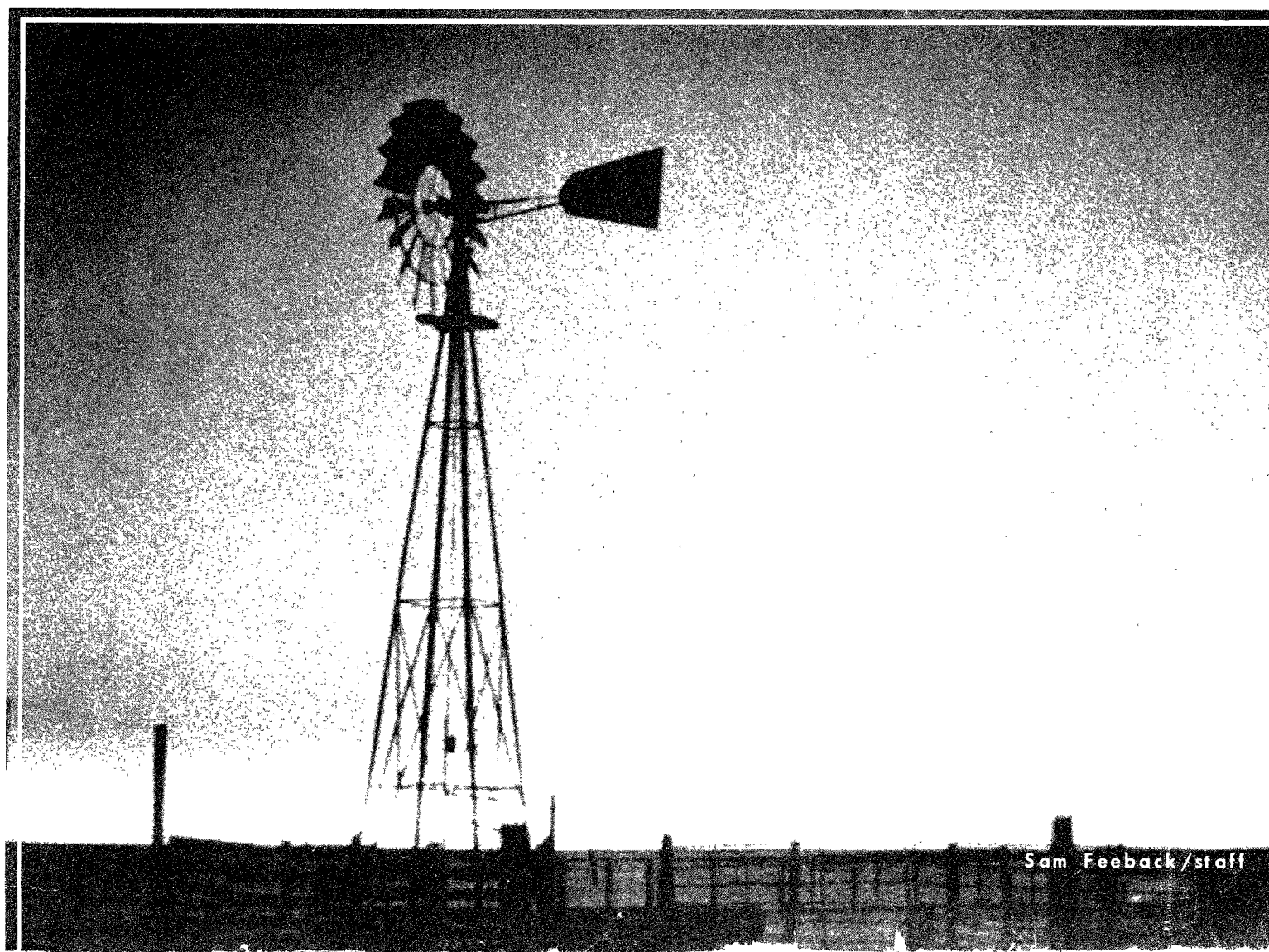




Environmental Final Impact Statement

Proposed Sewerage Facilities
Marion County Lake
Improvement District
Marion County, Kansas





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
324 EAST ELEVENTH STREET
KANSAS CITY, MISSOURI - 64106

DEC 29 1980

TO: ALL INTERESTED GOVERNMENTAL AGENCIES, PUBLIC GROUPS, AND CITIZENS

Enclosed is a copy of the Final Environmental Impact Statement (EIS) for the Proposed Sewerage Facilities, Marion County Lake Improvement District, Marion County, Kansas. This document is submitted pursuant to Section 102(2)(C) of the National Environmental Policy Act of 1969 (Public Law 91-190). All comments submitted to this Agency on the Draft EIS and our responses have been incorporated into the Final EIS.

Administrative action on this project will not be taken until 30 days after the Notice of Availability of this document is published in the Federal Register. Any objections to the decision described in the Final EIS must be submitted to this office within the 30-day period.

After the 30-day period, we will issue a Record of Decision explaining what the final action taken by EPA will be and mitigative measures developed through the EIS process. Copies will be sent to all persons who received the Draft EIS or who request a copy.

Thank you for your interest in this project.

Sincerely yours,

Kathleen Q. Camin
for - Kathleen Q. Camin, Ph.D.
Regional Administrator

Enclosure

FINAL ENVIRONMENTAL IMPACT STATEMENT

For

PROPOSED SEWERAGE FACILITIES

in the

MARION COUNTY LAKE IMPROVEMENT DISTRICT

MARION COUNTY, KANSAS

Prepared by

U.S. Environmental Protection Agency, Region VII

Kansas City, Missouri

With Technical Assistance from Sverdrup & Parcel and Associates, Inc.

St. Louis, Missouri

Abstract: This Environmental Impact Statement examined five alternatives for the improvement of sewerage facilities in the Marion County Lake Improvement District, Marion County, Kansas. The environmental, social, and economic impacts of each of these alternatives were evaluated, along with appropriate mitigation measures. Based upon extensive field investigations, EPA has determined that sufficient water quality problems do not exist to merit funding under the Construction Grants program of the Clean Water Act of 1977, and therefore no further grant will be awarded for this project.

EPA will take no administrative action on this project for 30 days from the date that EPA's Office of Environmental Review publishes notice of availability of the EIS in the Federal Register.

For further information contact:

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APPROVED BY:


Kathleen Q. Camin, Ph.D.
Regional Administrator

DEC 27 1980

Date

SUMMARY

1. Background

The Marion County Lake Improvement District was awarded a grant from the U.S. Environmental Protection Agency (EPA) to plan sewerage facilities for the District, which presently has no public sewerage system. As a result of that grant, a Facility Plan was completed proposing a conventional sewage collection and treatment system to serve the entire planning area. To consider the potential effects of that plan, and to examine alternative methods of solving possible water quality problems at the Marion County Lake, EPA has prepared this environmental impact statement.

2. Setting

The Marion County Lake Improvement District (LID) is a small residential community surrounding the 150 acre lake, and is located approximately 2.4 miles southeast of the City of Marion in central Kansas. The planning area encompasses about 925 acres and contains approximately 67 permanent homes, 99 seasonal homes, and 56 trailers occupied seasonally or on weekends.

This development nearly surrounds the lake, although it is separated from the shoreline by county park land and Lake Shore Drive. The outlying portions of the planning area are devoted almost exclusively to cattle grazing. The general atmosphere is one of a small, quiet retirement community focused on the recreational resources of the lake and the county park. Park facilities include a boat-launching ramp, fishing dock, swimming beach, and limited picnic and camping facilities.

Population ranges from about 145 persons during the winter to about 670 during summer months. On holiday weekends, campers can bring the total to nearly 1700. The average day population is expected to increase about 40 percent over the 20-year planning period, although in absolute terms this amounts to an increase of only about 150 persons.

Present sewerage facilities consist entirely of on-site systems. There are approximately 150 septic tanks, 17 holding tanks, and 20 privies on private property around the lake. There are also several holding tanks and a septic tank system serving the various county park facilities. Because local soils are poorly suited for septic tank leach fields, and because lot sizes are generally quite small (many of the originally platted lots are less than one-eighth of an acre), there have been several failures of septic tank systems in recent years. These failing systems have been either repaired or replaced by holding tanks.

In 1973, the County instituted a Sanitary Code which now prohibits the installation of septic tank systems on lots smaller than one acre, or where the soil percolation rate is less than one inch per hour. This ordinance has stopped the proliferation of inadequate septic tank systems, but does not apply to units installed before 1973.

3. Proposed Project

The Facility Plan developed by consultants to the Lake Improvement District analyzed several alternative ways to improve sewerage facilities in the planning area. The project selected includes a conventional gravity collection system and a force main to the City of Marion's proposed treatment plant. This plant is presently being designed under a separate federal grant and is not a subject of this EIS. The district would enter into a cooperative agreement with the City to pay a proportional share of the construction, operation, and maintenance costs of the plant. The City plant will be a three-cell aerated lagoon with a surface area of approximately 12 acres, located northwest of the City of Marion. Discharge of the treated effluent will be to the Cottonwood River.

The Lake Improvement Districts proposed collection system would consist of nearly 13,000 feet of 8-inch sewer pipe and approximately the same length of small-diameter force mains. This system

would almost completely encircle the lake and would serve all existing development. Most of the collection lines, as well as the 10,000 feet of force main to the treatment plant, would be located in existing road rights-of-way. The collection lines have far greater capacity than would be necessary for the projected population at the lake because the Kansas Minimum Standards of Design recommend against gravity sewer pipes of less than 8 inches in diameter. The construction cost of this system is estimated at \$830,000.

4. Alternatives

Concern over the potential adverse economic impacts on local residents and the potential secondary impacts from induced development led EPA to explore other alternatives for sewerage facilities for the Marion County Lake area. As part of this analysis, more refined population projections were developed which significantly reduced the required capacity of the project. Because of this reduction, the Facility Plan proposed project and the total retention lagoon alternative were re-analyzed to determine if the relative cost-effectiveness of these alternatives would be affected. A new on-site systems alternative was also developed that would involve the repair or replacement of failing septic tank systems with holding tanks and the purchase of a pumping truck to service all the holding tanks in the LID. The alternative of taking no federal action was also examined in detail. In this case, it was assumed that septic tank systems failing in the future would either be repaired or replaced by holding tanks, and that all new development would comply with the existing sanitary code.

A number of other possible alternatives were also screened to see if any merited further analysis. These included pressure sewer and vacuum sewer collection systems and community leach fields serving clusters of individual septic tanks.

5. Water Quality Investigations

As a part of this EIS, EPA conducted a series of water quality investigations to determine present conditions at the lake and

to provide a basis for an assessment of the water quality impacts of each of the alternatives. Water samples taken from 85 wells in the area were tested for total coliforms, fecal coliforms, and nitrates. A septic leachate survey was conducted along the entire lakeshore to detect insufficiently-treated septic tank effluent entering the lake. An infrared aerial survey of the area was also conducted to detect septic tank leach field failures.

The results of these tests all indicated that there is not a serious water quality or public health problem at the Marion County Lake. The infrared aerial survey indicated only three possible septic tank leach field failures, while the septic leachate survey detected no septic leachate plumes entering the lake. Most nutrients entering the lake are believed to be borne in runoff from cattle grazing areas in the lake's drainage basin. Well water samples found only two readings above the national drinking water standards for nitrates, and four positive readings for fecal coliforms; these readings were attributed to deteriorated well casings.

6. Conclusions

Since no significant existing water quality problems could be identified, EPA has determined that the proposed project is ineligible for federal assistance under the Construction Grants Program of the Clean Water Act of 1977. Those few isolated problems that were detected can be corrected with local resources and within existing local programs, as has been done since the passage of the County Sanitary Code.

There are several actions that local interests could take to improve the operation and reliability of their on-site systems. These include more thorough inspections of the on-site systems and programs for reduction of water use. To reduce holding tank pumping costs, the residents at the Lake could use existing hydraulically-overloaded leach fields for grey water disposal and holding tanks for black water if they can demonstrate to the County Sanitarian that no public health hazard would result. The Lake Improvement District could also elect

to construct the proposed project entirely with local funds, although this would be quite expensive for the local residents.

7. Public Participation

The first major public involvement in the proposed project was the public hearing on the Facility Plan, held on June 14, 1979. Most statements made supported the Facility Plan project. At the commencement of the EIS process, a public workshop was held at the Marion County Lake Meeting Hall, on September 8, 1979. This meeting was attended by nearly 150 local residents, and included a presentation on the EIS process and the project alternatives under consideration. Since that time, EPA and EIS preparation team personnel have had numerous informal discussions with local residents and public officials.

The public hearing on the draft EIS was held on July 19, 1980, and was attended by approximately 35 persons. Most comments expressed disappointment that the project would not be funded, and the Lake Improvement District requested specific information on the criteria to be used in determining when problems that might develop in the future would be eligible for federal assistance. Over 220 copies of the draft EIS document were distributed to local residents and property owners for their review and comment.

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NOTE

Bibliographic references appear in the text of this document as arabic numerals in parentheses, thus: (1). These citations appear in numerical order in the REFERENCES section in the rear of the document.

Technical words, phrases, and abbreviations appearing in this document which may be unfamiliar to the layman are defined in the GLOSSARY section, which immediately precedes the Appendices.

I INTRODUCTION

The United States Environmental Protection Agency (EPA) is considering grant awards to the Marion County Lake Improvement District for the design and construction of sewerage facilities at Marion County Lake and Park, Marion County, Kansas. This environmental impact statement (EIS) assesses the potential impacts of those grant awards on the social, economic, and biological environment of the planning area.

A. DESCRIPTION OF THE PLANNING AREA

Marion County Lake is located in Marion County, Kansas, approximately 140 miles southwest of Kansas City, and 50 miles north-northeast of Wichita. The lake lies about 2.4 miles southeast of the City of Marion, the county seat. Figures 1 and 2 show the location of Marion County and the planning area.

The 150-acre lake serves as the focus of a recreation and retirement community for approximately 145 persons year-round. During the summer, the resident population increases to approximately 670, and campers at the County Park surrounding the lake swell the population to over 1700 on holiday weekends.

Present development consists of approximately 67 permanent homes, 99 seasonal homes, and 56 seasonal trailers around Lake Shore Drive. Inside this road is County park land, with limited facilities for camping, picnicking, and fishing. Beyond the developed area lie rolling grasslands used for grazing cattle. The planning area encompasses a total area of approximately 925 acres.

B. PROJECT HISTORY AND DESCRIPTION

1. Legislative Background

The Clean Water Act of 1977 (PL 95-217) provides for restoring and maintaining the integrity of our nation's waters. Realizing that

