



Project Clean Water
Environmental Information Document

November 9, 2021

City of Alexander City



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1. Existing Environment

The project scope includes the design and construction of adequate assets to convey wastewater from the Kellyton Industrial Park to the Sugar Creek Wastewater Treatment Plant (WWTP) for treatment and discharge. The Kellyton Industrial Park is located in Coosa County, Alabama, adjacent to U.S. Highway 280 approximately 3 miles west of the Alexander City sewer service area. While physically located in Kellyton, Alabama, in Coosa County, and one of the few sources of revenue for Coosa County, the Lake Martin Industrial Development Authority owns the property for the proposed Project Area. The Sugar Creek WWTP is located in Tallapoosa County, Alabama, in the City of Alexander City approximately 6.5 miles east of the Kellyton Industrial Park. The nearest metropolitan statistical area (MSA) to the project site is the Auburn-Opelika MSA which is approximately 40 miles southeast of the Project Area. Figure 1 shows the project area in relation to the Alexander City sewer service area. The project area in relation to the county and state borders and the nearest MSA is shown in Figure 2. The project area and proposed facilities plotted on the most current USGS Quadrangle Maps are included in Appendix A of this document.

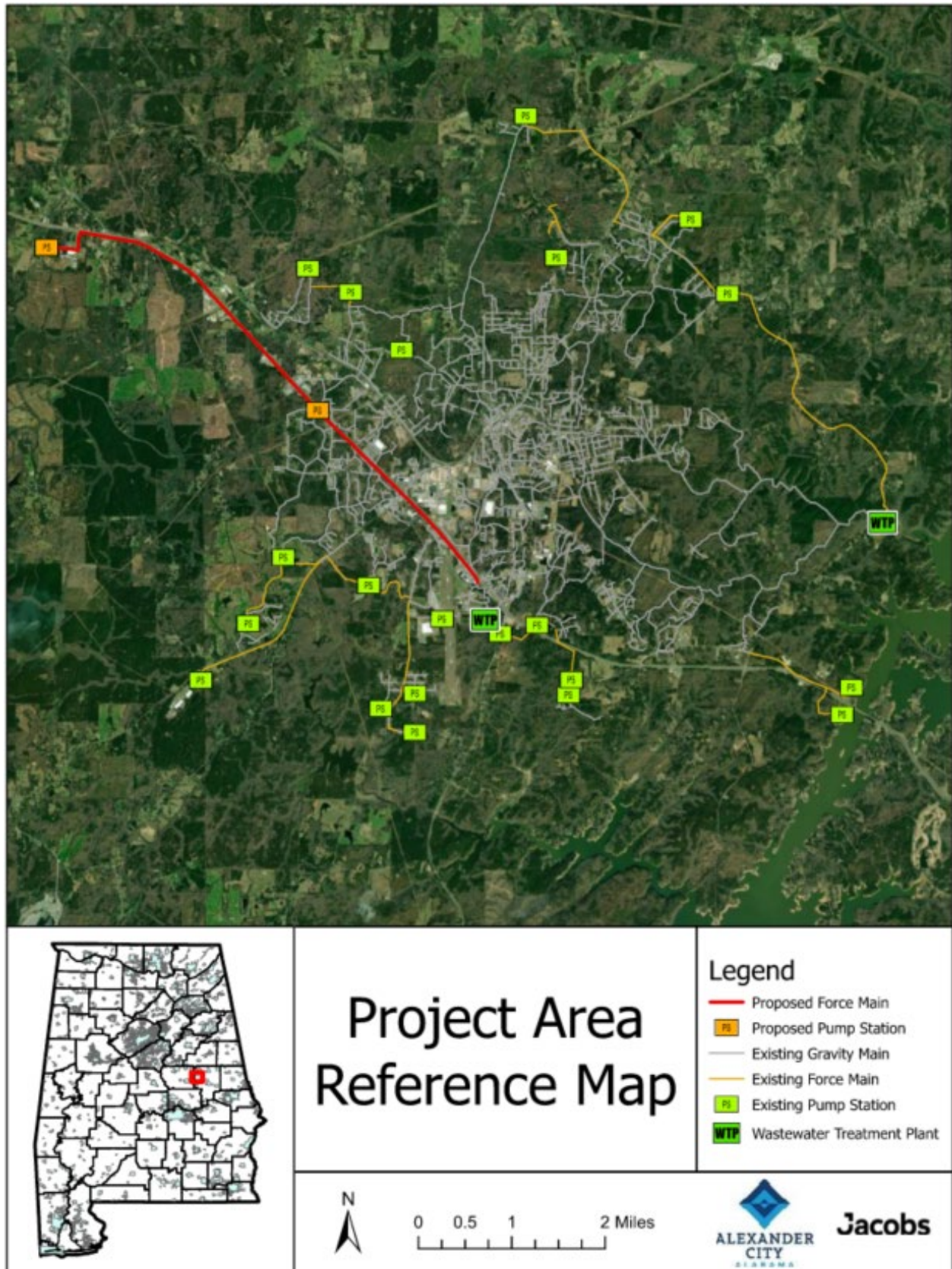


Figure 1: Project Area Reference Map

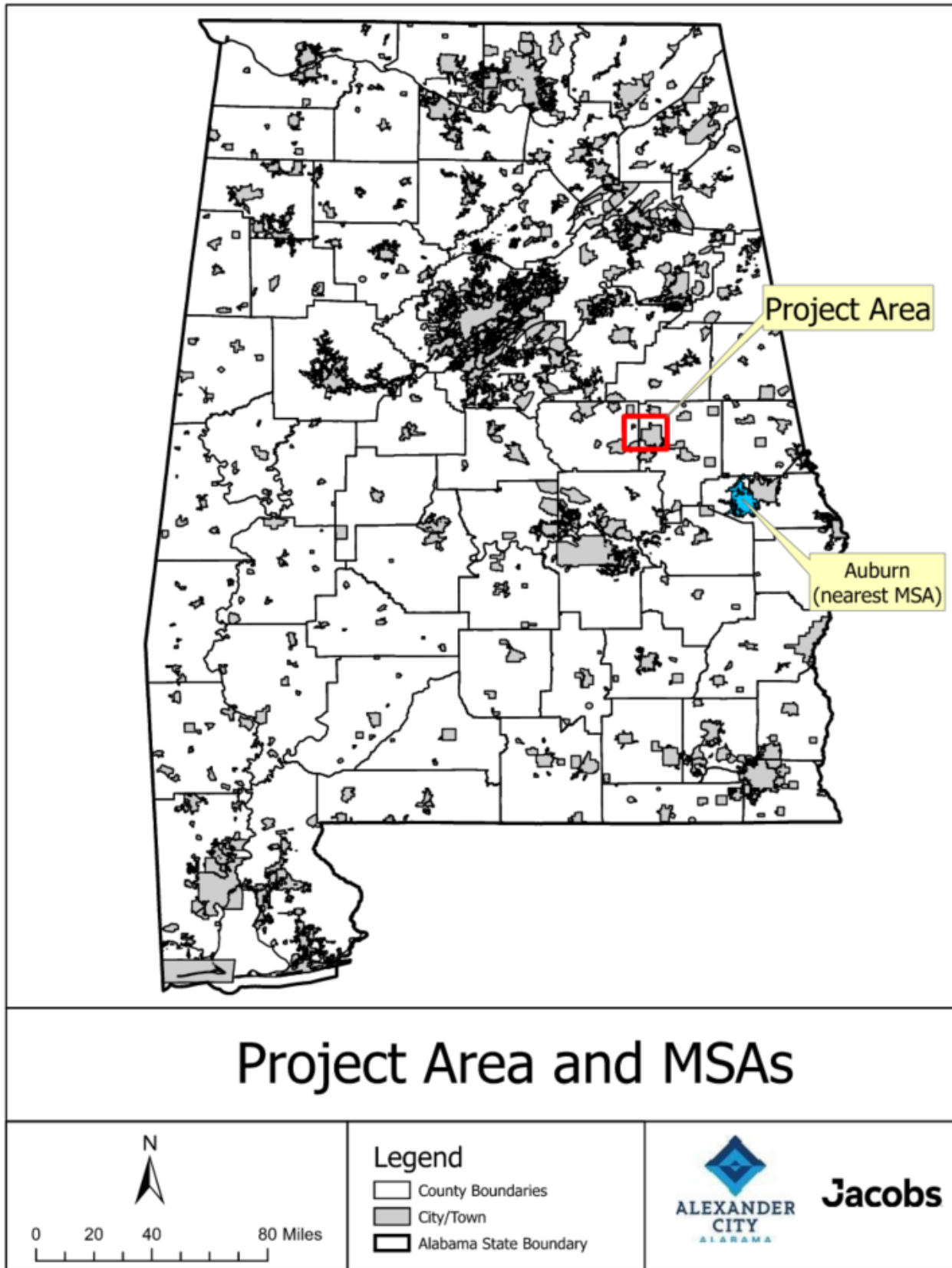


Figure 2: Project Area and Metropolitan Statistical Areas (MSAs)

