



**March 18, 2024**

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

**Board of County Commissioners of Hamilton County, Ohio – Hamilton County  
MCWWTP Standby Power Distribution System Improvements  
Mill Creek WWTP Loop Improvements  
Loan numbers: CS391525-0165, CS391525-0176**

The attached Limited Environmental Review (LER) is for two wastewater treatment plant electrical upgrades projects in Cincinnati 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 projects, their 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 projects should not result in significant adverse environmental impacts. This projects' relatively narrow scope and lack of environmental impacts qualifies them 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 projects have changed significantly.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief  
Division of Environmental and Financial Assistance

Attachment

## LIMITED ENVIRONMENTAL REVIEW

### **Project Identification**

Projects: MCWWTP Standby Power Distribution System Improvements  
Mill Creek WWTP Loop Improvements

Applicant: Board of County Commissioners of Hamilton County, Ohio  
138 East Court Street  
Cincinnati, Ohio 45202

Loan Numbers: CS391525-0165  
CS391525-0176



**Figure 1. Hamilton County**

### **Project Summary**

The Board of County Commissioners of Hamilton County, Ohio (Board) has requested funding from the Ohio Water Pollution Control Loan Fund (WPCLF) to finance the MCWWTP Standby Power Distribution System Improvements and the Mill Creek WWTP Loop Improvements projects. Work for these projects will include improvements to the electrical system and the addition of two new standby power generators at the Mill Creek wastewater treatment plant.

### **History & Existing Conditions**

The Board, based in Hamilton County (Figure 1), manages the Metropolitan Sewer District of Greater Cincinnati (MSDGC), also known as the Metropolitan Sewer District (MSD). MSD operates a number of different wastewater treatment plants (WWTPs) within the City of Cincinnati, including the Mill Creek WWTP. This WWTP began operations in 1959. It is MSD's largest WWTP, covering about 75 acres, and handles an average daily flow of about 130 million gallons of wastewater per day, with peak flow of 240 million gallons.

In 2013 and 2014, MSD conducted the Electrical Power Renovation Asset Management Program in order to assess the state of the electrical system at the Mill Creek WWTP and determine what upgrades needed to be made. The assessment identified the two projects below as critical to improve safety and reliability, as the various electrical components were found to be obsolete and in need of repairs.

### **Project Description**

The projects consist of various electrical upgrades to the Mill Creek WWTP. The Standby Power Distribution Improvements project includes demolishing the existing generator in the Mill Creek WWTP and replacing it with two new generators that will act as sources of backup power in the event of a power outage.

The Loop Improvements project includes replacements of electrical components in various transformers, as well as cable replacements between electrical substations. Several switchboards

and breakers will be replaced in the sludge thickener building and north pump building. See Figure 2 below for a map of the project area.