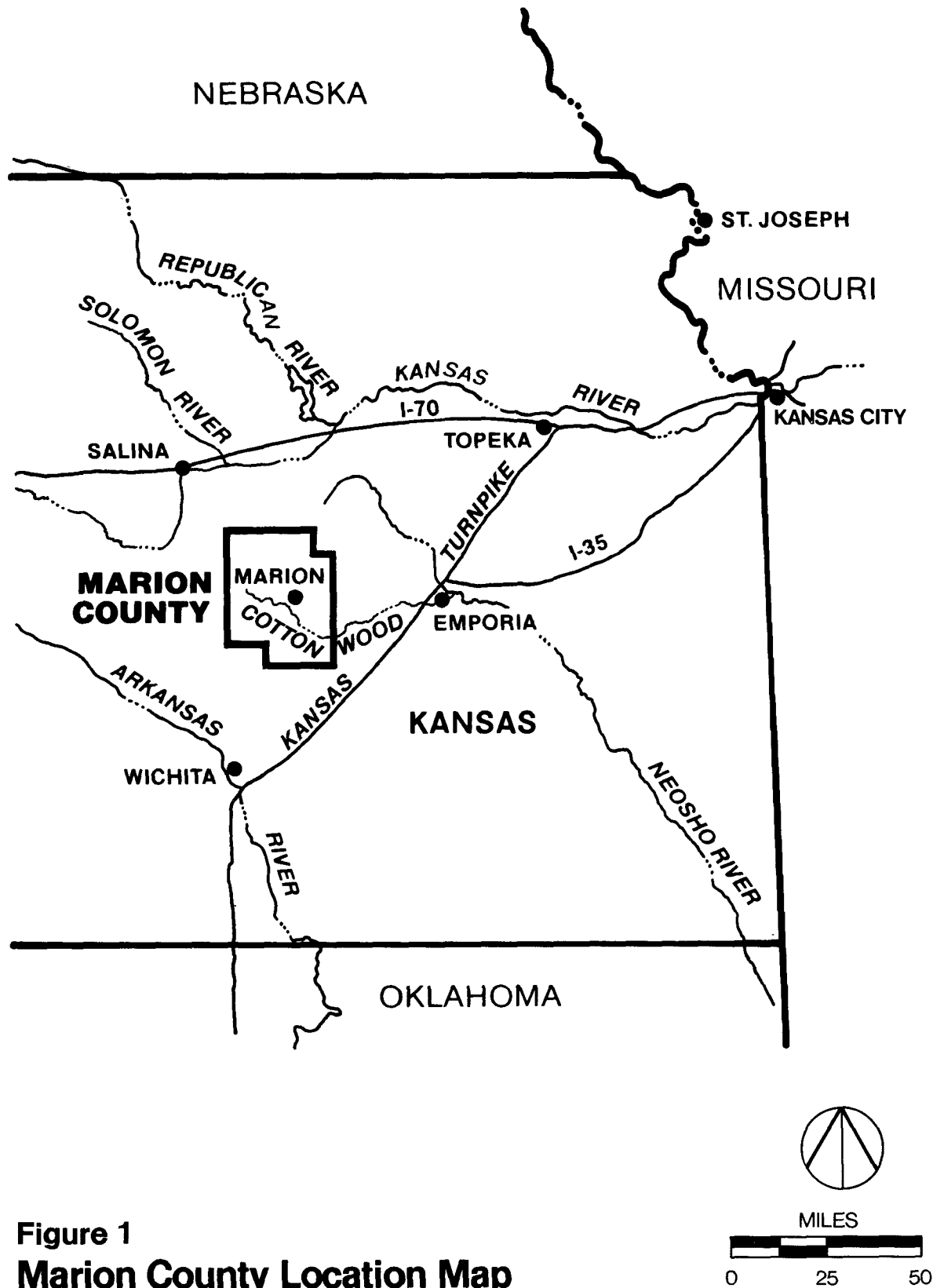


Figure 1
Marion County Location Map

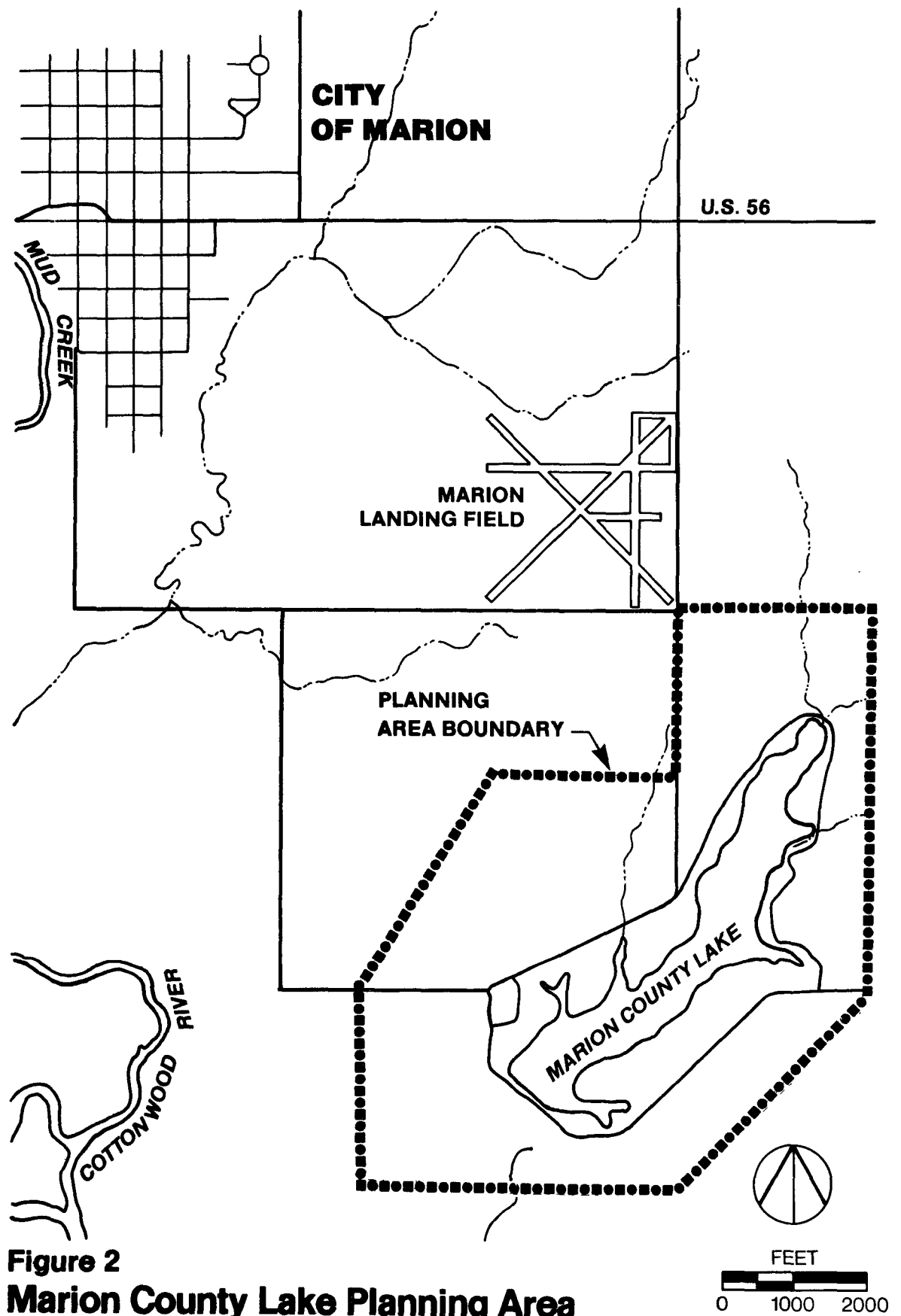


Figure 2
Marion County Lake Planning Area

local governments are not always financially capable of providing the necessary wastewater treatment facilities, Congress has authorized federal grant assistance for such construction under Section 201 of the Act. For conventional sewage treatment facilities, the Act authorizes grants up to 75 percent of the eligible project costs. To encourage new approaches to wastewater treatment, the Act will provide grants up to 85 percent of the project costs for "innovative or alternative" (I/A) wastewater treatment systems. The remaining project costs must be paid by the state and/or local governments.

This federal grant assistance is administered by EPA and is awarded in a three-step process. The first grant to the local government is for preparation of a Facility Plan, which is a preliminary engineering report analyzing treatment needs, alternative treatment methods, existing sewer system adequacy, cost estimates, and also includes an environmental assessment of the project proposed. Upon approval of the Facility Plan, a Step 2 grant is awarded to prepare detailed engineering plans and specifications. When these have been approved, the Step 3 grant is awarded to provide the federal share of the construction costs.

2. Description of Existing Facilities and Water Quality Problems

a. Existing Facilities. The present method of wastewater collection and treatment at the Marion County Lake is by individual on-site systems, including septic tanks, holding tanks, and privies. In 1973, Marion County adopted a sanitary code to regulate the installation of wells and septic tank systems (1). Nearly all of the septic tank systems previously installed at the lake would not have been permitted under this code, but the regulations were not retroactive. Septic tanks are not allowed to be built on lots smaller than one acre, where the soil percolation rate is less than one inch per hour, where there is a well within fifty feet, or where there is less than six feet of soil over impervious rock formations (1). Most of the subdivisions at the lake were originally platted as 50 foot by 100 foot lots, which are too small to contain a house, a well, and a well-designed

septic tank and leach field system. The pattern of development at the lake has been irregular because the actual property sizes varied widely, with many owners buying more than a single 50 foot by 100 foot lot.

There are twenty private privies around the Marion County Lake, of which nine are still being used, mainly by weekend visitors (2). There are eighteen holding tanks, eight of which were installed for new houses on lots too small for septic tanks. The others were installed either voluntarily or after an existing septic tank had failed (3). The total number of privately-owned septic tanks at the lake is estimated to be 150.

There are a number of septic tanks, holding tanks, and privies on the County-owned land at the lake (4). These are used by visitors and by the residents of the 56 trailers on leased County land. A 1,500-gallon septic tank behind the lake office serves the meeting hall and the lake manager's house and office. All other County-owned sewage systems at the lake are either holding tanks or vault privies, and are emptied as needed. These systems include two 800-gallon holding tanks near the heated dock, two 300-500 gallon holding tanks near the beach, and six privies dispersed around the lake. The facilities for the trailers on the County-owned land near the dam are located near the hall, and consist of two 1,200-gallon and two 800-gallon holding tanks, and a dumping station. Trailer residents are permitted to discharge wash water into nearby ditches, but it is difficult to ensure that that is all that is being discharged (5). Figure 3 shows the location of the septic tanks, holding tanks, and privies in the study area.

Records of failures of the on-site systems at the Marion County Lake were not kept before the enactment of the sanitary code in 1973, and not all failures are known because the systems are not regularly inspected. A few overt failures have occurred, with the subsequent installation of holding tanks or improved lateral lines.

Many of the holding tanks at the lake serve houses owned by weekend visitors, and need to be emptied only a few times per year.

Holding tanks owned by permanent residents may have to be pumped more frequently. The septic tanks at the lake are emptied when needed, as determined by the individual owners. The privately-owned privies are rarely emptied. Septage is removed from septic tanks, holding tanks, and privies by several local septic tank service companies, who discharge the wastes into the City of Marion's sewage treatment lagoons (6). Some of the pumped septage, however, is reportedly discharged on local fields, without the knowledge or authorization of the County Health Department (3).

b. Soil Constraints. Soils in the Marion County Lake area are mostly silty clays developed by weathering and erosion of the underlying limestone and shale deposits. Soil cover is generally thin (less than five feet), especially over the limestones. The limitations of various soils for use as septic tank leach fields are rated by the Soil Conservation Service as slight, moderate, or severe. All of the soils in the Marion County Lake area except those immediately below the dam have severe limitations for leach fields, as shown on Figure 4. More detailed information on soils in the study area can be found in Appendix B.

The Facility Plan submitted by the Marion County Lake Improvement District (LID) indicates that the present individual treatment systems in the study area do not adequately protect the community's health and environment from sewage contamination. Although it gives no documentation of extensive septic tank failures, the Facility Plan concludes that, based on the poor soil conditions, shallow soil depths, and small lot sizes, the septic tanks should be replaced. It further determines that there is a potential public health hazard from the septic tanks in the form of bacterial and chemical contamination of individual drinking water wells, and of the lake, which is used for swimming. The County Sanitarian concurs with the Facility Plan recommendations, based on the reported septic tank failures and contaminated wells, and on the soil and site conditions described above (7).

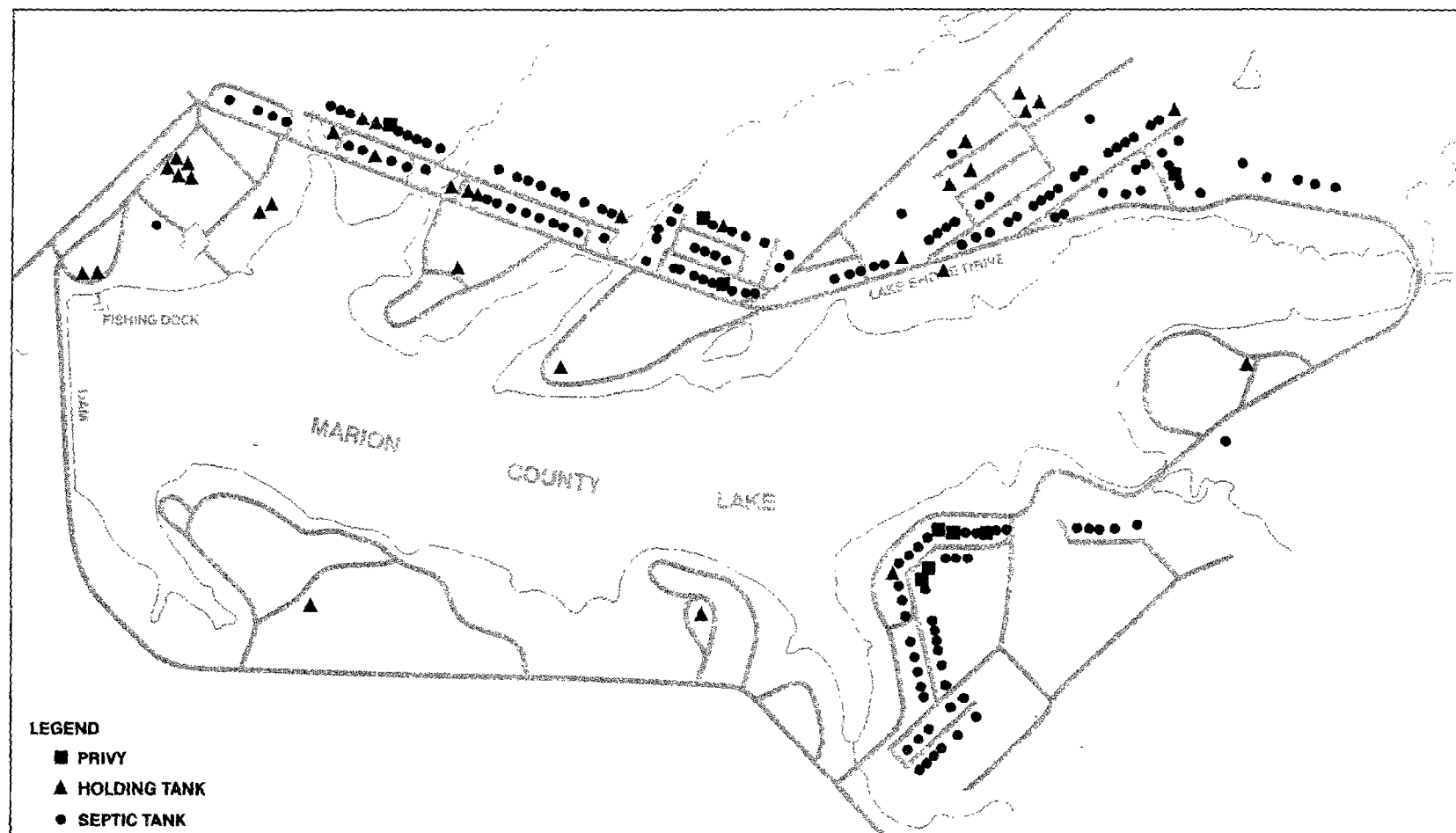


Figure 3
Existing Wastewater Treatment Facilities

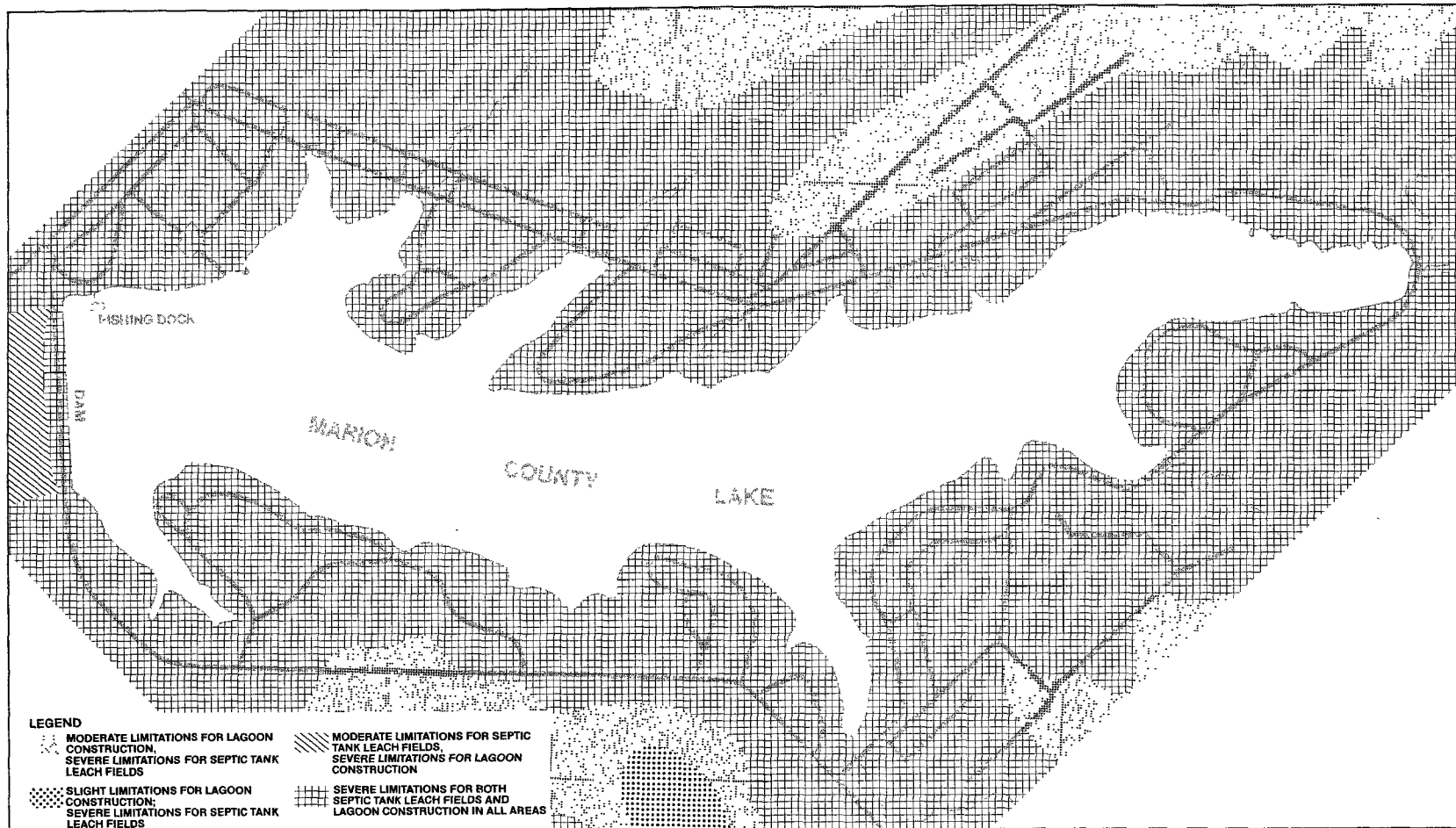


Figure 4
Soil Limitations for Sewage Treatment

3. History of the Grant Application

In view of this water quality situation, the Marion County Lake Improvement District determined to seek federal assistance to plan and construct sewerage facilities. The District applied for Step I planning funds on October 4, 1977. After review by the State of Kansas and the Flint Hills Regional Council, the A-95 review agency for the county, EPA awarded a Step I grant on May 8, 1978 for the development of a Facility Plan. The District then contracted with Reiss & Goodness Engineers of Wichita, KS, to prepare the Facility Plan, which was submitted to EPA on March 22, 1979. The Plan has been reviewed by EPA and the Kansas Department of Health and Environment and a final determination will be made in the Regional Administrator's Record of Decision, to be issued after the final EIS.