2. Existing Facilities

The project will consist of constructing two new pump stations, connecting force mains and other appurtenances such as air release valves, which will convey wastewater flow to the City's Sugar Creek WWTP to be treated before discharge to the Tallapoosa River. The Sugar Creek WWTP is a municipal discharge currently operating under NPDES permit number AL0048861. The WWTP is in full compliance of its permit.

The project will serve customers currently located in the Kellyton Industrial Park which are served by a small underground injection control (UIC) system. The UIC system does not have adequate treatment capacity to serve the known customers. Once the project is complete, wastewater service to these customers through the use of the UIC can be discontinued, and the current UIC NPDES permit (ALSI9919674) can be terminated. The City's nearest existing gravity sewer on the south side of U.S. Highway 280 is approximately 3.6 miles to the east of the project site, but there is insufficient capacity in the existing gravity sewer to accept this additional flow from the Kellyton Industrial Park. However, there is an existing 30-inch diameter gravity sewer approximately 6 miles from the Kellyton Industrial Park that has the required available capacity and is in good condition per recent inspections although it is likely to be required to be lined for future protection against corrosion. This existing gravity sewer will transfer flow to the Sugar Creek WWTP, which is approximately 3500 feet downstream of the tie in point of the new infrastructure to the existing 30-inch gravity main.

The existing sewered population for the City is approximately 5,735 people of the City's total population of 14,317. The project will provide wastewater services to existing customers in the Kellyton Industrial Park currently served by an outdated UIC system. The project will also allow the City to have the ability to intercept wastewater from approximately 150 sewer connections (approximately 310 people) in a different sewer collection basin reducing the potential for sanitary sewer overflows in a basin with known capacity related overflow issues at the Springhill Pump Station.

3. Need for Proposed Facilities

The proposed project will provide a number of benefits to the City's sewer collection system. The main benefit of constructing the proposed facility will be the ability to terminate a UIC permit to ensure the ability to continue to provide sanitary sewer service to customers in Coosa County, an under privileged county with limited economic resources. Another benefit will be the ability to intercept wastewater that currently flows under U.S. Highway 280 to the Springhill Pump Station at the Robinson Road intersection. Several overflows have occurred at the Springhill Pump Station in the past during wet weather. Therefore, reducing flow to the Springhill Pump Station will benefit the operation of that station by reducing the potential for sanitary sewer overflows and keep the City in compliance with its NPDES permit number AL0048861. This will also allow the City to prioritize inspections and rehabilitation on fewer pipelines within the Springhill collection basin since the project includes a new pump station designed for the additional existing flow northeast of U.S. Highway 280. Figure 3 shows the gravity sewered area that would be intercepted as a result of the proposed PS 2.

