MEMORANDUM

TO: NEFCO General Policy Board

FROM: Joseph Hadley Jr., Executive Director

DATE: September 21, 2016

SUBJECT: Consideration of an amendment to the Clean Water Plan to modify the facilities planning area (FPA) boundary and wastewater prescriptions for the Alliance FPA in order to include the Village of Limaville

What's being requested:
A modification of the Alliance FPA boundary to include the Village of Limaville and a small portion of Lexington Township, between the Village and the City of Alliance. Also, a wastewater prescription is provided for the Village, and minor updates to prescriptions within the City. This amendment is being requested by the Stark County Metropolitan Sewer District (SCMSD) on behalf of the City of Alliance.

Background (adapted from information provided by the Stark County MSD as received from the City of Alliance):
The Village of Limaville was formed around 1830 and is considered to be the oldest incorporated Village in Stark County. Special legislation has been passed to request that the Village become a part of the Metropolitan Sewer District.

The wastewater contamination caused by Limaville to the Alliance water supply was documented as far back as 1898 by the Ohio State Board of Health “Report of an Investigation of the Rivers of Ohio as Sources of Public Water Supplies”. On a more recent note, the Ohio EPA in its 2006 Mahoning River TSD (Technical Support Document) documented that Limaville was a bacteria contributor due to being unsewered. The City of Alliance has installed an advanced oxidation process to mitigate the taste and odor caused by the algae growth as a result of the additional nutrients contained in the sewage washed into the water supply from unsewered surrounding communities.

Some progress has been made to mitigate the nutrient contributions from surrounding communities in that the Stark County Metropolitan Sewer District in partnership with the United States Army Corps of Engineers (USACE) has just completed a sewage collection system, storm water system and wastewater treatment plant in the most populated area of Marlboro Township. The Army Corps of Engineers has once again made monies available to assist with eliminating the discharge of untreated sewerage from the Village of Limaville and, once again, the Stark County Metropolitan Sewer District will partner with them to complete the project.
As in almost any project, the economics of construction play a major role in determining what type of infrastructure is installed. The project lends itself to a gravity sewer installation throughout the Village culminating in a sanitary lift station on the south side of the Village corporation limits. A long force main will be required to transport the Village’s wastewater to the City of Alliance’s wastewater treatment plant through the City’s main trunk sewer. A discussion between the Stark County Health Department and the Metropolitan Sewer District has resulted in a loosely enforced decision, which will not allow properties bordering the lift station’s force main to connect as long as the existing septic systems can be repaired. Both entities recognize that there may be some properties whose systems cannot be repaired in which case they may be required to connect to the Village’s force main.

The proposed gravity sewer in the Village is estimated at approximately 7,500 lineal feet, would serve to the east, west and southern boundaries of the Village corporation limits and serve to within approximately 1,000 feet of the northern boundary. The sewer system would drain by gravity to a sanitary lift station located at the extreme southern end of the Village’s corporation limit. The sanitary lift station will pump the wastewater through an 18,258 foot 8 inch force main to the City of Alliance’s main trunk flowing directly to the city’s wastewater treatment plant. The Stark County Metropolitan Sewer District will complete these tasks in general accordance with the April 2009 USACE Huntington District's "Local Sponsor Guide, Section 594 Ohio Environmental Infrastructure Projects", ASTM E 1527-05, the Council on Environmental Quality's regulations for Implementing NEPA (40 CFR 1500-1508), and the Corps of Engineers Procedures for Implementing NEPA (33 CFR 230).

**Facilities Planning Area (FPA) boundary:**
The current FPA boundary for the Alliance FPA is shown as Figure 1. The proposed amendment would modify the boundary to include the Village of Limaville and a portion of Lexington Township (Figure 2).

**Wastewater prescription changes:**
Currently, the Alliance FPA has no prescription listing for those areas expected to be sewered with sanitary sewers within the next twenty years. As a prescription will be required for the Village of Limaville with this proposed amendment and that sewers are not already in place, the City of Alliance will include the prescription for “areas expected to be served with sanitary sewers within the next twenty years” (orange). The text for this prescription is shown as Exhibit A. Limaville will use that prescription until the project is complete and sanitary sewers are available. When this occurs, a new amendment will be assembled to change the Village’s prescription to “areas currently served with sanitary sewers” (yellow).