4. Facility Plan Alternatives

a. Treatment Alternatives. The Facility Plan considers 6 treatment system alternatives, which are compared on the basis of cost effectiveness and ability to abate existing and future water pollution and public health problems.

1) Lagoon with Zero Discharge. This alternative consists of a two-cell lagoon designed to dispose of the total wastewater flow by evaporation and percolation. It is rejected in the Facility Plan because the large amount of land required (approximately 25 acres) makes it uneconomical.

2) Aerated Lagoon with Continuous Discharge. This alternative consists of a three-cell lagoon, with an aerated cell accomplishing 70 percent of the five-day Biochemical Oxygen Demand (BOD₅) removal, and unaerated second and third cells removing the remaining BOD₅ necessary to meet effluent requirements. A total of three acres would be required for the lagoon. This alternative is rejected because of its high equipment, operation, and maintenance costs.

3) Lagoon with Land Application by Spray Irrigation. This alternative has a three-cell waste stabilization pond to provide the required 90-day storage and primary treatment, and spray irrigation of the effluent. This alternative is rejected because of the equipment

costs and large land requirements. The pond would require 16 acres, and 28 acres would be needed for irrigation.

4) Lagoon with Controlled Discharge. This alternative uses a four-cell lagoon with a total detention time of 120 days, so that discharges may be limited to periods of high flow in the receiving stream. The lagoons are not aerated, and must be shallow enough to avoid becoming anaerobic, which requires a large surface area. This alternative is rejected because of high land (approximately 11 acres required) and operation costs.

5) Lagoon with Continuous Discharge. A four-cell lagoon is proposed for this alternative. Although operation costs are less than for either the aerated lagoon or land application alternatives, land requirements are high enough (7 acres) to make this alternative uneconomical.

6) Regional Plant Concept. This alternative is selected by the Facility Plan as being the most desirable. It entails pumping Marion Lake's wastewater to the City of Marion's proposed new treatment plant. This plant will be a three cell aerated lagoon, northwest of the city. The facility will discharge treated effluent into the Cottonwood River. The effluent limitations for this facility will be 30 mg/l BOD₅ and 30 mg/l TSS, because the receiving stream is designated a Class B water (8).

b. Collection Alternatives

Five collection system alternatives are considered in the Facility Plan.

1) Vacuum Sewer System. This alternative is dependent upon maintaining a vacuum in all the collection lines. The vacuum sewer system alternative designed for the Marion County Lake area uses two central vacuum stations. The wastewater from several homes is collected by a short section of gravity sewer and discharged to a 30-gallon holding tank, from which it travels to a central vacuum station. The operation and maintenance of vacuum sewers are costly and difficult, and the system's reliability is suspect. For these reasons, this alternative is rejected.

2) Pressure Sewer System. Pressure sewers utilize sealed, small-diameter pipelines with a number of pressurizing inlet points, each serving one or more houses, and which join to a single outlet. The pressurized sewer system designed for the Marion County Lake uses grinder pumps at each home and business. Sewage flows to the grinder pumps, where it is reduced to a slurry and pumped to the treatment facility. The high cost of installing, operating, and maintaining individual grinder pumps precludes the selection of pressure sewers.

3) Holding Tanks. This alternative consists of installing reinforced concrete underground holding tanks at each home, to store all wastewater. A tank truck or, "honeywagon," purchased by the community would empty the holding tanks as needed, and haul the sewage to a nearby wastewater treatment facility, most likely the City of Marion's, for disposal. This alternative was rejected because of high operation and maintenance costs.

4) Septic Tanks and Lateral Lines with Improved Maintenance. In this alternative, a public body would be set up to supervise the installation and operation of all on-site systems at the Marion County Lake. There are a number of legal difficulties that would need to be resolved before such a system could be established. The Facility Plan states that septic tanks cannot succeed at the Marion County Lake because the soil is too impermeable, soil cover is too shallow, and most of the lots are too small for adequate leach fields, and thus rejects this option.

5) Conventional Gravity Sewer System. The wastewater collection system selected in the Facility Plan as being the most cost-effective is the conventional gravity sewer system. In this alternative, wastewater would flow in eight-inch diameter sewer mains by gravity to a pumping station, where the wastewater would be pumped to the new Marion treatment plant. The costs of constructing a gravity sewer system at the Marion County Lake would be minimized by installing the lines only deep enough to serve the first floors of homes, and not to specifically serve any basements.

5. Facility Plan Proposed Project

The project determined to be the most cost-effective and environmentally sound by the Facility Plan is the regional plant concept, i.e., for the wastewater generated at the Marion County Lake to be collected by a gravity sewer system, and pumped to, and treated in, the City of Marion's proposed wastewater treatment facility.

The proposed gravity sewer system is designed for a 1995 projected population of 1,400 permanent residents. All development at the lake would be served by the proposed system. The collection system would encircle the lake, and consist of approximately 12,800 linear feet of eight-inch sewer pipe and 12,800 linear feet of small-diameter force main. An additional 6-inch PVC force main would convey the wastewater from the lake to a lift station south of the City in Marion's new system. Figure 5 shows the proposed system.

C. PURPOSES AND ISSUES OF THIS EIS

1. Legislative Background

The National Environmental Policy Act of 1969 (NEPA), Public Law 91-190, requires that all agencies of the Federal Government incorporate into their decision-making process careful consideration of the environmental effects of all proposed actions. In instances where these proposed actions could significantly affect the quality of the human environment, Section 102(2)(c) of NEPA requires that the agency prepare an environmental impact statement.

EPA performed an environmental review of the proposed project and determined that it could have significant effects on the environment in the Marion County Lake area. Therefore, on August 14, 1978, EPA issued a Notice of Intent to prepare an EIS. This EIS fulfills the requirements of NEPA, and has been prepared in accordance with the Council on Environmental Quality's Regulations dated November 29, 1978, and the subsequent EPA implementation regulations of June 18, 1979.

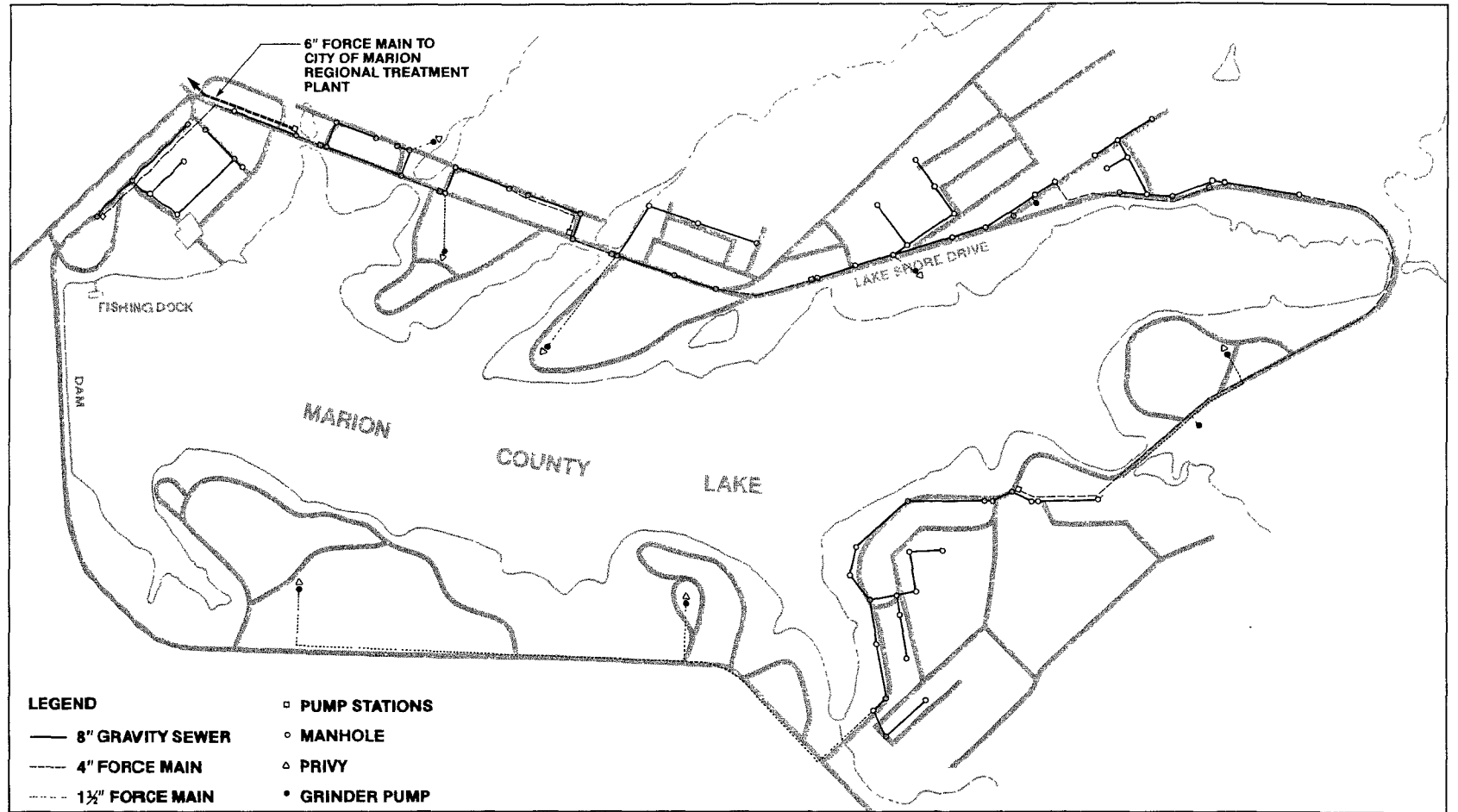
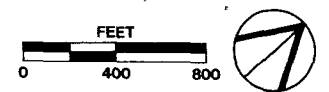


Figure 5
Facility Plan Proposed Project



2. Major Issues

The Notice of Intent identified several significant environmental issues associated with the proposed project. These issues, and others identified during the preparation of this EIS, are outlined briefly in the following sections.

a. Potential Secondary Development. The proposed project could encourage further residential development around the lake, and also along the force main corridor from the lake community collection area to the City of Marion treatment plant. The potential impacts of this growth on the lake as a recreational resource and on the native grassland habitats of the area were identified as major concerns, and are addressed in this EIS.

b. Water Quality and Public Health. The threats to lake water quality and public health posed by failing septic systems are the problems that prompted the initiation of the Marion County Lake sewerage project. The extent and severity of those problems are addressed in this EIS. The potential for additional adverse impacts on the water quality of the Cottonwood River, the stream proposed to receive the treated effluent, is also assessed, as is the possibility of destruction of habitat of the Neosho Madtom (Noturus placidus), a fish classified as an endangered species by the State of Kansas.

c. Archaeological Sites. Construction of the collection lines and force main could disrupt archaeological sites in the area, as could other development induced by the project. A cultural resources survey has been conducted as a part of this EIS to assess these possibilities.

d. Economic Impacts. The local share of the project construction costs and all of the system operation and maintenance costs must be borne by the residents of the service area, many of whom are retired on fixed incomes. Concern about the possible effects of this financial burden on the local residents prompted an examination of the cost effectiveness of the alternatives considered and the sizing of the proposed project. Estimates of present population and future projections have been evaluated as part of this effort.

II DEVELOPMENT OF ALTERNATIVES

A. INTRODUCTION

This chapter presents the rationale used in developing several additional project alternatives to be examined along with the Facility Plan proposed project. These new alternatives were developed to more directly address the major issues and to reflect the more detailed information made available by field investigations conducted for this EIS. In particular, this information concerned the extent of existing water quality problems and the estimates of present and future population used as a basis for system design.

During the preparation of the EIS, extensive tests were conducted to better define the water quality problems in the Marion County Lake area. These tests included water quality sampling in the lake and at many individual wells, infrared aerial photography to determine leach field failures, and septic leachate sampling in the lake. Results of these tests indicated that water quality problems were not as extensive as originally believed and that some smaller, more site-specific alternatives might provide adequate treatment and should be investigated in more detail.

Considerable data on present and projected population levels was also obtained. Sources of this information included County Assessor's records, electric service billings, park camping fee records, and field interviews with local officials. Analysis of this data indicated that revisions of the design population projections should be made, resulting in reduced project design sewage flows. These revisions prompted a re-analysis of several alternatives considered in the Facility Plan. The design parameters used in developing these alternatives are presented in the following section.

B. DESIGN PARAMETERS

1. Population Projections

The large seasonal variations in the number of people residing

in the Marion County Lake planning area make estimating the current and future populations more complex than is typically the case for a small rural community. Data gathered during the preparation of this EIS from a variety of local sources indicate that the lake population can be classified into several groups having relatively similar patterns of residence. Projections are developed for each of these groups and then added to obtain projections of the peak and average populations at the lake. A description of the methodology used in calculating these projections is presented in Appendix A.

a. Current Population Estimate. At present, the population consists of four major groups - permanent residents, seasonal residents, campers, and residents of the trailer park. The majority of the permanent residents are retirees, whereas more of the seasonal residents are families with children. Most of the groups camping at the lake and using the trailer park are also families with children.

The current average and peak day populations are listed in Tables 1 and 2. These estimates indicate that, over the course of an entire year, the population averages approximately 373 persons per day. On the busiest day of the year, such as the Fourth of July or Memorial Day, there are approximately 1600 people at the lake. These figures reflect the number of people who actually reside or camp at the lake overnight, and not those who come only for the day.

b. Population Projections. These projections assume that the growth trends established in the last decade will continue through the year 2000. The number of seasonal units will continue to decrease and the number of permanent units to increase as more people convert their seasonal homes to retirement homes. A summary of the projections of the permanent and seasonal populations is listed in Table 3. Projections of the number of campers are based on the expected population increases in the Wichita SMSA.

TABLE 1
CURRENT POPULATION ESTIMATE
AVERAGE DAY

Group	Units	Persons per Unit	Population	Days/Yr.	Person- Days/Yr
Holiday Campers	300	3.50	1050	12	12,600
Weekend Campers	100	3.50	350	46	16,100
Seasonal-Summer	59	3.06	181	240	43,440
Seasonal-Weekend	40	3.06	122	48	5,856
Permanent Residents	67	2.13	143	365	52,195
Seasonal Trailers:					
(Summer Wkd.)	20	3.50	70	46	3,220
(Holiday Wkd.)	30	3.50	105	12	1,260
(Winter Wkd.)	10	2.50	25	52	1,300
Total Person-days/Yr.					135,971

Average Persons per Day 373

TABLE 2
CURRENT POPULATION ESTIMATE
PEAK DAY

Group	Units	Person per Unit	Population
Holiday Campers	300	3.50	1,050
Seasonal Residents	99	3.06	303
Permanent Residents	67	2.13	143
Seasonal Trailers	35	3.50	123
Peak Day Population			1,619

TABLE 3
PROJECTED PERMANENT AND SEASONAL POPULATION

<u>Year</u>	<u>Permanent</u>		<u>Seasonal</u>	
	<u>Units</u>	<u>Population</u>	<u>Units</u>	<u>Population</u>
1985	84	194	92	282
1990	100	230	84	257
1995	116	267	77	236
2000	132	303	69	211

Average day and peak day projections for the year 2000 are listed in Tables 4 and 5.