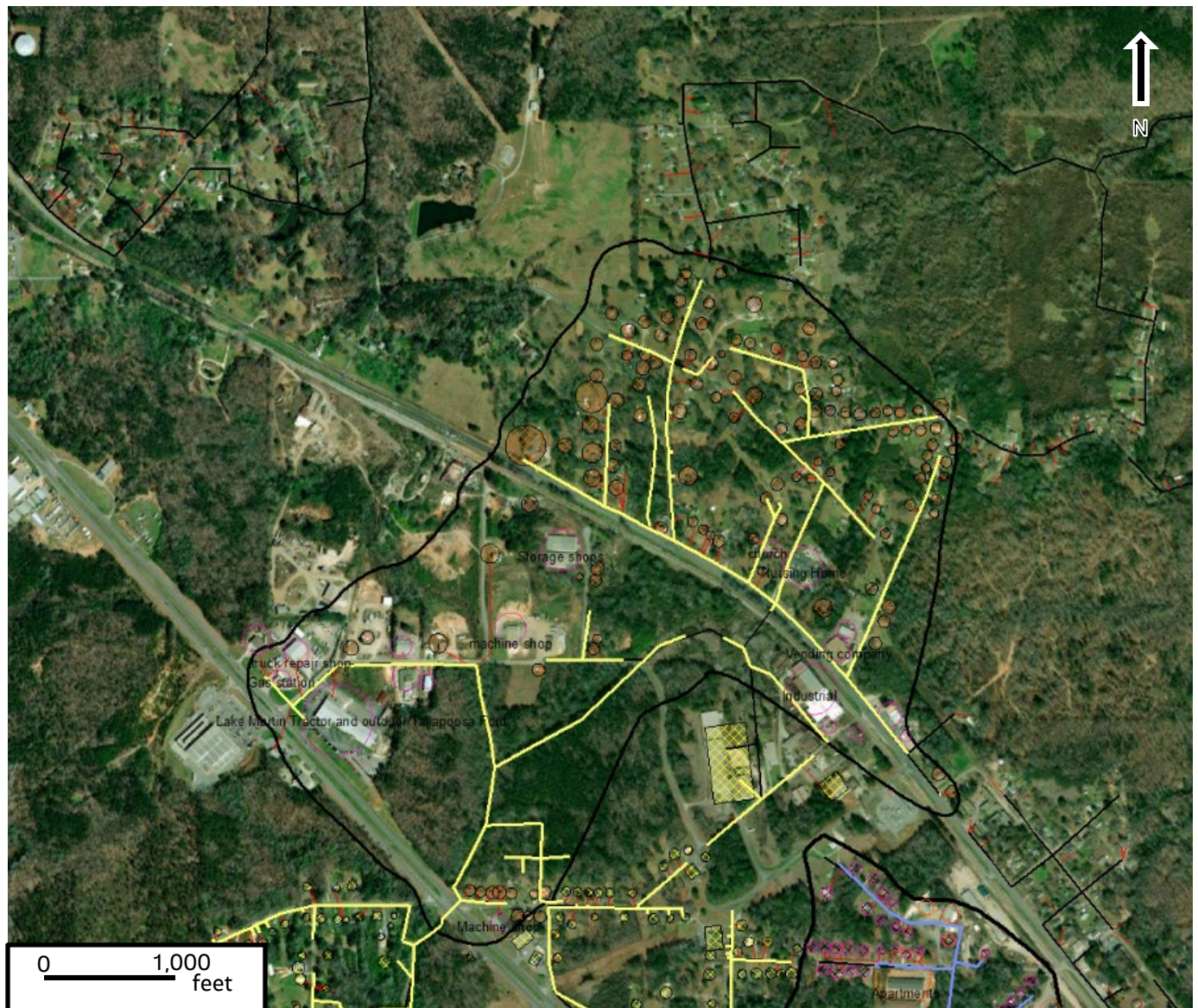


Figure 3: Gravity Sewered Area to be Removed from Existing Springhill Pump Station Flow

4. Proposed Facilities and Funding

4.1 Proposed Facilities

The proposed facilities include two pump stations and approximately 33,200 linear feet of force main as shown in Figure 1. PS 1 will consist of two submersible pumps with a capacity of 600 gallons per minute (gpm) each. From PS 1, approximately 20,000 linear feet of 10-inch HDPE force main will be installed to a second pump station, the Robinson Road Pump Station (PS 2). To serve PS 1 in the event of a loss of power, a fuel driven self-priming pump with a capacity of 600 gpm will be installed onsite at PS 1.

The Robinson Road Pump Station (PS 2) will be located generally at the intersection of Robinson Road and U.S. Highway 280. Land will need to be acquired to construct this pump station. The land acquisition process is underway and is expected to be complete before the project is advertised for construction. Once complete, the

City will own the property for the proposed pump station. The pump station will consist of two submersible pumps with a capacity of 850 gpm each. From PS 2, approximately 13,000 linear feet of 10-inch HDPE force main will be installed to an existing gravity sewer main located near the intersection of Airport Road and U.S. Highway 280. This existing gravity sewer has the required available capacity and is in good condition per recent inspections, although it is likely to be required to be lined for protection against corrosion. The existing gravity sewer will transfer flow to the Sugar Creek WWTP for treatment and discharge. To serve PS 2 in the event of a loss of power, a fuel driven self-priming pump with a capacity of 850 gpm will be installed at PS 2.

The anticipated flow sources of the project are to be from municipal and industrial sources. The average daily flow from all sources served by PS 1 is estimated to be approximately 170,000 gallons per day (gpd) with peak flow of 860,000 gpd.

The anticipated flow sources for PS 2 are expected to be flow from PS 1 at Kellyton Industrial Park along with other municipal sources located north of Highway 280, in the general vicinity of Robinson Road. The average daily flow from all sources, including flow from PS 1, are estimated to be approximately 1.2 MGD.