As it is the wish of the City of Alliance that its FPA boundary be continuous and not create a series of isolated islands, a small section of properties outside of the Limaville Village corporation limits (Lexington Township) following Greenbower St. NE and S. Atwater Streets will be included in the facilities planning area. This designation follows property lines to reduce confusion as to the treatment options available for wastewater generated on each parcel. The City felt that the prescription in this area should be the
same as the area surrounding it that is also inside the existing Alliance FPA line. Thus, the existing prescription “Areas that will be Served by Home Sewage and Semi-Public Disposal Systems” would change under the proposed amendment to “Areas that will be Served by a POTW or by Home Sewage and Semi-Public Sewage Disposal Systems”. This prescription is represented by a light green color (Figure 2).

As part of this amendment, the City of Alliance has also requested that the wastewater prescription be updated for three areas of the city. These areas are shown on Figure 2 as “Amendment Area 2 and 3”, and on Figure 2A as “Amendment Area 4”. The areas would be shown as “Areas Currently Served with Sanitary Sewers” (yellow), changing from the current “Areas that will be Served by a POTW or by a Home Sewage of Semi-Public Disposal System” (light green).

Local governments and agencies affected by the amendment:
Affected local governments are the City of Alliance, Village of Limaville, and Lexington Township. The City is impacted due to the additional flow coming primarily from the Village. The City has the capacity to accept this flow.

Lexington Township is affected in a minor way by the expansion of the Alliance facilities planning area and the sewering of Limaville. With the lift station construction, the force main must be aligned through the township in order to access the Alliance collection system. As a result, the FPA line is aligned through a small portion of the township to reach the Village of Limaville.

The Stark County Metropolitan Sewer District is impacted because the Village recently passed legislation to allow the District to serve Limaville. Therefore the District will maintain the gravity sewer, the lift station and force main, bill the customers and reimburse the City of Alliance for treatment.

The Stark County Health Department will be affected in that their options change in the treatment of wastewater generated within the Limaville service area. Instead of requiring new home sewage treatment systems (HSTS) or repairs for failed systems, all properties fronting the proposed sanitary sewer will be ordered to connect. In addition, new homes or businesses within the Village will also be required to connect to the sanitary sewers. There will also be an option concerning the properties near the alignment of the sanitary force main in that if there is no possibility of repair or replacement of an HSTS serving a home fronting the sanitary lift station force main, the Health Department, with assistance from the SCMSD, may have the property tie into the force main. This project eliminates one of the high priority failing septic system areas reported by the Health Department in the recently released NEFCO report: Stark County Failing Home Sewage Treatment Systems Prioritization Analysis (2016).

Public Notification Efforts:
A legal advertisement was placed in the Repository on August 4th, 2016. A 15-day comment period was offered. (Copy attached as Exhibit B). No comments were received.
Request for comment letters were sent to the Village of Limaville, Lexington Township Trustees, Eastgate Regional Council of Governments, Stark County Health Department, the Stark County Regional Planning Commission and the Stark County Metropolitan Sewer District (SCMSD). Eastgate was contacted at the request of NEFCO because the Alliance FPA boundary extends into Mahoning County. Eastgate is the 208 planning agency for Mahoning and Trumbull Counties. A sample of the comment letter request is attached (Exhibit C).

To date, approval or response letters have been received from the Stark County Health Department, Stark County Metropolitan Sewer District, and the Eastgate Regional Council of Governments (Exhibit D). A request for comment letter was not sent to the City of Alliance, because the city and the SCMSD have a July 7, 2016 sewer service agreement for the Limaville project.

Staff recommendation:
Staff recommended approval of the amendment

Environmental Resources Technical Advisory Committee (ERTAC) Action:
The ERTAC performed a technical review of the proposed amendment at its September 7, 2016 meeting and recommended approval by the NEFCO Board.