2. Design Flows

Based upon these new population projections, revised wastewater flows for the design year of 2000 were developed. These new design flows were used to size all of the new alternatives considered in this EIS in order to provide an equitable basis for comparison. Flow rates for each of the population categories are based upon EPA guidelines and discussions with the Facility Plan consultants. Tables 6 and 7 present the average day and peak day design wastewater flows and BOD loadings. The revised average day design flow shown in Table 6 is approximately 27 percent of the design flow originally used in the Facility Plan.

3. Effluent Limitations

The Marion County Lake Improvement District has three options for surface disposal of its treated wastewater. These include discharge into the Cottonwood River or one of its tributaries, into the County Lake, or by land application. Effluent limitations of the State of Kansas govern the degree of treatment that must be achieved for all such discharges.

All free-flowing streams in the Neosho River basin, including the Cottonwood River and its tributaries, are designated Class B waters. Lakes and reservoirs in the Neosho River basin are designated Class A waters. Class A waters are protected for body contact recreation;

TABLE 4
POPULATION PROJECTION
AVERAGE DAY POPULATION
YEAR 2000

Group	Units	Persons Per Unit	Population	Days/Yr.	Person- Days/Yr.
Holiday Campers	405	3.50	1,418	12	17,016
Weekend Campers	135	3.50	473	46	21,758
Seasonal-Summer	41	3.06	125	240	30,000
Seasonal-Weekend	28	3.06	86	48	4,128
Permanent Residents	132	2.29	302	365	110,230
Seasonal Trailers:					
(Summer Wkd.)	25	3.50	88	46	4,048
(Holiday Wkd.)	38	3.50	133	12	1,596
(Winter Wkd.)	13	2.50	33	52	1,716
Total Person-days per Year					190,492
Average Persons per Day		522			

TABLE 5
POPULATION PROJECTION
PEAK DAY
YEAR 2000

Group	Units	Person per Unit	Population
Holiday Campers	405	3.50	1418
Seasonal Residents	69	3.06	211
Permanent Residents	132	2.29	302
Seasonal Trailers	44	3.50	154
Peak Day Population			2085

TABLE 6
AVERAGE DAY DESIGN FLOW
YEAR 2000

<u>Population Category</u>	<u>Population</u>	<u>Days/Yr</u>	<u>Flow (gpcd)</u>	<u>BOD (lb/cap/day)</u>	<u>Total Flow (gpy)</u>	<u>Total BOD₅ (lb/yr)</u>
Permanent	302	365	65	0.17	7,165,000	18,700
Seasonal -						
Summer	125	240	50	0.17	1,500,000	5,100
Weekend	86	48	50	0.17	206,400	700
Trailers -						
Weekend	88	46	50	0.17	202,400	700
Holiday	133	12	50	0.17	79,800	300
Winter	33	52	50	0.17	85,800	300
Campers -						
Weekend	473	46	25	0.17	544,000	3,700
Holiday	1418	12	25	0.17	425,400	2,900
YEARLY TOTAL					10,208,800	32,400
DAILY AVERAGE					28,000 gpd	90 lb/day

TABLE 7
PEAK DAY DESIGN FLOW
YEAR 2000

<u>Population</u> <u>Category</u>	<u>Population</u>	<u>Flow</u> <u>(gpcd)</u>	<u>BOD</u> <u>(lb/cap/day)</u>	<u>Total Flow</u> <u>(gpd)</u>	<u>Total BOD₅</u> <u>(lb/day)</u>
Permanent	302	65	0.17	19,630	50
Seasonal	211	50	0.17	10,550	40
Trailers	154	25	0.17	3,850	30
Campers	1,418	25	0.17	35,450	240
<hr/>					
PEAK DAY					
TOTAL	2,085			69,500	360

propagation of warm freshwater aquatic and semi-aquatic biota, water fowl, and wildlife; public and industrial water supplies; and agricultural purposes. Class B waters are protected for the same uses as Class A waters, except that body contact recreation is downgraded to secondary contact recreation (9). Municipal wastewaters discharged to Class B waters, such as the Cottonwood River or its tributaries, must meet secondary treatment effluent standards of 30 mg/l BOD₅ and 30 mg/l TSS. Municipal discharges to Class A waters must be disinfected in addition to meeting those standards. This standard would apply for discharges to the Marion County Lake (8).

If the LID decided to dispose of its wastewater by land application a minimum of primary treatment would be required (19). Wastewater land application systems are classified in Kansas as either treatment oriented, with no direct point discharge to State waters, or irrigation oriented, with periodic point discharges to State waters. Any irrigation-oriented land treatment system must include secondary treatment before discharge. Disinfection is required for any land treatment system that discharges on land areas such as parks, athletic fields, or golf courses, where there is a probability of body contact. Subsurface treatment of wastewaters in septic tank leach fields is not governed by State regulations, although their design and construction is regulated by the Marion County Sanitary Code.

C. SYSTEM COMPONENTS

In developing or revising wastewater collection and treatment alternatives for the Marion County Lake planning area, consideration was given to the full range of technologies available for each part of the system. Separate alternatives were investigated for wastewater collection, wastewater treatment, effluent disposal, and sludge treatment and disposal. Discussions of the various technologies considered are presented in the following sections.

1. Collection Systems

In small or sparsely-populated communities, the cost of collecting wastewater for central treatment is frequently a major portion of the total cost of the treatment system. The choice of collection system for a centralized wastewater treatment system thus becomes an important part of the overall investigation.

a. Gravity Sewers. These are used in most wastewater collection systems because of their low operation and maintenance costs. In sparsely-populated, rocky, or hilly areas, however, gravity sewers are frequently not cost-effective.

b. Pressure Sewers. Pressure sewers use sealed, small-diameter pipelines buried just below the frost penetration depth. The system consists of a number of pressurizing inlet points, each of which serves one or more houses, and which join to a single outlet. The two major types of pressure sewer systems are the grinder pump (GP) system, in which grinder pumps are installed at each inlet point, and the septic tank effluent pumping (STEP) system, which utilizes the individual septic tanks for collection and primary treatment.

c. Vacuum Sewers. This alternative is dependent upon the maintenance of a vacuum in the collection lines. There is less uncertainty about the performance of the individual lines than for pressure sewers, because a central source controls the vacuum throughout the system. Water conservation is increased by the use of vacuum toilets. Vacuum sewers are more easily installed than are gravity sewers because of their smaller size and the shallower depths required. However, it is frequently difficult to maintain a vacuum as the lines age and deteriorate.

d. Holding Tanks. These are reinforced concrete, steel, or fiberglass tanks (1000-1500 gallons) installed in place of septic tanks. They collect and contain household wastes, but do not discharge an effluent, and thus must be periodically emptied. The septage removed is hauled to a nearby treatment plant by a large tank truck, or "honeywagon."

2. Wastewater Treatment

a. Centralized Treatment. In centralized treatment schemes, wastewater is collected and treated at one site. A number of treatment methods are available to communities with small wastewater flows. The method chosen depends upon the volume and characteristics of the wastewater, the construction and operating costs, the environmental consequences, and the ability to produce an effluent that meets state requirements. The site of any centralized wastewater treatment facility for the Marion County Lake depends primarily upon the effluent limitations at the expected discharge point and the availability of suitable land.

1) Wastewater Stabilization Ponds. These are defined as "shallow man-made basins utilizing natural processes under partially controlled conditions for the reduction of organic matter and the destruction of pathogenic organisms in wastewaters" (10). Stabilization ponds, or lagoons, are often used for secondary treatment in rural communities because of their low construction and operating costs (11). Lagoons can be classified as aerated, aerobic, or anaerobic. The type of lagoon used is selected based on such factors as the volume and characteristics of the wastewaters and the degree of treatment required.

a) Aerated Lagoons. Kansas regulations define two types of aerated lagoons, facultative and complete-mix. In facultative aerated ponds, some solids are deposited due to incomplete mixing. Anaerobic decomposition then occurs at the bottom of the lagoon, and the by-products subsequently decompose aerobically in the upper layers of the sludge blanket. Facultative ponds are between 5 and 12 feet deep. In complete-mix aerated lagoons, typically 10-12 feet deep, sufficient aeration is provided to maintain the suspension of all solids and uniform oxygen dispersion, resulting in completely aerobic decomposition of all solids (5, 10).

b) Aerobic Lagoons. This type of lagoon is oxygenated solely by algal photosynthesis and wind action across the surface of a relatively shallow pond. Kansas regulations distinguish three types of aerobic lagoons: non-overflowing or evaporative ponds; discharging

ponds; and controlled discharge ponds. A non-overflowing pond depends upon evaporation and water loss through the pond sides and bottom to dispose of the wastewater. A controlled discharge pond treats and stores wastewater for discharge during times when the receiving stream is best able to assimilate the effluent. Discharging ponds continuously release treated effluent to a receiving stream. Aerobic lagoon systems typically consist of two or more suitably-sized ponds, each of which is up to 5 feet deep, except for the final pond, which may be deeper (10).

c) Anaerobic Lagoons. This type of waste stabilization pond is normally used for the treatment of highly-organic industrial wastes, such as from meat packing plants. Kansas regulations do not permit anaerobic lagoons to be used as municipal treatment facilities (10) because adequate treatment usually requires a surface layer of grease, which is not provided by most municipal wastewaters (12).

2) Trickling Filters. This aerobic, attached-growth biological treatment method consists of a bed of highly permeable media (usually rocks) on which microorganisms become attached, and through which wastewater is percolated or trickled. Trickling filters are the most common of the attached-growth treatment methods. They are particularly advantageous for small communities because of their ease of operation, low cost, and ability to accept shock loads. Trickling filters are classified, based on hydraulic and biological loading, as either high rate, which are used prior to further biological treatment, or standard rate. New trickling filter systems are usually preceded by primary settling and followed by clarification. Single-stage rock-media trickling filters, by themselves, are not allowed for new wastewater treatment facilities because they cannot meet the secondary treatment effluent limitations of 30 mg/l BOD₅ and 30 mg/l TSS without additional treatment (13).

3) Activated Sludge Plants. This treatment process consists of suspending aerobic micro-organisms in wastewater that is then aerated and mixed. The activated sludge process is influenced by many factors, which makes it among the most difficult and expensive treatment

processes to operate properly (13). It is intended primarily for treatment of large waste flows, but has been modified for small communities. Many of these modifications are commercially available as "package plants," which are pre-engineered and easily assembled from standard components.

An oxidation ditch is a modification of the activated sludge process that is particularly suitable for small communities. An oxidation ditch consists of a continuous channel through which the wastewater is circulated, while being agitated by surface aerators. Most facilities using this process omit primary sedimentation, but include clarification following the oxidation ditch.

b. Decentralized Treatment. Wastewater is treated as close to the individual sources as feasible in decentralized treatment. The most common method is the septic tank and soil absorption system, but a number of other systems have been developed. A community decentralized treatment system consists of any combination of the many types of on-site systems, which may be clustered or individual. These individual or clustered systems may be managed in several ways.

1) Engineering Alternatives

a) Conventional Septic Tank - Soil Absorption System.

The conventional septic tank is a large (750-1000 gallon) underground tank into which wastewater is discharged. Dense solids settle to the bottom of the tank, and grease and oil float to the top. The settled solids decompose anaerobically to some extent, and are periodically removed. The septic tank effluent flows into the soil absorption system, also called a lateral field, or a leach field. Further decomposition takes place as effluent percolates through the soil. Failures of conventional systems are more often caused by poor installation and maintenance than by the complete unsuitability of septic tanks for the area. Modifications can be made in some cases to improve the performance of on-site systems in areas where conventional septic tanks have not been successful.

b) Mound Systems. In areas that have shallow bedrock, or high groundwater, or permeability rates that are either too high or

too low, the soil absorption system may be modified to a mound system. This is accomplished by building the lateral field in a mound of medium sand and topsoil on top of the existing ground. This allows the septic tank effluent to be spread over a large area above the indigenous soils and groundwater.

c) Dual Field Systems. Designing a septic tank - soil absorption system to include two leach fields allows one field to "rest" while the other is receiving the septic tank effluent. Resting an absorption field for 6 to 12 months allows the ground to drain and air to reenter the spaces between soil particles, which removes clogging materials by physical and biochemical means. An alternating valve directs flow from the septic tank to one of the dual fields. If suitable land is available, newly installed or upgraded septic tank systems will be better able to handle waste flows if they include dual absorption fields.

d) Dosing Systems. These systems were developed to increase the life of the absorption field and decrease the land requirements. Studies have shown that periodic, rather than continuous, dosing increases leach field life by preventing anaerobic conditions from occurring. A pump or siphon installed between the septic tank and leach field doses the field 1 to 4 times daily, ensuring uniform distribution of the effluent and reducing soil clogging. Dosing systems are particularly advantageous for leach fields in coarse-grained soils, where uniform distribution of the septic tank effluent may be difficult (14).

e) Aerobic Systems. Wastewater treated under aerobic, rather than anaerobic, conditions produces a much more biologically stabilized effluent. An aerated, or aerobic, unit is an underground system with an initial settling chamber (as in a conventional septic tank), an aerated chamber, and a final settling chamber. Aerated systems produce an effluent that may be discharged to surface waters if disinfection, and possibly some additional treatment, are added. The disadvantages of these systems for small communities include high initial costs, the higher costs of the energy-intensive operation, and the more elaborate regular maintenance required.

f) Sand Filtration. Several types of filters, in conjunction with other systems, may produce effluent of high enough quality to be discharged to surface waters. The three types of sand filters used in the treatment of small wastewater flows are intermittent sand filters, subsurface (or buried) sand filters, and recirculating sand filters. Intermittent sand filters have pretreated wastewater (from a septic tank) spread over a 2-3 ft deep bed of sand. The effluent is collected for further treatment before discharge. Buried sand filters are constructed below the ground, and are periodically flooded with pretreated wastewater (septic tank effluent) at approximately 1 gal/day/ft². The effluent is collected for further treatment (15,16). Recirculating sand filters consist of a recirculation tank and a coarse sand filter. The septic tank effluent is pumped through the filter, collected, and returned to the tank. Wastewater is recycled through the filter at a recommended ratio of 4:1 (recycle:forward flow). Filtered effluent is discharged when the tank becomes full.

g) Evapotranspiration Systems. These systems are recommended for those areas where poor soil conditions prevent the use of soil absorption systems, and where annual evaporation substantially exceeds annual precipitation. The wastewater is eliminated by evaporation and plant transpiration. The system consists of a bed of sand, from 1-1/2 to 3 feet thick, connected to a septic tank. Many evapotranspiration systems overflow seasonally because of poor design or construction, particularly of the liner. The only operation and maintenance required is that associated with the septic tank.

2) Management Alternatives. The ability of any decentralized wastewater treatment system to operate properly depends primarily upon how well the individual on-site systems are maintained. There are several options than can be taken by a community setting up a decentralized system management program. The managment method chosen depends upon such factors as the soundness of the present on-site systems and the ability and willingness of the existing political structure to administer such a program.

The basic components of a decentralized system management program are planning, site evaluation, system design, installation supervision, operation, maintenance, financing, water quality monitoring, system inspection, public education, and environmental/public service program coordination (17). Planning involves evaluating the overall suitability of the community for soil absorption systems and deciding which areas in the community may use septic tanks. System design involves specifying the size and type of on-site system to be used, based on a site evaluation performed by qualified personnel. Construction supervision involves inspection of all new systems, and licensing all septic tank installers. Maintenance of the systems is extremely important, but is usually unenforced, and subsequently inadequate. The regulating authority must be empowered to enter private property to inspect systems, and to maintain those that are not operating properly. These duties may be funded by selling permits to each septic tank owner and requiring proof of routine maintenance and inspection before renewal, or by a general user fee levy. Monitoring of surface and groundwater is needed to review the overall success of the program. Finally, the public must understand their part as individual owners in the management program.

3. Effluent Disposal

Marion County Lake's wastewater may be treated at any of several sites. The choice of site depends upon soil and groundwater conditions, the flow and quality of the receiving water, and the ability of the site's ecosystem to accept the discharge.

a. Discharge to the Marion County Lake. The Marion County Lake is relatively low in suspended solids (18) and high in dissolved oxygen compared to neighboring lakes. Most Kansas lakes have enough nutrients (nitrates and phosphates) to support large algal populations, but are limited by high suspended solids concentrations (causing low light penetration) from becoming eutrophic (19). The Marion County Lake has localized algal blooms, especially in the stagnant coves, which is not unusual for old impoundments (20). The sanitary quality

of the lake is apparently good, as there have been no recorded violations of the lake's Class A fecal coliform standard (200 organisms/100 ml) (9).