Flow from the two new pump stations, force mains and associated appurtenances will ultimately be conveyed to an existing gravity sewer that flows to the Sugar Creek WWTP (NPDES permit number AL0048861). This existing gravity sewer is located on the south side of the intersection of Airport Road and Highway 280. The Sugar Creek WWTP currently has a design capacity of 8.5 million gallons per day (MGD) and discharges into the Tallapoosa River. The plant currently treats wastewater flow from residential and commercial sources, but it once treated mostly industrial flow from the Russell and Avondale Mills. The mills have since shut down leaving the Sugar Creek WWTP currently operating at less than 20 percent of its rated capacity. Therefore, there is excess treatment capacity at the plant to receive the additional flow from the new pump stations.

Flow conveyed by the new pump stations and to the WWTP will be from existing facilities located at the Lake Martin Regional Industrial Park. The bulk of the wastewater flow is expected to be industrial. This flow is not expected to have a major impact on the treatment of wastewater at the Sugar Creek WWTP. The other flow is expected to be typical municipal and residential flow.

The sludge produced at Sugar Creek WWTP is currently disposed of through land application. Sludge is removed throughout the plant, dewatered through a belt filter press, and stored on-site in holding bays until ready for land application. Sugar Creek WWTP is registered with the Alabama Department of Environmental Management (ADEM) under Beneficial Use Generator Registration #BUG0000-000754-21 and Distributor Registration BUD0000-000754-21 and follows all beneficial use requirements in accordance with ADEM Admin. Code 335-13-16. Sugar Creek also submits a Biosolids Annual Report to the United States Environmental Protection Agency (USEPA) and follows all USEPA requirements pertaining to use and disposal of sewage sludge in accordance with 40 CFR 503. Sugar Creek WWTP has not had any violations or non-compliance issues with either entity. It is not expected that the project will contribute to any violations or non-compliance with regulations, nor will there be any expected changes to the solids handling process to maintain compliance.

4.2 Proposed Funding Sources

Along with the State Revolving Fund (SRF) Loan, three other funding sources are proposed to be used to fund the project. The total cost of the project is estimated to be \$12,000,000 in total. Table 1 shows the proposed funding sources, amounts, and status of the funding.

Table 1: Other Funding Sources

| Funding Source | Amount | Commitment Date | Status |
|--|-------------|-----------------|--------------------------|
| Alabama Graphite Products | \$500,000 | February 2021 | Funding obtained by City |
| Lake Martin Industrial Development Association | \$5,100,000 | May 2021 | Application Filed |
| CDBG Coosa County | \$1,000,000 | June 2021 | Application Filed |
| State Revolving Fund | \$5,400,000 | TBD | Application In Progress |

5. Alternative Analysis

An alternative analysis was performed to determine the viable options for serving the City's customers, complying with existing permits, and reducing sanitary sewer overflows (SSOs). To accomplish all objectives, various alternatives were considered. The first alternative was to take no action and continue utilizing existing infrastructure; however, this option did not address reducing overflows during wet weather, which are a violation of the City's existing NPDES Permit. The second alternative was to obtain a new NPDES permit for a new wastewater treatment facility at the Kellyton Industrial Park. This alternative was not feasible due to the characteristics of the receiving stream. The third option was to perform upgrades to existing infrastructure to provide additional capacity and prevent overflows during wet weather. This option was not viable due to the number of manholes, gravity pipeline segments, pump stations and related force mains that would need to be analyzed for capacity and condition and then rehabilitation performed. The fourth and final option was to construct two new pump stations and connecting force mains to be able to adequately serve customers and reduce a portion of the flow for a subsequent pump station downstream that has experience elevated SSOs in the past. Therefore, this option was selected and evaluation of locations of pump stations began. The first pump station would be located at or near the existing UIC pump station. The second pump station would be located at the intersection of Robinson Road and Highway 280 to intercept flow from north of Highway 280 and reduce the flow to the downstream Springhill Pump Station.

5.1 Topography

The project will be located in Coosa and Tallapoosa counties in Alabama. PS 1 will be located in the Town of Kellyton in Coosa County, and PS 2 will be located in Alexander City in Tallapoosa County. Sugar Creek WWTP is also located in Alexander City.

