



December 22, 2025

Limited Environmental Review and Finding of No Significant Impact

**City of Dayton – Montgomery County
36-inch Raw Water Main within Miami Wellfield Phase 3
Loan number: FS390302-0051**

The attached Limited Environmental Review (LER) is for a raw water main extension project in Dayton which the Ohio Environmental Protection Agency (Ohio EPA) intends to finance through its Water Supply Revolving Loan Account (WSRLA) 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,

A handwritten signature in black ink that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Projects: 36-inch Raw Water Main within Miami Wellfield Phase 3

Applicant: City of Dayton
101 West Third Street
Dayton, Ohio 45402

Loan Number: FS390302-0051

Project Summary

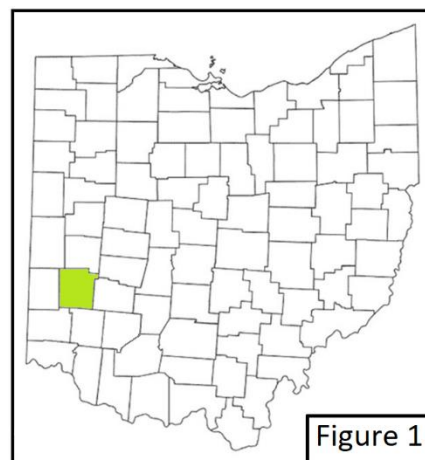
The City of Dayton requested from the Ohio EPA Water Supply Revolving Loan Account (WSRLA) approximately \$3.6 million for the third phase of a raw water main improvements project. The project will construct a raw water main extension to convey increased raw water supply from Dayton's Miami wellfield expansion project in the nearby wellfield. This project is the third of a multi-phase project to construct the new water main. The project is part of a larger initiative the city is implementing to connect the Miami and Ottawa water treatment plants (WTP), and to help implement strategies to protect source waters from emerging contaminants, including Perfluorooctanoic Acid (PFAS) and Perfluorooctyl Sulfonate (PFOS). The project is eligible for half of the loan as principal forgiveness, which will not require repayment.

History & Existing Conditions

Dayton is located in Montgomery County (Figure 1) and owns two water treatment plants (WTPs): Miami WTP and Ottawa WTP. These plants supply water to approximately 400,000 people within Montgomery County, including approximately 137,571 residents within Dayton's city limits.

The distribution system has approximately 753 miles of water mains, with 16 water storage facilities with 88 million gallons in storage capacity. The storage facilities include elevated tanks, underground reservoirs, and a standpipe.

The City of Dayton's distribution system is divided into the north and south, with downtown Dayton serving as the dividing line between north and south. The Miami WTP supplies water to the north side of the distribution system, which is approximately one-third of the demand. The Ottawa WTP supplies water to the south side of the system, which is approximately two-thirds of the demand.



Dayton’s drinking water is supplied by the Mad River and Miami wellfields (see Figure 2), which are in the Great Miami Buried Valley Aquifer. This sand and gravel aquifer holds approximately 1.5 trillion gallons of water and stretches from north of the City of Troy into Logan County and south to the Ohio River through Hamilton County. The Mad River Wellfield supplies water to the Ottawa WTP and the Miami Wellfield supplies water to the Miami WTP. Currently, the water supplies are separate, and the proposed project would construct a new raw water main to connect the Miami North wellfield to the Ottawa WTP.