The Marion County Lake is fed by springs and by runoff from pastures used for cattle grazing. The latter is likely the major source of nutrients, bacteria, and organics to the lake.

b. Discharge to the Stream Below the Marion County Lake. There are no available water quality or flow data for the unnamed stream below the Marion County Lake dam. The stream is fed by a number of springs in addition to overflows and seepage from the dam, and does not go dry during the year. Except in stagnant coves and the area just below the dam, the quality of the stream appears to be as good as most spring-fed streams. Runoff accounts for relatively little of the total stream flow (21).

c. Discharge to the Cottonwood River. Limited data characterize the Cottonwood River as similar to the majority of Kansas surface waters, in that it is highly turbid, moderately mineralized, well buffered, well oxygenated, and with low organic loading, and high nutrient and bacterial levels (22). Kansas water quality is highly dependent upon flow, with high flows resulting in the poorest water quality. This is because the impact on water quality from non-point pollutants is substantially greater than that of pollutants from point sources, because of the sparse population in the area and the relatively high number of cattle. High amounts of fecal and total coliform and fecal streptococcus bacteria, suspended solids, and nutrients are evident, particularly during high flows (19). Violations of the river's Class B fecal coliform standard (2,000 organisms/ 100 ml) have been measured in the Cottonwood River downstream of the Marion Reservoir and County Lake (9, 23), and are most likely the result of contributions from non-point sources (including septic tanks) during storms.

The Cottonwood River is west of the study area, and southwest of the City of Marion. Mud Creek and Clear Creek join north of Marion and flow through the city to join the Cottonwood. The South Fork and North Fork of the Cottonwood River join three miles west of Marion.

The North Fork has been dammed by the Corps of Engineers to form the Marion Reservoir. The average flow rate of the Cottonwood River at the USGS sampling point just downstream of the Marion Reservoir over a 9-year period was 87.5 cfs (24).

d. Land Application. In this alternative, treated effluent would be sprayed upon a large tract of land near the lake. The irrigated fields could be used for a golf course, pasture, cropland, athletic fields, or a park. Kansas regulations require treatment before land application. The minimum treatment required depends upon the intended use of the irrigated land (See Section XIII of reference 10).

e. Total Retention. This alternative relies primarily upon evaporation in addition to transpiration by plants to dispose of the wastewater. For a total retention system where soils are highly permeable, the lagoons must be lined to prevent pollution of the groundwater.

4. Septage Handling

The wastes pumped from septic tanks are termed septage, and can be very difficult to treat. Septage is anaerobic, highly variable, odorous, high in organics and solids, and can severely disrupt a small wastewater treatment plant. Communities using septic tanks for treatment must plan for the treatment of septage, which usually must be aerated or otherwise pretreated before final disposal.

The relatively small volume of septage from the Marion County Lake community is discharged directly into the Marion lagoons without pretreatment. If the volume of septage increases appreciably, it may become necessary to discharge the LID's septage into a holding tank or equalization basin at the new Marion oxidation ditch treatment plant to avoid shock loading that would disrupt the treatment process.

D. CRITERIA FOR EVALUATION

To develop revised project alternatives that more directly address the concerns of this EIS, the various system components presented in the previous section were evaluated with respect to the particular

conditions in the Marion County Lake planning area. The purpose of this evaluation was to screen out those alternatives which clearly offered fewer advantages than the Facility Plan proposed project. Those alternatives which had the potential to satisfy the evaluation criteria were selected for further detailed analysis in this EIS. The principal criteria used in assessing the potential of the various system components are presented in the following sections.

1. Technical Feasibility

This criterion is an evaluation of the applicability of a particular component to the situation at Marion County Lake and of its ability to solve the area's water quality problems. This criterion became a significant factor in considering septic tank soil absorption field systems. With the exception of the soils immediately below the dam, all of the soils in the entire planning area are rated as having severe limitations for use as septic tank leach fields. (See Figure 5). This rating was due primarily to the very low permeability of the soils and the shallow depth to bedrock. Because of these soil conditions, conventional soil absorption systems were judged to be infeasible, and therefore were not considered in the detailed analysis of alternatives presented in this EIS.

2. Cost Effectiveness

As mandated in the federal regulations governing municipal sewage facility grants, cost-effectiveness must be a major criterion in selection of the proposed project. With limited exceptions for innovative treatment systems, or where there is an overriding environmental concern, EPA must fund the most cost-effective alternative.

Initial screening of the collection and treatment system components eliminated a number of alternatives from detailed analysis. The Facility Plan evaluations of small-diameter pressure and vacuum collection systems were reviewed under the new design parameters, but remained less cost-effective than the proposed gravity collection system. They were therefore not considered as components for the

alternatives analyzed in detail. Likewise, aerated lagoons were not analyzed in detail in this EIS because preliminary calculations showed them to still be less cost-effective than other treatment methods considered.

3. Environmental Impact

The consideration of the environmental impact of the various system components also played a role in the selection of the alternatives examined in this EIS. Discharge of treated effluent into the Marion County Lake was eliminated from consideration because of environmental concerns. Although the Kansas Department of Health and Environment regulations would permit discharge to the lake with secondary treatment and disinfection, the addition of such effluent would degrade the existing lake water quality and eventually lead to overenrichment.

III ALTERNATIVES

This chapter presents the specific project alternatives examined in this EIS. These alternatives are based upon the design parameters developed in the previous chapter, and seek to more adequately address the major issues identified in Chapter I. In addition to the No-Action alternative and the Facility Plan Proposed Project, two alternatives are presented which were considered in the Facility Plan, but which are re-evaluated in light of the revised design population projections. Also considered is a more limited alternative that deals only with the particular water quality problems identified in the field surveys conducted as a part of this study.

A number of other possible alternatives were also screened. These included pressure sewer and vacuum sewer collection systems and community leach fields serving clusters of individual septic tanks. Preliminary analyses showed these alternatives to be infeasible and they were not considered further.

A. NO-ACTION

The No-Action alternative describes the situation that would occur if EPA elects not to fund any wastewater facilities. Since there are presently no point-source discharges, there would be no obligation under federal regulations for the community to construct sewerage facilities. The 1973 Marion County Sanitary Code would continue to apply to all new private sewage systems and to any existing systems that fail in the future. This would mean that any of the present septic tank systems failing in the future would either be repaired, or replaced by a holding tank. In either case, and also in the case of any new systems installed, all costs would be borne by the individual owner. The Marion County Health Department or the Lake Improvement District could institute more stringent controls over on-site sewerage systems to help improve their performance and reduce

potential threats to public health. These measures could include increased inspection and maintenance and water use reduction measures. Such additional efforts would possibly require additional manpower and funding for the Marion County Health Department. Holding tank pumping costs could be reduced by using septic tank leach fields for disposal of grey water and holding tanks for the black water wastes only. A dual system such as this would reduce both the hydraulic load on the leach field and the amount of waste discharged to the holding tank. Implementation of such a measure would have to be within the provisions of the County Sanitary Code.

B. FACILITY PLAN PROPOSED PROJECT

This alternative is the project recommended in the Facility Plan. It consists of a conventional gravity collection system serving all existing development in the Lake Improvement District and a force main to pump sewage to the new City of Marion treatment plant, shown on Figure 6. The systems would have sufficient capacity for ultimate development of the planning area. If selected, this alternative would qualify for 75 percent federal funding of the eligible construction costs, which would include a proportional share of the cost of the City of Marion treatment plant. Facilities included in this alternative are described in detail in Chapter I, Section B.

C. DOWN-SIZED FACILITY PLAN PROPOSED PROJECT

This alternative is identical to the previous one except that the project facilities have been reduced in size to reflect the revised population projections developed in this EIS. This will insure comparability with the other alternatives discussed. Changes from the project recommended in the Facility Plan would include reducing the size of the force main and pump stations transporting the wastewater to the City of Marion pump station, and reducing the required treatment

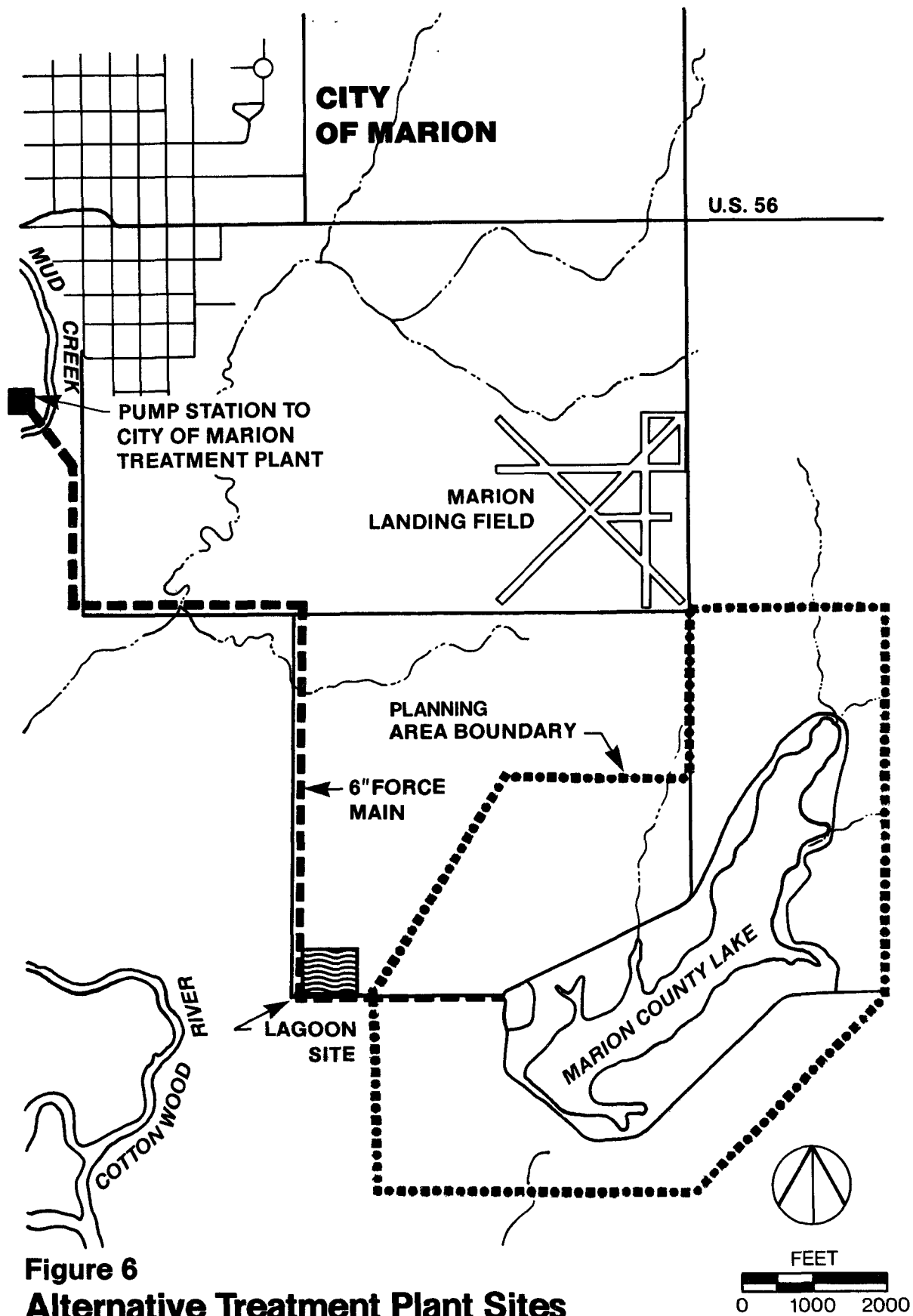


Figure 6
Alternative Treatment Plant Sites

capacity at the City of Marion plant. The gravity collection lines would remain the same capacity because they are already the minimum size generally allowed under Kansas design guidelines.

D. DOWN-SIZED TOTAL RETENTION LAGOONS

A conventional gravity collection system with treatment by total retention lagoons was considered and rejected in the Facility Plan because of the large land acquisition and excavation costs. Because of the significant reduction in total yearly wastewater flows due to the revised population projections, the total retention lagoon was reconsidered. Based upon the new design flows presented in Chapter II, a total area of 20 acres would be required for this new alternative. The lagoons would be located approximately 1/2 mile northwest of the dam, as shown on Figure 6. A gravity collection system serving the entire lake community would also be included, and would be identical to those of the previous two alternatives.

E. LIMITED PUBLIC ON-SITE SYSTEM

This alternative would involve the establishment of a special service agency to manage wastewater functions in the planning area. Such an agency would operate under the authority of the Lake Improvement District and the County Health Department, and would be responsible for the issuance of permits, inspection, operation, and maintenance of all on-site systems within the District. The first step in implementing this alternative, after forming the agency itself, would be to correct all identifiable sewerage problems. This action would consist of repairing septic tank systems where physically and economically feasible, and installing holding tanks where necessary. A pumping truck, to be owned and operated by the agency, would be provided to serve these and other holding tanks in the District.

Costs associated with the purchase of the truck and the resolution of all existing sewerage problems would be eligible for an 85 percent federal grant as an "alternative" wastewater treatment system, in accordance with 40 CFR Part 35, Subpart E, Section 35.908. Remaining capital costs, and all operation and maintenance costs, would be borne by the residents of the District. It is presently estimated that up to 5 holding tanks would have to be installed to alleviate present septic tank problems. Septage would be pumped from the holding tanks by the agency-owned pumping truck and would be discharged to the new City of Marion treatment plant. Separate black water/ grey water systems could also be installed in individual households to reduce holding tank pumping costs. These dual systems could only be installed on lots of sufficient size, and would be required to meet all provisions of the County Sanitary Code.

IV ENVIRONMENTAL CONSEQUENCES

A. WATER QUALITY AND PUBLIC HEALTH

The Construction Grants program was initiated primarily to help local communities abate existing municipal sewerage problems. For this reason, the extent of present water quality and public health problems, and the future impacts of each of the alternatives on these parameters, are major concerns of this EIS.

1. Present Conditions

To establish a baseline for projections of future water quality in the Marion County Lake planning area, EPA conducted extensive field investigations. These investigations included testing water samples from numerous public and private wells and from the lake, a septic leachate survey of the entire lakeshore, and an infrared aerial survey of the planning area to detect failing septic tank leach fields. A geologic investigation of the Marion County Lake area was also conducted to determine the potential relationships between groundwater quality and lake water quality.

a. Water Sampling. On three separate occasions between July and September of 1979, EPA collected and analyzed water samples from the lake area. These included samples from 76 private residences, 3 wells on county park land, and 3 locations in the lake, as shown on Figure 7. The first set of 15 samples were tested for total coliforms only, while the remaining samples were tested for total coliforms, fecal coliforms, and nitrates. The results of these tests are shown in Table 8.

The great majority of water samples analyzed contained very low concentrations of nitrates and fecal coliforms, which would not have been the case if there were contamination of the aquifer by septic tank effluent. Approximately 34 percent of the sites tested showed high concentrations of total coliforms. These can be caused

TABLE 8
EPA WELL WATER SAMPLING RESULTS

Parameter	Concentration	Number of Samples
Total	Less than 1 per 100 milliliters ^a	39
Coliforms	1 or more per 100 milliliters	21
	Too numerous to count	31
Fecal	less than 1 per 100 milliliters	70
Coliforms	1 or more per 100 milliliters	4
Nitrates	Less than 10 milligrams per liter ^b	76
	Greater than 10 milligrams per liter	1

^a Concentrations are shown as colonies per 100 milliliters as determined by the membrane filter test. The national drinking water standard for total coliforms in samples examined by this method is: one per 100 milliliters as the arithmetic mean of all samples examined per month; and four per 100 milliliters in more than one sample when less than 20 are examined per month, or four per 100 milliliters in more than five percent of the samples when 20 or more are examined per month.

^b 10 milligrams per liter is the maximum Nitrate level allowed by EPA primary drinking water regulations for community or non-community water systems.

Note: The water sampling tests presented in this table were performed by EPA personnel on July 18, 1979, September 4, 1979, and September 28, 1979. Not all tests were performed for each sample.

simply by contact with soils, and since the corresponding readings for fecal coliforms and nitrates were generally low, the high total coliform counts are most probably due to poorly sealed wells and deteriorating well casings.

b. Septic Leachate Survey. To locate and measure septic tank leachates entering the lake, EPA contracted with K-V Associates, Inc. to conduct a "septic snooper" survey of the entire lakeshore. The septic snooper device tests the conductivity and fluorescence of the lake water along the shore and, by comparing with known values for the conductivity and fluorescence of the organic matter and chloride ions in local sewage, is able to detect areas where insufficiently treated sewage is entering the lake. The septic leachate survey was conducted at the Marion County Lake on November 18-20, 1979, and detected only slight traces of organics entering the lake. Slightly higher readings were obtained in several of the small coves, but these were attributed to the decomposition of wind-blown leaves and run-off from upstream cattle-grazing areas and did not show the fluorescence characteristics of the local sewage. No indications of human waste were encountered, and the bacterial analysis of cove surface water samples revealed fecal coliform concentrations well below State Class A standards for recreational use. Appendix D contains the complete Septic Leachate Survey Report.

c. Infrared Aerial Survey. Aerial photographs of the entire Marion County Lake planning area were taken by EPA in October of 1979. These photos were taken through an infrared filter to detect slight differences in surface temperature. These temperature variations can be caused by differences in the density and lushness of vegetation, which can, in some instances, be due to enrichment of the soil by septic tank leachate. Over a period of time, the additional nutrients supplied by inadequately treated septic tank effluent will cause a richer vegetative growth along the leach field laterals, and this richer growth can be detected on the infrared aerial photos. This

enrichment can also eventually over-fertilize the vegetation, and cause burn-outs, which can also be detected from the aerial survey.