The Town of Kellyton is approximately 1 square mile in total area sitting at approximately 761 feet above mean sea level (amsl). While in the Town of Kellyton, the property in which the project is proposed is owned by the City of Alexander City and will convey wastewater to Alexander City's treatment plant. The City of Alexander City is approximately 42 square miles in area with an average elevation of approximately 705 feet amsl. The elevation of the City ranges from approximately 490 feet amsl at the banks of Lake Martin to 800 feet amsl in certain areas northwest of the City near Kellyton.

PS 1 is proposed to be constructed in the Kellyton Industrial Park which totals approximately 80 acres with the pump station having a footprint of roughly 1 acre. The elevation of the site is 724 feet amsl. The proposed PS 2 site (approximately 0.75 acres) will be located at the intersection of Robinson Road with U.S. Highway 280 approximately 3.4 miles to the east of PS 1. The elevation of the site is 673 feet amsl. New force main will be installed between PS 1 and PS 2, and from PS 2 to an existing gravity sewer just north of the Sugar Creek WWTP located at an elevation of approximately 660 feet amsl. The Sugar Creek WWTP sits at an elevation of approximately 640 feet amsl and discharges to the Tallapoosa River which has a surface elevation of 490 feet amsl.

USGS Quadrangle topographic maps of the project and surrounding areas are presented in Appendix A.

5.2 Geology

The general geology of the Kellyton and Alexander City area are mostly composed of rock from the Northern Piedmont Intrusive Rock system with a small row of rock from the Northern Piedmont High-Grade Metamorphic and Igneous Rock system on the east side of the City. For the most part, the Intrusive Rocks include mostly Elkahatchee Quartz Diorite Gneiss with some Hissop Granite scattered about the area. As the Tallapoosa River is approached from the west, the High-Grade Metamorphic and Igneous Rock generally includes Wedowee Group undifferentiated, Hackneyville Schist, Pinchoulee Gneiss, and Emuckfaw Group undifferentiated in part with a thin layer of the intrusive rock Zana Granite.

The proposed PS 1 site contains the Intrusive Rock Elkahatchee Quartz Diorite Gneiss with potentially some Hissop Granite on the edge of the site. The proposed PS 2 site contains the Intrusive Rock Elkahatchee Quartz Diorite Gneiss. The proposed force mains for PS 1 and PS 2 mostly contain Elkahatchee Quartz Diorite Gneiss with spots of the High-Grade Metamorphic rock Pinchoulee Gneiss.

5.3 Hydrology

The major hydrologic feature in the area is Lake Martin (Tallapoosa River). The lake is approximately 44,000 acres and is formed by the Martin Dam on the Tallapoosa River. Alexander City borders the lake on the west side of the river. Lake Martin (Tallapoosa River) is the receiving waterbody for the Sugar Creek WWTP discharge. Due to the size of the waterbody, no impact is expected from the project.

The Alexander City and Kellyton area contain multiple other small streams throughout. The two areas sit along and are divided by two major drainage basins, the Tallapoosa River Basin and the Coosa River Basin. Alexander City sits in the Tallapoosa River basin. Three different streams flow from the inner city of Alexander City to the Tallapoosa River – Sugar Creek, Coley Creek, and Whortleberry Creek.

The Town of Kellyton is located directly on the Tallapoosa River Basin/Coosa River Basin divide. There are four different streams in the Town of Kellyton, two which are located in the Tallapoosa River Basin (Oaktassi Creek and Harold Creek), and two which are located in the Coosa River Basin (Cat Creek and Socapatoy Creek).

The proposed project is not expected to contribute any major impacts to any of the surrounding waterbodies. PS 1 will be located near Cat Creek approximately 500 feet to the north. The force main from PS 1 does not cross any waterbodies between PS 1 and PS 2. There is an unnamed tributary to Elkahatchee Creek located near the proposed PS 2 site. The force main from PS 2 will likely need to cross a few small ephemeral streams. It is likely that these streams will not contain any water for most of the duration of the project. For this reason, it is likely that an open cut at the stream will be made. After installation of the force main, any disturbance in the streams will be returned to the original conditions prior to the start of the force main installation.

