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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING

DANIEL EICHINGER
ACTING DIRECTOR

April 13, 2023

TO: All Interested Citizens, Organizations, and Government Agencies

SUBJECT: FINDING OF NO SIGNIFICANT IMPACT
Gogebic-Iron Wastewater Authority, Gogebic County
Wastewater Treatment Plant Improvements Project
Clean Water State Revolving Fund Project Number 5796-01

The purpose of this notice is to seek public input and comment on a preliminary decision by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) that an Environmental Impact Statement (EIS) is not required to implement recommendations discussed in the attached Environmental Assessment of a wastewater system project plan submitted by the applicant mentioned above.

HOW WERE ENVIRONMENTAL ISSUES CONSIDERED?

Part 53, Clean Water Assistance, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, being Sections 324.5301 to 324.5316 of the Michigan Compiled Laws Annotated, requires EGLE to evaluate all environmental implications of a proposed wastewater project. EGLE has done this by incorporating a detailed analysis of the environmental effects of the proposed alternatives in its review and approval process. A project plan containing information on environmental impacts was prepared by the municipality and reviewed by the State. EGLE has prepared the attached Environmental Assessment and found that the proposed project does not require the preparation of an EIS.

WHY IS AN EIS NOT REQUIRED?

Our environmental review concluded that no significant environmental impacts would result from the proposed action. Any adverse impacts have either been eliminated by changes in the project plan or will be reduced by the implementation of the mitigative measures discussed in the attached Environmental Assessment.

HOW DO I GET MORE INFORMATION?

A map depicting the location of the proposed project is attached. This information is also available on our website at Michigan.gov/CWSRF under "Related Links." The Environmental Assessment presents additional information on the project, alternatives that were considered, impacts of the proposed action, and the basis for our decision. Further information can be obtained by calling or writing one of the contact people listed below.

HOW DO I SUBMIT COMMENTS?

Any comments supporting or disagreeing with this preliminary decision should be submitted to me at EGLE, Constitution Hall, P.O. Box 30457, Lansing, Michigan 48909-7957. We will not take any action on this project plan for 30 calendar days from the date of this notice in order to receive and consider any comments.

WHAT HAPPENS NEXT?

In the absence of substantive comments during this period, our preliminary decision will become final. The applicant will then be eligible to receive loan assistance from this Agency to construct the proposed project.

Any information you feel should be considered by EGLE should be brought to our attention. If you have any questions, please contact Ms. Angela Yu, the project manager, at 517-599-5487, by email at YuA@michigan.gov, or you may contact me. Your interest in this process and the environment is appreciated.

Sincerely,

Dan Beauchamp

Dan Beauchamp, Section Manager
Water Infrastructure Funding and Financing Section
Finance Division
517-284-5433

Attachment

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
Clean Water State Revolving Fund
Gogebic-Iron Wastewater Authority, Gogebic County
Environmental Assessment
April 2023

PROJECT IDENTIFICATION

Applicant:	Gogebic-Iron Wastewater Authority
Address:	700 W. Cloverland Drive Ironwood, Michigan 49938
Authorized Representative:	Robert Tervonen, Chair
Project Number:	5796-01

PROJECT SUMMARY

The Gogebic-Iron Wastewater Authority (GIWA) Wastewater Treatment Plant (WWTP) is in western Gogebic County in the City of Ironwood. The WWTP is situated along the Montreal River which serves as the border between Michigan and Wisconsin (Figure 1). GIWA accepts wastewater flows from the City of Ironwood, Ironwood Township, and the City of Hurley, Wisconsin. The three communities are members of GIWA, and each have a representative serving on the board. Currently, GIWA serves approximately 9,267 customers in the three municipalities. Based on 2020 U.S. Census data, the populations for the municipalities are as follows: City of Ironwood, 5,045; Ironwood Township, 2,214; Hurley, Wisconsin, 1,558. Future populations are expected to remain stable.

GIWA is applying for a low interest 30-year Clean Water State Revolving Fund (CWSRF) loan administered by the Michigan Department of Environment, Great Lakes, and Energy for improvements to the GIWA WWTP. The proposed project includes WWTP equipment replacement and various improvements. The total estimated project cost is $25,210,000. GIWA qualified for an American Rescue Plan (ARP) grant not to exceed $20,000,000. The remaining $5,210,000 would be financed by a CWSRF loan. Project construction is expected to begin in August 2023 and conclude in winter 2024.