Using these photographic techniques, only three leach fields were identified as possibly failing. Two of these failures had already been detected through on-the-ground inspections by the County Health Department.

d. Geologic Investigation. To determine the potential for contamination of the local groundwater supplies by any possible pollution of surface waters, the geologic structure of the local aquifer was investigated. (See Appendix B). This investigation revealed that wells in the Marion County Lake area are drilled into the top strata of the Towanda Limestone, and that this aquifer is overlain by the Gage Shale member, which is approximately 45 feet thick. Because this shale is relatively impervious, the possibility of pollution of the aquifer from percolation from septic tank leach fields is unlikely.

The stream that was dammed to form the County Lake had eroded a portion of the Gage Shale, but the well and boring logs for the dam indicate that the Towanda Limestone lies at least 10 to 20 feet below the deepest portion of the lake (See Figure B-1 in Appendix B). It is quite unlikely, therefore, that any pollutants entering the lake could penetrate the remaining portion of the impervious Gage Shale and affect the quality of the aquifer.

The soils of the planning area were also examined for their suitability for septic tank leach fields. In almost all cases, soils in the area were found to have severe limitations for use as leach fields. These ratings are based on very shallow depth to bedrock over most of the area and relatively tight, impermeable soils. In spite of these soils limitations, there have not been a large number of leach field failures in the LID. It is believed that this can be attributed to the very low water usage in the community. Population studies found that there are considerably fewer people in residence on a day-to-day basis than previously thought, and it is likely that few of

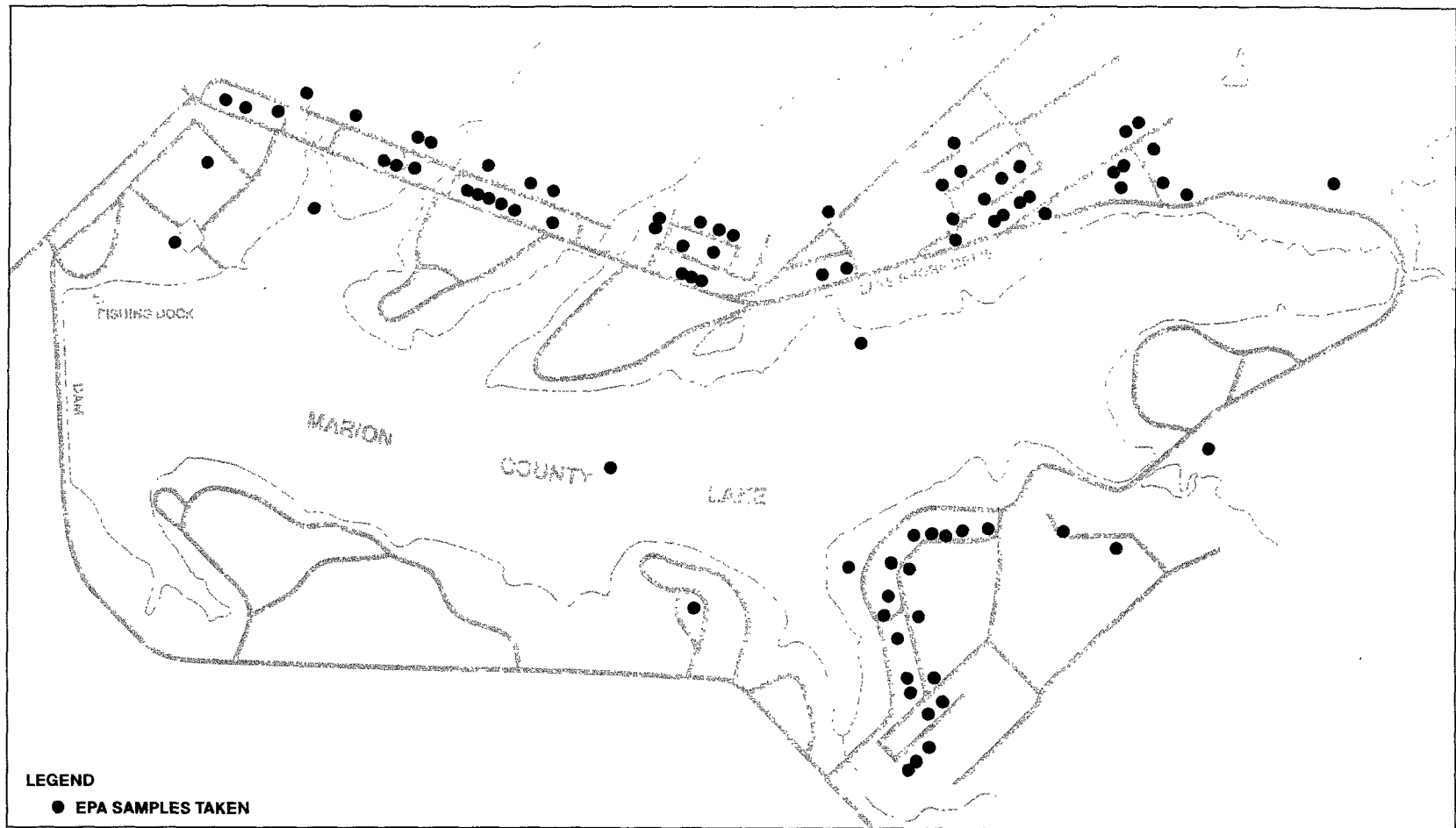


Figure 7
Water Quality Sampling Sites

the seasonal residents have many appliances that are large water users. The higher than normal proportion of elderly among the permanent residents probably also contributes to a low per-capita water use rate.

2. Impacts of the No-Action Alternative

If no federal grant is awarded, it is unlikely that any public sewerage facilities will be built. It is expected that the present County Sanitary Code will continue to be enforced, and that inspections of private systems by the County Health Department will continue. These inspections should detect most problems as the older septic systems fail. Repair of these systems, or replacement with holding tanks as has been occurring over the past several years, should avoid any serious water quality problems.

Future homes built in the District will be required to use holding tanks on lots of less than one acre. Any new septic systems installed will be on lots of one acre or more, ensuring sufficient room for a leach field of adequate size. In general, the inspection and repair of existing on-site systems and proper sizing of future systems should prevent the development of serious water quality problems at the Marion County Lake.

If sewage from the Marion County Lake is not pumped to the City of Marion treatment plant, there will be no additional adverse impacts to the Cottonwood River from discharge of that effluent. This would be a very minor impact in any case.

3. Impacts of Facility Plan Proposed Project or Down-sized Facility Plan Proposed Project

The implementation of either the Facility Plan Proposed Project or the Down-sized Facility Plan Proposed Project will result in the collection and treatment of all sewage generated in the area and will slightly improve water quality in the Marion County Lake. This improvement will come primarily from protection of the lake from future septic system failures, since there is no evidence that present water quality is being degraded. Either of these alternatives would

pump the Marion County Lake community's sewage to the proposed Marion City treatment plant, which plans to discharge the treated effluent into the Cottonwood River. Despite treatment before discharge, this addition to the treatment plant's effluent would inevitably degrade the water quality of the Cottonwood River to some small extent.

Construction of the collection system around the entire lake will result in some erosion and siltation in the lake, but this should be a relatively minor, short-term impact and can be reduced by good construction practices.

4. Impacts of Down-sized Total Retention Lagoons

As with the previous alternatives, all sewage from the lake area would be collected and treated outside the community, and therefore the lake water quality would be protected from future pollution from failure of the existing on-site systems. Since there would be no discharge of effluent with this alternative, there would be no adverse impacts to any receiving streams. Construction of the collection system would result in the same short-term erosion and sedimentation impacts mentioned previously. Also, construction of the lagoons on the 20-acre site will result in some erosion problems, although good construction practices should be able to contain most sediment on the site.

5. Impacts of Limited On-Site Public System

The impacts of this alternative would be nearly identical to those of the no-action alternative. The possibility of serious, long-term pollution from the failure of septic tank leach fields would be essentially eliminated by the proposed inspection program and enforced repair or replacement with holding tanks. Since most of the pollutants entering the lake originate from non-point sources, such as cattle-grazing pastures, there would be little improvement over the present water quality conditions. This alternative would, however, prevent any further deterioration of water quality. Since no collection or treatment facilities would be constructed under this alternative, there would be no erosion or sedimentation impacts.

B. POPULATION AND LAND USE IMPACTS

1. No Action Alternative

In general, the residential development of lake property has proceeded without the benefits of zoning, land use planning, or building codes. Prior to 1973, this resulted in the development of many small lots (some only 50' x 100'), each with its own well and septic tank leach field. The small lot sizes did not allow proper sizing of the leach fields or proper separation from water supply wells. Development at the lake ranges from small summer fishing cabins to substantial permanent homes. The extent of present development in the Lake Improvement District is shown on Figure 8.

The 1973 Marion County Sanitary Code has altered the pattern of development by requiring a minimum lot size of at least one acre if a septic tank system will be used. Since 1973, the subdivision of land has mainly been in one-acre lots, as in the Echo Lane subdivision. The pressure to develop lake property has not been great, as evidenced by the substantial number of vacant lots left in subdivisions which have been platted. For example, 39 of 40 platted one-acre lots in the Echo Lane subdivision (platted in 1976) are vacant and 32 of 40 lots are vacant in the Grandview Village subdivision (platted in 1973). Several lots in each subdivision have been purchased, but, as is characteristic of a recreation or retirement community, the property owners are waiting until they can afford to build either a summer home or a retirement home. It is probable that the lack of an adequate public sewerage system has played at least a small part in slowing the rate of development at the lake.

Other recent development has been on unplatted parcels of more than one acre in area, in the northern portion of the LID (NW¼ of Section 10). Several larger parcels (6-15 acres) have been purchased in this area but only one has been subdivided recently (October, 1979), and is now in the process of being platted (58).

If EPA determines not to fund any wastewater facilities, land development and population growth in the LID would continue essentially as it has since the enactment of the 1973 Marion County Sanitary Code. Population growth under these conditions would be expected to follow the projections presented in Chapter II.

2. Facility Plan Proposed Project

The major effect of this plan would be to create a substantial amount of sewerred, developable land within the Lake Improvement District. At present, subdivisions are grouped on the eastern and western shores, with large continuous vacant tracts of land north, northwest and south of the lake. By installing a collection system around the lake with sufficient capacity to serve the ultimate population of the LID, a major impediment to development would be removed. In addition, the density at which development could occur on lake property would be greatly increased because the one acre lot size restriction would be removed. The availability of vacant sewerred land combined with the ability to develop this land at a high density would be economically more attractive to developers than the present situation. Thus, the implementation of this alternative would create the potential for increased residential development at the lake over and above the population growth projected for the LID in Chapter II. There are, of course, many other factors that affect the demand for residential development at the Lake, and the provision of sewerage facilities would play only a small part in this situation.

An increase in development would not necessarily be advantageous to the LID because of the lack of control over, and planning for, new development. Without adequate land use planning, zoning, or a building code, the LID cannot restrict the location, timing, or density of new subdivisions. Should a significant increase in residential development at the lake occur, it could have adverse impacts on the quality of the recreation environment and the general aesthetics of the lake area. Increases in population would lead to greater

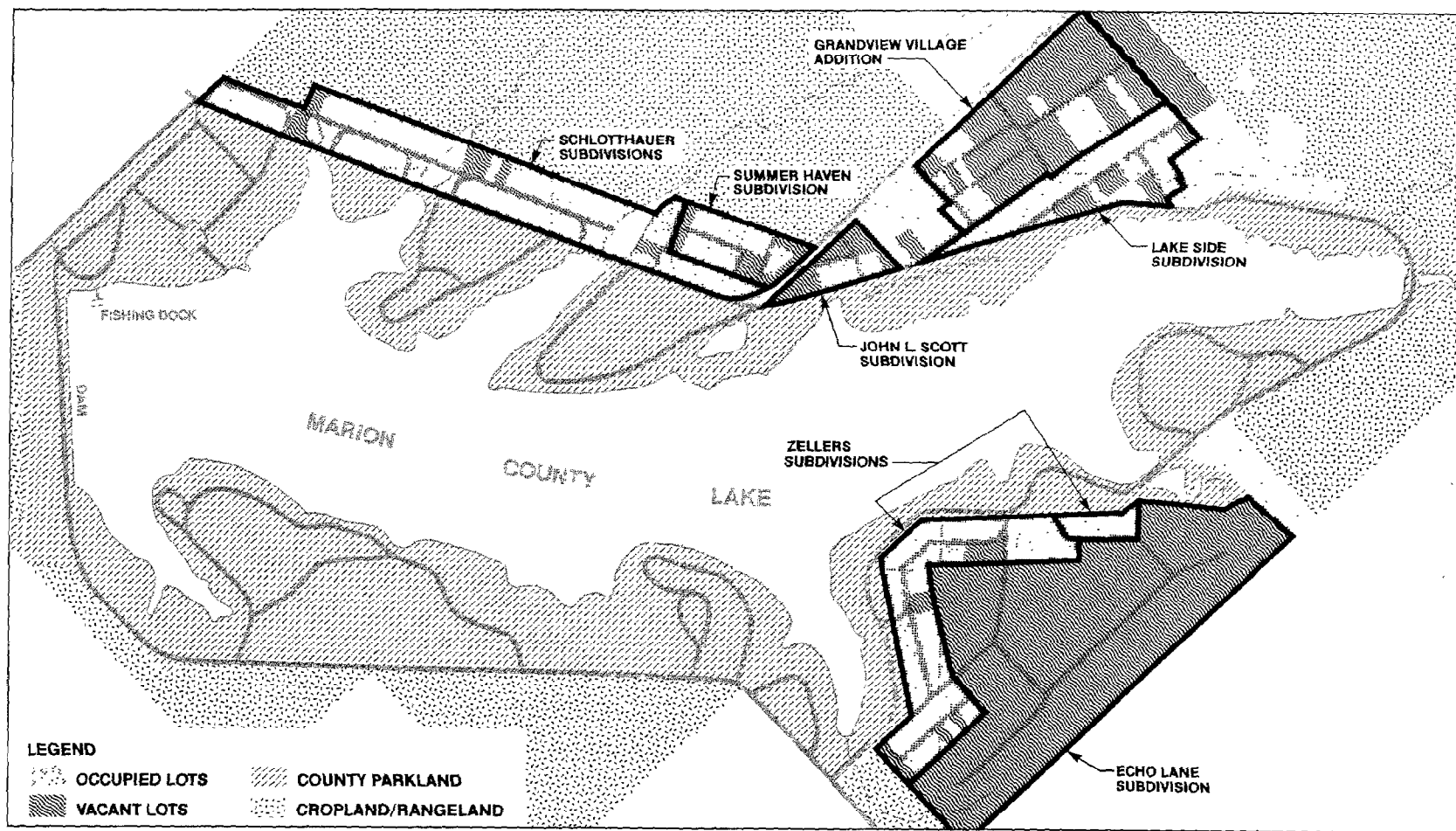


Figure 8
Present Land Use

traffic around the lake, more boating, and more pressure on the lake fishery. This level of development would also reduce the amount of open, undeveloped land which now contributes to the peaceful, rural atmosphere at the Marion County Lake.

3. Down-sized Facility Plan Proposed Project

The impacts associated with this alternative are essentially identical to those described for the Facility Plan proposed project. Although this alternative is a down-sized version of the Facility Plan proposed project, the actual physical size of the collection system would be exactly the same because the collection lines are already designed as small as State regulations will allow. The pump station for this alternative is smaller, but could be enlarged in the future without excessive cost or hardship, and the size of the force main is adequate to handle a substantial increase in flow. Therefore, this alternative's potential to induce growth would be identical to that of the previous alternative.

4. Down-sized Total Retention Lagoons

The impacts on population and land use at the lake that are associated with this alternative would also be primarily the same as those described for the Facility Plan proposed project because the size and extent of the collection system would be the same.

This alternative would require approximately 20 acres of land for the lagoon site. This land is presently used as crop land and would not be considered for other uses in the foreseeable future. The land is of little significance as wildlife habitat in its present state. There is only one residence within the vicinity of the lagoon site which would possibly be adversely affected by the presence of the lagoons.

5. Limited Public On-Site System

Since no collection system would be constructed for this alternative, and since all future development in the LID would be subject to the same restrictions as now exist for sewage facilities, this alternative would have essentially the same impact on land use and population growth as the no-action alternative.

C. COST-EFFECTIVENESS

The cost-effectiveness of each alternative is expressed here as the present value of total cost. Total cost includes all capital, operation and maintenance, administrative, and debt service costs throughout the planning period, less the salvage value of all items with a useful life remaining at the end of the 20-year planning period. No distinction is made here between public and private expenditures because the goal of cost-effective analysis is to determine the true social cost of each alternative--the total amount of resources required by each, which would therefore be unavailable for any other purpose.

