



May 13, 2026

**Preliminary Finding of No Significant Impact
To All Interested Citizens, Organizations, and Government Agencies**

**City of Tiffin – Seneca County
Interceptor Upgrade Project
Loan Number: CS390910-0020**

The attached Environmental Assessment (EA) is for an interceptor upgrade project in Tiffin 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 EA describes the project, its costs, and expected environmental benefits. We would appreciate receiving any comments you may have on the project. Making available this EA and seeking your comments 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 program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. More information can be obtained by contacting the person named at the end of the attached EA.

Any comments on our preliminary determination should be sent to the email address of the contact named at the end of the EA. We will not act on this project for 30 calendar days from the date of this notice. In the absence of substantive comments during this period, our preliminary decision will become final. After that, the City of Tiffin can then proceed with its application for the WPCLF loan.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental & Financial Assistance

Attachment

ENVIRONMENTAL ASSESSMENT

Project Identification

Project: Interceptor Upgrade Project

Applicant: City of Tiffin
51 East Market Street
Tiffin, Ohio 44883

Loan Number: CS390910-0020



Figure 1. Seneca County

Project Summary

The City of Tiffin, in Seneca County (Figure 1), has requested approximately \$32.2 million from the Ohio Water Pollution Loan Control Fund (WPCLF) to finance the Interceptor Upgrade project. This project involves the construction of the Benner Interceptor and upgrades to the Main Interceptor to increase conveyance capacities to reduce river water intrusion and combined sewer overflows (CSOs) to the Sandusky River.

This project is eligible for a portion of the loan as WPCLF principal forgiveness, which will not need to be repaid. Due to the nature and location of construction, as well as proposed protection measures to be implemented, no significant adverse impacts are anticipated, as discussed in the conclusion.

History & Existing Conditions

The City of Tiffin owns and operates a collection system and wastewater treatment plant (WWTP) that serves 17,953 people, including parts of Clinton and Hopewell townships. The WWTP discharges treated water to the Sandusky River.

The City of Tiffin submitted a long-term control plan (LTCP) in 2006 in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) permit to eliminate CSOs by performing 15 phases of sewer separation projects throughout the city over a 20-year period. After the first three phases of the plan were constructed, residents continued to experience basement backups, leading to the city reopening the CSO outfalls that were removed under those initial phases. The city decided to re-evaluate the LTCP program, as inflow and infiltration (I&I) and river water intrusion issues needed to be analyzed and addressed. The final recommended plan combines conveyance, storage, and treatment solutions to reduce overflows in the system to four events and zero bypassing events at the WWTP during a typical year. Ohio EPA approved the new plan in 2017.

Tiffin's LTCP is now comprised of three phases that extend until 2040. The first phase, which includes conveyance and storage, should be completed by July 2029. Phase 2 and 3 projects consist of I&I reduction projects. Phase 2 projects are scheduled to be completed in 2035, and Phase 3 projects are to be completed in 2040. This proposed project is part of Phase 1.

A majority of Tiffin's wet-weather flows from the south side of the city is conveyed underneath the Sandusky River by gravity through the city's existing Liberty Street dual siphon which is old and deteriorated, and experiences major infiltration. The Rock Creek siphon crosses Rock Creek to help carry flows to the Liberty Street siphon and experiences major infiltration and needs to be repaired.

Flows from the siphons are then conveyed through the Main Interceptor to the city's WWTP. The Main Interceptor is a 30-inch concrete pipe that gradually increases to 36 inches prior to entering the city's WWTP. During large rain events, when the collection system capacity is exceeded, excess wet-weather flows overflow the weirs at the existing CSO regulator structures located along the Main Interceptor and discharge into the Sandusky River.

To reduce the amount of CSO events to four events per typical year, conveyance upgrades and improvements within the system are necessary. A new interceptor is needed to increase the capture of wet-weather flows from the affected CSO basins and convey flows to the Main Interceptor. Additionally, Tiffin is completing a separate high-rate treatment (HRT) facility project to treat excessive wet-weather flows.

Population and Flow Projections

The current collection system serves almost 18,000 people. No large population growth is expected over the next 20 years. Tiffin WWTP's average design flow is 4.0 million gallons daily (MGD) with a peak hydraulic capacity of 6.0 MGD.

Alternatives

The proposed project includes an alternatives analysis of siphon improvements to fix deteriorating infrastructure and a new interceptor sewer (Benner Interceptor) to increase capture of wet-weather flows and eliminate CSOs.

