
- Modifications to Existing Trickling Filters and One New Trickling Filter,
- Modifications to Existing Final Settling Tanks and One New Settling Tank,
- Renovations to the Existing Retention Basin,
- New Flow Equalization Basins,
- New Disinfection Equipment, and
- New Solids Handling Pumps and Related Equipment.

More specifically, these improvements will include increasing the peak, wet weather WWTF capacity to 12 mgd, and constructing two new earthen equalization (EQ) storage basins with capacities of 1.4 and 1.0 million gallons. Modifications and additions to the city's WWTF components will entail a new 1-3/8" bar screen; new influent pumps, valves, and piping with a 22 mgd capacity; two new influent magnetic flow meters; a new perforated

plate fine screen; a refurbished detritor (grit tank) and new grit pumps; new pre-aeration blowers; replacement of sludge and skimming systems on the primary settling tanks; a chemical polymer feed system to enhance settling in the existing primary clarifiers; a third trickling filter; new media for the two existing trickling filters; a third final settling (secondary) clarifier; new sludge skimmers for the two existing clarifiers; renovation of the existing flow retention or EQ basin; renovation of the existing flow retention or EQ basin; new EQ basins and equipment to handle flows over 1.1 million gallons; conversion of the existing chlorination and dechlorination facilities to ultraviolet (UV) light disinfection (this unit was downsized from 22 mgd to 12 mgd during the redesign); and modification of sludge tanks, digestors (new mixers), other process components, and new transfer pumps to deliver sludge in a batch-type process to the existing anaerobic digesters for treatment and storage. The existing primary WWTF bypass will have a new downward opening weir gate that will maintain a maximum flow rate of 12 mgd to the primary clarifiers. See Figure 5 below. Expanded electrical, instrumentation, controls, and SCADA systems are also proposed as part of this project.

Other work proposed as part of this overall project is expected to include mobilization; minor, miscellaneous demolition; sheeting, shoring, dewatering, and excavation; temporary dewatering; storm water pollution prevention; equipment/system start-up and testing; and demobilization.

According to the city, these improvements to its wastewater facilities are meant to handle the city's existing and expected 20- to 50-year wastewater needs in the entire facilities planning area shown in Figure 1. All the proposed WWTF improvements that are the subject of this document will be made within prior disturbed areas where the main vegetation is grass and individual trees that need to be cut down, or within existing POTW units. By completing this proposed project, Girard expects to have a more reliable means of handling its wet weather flows at its WWTF. In turn, this should also help reduce the activation of the remaining CSO (#003) in the city's collection system and reduce, if not eliminate, the unpermitted bypassing within the WWTF. Restoring the project areas to their existing (or better) condition after construction is completed is an additional component of this proposed project.

Other planned improvements to Girard and Trumbull County's collection systems include purchasing a close-circuit television (CCTV) van for improving the city's maintenance of its combined sewer system.

The engineers' estimate of the city's proposed wastewater improvements project, including contingencies, is $20,314,959, of which approximately $16,084,400 is the amount for construction, $125,000 is for the purchase of a CCTV van, and $30,000 is for reimbursement of the costs incurred to purchase the property needed for the WWTF improvements. At present, the city pays Trumbull County for use of its CCTV equipment, and has decided that it would be more cost-effective to have its own. All prior incurred planning and design costs ($1,751,471), and future engineering services costs ($1,108,200) are included in this total cost figure. A loan fee of $72,409 and a contingency estimate of $943,599.45 makes up the balance. A blended interest rate of 0.40% is currently expected to be used to finance this proposed project based on as-bid total project costs of roughly $21.6 million. This interest rate will be available for loans awarded through April 30, 2018.