5.4 Climate and Precipitation

The climate for the project area and surrounding areas, including Alexander City and the Town of Kellyton, is generally characterized by hot, humid summers and generally mild to cool winters. The annual average daily temperature is 63° F with an annual average low temperature of 51° F and an annual average high temperature of 75° F. The record low temperature is -6° F, and the record high temperature is 105° F. The average annual rainfall is approximately 57 inches with an annual average of 112 days of the year getting greater than or equal to 0.01 inches of rain. The average annual snowfall is 0.7 inches with an annual average of less than 1 day per year getting greater than or equal to 0.1 inches of snow. The growing season generally lasts approximately 209 days between April and November. The average last spring frost date is April 5th, and the average first fall frost

date is November 1st. The prevailing winds change throughout the year but are generally most often from the south between March and June, from the west between June and August, from the east between August and November, and from the north between November and March. The average wind speed is typically between 3 and 5 miles per hour.

5.5 Floodplains, Floodways, and Wetland Impacts

Both PS 1 and PS 2 are located in an area that FEMA defines as “Area of Minimal Flood Hazard, Zone X”. This place both sites above the projected 500-year flood elevation. This project and all of the alternatives as presented in the Alternative Analysis section are not expected to have any effect on a floodplain, floodway, or wetland area. Applicable Flood Insurance Rate Maps (FIRM) showing the project location are included in Appendix B.

5.6 Force Main to be Constructed

There will be approximately 33,200 total linear feet of force main constructed for the project consisting of approximately 20,000 linear feet to be constructed between PS 1 and PS 2, and approximately 13,200 linear feet to be constructed between PS 2 and the existing gravity sewer main. All force main is proposed to be 10-inch diameter high density polyethylene (HDPE) pipe.

The force main will be constructed at a minimum of 7 feet depth and a minimum of 6 feet away from the existing water main. The proposed force main will be installed mostly by open cut methods from PS 1, along McClellan Industrial Drive, and along the east side of McClellan Industrial Drive to the intersection of U.S. Highway 280. The specification for the project will include provisions for the contractor to install the force main by horizontal directional drilling (HDD), also. In accordance with ALDOT standards, the proposed force main along U.S. Highway 280 will be installed the maximum distance from the edge of pavement as possible within the right-of-way along the south side of U.S. Highway 280 corridor. The force main is anticipated to be primarily installed by horizontal directional drilling (HDD) to avoid existing utilities in the area and minimize restoration requirements. The contractor will provide recommended means and methods.

Flow from PS 2 will be discharged into an existing gravity sewer located just west of the Sugar Creek WWTP. A new manhole will be constructed between two existing manholes at the connection of the proposed force main into the existing gravity sewer located near the intersection of Airport Road and U.S. Highway 280. The pipeline between these manholes is 30 inches in diameter and was cleaned and inspected in 2017. There is ample capacity in this gravity sewer from this location to the Sugar Creek WWTP, approximately 16 pipeline sections (or 3,500 feet) further downstream. Also, this pipeline was found to be in very good condition in 2017. This gravity sewer will be inspected every 5 years to ensure the condition does not deteriorate, especially if characteristics of the wastewater changes. If the pipeline condition is less than optimal, cured in place lining will be installed to extend its service life.

The design drawings showing the proposed pump stations and force main can be found in Appendix C.

6. Environmental Consequences and Mitigative Measures

6.1 Historical and Archaeological Features

A letter requesting concurrence with the project was submitted to the Alabama Historical Commission (AHC) on September 29, 2021. The letter was received by the AHC and given an AHC project number of AHC 2021-1246. A response from the AHC was received on October 29, 2021. Concurrence to the project was provided on the condition that all construction activities for the project will occur within existing or previously disturbed highway

right-of-way and/or other previously disturbed area. All of the project areas fall into that category. The PS 1 and PS 2 sites will be located on previously disturbed locations and all force mains in the project will be located on previously disturbed soils or within highway rights-of-way. Therefore, no additional cultural resource assessment will be needed. A copy of the concurrence request letter and the response letter can be found in Appendix D.

6.2 Endangered Species and Critical Habitat

A letter requesting concurrence with the project was submitted to the U.S. Fish and Wildlife Service on September 29, 2021. A response from the U.S. Fish and Wildlife Service was received on October 13, 2021. Concurrence with the project was provided within the letter. As stated in the response, "No endangered or threatened species or critical habitat are known to occur in the project area. As described, the project will have no significant impact on fish and wildlife resources." A copy of the concurrence request letter and the response letter can be found in Appendix D.

6.3 Floodplain, Floodway, and Wetlands

A letter requesting concurrence with the project was submitted to the U.S. Army Corps of Engineers (USACE) on September 29, 2021. The letter was received by the USACE Birmingham Field Office and given a file number of SAM-2021-01111 – The City of Alexander. No response from the USACE has been received as of the preparation of this document. A copy of the concurrence request letter can be found in Appendix D.