The GIWA project plan estimated up to a $22.09 monthly rate increase for a typical residential customer due to the WWTP improvements project if the project was fully financed through a CWSRF loan. However, the actual user cost impact will likely be half or even lower than the estimate since GIWA qualified for an ARP grant for a significant portion of the project. The user cost impact will be adjusted according to the final CWSRF loan amount received by GIWA.

EXISTING SYSTEM AND PROJECT NEED

GIWA was incorporated in 1983 to own and operate wastewater treatment facilities for the three communities. Prior to GIWA's existence, each member community either operated smaller systems or small neighborhood or private facilities. The GIWA WWTP began operations in 1986 and has undergone minor improvements and upgrades since its completion.

Wastewater is collected through a system of gravity collector and interceptor sewers, with strategically placed lift stations based on local terrain. Each member community owns and

operates its own wastewater collection system. Once wastewater flows to the WWTP, it undergoes pretreatment, which includes screening, raw sewage pumping, and grit removal. The wastewater then goes through primary treatment, where it flows through primary clarifiers, then secondary treatment, where flows enter into an oxidation ditch. It flows into a secondary clarifier and then the flow undergoes chlorine disinfection and is dechlorinated and aerated before it is discharged into the Montreal River. Solids that were removed during the pretreatment process go through anaerobic digestion. After it is digested and dewatered, the sludge is disposed through land application.

In 2014, the WWTP headworks facility was upgraded, and improvements were made to the raw sewage screening and grit removal process. Additionally, a septage receiving station was constructed. No other significant upgrades have been completed. In 2020, GIWA developed a wastewater asset management plan (AMP) and capital improvements plan. The plans were developed after the WWTP was inspected and reviewed. Overall, the WWTP is in good condition, but the majority of the equipment is original and nearing end of useful life.

The GIWA WWTP operates in overall compliance with their National Pollutant Discharge Elimination System (NPDES) permit (permit number MI0020125). However, the WWTP has experienced several fecal limit violations in the past 20 years. Additionally, during peak flows, the raw sewage screw pumps are unable to handle the additional flow. The augers are worn out, which reduces hydraulic efficiency and leads to sanitary sewer overflows (SSOs). Another challenge the WWTP has is wet weather flow from tributary communities versus treatment capacity. Member communities have addressed the problem with sewer replacement and separation either recently or are in the process of doing so. A major system update is needed to avoid structural and process failures, maintain the reliability of the treatment process, improve treatment efficiency, and eliminate fecal violations.

PROPOSED PROJECT

A. Alternatives Considered

No-action Alternative
The no action alternative would result in continuing adverse impacts on the WWTP and its customers. Several systems at the WWTP are nearing or past end of useful life, posing a potential hazard for the public and environment. Additionally, if no improvements are made to the WWTP, this may cause the plant to be non-compliant with its NPDES permit. Therefore, this alternative was not considered further.

Optimum Performance of Existing Facilities
Optimization alone would not address issues related to aging equipment and systems at the WWTP. To ensure optimal plant performance, this alternative was not considered.

Regional Alternative
GIWA is a regional facility and currently serves three communities. The nearest potential new regional contributor could be the City of Bessemer, but Bessemer recently upgraded its WWTP. Additionally, a regional alternative would not address equipment issues at the WWTP. Due to this, this alternative was not considered further.

Improvements to Existing WWTP
This alternative would include various equipment upgrades at the WWTP as recommended by GIWA's AMP. The proposed improvements would increase the remaining life of the WWTP, improve treatment reliability by replacing aging equipment, reduce maintenance costs, decrease energy use, and prevent the occurrence of SSOs.

Proposed projects include improvements to headworks and electrical systems, primary treatment components, oxidation ditch processes, final treatment mechanisms, chemical building components, sludge handling processes, and equipment associated with digester processes. In addition to various WWTP improvements, switching from a chlorine to ultraviolet (UV) disinfection system and upgrading to a class A biosolids treatment process from a class B were also considered.

GIWA considered UV disinfection as an alternative to the chlorination and dechlorination system currently in use at the WWTP. GIWA experiences issues where nitrates interfere with the chlorine disinfection process. Switching to UV disinfection would eliminate this issue. However, the GIWA WWTP does have instances of high inflow and implementing a UV system that can handle large fluctuations in flows would be cost prohibitive.

The WWTP currently produces Class B biosolids, which contain more pathogens and have more restrictive management practices that Class A biosolids. The restrictions associated with Class B biosolids limit when the biosolids can be land applied and causes GIWA to miss the proper timing for land application. While GIWA has space to store the biosolids, this results in a year-long delay and double the amount of time for land application. GIWA compared their current Class B biosolids process method to various Class A biosolids alternatives. If GIWA became a Class A biosolids facility, this would reduce the volume of biosolids and result in less restrictive biosolids management. As such, GIWA considered upgrading equipment to become a Class A biosolids facility.