NEFCO General Policy Board Action:
Approval of Resolution No. FY2017-002.
RESOLUTION OF THE GENERAL POLICY BOARD OF THE NORTHEAST OHIO FOUR COUNTY REGIONAL PLANNING AND DEVELOPMENT ORGANIZATION (NEFCO) APPROVING AN AMENDMENT TO THE CLEAN WATER PLAN TO MODIFY THE FACILITIES PLANNING AREA (FPA) BOUNDARY AND WASTEWATER PRESCRIPTIONS FOR ALLIANCE FPA IN ORDER TO INCLUDE THE VILLAGE OF LIMAVILLE

WHEREAS, NEFCO is the designated water quality management planning agency for Portage, Stark, Summit and Wayne Counties; and

WHEREAS, as part of that designation it is NEFCO’s responsibility to coordinate the use and update of its Clean Water Plan, also known as the 208 Plan; and

WHEREAS, NEFCO has been requested by the Stark County Metropolitan Sewer District on behalf of the City of Alliance to consider an amendment to the Clean Water Plan to modify the facilities planning area (FPA) boundary and wastewater prescriptions for the Alliance FPA in order to include the Village of Limaville; and

WHEREAS, this amendment will result in the FPA boundary being adjusted to include the Village of Limaville as well as selected land parcels in Lexington Township between the Village and the City of Alliance; and

WHEREAS, this amendment will establish the following wastewater prescription for the Village of Limaville: “Areas expected to be Served with Sanitary Sewers within the next 20 years” (orange); update the prescription within the FPA boundary in Lexington Township to indicate this area as: “Areas that will be Served by a POTW or by a Home Sewage of Semi-Public Disposal System” (light green); and update the prescription for selected areas in the City of Alliance to be “Areas Currently Served with Sanitary Sewers” (yellow); with the areas shown on this Amendment document as Figures 1, 2, and 2A as Amendment Areas 1 through 4; and

WHEREAS, the installation of sewers in the Village of Limaville is expected to significantly reduce nutrient contributions affecting algae growth in Deer Creek Reservoir, the drinking water source for the City of Alliance; and

WHEREAS, the Stark County Health Department, Stark County Metropolitan Sewer District, and the Eastgate Regional Council of Governments have indicated approval of the proposed amendment; and

WHEREAS, the Stark County Metropolitan Sewer District has complied with NEFCO’s Clean Water Plan amendment provisions regarding notification of the public; and

WHEREAS, the Ohio Environmental Protection Agency (Ohio EPA) has requested NEFCO’s approval of this amendment as a step in Ohio EPA’s permitting process; and

WHEREAS, the NEFCO Environmental Resources Technical Advisory Committee (ERTAC) performed a technical review of this requested amendment and recommended approval;
NOW, THEREFORE, BE IT RESOLVED that the NEFCO General Policy Board approves this amendment to modify the facilities planning area (FPA) boundary and wastewater prescriptions for the Alliance FPA in order to include the Village of Limaville. Furthermore, the Board directs staff to incorporate this amendment into NEFCO’s Clean Water Plan and to transmit pertinent amendment materials to the Village of Limaville, Lexington Township Trustees, Eastgate Regional Council of Governments, Stark County Health Department, the Stark County Regional Planning Commission, the Stark County Metropolitan Sewer District, and the Ohio EPA.

Certified as action taken by the NEFCO General Policy Board at its regular meeting held on September 21, 2016.

Bob Breneman, Secretary
NEFCO General Policy Board
Areas Expected to be Served with Sanitary Sewers within the Next 20 years (orange):

_Village of Limaville_ - This area contains some large undeveloped tracts of land and vacant lots subject to improvement. All new commercial, industrial, institutional, and residential subdivisions in the Limaville area will be required to connect to existing sanitary sewers for removal of sanitary wastewater and transportation to a publicly-owned treatment works (POTW). The developer shall be required to extend new sanitary sewer service from the proposed development to the existing sanitary sewer system that is served by a POTW. Existing non-single-family private treatment systems which fail to operate properly will be required to connect to and/or provide sanitary sewer service to ensure that wastewater will be treated at an existing POTW. Failing HSTS’s serving single, two, and three-family homes shall be abandoned in accordance with Ohio Administrative Code 3701-29-02. Variances to any provision of this prescription may be granted by the local Board of Health based on sanitary sewer availability, threat to the public health, other unique conditions. Publicly operated wastewater treatment plants, commonly referred to as “package plants,” will not be approved for new residential, commercial or industrial subdivisions.
Legal Notice
The Stark County Metropolitan Sewer District, on behalf of the City of Alliance, is soliciting comments on a proposal to modify the NEFCO 208 Clean Water Plan. As part of the proposed project, the wastewater generated by the Village of Limaville in Lexington Township, Stark County would be collected through a gravity sanitary sewer system and pumped to the City of Alliance for treatment.

