

## June 6, 2022

# Limited Environmental Review and Finding of No Significant Impact

Village of Edgerton – Williams County Elevated Storage Tank Rehabilitation Loan number: FS390329-0004

The attached Limited Environmental Review (LER) is for an elevated storage tanks improvement project in Edgerton 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 LER describes the project, its 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 WSRLA program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. This project's relatively narrow scope and lack of environmental impacts qualifies it 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 project have changed significantly.

Sincerely,

Kathleen Courtright, Assistant Chief

Kathleen Courtright

Division of Environmental and Financial Assistance

Attachment

## LIMITED ENVIRONMENTAL REVIEW

## **Project Identification**

Project: Elevated Storage Tank Rehabilitation

Applicant: Village of Edgerton

P.O. Box 609

Edgerton, OH 43517

Loan Number: FS390329-0004

# **Project Summary**

The Village of Edgerton in Williams County has requested \$434,033 from the Water Supply Revolving Loan Account (WSRLA) for safety improvements and interior and exterior coating replacements for Edgerton's two 100,000-gallon elevated water storage tanks. Work will take place within the confines of the existing storage tanks, therefore limiting potential impacts to environmental features.

# **History & Existing Conditions**

Edgerton provides potable water to approximately 2,000 customers through 18 miles of water distribution lines. The village operates a water treatment plant, distribution system, and two 100,000-gallon elevated storage tanks. Inspections of both elevated tanks were completed in 2020. Recommendations included recoating the exterior and interior of both tanks and making safety and other improvements.

The 100,000-gallon riveted tank is a double ellipse-type storage tank located near the railroad tracks at the intersection of Indiana Street and Oak Street. It was constructed in 1937. The exterior coating is an acrylic system. Coat deterioration includes spot failures to the substrate, topcoat delamination, and micro-cracking.

The 100,000-gallon industrial tank is located on Component Street near the railroad tracks and was constructed in 1969. The exterior coating is an acrylic system in poor condition. Coating deterioration includes spot failures to the substrate with rust undercutting, topcoat delamination, rust bleedthrough, micro-cracking, and erosion.

Both elevated storage tanks have a wet interior grease coating system with heavy metal primers. The coatings are in poor condition overall. Below the high-water level coating deterioration includes spot failures to the substrate, topcoat delamination, rust bleedthrough, and blistering throughout. Above the high-water level coating is deteriorating at the roof panels and at the open lap seams.

There are also various items needed to bring the tanks into compliance with currentsafety and Ohio EPA requirements: painters railing, gasket on roof hatch, pressure vacuum vent, and overflow pipe duckbill.

# **Project Description**

The proposed elevated water storage tank rehabilitation will ensure the protection of the elevated tank structures into the future and maintain sufficient delivery of potable water for the existing customers as well as any future connections to the village's water distribution system.

## Both tanks will receive:

- Exterior repaint with containment
- Wet interior repaint
- Caulk roof lap seams
- Spall repair
- Roof handrail and painter's railing
- Overflow pipe replacement
- 30-inch wet interior roof hatch
- Pressure vacuum roof vent
- Fall prevention devices
- Roof platform
- Wet interior ladder

## The riveted tank will also receive:

- Riser rod attachments
- Drain valve removal

#### The industrial tank will also receive:

- Balcony swing gate
- Vandal guard
- Riser grate

The project footprint will remain within the confines of the existing water storage tanks, thereby minimizing effects on environmental resources.

Maps of the project location are provided in the exhibits below.

# **Implementation**

# Project Costs

Edgerton plans to borrow \$434,033 from the WSRLA. During the 20-year loan period Edgerton will save approximately \$90,778 by using WSRLA dollars at the small system rate of 1.73%, compared to the market rate of 3.48%.

Interest rates are set monthly and may change for the requested June loan award.

# Local Economy

The current Edgerton residential water bill is approximately \$323/year. Projected residential water bills with the implementation of this project are expected to increase to approximately \$342/year, or 0.7% of median household income (MHI) of Edgerton, which is \$50,625.

By using WSRLA financing for this project, Edgerton has minimized the economic impact on customers.

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Project Schedule

The anticipated loan award will occur in June 2022. Improvements are expected to begin following loan award and be completed by the end of 2022.

## **Public Participation**

This project has been discussed at Village Council Committee meetings and will continue to be discussed as the project proceeds. These council meetings are regularly reported in the local newspaper. A public meeting is planned prior to advertising for construction bids.

Ohio EPA will make a copy of this document available to the public on its web page: <a href="https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements">https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements</a> and will provide it upon request to interested parties. Information supporting this Limited Environmental Review (LER) is available from the project contact named below.

# **Conclusion**

The proposed project meets the project type criteria for a Limited Environmental Review (LER); namely, it is an action within an existing water distribution system, which involves the functional replacement of and improvements to existing mechanical equipment. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

# Will have no significant environmental effect, no effect on high value environmental resources, and does not require extensive specific impact mitigation.

Construction for the project is limited to the confines of the existing elevated water storage tanks. Contractors will apply controls to minimize the creation of dust during construction if necessary. No changes to environmental features will occur.

# It is cost effective and not controversial.

The proposed project is cost effective as it involves seeking improvements to existing equipment. The replacement of both tanks would cost approximately \$3,200,000 with engineering and project costs. The rehabilitation is a much cheaper alternative since the structural integrity of both tanks is intact. Ohio EPA is unaware of any specific opposition to or controversy about this project that will assure a safe and adequate water supply can be maintained by the village.

Does not create a new, or relocate an existing discharge to surface or ground waters, does 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, or substantially increase the volume of discharge or 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.

This project involves improvements to existing structures and does not otherwise alter Edgerton's public water system (withdrawal, treatment, distribution, or usage of potable water).

# **Contact information**

Kristin Parrish Ohio EPA-DEFA P.O. Box 1049 Columbus, OH 43216-1049 kristin.parrish@epa.ohio.gov

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Exhibit 1: Project location map

Exhibit 2: Project location map



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