



**August 14, 2023**

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

**Village of Cardington – Morrow County  
2022 Sanitary Lining Project  
Loan number: CS390225-0013**

The attached Limited Environmental Review (LER) is for a sanitary sewer lining project in Cardington 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 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 WPCLF 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,

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**

Project: 2022 Sanitary Lining Project

Applicant: Village of Cardington  
PO Box 10  
Cardington, Ohio 43315

Loan Number: CS390225-0013



**Figure 1. Morrow County**

### **Project Summary**

The Village of Cardington in Morrow County has requested \$428,555 from the Ohio Water Pollution Control Loan Fund (WPCLF) for the 2022 Sanitary Lining project.

Work for this project includes using cured-in-place pipe (CIPP) lining to repair the existing sanitary sewer collection system throughout the village. The pipes to be lined are of adequate size to serve existing and planned growth of the village, with the ultimate reduction of infiltration and inflow (I/I) achieved.

### **History & Existing Conditions**

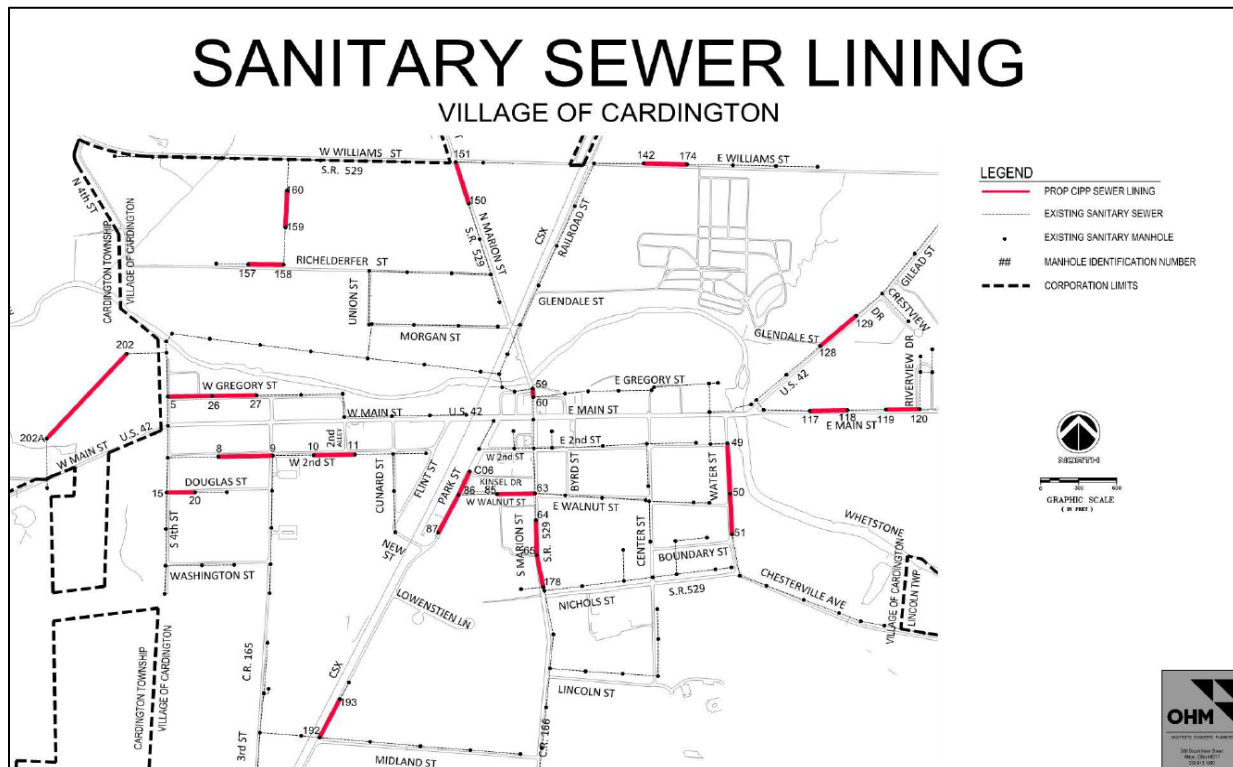
The Village of Cardington, in Morrow County (see Figure 1), maintains and operates its own wastewater collection system and wastewater treatment plant (WWTP) that serves 2,079 people. The WWTP discharges treated water to Whetstone Creek. The existing sanitary sewer collection system predominately consists of clay sewer with many of the pipes being damaged and/or in failing conditions including cracking, failed joints, and root intrusion. A sanitary sewer evaluation study (SSES) was performed in February 2018 followed by sewer televising of the entire sanitary sewer in August 2018. The SSES discovered that the sanitary sewer was collecting more infiltration (excess water from leaking pipes and connections) and inflow (excess water from improper connections to the sewer system) than what is normally observed in a typical separate sanitary sewer system. Since 2016, the WWTP has experienced one sanitary sewer overflow (SSO) and nine permit violations due to wet weather events.