B. Proposed Project and Estimated Cost

Based on recommendations from the GIWA wastewater AMP, GIWA determined that improvements to the existing WWTP was the best alternative. A variety of project repairs and improvements will be undertaken as part of this alternative (Figure 2). Improvements include upgrades to all stages of the treatment process. Building related upgrades, such as architectural, electrical, and ventilation work, will also be completed as part of this project to protect equipment and bring buildings up to code. The total cost for the WWTP improvements project is estimated at $25,210,000. GIWA is anticipated to receive a $20,000,000 ARP grant for the project and finance the remainder, up to $5,210,000, with a CWSRF loan.

Various improvements will be made to the headworks, which will include sluice gate and influent screw pump replacements. A new sampler unit and grit classifier will be installed, along with general updates to the headworks building. Lastly, to keep the septage receiving station accessible year-round, a roof will be installed to keep the station snow free.

Several primary treatment equipment will be replaced. The clarifier mechanisms and scum mixers will be replaced. A new sampler unit will also be installed. The oxidation ditch will undergo various improvements, including new aerators, mixers, and other instrumentation. Pumps, valving, and piping associated with final treatment will be replaced.

Based on cost, GIWA chose to continue chlorination and upgrade associated equipment. While this would not address disinfection issues, improvements to the oxidation ditch should help address these issues. Equipment associated with the chlorination and dechlorination system would also be upgraded. Improvements are proposed for the chlorine mixer, gas feed equipment, effluent ampler, and various pumps.

Based on reduction in biosolids volume, use of existing equipment, and overall and operating costs, GIWA proposes to produce Class A biosolids using heat drying with dehumidification on

digested sludge. To ensure that the anaerobic digester continues to process biosolids even after GIWA is a Class A facility, various components will be replaced, such as mixing pumps and nozzles, steel covers, piping, pressure release valves, and sludge feed and recirculation pumps.

POTENTIAL PROJECT IMPACTS

A. Water Quality Impacts

The proposed project will include replacement of several processes within the WWTP which are beyond their useful life and will allow GIWA to address fecal limit violations. Additionally, the proposed project will address issues associated with the occurrence of SSOs. This will protect surface and groundwater by preventing overflows and protect human and environmental health by keeping partially treated waste out of the Montreal River.

The WWTP is located on an upland site next to the Montreal River. The proposed project does not have any anticipated impact on the river or other state-regulated water resources, such as inland lakes or streams. There are no existing floodplain areas within the GIWA WWTP site. While isolated wetlands were identified near the WWTP, the proposed project will be completed outside any wetland area and no adverse impacts are expected. The majority of the proposed project will be either completely within the bounds of the existing structures or previously disturbed areas.

B. Construction Impacts

The WWTP improvements will be completed within existing structures and previously disturbed areas within the existing WWTP site. Therefore, the proposed project is not expected to cause cultural, historical, archaeological, or environmental impacts to the surrounding area.

Mitigation measures will be taken to protect areas impacted by construction activities. The impacts of construction activities associated with the project are considered short-term disruptions that, for the most part, will not extend beyond the period of construction. Short-term adverse impacts associated with construction include noise, dust, exhaust fumes, removal of groundcover, and increased erosion potential. Construction contract provisions will outline requirements to comply with the Soil Erosion and Sedimentation Control Act. Mitigation measures will be taken to prevent damage to surrounding areas from soil erosion, dust, and sedimentation.

C. Secondary Impacts

No significant secondary impacts are anticipated as part of this project. The project was designed to address deficiencies at the WWTP. This project will not expand the wastewater service area nor increase the wastewater treatment capacity. Improvements to the WWTP are associated with the need to address occurrence of SSOs, public health threats, and increase the reliability of the system.

PUBLIC PARTICIPATION

An in-person public hearing on the proposed project plan was held on May 12, 2022, at the City of Ironwood City Hall. The public hearing was advertised in *The Daily Globe* newspaper on April 8, 2022. A presentation was given on the proposed project plan, including alternatives considered, potential project impacts, and estimated cost. No comments were submitted prior to the public hearing and all questions from the GIWA Board were answered during the hearing. The GIWA Board passed a resolution in support of the project plan following the hearing.

REASONS FOR CONCLUDING NO SIGNIFICANT IMPACTS

The proposed project will address aging and deficient WWTP equipment and will have no significant adverse direct, indirect, or cumulative impacts on socioeconomic, cultural, or environmental factors. The water quality benefits anticipated from the project area are expected to outweigh the short-term adverse impacts. Additionally, replacing components at the WWTP will provide long-term beneficial impacts.