Siphon Improvements

1. Washington Street Siphon

This alternative would continue to use the existing Liberty Street and Rock Creek siphons to handle the average daily flow while adding a single barrel Washington Street siphon to supplement wet-weather capacity. Due to the conditions of the existing siphons, the city decided it would be too much of a risk to rehabilitate or rebuild.

2. Jefferson Street and Rock Creek Siphons

Because the existing Liberty Street and Rock Creek siphons will be abandoned in the future, all dry and wet-weather flows need to be conveyed across the river by the new siphon. Therefore, the modified configuration requires a new Rock Creek siphon along with a proposed Jefferson Street double-barrel siphon to cross the Sandusky River.

Benner Interceptor

1. Extend Benner Interceptor to Lindsay and Market

This option involves locating the Benner inlet at West Market Street and Lindsay Avenue and extending the Benner Interceptor an additional 1,870 LF compared to the other two

alternatives. This was determined not to be feasible due to a vertical conflict with an existing 54-inch storm sewer at the proposed crossing near the bike trail.

2. *Route Benner Interceptor to North of Bike Trail*

This option involves installing the Benner Interceptor parallel to the existing 54-inch storm sewer within private property boundaries to avoid crossing the existing 54-inch storm sewer at the bike path. This would require permanent easements and an access roadway for long-term maintenance, which is not preferred.

3. *Lower Existing 54-inch Storm Sewer*

This option involves lowering 100 LF of existing 54-inch storm sewer under the proposed Benner Interceptor near the bike trail crossing. This would allow the Benner Interceptor to be installed over the existing storm sewer to avoid the crossing conflict, saves on sewer depth and excavation for the entire length of the Benner Interceptor and provides increased flexibility in the design at the tie-in location with the Main Interceptor.

Selected Alternative

The Main Interceptor connector involves constructing approximately 850 LF of 18-inch to 48-inch diameter sanitary sewer that will be conveyed to the proposed HRT facility. Additional work will also include the construction of the HRT diversion chamber and the Jefferson Street siphon entry and exit chambers, as well as the rehabilitation of the existing Rock Creek siphon entry and exit chambers and Liberty Street siphon entry chamber.

The proposed siphon work includes a new Rock Creek siphon under Rock Creek, using 40 LF of 24-inch siphon installed by horizontal directional drilling (HDD). Additionally, 1,100 LF of 24-inch sanitary siphon will be installed underneath the Sandusky River by HDD for the new Jefferson Street siphon.

The Benner Interceptor portion of the project involves constructing 5,390 LF of 30-inch to 42-inch diameter sanitary sewer within the roadway right-of-way. The existing storm sewer will be lowered under the Benner Interceptor near the bike trail crossing.

Additional work for the Benner Interceptor includes the installation of a pump station on South River Road near the intersection of South Sandusky Street. An additional sewer is to be built along Carl Street to service homes along the Sandusky River where the existing sewer is to be abandoned due to difficulties in maintenance along the riverbank. Sanitary diversion structures for CSOs 9, 12, 15 and 16 will also be replaced and an existing storm culvert underneath an unnamed tributary to Sandusky River will be replaced.

See figures 2 and 3 for the proposed project locations.

Implementation

Tiffin requested \$32,254,688 from the Ohio WPCLF at the standard rate of 3.56% to cover the cost of this project. Tiffin is eligible to receive up to \$4 million of their loan in the form of principal forgiveness. During the 30-year loan period, Tiffin could save approximately \$15,411,064 by using

WPCLF dollars at this rate, compared to the current market rate of 4.86%. Interest rates are set monthly and may change for a later loan award.

The city indicated that no rate increases are associated with this specific project. Under the current ordinance, there is a 5% annual increase to support upcoming LTCP projects. Tiffin reports that the expected average annual residential sewer bill in 2030 will be \$731.55 (\$60.96 monthly), which is 1.3% of the median household income for Tiffin (MHI; \$55,700) and is greater than the Ohio average annual sewer bill of \$528.

Construction is expected to begin after loan award and will be completed by December 2028.

Public Participation

The City of Tiffin has utilized social media, public city council meetings, press releases distributed to local media outlets including radio and newspaper, as well as personal letters and door hangers as platforms for notifying the public of the LTCP and associated projects.

Specifically for the Interceptor Upgrade Project, there have been public meetings pertaining to the legislation associated with authorizing the acceptance of the WPCLF loan and bidding the construction contract for the project. Each city council meeting in which the legislation was discussed was advertised and allowed for public input. All city council meetings are broadcast live via Facebook, with recordings of the meetings published on the city's website. Additionally, the city engineer provides city council and the general public with an annual update including updates to the LTCP and associated projects. The City of Tiffin also utilizes its city website to provide updates to current projects.

