



State Revolving Fund Loan Programs

Drinking Water, Clean Water, Nonpoint Source

ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

**CITY OF PERU
WWTP Project
SRF PROJECT WW 22 61 52 06**

DATE: April 16, 2024

TARGET PROJECT APPROVAL DATE: May 17, 2024

I. INTRODUCTION

The above entity has applied to the Clean Water State Revolving Fund (SRF) Loan Program for a loan to finance all or part of the Clean Water project described in the accompanying Environmental Assessment (EA). As part of facilities planning requirements, an environmental review has been completed which addresses the project's impacts on the natural and human environment. This review is summarized in the attached EA, which can also be viewed in color at <http://www.in.gov/ifa/srf/>.

II. PRELIMINARY FINDING OF NO SIGNIFICANT IMPACT (FNSI)

The SRF Clean Water Program has evaluated all pertinent environmental information regarding the proposed project and determined that an Environmental Impact Statement is not necessary. Subject to responses received during the 30-day public comment period, and pursuant to Indiana Code 5-1.2-3, it is our preliminary finding that the construction and operation of the proposed facilities will result in no significant adverse environmental impact. In the absence of significant comments, the attached EA shall serve as the final environmental document.

III. COMMENTS

All interested parties may comment upon the EA/FNSI. Comments must be received at the address below by the target approval date above. Significant comments may prompt a reevaluation of the preliminary FNSI; if appropriate, a new FNSI will be issued for another 30-day public comment period. A final decision to proceed, or not to proceed, with the proposed project shall be effected by finalizing, or not finalizing, the FNSI as appropriate. Comments regarding this document should be sent within 30 days to:

**April Douglas
Environmental Review Coordinator
State Revolving Fund
100 N. Senate Ave. IGCN 1275
Indianapolis, IN 46204
317-234-7294
adouglas@ifa.in.gov**

ENVIRONMENTAL ASSESSMENT

I. PROJECT IDENTIFICATION

Project Name and Address: WWTP Project
City of Peru
35 S Broadway
Peru, IN 46970

SRF Project Number: **WW 22 61 52 06**

Authorized Representative: Mayor Don Sturch

II. PROJECT LOCATION

The proposed project is located in Miami County, Washington township, Peru and Bunker Hill USGS Quadrangles, township 99, range 99 and section No. 7 F. Godfroy, and No. 5 John B. Richardville. See **Figure 1**.

III. PROJECT NEED AND PURPOSE

The proposed project will address aging wastewater treatment infrastructure and allow for treatment of peak wet weather flows in compliance with Peru Utilities' Long-Term Control Plan.

IV. PROJECT DESCRIPTION

The Peru Utilities WWTP Project includes:

- Southside Pump Station improvements, including replacement of raw sewage pumps and chain hoist, addition of exterior stairwell, and ventilation improvements to meet NFPA 820 standards.
- WWTP flow metering improvements.
- Influent screening improvements, including piping modifications to improvement hydraulics, rebuild of the existing mechanical screens, addition of a third mechanical screen, and replacement of the existing screenings conveyance and handling equipment.
- Grit removal improvements, including replacement of the existing grit pumps and grit classification system.
- Pretreatment Building improvements, including gate and valve replacements, miscellaneous lighting- and process control-related electrical upgrades, and HVAC and electrical upgrades to meet NFPA 820 standards.
- Secondary Treatment improvements, including replacement of VLR disc, blower, and mixer equipment, and process gates and valves.
- Secondary Clarification improvements including repair of existing clarifier equipment and construction of a fourth circular clarifier.
- Sludge Withdrawal Pump Station improvements, including addition of a new RAS pump, replacement of pump VFDs, miscellaneous electrical improvements, and HVAC upgrades to meet NFPA 820 standards.

