JEFFERY W. KITCHENS
DEPUTY DIRECTOR

KAY IVEY
GOVERNOR

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463 Montgomery, Alabama 36130-1463 (334) 271-7700 ■ FAX (334) 271-7950

FINDING OF NO SIGNIFICANT IMPACT

The WW&SB of the Town of Ardmore Limestone County, Alabama

CWSRF Project No. CS010904-02

November 12, 2025

The Alabama Department of Environmental Management (ADEM) has made \$14,339,500 in financial assistance available to the Waterworks and Sewer Board of the Town of Ardmore using funds from the American Rescue Plan Fund (ARPA) and the Clean Water State Revolving Fund (CWSRF) loan program. In accordance with State and Federal regulations that govern the program, the Department has conducted a review to assess potential impacts upon the environment that may result from implementation of this project.

The Waterworks and Sewer Board of the Town of Ardmore proposes a project to renovate and expand the existing wastewater treatment plant to meet current demand. The project consists of upgrades to the influent pumping station, headworks, various basins, aeration and disinfection portions of the plant. The project will increase capacity, reduce I&J, and improve sustainability and reliability throughout the system and allow the system to remain in compliance.

The Department has determined that the project will not have a significant adverse impact on the environment and consequently is herewith issuing a Finding Of No Significant Impact (FONSI) to support the use of CWSRF funds for the construction of the proposed project. However, this decision may be reconsidered if significant adverse information concerning the potential environmental impacts of the project is discovered. Attached is an Environmental Assessment that details the proposed project and its impact upon the environment.

Comments relative to this project should be submitted in writing to Mrs. Juliette Waid, SRF Branch, Permits and Services Division, Alabama Department of Environmental Management, P.O. Box 301463, Montgomery, Alabama 36130-1463, no later than 30 days after the date of this FONSI. The Alabama Department of Environmental Management will not take formal action to proceed with the project without carefully evaluating any public comments opposing the project.

Sincerely,

Edward F. Poolos Director

EFP/ADC/JMW/kbh

Birmingham Office 110 Vulcan Road Birmingham, AL 35209-4702 (205) 942-6168 (205) 941-1603 (FAX) **Decatur Office**2715 Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)

Coastal Office 1615 South Broad Street Mobile, AL 36605 (251) 450-3400 (251) 479-2593 (FAX)

ENVIRONMENTAL ASSESSMENT

The WW&SB of the Town of Ardmore Limestone County, Alabama CWSRF Project No. CS010904-02

A. Proposed Facilities and Actions

The Waterworks and Sewer Board of the Town of Ardmore proposes a project to renovate and expand the existing wastewater treatment plant to meet current demand. The project consists of upgrades to the influent pumping station, headworks, various basins, aeration and disinfection portions of the plant. The project will increase capacity, reduce I&I, and improve sustainability and reliability throughout the system and allow the system to remain in compliance.

B. Existing Environment

The Town of Ardmore is located in Limestone County, Alabama and is situated in the Huntsville/Decatur Metropolitan Statistical Area. Ardmore lies within the Highland Rim region which consists of ridges and valleys, with elevations ranging between approximately 800 feet and 920 feet above sea level. The geology is primarily Ordovician limestone with knobby hills capped by Devonian Chattanooga Shale and Mississippian carbonate units. The climate includes an average annual temperature of 60 degrees Fahrenheit and average annual rainfall of 54 inches.

C. Existing Sewer Facilities

The Ardmore WWTP has a permitted flow of 0.35 MGD. The WWTP includes three aeration basins, a clarifier, chlorine disinfection, and filtration prior to discharge to Piney Creek. Flows routinely exceed the permitted 0.35 MGD design capacity, with average flows ranging from 0.44 MGD to 0.58 MGD between 2019 and 2023 and a recorded peak of 1.6 MGD. The existing sanitary sewer collection system serves approximately 1,100 customers and includes 1.14 miles of 2-inch force main, 0.8 miles of 10-inch sewer main, 12.1 miles of 8-inch sewer main, and 257 manholes.

D. Need for Proposed Facilities

Due to aging equipment, hydraulic overloading, and anticipated changes in regulatory limits driven by TMDL modeling of the Tennessee River/Wheeler Lake, the existing Ardmore WWTP cannot reliably treat wastewater flows. High flows during weather events result in washout of beneficial biological populations and time delays in recovery. Most treatment components are near or beyond useful life. Renovations and capacity increase to 0.9 MGD are required to remain compliant and maintain reliable treatment.

E. Alternatives Analysis

The Environmental Information Document (EID) submitted considered the following feasible alternatives for this project.

