



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

August 27, 2021

**Preliminary Finding of No Significant Impact
To All Interested Citizens, Organizations, and Government Agencies**

**City of Union – Montgomery County
Martindale Rd. and Frederick Pike Watermain Extension Project
Loan Number: FS390926-0002**

The attached Environmental Assessment (EA) is for a drinking water infrastructure improvement project which the Ohio Environmental Protection Agency intends to finance through its Water Supply Revolving Loan Account (WSRLA) below-market interest rate revolving loan program. The EA describes the project, its costs, and expected environmental benefits. We would appreciate receiving any comments you may have on the project. Making available this EA and seeking your comments 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 WSRLA program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. More information can be obtained by contacting the person named at the end of the attached EA.

Any comments on our preliminary determination should be sent to the email address of the contact named at the end of the EA. We will not act on this project for 30 calendar days from the date of this notice. In the absence of substantive comments during this period, our preliminary decision will become final. After that, the City of Union can then proceed with its application for the WSRLA loan.

Sincerely,

Jonathan Bernstein

Jonathan Bernstein, Assistant Chief
Division of Environmental & Financial Assistance

Attachment

ENVIRONMENTAL ASSESSMENT

Project Identification

Project: Martindale Road and Frederick Pike Watermain Extension Project

Applicant: City of Union
118 North Main Street
Union, OH 45322

Loan Number: FS390926-0002

Project Summary

The City of Union, in Montgomery County, has requested financial assistance from the Ohio Water Supply Revolving Loan Account (WSRLA) to eliminate a public health risk due to contaminated wells serving a public water system.

History & Existing Conditions

Union receives its drinking water from the Great Miami Buried Valley Aquifer using four groundwater production wells. Water treatment includes aeration to oxidize and precipitate iron, filtration, chlorine disinfection, and fluoridation for dental benefits. Treated water is pumped to two water towers with total storage capacity of 1 million gallons and distributed throughout Union to 2,827 service connections via approximately 37.5 miles of pipe.

Union also supplies water to the developing Ascent Industrial Park next to the Dayton International Airport and anticipates increased water demand from those facilities. To meet the expected need, the city is extending a larger water main along Martindale Road from an existing water main west of the Stillwater River to the intersection with Frederick Pike (Figure 1).

Coincidental with planning for the water main extension, Ohio EPA testing confirmed levels of per- and polyfluoroalkyl substances (“PFAS”) above the action level of 70 parts per trillion in the privately-owned public water system at the nearby Aullwood Audubon Center Farm that is a regional public visitor and education facility. Testing of Aullwood’s water system was part of Ohio’s PFAS Action Plan for Drinking Water.

The human health threats of PFAS “forever chemicals” in drinking water and their presence in the environment have been only recently understood. PFAS are a family of over 4,000 synthetic compounds used in industrial, commercial, and consumer products and are common in non-stick coatings and fire suppression foams. Ohio in 2019 created its PFAS Action Plan for Drinking Water to better understand the statewide distribution of the chemicals and minimize existing risks.

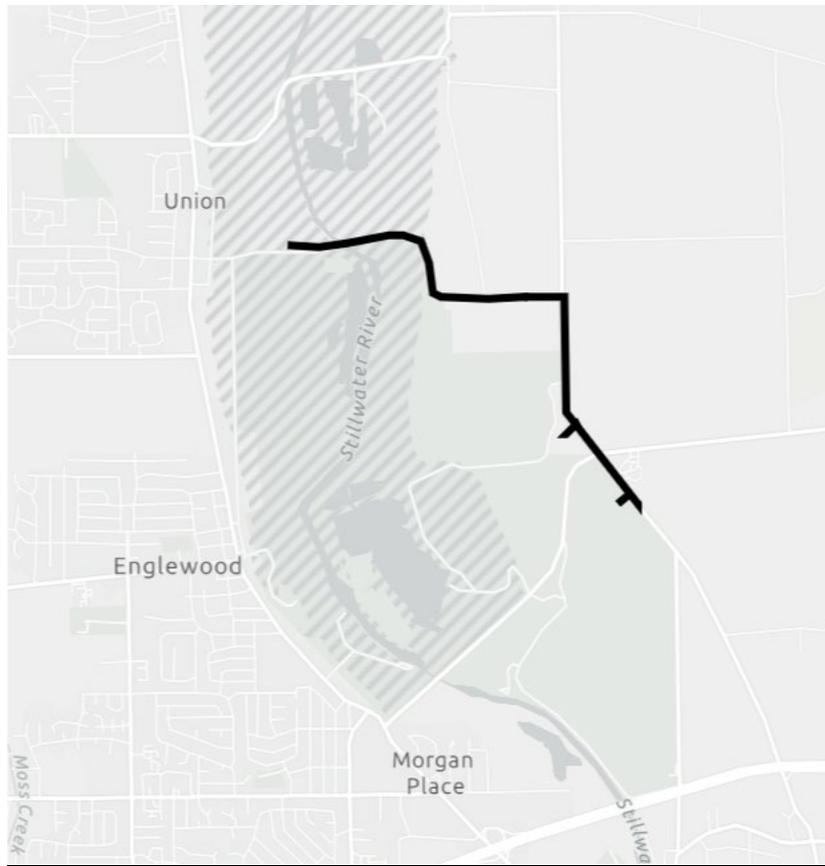


Figure 1 - Project Alignment

Population and Demand Projections

The population of Union, approximately 6,870, has increased 0.7% in the past decade. Growth is likely to be similarly modest. Average daily water demand is approximately 500,000 gallons. The city has capacity for additional service in the industrial park and for the modest number of potential new residential customers along the new pipe alignments.

