

January 13, 2026

**Preliminary Finding of No Significant Impact
To All Interested Citizens, Organizations, and Government Agencies**

**Defiance County
Middle Gordon Creek WWTP
Loan Number: CS390020-009**

The attached Environmental Assessment (EA) is for a replacement wastewater treatment plant and added emergency backup generator in Defiance County which the Ohio Environmental Protection Agency intends to finance through its Water Pollution Control Loan Fund (WPCLF) below-market interest rate revolving loan program. The EA describes the project, its costs, and expected environmental benefits. We would appreciate receiving any comments you may have on the project. Making available this EA and seeking your comments fulfills 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. More information can be obtained by contacting the person named at the end of the attached EA.

Any comments on our preliminary determination should be sent to the email address of the contact named at the end of the EA. We will not act on this project for 30 calendar days from the date of this notice. In the absence of substantive comments during this period, our preliminary decision will become final. After that, Defiance County can then proceed with its application for the WPCLF loan.

Sincerely,



Kathleen Courtright, Assistant Chief
Division of Environmental & Financial Assistance

Attachment

ENVIRONMENTAL ASSESSMENT

Project Identification

Project: Middle Gordon Creek WWTP

Applicant: Defiance County
500 Court Street, Suite A
Defiance, Ohio 43512

Loan Number: CS390020-0009



Figure 1. Defiance County

Project Summary

Defiance County (Figure 1) plans to replace the Middle Gordon Creek wastewater treatment plant (WWTP) and has requested \$50,000 in principal forgiveness from the Ohio Water Pollution Control Loan Fund (WPCLF) for an emergency back-up generator at the replacement WWTP. Disturbance will be limited to the footprint of the existing WWTP, which lacks important environmental features.

History & Existing Conditions

Defiance County owns and operates the Hicksville Middle Gordon Creek Wastewater Treatment Plant (Middle Gordon Creek WWTP), a Class A sewage treatment facility with an existing capacity of 8,000 gallons per day (GPD). The treatment process consists of a trash tank, simplex lift station, aeration tank, dosing station, surface sand filters, and a chlorine contact chamber. The process is housed within a metal building. The trash tank, main treatment building, and dosing station are located on a triangular parcel of land owned by Defiance County. The sand filters are located within an easement on an adjacent property. The WWTP discharges to Middle Gordon Creek.

The plant, which was constructed in the 1970s, has exceeded its useful life and problems have begun to arise due to this. The steel tanks have experienced corrosion and degradation, which has caused failures. The plant's capacity is also not equipped to serve potential service area growth anticipated by Defiance County. Due to the age, condition, and potential service area growth, Defiance County plans to replace the existing WWTP.

To safely operate the replacement WWTP during power failures, an emergency backup generator is needed.

Population and Flow Projections

Middle Gordon Creek WWTP is located just outside Hicksville's north corporation limits and serves the Middle Gordon Subdivision which contains 18 lots with 17 residences. Due to expected future residential growth to the north of the existing service area, the 8,000-GPD WWTP will be replaced with a 15,000-GPD WWTP to accommodate the expected increased population and flow.

Alternatives

- *No Action:* The “no-action” alternative is not a feasible option as the existing WWTP has exceeded its useful life and action must be taken to prevent failure.
- *Replace the Middle Gordon Creek WWTP with a pump station and send the flow to Hicksville WWTP:* This alternative will use a pump station and force main to send flow from the Middle Gordon Subdivision to the nearby Hicksville WWTP. This will require additional infrastructure and may require upgrades to Hicksville’s existing gravity sewer and WWTP. Residents of the subdivision will then be billed by Defiance County for the pump station and by Hicksville for the treatment. Engineers estimates indicate the cost to residents would increase by more than \$1,443 per year. These reasons make this alternative not the most cost-effective.
- *Install cloth media tertiary filtration at the existing Middle Gordon Creek WWTP:* This alternative will add a tertiary filtration system to the existing WWTP through cloth media filter discs. The filter discs would be in a steel tank and would remove suspended solids from the wastewater. Backwash from the cloth media filters would be pumped back to the head of the WWTP. This alternative would provide little additional benefit to the environment for the additional high costs and does not resolve the aging components of the WWTP.
- *Replace the Middle Gordon Creek WWTP with a new 15,000-GPD package precast WWTP:* This alternative would replace the current extended aeration activated sludge plant with a new package plant to resolve the issues with outdated equipment and account for future anticipated population growth. This alternative has a smaller land requirement than other alternatives as the land already housing the current WWTP is sufficient in size. Additionally, the county is already familiar with the operation and maintenance. It was determined this alternative was most efficient in cost, constructability, and maintenance.