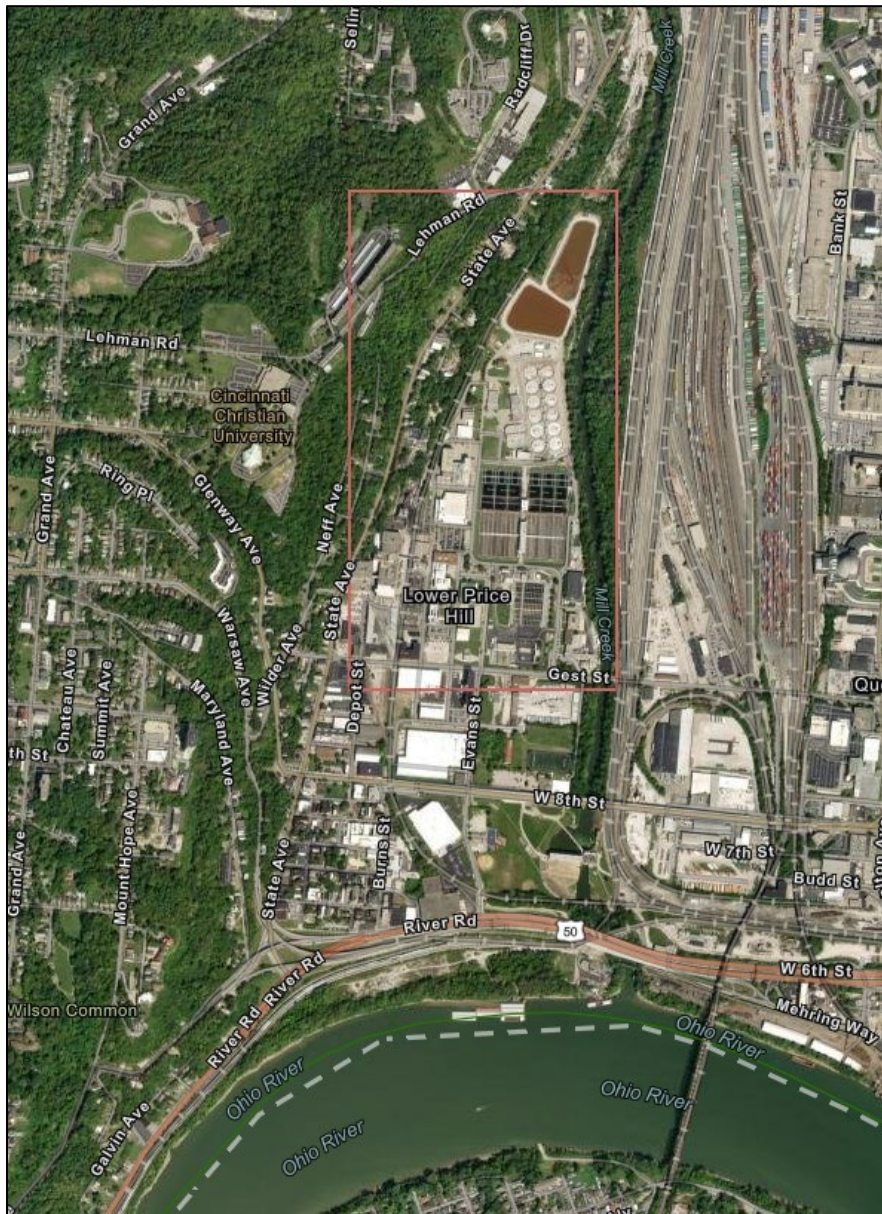


Figure 2. Mill Creek WWTP

### **Implementation**

The Board proposes to borrow approximately \$20 million from the Ohio WPCLF for the two projects at an interest rate of 2.42%; WPCLF interest rates are set monthly and may change for a later loan award. Assuming a 20-year loan, borrowing this amount in WPCLF dollars could save the Board approximately \$3 million over the life of the loans compared to the current market rate of 3.67%. The average annual bill for residents served by the Board is \$638. This is 1.4% of the median household income (MHI: \$45,235) and is higher than the Ohio average sewer bill, \$490. Construction began in November 2023 and will be completed in approximately 27 months.

## **Public Participation**

These projects were discussed in two public budget hearings per year in 2018, 2019, and 2021. Additional public meetings were held on December 15<sup>th</sup>, 2022, and August 24<sup>th</sup>, 2023, that authorized construction funding for the projects. The projects are entirely within an existing treatment plant, so construction impacts to the community are expected to be minimal.

Ohio EPA is unaware of opposition to or controversy about the projects. Ohio EPA will make a copy of this document available to the public on its webpage: <https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements> and will provide it on request to interested parties.

## **Conclusion**

The proposed projects meet the criteria for a Limited Environmental Review (LER); namely, they are an action within an existing public wastewater treatment facility, which involves the functional replacement of and improvements to existing electrical equipment. Furthermore, the projects meet the other qualifying criteria for an LER; specifically, the proposed projects:

**Will have no significant environmental effect, will require no specific impact mitigation, and will have no effect on high-value environmental resources** because the construction will be taking place inside of an existing WWTP that has experienced previous excavation. There are no high-value environmental resources in this developed area.

**Is cost effective and is not a controversial action** because there is no viable alternative to replacing failing electrical equipment within a WWTP. Ohio EPA is unaware of controversy about or opposition to this project.

**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 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** because this project merely upgrades existing equipment in the WWTP and has no other effect on the city sewer system. Service will not be extended in any way nor provide additional capacity.

Based upon Ohio EPA's review of the planning information and the materials presented in this Limited Environmental Review, we have concluded that there will be no significant adverse impacts from the proposed projects as it relates to the environmental features discussed previously. This is because these features do not exist in the project area, the features exist but will not be adversely affected, or the impacts will be temporary and mitigated. These projects will ensure that the Mill Creek WWTP continues to operate efficiently and provide service to Cincinnati.

## **Contact Information**

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