**February 4, 2026**

**Limited Environmental Review and Finding of No Significant Impact**

**City of Elyria – Lorain County**
**WWPCP Activated Sludge Aeration Tank Improvements**
**Loan number: CS390337-0040**

The attached Limited Environmental Review (LER) is for a wastewater treatment improvements project in Elyria which the Ohio Environmental Protection Agency (Ohio EPA) intends to finance through its Water Pollution Control Loan Fund (WPCLF) below-market interest rate revolving loan program. The LER describes the project, costs, and expected environmental benefits. Making available this LER fulfills the 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. In accordance with Ohio Administrative Code 3745-150-05, this project meets the criteria for an LER rather than the more comprehensive Environmental Assessment. More information can be obtained by contacting the person named at the end of the attached LER.

Upon issuance of this Final 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

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**LIMITED ENVIRONMENTAL REVIEW**

## Project Identification

Project: WWPCP Activated Sludge Aeration Tank Improvements

Applicant: City of Elyria
131 Court Street
Elyria, Ohio 44035

Loan Number: CS390337-0040

## Project Summary

The City of Elyria, located in Lorain County (see Figure 1), has applied to the Ohio Water Pollution Control Loan Fund (WPCLF) for $12,154,140 for the Wastewater Pollution Control Plant (WWPCP) Activated Sludge Aeration Tank Improvements project. Elyria is required by federal consent decree to eliminate wet-weather overflows. This project will address improvements to the aeration tanks and increase storage of wet-weather flows for treatment. All improvements will be made at the WWPCP property yard or within existing tanks and structures. The project is eligible for $4 million in principal forgiveness, which will not need to be repaid.

## History & Existing Conditions

Elyria is located in Lorain County (see Figure 1) with a population of 52,833. Elyria owns and operates a WWPCP and maintains 170 miles of sanitary and combined sewers to serve approximately 21,000 residences and 400 industrial and commercial properties. Elyria's WWPCP is currently designed to treat 13 million gallons per day (MGD) of wastewater during dry weather and has a maximum operating capacity of 32 MGD and storage capacity for wet-weather events. The WWPCP discharges treated wastewater to the Black River (see Figure 2).

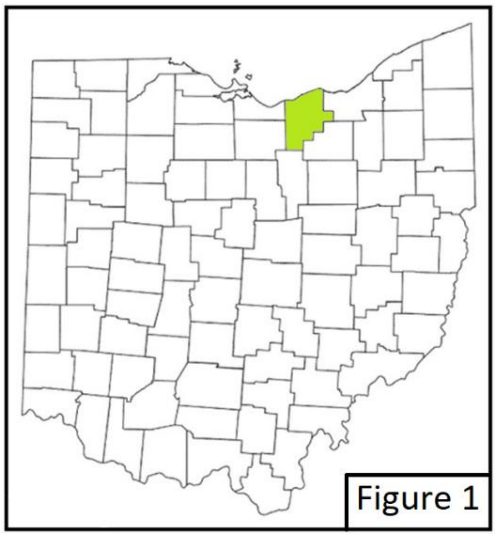
Figure 1

The Elyria WWPCP currently has a peak wet-weather capacity of 32 MGD. During wet weather, flows in excess of 32 MGD are stored in the Wet Weather Storage Tank (WWST). When the capacity of the WWST is exceeded, partially treated wastewater is discharged to the Black River under terms of the facility's National Pollutant Discharge Elimination System (NPDES) permit. When the wet-weather flows to the plant subside, this stored volume is returned to the WWPCP for treatment.

Elyria was issued a federal consent decree which became effective on January 10, 2023, requiring the Elyria WWPCP to increase its treatment capacity from 30 MGD to 40 MGD by December 31, 2026. To achieve this goal, the consent decree has a collection of control measures called the Integrated Wet Weather Control Plan.

Elyria is currently working on relief sewer improvements to capture and store more combined wet-weather flows, which will convey significantly more flows to the WWPCP. This relief sewer will capture combined sewer overflows (CSOs) at various locations in the wastewater collection system and route them to the WWPCP for treatment or temporary storage. These CSOs currently discharge to the Black River without treatment.