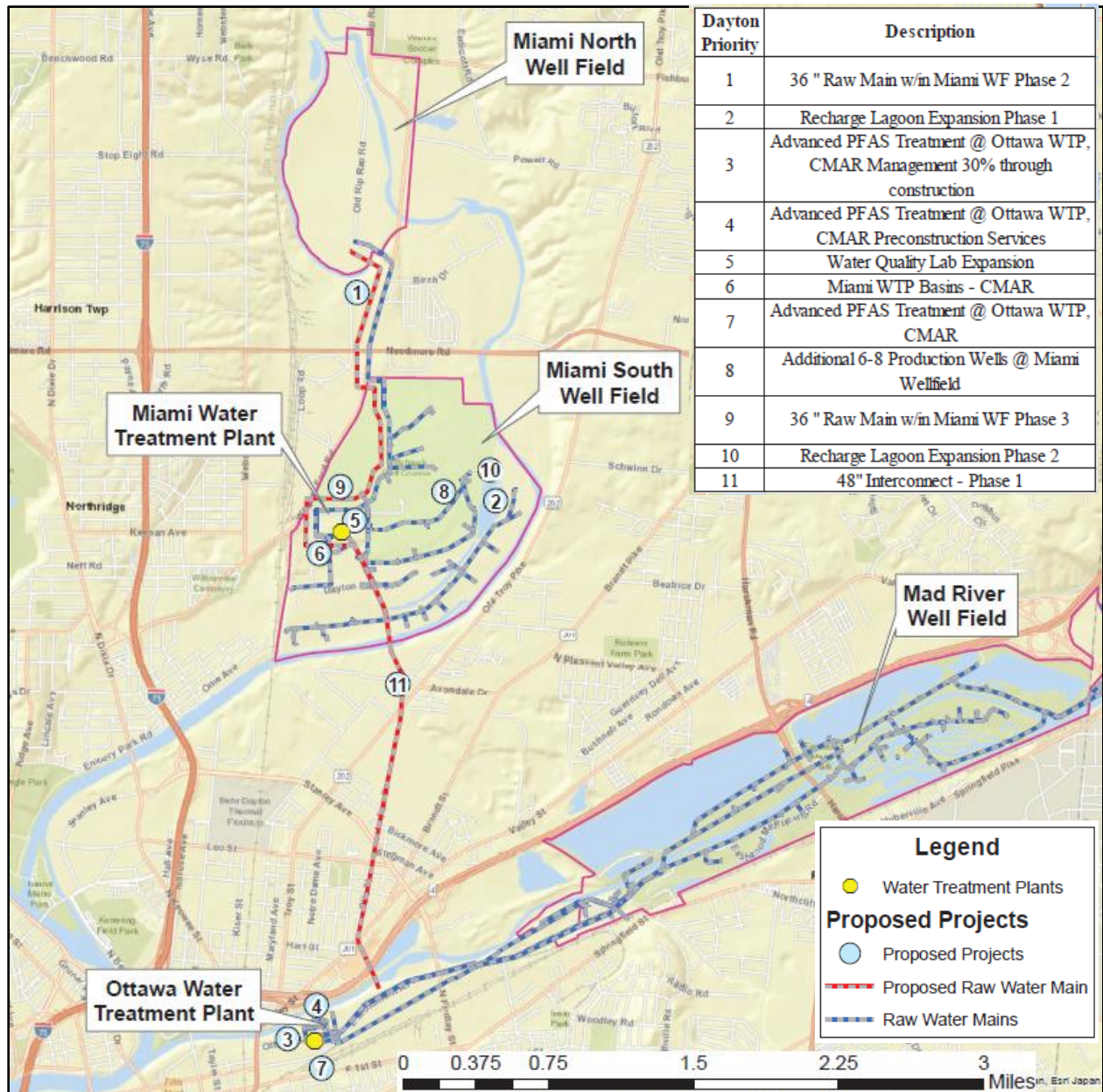


Figure 2. Map of Dayton raw water main project, located at Number 9.

The Miami Wellfield is bordered by Harrison Township and the cities of Huber Heights and Riverside. With an approximate capacity of 72 million gallons daily (MGD), this wellfield was originally

established as an alternative source for Ottawa WTP. In the mid-1960s it began providing water to Miami WTP through a 72-inch force main. It currently has 38 wells and is divided into two sections: Miami North (Rip Rap Road Island) and Miami South.

Miami North is located close to the city of Huber Heights. There are currently three production wells in use at this wellfield. Water from Rip Rap Road is pumped through a 36-inch main to the northeast side of the Miami South Wellfield.

Miami South is located along Wagner Ford Road and Needmore Road. A 72-inch-diameter pipe conveys raw water to the Miami WTP from the southeast side. Another 60-inch-diameter pipeline conveys water to the west side of the Miami WTP from wells on the western section of the wellfield and from Miami North.

