M E M O R A N D U M

TO: NEFCO General Policy Board
FROM: Joseph Hadley, Jr., Executive Director
DATE: May 10, 2017
SUBJECT: Consideration of an Amendment to the Clean Water Plan for the Pond Brook Facilities Planning Area (FPA) to eliminate the boundary between the Pond Brook FPA and the Twinsburg FPA in order to consolidate the Pond Brook FPA into the Twinsburg FPA

What's being requested:
An amendment to NEFCO’s Clean Water Plan (208 Plan) is being requested by the County of Summit Department of Sanitary Sewer Services (DSSS) to eliminate the boundary between the Pond Brook Facilities Planning Area (FPA) and the Twinsburg FPA. The updated Twinsburg FPA will encompass the former Pond Brook FPA.

Background (adapted from information provided by County of Summit (DSSS):)
The WWTP #29 original construction dates from 1971 as a 0.065 MGD package plant. Around 1973 the plant capacity was expanded to 0.250 MGD through the addition of an above ground metal circular extended aeration package plant and tertiary sand filter, and conversion of the original facilities into an aerobic digester. A second 0.250 MGD above ground extended aeration unit and additional tertiary filter facilities were installed in 1997 to establish the current plant 0.50 MGD treatment capacity. In 2002 the oldest tank was fitted with new mechanisms and new top steel. Other improvements constructed since expansion of the plant to 0.50 MGD capacity included the conversion of the chlorine contact system to UV disinfection, installation of phosphorus removal facilities, and the addition of post-treatment aeration to raise the DO level of the effluent prior to discharge to Pond Brook.

The limited capacity of WWTP #29 made it unable to provide the service necessary for future development of the area. At the request of the County on July 1, 2014, a legislative action to accept an ADF of 0.650 MGD from the County of Summit at the Twinsburg WWTP was executed by the City of Twinsburg. This action will allow for the replacement of WWTP#29 by a 0.650 MGD pump station. The existing aeration tanks and digesters will be converted to holding tanks for storage of excessive infiltration and inflow generated by extreme wet weather conditions, or other daily flows under various emergency, or operating and maintenance situations.

Facilities Planning Area (FPA) boundary:
Figure 1a shows the current Pond Brook FPA, and the current Twinsburg FPA is shown as Figure 1b. The proposed amendment would eliminate the boundary between the two FPAs, and consolidate the former Pond Brook into the Twinsburg FPA (Figure 2).
Wastewater prescription change:
The wastewater prescriptions in the City of Twinsburg jurisdiction remain unchanged. Current Pond Brook Facilities Plan prescriptions have been revised to conform to the Twinsburg prescriptions as shown in Exhibit A (modifications are highlighted or shown as strikeouts), while maintaining County of Summit DSSS wastewater jurisdiction for the Village of Reminderville and Twinsburg Township.

Local governments and agencies affected by the amendment:
Affected local governments are the City of Twinsburg, City of Aurora, Village of Reminderville, Twinsburg Township, Portage County Water Resources, Twinsburg Water and Sewer District, and Summit County Public Health.

Public Notification Efforts:
On April 11, 2017, the County of Summit DSSS sent letters to all affected Management Agencies, local governments and appropriate agencies within the project area requesting comments on the proposed amendment (Exhibit B). To date, comment responses have been received from the Village of Reminderville, the Portage County Water Resources Department, and Twinsburg Township.

A public notice and request for comments was published in the April 4th and 13th, 2017 editions of the Akron Beacon Journal (Exhibit C). As of May 10th, 2017, DSSS has not received any public comments regarding the proposed amendment.

Staff recommendation:
Staff recommended approval of this amendment.

Environmental Resources Technical Advisory Committee (ERTAC) recommendation to the NEFCO General Policy Board:
The ERTAC recommended approval of this amendment for consideration by the NEFCO General Policy Board.

NEFCO General Policy Board Action:
Approval of Resolution No. FY2017-015.
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 THE POND BROOK AND TWINSBURG FACILITIES PLANNING AREAS (FPAs)

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 County of Summit Department of Sanitary Sewer Services (DSSS) to consider an amendment to the Clean Water Plan to modify the facilities planning area (FPA) boundary and wastewater prescriptions for the Pond Brook and Twinsburg FPAs; and

WHEREAS, this proposed amendment will eliminate the boundary between the Pond Brook FPA and the Twinsburg FPA in order to consolidate the Pond Brook FPA into the Twinsburg FPA; and

WHEREAS, this amendment would revise the wastewater prescriptions to conform to the Twinsburg FPA prescriptions, while maintaining County of Summit DSSS wastewater jurisdiction for the Village of Reminderville and Twinsburg Township; 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 former Pond Brook and Twinsburg FPAs. Furthermore, the Board directs staff to incorporate this amendment into NEFCO's Clean Water Plan and to transmit pertinent amendment materials to the City of Twinsburg, Village of Reminderville, Twinsburg Township Trustees, Twinsburg Water and Sewer Board, Summit County Public Health, County of Summit Department of Sanitary Sewer Services, County of Summit Department of Community and Economic Development, and the Ohio EPA.

