MEMORANDUM

TO: NEFCO General Policy Board Members

FROM: Joseph Hadley Jr., Executive Director

DATE: September 12, 2018

SUBJECT: Consideration of an Amendment to the Clean Water Plan for the Windham Facilities Planning Area to include the areas in the Ohio Army National Guard (OHARNG) Facility

What’s being requested:
On behalf of the Village of Windham, the Portage County Water Resources Department (PCWR) requests the following modification to the Windham Facilities Planning Area (FPA): 1) to modify the Windham FPA Boundary to include the area annotated as the Ravenna Arsenal (hatched as purple); 2) to change the name of the area from “Ravenna Arsenal” to “Ohio Army National Guard Facility”; and to change the wastewater prescriptions for the Ohio Army National Guard (OHARNG) from “Areas will be Served by a POTW or by Home Sewage and Semi-Public Sewage Disposal Systems” (green) to “Areas Currently Served with Sanitary Sewers” (yellow), “Areas that are Expected to be Served with Sanitary Sewers within the Next 20 Years” (orange), and “No Prescriptions” (white).

Background (adapted from information provided by Portage County Water Resources (PCWR):
In June 2011, the Village of Windham entered into and an agreement with PCWR to provide 57,500 gallons per day of sewer capacity. PCWR purchased the sewer capacity to provide sanitary sewer service for the OHARNG Facility. A gravity sanitary sewer extension was installed shortly thereafter to a small training area in OHARNG Facility near Paris-Windham Road and Smalley Road and the wastewater pumped back to the Village of Windham Wastewater Treatment Plant for treatment.

In 2015, the OHARNG installed an approximately five (5) mile force main and pump station to provide gravity sewer to an existing guard shack and future facilities at the former main gate on State Route 5 (Figure 1).

OHARNG is now extending the gravity sewer to provide sewer service to administrative buildings and barracks in the vicinity of the former main gate.

Facilities Planning Area (FPA) boundary change:
The Windham Facilities Planning Area boundary is to be extended to include a portion of the OHARNG facility within Windham Township and Paris Township in the Portage County Water Resources wastewater jurisdiction as shown in Figure 2.
Wastewater prescription change:
The wastewater prescriptions for the OHARNG Facility within the Portage County boundary will be changed from “Areas will be Served by a POTW or by Home Sewage and Semi-Public Sewage Disposal Systems” to “Areas Currently Served with Sanitary Sewers”, “Areas that are Expected to be Served with Sanitary Sewers within the Next 20 Years” and “No Prescriptions”, as indicated in amendment Figure 2.

Local governments/agencies affected:
Ohio Army National Guard
Village of Windham
Portage County Board of Commissioners
Windham Township
Paris Township
Portage County Health District
Ohio EPA – NEDO

All of the entities listed above indicated “no objection to the proposed revision”, except for the Ohio EPA-NEDO which indicated "no comment". All responses are attached.

Public notification efforts:
The legal ad was published in the Record Courier on August 15th.

Specific proposed changes to the current FPA Appendix in the Clean Water Plan:
The proposed changes to existing text in the Windham FPA Appendix have been made with strikeouts and additions. These are attached to the last few pages of this memorandum.

Staff recommendation:
Portage County Water Resources has complied with all of NEFCO’s 208 Plan amendment requirements. There have been no objections to the proposed amendment. Staff recommends approval.

Environmental Resources Technical Advisory Committee (ERTAC) Recommendation to the NEFCO General Policy Board:
The ERTAC recommended approval of the amendment.