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

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.

Noise, Air Quality, Traffic, Safety, and Aesthetics

Heavy machinery that can emit temporary daytime noise may be involved and some traffic interruptions may occur; however, all work will occur within city-owned property, the roadway right-of-way and bike trail. Construction will be broken down into 13 phases, and all streets will still maintain local access. The bike trail will be closed with signage at South Sandusky Street and Hopewell Avenue during Phase 9 only.

Temporary, insignificant increases in fugitive dust and local air pollution from construction vehicle exhaust, like that of vehicles regularly transiting the area, are expected. It will be the contractor's

responsibility to implement construction best management practices to limit erosion, sediment, noise, dust, traffic disruptions, and like factors throughout the duration of the project. Disturbed surfaces will be restored upon construction completion.

Surface Water Resources and Aquatic Habitat

The siphon will be installed underneath the Sandusky River using HDD. The United States Army Corps of Engineers (USACE) has issued Nationwide Permit (NWP) 58, *Utility Line Activities for Water and Other Substances*, for this work. Additionally, 46 LF of fill will be placed below the ordinary high-water mark (OHWM) of an unnamed tributary to Sandusky River to replace an existing storm culvert, and 40 LF of temporary fill will be placed within Rock Creek to repair a siphon entry chamber. USACE has issued NWP 3, *Maintenance*, for this work. In-water work in the Sandusky River is prohibited between March 1st and June 30th to preclude adverse impacts on the spawning, nursery and feeding activities of indigenous fish species. All water in the Sandusky River will be immediately returned to the downstream portion of the project area so that sufficient flow of water is maintained at all times to sustain aquatic life downstream.

Terrestrial Habitat, Fish and Wildlife, and Endangered Species

Some tree removal may occur for the sewer installation. Tiffin has agreed to follow the standard tree clearing dates of October 1st to March 31st to protect listed endangered and threatened bat species.

Tiffin coordinated with the Ohio Department of Natural Resources (ODNR) for any concerns of impacts to freshwater mussels in the Sandusky River and Rock Creek. The siphon under the Sandusky River will be installed by HDD. The entry and exit pads for HDD activities are set back from the top-of-bank, and no disturbances below the OHWM are planned. Additionally, the proposed modifications to the existing siphon entry chamber at Riverside Drive and Jefferson Street will only have temporary construction activities below the OHWM. Substrates at this location and elevation are dry during normal flow conditions, and work is anticipated to begin during low-flow conditions. ODNR concurred that no mussel impacts are likely to occur as a result of the project activities.

Floodplains

The proposed sewer installation work will occur within the designated 100-year floodplain zone of the Sandusky River; however, the work is located outside of the existing flood walls along the Sandusky River and is not within the natural floodway area. The flood walls create an isolation barrier between the areas of work and the river. Tiffin has coordinated review of this project with the local floodplain administrator to ensure compliance with all local floodplain regulations. There are no short-term or long-term significant adverse impacts to the floodplain anticipated as a result of the proposed project.

Wild and Scenic Rivers

The proposed project falls within the 1,000-foot Wild and Scenic Rivers buffer of the Sandusky State Scenic River; however, it is within municipal corporation limits, so it is not subject to review and approval in accordance with the Ohio Scenic River Law. Tiffin will implement the Division of Natural Areas and Preserve's provided recommendations in regard to best management practices for erosion control, storage of fuels, spill prevention, material disposal, and clearing and grubbing.

Additionally, all sub-surface work will be installed by HDD with geotechnical data collected and coordinated with ODNR beforehand to avoid frac-outs, as well as locating the bore pits and all excavated material outside of the 100-year flood elevation of the Sandusky River. Tiffin will contact the Northwest Scenic Rivers Manager prior to the commencement of work as well as prior to the completion of the project to ensure protection measures are being properly implemented.

Wetlands

One Category 2 forested wetland is located close to a CSO sanitary diversion structure replacement that is part of the Benner Interceptor project. A total of 0.05 acres of wetland impacts will occur due to this work. The Ohio EPA granted authorization of the proposed impacts under the Isolated Wetland General Permit (Level One) for filling Category 2 isolated wetlands. Mitigation is required at a rate of 2.5 times the size of the area being impacted; therefore, Tiffin has reserved 0.2 acres of forested wetland credits using The Nature Conservancy's In-lieu Fee program.