1. <u>WWTP Alternatives</u>

a. Alternative No. 1: No Action (Not Chosen)

Taking no action would result in continued exceedance of the existing permitted flow, continued hydraulic overloading during weather events, and eventual inability to maintain compliance make this not a viable option.

b. Alternative No. 2: Operational Changes Only (Not Chosen)

The operational staff at the plant continues to perform routine maintenance in order for the plant to continue at peak performance. However, with anticipated changing effluent requirements, aging equipment, and flows that consistently exceed the permitted flow rate, additional operational changes will not significantly impact the current effluent quality or be able to meet potentially more stringent limits. Therefore, concerns need to be addressed by other means. The design capacity of the equipment has been exceeded and is not performing as intended. Changes in operations will not improve the efficiency of the equipment. Also, operational changes will not impact structural deficiencies of infrastructure due to age.

c. Alternative No. 3: Construct a New WWTP (Not Chosen)

While the plant and its infrastructure are aging, it is more economically feasible and environmentally sustainable to make upgrades to the existing facility in lieu of building a new treatment plant at another location.

d. Alternative No. 4: Upgrade Existing WWTP (Selected Alternative)

Improvements to the plant will allow for reliable treatment of the sewage, utilize areas already owned by the AWWSB, and make beneficial use of existing infrastructure where applicable.

2. Phase B – Sludge Lagoon Alternatives

a. Alternative No. 1: Modify Lagoon (Not Chosen)

Modifying the current size of the lagoon would have a greater impact on the environment and budget. Also, the existing site usage and soil conditions would not accommodate a significant modification.

b. Alternative No. 2: Construct New Mechanical Biosolids Facility (Not Chosen)

A new mechanical facility (for example, belt press) would result in substantially higher capital and O&M costs.

c. Alternative No. 3: No Action (Not Chosen)

Continuing without sludge removal would eventually make the lagoon non-functional.

d. Alternative No. 4: Dewater and Remove Lagoon Sludge (Selected Alternative)

Dewatering and removal of existing sludge provides the most reliable method for long-term lagoon performance.

F. Environmental Justice

As defined by the Environmental Protection Agency (EPA), environmental justice is the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations and policies. Fair treatment means that no group of people, including a racial, ethnic, or socioeconomic group should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies.

Presidential Executive Order 12898, "General Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing the disproportionately high and/or adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities.

It is anticipated that no environmental justice communities will be adversely affected by this proposed project. The construction of the proposed WWTP will provide substantial public health benefits by ensuring reliable wastewater treatment for the entire population within the city limits, with no disproportionate adverse impacts on any group.

G. Environmental Consequences; Mitigative Measures

Proposed project activities represent no overall or lasting adverse environmental impact except as normally and minimally associated with construction activities. Some short-term effects including increased noise levels, dust, exhaust emissions, increased stream turbidity and/or the disruption of normal traffic flow may be of minimal impact and occur during actual construction. While all such effects cannot be totally avoided, adherence to Best Management Practices (BMPs) during the course of the project will significantly minimize such conditions. Traffic disruptions will be greatly lessened by conformance to an approved traffic maintenance plan.

Endangered Species and Critical Habitat (USFWS)

The U.S. Fish and Wildlife Service was consulted for this project and has concurred with the proposed project presented and that no federally listed species/critical habitats are known to occur in the project area.

Historical and Archaeological (AHC)

The Alabama Historical Commission was consulted for this project and has concurred with the proposed project as presented. Concurrence is contingent on all construction activities occurring within either the rights-of-way or previously distributed areas.

Wetlands and Floodplains (COE)

The U.S. Army Corps of Engineers was consulted for this project. No discharge of dredge or fill material into jurisdictional waters or wetlands is involved. If future activities impact jurisdictional waters, the Corps will be contacted.

Top of Alabama Regional Council of Governments

The Top of Alabama Regional Council of Governments was consulted for this project and has concurred with the proposed project as presented.

H. Public Participation: Sources Consulted

A public meeting was held on October 3rd, 2024, at 5:00 PM in Ardmore, Alabama to inform the public and concerned interest groups about the proposed project. No public objections to the project work were expressed.

Sources to be consulted about this project for information or concurrence include the following:

Alabama Departments of:

