



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

May 31, 2011

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

Barberton Water Storage Tank Improvements
Summit County
WSRLA #: FS390134-0003

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 City of Barberton.

How were environmental issues considered?

The Drinking Water Assistance Fund 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 at the end 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. Barberton 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,



fm
Gregory H. Smith, Chief
Division of Environmental & Financial Assistance

GHS/DH

Attachment

c: Sue Farmer, OWDA
File (2)

ENVIRONMENTAL ASSESSMENT

A. Project Identification

Name: Barberton Water Storage Tank Improvements

Address: Jim Stender, Utility Director
City of Barberton
576 West Park Avenue
Barberton, OH 44203

WSRLA #: FS390134-0003

B. Proposed Project

1. Summary

The City of Barberton in Summit County has requested \$4,000,000 from the Ohio Water Supply Revolving Loan Account (WSRLA) to improve its water distribution system by repainting one elevated storage tank and replacing two aged and deteriorating elevated storage tanks.

Tank repainting (Eastern Road Tank) involves shrouded sandblasting and scraping, followed by painting, with no land disturbance. Tank replacement involves demolition of the existing tank and abandonment of related pipes and structures and construction of the new tank. The East Side Tank replacement will be constructed on a neighboring property that formerly housed a school, and include excavation in a road to install pipes. Upon completion of the new tank, the existing tank will be demolished. The existing Bauer's ("Bowers" in some documents) Hill Tank will be demolished and the new tank constructed on the same site, and requires limited tree removal which is scheduled to avoid potential impacts to the federal-list endangered Indiana bat.

No public opposition to or controversy about this project is evident, and the project requires no water rate increase. Barberton qualifies for a WSRLA financing with 20% principal forgiveness if loan award is made before July 2011.

2. Project Background

A preliminary engineering study, including hydraulic modeling of the distribution system, evaluated the existing and potential locations for the East Side and Bauer's Hill tanks. Modeling the feasibility of combining the storage capacity in one larger tank yielded unsatisfactory results, and Barberton re-confirmed the existing locations as the best locations.

A physical inspection of the Eastern Road Tank showed it is structurally sound and requires routine re-painting.

A physical inspection of riveted steel East Side Tank, 80 years in service, showed it is in poor condition at the end of its design life cycle. The tank is within 15 feet of two homes, which presents a potential threat to public safety.

A physical inspection of the riveted steel Bauer's Hill Tank, also 80 years in service, showed it is in fair condition at the end of its design life cycle.

c. Population and Water Demand Projections

The City of Barberton, and much of Summit County, experienced population loss during the 1970s and 1980s and has shown modest growth in the past two decades. The 2000 Census population reflected a 1.0% increase from 1990 to 2000. Barberton provides water and sewer service within its borders and to neighboring Norton, which saw modest growth from 1990 to 2000, and New Franklin, which saw population loss in that decade. Barberton has excess water supply and sewage treatment capacity due to loss of major industrial users, and can provide these services to its customers without treatment expansion for the indefinite future.

3. Feasible and Selected Alternatives

Barberton considered several approaches to ensuring the reliability of its water storage infrastructure, including blasting and re-painting tanks, demolishing and replacing tanks on the same sites, and demolishing and replacing tanks on new sites. Doing nothing, the "no-action" alternative, is unacceptable to Barberton because the age and condition of the tanks suggest a potential for catastrophic failure if identified problems are unaddressed.

Repainting would address corrosion and coating issues, and is the selected action for the Eastern Road Tank. Addressing the corrosion / coatings problems on the other two tanks would do nothing to correct the identified age and structural issues, and would only temporarily delay replacement without eliminating the potential threat to public safety of the East Side Tank due to proximity to residences.

Replacing the Bauer's Hill Tank on the existing site would address the identified age and structural issues, and is the selected action for that tank.