Archaeological and Historical Resources

Numerous architectural resources and one historic district are located within one mile of the project area; however, the sewer installation will take place within the roadway right-of-way, bike trail and previously disturbed areas from existing utility infrastructure. The surrounding area primarily consists of single-family residential lots that line the roadway. It is unlikely that intact archaeological resources are present. In the event that archaeological discoveries are made during construction, contractors and subcontractors are required under Ohio Revised Code Section 149.53 to notify the Ohio State Historic Preservation Office of any archaeological discoveries in the project area and to cooperate with archaeological and historic survey and salvage work when appropriate.

Unaffected Features

The following resources are not present and therefore will not be impacted by this project: Coastal Zones, Groundwater Resources, Sole Source Aquifers and Source Water Assessment and Protection areas, Prime Farmland, and Recreational Land. Additionally, there will be no change in current Energy Use as it pertains to public space, nor will there be any impacts to drinking water or Local Economy.

Conclusion

Based upon Ohio EPA's review of the planning information and the materials presented in this Environmental Assessment, 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. Once implemented, the project will complete a portion of the first phase of the LTCP, reduce river water intrusion, eliminate/reduce CSOs, and protect the health of residents and streams within the area.

Contact information

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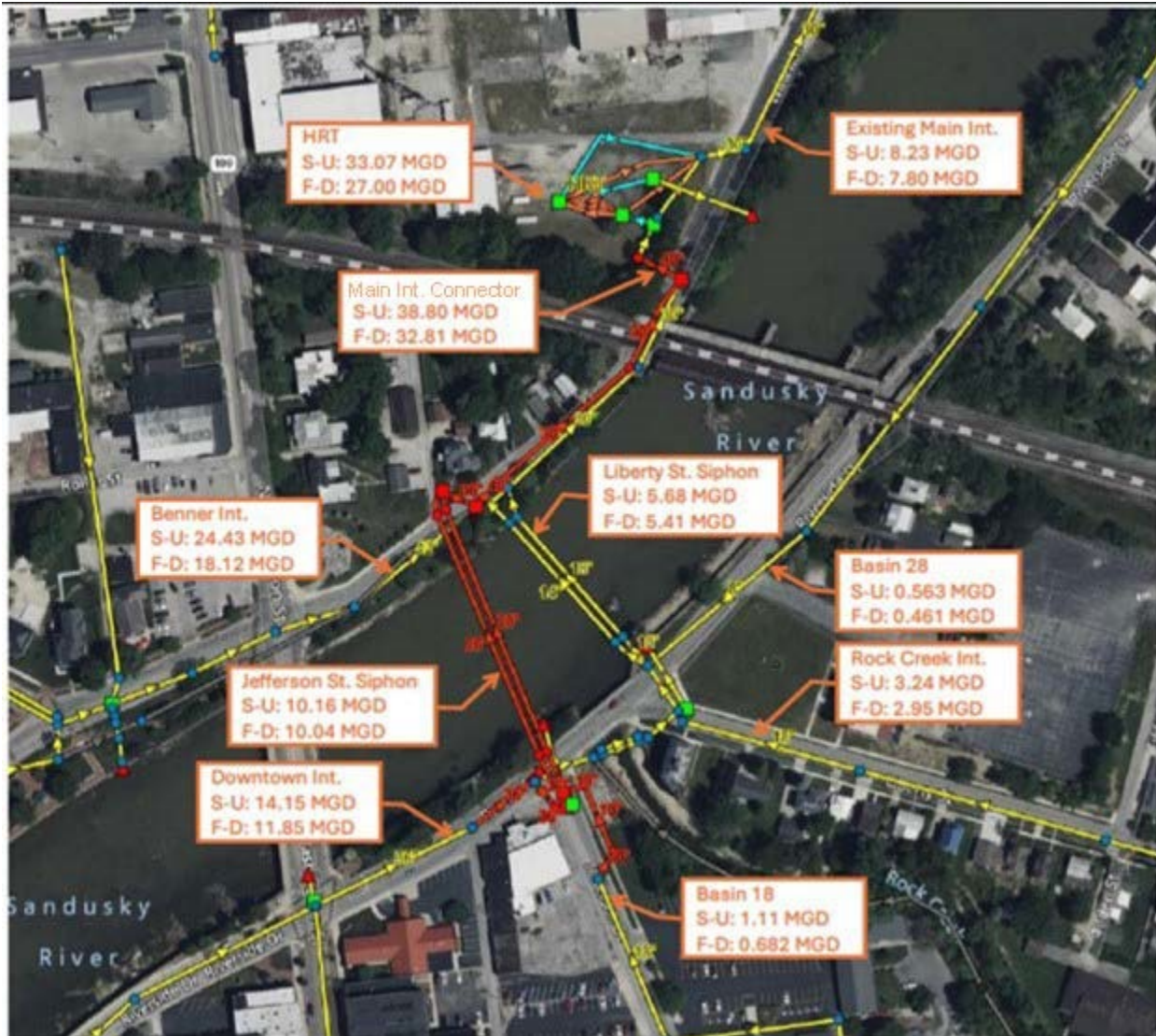