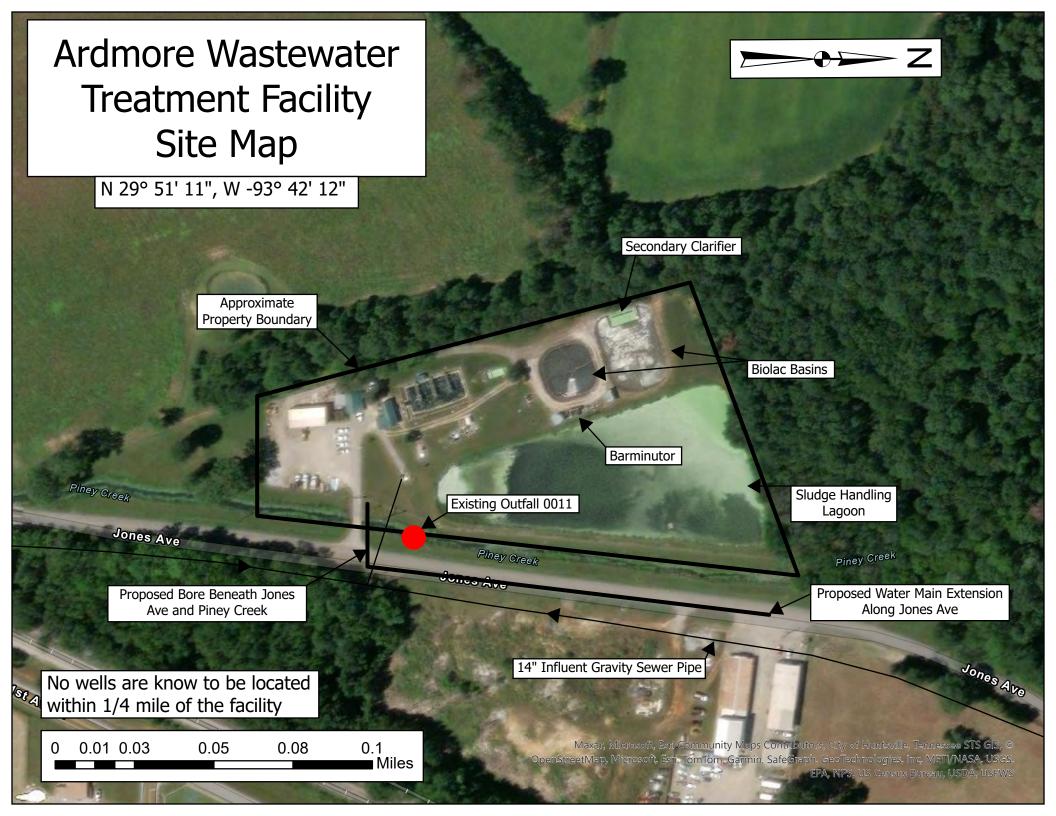
Agriculture and Industry Conservation – Game & Fish Economic and Community Affairs (ADECA) Public Health