Replacing the East Side Tank on the existing site would address the identified age and structural issues and maintain the potential threat to public safety of the East Side Tank due to proximity to residences. Replacing the tank on a new, nearby site would address all identified issues and is the selected action for that tank.

Barberton has determined to sandblast and paint the Eastern Road Tank, replace the East Side Tank on a neighboring property (and demolish the existing tank), and demolish the Bauer's Hill Tank and replace it on-site (Figure 1).

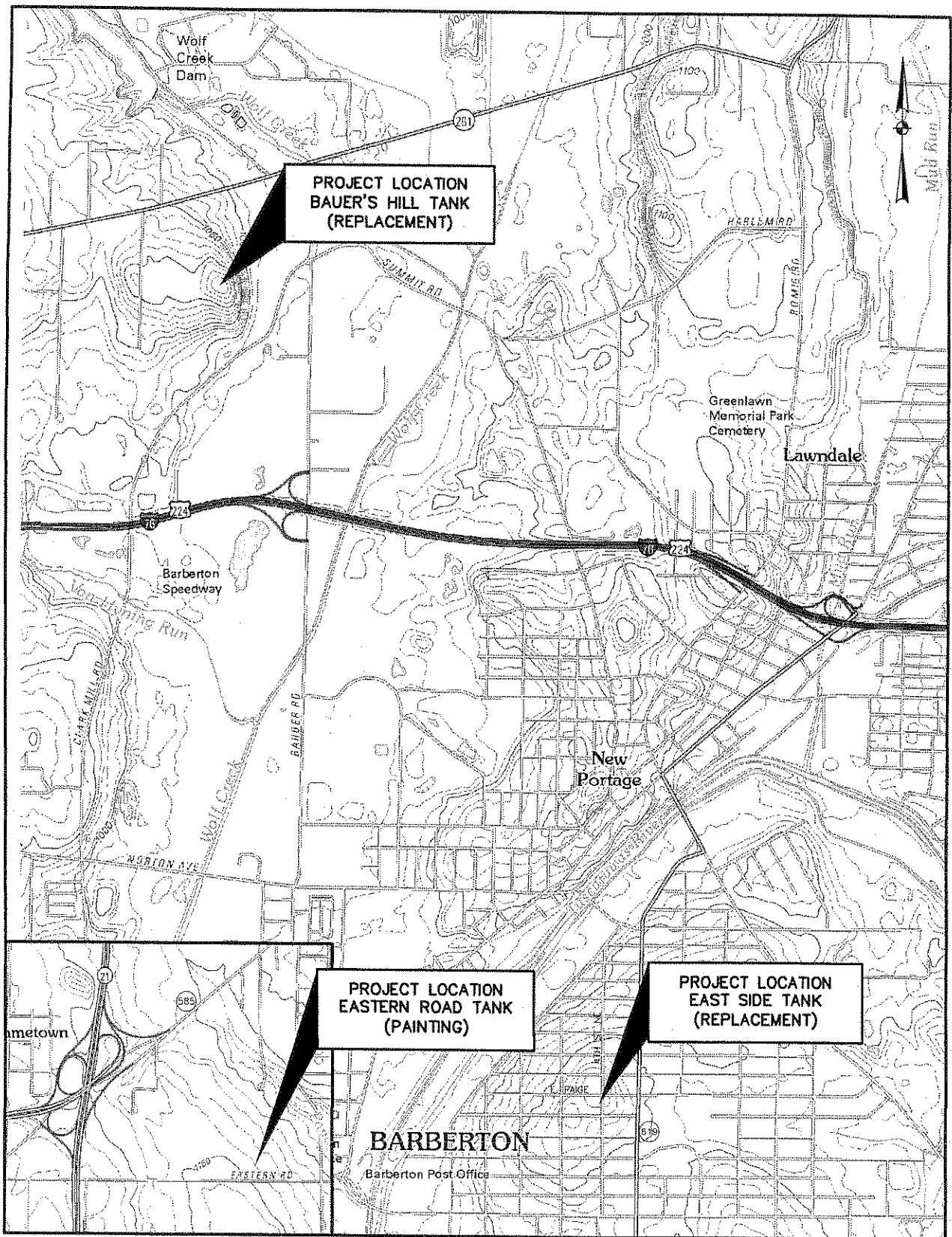


Figure 1 – Project Locations

The Eastern Road Tank re-painting includes draining the tank; cleaning, painting, and disinfecting the interior of the tank; and abrasive blasting and painting of the exterior, including containment and proper disposal of waste generated by blasting and painting.

