



April 7, 2025

Limited Environmental Review and Finding of No Significant Impact

**Trenton - Butler County
Water System - 1.5 MG Elevated Storage
Loan number: FS390919-0002**

The attached Limited Environmental Review (LER) is for a new 1.5-million-gallon water storage tank in Trenton, which the Ohio Environmental Protection Agency (Ohio EPA) intends to finance through its Water Supply Revolving Loan Account (WSRLA) below-market interest rate revolving loan program. The LER describes the project, costs, and expected environmental benefits. Making available this LER fulfills the 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 program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. In accordance with Ohio Administrative Code 3745-150-05, this project meets the criteria for an LER rather than the more comprehensive Environmental Assessment. More information can be obtained by contacting the person named at the end of the attached LER.

Upon issuance of this Final 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, reading "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Water System - 1.5 MG Elevated Storage

Applicant: City of Trenton
11 East State Street
Trenton, Ohio 45067

Loan Number: FS390919-0002

Project Summary

The City of Trenton, located in Butler County (see Figure 1), has applied to the Ohio Water Supply Revolving Loan Account (WSRLA) for a new water storage tank. The total project cost is \$7,639,110 for a new 1.5-million-gallon tank. The project will result in sufficient water storage capacity and improved water pressure for customers.

History & Existing Conditions

Trenton owns a water treatment plant (WTP) rated to produce 3 million gallons per day (MGD), and sources their water from the Great Miami Buried Valley Aquifer. The average daily water production is 1.37 MGD, with an average daily consumption of 0.817 MGD. Trenton currently experiences a water system loss of approximately 33% according to metered water use estimates. This leaves the city with little extra water volume between its storage tanks and the water loss.

The city currently utilizes two water storage tanks, an elevated 1.0-million-gallon tank and a 0.5-million-gallon non-elevated clearwell storage tank. The two water storage tanks are located more centrally in town, leaving the south area of the city and the industrial park area with low water pressure (see Figure 2).

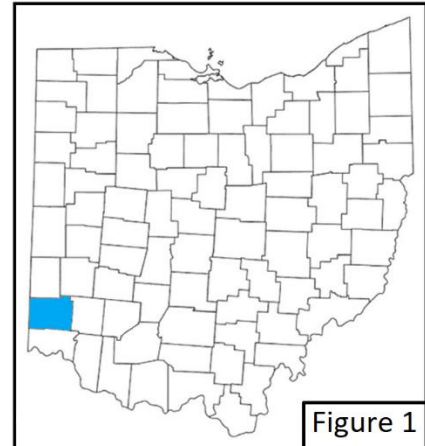


Figure 1

The city of Trenton is anticipating industrial growth that may require up to 700,000 MGD in additional water demand anticipated over the next 20 years, as well as residential growth in this timeframe. Trenton currently serves a population of 12,973. This forecast of increased water demand will direct water infrastructure improvements in the near future, including upgrades to the WTP and a new water storage tank.



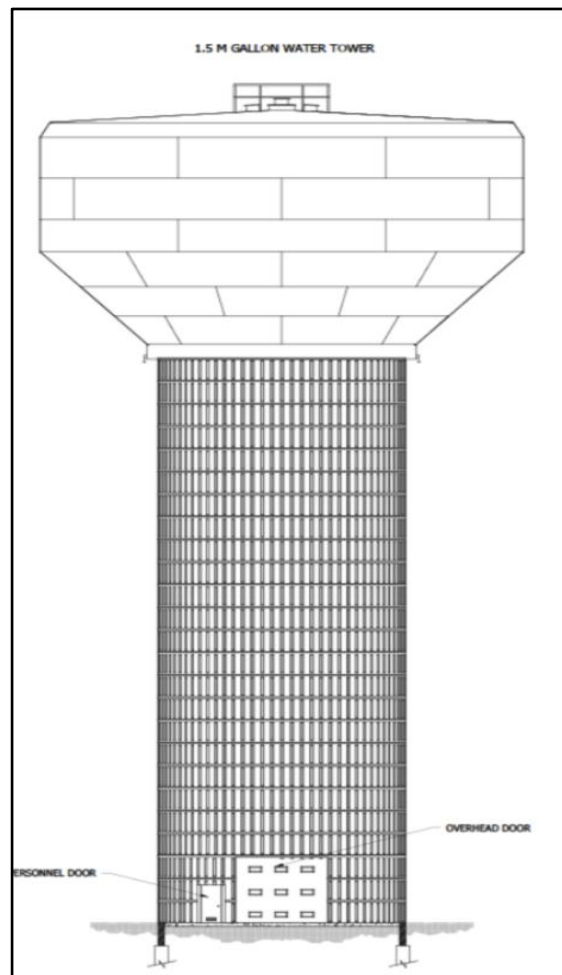
Figure 2. Map showing location of the two existing water storage tanks and the WTP.