Engineering and administrative costs are estimated to be 25% of capital costs, and cover design, construction supervision, legal fees, right-of-way acquisitions, and other administrative expenses. Items for which salvage values are deducted are land, structures, and facilities. Land is assumed to appreciate at a compound annual rate of 3%, while other components are depreciated using the straight-line method (26).

EPA cost-effectiveness guidelines require that each alternative under consideration provide an equivalent level of service. Then, the most cost-effective alternative is the one which achieves that level of service for the lowest present value. In practice, this theoretical requirement is often difficult to meet because of differences among alternatives in the number of persons served or the level of treatment provided. In this instance, all of the EIS alternatives have been sized for the same design year population, and will all provide sufficient protection of public health and lake water quality. These alternatives can therefore be considered comparable for the cost-effective analysis. The Facility Plan Proposed Project alternative was designed for a larger population and is not directly comparable.

TABLE 9
TECHNICAL ASSUMPTIONS OF THE COST-EFFECTIVE ANALYSIS

- ° All costs are expressed in 1979 dollars
- ° All unit costs are the most current for the Marion region
- ° Present value discount (interest) rate = 7 1/8%, as now required by the Water Resources Council
- ° Planning period = 20 years
- ° Life of facilities: land - permanent
structures - 50 years
mechanical components - 20 years
- ° Straight-line depreciation on structures and mechanical components, land appreciates at 3% compounded annually
- ° Land currently valued at \$750/acre (27)

TABLE 10
COST-EFFECTIVE ANALYSIS OF ALTERNATIVES

<u>Alternative</u>	<u>Total Present Value</u>
No Action	948,500
Facility Plan Proposed Project*	855,100
Down-Sized Facility Plan Proposed Project	824,300
Down-Sized Total Retention Lagoons	1,357,600
Limited Public On-Site Systems	897,000

*Costs of this alternative are not directly comparable since its design assumes a larger design population.

TABLE 11
COST-EFFECTIVE ANALYSIS SUMMARY

ALTERNATIVE		PRESENT VALUE*				Equivalent Annual Values
		Capital Costs	- Salvage Values	+ Total O&M Costs	= Total Present Values	
NO ACTION	Treatment	0	0	948,500	948,500	90,400
FACILITY PLAN PROPOSED PROJECT	Treatment	183,300	21,700	49,300	210,900	20,100
	Collection	646,200	54,500	52,500	644,200	61,400
	Total	829,500	76,200	101,800	855,100	81,500
DOWN-SIZED FACILITY PLAN PROPOSED PROJECT	Treatment	154,600	8,800	45,100	190,900	18,200
	Collection	599,900	19,000	52,500	633,400	60,400
	Total	754,500	27,800	97,600	824,300	78,600
DOWN-SIZED TOTAL RETENTION LAGOONS	Treatment	617,300	8,500	115,400	724,200	69,000
	Collection	599,900	19,000	52,500	633,400	60,400
	Total	1,217,200	27,500	167,900	1,357,600	129,400
LIMITED PUBLIC ON-SITE SYSTEMS	Treatment	241,300	16,200	671,900	897,000	85,500

*All figures rounded to nearest \$100.

Technical assumptions of the analysis are listed below in Table 9, and the results are presented in Table 10, which shows that the most cost-effective alternative is the Down-Sized Facility Plan Proposed Project. Although this alternative would involve the least social cost from an overall, national economic perspective, it may not necessarily be the least costly option for the local residents. Details of the cost-effective analysis are presented in Table 11. Background data on the development of the cost estimates for each alternative are presented in Appendix E.

D. LOCAL ECONOMIC IMPACTS

Investment in a wastewater treatment system at Marion County Lake will have short-term and long-term, and direct and indirect economic effects on the Lake Improvement District and its residents.

1. Short-Term Impacts

Minor short-term construction impacts in the form of jobs and incomes will be associated with alternatives 2, 3, and 4. Virtually all of these positive effects will fall outside of the LID, although some residents may be benefitted. The indirect benefits of increased sales by supporting industries would be realized by businesses outside of the LID, and increased tax revenues would be captured almost completely by the city and county governments. Construction of the collection system would produce a small adverse impact in the district if it disrupts camping, hunting, or fishing, and causes a loss of permit revenue.

2. Long-Term Impacts

Long-term economic impacts would be caused by the financial burden of funding the local share of project costs. The local share of costs is determined in accordance with EPA regulations which identify

items eligible for federal funding. In general, the eligible items are the capital cost of publicly owned treatment facilities and collection systems. Land costs are generally excluded, as is any portion of the treatment system that is judged to provide excess capacity. Annual operation and maintenance expenses are not eligible for federal funding (28). The local share of total project costs, therefore, includes all of the ineligible capital costs, the local share of the eligible capital costs, and all of the operation and maintenance costs. For those costs identified as eligible, EPA will fund 75% and the local government must provide the remaining 25%. To encourage the development and application of new approaches to wastewater treatment, the EPA will fund 85% of the capital costs of systems that it determines to be "innovative" or "alternative." The Limited Public On-Site System would qualify for increased federal funding as an "alternative" treatment system.

The total capital costs for each alternative, and the federal and local shares, are shown in Table 12. Annual debt service to finance the local share of capital costs was calculated by assuming that the local capital costs would be amortized over the 20 year planning period at 8.78%, the current (September 5, 1980) average rate for municipal bonds listed in U.S. Financial Data by the St. Louis Federal Reserve Bank. This debt service figure, the annual operation and maintenance cost, and the resulting total yearly cost to the LID of each alternative are listed in Table 13.

The cost of the system to each individual household was calculated by allocating portions of the debt service and the operation and maintenance costs to each property owner. The debt service costs were allocated in equal shares for each sewer connection provided. It is estimated that there would be a total of 230 connections; thus, the owner (either permanent or seasonal) of a single residence would pay one part in 230 of the total debt service, while Marion County would pay 64 shares of 230, one for each of the connections expected on county land in the trailer park and the camping areas. The operation

and maintenance costs were apportioned among all the users of the system based upon the amount of sewage they would be expected to produce. Users were divided into four groups: permanent residents, summer residents, weekend residents, and Marion County. The expected sewage volumes from each group were calculated using the following variables:

- estimated population (see Table 6 in Chapter II)
- assumed length of stay per year at the lake (see Table 6 in Chapter II)
- assumed per capita wastewater design flows (see Table 6 in Chapter II)

Marion County's wastewater volume is the sum of the flows from the county trailer park (56 units) and the 8 privies in the campgrounds. The resulting percentage distribution of the total flow volume was then applied to the total yearly O&M cost of each alternative to determine the O&M component of each user charge under each alternative. Thus seasonal residents would be charged less than year-round residents. Marion County would pay a rate based on all sewage flow expected from trailer occupants, campers, and picnickers. Table 14 presents an estimate of the total user charge per household for 1980 for each of the alternatives.

To evaluate the economic impact that user charges have on the residents of an area, the federal government has developed guidelines to identify sewerage projects likely to have significant adverse impacts on system users (29). These guidelines identify a project as high-cost when the average annual user charges are:

- 1.5% of the median household income in communities with median household incomes less than \$6,000
- 2.0% of community median household incomes between \$6,000 and \$10,000
- 2.5% of community median household incomes greater than \$10,000

Several methods of estimating the median household income of the LID place the median income in the \$10,000 to \$15,000 range. Therefore, if the actual median household income fell at the lower

**TABLE 12
CAPITAL COSTS**

<u>ALTERNATIVE</u>	<u>TOTAL COST</u>	<u>FEDERAL SHARE</u>	<u>LOCAL SHARE</u>
No Action	\$ 0	\$ 0	\$ 0
Facility Plan Proposed Project	829,500	570,225	259,275
Down-Sized Facility Plan Proposed Project	754,500	515,400	239,100
Down-Sized Total Retention Lagoon	1,217,200	851,175	366,025
Limited Public On-Site Systems	241,300	204,285	37,015

**TABLE 13
LOCAL COSTS - 1980**

<u>ALTERNATIVE</u>	<u>ANNUAL DEBT SERVICE*</u>	<u>ANNUAL OPERATION AND MAINTENANCE</u>	<u>TOTAL YEARLY COST</u>
No Action	\$ 0	\$ 31,500	\$ 31,500
Facility Plan Proposed Project	28,037	9,700	37,737
Down-Sized Facility Plan Proposed Project	25,880	9,300	35,180
Down-Sized Total Retention Lagoon	39,899	16,000	55,899
Limited Public On-Site Systems	4,313	26,200	30,513

*Based on local capital costs rounded up to the nearest ten thousand dollars to reflect bonding costs. Note that the Draft EIS contained an error in computation of the Annual Debt Service. This error has been corrected in the above table and a more current municipal bond interest rate has been used.

TABLE 14
ANNUAL USER CHARGES

<u>ALTERNATIVE</u>	<u>PERMANENT RESIDENTS</u>	<u>SEASONAL RESIDENTS</u>	<u>MARION COUNTY</u>
No Action	\$ 230 ^a	\$ 115 ^a	\$ 4,725 ^b
Facility Plan Proposed Project	190	157	9,449
Down-Sized Facility Plan Proposed Project	178	147	8,771
Down-Sized Total Retention Lagoon	290	259	13,502
Limited Public On-Site Systems	211	114	5,130

^a User charges for permanent and seasonal residents are presented on a per household basis.

^b User charges for Marion County include charges for all trailer hook-ups and all park facilities.

Note: The Draft EIS contained an error in computation of the Annual User Charges. The above table presents the corrected figures.

boundary of this range, a user charge of \$250 would represent a significant financial burden. Only the down-sized total retention lagoon alternative shows greater user charges than the \$250 benchmark figure if the median income is at the \$10,000 level. Thus, this alternative is considered "high cost" by the federal government criterion. If the median income within the district is actually greater than \$12,000, none of the alternatives could be considered to have significant adverse impacts on a community-wide basis. Since some lake residents are retirees and may be on fixed incomes, the user charge may have some economic impact on these particular households, but it should not be severe. It should be noted that the cost estimates for alternatives 1 and 5, which both include an increased use of holding tanks, are based upon the same sewage flow rates as the alternatives using conventional collection systems. This is done to provide a comparability in the level of treatment provided among the alternatives. In actual practice, those using holding tanks are generally much more conservative in their use of water, and therefore it is likely that a resident willing to practice such conservation could reduce his costs significantly below those shown for alternatives 1 and 5 in Table 14.

Another alternative for those required to convert from septic tank systems to holding tanks would be the installation of separate plumbing systems for grey water and black water. (Black water is defined as toilet waste only, whereas grey water includes wastewater from the laundry, shower, and sinks.) Black water would be discharged to a holding tank and pumped out for disposal at the Marion treatment plant. The grey water could be discharged to the existing septic tank leach field. This dual system would reduce the hydraulic load on the septic tank system and greatly decrease the number of pathogenic micro-organisms discharged to the leach fields. Since black water comprises only about 35 percent of the wastewater produced in a typical residence, this system would also significantly reduce the amount of wastewater that would be discharged to the holding tank, thereby reducing pump-out costs.

Several factors could have indirect long-term economic impacts on the LID. First, the financial burden of a user charge

could cause some amount of displacement if some lower-income households find the charge too costly and choose to move. Similarly, this extra cost could accelerate the trend of converting seasonal units to permanent units as some homeowners find it too expensive to maintain a second home at the lake. It is expected, however, that these effects would be very slight and would occur gradually over a long period of time.

As described in section B of this chapter, the increased development capacity of the LID resulting from a sewage collection system would allow more dense development. This could result in a range of economic impacts, including slightly increased LID revenues because of greater usage of the lake. In order to judge what is most likely to happen, an in-depth analysis of the markets for retirement homes and recreation activities in the region would be necessary.

E. ECOLOGICAL IMPACTS

1. No-Action Alternative

a. Terrestrial Flora. The no-action alternative will not modify the existing vegetation associations in the study area. Marion County is located within the bluestem prairie province of the tall-grass prairie ecoregion (31). The combination of edaphic and climatic conditions at one time supported a diverse grassland community. This community has since been altered by resource practices to the extent that natural grasslands now cover less than one percent of their original range. The project area reflects these conditions in as much as vestiges of native vegetation occur only in the northeast quarter of section 10 (R4E,T20S), along the creek that feeds Marion County Lake from the northeast and along the tailwaters below the dam.

The flora found in the northeast quarter of section 10 is a mixture of native tall-grass prairie species and introduced "weed" species. While it is suspected that this tract of land has not been plowed, the composition and diversity of the existing plant association

indicates a history of disturbance from the combined practices of overgrazing and haying. Woody riparian communities are found along the creek bottoms and tailwaters. They are predominately a cottonwood-elm-ash association with other common associates including black willow, mulberry, hackberry, honey locust and boxelder. This type of lowland plains woodland frequently occurs in the narrow belts along river valleys, side drainages and adjacent slopes in central and western Kansas (32).

The remaining native vegetation has been either modified by range management techniques or completely removed by agricultural, urban and other resource practices. An example of such manipulation is through the use of herbicides and fertilizers to selectively enhance certain rangeland species while eliminating others. The cultivation of alfalfa, milo, and winter wheat in the study area has permanently removed the prairie vegetation. Residential housing around the Lake is responsible for both the removal and alteration of the flora by the planting of ornamentals. Many of these introduced species, however, do provide wildlife with a supplementary food supply. Marion County Lake has also inundated acreage once covered by grasslands. Vegetation management practices around the Lake have resulted in a cottonwood parkland. The Lake, nevertheless, has increased the diversity of the fauna and flora in the area because of its availability as a water source in a relatively dry region.

Vegetation that was observed in the project area from October 3-5, 1979 is listed in Appendix C. This included 14 species of trees, 9 shrub and wood vine species, 35 taxa of herbs, and 8 plant taxa that were found growing either on the shoreline or in the Lake. While this inventory of woody and herbaceous autumn flora is by no means complete, it is believed that these species represent the great majority of autumn species.

Due to the time when the field investigation was made, it was not possible to observe and list spring herbaceous flora. Spring

species bloom and produce their seeds from late March through late June and then wither or become extremely inconspicuous. Spring flowering species would have at least doubled the vegetation list.

b. Terrestrial Fauna. The no-action alternative should not significantly alter the existing wildlife resources within the project area. Appendix C lists the fish and wildlife species that inhabit the vicinity. This alternative may indirectly benefit wildlife populations, since implementation of a sewage system may encourage development of additional residential area. Such development would subsequently destroy terrestrial wildlife habitat of native rangeland birds and small mammals.

c. Aquatic Flora. Macrophytes (rooted vegetation) are found in the coves and the perimeter of the Lake. These are sometimes suspected to be indicators of eutrophic conditions, but this assumption is not necessarily correct. Macrophytes commonly occur in small impoundments throughout Kansas where suitable habitat, reduced wave action, and warm waters provide optimal conditions for a stable flora (33). Algae (predominately Spirogyra) also were present, but not in the typical abundance of a eutrophic environment. The combined effects of the pondweeds and algae constitute a nuisance to fisherman along the shoreline during the summer and also promote the perpetuation of an overcrowded sunfish population. An attempt to alleviate this problem is being made by stocking grass carp (Ctenopharynodon idella), a species that consumes aquatic vegetation (34). Kansas Fish and Game also has suggested an autumn drawdown water level management plan to control the vegetation.

d. Aquatic Fauna. Field observations, conversations with county lake personnel (34), and available data from the Kansas Fish and Game fishery biologists (35, 36) indicate the water quality in Marion County Lake has not been significantly degraded and is capable of supporting a diverse fish fauna. Presently, black bass and introduced northern pike, species requiring clean, well-oxygenated water

are present in large numbers in the Lake. Other species that have been regularly stocked include channel catfish and walleye. No fish kills attributed to nutrient enrichment have been reported by the lake's superintendent or the Kansas Fish and Game Commission. It appears that with regular inspections and proper maintenance, there should be no adverse impact on the ecology of the Lake from continued operation of the existing septic tank systems.

2. Facility Plan Proposed Project

Implementation of the Facility Plan's concept of a collection system at Marion County Lake and pumping the raw sewage to the City of Marion's new treatment facility would have a minor temporary adverse impact on the terrestrial wildlife that inhabit the proposed force main's right-of-way during the construction period. The study area consists mostly of grazed rangeland and cultivated fields of milo and winter wheat. While rangeland provides the proper habitat for most grassland wildlife, farmland is of marginal value, furnishing cover during the growing season and a food source following harvest. The most optimal habitats occur in those areas adjacent to fence rows and between fields. The local wildlife populations should not be encumbered by the construction-related impacts.

There are no unique botanical areas, wetlands, or habitats of state or federal threatened or endangered species (35, 37, 38, 39) that will be affected by proposed project.

The Lake should not be adversely affected by such construction activities as trenching or filling operations. In the event a heavy rain follows trenching operations, the impoundment may suffer a temporary increase in turbidity from the erosion of loose soil. Since the magnitude of the project is small and the construction time-frame is short, the amount of erosion that could occur should not interfere with the ecology of the Lake.