Certified as action taken by the NEFCO General Policy Board at its regular meeting held on May 17, 2017.

Bob Breneman, Secretary
NEFCO General Policy Board
Pond Brook Facilities Planning Area
As shown in 208 Clean Water Plan

Areas Currently Served with Sanitary Sewers
Areas Programmed for Sewers within the next 20 years
Areas That Will be Served by On-Site Nondischarging Systems
Areas that will be served by a POTW or by On-site Nondischarging Systems
Parks and Natural Areas
Lakes and Ponds

FPA Boundary
Stream
Community Boundary
Road
Publicly Owned Wastewater Treatment Works (POTW)

Note: Base map reflects information updated as of 12/2016.

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

Northeast Ohio Four County Regional Planning and Development Organization, December 21, 2011.
Source: Ohio Department of Natural Resources, Division of Real Estate and Land Management; Summit County D.O.E.S.

Approved by the NEFCO General Policy Board
12/21/2011
Twinsburg Facilities Planning Area
208 Clean Water Plan Amendment

Areas Currently Served with Sanitary Sewers
Areas Programmed for Sewers within the next 20 years
Areas that will be served by a POTW or by On-site Nondischarging Systems
Parks and Natural Areas
Lakes and Ponds

Note: Base map reflects information updated as of 12/2016.

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

Northeast Ohio Four County Regional Planning and Development Organization, December 21, 2011.
Source: Ohio Department of Natural Resources; Division of Real Estate and Land Management; Summit County D.O.E.S.

Approved by the NEFCO General Policy Board
12/21/2011
PROPOSED
Twinsburg Facilities Planning Area
208 Clean Water Plan Amendment

Note: Base map reflects information updated as of 12/2016.

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

Areas Currently Served with Sanitary Sewers
Areas Programmed for Sewers within the next 20 years
Areas that will be served by a POTW or by On-site Nondischarging Systems
Parks and Natural Areas
Lakes and Ponds

FPA Boundary
Stream
Community Boundary
Highway
Road
Publicly Owned Wastewater Treatment Works (POTW)

0 4,000 8,000 Feet

Northeast Ohio Four County Regional Planning and Development Organization, December 21, 2011.
Source: Ohio Department of Natural Resources; Division of Real Estate and Land Management; Summit County D.O.E.S.

submitted to NEFCO 04/05/2017
Exhibit A

Proposed Changes to Clean Water Plan

Twinsburg Facilities Planning Area

I. Existing Situation
   A. County/Basin:
      Summit/Lake Erie
   B. Facilities Planning Area:
      I. Twinsburg
      II. Pond Brook (part of this area was previously referred to as Aurora Westerly)
   C. Designated Management Agency (DMA):
      I. Primary DMA
         a) City of Twinsburg
      II. Secondary DMA
         a) Summit County Metropolitan Sewer District SCMSD (Dept. of Sanitary Sewer Services)
         b) Twinsburg Water and Sewer District
         c) Portage County Water Resources (Portage County Regional Sewer District PCRSD)
   D. Publicly-Owned Treatment Works:
      Twinsburg WWTP, 3.4000 MGD Portage County Water Resources (Portage County Regional Sewer District PCRSD)
   E. Facilities Plan:
      I. John David Jones and Associates, Inc., The City of Twinsburg Facilities Plan, was submitted to Ohio EPA in December, 1985. However, the plan which was prepared by Finkbeiner, Pettis and Strout, was subsequently approved by Ohio EPA in March, 1986.
   F. Area Served:
      City of Twinsburg, Twinsburg Township, Village of Reminderville
   G. Receiving Stream:
      Tinkers Creek
   H. Contact Person/Address/Phone/Fax:
      Mr. Christopher Campbell, Public Works Director
      City of Twinsburg
      Division of Public Works
      10231 Ravenna Road
      Twinsburg, Ohio 44087
      Phone: (330) 963-6260
      Fax: (330) 963-3552
I. Population Served:
The population projections used in the 201 Plan and those in the NEFCO 208 Clean Water Plan are compared below.

