March 29, 2024

Limited Environmental Review and Finding of No Significant Impact

City of Willard – Huron County
US 224 Water Tower Rehabilitation and Coating
Loan number: FS390996-0013

The attached Limited Environmental Review (LER) is for a water tower rehabilitation and improvements project in Willard 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

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

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LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: US 224 Water Tower Rehabilitation and Coating

Applicant: City of Willard
631 South Myrtle Avenue
Willard, Ohio 44890

Loan Number: FS390996-0013

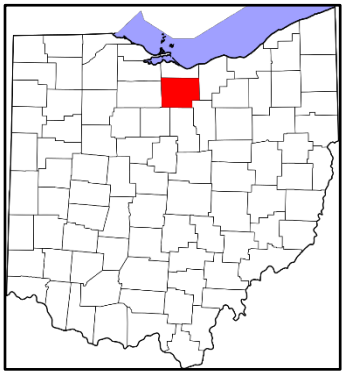

Figure 1. Huron County

Project Summary

The City of Willard, in Huron County (Figure 1), has requested $764,382 from the Ohio Water Supply Revolving Loan Account (WSRLA) to help fund the US 224 Water Tower Rehabilitation and Coating project. This project involves maintenance and improvements of the water tower located off Woodbine Avenue. Rehabilitating the water tower will improve Willards's ability to maintain safe and reliable water service while reducing long-term costs.

History & Existing Conditions

Willard owns and operates a public water system (PWS) comprised of a water treatment plant (WTP), two water towers, and a network of distribution mains (approximately 55 miles). Willard sources water from the west branch of the Huron River and pumps the raw water to a 215-acre upground reservoir that holds 2.3 billion gallons.

Water storage and system pressure are maintained by the two elevated storage tanks (water towers) with a total storage capacity of 1.3 million gallons. Currently the WTP's average daily demand is approximately 1.3 million gallons per day (MGD) and the system has a population of 9,979 people.

The water tower located along Woodbine Avenue has served the City of Willard since 1958. The last rehabilitation occurred 25 years ago and the water tower is currently in need of additional rehabilitation to increase its lifespan. A 2021 inspection of the 500,000-gallon double ellipse elevated water storage tank revealed the exterior and interior were last coated in 1999. Numerous coating failures were discovered throughout the exterior coating including rust undercutting, topcoat delamination, rust bleed through, and erosion. The wet interior coating is in good condition overall with no significant deterioration below the high-water level. Above the high-water level the coating is deteriorating at the open lap seams.

Based on the condition of the water tower, rehabilitation is necessary to ensure safe and reliable water service is maintained. Willard has determined that it is more cost effective to rehabilitate the tank rather than replace their water tower with a new one.

Project Description

Work for this water tower rehabilitation project (Figure 2) includes the abrasive cleaning and repainting of the exterior. Total removal is recommended due to the widespread coating failures and the exterior has likely been overcoated multiple times and cannot support additional coats. The expected life of this material is fifteen years and can be overcoated two additional times to extend the total life of the coating to approximately 45 years before total removal would be necessary.

Additional work includes installing rigging couplings on the roof for fall prevention, installing rigging couplings on the bowl, replacing the wet interior roof hatch with a 30-inch hatch, installing fall prevention on the exterior leg ladder, replacing the sidewall/roof ladder with a vertical ladder and a step-off platform, and installing a wet interior ladder with a fall prevention device.

Due to the presence of lead in the exterior of the existing water tower, the contractor will be required to implement necessary protocols to maintain a safe working environment for workers and nearby residents during demolition and to dispose of all hazardous waste according to local, state, and federal regulations.

Figure 2. Location of Willard's water tower

Implementation

Willard proposes to borrow $764,382 from the Ohio WSRLA at the 1% hardship rate to cover the cost of construction. Borrowing this amount in WSRLA monies could save Willard $117,660 over the 10-year loan term compared to the current market rate of 3.73 percent.

The debt associated with this project will be recovered from monthly user charges. Under the current ordinance, water rates are scheduled to increase by 8.3 percent in 2024. Willard reports that the expected average annual residential water bill will be $478.32 upon project completion. This represents one percent of the median household income for Willard (MHI; $46,679) and is slightly higher than the Ohio average annual water bill of $477.

Construction is anticipated to begin following loan award and will be complete in 2025.

Public Participation

The water tower and proposed project have been discussed during Willard city council meetings where the public is welcome to attend. Council meetings are held the first and third Mondays of the month. The city's website allows for review of council meeting minutes and legislation. A local newsgroup also wrote an article on the proposed project. No branding of the tower has been decided yet to date, but the community will be consulted if any changes will be made to the current design.

Ohio EPA is unaware of significant controversy about or opposition to this project. Ohio EPA will make a copy of this document available to the public on the following webpage and will 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 a PWS which involves the replacement of an existing water tower. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect, will have no effect on high-value environmental resources, and will require no specific impact mitigation. Rehabilitation of the existing water tower will take place on Willard-owned property where there is no unique, sensitive, or otherwise valuable environmental resources. No tree removal is necessary. Based on the nature and location of the project, no specific measures beyond standard construction best management practices (i.e., controls for erosion, sediment, traffic, dust, noise, etc.), and the demolition and disposal protocols previously described, are anticipated to be necessary.

Is cost effective. Willard has determined that rehabilitation of the tower is the most cost-effective alternative for ensuring reliable and safe water supply for city residents. The new exterior coating extends the total life of the coating to approximately 45 years before total removal would be necessary.

Is not a controversial action. Willard's water rate schedule is expected to generate the revenue necessary to cover repayment of loans borrowed for this 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. Willard does not anticipate substantial growth in the next 20 years. This project will have no effect on Willard's PWS (e.g., withdrawal, treatment, storage, distribution, usage, etc.).

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 will have long-term benefits associated with the provision of safe and adequate water supply and pressure to support the needs of Willard water customers.

Contact Information

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