Selected Alternative

This project will construct a new 15,000-GPD package precast concrete extended aeration WWTP to replace the deteriorating plant and accommodate future residential growth. The proposed WWTP includes the following components: trash trap, aerated flow equalization tank, aerated sludge holding tank, extended aeration/clarification unit, dosing tank, surface sand filters, UV disinfection unit, post aeration chamber with blower, sampling chamber, and diesel fueled 50 kilowatt emergency back-up generator.

The new treatment plant will be constructed west and parallel to the current facility, allowing the existing plant to remain operational during construction. Once the new plant is completed and operational, the old facility will be removed. It may be necessary for the existing building to be removed prior to construction of the new WWTP.

See Figure 2 below for a map of the project area.

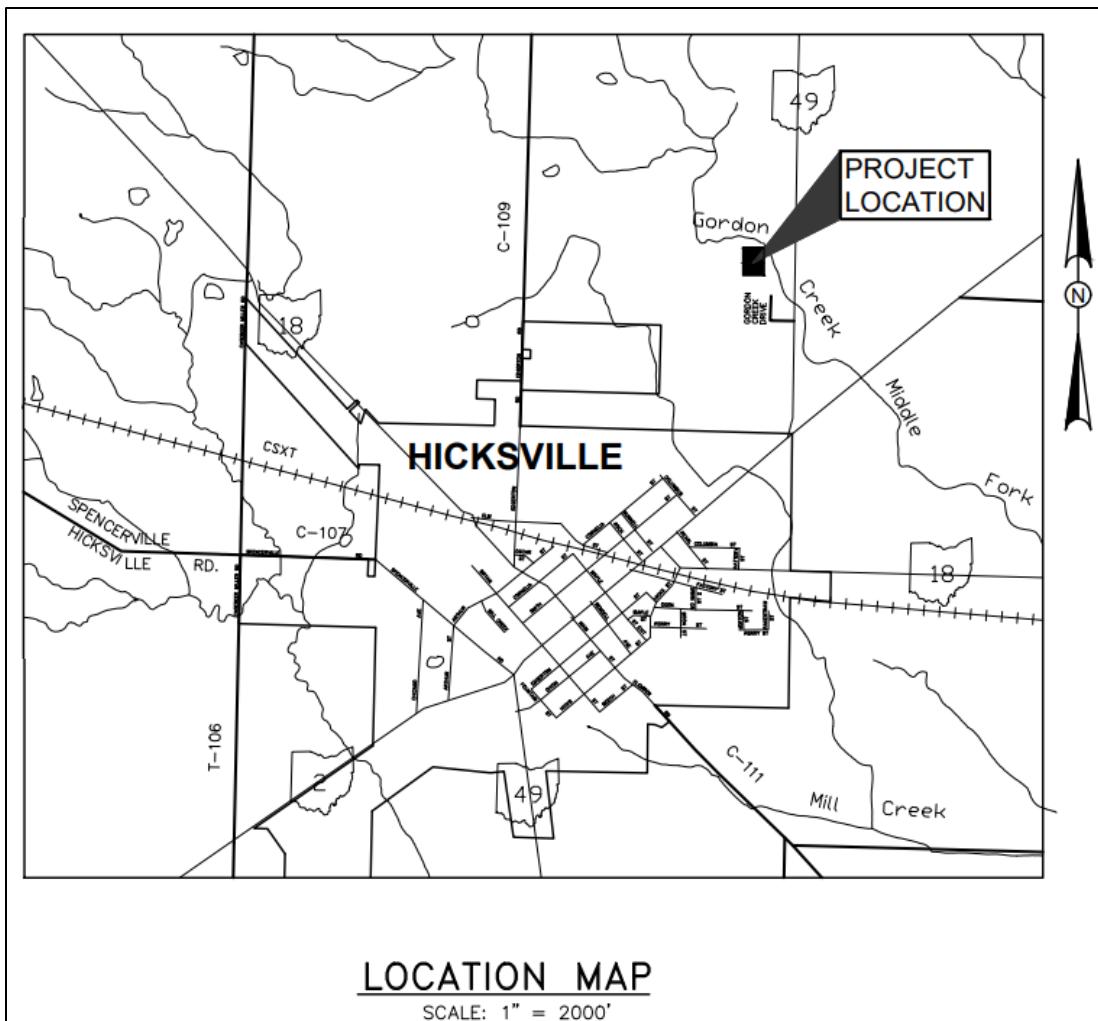


Figure 2. Project area

Implementation

The total cost of the project is approximately \$1.3 million. Defiance County plans to borrow \$50,000 from the WPCLF. Emergency back-up generators are eligible for \$50,000 in principal forgiveness, which is a loan that will not need to be repaid. Defiance County will also utilize \$362,000 from the Ohio Public Works Commission and \$879,000 in local funds for this project.