6.4 Alabama Power Company

Since Alabama Power Company (APCO) will be providing power to the pump station sites, they have been contacted about the project. A meeting will occur onsite with a representative from APCO once design has progressed.

6.5 Regional Planning Agency

A letter requesting concurrence with the project was submitted to the East Alabama Regional Planning and Development Commission (EARPDC) on September 29, 2021. A response from the EARPDC was received on October 22, 2021. Concurrence and support of the project was provided. The EARPDC did not have any further comments. A copy of the concurrence request letter and response can be found in Appendix D.

6.6 Environmental Justice

Environmental justice indicators were reviewed using the United States Environmental Protection Agency's (USEPA) environmental justice screening mapper, EJSCREEN. The mapper presents three difference indicators/indexes to rate environmental justice areas. These indicators/indexes include Environmental Indicators, Demographic Indicators, and EJ Indexes. An EJSCREEN report generated from this mapper can be found in Appendix E.

The project is not expected to have any negative impacts to any Environmental Justice areas. The project is expected to improve the existing sewer collection system and provide positive impacts to the area by eliminating an UIC system and potentially alleviating existing SSOs in an area that has experienced elevated SSOs in the past. Furthermore, the population near the project is minimal, further reducing any impacts related to any environmental justice involvement.

6.7 Pollution from Construction Activities

Best management practices (BMP) will be followed to minimize and eliminate as much pollution from construction activities as possible. It is expected that this project will involve typical construction noises, dust, etc. It will be the responsibility of the contractor to develop and follow BMPs that eliminate construction pollution to the fullest extent possible.

Noise control will be provided by the contractor where applicable. The contractor will develop a noise control plan if necessary, that will outline a plan to mitigate construction noise and to comply with any noise control ordinances, including the method of construction, equipment to be used, and acoustical treatments. If necessary, the contractor will also provide acoustical barriers so that noise emanating from tools or equipment will not exceed legal noise levels.

Air pollution will be minimized from construction operations. The contractor selected will be required to follow the following air pollutions control measures at minimum:

- There will be no burning of waste material, rubbish, or other debris allowed onsite.
- Operations involving dumping of dirt and rock and carrying rock or dirt away will be conducted to cause a minimum of dust.
- Unpaved streets, roads, detours, or haul roads used in construction will be given a dust-preventative treatment.
- Applicable environmental regulations for dust preventions will be strictly adhered.
- If applicable, temporary dust tight partitions, bulkheads, or other protective devices will need to be maintained during construction to prevent dust pollution to surrounding areas.

Erosion control measures will be implemented by the contractor at each site. In general, all activities shall conform to the Alabama Handbook and any city or county requirements. The contractor shall apply and comply with any necessary permits from the Alabama Department of Environmental Management or other applicable local entities. The contractor will also prepare a Construction Best Management Practices Plan (CBMP) specific for the project. No land disturbance activities will commence until all permits have been issued, and all erosion or sediment control practices shall be installed prior to commencement of land disturbance activities. Also, prior to land disturbance activities, the contractor shall clearly and accurately demarcate the limits of the land disturbance with clearing limit fence. The contractor shall also use standard BMPs to stabilize and control sediment from the site.

No public parks or prime agricultural land will be impacted from the project. The project will also not impact any 303d listed streams. While there are some small ephemeral streams that will need to be crossed with the force main, there is not expected to be any impacts to these stream crossings. BMPs will be implemented by the contractor to prevent any impact to these streams.

It is not anticipated that any land clearing will be necessary for the project. Should any clearing need to be completed, the contractor will provide and maintain any precautionary methods to be taken in order to protect the area environment from use of herbicides, defoliants, blasting, or cutting. It is expected that excavation of soil from each pump station site and some locations along the force main routes will be necessary to provide adequate geotechnical information for design of the infrastructure. Final disposal of the soil or dirt will be the responsibility of the contractor constructing the project. Any and all applicable rules or regulations will be followed by the contractor pertaining to the final disposal of any soil or dirt removed.

6.8 Public Participation

A public meeting will be held on December 7, 2021 at 5:30 P.M. local time at City Hall to collect any input from the community concerning the project. An advertisement for the public meeting was placed in the local

newspaper for the affected area as well as advertised on the City's website. The agenda and sign-in sheet for the public meeting and other related public participation information can be found in Appendix F of this document.