- Disinfection system improvements, including structural modifications, installation of new UV equipment, miscellaneous gates and sensors, non-potable water equipment, and HVAC equipment.
- Mixed Liquor Separation Building improvements, including replacement of RAS and Sludge Transfer pumps, replacement of Sludge Holding blowers, replacement of equipment in RAS Tank Nos. 1-3, miscellaneous structural and electrical/controls improvements, and HVAC and electrical upgrades to meet NFPA 820 standards.
- Process and controls improvements to meet effluent phosphorus limits, including backup CPR system.
- Construction of additional space for equipment and material storage and maintenance for the wastewater utility.
- Miscellaneous structure and site improvements at the WWTP, including site lighting and fencing.
- SCADA system upgrades, including HMI, network, communication, and PLC improvements.
- Demolition of the Old Control Building, rectangular Settling Tanks (2), rectangular Primary Clarifiers (2), rectangular Secondary Clarifiers (5), and original Pretreatment Structure.
- Purchase of a skid steer/telehandler for use at the WWTP.

V. ESTIMATED PROJECT COSTS, AFFORDABILITY AND FUNDING

A. Selected Plan Estimated Cost Summary

Total Construction	\$30,891,000
Non-Construction Costs	\$ 4,200,000
Total Estimated Project Cost	\$35,091,000

- B. Total cost of this project is estimated to be approximately \$35,091,000. Peru will finance the project with a loan from the Clean Water SRF Loan Program for a term and annual fixed interest rate to be determined at loan closing. Monthly user rates and charges may need to be analyzed to determine if adjustments are required for loan repayment.

VI. DESCRIPTION OF EVALUATED ALTERNATIVES

The “**No Action**” alternative is not practical, environmentally sound or economical. It does not address the purpose and need of the project and will not allow the community to meet its LTCP goals and schedule.

WWTP Improvements: This is the selected alternative to address aging wastewater treatment infrastructure and allow for treatment of peak wet weather flows in compliance with Peru Utilities’ Long-Term Control Plan.

VII. ENVIRONMENTAL IMPACTS OF THE FEASIBLE ALTERNATIVES

A. Direct Impacts of Construction and Operation

Disturbed/Undisturbed Land: All areas have been previously disturbed by construction

activity.

Structural Resources: Construction and operation of the project will not alter, demolish or remove historic properties. If any visual or audible impacts to historic properties occur, they will be temporary and will not alter the characteristics that qualify such properties for inclusion in or eligibility for the National Register of Historic Places. The SRF's finding pursuant to Section 106 of the National Historic Preservation Act is: "*no historic properties affected.*"

Surface Waters: The project will not adversely affect outstanding state resource waters listed in 327 IAC 2-1.3-3(d), exceptional use streams listed in 327 IAC 2-1-11(b), Natural, Scenic and Recreational Rivers and Streams listed in 312 IAC 7-(2), or Salmonid Streams listed in (327 IAC 2-1.5-5(a)(3) or streams on the Outstanding River List for Indiana.

Wetlands: There are no wetlands in the project area.

Floodplain (Figure 2): The front plant driveway is located within the 100-year flood plain, but the remainder of the structures are located out of the floodplain with all structures tops of walls above the base flood elevation. During a 100-year flood, water will back up through the effluent pipe and impact operation of the gravity effluent aeration process. However, the facility is designed such that back up mechanical aeration can be provided during flood events as needed. The Post Aeration and UV Disinfection Building would be negatively impacted by a 500-year flood event and the majority of the facility would be inaccessible. The loan applicant is aware of the hazards of locating structures in areas subject to the base flood. The following mitigations are included in the proposed project: All structures protected against the base flood by 3'-6" with alternative operations for post-aeration during flood conditions. The loan applicant is aware of the hazards of locating structures in areas subject of the base flood. Relocation of the facility is not deemed to be a feasible or reasonable alternative because of low-risk associated with the base flood and the economic burden of relocation. The applicant will ensure that the SRF-funded facilities remain protected to 3.5 feet above the base flood elevation.

Groundwater: The project will not impact a drinking water supply or sole source aquifer.