Questions regarding this Environmental Assessment should be directed to:

Ms. Angela Yu, Project Manager
Water Infrastructure Funding and Financing Section
Finance Division
Michigan Department of Environment, Great Lakes, and Energy
P.O. Box 30457
Lansing, Michigan 48909-4957
Telephone: 517-599-5487
E-Mail: YuA@michigan.gov

Figure 1: GIWA Wastewater Treatment Plant Location

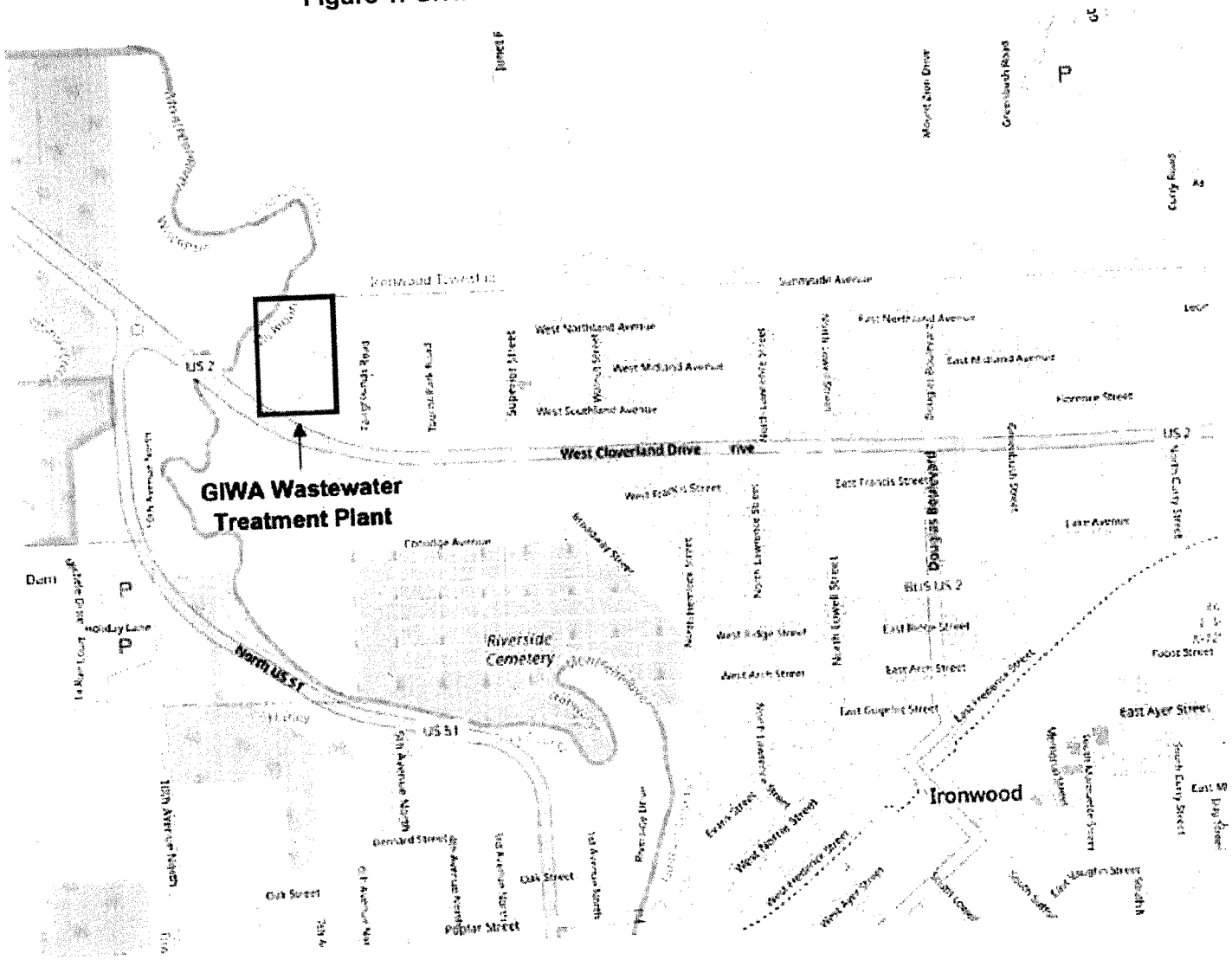

Figure 2: Proposed GIWA Wastewater Treatment Plant Improvements