The increased flows resulting from construction of the East Side Relief Sewer will increase the flows to the WWPCP and potentially to the river during large wet-weather events. The consent decree wet-weather plan includes a requirement to increase the peak capacity at the WWPCP to 40 MGD to accommodate the increased flows.

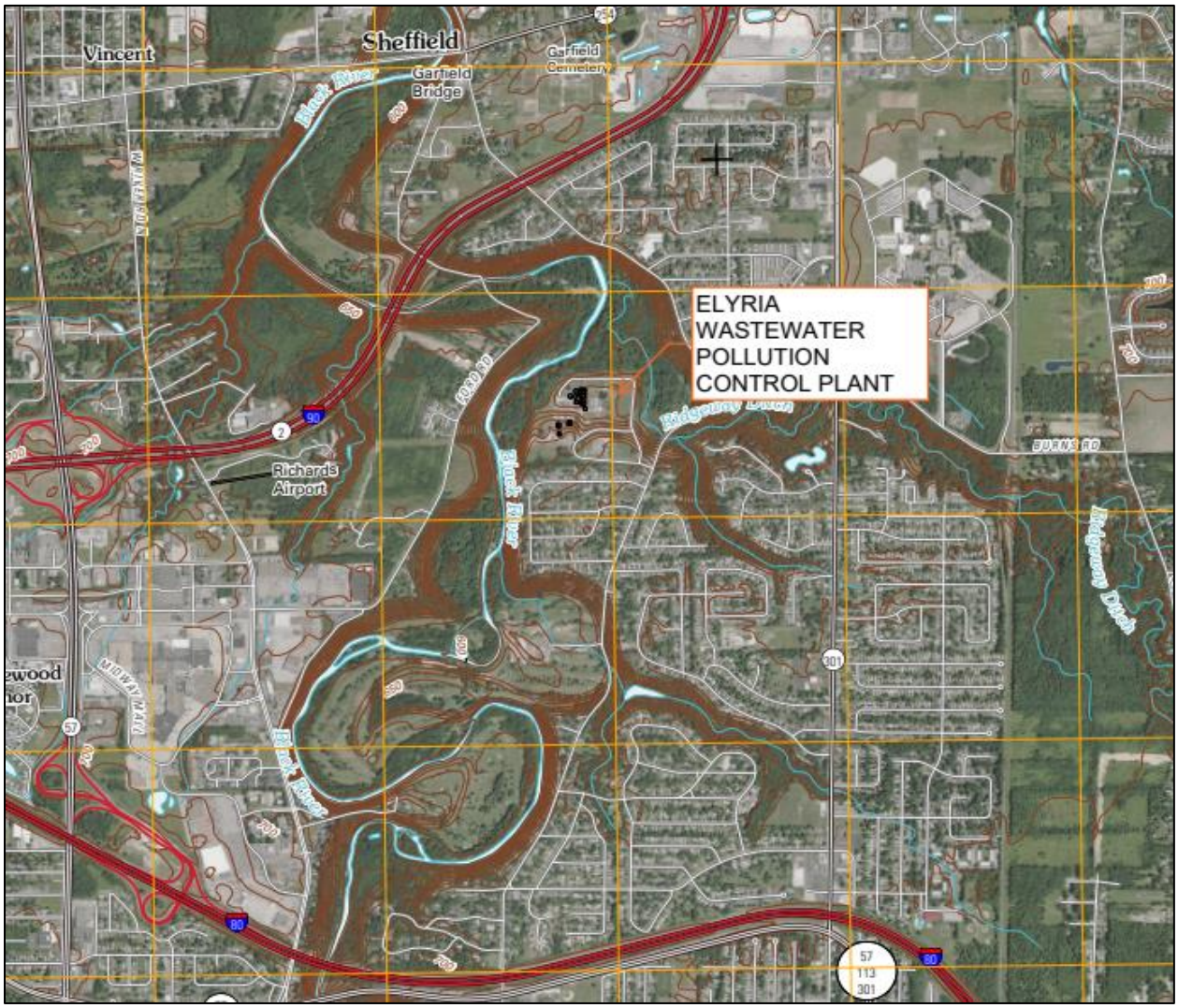


**Figure 2. Map of project location in Elyria.**

## Project Description

To address a consent decree requirement, the Elyria WWPCP treatment capacity will be increased from 30 MGD to 40 MGD.

