



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

**October 19, 2018**

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

**CHOCTAW UTILITIES, INC.  
WATER PLANT REPLACEMENT  
FS391083-0002**

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?**

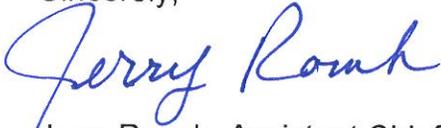
Any comments supporting or disagreeing with this preliminary decision should be submitted to me at the letterhead address. We will take no action on this general plan for 30 calendar days from the date of this notice in order to receive and consider any comments.

**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  
Choctaw Utilities, Inc.**

**Water Plant Replacement  
Loan Number FS391083-0002**

**Applicant: David Lohrer, President, Board of Directors  
Choctaw Utilities, Inc.  
2005 Itawamba Trail  
London, Ohio 43140**

## **Project Summary/Background**

Choctaw Utilities, Inc. (Choctaw Utilities) owns, operates and maintains a potable water system that serves residents and businesses situated around Choctaw Lake, a 285-acre private lake community located in Madison County. Despite regular maintenance, the over 50-year old, 400,000-gallon per day (GPD) ground water-sourced system has experienced ongoing compliance issues and was evaluated as being in “poor” condition in a recent engineering evaluation. In an effort to provide safe, potable and cost-effective drinking water to Choctaw Lake service area, and to better supply the water needs of planned development within the service area, the proposed Water Plant Replacement project includes the installation of a new aerator, aeration contact tank, high service pumps, pressure filters and new water treatment plant building. The proposed project (see Figures 1 and 2) would allow Choctaw Utilities to provide better water quality, ensure system pressures and fire protection to its customers, and allow for planned growth. The project, to be financed through an Ohio Water Supply Revolving Loan Account (WSRLA) loan, has an estimated construction cost of \$1,870,000. The approximate construction schedule is December 2018 through November 2019.

### **Existing Conditions**

The existing service area consists of 893 taps and has a residential population of 1,587. The Choctaw Lake service area also includes 30 residential lots which have yet to be developed. The Choctaw Utilities water treatment plant has wells drilled to an average depth of 250 feet, a 45-year old aeration tower, a 52,000-gallon contact detention tank and four pressure filters. The plant has an average daily production of 0.215 million gallons per day (MGD), a maximum daily production of 0.472 MGD, and an approved capacity of 0.4 MGD. The system has experienced issues with water discoloration and has ongoing compliance issues related to copper corrosion and maintaining required orthophosphate levels. Many of the components of the treatment plant are aged, including the contact detention tank, which is in violation and must be replaced by 2019, the aerator, which show signs of structural failure, and the pressure filters which have lasted beyond their useful life. These factors necessitated an evaluation of alternatives to address the situation.

### **Alternatives Analysis**

To address drinking water needs, Choctaw Utilities considered the following alternatives:

**Alternative 1 - Run to Failure.** This is essentially a “no-action alternative,” which would maintain current practices and not adequately address the public health threat related to the deteriorated condition of the system. This alternative has the potential to compromise water quality, allow structural failures, and leave Choctaw Utilities with inadequate pressure for fire protection and safe water pressure.

**Alternative 2 - Repair Existing Process.** This alternative involves replacing the existing aerator, contact detention tank and filters with “in kind” equipment.

Alternative 3 - Replace Existing Process. This alternative is an integrated system where aeration, detention and filtration are accomplished in a single unit and includes state-of-the-art automated controls and monitoring.

Alternative 4 - Replace Existing Water Treatment Plant. This alternative involves replacement of the entire water treatment system and includes a utility scale reverse osmosis system.

### **Selected Alternative**

Based on the evaluation of each alternative's effectiveness in addressing water quality, production and storage issues for the Choctaw Lake service area, Choctaw Utilities selected Alternative 2. The project includes a construction of a 50,000-gallon aeration contact tank and aerator, new water treatment plant building, including a water treatment chemicals storage and feed system, three high service pumps, four pressure filters, and ancillary equipment. The area of excavation for the project is within the existing water treatment plant facility and adjacent to existing structures. Following construction, and separate from this project, Choctaw Utilities will eventually perform demolition of the structures being replaced. Also separate from, but related to this project, Choctaw Utilities is in the process of installing an additional ground water well within the water treatment plant. These projects will ensure water quality and pressures, and will also increase the water treatment plant capacity to 0.55 MGD.

### **Implementation**

The total estimated cost of the proposed project is \$1,870,000. Choctaw Utilities proposes to borrow funds to finance this project from the Ohio Water Supply Revolving Loan Account (WSRLA). The project service area qualifies for the small system long-term WSRLA below-market interest rate on 20-year loans, which in October is 1.68 percent. The standard rate is changed monthly to reflect bond rates and may be slightly different in December of 2018, the anticipated month of loan award. Borrowing at 1.68 percent will save Choctaw Utilities approximately \$390,000 over the life of the loan compared to the current market rate of 3.43 percent.

Debt for the project will be repaid from monthly water fees. The monthly fee was recently increased from \$30 to \$39 per month in anticipation of this project. Once projects for the water treatment plant have been completed Choctaw Utilities will revisit the water rates to ensure that they are sufficient to maintain the system. The local median household income (MHI) is \$57,406. Under the water rates that are effective in 2018, the average residential water bill is \$39 per month, or \$468 per year. This represents 0.82 percent of the MHI, which is considered affordable.

Construction of the proposed project is estimated to begin December of 2018 and is expected to be completed November of 2019. The facility will continue to be owned and maintained by Choctaw Utilities.

## 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 and Ground 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 be performed within the area of an active water treatment plant 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 or ground 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 Madison County. However, the project does not include any tree clearing and trimming. Therefore, no impacts to these species are anticipated.

Several threatened or endangered aquatic species are present within Madison 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 species of concern bald eagle can be found in Madison County. However, they are not believed to be present in the project area. This is due to the project area's habitat (a maintained, commercial lot within an active water treatment facility) 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: Madison 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 Madison 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 replacement components of the water treatment plant are expected to be similar to the existing system and contribute minimal additional pollution to 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 replacement components is expected to be similar to the existing system, and not expected to contribute any additional long-term dust, noise or odor to the project area.

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 an area 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: The proposed project will be implemented exclusively within an existing water treatment facility that has undergone extensive grading and excavation. Based on this information, Ohio EPA believe that the proposed project will have no effect on unrecorded archaeological sites, or properties eligible or listed on the National Register of Historic Places.

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 monthly service fees and were raised in 2018 in anticipation of this project. The residential water bill in the Choctaw Lake service area will be \$397 per month, or \$468 per year. This is 0.82 percent of the median household income of \$57,406, which is considered affordable.

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 community involvement through various informational and technical meetings. Public feedback has been generally positive thus far. A public notice announcing the future availability of this Environmental Assessment will be posted on the Choctaw Lake Property Owners Association 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 to support the needs of residential customers and businesses throughout the project area.

For further information, please contact:

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Ohio Environmental Protection Agency  
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Columbus, Ohio 43216-1049

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Figure 1: General project area (in red).



Figure 2: Project area (in red).