Alternatives

Union recognizes a future increased water demand by the industrial park. The Martindale Road route is the most direct for providing that service. Doing nothing to prepare for that demand, the “no action” alternative, would potentially impact anticipated development plans at the industrial park. Extending water service in anticipation of the planned need on the most direct route is the feasible alternative. Because the PFAS contamination was discovered as Union was planning its water main extension to Frederick Pike, extending service further to the Audubon property became potentially feasible. The “no action” alternative for this consideration would leave the Audubon public water system contaminated and require ongoing, costly water hauling the only option for provide drinking water to employees and the public. The only feasible alternative, which will provide a cost-effective, long-term solution, is extending a water main south to the Audubon property as an addition to the Martindale Road water main project.

Selected Alternative

This project will install approximately 7,700 linear feet of 12" diameter water main from an existing main west of the Stillwater River along East Martindale Road to Frederick Pike and approximately 5,300 linear feet of 12" water main from the intersection of East Martindale Road and Frederick Pike south to the Aullwood Audubon Center Farm on Frederick Pike. The project includes constructing 940 linear feet of 8" water main onto the Audubon property and nearby Englewood Metropark property, with service agreements by both owners.

Property owners along the alignments who choose to may connect to the new water mains.

Implementation

Union qualifies for approximately \$1.7 million from the WSRLA as a principal forgiveness loan (the loan does not need to be repaid) in the "Source Water Remediation Project" category for the Frederick Pike water main due to the confirmed existence of PFAS contamination in a public water system. City funding will pay for the East Martindale portion of the project. Union will save approximately \$3,850,000 by using WSRLA principal forgiveness, compared to a 20-year, market rate loan at 1.71%.

The annual residential water bill in Union is approximately \$250. This project requires no rate increase.

Construction is ongoing and is expected to be completed before January 2022.

Public Participation

Union's project partner, the Montgomery County Transportation Improvement District (TID), has project information, including details on traffic detours, on its web page. A letter to property owners along the project route describes the opportunity for connecting to the new water main.

Ohio EPA is unaware of opposition to or controversy about the project.

Ohio EPA will make a copy of this document available to the public on its web page (<https://epa.ohio.gov/defa/ofa#169638770-wsrla-documents-for-review-and-comment>) and will provide it on request to interested parties.

Environmental Impacts

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

Because the construction disturbance area is predominantly in the road, no trees will be removed, and horizontal directional drilling (HDD) will install the water main beneath the Stillwater State Scenic River with no in-stream disturbance, federally-listed *threatened or endangered species* (Indiana bat, rayed bean mussel, snuffbox mussel, threatened northern long-eared bat, eastern massasauga rattlesnake) or important *terrestrial or aquatic habitat* will not be impacted.

Similarly, the project meets State **Scenic River** environmental protection requirements, affects no **wetlands** or **farmland**, and will not change **land use** or generally affect **fish and wildlife**.

The project involves no above-ground structures that could alter flood flows or flood elevations. The starting point of the project west of the Stillwater River is in the regulatory 100-year **floodplain** upstream of the Miami Conservancy District Englewood (dry) Dam that stores water only after heavy or prolonged rains.

Shallow trenching typical of water main construction will not reach depths that could affect **ground water resources** or residential wells and similarly is unlikely to adversely affect ground water quality or private or public **safe drinking water** supplies. Union's water supply is ground water; the project does not affect the Stillwater River or other **surface water resources**.

There is no evidence of important **cultural resources** (archaeological or historical features) in the project disturbance area.

Neither local **air quality** nor regional **energy** supplies will be affected by this project that adds no sources of air pollution or pumps or other energy consuming equipment. Fugitive dust, a temporary effect of construction, will be controlled with water spray or other benign dust suppressant.

Construction will be limited to daytime hours and involve audible sounds of typical motorized construction equipment similar to that of traffic regularly transiting the same roads. Traffic detours with appropriate signage are included in the construction plan that also requires covering or filling all trenches at the end of each workday. After final surface restoration is complete, the project area aesthetics will be insignificantly different from pre-construction conditions. For these reasons, the project will not adversely affect **noise, traffic, safety, or aesthetics**.

The project requires no water rate increase and will have no negative impact on the **local economy**. The typical annual residential water bill in Union is \$250, which is approximately 0.4% of local median household income (MHI; \$71,180). This compares favorably to the Ohio average residential water bill (\$639) which is 1.2% of state MHI.

Conclusion

Based on its review of this project's general plans and other information, Ohio EPA concludes that no significant short-term or long-term adverse direct environmental impacts will result from the project as related 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 mitigated.

This project equally serves the project area and no particular segment of the community will be faced with additional adverse impacts or be deprived of environmental benefits, compared to any other segment.

For these reasons, 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.

Ohio EPA expects the economic impact of the project on the average user to be insignificant because it requires no rate increase and Union developed a favorable financing package that kept project costs low.

The project will eliminate a potential public health threat from PFAS-contaminated ground water.

Contact Information

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