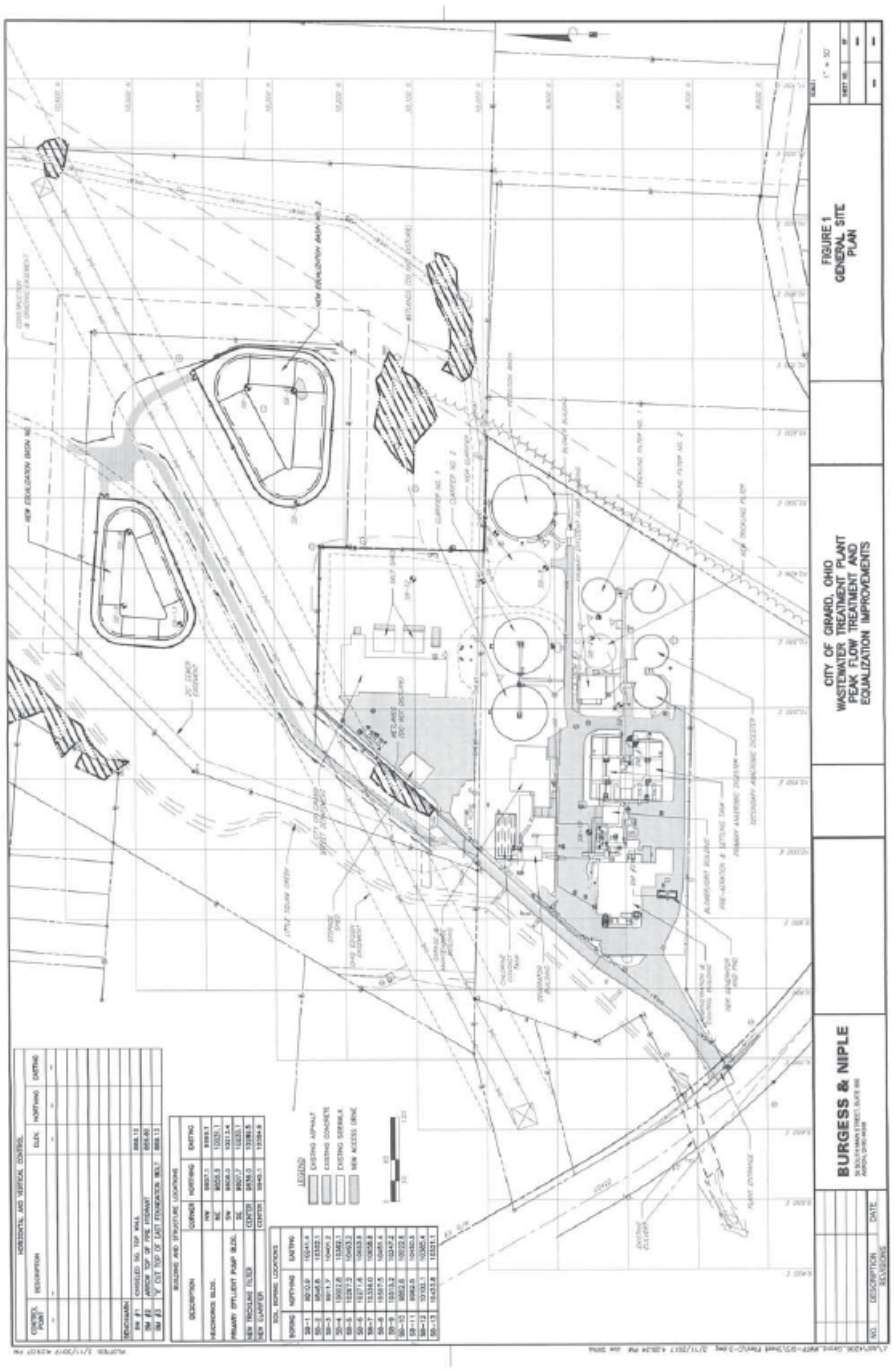

Figure 5, WWTF Improvements Overview: Will Affect 3.9 Acres of 12.5 Acre Site Total

D. Limited Environmental Review (LER) Criteria

Because the proposed project meets certain minimum conditions, and will not individually, cumulatively over time, or in conjunction with other federal, state, or private actions have a significant adverse effect on the quality of the human environment, an LER is warranted.