Dayton has many known plumes of volatile organic compounds as well as known PFAS/PFOA sources. Dayton has found PFAS/PFOS in some existing wells in all wellfields. Select wells have been taken offline where threat of PFAS/PFOA contamination is high, or has been found in a well. A new well project was recently completed to install four new wells in the Miami Wellfield to increase water supply redundancy. A new pipe is required to carry raw water to the Miami North Wellfield (Rip-Rap Wellfield) to the Miami South Wellfield (Wagner Ford/Needmore Road area) for treatment and conveyance to the Miami WTP.

Project Description

The project will construct approximately 5,200 linear feet of 16-inch to 36-inch raw water main pipe, valves, and appurtenances. Work will be at the Miami North Wellfield, where the raw water main will connect to the existing well piping, and a small segment at the Miami WTP (see Figure 3). Construction will follow existing wellfield access driveways, where other water line is located, as well as developed WTP property.

The first and second phase of this three-phase project is already underway, with this project being the third phase of the necessary raw water main extension. This project is one of many Dayton initiatives to avoid exposure to PFAS in drinking water. The raw water main will provide a raw water supply redundancy by conveying increased raw water from a new wells project in the Miami Wellfield to the Ottawa WTP.

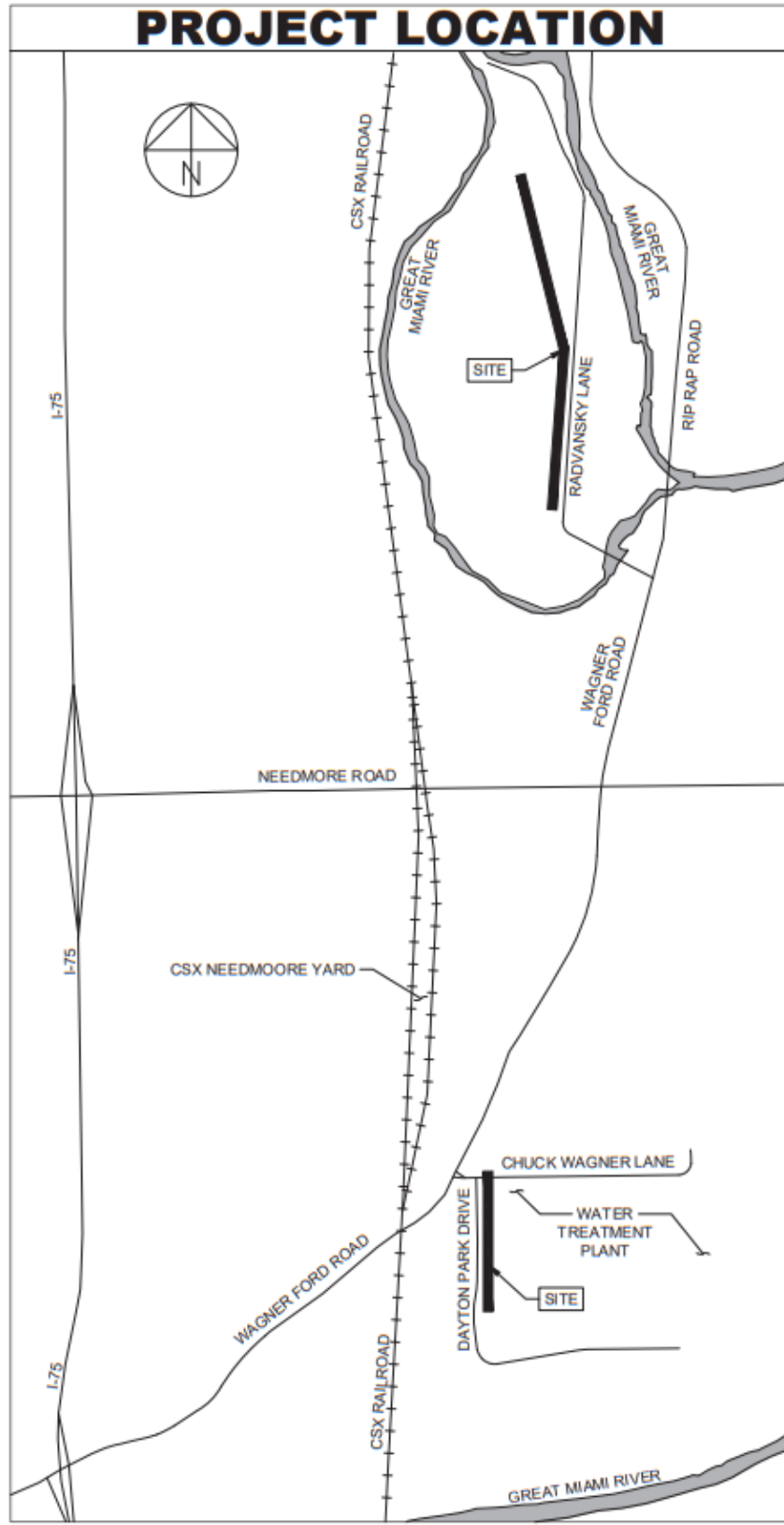


Figure 3. Project map, showing proposed water main in bold.

Implementation

Dayton has requested \$3,642,814 for this project, and is eligible for up to \$4 million in emerging contaminant principal forgiveness, which means this amount need not be repaid. The project will receive 0% emerging contaminant discount interest rate for any remaining balance. During a 20-year loan period, Dayton will save approximately \$5.9 million by using WSRLA financing, compared to the market rate of 4.45%.

A typical residential water customer of Dayton currently pays \$33.12 per month. The most recent water rate was increased 9% in 2025. The Dayton Water Department will begin the process of recommending new rate increases for 2026 to 2028 soon. The estimated median household income (MHI) for a Dayton water customer is \$37,536. The planned average annual water bill will cost \$356 per year by 2025, which is 1.2% of the MHI. This is lower than the average Ohio water bill, \$481.

Anticipating loan award in January 2026, construction of the project will commence shortly after loan award, with completion in 18 months.

Public Participation

Dayton has made good efforts to communicate this project and related water system improvements to the city. Dayton has a section on their website describing PFAS projects and other water system improvements. Many news articles have been published in the local newspaper about this project and other related water system improvements over the past couple years.

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 Dayton to be made available according to their public notification procedures.

Conclusion