Construction is expected to begin following loan award and will be completed by August 2026.

Public Participation

Defiance County discusses the project in their board meetings which are open to the public. The project has been in two local newspapers and published on Defiance County's website informing the public of the project, costs, and construction schedule. Defiance County plans to distribute door hangers/letters that include a short description of the project, expected start and end date, possible short-term interruptions, any expected rate increases, and contact information for questions.

Ohio EPA is unaware of any controversy about or opposition to this project. This Environmental Assessment (EA) and preliminary Finding of No Significant Impact (FNSI) will be posted on the Ohio EPA Division of Environmental and Financial Assistance website. Additionally, the EA and FNSI have been provided to Defiance County to be made available according to their public notification procedures.

Environmental Impacts

The project has the potential to affect the following features, but the effects will be reduced or mitigated to acceptable levels as explained below.

Air Quality

This project includes no activities that will impact Defiance County's air quality standards. The contractor will prevent unnecessary dust from construction activities from entering the atmosphere. Because of this approach, there will be no significant adverse short-term or long-term impacts on local air quality.

Archaeological and Historical Resources

The planned area of construction has been previously developed, and all excavation work will take place within or adjacent to the previously disturbed footprint of the existing WWTP. As no new excavations will occur, no impacts are expected to archaeological or historical resources.

However, in the event of archaeological finds during construction, Ohio Revised Code Section 149.53 requires contractors and subcontractors to notify the State Historic Preservation Office (SHPO) of any archaeological discoveries in the project area, and to cooperate with the office in archaeological and historic surveys and salvage efforts when appropriate. Work will not resume until a survey of the find and a determination of its value and effect has been made, and Ohio EPA authorizes work to continue.

Terrestrial Habitat and Endangered Species

Five federally listed species occur in Defiance County: the Indiana bat, the tricolored bat, the copperbelly water snake, the monarch butterfly, and the eastern prairie fringed orchid.

No habitat suited to the copperbelly water snake, monarch butterfly, or eastern prairie fringed orchid is in the project area. The Indiana and tricolored bats have similar summer maternity and roosting habitat preferences (trees with large crevices or loose, sloughing bark higher than ten feet above the ground). Any tree removal in the area will be removed within seasonal clearing dates to avoid impacts to the endangered bats. Based on this information, the project will have no significant adverse short-term or long-term effect on terrestrial habitat or endangered species.

Groundwater Resources

To avoid adverse impacts to groundwater resources, the construction contract includes specifications for appropriate and safe dewatering of deep excavations and management of groundwater. A 50-foot isolation radius will be kept from nearby private wells.

Safety, Noise, Traffic, and Aesthetics

The contractor shall develop a plan prior to commencing construction which shall include all proper lights, signs, and barriers to enforce safety during construction. Traffic will not be impacted as this project takes place on existing county-owned land. As this project is replacing an existing package WWTP, local aesthetics will be unchanged after construction is complete. For these reasons, the project will not adversely affect noise, traffic, public safety, or aesthetics.

Surface Water Resources

The contractor will minimize soil from eroding or otherwise entering into natural watercourses, including nearby Middle Gordon Creek, with the use of stormwater pollution prevention tools such as buffer zones, silt fencing, inlet protection, and seeding.

Local Economy

The current annual sewer bill for residents of the Middle Gordon Creek subdivision is approximately \$1,120. Projected residential sewer bills with the implementation of this project is expected to increase to approximately \$1,188, or 1.7% of median household income (MHI) of Defiance County, which is \$69,302.

By using WPCLF financing for this project, Defiance County has minimized the economic impact on customers. This allows a lower annual sewer bill than otherwise would be possible.

Unaffected Features

Coastal zones, prime farmland, floodplains, wetlands, Wild and Scenic Rivers, sole source aquifers, recreational land use, and energy use will remain unaffected as there are none located within the project area.

Conclusion

Based upon Ohio EPA's review of the planning information and the materials presented in this Environmental Assessment, we have concluded that there will be no significant adverse impacts from the proposed project as it relates to the environmental features discussed previously. 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.

The project will improve long-term reliability, compliance, and wastewater treatment service for customers connected to the Middle Gordon Creek WWTP system.

Contact information

Kristin Parrish
Division of Environmental and Financial Assistance
Ohio Environmental Protection Agency
50 West Town Street, Suite 700
Columbus, Ohio 43215

Email: kristin.parrish@epa.ohio.gov
Phone: 614-644-3662