More specifically, these conditions cover actions in sewered communities that are for minor upgrading and/or minor expansion of existing wastewater treatment works. In this instance, converting certain existing treatment components to new uses, adding new treatment components adjacent to the current WWTF, replacing equipment within existing structures, and improving an existing dirt road to serve as a temporary haul road during construction and then as a permanent access road will entail the bulk of the work at the POTW sites shown in Figures 3-5. As all the proposed improvements will be limited to previously-disturbed locations, the proposed twenty-one-month long construction period for this project in Girard is expected to result in no short- or long-term adverse environmental impacts.

The proposed project meets the following, specific criteria for a LER:

1. **The proposed project has no potential for associated significant adverse environmental impacts and will have no effect on high value environmental resources.** Given the proposed project's limited scope, placement within a previously-disturbed location within an urbanized area, and the absence of any notable above-ground natural features within the immediate project areas shown in Figures 3-7, the proposed project will not result in any adverse environmental impacts. This conclusion is validated by the reviews completed by Ohio EPA and federal, state, and other governmental agencies. The known features of the project area and the city's approach to addressing them are discussed in more detail below.

   Ohio EPA consulted with Ohio Department of Natural Resources (ODNR) during the project review and determined that the proposed project will have no effect on important natural resources, such as floodplains or other natural features. This conclusion was reached primarily because a flood hazard elevation study completed for this project in October 2016 determined that the base flood elevation for Girard's WWTF site is 864.32 feet above mean sea level and that all existing and proposed POTW facilities will be adequately protected from a 100-year flood of Little Squaw Creek. As well, none of the proposed improvements or construction activities will encroach onto either Little Squaw Creek's or the Mahoning River's floodway (see Figure 6 below).

   In addition, Girard has committed to avoiding significant wooded areas, wetlands, or other areas of native vegetation present within the project area. In part, this will be accomplished by setting aside thirty of the thirty-six acres acquired for the wet weather upgrade of the city's WWTF as a future park. The two proposed equalization basins to be constructed on six acres during this project will be located on an area that is composed of approximately fifteen feet of fill material moved to the site during nearby (Interstate 80) highway construction and that has revegetated naturally during the past forty years. As such, although the site now supports wetlands (see Figure 7), it is not an undisturbed, natural site. Accordingly, the city's environmental impact mitigation should address these concerns, including removal of four trees outside of when bat species are known to be present, site clearing for the equalization basins, and a crossing of a small section of a prior culverted stream during the two-year construction period. As a result, no significant adverse environmental effects will occur either because significant natural features

are generally absent from the project area, or specific provisions to avoid and minimize construction-related impacts to the area's floodplain and wetlands are included in the project's contract documents.