Regional Planning Commission Alabama Historical Commission

U.S. Army Corps of Engineers

U.S. Department of Interior - Fish and Wildlife Service

U.S. Environmental Protection Agency

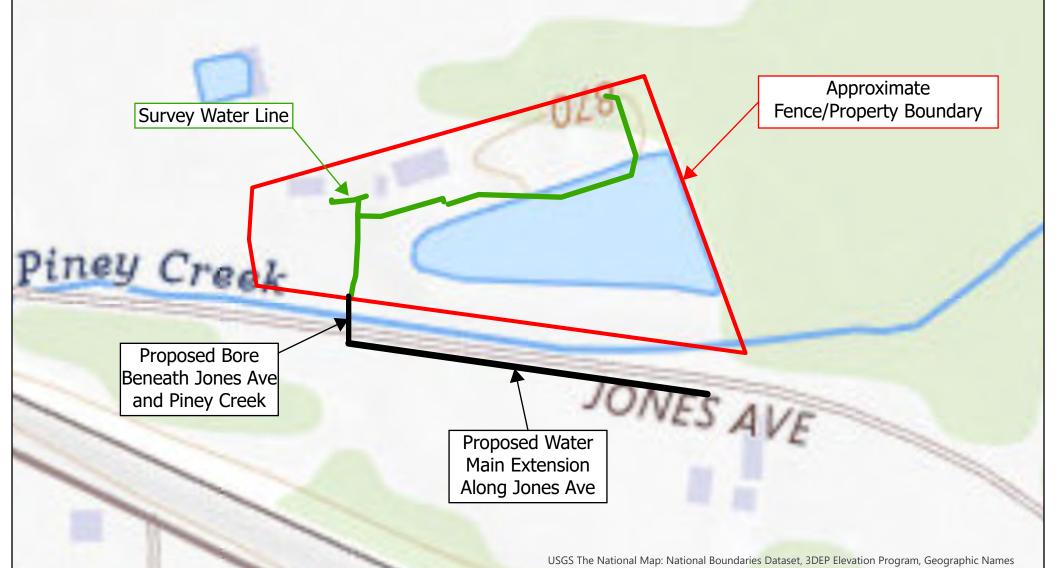


Ardmore Wastewater Treatment Facility Renovations



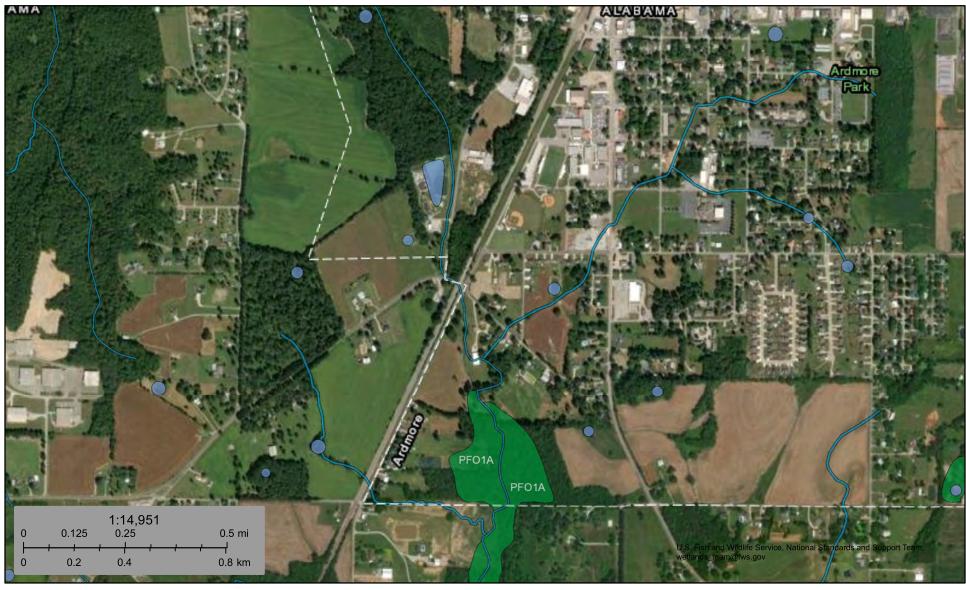
Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/Line data; USFS Road data; Natural Earth Data; U.S. Department of State HIU; NOAA National Centers for