NEFCO General Policy Board Action:
Approval of Resolution No. FY2019-004.
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 FOR THE WINDHAM FACILITIES PLANNING AREA TO INCLUDE THE AREAS IN THE OHIO ARMY NATIONAL GUARD (OHARNG) FACILITY

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 Portage County Water Resources (PCWR) Department on behalf of the Village of Windham to consider an amendment to NEFCO's Clean Water Plan to extend the Windham Facilities Planning Area (FPA) boundary to include a portion of the Ohio Army National Guard (OHARNG) facility; and

WHEREAS, this amendment would make the following changes to the wastewater prescription for the Portage County portion of the OHARNG facility: "Areas will be Served by a POTW or by Home Sewage and Semi-Public Sewage Disposal Systems" (green) would be shown as "Areas Currently Served with Sanitary Sewers" (orange), "Areas that are Expected to be Served with Sanitary Sewers within the Next 20 Years" (yellow) and "No Prescriptions" (white), as indicated in amendment Figure 2; and

WHEREAS, the Ohio Army National Guard, Village of Windham, Portage County Board of Commissioners, Windham Township, Paris Township, and Portage County Health District have indicated no objection to the proposed amendment, and the Ohio EPA Northeast District Office had no comment on the amendment; and

WHEREAS, a legal advertisement that described the proposed amendment and sought comments on it, yielded no comments or questions; 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 for the Windham Facilities Planning Area to include the areas in the Ohio Army National Guard (OHARNG) Facility. Furthermore, the Board directs staff to incorporate this amendment into NEFCO's Clean Water Plan and to transmit pertinent amendment materials to the Ohio Army National Guard, Village of Windham, Portage County Board of Commissioners, Windham Township, Paris Township, Portage County Health District, and the Ohio EPA-NEDO.

Certified as action taken by the NEFCO General Policy Board at its regular meeting held on September 19, 2018.

[Signature]
Thomas A. Tatum, Secretary
NEFCO General Policy Board
Figure 1
Windham Facilities Planning Area
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
Areas without a Wastewater Treatment Planning Prescription
Lakes and Ponds
Parks and Natural Areas
Ravenna Arsenal
FPA Boundary
Stream
Community Boundary
Highway
Road
Publicly Owned Wastewater Treatment Works (POTW)

* 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.

Northeast Ohio Four County Regional Planning and Development Organization, December 21, 2011
Figure 2
Windham Facilities Planning Area
208 Clean Water Plan Amendment
Proposed FPA Boundary and Wastewater Prescriptions

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
Areas without a Wastewater Treatment Planning Prescription
Parks and Natural Areas
Ohio Army National Guard (OHANG)
Lakes and Ponds

FPA Boundary
Ohio Army National Guard Facility
Extension of Windham FPA
Basin Divide
Stream
Community Boundary
Numbered Route
Other Major Roads
Publicly Owned Wastewater Treatment Works (POTW)

* 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.

Northeast Ohio Four County Regional Planning and Development Organization, Dec. 21, 2011, modified Aug., 2018
Sources: Portage County Water Resources; Portage County GIS; Ohio EPA; National Hydrologic Database; NEFCO
Gene Roberts, P.E. Director
Water Resources Department

August 14, 2018

Rich Blasick
Surface Water Environmental Manager
Ohio EPA NEDO
2110 E. Aurora Road
Twinsburg, OH 44087

Re: Windham Facilities Planning Area and Wastewater Prescriptions Change

Dear Mr. Blasick,

The Portage County Water Resources Department (PCWR), on behalf of the Village of Windham and the Ohio Army National Guard (OHARNG), is requesting an amendment of the Windham Facilities Planning Area (FPA) Boundary and wastewater prescriptions for the OHARNG Camp Ravenna Joint Training Center. The proposed change will include a portion of Camp Ravenna into the Windham FPA and change the wastewater prescriptions currently annotated as “Areas that will be Served by POTW or by On-site Nondischarging Systems to “Areas Currently Served with Sanitary Sewer” or “Areas Programmed for Sewers within the next 20 years” or “No Prescriptions”. All other wastewater prescriptions are to remain unchanged.

Attached for your information and use are:
- The current Windham FPA 208 Plan (Figure 1);
- The proposed revisions to the Windham FPA 208 Plan (Figure 2) – PLEASE NOTE there is one map change not illustrated; the green color within the OHARNG Facility boundary within the Portage County jurisdiction will be changed to white as the text implies. This change will be included after comment period;
- The proposed wastewater prescriptions (modifications are highlighted and/or shown as strikeouts); and
- A response letter for your use.