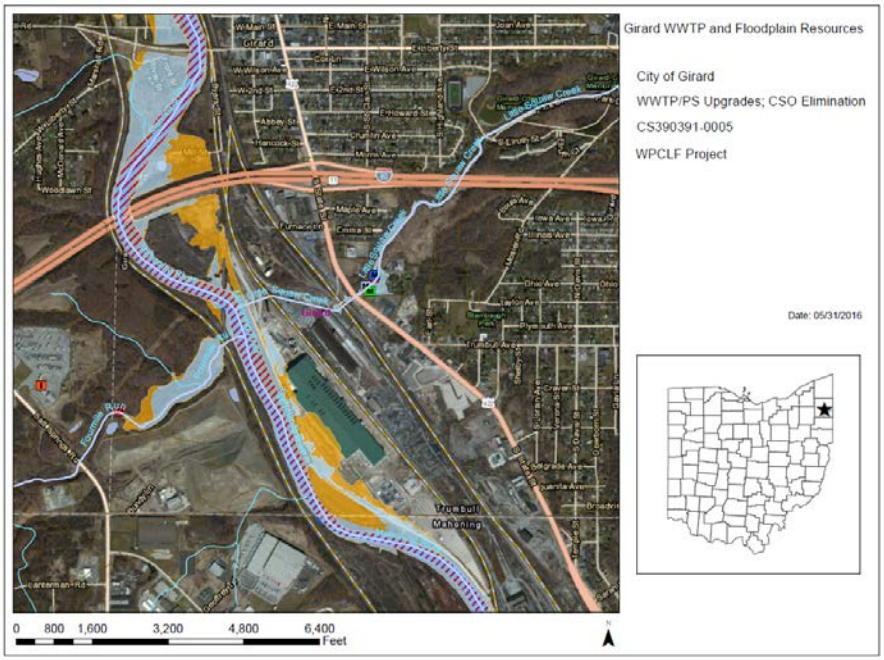

Figure 6, Girard WWTF and Floodplain Resources

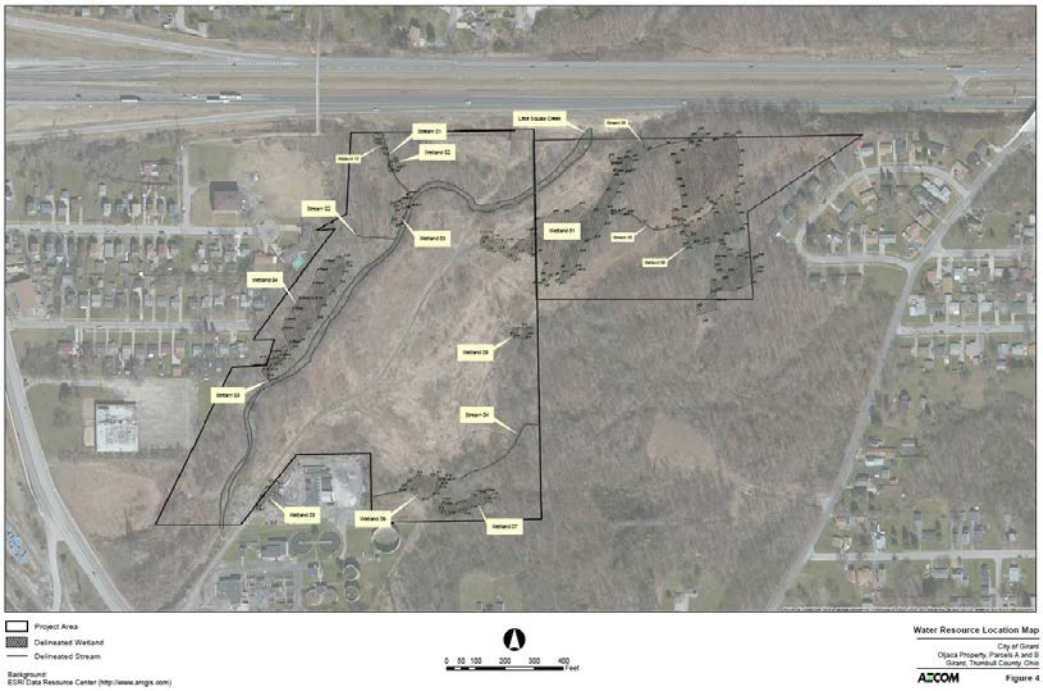

Figure 7, Wetlands and Stream Resources in WWTF Project Area

2. **The proposed project will not require extensive impact mitigation unique to the assistance proposals.** The proposed work to complete this project is straight-forward and does not require any extensive mitigation of environmental impacts, as all the WWTF improvements will be made within previously-disturbed areas (as shown in Figure 3-7). In that regard, moderate amounts of earth-moving activity are associated with the two equalization basins and related WWTF improvements, so that only routine environmental impact mitigation in the form of a storm water pollution prevention plan, standard soil erosion and sedimentation controls, spill control, dust control, vehicle emission and traffic controls, and adherence to prohibited construction activities is necessary. To address potential Ohio EPA concerns about off-site disposal of excess material excavated during construction activities (estimated at 5,000 cubic yards), Ohio EPA has reviewed and prior approved a spoil disposal location for this activity, followed by grading and seeding with grass. This is to avoid any significant adverse off-site impacts such as from any placement of excavated material or other fill in sensitive areas not previously approved by Ohio EPA for that purpose.

3. **The proposed project is cost-effective and not the subject of significant public interest.** In comparison to the treatment alternatives considered during project planning, the selected upgrades using existing components and two new equalization basins were chosen by Girard as more cost-effective on the basis of costs and non-monetary factors. Also, the cost of transporting and treating the wet-weather wastewater flows that originally were discharged to the environment without treatment has been shown to be less than the cost of performing I/I removal work in the collection system. Moreover, the proposed improvements constituting this project are non-controversial because they will not adversely impact the environment, or the residential rates paid for wastewater. Please see the Project Implementation (Section E) and the Estimated Project Costs and Proposed Project Schedule (Section F) parts of this document following this section.