Environmental Information



U.S. Fish and Wildlife Service National Wetlands Inventory

Ardmore Wetland Map



September 17, 2024

Wetlands

Estuarine and Marine Deepwater

Estuarine and Marine Wetland

Freshwater Emergent Wetland

Lake

Other

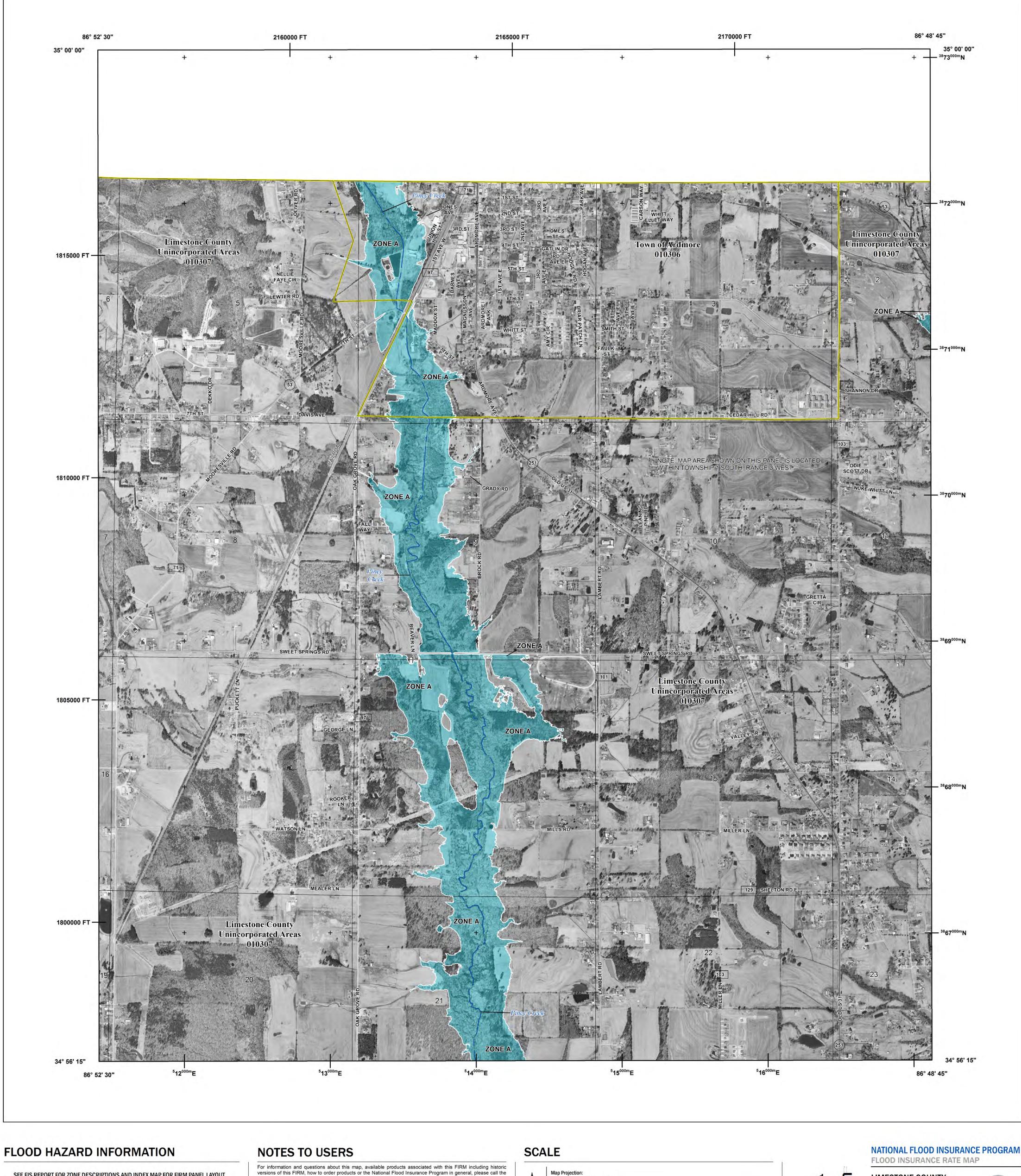
Freshwater Pond

Freshwater Forested/Shrub Wetland

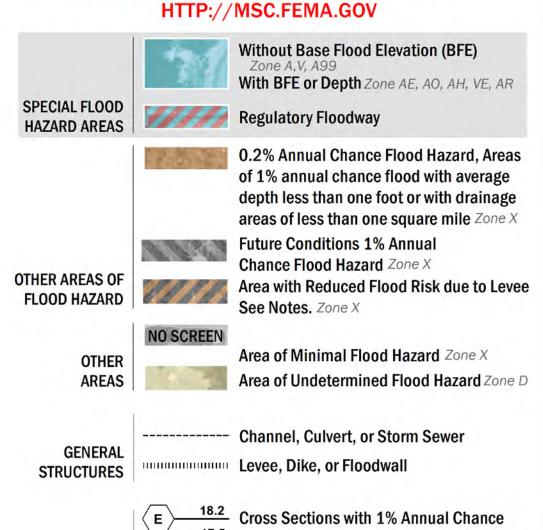


Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



SEE FIS REPORT FOR ZONE DESCRIPTIONS AND INDEX MAP FOR FIRM PANEL LAYOUT THE INFORMATION DEPICTED ON THIS MAP AND SUPPORTING **DOCUMENTATION ARE ALSO AVAILABLE IN DIGITAL FORMAT AT**



17.5 Water Surface Elevation (BFE)

(8)----- Coastal Transect

OTHER

FEATURES

— -- Coastal Transect Baseline

-- Profile Baseline

Limit of Study

- Hydrographic Feature

Jurisdiction Boundary

----- 513 ---- Base Flood Elevation Line (BFE)

For information and questions about this map, available products associated with this FIRM including historic versions of this FIRM, how to order products or the National Flood Insurance Program in general, please call the FEMA Map Information eXchange at 1-877-FEMA-MAP (1-877-336-2627) or visit the FEMA Map Service Center website at http://msc.fema.gov. Available products may include previously issued Letters of Map Change, a Flood Insurance Study Report, and/or digital versions of this map. Many of these products can be ordered or obtained directly from the website. Users may determine the current map date for each FIRM panel by visiting the FEMA Map Service Center website or by calling the FEMA Map Information eXchange.

Communities annexing land on adjacent FIRM panels must obtain a current copy of the adjacent panel as well as the current FIRM Index. These may be ordered directly from the Map Service Center at the number listed above.

For community and countywide map dates refer to the Flood Insurance Study report for this jurisdiction. To determine if flood insurance is available in this community, contact your insurance agent or call the National

Flood Insurance Program at 1-800-638-6620. Base map information shown on this FIRM was derived from multiple sources. This information was photogrammetrically compiled at a scale of 1"=100' from aerial photography dated 2014.

In cooperation with the Federal Emergency Management Agency (FEMA) and local

communities in Alabama, this Flood Insurance Rate Map (FIRM) was developed by the Alabama Office of Water Resources in a digital statewide format to assist communities in

their efforts to minimize the loss of property and life through effectively managing development in flood-prone areas. The State of Alabama has implemented a long term

approach to floodplain management to reduce the impacts of flooding. This is demonstrated by the State's commitment to mapping floodplain areas at the local level.

As part of this effort, The Alabama Office of Water Resources is working closely with FEMA as a Cooperating Technical Partner to produce and maintain this digital FIRM.

Please visit www.adeca.alabama.gov/floods for more information.