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The above population projections (Approved 208) were prepared in 1990. Updated projections are scheduled to be prepared after county population projections are produced by the Ohio Department of Development Office of Strategic Research.

Note: Aurora Westerly projections were included by NEFCO for reference. These figures include population from Aurora.

II. Wastewater Treatment Planning Prescriptions and Wastewater Planning Options
Original source information provided by the City of Twinsburg’s Public Works Director, December 5, 2000 and by the Summit County Department of Environmental Services, May 1, 2000.

City of Twinsburg Jurisdiction
Areas Currently Sewered (yellow):
These areas are currently served with sanitary sewers that have been constructed and are currently in operation. However, there may be undeveloped tracts of land and/or single-family homes that are being served by household home sewage disposal treatment systems (HSDS) (HSTS) within this area. Existing HSDSs HSTSs shall be connected to the public sanitary sewer system upon failure. All new development and construction in the yellow areas of this facility planning area will be required to connect and/or provide sanitary service to ensure that wastewater will be treated and discharged at an existing publicly-owned treatment works.

Areas that will be served by a POTW or by on-site non-discharging systems (green):
These areas are currently not served with sanitary sewer and are predominantly rural in character with large undeveloped tracts of land and vacant lots subject to improvement. All new subdivision development, whether residential or non-residential, will be required to connect and/or provide sanitary service to ensure that wastewater will be treated at an existing POTW. Remote metes-and-bounds residential parcels may be improved with new HSDSs HSTSs provided that the local health department finds that soils are suitable
or the other mutually agreeable methods of wastewater treatment can be obtained without causing off-lot discharge of effluent. Existing non-single family private treatment systems which fail to operate properly will be required to connect and/or provide sanitary service to ensure that wastewater will be treated at an existing POTW. Failing HSDSs HSTSs service servicing single-family homes shall be abandoned in accordance with Ohio Administrative Code 3701-29-02 (OAC 3701-29-02). However, exceptions may be (granted/requested) based on sewer availability, soil conditions, extent of failure, type of replacement system and cost of repair, provided that the local health department finds that soils are suitable to assure there will be no off-lot discharge of effluent and there is no conflict with OAC 3701-29-02.

**Summit County Department of Environmental Services Jurisdiction**

*County of Summit Department of Sanitary Sewer Services Jurisdiction – Village of Reminderville, Twinsburg Township*

### Areas Currently Sewered (yellow):

These areas are currently served with sanitary sewers that have been constructed and are currently in operation. However, there may be undeveloped tracts of land and vacant lots subject to improvement. Due to the limited capacity of the County’s Aurora Shores POTW capacity may not be available for new development. All new development and construction in the yellow areas of this facilities planning area will be required to connect and/or provide sanitary service to ensure that wastewater will be treated at an existing POTW. Failing HSDSs HSTSs serving single-family homes shall be abandoned in accordance with Ohio Administrative Code 3701-29-02. Existing non-single-family private treatment systems which fail to operate properly will be required to connect to and/or provide sanitary service to ensure that wastewater will be treated at an existing POTW.

### Areas That Will be Served by a POTW or by On-Site Non-discharging Systems (green):

The Pond Brook area of Summit County is predominantly rural with large undeveloped tracts of land and vacant lots subject to improvement and has no existing subdivisions using HSDSs HSTSs for wastewater treatment. All new subdivision development, whether residential or non-residential, and all other new non-residential, and new multi-family residential development, will be required to connect to and/or provide sanitary service to ensure that wastewater will be treated at an existing POTW. Remote metes-and-bounds residential parcels may be improved with new HSDSs HSTSs provided the local health department finds that soils are suitable or that other mutually agreeable methods of wastewater treatment can be obtained without causing off-lot discharge of effluent. Existing non-single-family private treatment systems which fail to operate properly will be required to connect to and/or provide sanitary service to ensure that wastewater will be treated at an existing POTW. Failing home sewage treatment systems (HSTSs) serving single-family homes shall be abandoned and the home connected to sanitary sewer service in accordance with Ohio Administrative Code (OAC) 3701-29-02(M) unless sewer service is not accessible, in which case the HSTS must be repaired or replaced to meet the standards found within OAC 3701-29.