   Information on the city's public participation activities is presented below.

4. **The proposed project will not create a new, or relocate an existing, discharge to surface or ground waters, or cause pollution of surface or ground waters. It will also not create a new source of water withdrawals from either surface or ground waters, or significantly increase the amount of water withdrawn from an existing water source.** The proposed project will not result in either new, relocated, or additional discharges of wastewater to either surface or ground water on a permanent basis. Rather, the purpose of the proposed project is to ensure that wastewater flows which currently are being released to the environment without treatment or bypassed during wet weather are properly handled. Part of the reason for this finding is that the proposed project will improve the operation of the city's WWTF and enable it to better comply with its permit to discharge treated wastewater to Little Squaw Creek and the Mahoning River. Significantly, no changes to the city's existing National Pollutant Discharge Elimination System (NPDES) permit covering its WWTF, to the WWTF's effluent outfall location, or to the amount of pollutants discharged to local surface water resources through population growth are expected in response to this project.

Similarly, the fact that this project involves making improvements designed to meet current wastewater engineering standards and the city's 20- to 50-year wastewater treatment needs also supports our conclusion that this project does not involve creation of a new, or support expansion of an existing, source of water withdrawn from either surface or ground waters. The average daily flow rating for the city's WWTF will continue to be 5.0 mgd during dry weather.

5. **The proposed project 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.** As noted above, the proposed improvements to Girard's POTWs are not designed to facilitate future growth in or around the city, but rather to address the city's regulatory responsibilities under the Clean Water Act. On this basis, the proposed project will not result in any net increase in the volume of discharge or the loading of pollutants from the Girard WWTF and its collection system, or permitted to be discharged under the city's NPDES permit. Rather, flows which currently bypass parts of the city's WWTF or overflow through CSOs will be properly handled and discharged.

6. **The proposed project will not provide capacity to serve a population substantially greater than the existing population**. Based on information provided by the city during planning, Girard and vicinity (see Figure 1) have experienced declining populations. The flows currently being processed at Girard's WWTF during dry weather are indicative of this pattern, when compared to the original design capacity. In addition, the two purposes of this project are to replace the POTW components which have come to the end of their useful life and to address peak, wet weather flow conditions, not future growth. On this basis, the proposed project and the population they are expected to support should have no effect on environmental attributes that are typically affected by growing populations. For example, it will not adversely affect the current full attainment status of Trumbull County for the six priority air pollutants.

E. Project Implementation

To implement the proposed project described above, the City of Girard intends to finance the improvements to its POTW facilities through a low-interest loan from Ohio EPA's WPCLF. Currently, the thirty-year WPCLF standard interest rate is 2.21%. This fixed interest rate is adjusted monthly to reflect changing market conditions. For projects meeting the WPCLF's CSO Initiative criteria, an interest rate of 0% is available to city's like Girard, not to exceed $13 million per borrower over the next two years (through 2019). A 1% interest rate is expected to cover the $8 million balance, for a blended interest rate of 0.40% pending completion of the bidding process.

Given the 7% to 21% wastewater rate increases previously enacted by Girard's city council for 2013-2017 and that it has authorized the city's director of public service to adjust rates in future years, the city expects that the resulting revenues from rate payment will cover the costs of its wastewater operating and improvement/replacement accounts. Accordingly, under this configuration, no other rate increases are planned to pay for this individual project. By 2019, the city estimates that its monthly wastewater fee will increase by 2%

from $7.51 to $7.66 per 1000 gallons of water usage. Assuming the project funding presented above, Ohio EPA expects that the city will save about $12.2 million when compared to a market-rate loan of 3.51% on the total project costs of between $20.31 and $21.6 million. By proposing to fund its project in this way, Ohio EPA anticipates that the City of Girard should be able to generate enough revenue under its current and proposed water rate structure to continue to own, operate, and maintain its wastewater collection and treatment systems well into the future.