Project Description

The project will construct a new 1.5-million-gallon water storage tank on Arnold Brown Industrial Drive (see Figure 3). The water storage tank will be a cylindrical elevated standpipe-style tank (see Figure 4) located south of town on a portion of farmland, adjacent to recent industrial developments. The site will include a short access driveway and provides space adjacent to the proposed storage tank for an additional future storage tank, should Trenton need it in the future.

The new storage tower will service existing water customers and allow for adequate water pressure within this area in south Trenton, as well as providing adequate water storage for daily water demand.

No trees will need to be cut down for the project, and no other valuable environmental resources will be disturbed to construct the storage tank.



Figures 3 and 4. Map of new water storage tank location marked with blue diamond. Drawing showing water storage tank style and shape.

Implementation

Trenton has requested \$7,639,110 from the WSRLA at the standard interest rate, currently 3.22%. During the 30-year loan period, Trenton will save \$2.06 million utilizing WSRLA funding, compared to the market rate, currently 4.52%. WSRLA interest rates are set monthly and may change for a later loan award.

A typical residential customer living in Trenton is currently paying \$42.67 monthly for water service. The most recent water rate increase was 3% in 2024. There are no other water rate increases planned. The estimated median household income (MHI) for a resident of Trenton is \$78,774. The average annual sewer costs are currently \$512, which is 0.6% of the MHI. By using below market-rate interest WSRLA funding, Trenton is minimizing the cost to its customers.

Anticipating loan award in April 2025, construction is estimated to begin shortly thereafter and be completed by summer 2027.

Public Participation

Trenton has made good efforts to notify residents and allow the public to comment about the project. The Trenton city council holds regular bi-monthly meetings on the first and third Thursday of each month, as well as special city council meetings as necessary. Council meeting announcements and agendas are posted on the city's website. The city has allocated time for open forum for comments or questions from the public. The city provides presentations related to changes to the public water system during the council meetings. Additionally, the annual consumer confidence report and project updates will be posted to the website.

Ohio EPA is unaware of any controversy about or opposition to this project. The Limited Environmental Review (LER) and Finding of No Significant Impact (FNSI) will be posted on the Ohio EPA Division of Environmental and Financial Assistance website. Additionally, the LER and FNSI have been provided to the City of Trenton to be made available according to their public notification procedures.

Conclusion

The proposed project meets the criteria for an LER; namely, it is an action within an existing public water distribution system, which involves the functional improvements to infrastructure. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect, will require no specific impact mitigation, and will have no effect on high-value environmental resources because the replacement will occur in a portion of an agricultural field. No trees will need to be cut down for the project, and no other valuable natural resources are present in the project area. The State Historic Preservation Office has agreed that the construction of the new water storage tank will not impact historic properties or viewshed.

Is cost effective and is not a controversial action as Trenton has chosen the best feasible alternative to correct the low water pressure issues by adding a new water storage tank in the south part of town most distant from the existing water storage tanks. Ohio EPA is unaware of any specific public opposition to the project.

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 because the project has no impact on discharges or withdrawals. No new service connections will be made, and no additional population will be served.

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.

This project will result in increased water storage, which will allow for better city planning for water needs. It will also result in improved water pressure for the south Trenton service area.

Contact Information

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