PCWR would appreciate your comments prior to August 31, 2018 using the attached form. Questions may be directed to me at the Portage County Water Resources Department, 8116 Infirmary Road, Ravenna, Ohio 44266. Contact information is 330.298.2133 by telephone, or by e-mail at trutledge@portageco.com.

Sincerely,

Tia L. Rutledge, P.E.
Planning Division Manager

(4) Enclosures
cc: Gene Roberts, P.E., Director, Portage County Water Resources Department

T:\Planning\NEFCO\208 Plan\FPA Amendments\Camp Ravenna\Camp Ravenna Facility Planning Area.docx
Date:

To: Portage County Water Resource Department
    Attn: Tia Rutledge
    8116 Infirmary Road
    Ravenna, Ohio 44266

From: Village of Windham
      Paris Township
      Windham Township
      Ohio Army National Guard (Camp Ravenna Joint Military Training Center)
      Ohio EPA-NEDO
      Portage County Board of Commissioners
      Portage County Health District

Re: Windham Facilities Planning Area and Wastewater Prescriptions Change

Please review the attached letter, maps, and text, and respond to the Portage County Water Department by noting the following:

- [ ] No objection to the proposed revision.
- [ ] Recommend the comments written hereon or attached.
- [ ] Recommend the approval be withheld until completion of further review.

Authorized Signature ___________________________ Date ___________________________

Agency Name ___________________________
Date:

To:    Portage County Water Resource Department
       Attn: Tia Rutledge
       8116 Infirmary Road
       Ravenna, Ohio 44266

From:   Village of Windham
         Paris Township
         Windham Township
         Ohio Army National Guard (Camp Ravenna Joint Military Training Center)
         Ohio EPA-NEDO
         Portage County Board of Commissioners
         Portage County Health District

Re:    Windham Facilities Planning Area and Wastewater Prescriptions Change

Please review the attached letter, maps, and text, and respond to the Portage County Water Department by noting the following:

☑ No objection to the proposed revision.

☐ Recommend the comments written hereon or attached.

☐ Recommend the approval be withheld until completion of further review.

Authorized Signature  8/24/18

Village of Windham
Agency Name
Windham Facilities Planning Area and Wastewater Prescriptions Change
Response Form

Date:

To: Portage County Water Resource Department
   Attn: Tia Rutledge
   8116 Infirmary Road
   Ravenna, Ohio 44266

From: Village of Windham
      Paris Township
      Windham Township
      Ohio Army National Guard (Camp Ravenna Joint Military Training Center)
      Ohio EPA-NEDO
      Portage County Board of Commissioners
      Portage County Health District

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☐ Recommend the comments written hereon or attached.

☐ Recommend the approval be withheld until completion of further review.

Authorized Signature

Date

Agency Name
Date:

To: Portage County Water Resource Department
    Attn: Tia Rutledge
    8116 Infirmary Road
    Ravenna, Ohio 44266

From: Village of Windham
      Paris Township
      Windham Township
      Ohio Army National Guard (Camp Ravenna Joint Military Training Center)
      Ohio EPA-NEDO
      Portage County Board of Commissioners
      Portage County Health District

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☐ No objection to the proposed revision.

☐ Recommend the comments written hereon or attached.

☐ Recommend the approval be withheld until completion of further review.

Authorized Signature

[Signature]

Date

8/27/18

Agency Name

[Agency Name]
Windham Facilities Planning Area and Wastewater Prescriptions Change
Response Form

Date:

To: Portage County Water Resource Department
   Attn: Tia Rutledge
   8116 Infirmary Road
   Ravenna, Ohio 44266

From: Village of Windham
      Paris Township
      Windham Township
      Ohio Army National Guard (Camp Ravenna Joint Military Training Center)
      Ohio EPA-NEDO
      Portage County Board of Commissioners
      Portage County Health District

Re: Windham Facilities Planning Area and Wastewater Prescriptions Change

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☐ No objection to the proposed revision.

☐ Recommend the comments written hereon or attached.

☐ Recommend the approval be withheld until completion of further review.