F. Estimated Project Costs and Proposed Project Schedule

Currently, the engineers' total estimated project cost for the proposed POTWs improvements described above is between $20.31 and $21.6 million. To pay for these improvements and related planning, design, and inspection costs, Girard expects to blend a 30-year, 1% hardship interest-rate loan with a 0% CSO initiative discount from Ohio EPA's WPCLF program.

Under the wastewater rates effective in December 2017, a typical, in-city residential customer using on average 3,634 gallons (486 cubic feet) per month currently pays a fee of $27.29 per month, or $327.48 a year. This current fee is expected to reach $27.84 monthly and $334.08 annually in 2019. When expressed as a percentage of the service area's latest median household income (MHI) figure of between $37,426 (Girard) and $43,252 (Liberty Township), this future annual fee is about 0.89% of the area's MHI, and thus is considered generally affordable for an average residential water customer of Girard's POTWs. As noted earlier, wastewater rates are expected to continue to increase following the city's previously adopted schedule through at least 2019, to cover the costs of planned capital improvements. Given the financial information presented above, no significant adverse economic impacts on the local residential users of Girard's treatment works are anticipated. Any future wastewater fund deficits will be corrected by the city's director of public service implementing a consumer price index (CPI) adjustment as authorized by city council in perpetuity.

Under the city's proposed project schedule, WPCLF funds are expected to be awarded in April 2018, so that construction can commence soon thereafter. The city estimates that construction will be completed in twenty-one to twenty-four months.

G. Public Participation and Notice

According to the city, the public was provided with opportunities at multiple city council meetings to learn more about Girard's POTW project. The first was an October 2014 city council meeting when the city's consultants summarized their rate study findings and recommendations. This was followed by a February 2016 city council meeting at which council approved a contract for design of this proposed project. The third opportunity occurred in March 2016 when council voted to increase sanitary sewer rates. Then, in June 2016, the city's director of public service posted a fact sheet at city hall for no less than 15 days. According to the city and its consulting firms, no written or verbal comments were received in 2016 in response to this unannounced posting. Finally, the city plans to designate a web site for notifying the public about this project on a going forward basis, including postings of city reports and a revised project fact sheet. 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. All potentially-interested parties appear to have been given adequate opportunity to review and comment on this project and its costs.

Additional information that supports this decision to issue an LER is available for public inspection upon request at the City of Girard main office located at 100 West Main Street, Girard, Ohio 44420. Mr. Jerry Lambert, Service Director, is the city's contact, and can be reached either by phone at (330) 545-3306, or by email at jlambert@cityofgirard.com to answer questions related to this important project for the city.

H. Interagency Coordination

The proposed project has been reviewed by the following agencies for technical input, or for conformance with legislation under their jurisdiction by Ohio EPA; these findings support a LER:

Ohio Department of Natural Resources	Ohio EPA
Ohio Historic Preservation Office	United States Fish and Wildlife Service

I. Conclusion

The proposed project is sufficiently limited in scope and meet all applicable criteria to warrant a LER. The planning activities for the proposed project identified no potentially-significant, direct, indirect, or cumulative adverse impacts. The proposed project is expected to have no short- or long-term adverse impacts on the quality of the human environment or on sensitive resources such as air quality, floodplains, wetlands, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, or threatened or endangered species. The City of Girard's proposed POTWs improvements project will enable the city to address its regulatory responsibilities under the Clean Water Act -- especially those related to CSOs and excessive I/I conditions that prompted the city to initiate this proposed project. Public health risks associated with potential exposure to untreated sewage in the project areas will also be reduced through elimination of the internal, secondary WWTF bypass. Only when influent flows exceed 12 mgd will the city's remaining regulated CSO (#003) activate and discharge to Little Squaw Creek (see Figure 4). Normal operation and full treatment will resume once flows drop below 12 mgd (the maximum flow capacity of the secondary and ultraviolet treatment units at the city's WWTF). The WWTF's maximum pumping capacity of 22 mgd is based on a 24-hour, 50-year design storm of 4.77 inches.

J. For further information, please contact:

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