As Alliance will be treating the wastewater generated by Limaville, it is proposed that their facility planning area be adjusted to encompass the Village. A small portion of additional area outside the Village will be included to make the facility planning line contiguous. The Village’s prescription will become “areas expected to be sewered with sanitary sewers within the next twenty years (orange)” due to the fact that the Village has no current sewer. However, once the project is constructed and Limaville has the availability of a sanitary collection system, an amendment will be assembled for approval to change the prescription to yellow (“areas currently served with sanitary sewers”).

Alliance is also updating 3 prescription areas within the City corporation limits. All areas have changed from “Areas that will be served by a POTW or by a Home Sewage or Semi-Public Disposal System” (green) to “Areas currently sewered with Sanitary Sewers” (yellow). The first area is located east of SR 62, north of Cambridge, west of Klinger and south of Fairfield. The second area is east of Liberty, north of Elbrook, west of the County line, and south of Armour. The final area is located east of Watson, north of the Alliance Country Club, west of Fairway and south of Milton.

Comments will be accepted until 5:00 pm, August 15, 2016. Comments, questions or requests for additional information may be directed to:

Scott Ellsworth
Stark County Metropolitan Sewer District
P.O. Box 9972
1701 Mahoning Rd.NE
Canton, OH 44711-0972
(330) 451-2366 PHONE
(330) 453-9044 FAX
Seellsworth@Starkcountyohio.gov
July 27, 2016

Lexington Township Trustees
14555 Gaskill Dr., NE
Alliance, OH  44601

Attn. Mr. James Mathews, President

Re: Alliance FPA line and Prescription Changes and Updates

Dear Mr. Mathews,

The Stark County Metropolitan Sewer District, on behalf of the City of Alliance, is soliciting comments on a proposal to amend the NEFCO 208 Clean Water Plan. The District is designing a sanitary collection system and lift station to serve the Village of Limaville, which was discovered to have many failing septic systems within its limits. These failing systems contribute to high nutrient loading of the Deer Creek Reservoir, which supplies drinking water to the City of Alliance. To help mitigate the nutrient pollution challenge, the US Army Corps of Engineers has provided the Village with a grant to assist in the project. This amendment is necessary so that the Ohio EPA can issue a permit to install, allowing the project to move forward.

As part of the proposed project, the wastewater generated by the Village would be collected through a gravity sanitary sewer system and pumped to the City of Alliance for treatment. To date, the Village has no facility plan or description as to how its wastewater is collected or treated. With the design of a sanitary collection system, the Village must now be assigned a facility area and prescription as to its wastewater treatment options.

The City of Alliance will be treating the wastewater generated by Limaville and it is proposed that their facility planning area be adjusted to encompass the Village. A small portion of additional area outside the Village will be included to make the facility planning line contiguous. The Village’s prescription will become “areas expected to be sewered with sanitary sewers within the next twenty years (orange)” due to the fact that the Village has no current wastewater collection system. However, once the project is constructed and Limaville has the availability of a sanitary system, a new amendment will be assembled for approval to change the prescription to yellow (“areas currently served with sanitary sewers”). Figure 1 exhibits the existing facility planning area and prescriptions. Figures 2 and 2A show the proposed changes.