### **Project Description**

Two alternatives were considered to mitigate failing sanitary sewer segments. The first alternative includes completing a full replacement of sanitary sewer segments. The second alternative entails completing structural CIPP lining of sanitary sewer segments found to be in failing condition. Full sewer replacement is significantly more expensive than CIPP lining and has a much larger impact to the environment and community, including additional duration of construction time and required staging space. CIPP lining is a trenchless technology that minimizes excavation and disruption of the ground surface, including a shorter duration of construction.

CIPP was the selected alternative for this project, including the lining of approximately 7,055 linear feet of clay sewer throughout the village. The locations of the sewer sections are located throughout the village and can be found in Figure 2. This project will be part of a multi-phased approach to reducing I/I throughout the village and eliminating future WWTP violations. The project consists of CIPP lining of approximately:

- 6,050 linear feet of 8-inch clay sewer
- 925 linear feet of 12-inch clay sewer
- 80 linear feet of 15-inch clay sewer



**Figure 2. Sanitary sewer lining project limits**

**Implementation**

The Village of Cardington plans to borrow \$428,555 from the Ohio WPCLF at the zero percent hardship rate to cover the cost of this project. During the ten-year loan period, Cardington could save approximately \$93,352 by using WPCLF dollars at this rate, compared to the current market rate of 3.91 percent.

The debt associated with this project will be recovered from user charges. Under the current ordinance, the fixed monthly rate per customer has remained the same since 2014 and is planned to stay the same until/unless further changed by village council. An estimated increase of 3 percent on the usage charges is being analyzed for the year of 2024. In 2022 the monthly residential sewer rate in Cardington was \$23.13 (\$277.56 annually). This is 0.7 percent of the median household income for Cardington (MHI; 40,588) and compares favorably to the Ohio average water bill of \$697.

Loan award is anticipated in September 2023, and construction is expected to be complete by the end of 2023.

## **Public Participation**

Village council meets twice per month in open session where the public is welcome to attend. The village's website allows for review of council meeting minutes, and ordinances and resolutions that have been passed to provide the public the ability to participate without attending the council meetings. The project is currently being displayed on the village main webpage with a link to the sewer lining map showing the affected areas.

Ohio EPA is unaware of any concerns or opposition to this project. Ohio EPA will make a copy of this document available to the public on the following webpage and can provide it upon request: <https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements>

## **Conclusion**

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

**Will have no significant environmental effect and will require no specific impact mitigation and will have no effect on high-value environmental resources** because the construction will be taking place primarily in the roadway, with no high-value environmental resources in the area. While one section will include lining an existing sewer outside of the roadway located west of West Gregory Street, no trees are anticipated to be removed, but small brush and other vegetation may be removed or impacted for equipment to get to the required manholes to perform the work. No high-value environment resources are within this area.

**Is cost effective** because the sewer televising helped prioritize the pipe segments in the worst condition to be the first phase of sanitary sewer improvements. It was determined that the sanitary sewer was in adequate condition to install CIPP lining to maximize the amount of rehabilitation efforts using the most efficient and economical method possible. Additionally, in comparison to the no-action alternative, the proposed project provides a structural renewal of the sewer with an expected service life of 50 years.

**Is not a controversial action** because it will make necessary improvements to Cardington's collection system to help reduce I/I. By obtaining WPCLF funding, Cardington has reduced the loan cost substantially to minimize sewer bill rate increases for its customers specifically for this project. Ohio EPA is unaware of any 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** because this project consists of only CIPP lining existing infrastructure and is primarily focused on addressing current public needs.

**Will not provide capacity to serve a population substantially greater than the existing population** because this project rehabilitates existing infrastructure to adequately service an existing population.

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 project 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.

The proposed project is a cost-effective way to address necessary improvements of existing infrastructure. Once implemented, the project will remedy extensive infiltration and inflow issues, protecting the health of residents within the area and eliminating future WWTP violations and SSOs.

**Contact Information**

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