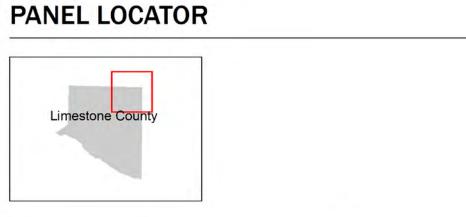
500

NAD 1983 UTM Zone 16N;

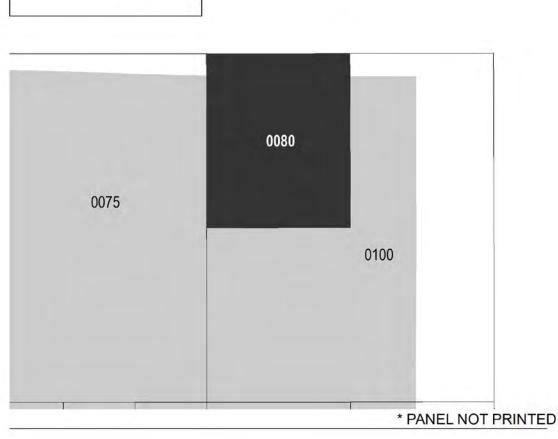
1 inch = 1,000 feet

1,000

Western Hemisphere; Vertical Datum: NAVD 88



2,000



LIMESTONE COUNTY, **ALABAMA**

and Incorporated Areas PANEL 80 OF 370

Panel Contains:

National Flood Insurance Program

FEMA

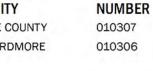
1:12,000

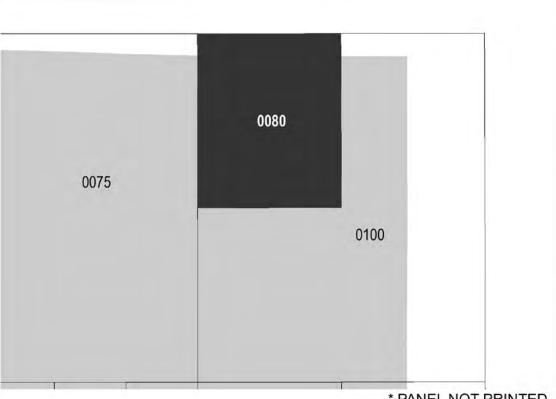
1,000

4,000

COMMUNITY LIMESTONE COUNTY

TOWN OF ARDMORE





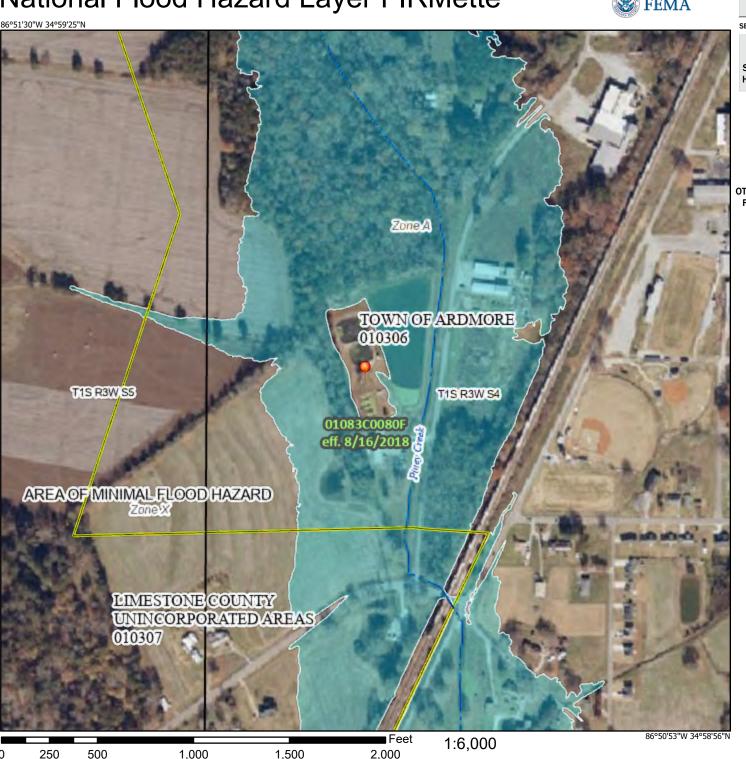
PANEL

0080

VERSION NUMBER 2.3.3.2 MAP NUMBER 01083C0080F MAP REVISED **AUGUST 16, 2018**

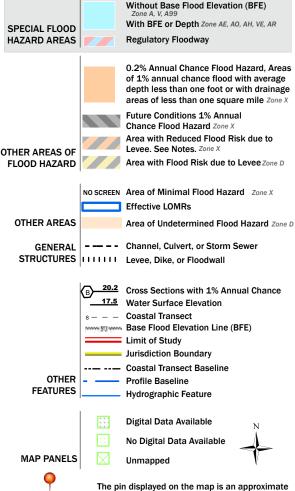
National Flood Hazard Layer FIRMette





Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT



This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

point selected by the user and does not represent

an authoritative property location.