The treatment capacity increase will be achieved by wet-weather holding tank improvements. The wet-weather holding tanks will have 1,052 linear feet of 36-inch gravity sewer constructed, connecting the east detritus tank effluent channel to the two existing wet-weather holding tanks. An overflow tank on the east detritus effluent channel will be constructed with a flow modulating gate to divert excess flow through the 36-inch fiberglass reinforced pipe to the wet-weather holding tanks. This will achieve the additional capacity of 14.4 MGD. See Figure 3 below for a map of the WWPCP.

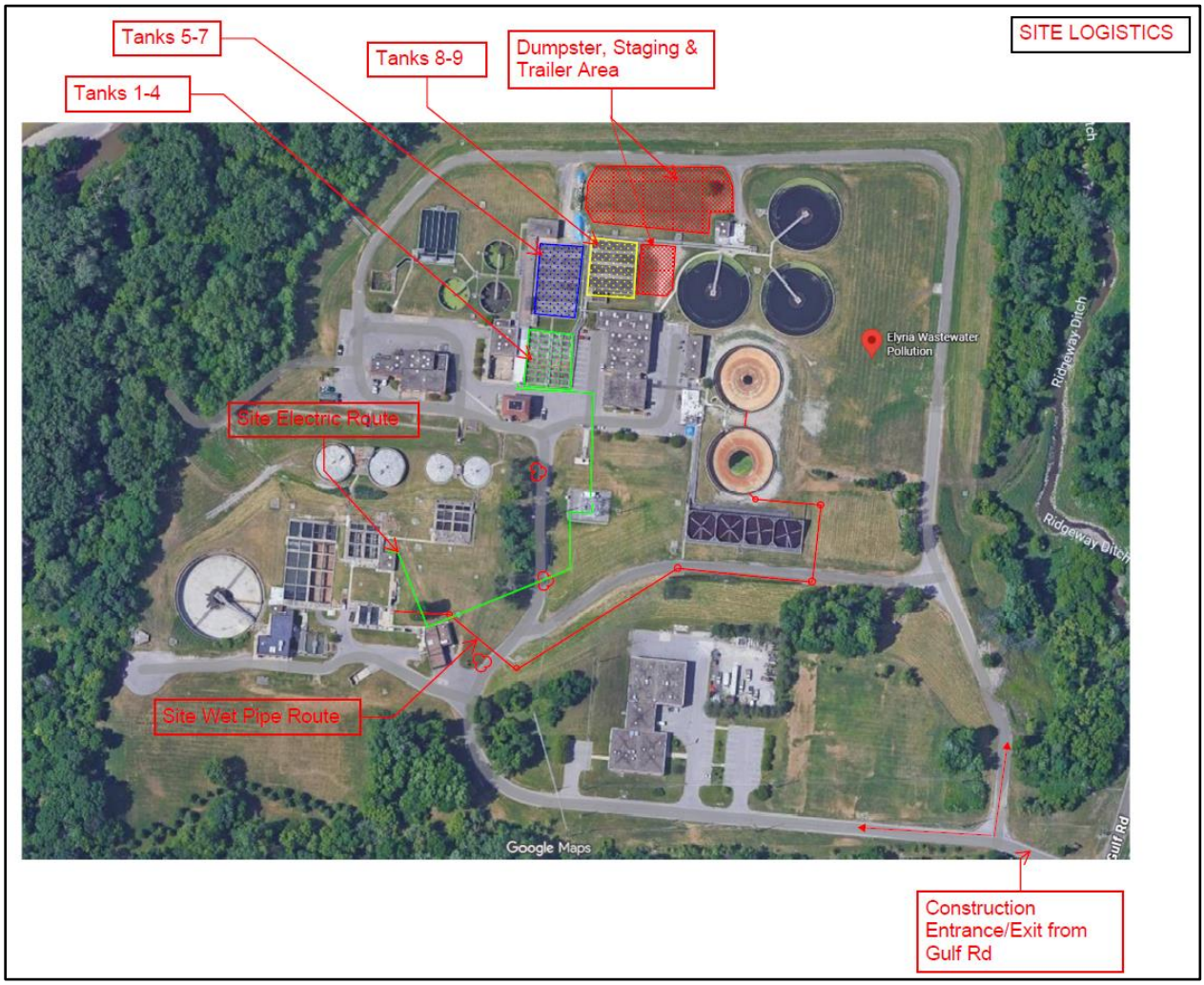


**Figure 3. Map of project improvements within WWPCP site.**

The aeration tank will undergo multiple improvements. The current 2-pass aeration tanks will be converted to a 3-stage biological nutrient removal treatment train by using the existing aeration tank dimensions and creating connections in between the existing aeration tank walls. The tank will receive new concrete walls constructed to create the 3-pass treatment trains. An internal mixed liquor

recycler will be added, connecting the aerobic zone (pass 3) to the anoxic zone (pass 1) for denitrification. The remaining aeration tank will be converted to an anaerobic tank with a new junction chamber that will condition all flows before feeding into the new aeration tank treatment trains. Two submersible mixers will be installed in the anaerobic tank and in each of the anoxic passes.

**Implementation**

Elyria has requested $12,154,140 and is eligible for $4 million as principal forgiveness, which means this amount need not be repaid. The remainer of the loan will be financed at the WPCLF below-market rate, currently at 3.44%. During the 30-year loan period, Elyria will save approximately $6.2 million utilizing WPCLF funding, compared to the current market rate, currently at 4.74%. WPCLF interest rates are set monthly and may change for a later loan award.

A typical residential customer living in Elyria is currently paying $59.75 monthly for sewer service. The most recent sewer rate increase was 3.75% in 2025. The next planned sewer rate increases will be 3.75% annually for the next two years. The estimated median household income (MHI) for a resident of Elyria is $53,204. The average yearly sewer costs will amount to $772 per year by 2027, which is 1.45% of the MHI. By using WPCLF funding, Elyria is minimizing the cost to its customers.