William E. Bledsoe
Authorized Signature

Date
28 Aug 2018

Ohio Army National Guard
Agency Name
Date:

To: Portage County Water Resource Department
   Attn: Tia Rutledge
   8116 Infirmary Road
   Ravenna, Ohio 44266

From: Village of Windham
      Paris Township
      Windham Township
      Ohio Army National Guard (Camp Ravenna Joint Military Training Center)
      Ohio EPA-NEDO
      Portage County Board of Commissioners
      Portage County Health District

Re: Windham Facilities Planning Area and Wastewater Prescriptions Change

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☐ No objection to the proposed revision.

☐ Recommend the comments written hereon or attached.

☐ Recommend the approval be withheld until completion of further review.

[Signature]

Authorized Signature

8/14/18

Date

Agency Name
Windham Facilities Planning Area and Wastewater Prescriptions Change
Response Form

Date:

To: Portage County Water Resource Department
   Attn: Tia Rutledge
   8116 Infirmary Road
   Ravenna, Ohio 44266

From: Village of Windham
      Paris Township
      Windham Township
      Ohio Army National Guard (Camp Ravenna Joint Military Training Center)
      Ohio EPA-NEDO
      Portage County Board of Commissioners
      Portage County Health District

Re: Windham Facilities Planning Area and Wastewater Prescriptions Change

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☒ No objection to the proposed revision.

☐ Recommend the comments written hereon or attached.

☐ Recommend the approval be withheld until completion of further review.

[Signature]
Authorized Signature

[Date] 8/14/18

Portage County Board of Commissioners
Agency Name
Date: 

To: Portage County Water Resource Department  
   Attn: Tia Rutledge  
   8116 Infirmary Road  
   Ravenna, Ohio 44266

From: Village of Windham  
      Paris Township  
      Windham Township  
      Ohio Army National Guard (Camp Ravenna Joint Military Training Center)  
      Ohio EPA-NEDO  
      Portage County Board of Commissioners  
      Portage County Health District

Re: Windham Facilities Planning Area and Wastewater Prescriptions Change

Please review the attached letter, maps, and text, and respond to the Portage County Water Department by noting the following:

☑ No objection to the proposed revision.

☐ Recommend the comments written hereon or attached.

☐ Recommend the approval be withheld until completion of further review.

Authorized Signature: [Signature] 
Date: 6/15/2018

Agency Name: Portage County Health District
PUBLIC NOTICE AND REQUEST FOR COMMENTS PERTAINING TO A PROPOSED FACILITIES PLANNING AREA AMENDMENT IN WINDHAM TOWNSHIP AND PARIS TOWNSHIP, PORTAGE COUNTY, OHIO; WITHIN THE OHIO ARMY NATIONAL GUARD FACILITY

The Portage County Water Resources Department (PCWR) is requesting an amendment to the Windham Facilities Planning Area (FPA) Boundary change and wastewater prescriptions for the area within the Ohio Army National Guard (OHARNG) Camp Ravenna Joint Military Training Center. The wastewater prescriptions for the OHARNG Facility shall as be indicated for white areas (No Prescriptions), yellow areas (Areas Currently Served with Sanitary Sewers), orange areas (Areas Programmed for Sewers within the next 20 years) under the jurisdiction of the PCWR in the proposed 208 plan for the Windham FPA. PCWR would appreciate your comments prior to August 31, 2018.

Comments and requests for additional information may be directed to Tia L. Rutledge, Planning Division Manager, Portage County Water Resources Department, 8116 Infirmary Road, Ravenna, Ohio 44266. Contact information is 330-298-2133 by telephone and trutledge@portageco.com by email.

R.C., August 15, 2018, 12478137
Appendix 3-11

Windham Facilities Planning Area
Windham Facilities Planning Area

I. **Existing Situation**
   A. **County/Basin:**
      Portage / Ohio River Basin
   
   B. **Facilities Planning Area:**
      Windham
   
   C. **Designated Management Agency:**
      I. Primary DMA
         a) Village of Windham
         b) Portage County Water Resources Department (Portage County Regional Sewer District)
      