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 9/18/2024 at 8:51 AM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

OLKERT

September 5, 2024

Project Name: Ardmore WWTP Improvements DWSRF Application

Project Code: FS010437-01 (Volkert Contract No. 1195001)

Mr. Bill Pearson Daphne ES Field Office U.S. Fish and Wildlife Service 1208-B Main Street Daphne, AL 36526

RE: Ardmore WWTP Improvements CWSRF Loan Application Intergovernmental Review

Dear Mr. Pearson:

The Water Works and Sewer Board of the Town of Ardmore (AWWSB) is proposing to submit a Clean Water State Revolving Fund (CWSRF) Loan Application to fund waste water plant infrastructure in Ardmore, AL. The project will be conducted within an area that has been previously disturbed and it has been determined that no endangered species or critical habitat will be negatively impacted by this project.

The current project includes renovations to the existing influent pumping station, construction of a new headworks, removal of the 1960s treatment basins and construction of new Sequencing Batch Reactor/Post equalization basins, filtration, UV disinfection and post aeration. Also, a permit request to ADEM to increase effluent flow from 0.35 MGD to 0.9 MGD is being prepared. Also, the existing lagoon utilized for sludge disposal is proposed to be cleaned. All of this work will be performed within the existing fence/property boundary. An approximately 1,745' water main extension along Jones Avenue right of way with a bore beneath the roadway and Piney Creek are proposed to support WWTP renovations.

In accordance with the application, we are requesting that a response from your agency be provided in writing including any comments and concurrence with the proposed loans. Please direct your response to AWWSB, c/o Melinda Immel, P.E., Volkert, Inc., 1110 Montlimar Dr., Suite 1050, Mobile, AL, 36609, or by email at melinda.immel@volkert.com.

Please call either Jillian Colby at (251) 342-1070 or me at (251) 680-9883 should you have any questions

or require any additional information.

Sincerely,

Melinda Immel, P.E. Assistant Vice President

U.S. Fish and Wildlife Service 1208-B Main Street - Daphne, Alabama 36526 Phone: 251-441-5181 Fax: 251-441-6222

No federally listed species/critical habitat are known to occur in the project area. As described, the project will have no significant impact on fish and wildlife resources. IF PROJECT DESIGN CHANGES ARE MADE, PLEASE SUBMIT NEW PLANS FOR REVIEW. We recommend use of best management practices specific to your project (See

.fws.gov/project/best-management-p

Alabama Ecological Services Field Office

William J. Rearson, Field Supervisor

Date

3

DEPARTMENT OF THE ARMY CORPS OF ENGINEERS, NASHVILLE DISTRICT WESTERN REGULATORY FIELD OFFICE 2424 DANVILLE ROAD SW



SUITE N DECATUR AL 35603

September 27, 2024

SUBJECT: File No. LRN-2024-00687; Water Works and Sewer Board of the Town of Ardmore (AWWSB), Wastewater Treatment Plant (WWTP) Upgrades, Piney Creek, Tennessee River Mile 310.7, Right Bank, Limestone County, Alabama

AWWSB c/o Ms. Melinda D. Immel Volkert, Inc. 1110 Montlimar Drive, Suite 1050 Mobile, Alabama 36609

Dear Ms. Immel:

This is in response to your letter dated September 6, 2024, requesting our comments regarding the Ardmore Phase 1 WWTP upgrades. The work includes renovations to the existing influent pumping station, construction of a new headworks, removal of the 1960s treatment basins, and construction of new sequencing batch reactor/post equalization basins, filtration, UV disinfection and post aeration. The work also includes an approximately 1,745' water main extension along Jones Avenue right-of-way with a bore beneath the Piney Creek to support WWTP renovations. This project has been assigned file number LRN-2024-00687, which should be referenced in all future correspondence regarding this project.

The U.S. Army Corps of Engineers (USACE) has regulatory responsibilities pursuant to Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 403) and Section 404 of the Clean Water Act (33 U.S.C. 1344). Under Section 10, the USACE regulates all work in, or affecting, navigable waters of the U.S. Under Section 404, the USACE regulates the discharge of dredged and/or fill material into waters of the U.S. (33 CFR Part 328).

Your letter indicates the proposed water line installation has been planned to utilize directional boring methods to install the water main line beneath Piney Creek identified within the project alignment. Directional boring beneath jurisdictional waters is an activity typically not regulated under Section 404 of the Clean Water Act (33 U.S.C. 1344) as this method of installation would not involve the discharge of dredged and/or fill material into waters of the U.S.

Based on our findings regarding the Ardmore WWTP upgrades, as specified herein, a Department of the Army (DA) permit pursuant to Section 404 of the Clean Water Act would not be required to implement the directional bore installation of main line crossing of Piney Creek, as proposed. Should any wetland resources be identified within the project alignment that would be impacted by other methods of

pipeline installation, such as open trench methods, a DA permit would be required. If the scope of work or project locations change, you are urged to contact this office for a verification of this determination.