The proposed project meets the criteria for a Limited Environmental Review (LER); namely, it is an action within an existing water distribution system, which involves the construction of a new infrastructure. Furthermore, the projects meet the other qualifying criteria for an LER; specifically, the proposed projects:

Will have no significant environmental effect, will require no specific impact mitigation, and have no effect on high-value environmental resources. The raw water line project will occur adjacent to the roadway, under the road, and within the existing wellfield and will not impact valuable natural resources. The project may require a small number of trees to be removed and will be done so during the tree-clearing window from October 1 to March 30, to prevent impacts to threatened and endangered bat species who use trees for habitat and foraging.

Standard construction best management practices will be in place to minimize noise and dust, and traffic disruptions will be temporary with appropriate traffic maintenance measures present. The

project is within the Great Miami Buried Valley Aquifer. Contractors will follow best management practices to prevent spills of petroleum products, and a spill containment kit will be on site to prevent contaminating drinking and groundwater. A stormwater pollution prevention plan will be in place to prevent soil and sediment runoff into storm drains or other waterways, with silt fencing installed around excavations, and inlet protection installed on storm drains where applicable.

Is cost effective, and is not a controversial action. The project has no feasible alternative for necessary improvements to avoid emerging contaminants. Water rates will increase a typical annual amount and Ohio EPA is unaware of controversy or opposition to the projects.

Does not create a new, or relocate an existing discharge to surface or groundwaters, does not create a new source of water withdrawals from either surface or ground waters, or significantly increase the amount of water withdrawn from an existing water source, or substantially increase the volume of discharge or loading of pollutants from an existing source or from new facilities to receiving waters. The project will not affect discharges to surface or groundwaters, or discharge or loadings of pollutants to receiving waters. The raw water main will not impact source water withdrawals.

Will not provide capacity to serve a population substantially greater than the existing population. No new service connections will be made for the project.

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 projects as they relate to environmental features. This is because these features do not exist in the project areas, the features exist but will not be adversely affected, or the impacts will be temporary and mitigated.

The raw water line project will allow Dayton to continue providing safe, reliable drinking water to residents and avoid potentially harmful emerging contaminants.

Contact Information

Megan Osika Gartland
Division of Environmental and Financial Assistance
Ohio Environmental Protection Agency
50 West Town Street, Suite 700
Columbus, Ohio 43215

Email: Megan.gartland@epa.ohio.gov
Phone: (614) 644-3661