As part of this proposed amendment, the City of Alliance is also requesting the addition of a new wastewater treatment prescription as it currently does not include “areas expected to be sewered with sanitary sewers
within the next twenty years (orange)”. This prescription is similar to other “orange” prescriptions in the Stark County system and is described below:

**Areas Expected to have sewers installed within the next 20 years (orange):**

**Village of Limaville** - This area contains some large undeveloped tracts of land and vacant lots subject to improvement. All new commercial, industrial, institutional, and residential subdivisions in the Limaville area will be required to connect to existing sanitary sewers for removal of sanitary wastewater and transportation to a publicly-owned treatment works (POTW). The developer shall be required to extend new sanitary sewer service from the proposed development to the existing sanitary sewer system that is served by a POTW. Existing non-single-family private treatment systems which fail to operate properly will be required to connect to and/or provide sanitary sewer service to ensure that wastewater will be treated at an existing POTW. Failing HSTS’s serving single, two, and three-family homes shall be abandoned in accordance with Ohio Administrative Code 3701-29-02. Variances to any provision of this prescription may be granted by the local Board of Health based on sanitary sewer availability, threat to the public health, other unique conditions. Publicly operated wastewater treatment plants, commonly referred to as “package plants,” will not be approved for new residential, commercial or industrial subdivisions.

Finally, Alliance is requesting a prescription update for three (3) areas within the City that have changed from “Areas that will be served by a POTW or by a Home Sewage or Semi-Public Disposal System” (green) to “Areas currently sewered with Sanitary Sewers” (yellow). The first area is located east of SR 62, north of Cambridge St., west of Klinger Ave. and south of Fairfield Rd. The second area is east of Liberty Ave., north of Elbrook St., west of the County line, and south of Armour St. The final area is located east of Watson, north of the Alliance Country Club, west of Fairway and south of Milton. Figure 1 shows the current prescription plan while Figures 2 and 2A exhibit the proposed changes.

**All comments on this amendment proposal must be submitted prior to 5:00 pm on Friday September 2, 2016.**

All comments will become part of the package provided to NEFCO for consideration of this amendment. We are not soliciting for approval letters only, but also for comments of concern, support or questions. Please send your comments, questions and needs for additional information to:

Scott Ellsworth  
Stark County Metropolitan Sewer District  
P.O. Box 9972  
1701 Mahoning Rd.NE  
Canton, OH 44711-0972  
(330) 451-2366 PHONE  
(330) 453-9044 FAX  
Seellsworth@starkcountyohio.gov

Respectfully,

Scott E. Ellsworth. P.E.  
Assistant Sanitary Engineer  
Stark County Metropolitan Sewer District

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**As per the Stark County MSD, the following entities were asked to comment:**  
The Village of Limaville,  
Lexington Township Trustees,  
Eastgate Regional Council of Governments, Stark County Health Department, the Stark County Regional Planning Commission and the Stark County Metropolitan Sewer District.
Exhibit D
Responses to Request for Comment Letters
September 2, 2016

Scott Ellsworth
Stark County Metropolitan Sewer District
P.O. Box 9972
Canton, OH 44711-0972

RE: Alliance FPA Line and Prescription Changes and Updates

Dear Mr. Ellsworth:

I am writing in response to your letter dated August 1, 2016, regarding the Alliance FPA line and prescription changes. This department supports your effort to amend the NEFCO 208 Clean Water Plan in the fashion you described in the letter. We feel that this will aid in the advancement of sanitary sewers into areas of Lexington Township, as well as the Village of Limaville, where aging septic systems will begin or have already caused sewage problems.

Thank you for your effort in this matter. If I may be of further assistance, feel free to contact me at (330)493-9904, extension 224.

Sincerely,

Paul DePasquale, R.S., M.P.A.
Director, Environmental Health
August 25, 2016

Scott Ellsworth, P.E.
Stark County Metropolitan Sewer District
1701 Mahoning Rd. NE
Canton, OH  44711-0972

RE: Eastgate’s review of Alliance FPA line and Prescription Changes and Update

Dear Mr. Ellsworth,

The Eastgate Regional Council of Governments (Eastgate) received the Stark County Metropolitan Sewer District’s letter requesting comments for the Alliance FPA line and Prescription Changes and Updates. Eastgate reviewed the details of the project and although it does not affect Eastgate’s planning region per say, we would support the amendment given the confidence the Alliance WWTP can continue to adequately service existing areas in Smith Township, Mahoning County.