The East Side Tank replacement involves construction of a 750,000 gallon single-pedestal spheroid steel tank at the former site of an elementary school adjacent to the site of the existing tank, land that is now mown grass with a few landscape trees. Construction includes installation of 350 linear feet of 16" diameter E. 4th Street connecting the tank to the distribution system, and 86 linear feet of 8" pipe connected to the sanitary sewer for emergency or maintenance draining of the tank. Barberton has determined that the adjacent sanitary sewer has sufficient capacity to accept the tank drain volume; connecting the drain to a more-distant storm sewer with sufficient capacity would have increased the project cost for construction of a longer pipe. The existing tank will be demolished and the site restored to lawn after the new tank is operational.

The Bauer's Hill Tank replacement involves demolition of the existing 924,000 gallon steel standpipe tank and construction of a 1,200,000 gallon pre-stressed concrete tank on the same site. The project also includes upgrades to the existing electrical service and dirt access drive.

These improvements are part of Barberton's current Ten Year Capital Improvement Plan:

2011 East Side & Bauer's Hill Tanks, Miscellaneous Water Line Replacement, Dam Stability Study

2012 Dam Valve Replacement & Intake Extension, Water Plant Improvements Engineering Study, Miscellaneous Water Line Replacement

2013 Water Plant Sedimentation Basin Roof Repairs

2014 – 2020 Miscellaneous Water Line Replacement

4. Project Implementation

The project schedule anticipates advertising for bids in May, 2011 in anticipation of a June loan award.

Barberton will borrow approximately \$4,000,000 from the WSRLA with 20% of loan amount awarded as principal forgiveness in the "Non-Disadvantaged Community with Economic Affordability Ranking" category, with the balance (80%) at 2.0% interest for 20 years. During the 20-year loan period, Barberton will save approximately \$2,712,000 by using WSRLA dollars at this rate, compared to the market rate of 4.99%.

This project requires no rate increase for Barberton customers.

C. Environmental Impacts of the Proposed Project

Tank painting requires no land disturbance and, assuming proper shrouding, painting, and materials collection and disposal, presents little opportunity for adverse environmental impact. Because the contract requires proper preparation, painting, and materials disposal, the Eastern Road Tank project will have no significant adverse impact on the human environment.

The East Side and Bauer's Hill tank sites are at elevation and lack floodplains, wetlands, and surface water resources, and will have no effect on these categories of resources or on aquatic habitats associated with these resources.

Major land forms will be unaffected by the tank replacements because the Bauer's Hill Tank will be replaced on the same location as the existing tank and the East Side Tank will be replaced on relatively flat land that requires no significant leveling or excavation.

Ground water resources will be unaffected by the tank replacements because the Bauer's Hill site is at elevation and requires no additional, significant excavation for foundation preparation that would interfere with ground water. The East Side site, also at elevation, will require foundation excavation that could intercept shallow ground water. However, the surrounding area is served by the Barberton municipal water supply and no water wells that could be affected are in the area.

Significant terrestrial habitats will be little affected by construction of the replacement East Side Tank or demolition of the existing tank because the sites lack significant habitat. The few mature landscape trees on the site of the new tank lack features attractive to endangered Indiana bats. The Bauer's Hill site and surroundings are forested with trees and tree features typically associated with Indiana bat foraging and maternity roosts. To avoid potential threats to Indiana bats from clearing adjacent to the existing tank site, the contract requires no vegetation disturbance between April 1 and September 30, the period when Indiana bats may be expected in the area.