We appreciate your cooperation with the USACE Regulatory Program. If you have questions regarding this matter, please contact me at the above address or telephone (256) 350-5620 (office), (256) 316-7188 (mobile), or at William.e.sinclair@usace.army.mil. Thank you for the opportunity to review and comment on this proposed project.

Sincerely,

William E Sinclair

Regulatory Project Manager

Regulatory Division

U.S. Army Corps of Engineers



ALABAMA HISTORICAL COMMISSION

Lisa D. Jones Executive Director State Historic Preservation Officer

> Tel: 334-242-3184 Fax: 334-242-1083

468 South Perry Street Montgomery, Alabama 36130-0900

September 24, 2024

Melinda Immel 1110 Montlimar Drive Suite 1050 Mobile, AL 36609

Re: AHC 24-1518

Ardmore Wastewater Treatment Plant Renovations

Limestone County

Dear Ms. Immel:

Upon review of the above referenced project, we concur that project activities will have no effect on cultural resources eligible for or listed on the National Register of Historic Places. Therefore, we concur with the determination of no effect to historic properties.

Consultation with the State Historic Preservation Office does not constitute consultation with Tribal Historic Preservation Offices, other Native American tribes, local governments, or the public. If archaeological materials are encountered during construction, the procedures codified at 36 CFR 800.13(b) will apply. Archaeological materials consist of any items, fifty years old or older, which were made or used by man. These items include but are not limited to, stone projectile points (arrowheads), ceramic sherds, bricks, worked wood, bone and stone, metal, and glass objects. The federal agency or the applicant receiving federal assistance should contact our office immediately. If human remains are encountered, the provisions of the Alabama Burial Act (*Code of Alabama* 1975, §13A-7-23.1, as amended; Alabama Historical Commission Administrative Code Chapter 460-X-10 Burials) should be followed. This stipulation shall be placed on the construction plans to ensure contractors are aware of it.

We appreciate your commitment to helping us preserve Alabama's historic archaeological and architectural resources. Should you have any questions, please contact Eric Sipes at 334.230.2667 or Eric.Sipes@ahc.alabama.gov. Have the AHC tracking number referenced above available and include it with any future correspondence.

Sincerely.

Lee Anne Hewett

Deputy State Historic Preservation Officer

LAH/EDS/lah



Top of Alabama Regional Council of Governments

Area Agency on Aging • Economic Development District • Regional Planning Agency

Connie Spears
President

James Lucas Vice President John Myers Secretary Bob Joslin Treasurer Larry Chesser Ex-Officio

Michelle Gilliam Jordan, FAICP | Executive Director

09/25/24

Billy W. Shannon, Chairman Ardmore Waterworks and Sewer Board 26772 Main Street, Ardmore, AL 35739

CLEARINGHOUSE MEMO

RE: Limestone County: Water Works and Sewer Board of the Town of Ardmore: State Revolving Fund (SRF) Grant Funding: Application for Wastewater Treatment Plant (WWTP) renovations. Including treatment capacity/effluent flow permit increase, and water main extension along Jones Avenue: All activities located on Utility property, and/or public ROW.

The Clearinghouse of the Top of Alabama Regional Council of Governments, in accordance with Executive Order 12372 and State Executive Order Eight, met on 09/24/24 and has reviewed the above-referenced Action.

The proposed project includes renovations to the existing influent pumping station, construction of a new headworks and Sequencing Batch Reactor/Post equalization basins, removal of old treatment basins, construction of new UV disinfection and post aeration, cleaning of the sludge disposal lagoon; and a 1,745' water main extension along Jones Avenue ROW with a bore beneath the roadway and Piney Creek to support WWTP renovations. The listed additions/upgrades are all in/on Ardmore WWSB property/facilities, or public rights-of-way and as such, previously disturbed and documented areas.

The project actions will upgrade the system in terms of efficiency, treatment ability and insuring public health and safety standards. The Project will follow associated ADEM and Federal Guidelines, and Construction Best Management Practices (CBMPs) will be required and be included in the Construction Contract Documents.

The Project is based on a professionally prepared engineering analysis, and this review assumes the above facts, and that the Project's EID finds that the execution of the above listed activities and the required bores for the line extension all meet ADEM/EPA environmental guidelines. The project's activities will upgrade the system's overall efficiency and capacity, and enhance public health related reliability standards, all actions deemed desirable and necessary goals.

This project is consistent with the Ardmore WWSB's long-standing goal of providing reliable, well-maintained and efficient wastewater services to the public, and full compliance with applicable environmental agency regulations. We therefore find this project to be in conformance with, and support of, critical utility service needs and recognized goals for utility planning within the TARCOG region, and we concur with, and endorse it. If we can be of further assistance, please contact us.

Sincerely,

D. C. Schafer

Area-wide Clearinghouse

Cc: Volkert, Inc.: Melinda D. Immel, P.E.