Plants and Animals: The proposed project items will be implemented to minimize impact to non-endangered species and their habitat. Mitigation measures cited in comment letters from the Department of Natural Resources and the U.S. Fish and Wildlife Service will be implemented.

Prime Farmland: The project will not convert prime farmland.

Air Quality: Construction activities may generate some noise, fumes and dust, but should not significantly affect air quality.

Open Space and Recreational Opportunities: The project will neither create nor destroy open space or recreational opportunities.

Lake Michigan Coastal Program: The project will not affect the Lake Michigan Coastal Zone.

National Natural Landmarks: Construction and operation of the proposed project will not affect National Natural Landmarks.

B. Indirect Impacts

The town's Preliminary Engineering Report (PER) states: *The City of Peru and Peru Utilities, through local zoning laws, the authority of its council or planning commission and board, or*

other means, will ensure that future development and utility projects connecting to SRF-funded facilities will not adversely affect wetlands, wooded areas, steep slopes, archaeological/historical/structural resources, or other sensitive environmental resources. The City of Peru and Peru Utilities will require new development and utility projects to be constructed within the guidelines of the US Fish and Wildlife Service, Indiana Department of Natural Resources, Indiana Department of Environmental Management, and other environmental review authorities.

C. Comments from Environmental Review Authorities

In correspondence dated October 11, 2023, the Indiana Department of Natural Resources Division of Historic Preservation and Archaeology stated:

Pursuant to Indiana Code 5-1.2-10, Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108), and 36 C.F.R. Part 800, the Indiana State Historic Preservation Officer (“Indiana SHPO”) is conducting an analysis of the materials dated and received by the Indiana SHPO on September 13, 2023, for the above indicated project in Peru, Miami County, Indiana.

Based on our analysis, it has been determined that no historic properties will be altered, demolished, or removed by the proposed project.

If any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, state law (Indiana Code 14-21-1-27 and 29) requires that the discovery must be reported to the Department of Natural Resources within two (2) business days. In that event, please call (317) 232-1646. Be advised that adherence to Indiana Code 14-21-1-27 and 29 does not obviate the need to adhere to applicable federal statutes and regulations, including but not limited to 36 C.F.R. 800.

In correspondence dated September 14, 2023, the United States Fish and Wildlife Service stated:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on September 14, 2023, for 'Peru WWTP' (here forward, Project). This project has been assigned Project Code 2023-0129100 and all future correspondence should clearly reference this number. Please carefully review this letter.

Ensuring Accurate Determinations When Using IPaC

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into IPaC must accurately represent the full scope and details of the Project.

Failure to accurately represent or implement the Project as detailed in IPaC or the Northern Long-eared Bat Rangewide Determination Key (Dkey), invalidates this letter. Answers to certain questions in the DKey commit the project proponent to implementation of conservation measures that must be followed for the ESA determination to remain valid.

Determination for the Northern Long-Eared Bat

Based upon your IPaC submission and a standing analysis, your project has reached the determination of “No Effect” on the northern long-eared bat. To make a no effect

determination, the full scope of the proposed project implementation (action) should not have any effects (either positive or negative), to a federally listed species or designated critical habitat. Effects of the action are all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur. Effects of the action may occur later in time and may include consequences occurring outside the immediate area involved in the action. (See § 402.17).

Under Section 7 of the ESA, if a federal action agency makes a no effect determination, no consultation with the Service is required (ESA §7). If a proposed Federal action may affect a listed species or designated critical habitat, formal consultation is required except when the Service concurs, in writing, that a proposed action "is not likely to adversely affect" listed species or designated critical habitat [50 CFR §402.02, 50 CFR§402.13].

Other Species and Critical Habitat that May be Present in the Action Area

The IPaC-assisted determination for the northern long-eared bat does not apply to the following ESA-protected species and/or critical habitat that also may occur in your Action area:

Indiana Bat Myotis sodalis Endangered

Monarch Butterfly Danaus plexippus Candidate

Tricolored Bat Perimyotis subflavus Proposed Endangered

Whooping Crane Grus americana Experimental Population, Non-Essential

You may coordinate with our Office to determine whether the Action may affect the animal species listed above and, if so, how they may be affected.