Agriculture will be unaffected by these projects. Neither the Eastern Road Tank site nor the East Side Tank site involves agricultural land. The Bauer's Hill Tank site is forested. Access to the tank is an existing drive across crop land, which will remain and have no additional effect on agricultural use. No change to land use will result from the Eastern Road Tank repainting or the Bauer's Hill Tank replacement. The East Side Tank replacement involves constructing the new tank on mowed open space that had been a public school ground. Because the new tank will use approximately 10% of the property and leave unchanged the remainder, the loss of open space is insignificant.

Because the projects add no air pollution sources, and because the contract stipulates proper preparation, application, and materials disposal for painting, no impact to local or regional air quality is expected.

Traffic will be unaffected for the Eastern Road Tank painting (requiring no activity on the public right-of-way) and the Bauer's Hill Tank demolition and replacement (requiring no activity on the public right-of-way). Temporary traffic disruption will occur on East Paige and East 4th streets for pipe installation during construction of the East Side Tank replacement. Traffic will be maintained using standard construction traffic controls (flaggers, barricades, signs).

Construction sounds, similar to that of motorized traffic regularly transiting the area's roads, will be audible in the immediate vicinity of the East Side Tank construction and demolition. Otherwise, local noise levels will be unaffected by that project. The Eastern Road Tank and Bauer's Hill Tank sites are distant from residences and project sounds from those sites will have no effect on local noise levels.

Public safety at each site will be assured by maintaining existing security fencing and temporary construction fencing; by closing or covering all trenches at the end of each work day; and by strictly adhering to contract requirements for preparation, painting, and cleanup containment.

Local aesthetics will be unchanged by these projects. The repainted Eastern Road Tank will appear unchanged to the casual observer, as will the new Bauer's Hill Tank, which will be of similar size and shape to the present tank. The neighborhood around the East Side Tank will be insignificantly changed with construction of a new single-pedestal tank replacing the existing standpipe tank.

Local and regional energy use and supplies will be unaffected by these projects that add no energy consuming equipment.

Ohio EPA has determined that the projects will not cause a significant adverse effect to properties listed or eligible for listing in the National Register of Historic Places (archaeological and historical resources). City of Norton and City of Barberton officials confirmed the specific location of the "Black Plague Cemetery" in the vicinity of the Bauer's Hill Tank site outside of the project disturbance area. In the event of archaeological finds during construction, Ohio Revised Code Section 149.53 requires contractors and subcontractors to notify the Ohio Historic Preservation Office of any archaeological discoveries in the project area, and to cooperate with the Office in archaeological and historic surveys and salvage efforts. Work will not resume until a survey of the find and a determination of its value and effect has been made, and Ohio EPA authorizes work to continue.

By using the WSRLA low-interest financing, Barberton has minimized the impact on the local economy. These projects require no rate increase or direct costs to Barberton water customers. The typical residential annual water bill, \$448, is approximately 1.4% of local median household income (MHI). Annual water rates below 1.8% of MHI are generally considered affordable. Barberton's typical residential water bill compares favorably to the Ohio average, \$484.

D. Public Participation

Barberton published project information in the spring-summer 2011 issue of its "On Track" newsletter mailed to all city residents. Ohio EPA is unaware of opposition to or controversy about this project.

The following agencies reviewed this project's planning information:

Ohio Environmental Protection Agency
Ohio Historic Preservation Office
Ohio Department of Natural Resources
U.S. Fish and Wildlife Service

E. Reasons for a Preliminary Finding of No Significant Impact

Based on its review of general plans and other information collected about this project, 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 either 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 entire Barberton community, so 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 no rate increase is needed.

The project is expected to ensure continued reliable potable water distribution in the Barberton system.

For further information, please contact:

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