Figure 2. Main Interceptor and Jefferson Street siphon project location (red)

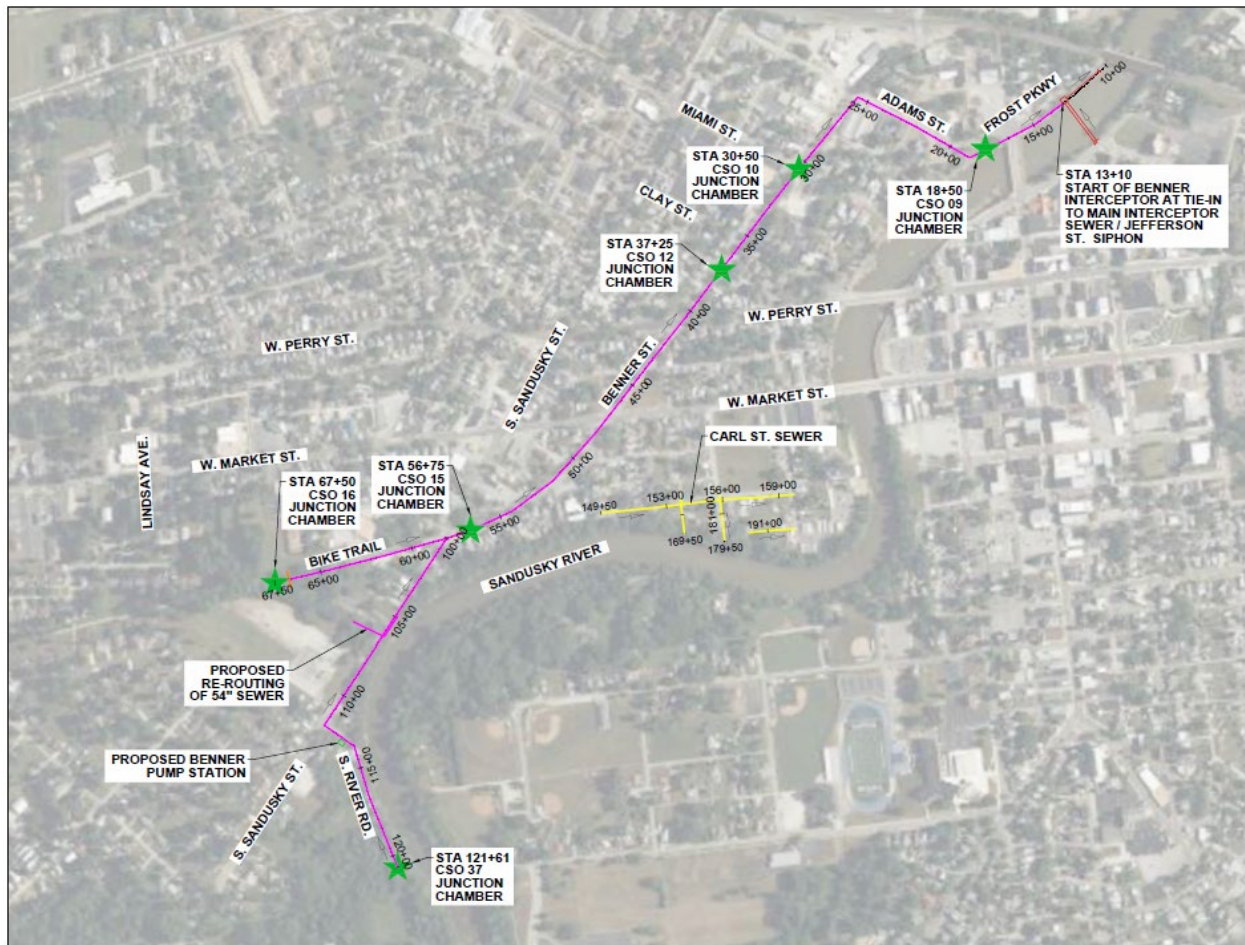


Figure 3. Benner Interceptor (purple) and Carl Street sewer replacement (yellow) project location