Next Steps

Based upon your IPaC submission, your project has reached the determination of "No Effect" on the northern long-eared bat. If there are no updates on listed species, no further consultation/coordination for this project is required with respect to the northern long-eared bat. However, the Service recommends that project proponents re-evaluate the Project in IPaC if: 1) the scope, timing, duration, or location of the Project changes (includes any project changes or amendments); 2) new information reveals the Project may impact (positively or negatively) federally listed species or designated critical habitat; or 3) a new species is listed, or critical habitat designated. If any of the above conditions occurs, additional coordination with the Service should take place to ensure compliance with the Act.

If you have any questions regarding this letter or need further assistance, please contact the Indiana Ecological Services Field Office and reference Project Code 2023-0129100 associated with this Project.

In correspondence dated October 12, 2023, the Department of Natural Resources Environmental Unit stated:

The Indiana Department of Natural Resources has reviewed the above referenced project per your request. Our agency offers the following comments for your information and in accordance with the National Environmental Policy Act of 1969.

If our agency has regulatory jurisdiction over the project, the recommendations contained in this letter may become requirements of any permit issued. If we do not have permitting authority, all recommendations are voluntary.

Regulatory Assessment:

Formal approval by the Department of Natural Resources under the regulatory programs administered by the Division of Water is not required for this project.

Natural Heritage Database:

*The Natural Heritage Program's data have been checked. The State endangered Rayed Bean (*Villosa fabalis*), Snuffbox (*Epioblasma triquetra*), and Clubshell (*Pleurobema clava*), and the State special concern Black Sandshell (*Ligumia recta*) have been documented within .5 mile of the project area.*

Fish and Wildlife Comments:

Avoid and minimize impacts to fish, wildlife, and botanical resources to the greatest extent possible, and compensate for impacts. The following are recommendations that address potential impacts identified in the proposed project area:

A) Heritage Species

As no in-stream work is required for this project, the Division of Fish and Wildlife does not anticipate any significant effects to the above-listed mussel species.

The additional measures listed below should be implemented to avoid, minimize, or compensate for impacts to fish, wildlife, and botanical resources:

- 1. Revegetate all bare and disturbed areas with a mixture of grasses (excluding all varieties of tall fescue) and legumes as soon as possible upon completion; turf-type grasses (including low-endophyte, friendly endophyte, and endophyte free tall fescue but excluding all other varieties of tall fescue) may be used in regularly mowed areas only.*
- 2. Minimize and contain within the project limits all tree and brush clearing.*
- 3. Appropriately designed measures for controlling erosion and sediment must be implemented to prevent sediment from entering the waterbody or leaving the construction site; maintain these measures until construction is complete and all disturbed areas are stabilized.*
- 4. If erosion control blankets are used, they shall be heavy-duty, biodegradable, and net free or use loose-woven/Leno-woven netting to minimize the entrapment and snaring of small-bodied wildlife such as snakes and turtles (follow manufacturer's recommendations for selection and installation); seed and apply mulch on all other disturbed areas.*

In correspondence dated April 2, 2024, the Natural Resources Conservation Service stated:

The proposed improvements to the Peru WWTP project in Miami County, Indiana, as referred to in your letter received March 29, 2024, will not cause a conversion of prime farmland.

VIII. MITIGATION MEASURES

City of Peru's WWTP PER states:

Erosion control measures will be taken as a part of the construction project.

IX. PUBLIC PARTICIPATION

A properly noticed public hearing was held on April 25, 2023, at 3:30 pm at the Peru Utilities Main Office to discuss the PER. No written comments were received during the 5-day comment period following the hearing.