      II. Secondary DMAs
         a) Portage County Water Resources Department (Portage County Regional Sewer District)
   
   D. **Publicly-Owned Treatment Works:**
      Village of Windham, 0.600 MGD
   
   E. **Facilities Plan:**
      (In progress)
   
   F. **Area Served:**
      Village of Windham, parts of Windham Township, and parts of Ohio Army National Guard Facility in Windham Township and Paris Township
   
   G. **Receiving Stream:**
      South Fork of Eagle Creek, tributary to the Mahoning River
   
   H. **Contact Person/Address/Phone/Fax:**
      a. Mr. Larry Shackleford, Wastewater Treatment Plant Superintendent
         Village of Windham
         9621 East Center Street
         Windham, Ohio 44288
         Phone: (330) 326-2622
      
      b. **Mr. Jeff Lonzrick, Interim Portage County Water Resources Director/Sanitary Engineer**
         Portage County Water Resources Department
         Portage County Administration Building
         449 South Meridian Street
         8116 Infirmary Road
         P.O. Box 1217
         Ravenna, Ohio 44266-0812
         Phone: (330) 297-3670

Approved by Draft to the NEFCO General Policy Board
3-11-3  12/21/2014  8/10/18
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.

II. **Wastewater Treatment Planning Prescription and Wastewater Planning Options**
Original source information provided by the Portage County Water Resources Department (Portage County Regional Sewer District), June 30, 2000, and Village of Garretsville, May 8, 2002.

**Areas without wastewater treatment prescriptions (white):**
These areas currently lack wastewater treatment prescriptions. Future wastewater treatment options will be determined by documented impacts to water resources and “best science” which is defined as the regulatory standards as set by current State and Federal regulations.

**Portage County Water Resources Department (Portage County Regional Sewer District) Jurisdictions**

**Areas Currently Sewered (yellow):**
*Freedom, Windham, Hiram, and Nelson Townships* - 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. All new development and construction in the yellow areas of this facilities planning area will be required to connect to and/or provide sanitary service to ensure that wastewater will be treated at an existing publicly-owned treatment works (POTW) with modifications or expansions as required to handle the flow. Existing non-residential private treatment systems (semi-public), shall be abandoned and connection made to the existing sanitary sewer system if available. Failing HSTSSs serving single family homes shall be abandoned in accordance with Ohio Administrative Code 3701-29-02.

**Areas That Will be Served by a POTW or by On-site Non-discharging Systems (green):**
*Freedom, Windham, Hiram, and Nelson Townships* - Future development will be served by an existing POTW modified or expanded as required to handle the flow or a non-discharging sewage disposal system. Non-discharging systems including on-site septic
systems and systems in which the effluent is applied to the land are locally permitted at this time. New discharging systems are only permitted for repair of existing systems in cases where both central sewer and non-discharging systems are not available.

**Areas Currently Programmed To Be Sewered (orange):**
*Freedom, Windham, Hiram, and Nelson Townships* - These areas are proposed to be served with sanitary sewers. However, there may be undeveloped tracts of land and vacant lots subject to improvement. All new development and construction in the yellow areas of this facilities planning area will be required to connect to and/or provide sanitary service to ensure that wastewater will be treated at an existing publicly-owned treatment works (POTW) with modifications or expansions as required to handle the flow. Existing non-residential private treatment systems (semi-public), which cease to operate properly, shall be abandoned and connection made to the existing sanitary sewer system. Failing HSTSs serving single family homes shall be abandoned in accordance with Ohio Administrative Code 3701-29-02.

**Ohio Army National Guard Easements to Portage County Water Resources Department for Operational Jurisdictions**

**Ohio Army National Guard (purple line interior purple cross hatch):**
This area is currently not served with sanitary sewers. The future of this area will be determined as future land use is identified.

**Ohio Army National Guard Extension of Windham Facilities Planning Area (purple/red dashed line interior purple cross hatch):**
A portion of this area is currently not served with sanitary sewers and is defined as areas where the connection of facilities to sanitary sewer contained therein may occur for which future easements will be granted to Portage County Water Resources for operational jurisdiction. The future of this area will be determined as future land use is identified.

Portage County Water Resources has operational jurisdiction where sanitary sewers exist within easements granted to Portage County Board of Commissioners.