It is anticipated that sanitary sewer will be available in the uncertain future through efforts of Summit County to establish a major POTW to serve the area or through negotiations with any of the Cities of Twinsburg, Aurora and Solon. Until that time, it is recommended that no major subdivisions or new multi-unit development occur until sanitary sewer service is available. It is strongly advised that no new single unit
construction occur on metes-and-bounds parcels using HSDSs be permitted. If such were
allowed it may circumvent efforts to provide area-wide sanitary service.
EXHIBIT B
Sample Request for Comment Letter

April 10, 2017
TAG:

City of Twinsburg

RE: County of Summit D.S.S.S.
Aurora Shores WWTP #29 Abandonment
Project No. Q-178
Village of Reminderville

Mr. ,

The County of Summit Department of Sanitary Sewer Services (D.S.S.S.) provides sanitary sewer service to the Village of Reminderville and portions of Twinsburg Township through the Aurora Shores WWTP #29, the Pond Brook FPA. To provide additional treatment capacity for the Village of Reminderville and Twinsburg Township, and consolidate the treatment processes D.S.S.S. and the City of Twinsburg wish to consolidate the Pond Brook Facilities Planning Area with the Twinsburg Facilities Planning Area.

D.S.S.S is requesting that the boundary between the Pond Brook FPA and the Twinsburg FPA be eliminated. The Twinsburg FPA will encompass the entire region. The wastewater prescriptions in the Twinsburg jurisdiction remain unchanged. Current Pond Brook Facilities Plan prescriptions have been revised to conform to the Twinsburg prescriptions as shown in yellow on the attached documents.

Attached for your information is:
- The current Summit County Facilities Planning Areas (Figure 1)
- The current Pond Brook Facilities Planning Area (Figure 2a)
- The current Twinsburg Facilities Planning Area (Figure 2b)
- The proposed Twinsburg Facilities Planning Area (Figure 3)
- The proposed revisions to the Twinsburg Facilities Planning Area prescriptions (modifications are highlighted or shown as strikeouts)
- A response letter for your use

We would appreciate your comments prior to April 28, 2017. Please use the attached form for your comments.

Comments and request for additional information may be directed to Tim Gott, Environmental Engineer, County of Summit Department of Sanitary Sewer Services,
1180 S. Main St., Suite 201, Akron, Ohio 44301. The contact information is 330-926-2501 and tgott@does.summitoh.net

Sincerely,

MICHAEL A. WEANT, DIRECTOR
COUNTY OF SUMMIT DEPT OF SANITARY SEWER SERVICES

TIM A. GOTT, P.E.
Environmental Engineer

TAG/sdc

pc: R. Nicholson
Date: April 10, 2017

To: County of Summit Department of Sanitary Sewer Services
   Suite 201
   1180 S. Main St.
   Akron, OH 44301

From: City of Twinsburg
      Village of Reminderville
      Twinsburg Township
      Twinsburg Water and Sewer District
      Portage County Water Resources
      Summit County Public Health
      City of Aurora

RE: Twinsburg FPA and Pond Brook FPA consolidation
    Q-178 WWTP No. 29 Abandonment
    (Revised March 14, 2017)

Please review the attached letter, maps, and text, and respond to the County of Summit Department of Sanitary Sewer Services by noting the following:

_____ No objection to the proposed revision

_____ Recommend the comments written heron or attached

_____ Recommend the approval be withheld until completion of further review

_________________________________________  _______________
AUTHORIZED SIGNATURE                      DATE

_________________________________________
AGENCY NAME
EXHIBIT C

Legal Notice

PUBLIC NOTICE AND REQUEST FOR COMMENTS
PROPOSED FACILITIES BOUNDARY AMENDMENT OF THE TWINSBURG AND POND BROOK FACILITIES PLANS.

The County of Summit Department of Sanitary Sewer Services (D.S.S.S.) provides sanitary sewer service to the Village of Reminderville and portions of Twinsburg Township through the Aurora Shores WWTP #29, in the Pond Brook Facilities Planning Area (FPA). To provide additional treatment capacity for the Village of Reminderville and Twinsburg Township, and consolidate the treatment processes D.S.S.S. and the City of Twinsburg wish to consolidate the Pond Brook Facilities Planning Area with the Twinsburg Facilities Planning Area.

D.S.S.S is requesting that the FPA boundary be eliminated between the Pond Brook FPA and the Twinsburg FPA. The Twinsburg FPA will encompass the entire region. The prescriptions in the Twinsburg jurisdiction remain unchanged. Current Pond Brook Facilities Plan wastewater prescriptions have been revised to conform to the Twinsburg FPA prescriptions.

We would appreciate your comments prior to April 19, 2017.

Comments and requests for additional information may be directed to Michael A. Weant, Director, County of Summit Department of Sanitary Sewer Services, 1180 S. Main St., Suite 201, Akron, Ohio 44301. The contact information is 330-926-2426 and mweant@does.summitoh.net