The Alliance WWTP currently services a small, southwest area of Smith Township, Mahoning County, that was added to the Alliance 208 FPA in 2009 (NEFCO Resolution No. FY2009-016 and Eastgate G&P Resolution #020-2009). The amendment was a joint project between the City of Alliance, Smith Township, and the Mahoning County Sanitary Engineer’s Office to provide much needed infrastructure to alleviate failing home sewage treatment systems. The collaboration and the immediate accessibility to infrastructure, afforded by the City of Alliance, made the project a reality for the county and township’s residents. Eastgate requests assurance that should additional residents within Mahoning County’s portion of the Alliance 201 FPA require sanitary sewer service, the Alliance WWTP would have adequate capacity to treat additional generated waste. It is noted no future plans exist to extend sanitary service beyond the current serviced areas.

Like NEFCO, Eastgate’s planning region includes several surface water lakes and reservoirs that serve large populations with drinking water. As an advocate for drinking water protection, Eastgate supports any and all sanitary sewer projects mindful of protecting and enhancing existing water quality and protecting valuable drinking water supplies such as Deer Creek Reservoir. If Eastgate can be of further assistance, please feel free to contact me at (234) 254-1520.

Sincerely,

EASTGATE REGIONAL
COUNCIL OF GOVERNMENTS

Stephanie Dyer
Environmental Program Manager

RECEIVED
AUG 29 2016
STARK COUNTY
SANITARY ENG. DEPT.
August 29, 2016

Northeast Ohio Four County Regional Planning
And Development Organization
175 S. Main Street, Room 211
Akron, OH 44308

Attn. Mr. Joseph Hadley, Executive Director

Re: Alliance FPA Line and Prescription Changes and Updates

Dear Mr. Hadley,

The Stark County Metropolitan Sewer District, having assembled the Alliance FPA line and prescription change amendment and, in participating in the design and implementation of the Limaville sanitary collection and transport project, realize the importance of removing wastewater-based nutrients from the Deer Creek reservoir and, subsequently, the drinking water source for the city of Alliance. In supporting this project we take on the added responsibility of designing the project, oversight of the construction and operation and administration of the completed system. We are willing to take on this additional responsibility knowing that the project will positively impact both the environment and the City of Alliance.

We also realize that, as part of the Clean Water Plan, the area must be assigned both a facility planning area and a wastewater treatment prescription. We have no objections to either the facility area designation or the prescription assignments. Both seem like the logical progression as to the direction and methodology for the treatment of the area’s wastewater. The Alliance WWTP is considered a “regional plant” and was designed to include the surrounding service area. The proposed prescription evolution for the Village appears logical and follows the NEFCO 208 Clean Water Plan rules. We approve of the amendment and have no objections to its implementation.

Please feel free to contact me with questions or need for additional information.

Respectfully,

[Signature]

James F. Troike, P.E.
Sanitary Engineer
Stark County Metropolitan Sewer District

C: Scott Ellsworth
Luke Dostal
Limaville NEFCO file
Figure 1
Alliance Facilities Planning Area
Proposed Amendment Areas
208 Clean Water Plan Amendment

Table 1

- Areas Currently Served with Sanitary Sewers
- Areas Expected to be Served with Sanitary Sewers within the Next 20 years
- Areas that will be Served by a POTW or a Home Sewage or Semi-Public Disposal System
- Areas that will be Served by a POTW or a Home Sewage or Semi-Public Disposal System

Production Date: July 20, 2016

* Please see the Clean Water Plan text for a complete explanation of the mapping categories.

* Please see the FPA Reference Map (figure 3-1a) for names of adjacent FPAs.
Figure 2
Alliance Facilities Planning Area
208 Clean Water Plan Amendment
Proposed Wastewater Treatment Prescriptions

* Please see Clean Water Plan text for a complete explanation of the mapping categories.
* Please see the FPA Reference Map (figure 3-1a) for names of adjacent FPAs.
Figure 2A
Alliance Facilities Planning Area
208 Clean Water Plan Amendment
Proposed Wastewater Treatment Prescription

- Areas Currently Served with Sanitary Sewers
- Areas Expected to be Served with Sanitary Sewers within the Next 20 years
- Areas that will be Served by Home Sewage and Semi-Public Sewage Disposal Systems
- Areas that will be Served by a POTW or by a Home Sewage or Semi-Public Sewage Disposal System

* Please see Clean Water Plan text for a complete explanation of the mapping categories.
* Please see the FPA Reference Map (figure 3-1a) for names of adjacent FPAs.