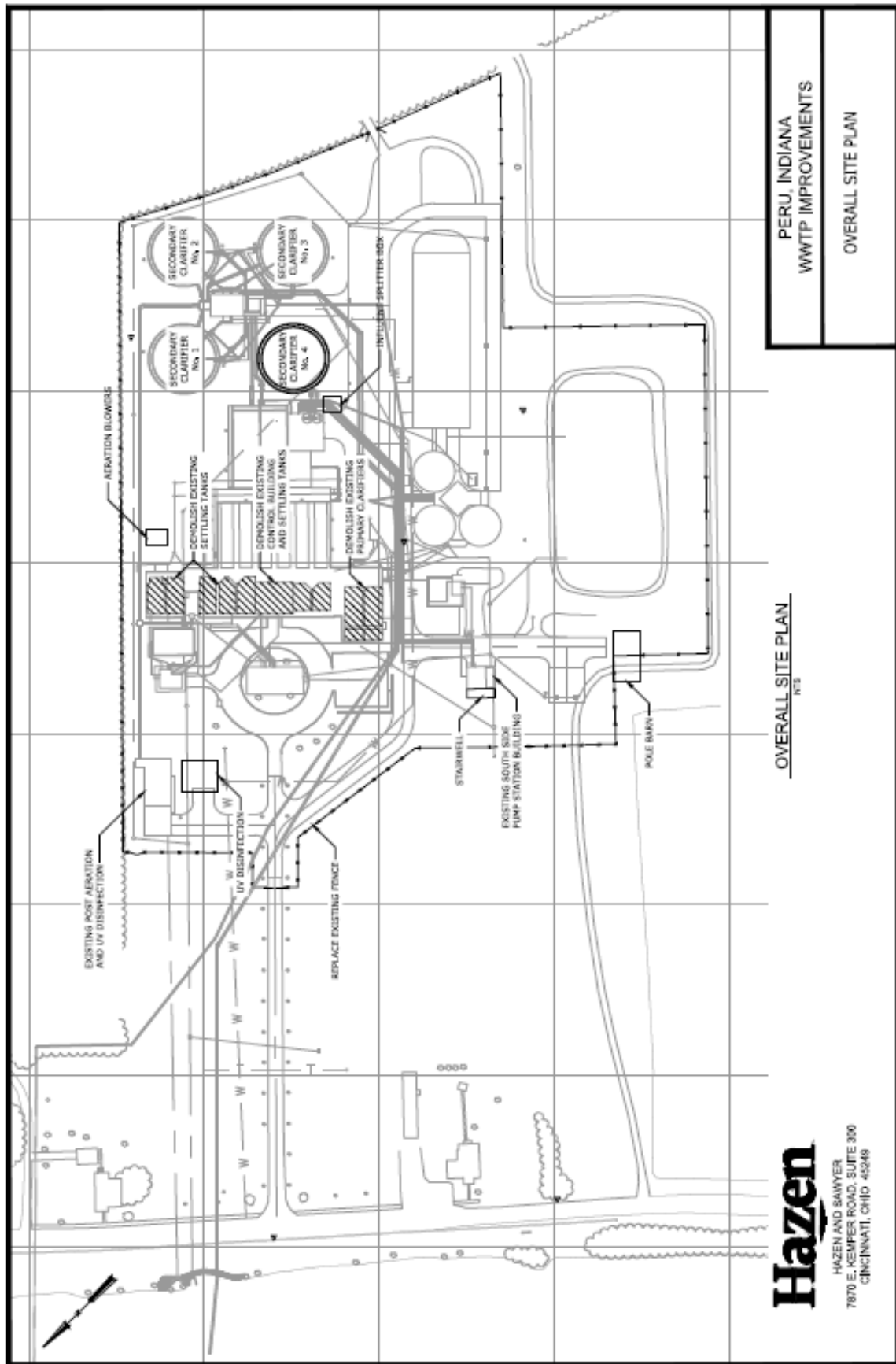


Figure 1 – Overall Site Plan



Figure 2 – Floodplain Map