Anticipating loan award in March 2026, construction is estimated to begin shortly thereafter and be completed within 18 months.

**Public Participation**

Elyria has made good efforts over the many years of sewer and treatment facility improvements projects to notify and allow the public to comment. Elyria held monthly public council meetings in July, August, and September 2025, and January 2026 where the project and its funding were discussed.

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

**Conclusion**

The proposed project meets the criteria for an LER; namely, it is an action within an existing public wastewater treatment system, which involves the functional improvements to existing infrastructure. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

**Will have no significant environmental effect, will require no specific impact mitigation, and will have no effect on high-value environmental resources** because project construction will occur within the existing WWPCP property, where the land has been previously disturbed and developed. If

trees will be cut, it will be done seasonally between October 1 and March 30 to avoid impacting the maternity habitat of threatened and endangered bats.

**Is cost effective and is not a controversial action** as Elyria has chosen the best feasible alternative to capture wet weather flows for treatment at the WWPCP. Additionally, Elyria will be utilizing principal forgiveness to minimize financial burden of repayment by its customers.

**Does not create a new, or relocate an existing discharge to surface or ground waters, and will not result in substantial increases in the volume of discharge or the 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** because the discharge limits or volumes will not be increased, no new wastewater will be received, and the treatment capacity will only be increased to accommodate the capture of wet-weather flows. No new service connections will be made, and no additional population will be served.

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 environmental features. 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.

This project will result in the capture and conveyance of wet-weather flows for treatment, to prevent subsequent overflows during wet weather. Elyria will fulfill part of the consent decree obligations to reduce CSOs by the construction of this project.

**Contact Information**

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