Operational impacts from the additional design capacity load of about 0.105 mgd from Marion County Lake to the city of Marion's

treatment plant should be minimal. Marion's proposed treatment plant will be designed to treat 0.526 mgd of sewage and release an effluent of 30 mg/l BOD and 30 mg/l SS. Marion County Lakes's effluent will comprise about 20% of the total volume. If the plant is constructed at the proposed site, the effluent should maintain a constant flow in a presently intermittent tributary of the Cottonwood River, from the outfall site down to the River. It should be expected that this creek will not support a fish fauna and may occasionally create noxious conditions promoted by pools of standing effluent. Because of the dilution capacity of the Cottonwood River, the biota inhabiting the River should not be adversely effected by the effluent. A mixing zone formed at the confluence of the Cottonwood and the tributary should neither significantly disrupt fish movements nor drastically alter the benthic community (40). Beyond the mixing zone, there should be no perceptible long-term adverse impacts to the Cottonwood River. This includes any potential impacts to the Neosho Madtom (Noturus placidus), a state-classified endangered species, and its habitat. This species occurs about 70 miles downstream in the Cottonwood River below John Redmond Reservoir in Coffey County (35).

The secondary impacts of the Marion County Lake project would encourage development of additional residential areas. Such development would subsequently destroy wildlife habitat of native rangeland birds and small mammals.

The Kansas Fish and Game Commission has stated there are no endangered or threatened species known to inhabit the planning area. Migrating species may use the area sporadically; however, no impacts on them are expected.

3. Down-sized Facility Plan Proposed Project

The ecological impacts associated with this alternative would essentially be identical to those discussed in the Facility Plan Proposed Project, except that the total amount of sewage to be treated is estimated to be only 27 percent of the previous design volume.

4. Down-sized Total Retention Lagoons

Lagoon treatment and zero discharge would require the acquisition of about 20 acres of land to retain the effluent. The severity of the long-term adverse impact would be dependent on the location of the lagoon. Since the proposed site is primarily rangeland, the impact to the wildlife by the loss of 20 acres should be minimal. A total retention lagoon system would avoid any of the adverse effects on receiving streams that accompany discharging systems.

5. Limited Public On-site System

Properly operating individual septic systems or holding tanks should have no adverse impact on the ecology of the project area. No wildlife habitat would be destroyed, as all construction would take place on existing residential lots.

F. CULTURAL RESOURCES

A cultural resources reconnaissance survey of the Marion County Lake Improvement District was conducted to identify any archaeological or historic sites that might be adversely affected by the sewerage facility alternatives being considered. This survey was conducted during the summer and fall of 1979 by the Archaeology Laboratory, Wichita State University, under the direction of Dr. Arthur H. Rohn, Principal Investigator.

The investigation included archival searches, informant interviews, and pedestrian surveys of all areas that could be affected by construction of any of the project alternatives. Two small archaeological sites were recorded, neither of which appear to meet the criteria for inclusion on the National Register of Historic Places. These two sites are shown as sites 531 and 532 on Figure 9. (This figure also shows the areas that were investigated in the pedestrian field survey.) No cultural resources were found in any of the force main or interceptor corridors.

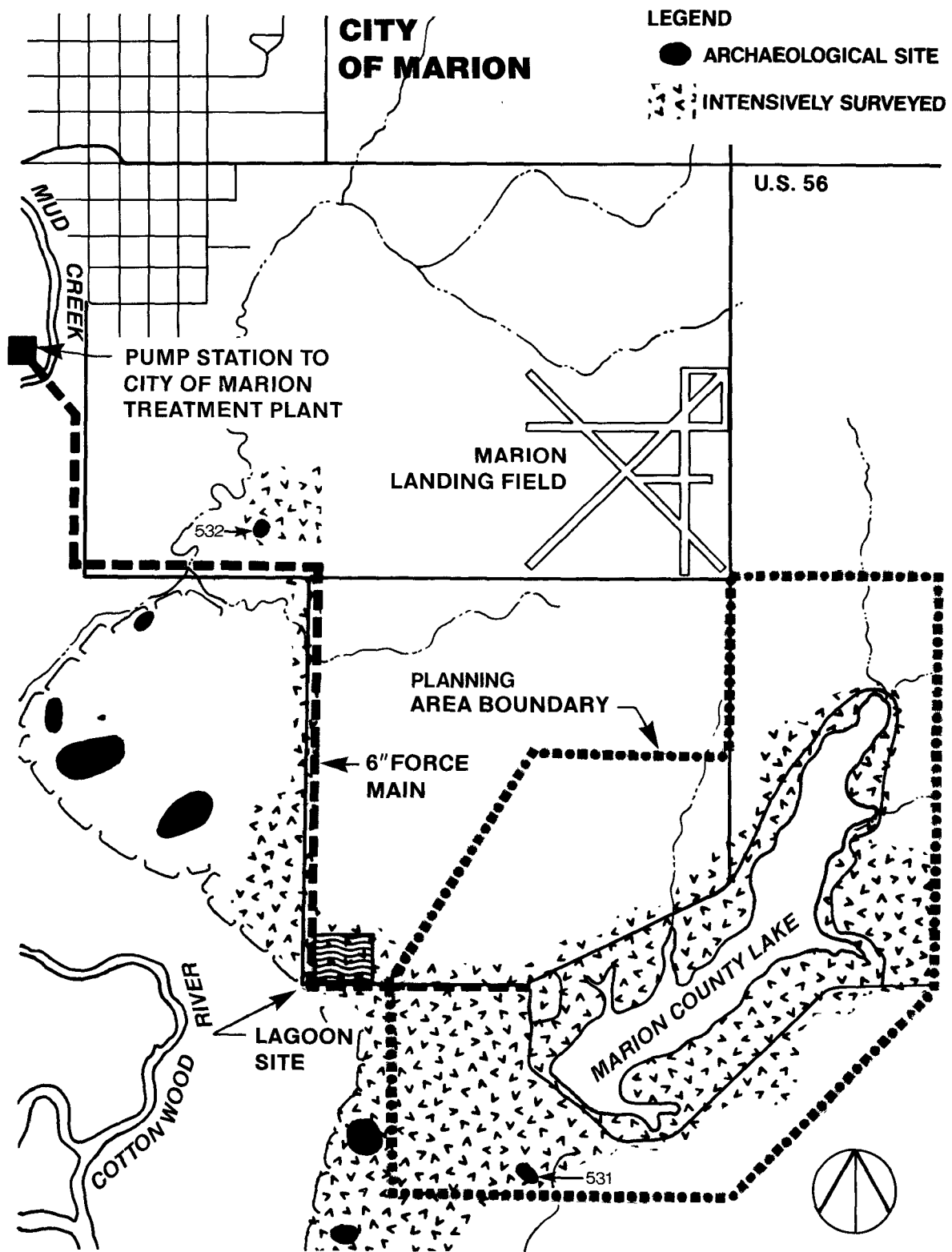


Figure 9
Cultural Resources Reconnaissance Survey

Since the new City of Marion treatment plant is now proposed to be located northwest of the city, there would be no impact expected on site 532. The site appears to be relatively insignificant and no cultural affiliation could be determined for it. Site 531 is located below the Marion County Lake dam and would not be affected by any of the alternatives under consideration. The site appears to represent a pre-Great Bend culture.

The Gee House, a historic house located on Lake Shore Drive, was built in 1877. Because of numerous alterations to the structure, it does not appear to meet the criteria for nomination to the National Register of Historic Places. In any event, none of the alternatives would adversely affect the house.

The Marion County Lake Park represents a fine example of the small scale projects sponsored by President Franklin Roosevelt's New Deal administration in an attempt to counter the Great Depression of the 1930's. However, because it is not sufficiently old, the park does not meet the criteria for designation as a federal, state, or local landmark. Should the present facilities survive another ten years, the lake and park should be reconsidered for landmark status. None of the sewerage alternatives should have direct adverse impacts on the park facilities.

G. SUMMARY OF IMPACTS

Table 15 summarizes the principal impacts that would occur with each of the alternatives. The numbered alternatives presented in the table are defined as follows:

1. No Action
2. Facility Plan Proposed Project
3. Down-sized Facility Plan Proposed Project
4. Down-sized Total Retention Lagoon
5. Limited Public On-Site Systems

Detailed descriptions of these alternatives are presented in Chapter III.

TABLE 15
IMPACT SUMMARY

IMPACT CATEGORY	ALTERNATIVE	IMPACT DESCRIPTION
Lake Water Quality	1, 5	No anticipated impact.
	2, 3, 4	Very minor short-term erosion from construction of collection system.
Stream Water Quality	1, 5	.009 mgd addition to Marion treatment plant effluent discharged to Cottonwood River. Negligible impact.
	2, 3	.028 mgd addition to Marion plant effluent. Negligible impact. Very minor short-term erosion from construction of force main.
	4	No discharge of effluent. Very minor short-term erosion from construction of force main and lagoon.
Groundwater Quality	All	The relatively impervious Gage shale overlying the aquifer prevents pollution of groundwater.
Residential Development	1, 5	All new development must either be on one acre lots or have holding tanks. Provide no new incentives for development.

TABLE 15 (Cont.)
IMPACT SUMMARY

IMPACT CATEGORY	ALTERNATIVE	IMPACT DESCRIPTION
Residential Development	2, 3, 4	Collection system serving the entire lake area could make development more economically attractive. Would allow an increase in density since no limit on lot size would be required. Any growth induced would have minor secondary impacts on open land, noise, traffic, recreation; but growth rate is not expected to vary significantly whether sewers are built or not, since other factors exert more control.
Prime Farmland	1, 5	Should cause no conversion of prime farmlands to other uses.
	2, 3, 4	Potential for induced residential growth could affect a small amount of farmland.
	4 only	Lagoon construction will require 20 acres of prime farmland presently used for grazing.
Cost-Effectiveness		The Down-sized Facility Plant Proposed Project (Alternative 3) was found to be the most cost-effective. The Down-sized Total Retention Lagoon (Alternative 4) was found to be the least cost-effective.
Local User Cost	All	None of the alternatives would place a significant financial burden on the community in general. Any of them, however, may involve some significant impact on lower-income residents.

TABLE 15 (Cont.)
IMPACT SUMMARY

IMPACT CATEGORY	ALTERNATIVE	IMPACT DESCRIPTION
Threatened or Endangered Species	All	There should be no impacts on threatened or endangered species or their habitat.
Aquatic Environment	1, 4, 5	Should have no adverse impacts on aquatic species or habitats.
	2, 3	Nearly negligible impact on species in Cottonwood River by increase in City of Marion plant effluent.
Terrestrial Environment	1, 5	No impacts on the terrestrial environment.
	2, 3, 4	Extremely minor loss of habitat along force main in existing road right-of-way.
	4 only	Minor loss of crop land habitat at 20-acre lagoon site.
Cultural Resources	All	There should be no impacts on cultural resources resulting from implementation of any of these alternatives.

V PUBLIC PARTICIPATION AND COORDINATION

A. PUBLIC PARTICIPATION

The first major public involvement in the proposed project was the public hearing on the Facility Plan. This meeting was held on June 14, 1979, and was attended by approximately 50 residents of the planning area. The Facility Plan consultants summarized the findings of the Plan and answered questions regarding the project schedule and costs. Most sentiments expressed were in favor of quick implementation of the project. Following the consultant's presentation, a representative of the EPA discussed user charges and the need for an inter-governmental agreement between the City of Marion and the Lake Improvement District. A member of the EIS preparation team then briefly outlined the EIS study procedure. The hearing was adjourned after approximately two hours.

The next point of major public involvement was a public workshop on the EIS study. This meeting was held on September 8th, 1979 in the Marion County Lake Meeting Hall. The meeting was held on a Saturday to enable property owners who are at the lake only on weekends to attend. A brief presentation was made by EPA representatives on the EIS process and the various project alternatives being considered. This was followed by a question and answer session touching on a wide variety of subjects. Two members of the EIS study team participated in this workshop, which was attended by approximately 150 local citizens.

During the course of the study, EPA and EIS personnel visited the Marion County Lake area on several occasions for informal discussions with local citizens and officials.

The Draft EIS was completed in May of 1980 and distributed to all interested parties. On July 19, 1980, at 2 p.m, the Public Hearing on the Draft EIS was held in the Marion County Lake Meeting Hall. Approximately 35 persons attended the hearing, and 12 of those made statements for the record. The hearing lasted just over one hour.

The hearing was opened by the EPA Hearing Officer, who briefly described the processes involved in preparation of the Draft EIS, public review and comment, EPA responses to those comments, preparation of the Final EIS, and final decision-making. The EIS Project Officer then described the investigations undertaken in the EIS and the findings of those studies. The hearing was then opened for public comment.

Several statements were made indicating a feeling on the part of some of the public that the final decision on the project had already been made, and that the hearing was only a formality. One commenter stated that the attendance at the hearing would have been much greater if people had not thought that the final decision had already been made. It was stressed by EPA in response to these comments that the draft EIS was in fact a draft and would be revised in the final EIS to reflect any new information presented at either the public hearing or in letters of comment on the draft document. The public was encouraged to submit any additional information bearing on the draft EIS, and a 15 day extension of the comment period was offered. Only after the final EIS has been filed and reviewed for a period of at least 30 days will the EPA Regional Administrator make a final decision on the project. This determination will be published in the record of decision and distributed to all parties which commented on the draft or final EIS.

A number of questions were raised regarding the criteria used by EPA for determining the eligibility of a community for funding under Section 201 of the Clean Water Act. In particular, information was sought on the degree or extent of water pollution necessary to justify a project. Generally, the principal indicator used to determine the existence of a water quality problem or public health hazard is significant fecal coliform contamination of groundwater or surface water. Fecal coliforms are bacteria found in human and animal wastes which may indicate the presence of other disease-causing organisms. Significant contamination of surface water would be marked by recurring violations of state or national standards. Specifically for the

Marion County Lake, a violation would exist if the fecal coliform count exceeded 200 colonies per 100 milliliters, based on five samples taken during separate 24 hour periods within a 30 day period. To date, no such violations have been recorded at the Lake.

Several questions at the public hearing addressed details of the alternatives considered. These included questions on the implementation of the "more stringent controls over on-site systems," the legal and physical practicability of grey water systems, the community leach field alternative, and the limited public on-site system alternative. Chapter III, Alternatives, has been revised in this final EIS to more clearly address these questions.

One commenter pointed out that Figure 4 in the draft EIS indicates that nearly all of the soils of the study area have severe limitations for the use of septic tank leach fields. In view of this condition, it was asked why those uses should be allowed to continue. It was also asked that the differences between moderate limitations and severe limitations be explained.

In response, it was pointed out that because of the map scale used, only general soil phases could be shown and small scattered areas of soils of different characteristics could exist. Also, with low levels of water use and proper operation and maintenance, some marginal soils may provide adequate service. Soils with severe limitations are those where usage is generally unsound or not practical, based upon the permeability, depth to bedrock, and slope of the surface. Soils with moderate limitations can present problems, but may be used with careful design and good management. In all cases, on-site study and testing would be necessary to determine the permeability and depth of the soil in the exact location proposed for the leach field.

One attendee inquired why the draft EIS was concerned with water quality in the wells in the study area when the problem is with sewage. The potential for pollution of groundwater through infiltration from improperly operating septic tank leach fields was described. Water supply wells tapping such polluted groundwaters could present serious public health problems. Testing of wells in the Marion County Lake area revealed no evidence of groundwater pollution.

The comment was made that the draft EIS essentially says that the present situation is good enough at Marion County Lake. The commenter expressed the opinion that this wasn't acceptable and that the draft EIS should be completely set aside. He also stated that the results of the septic leachate survey were erroneous, and that one could simply walk around the lake and see that the growths of algae along the more heavily populated west side were much greater than along the east side of the lake. It was also mentioned that the leachate survey was not conducted during the period of peak sewage flows in the summer.

In response to these comments, it was pointed out that because of the time it takes for septic leachates to travel through the soils, maximum pollution readings will more likely be recorded some time after the actual peak usage period. Several studies have been conducted (references 75 and 76) at recreational lakes in which septic leachate detector readings were taken during times of peak occupancy and during winter periods of low sewage flows. These studies showed that winter readings were as high or higher than readings obtained in the peak season. The septic leachate detector is based upon sound scientific principles and has been used successfully in a wide variety of recreational community lakes throughout the country.

The presence of algae in the lake is not necessarily an indication of sewage pollution, but can be attributed to nutrients supplied by other natural sources, such as storm run-off from adjacent cattle grazing land and the decay of vegetation that has entered the lake. The location of the algae can be influenced by prevailing winds, protective coves, and various sources of nutrients.

It was also stated at the public hearing that EPA's policy with respect to limiting induced growth in the Marion County Lake project was apparently in direct opposition to the policy followed in a sewerage project in Missouri which was designed for ultimate growth. The project the commenter referred to was probably the Longview Lake Interceptor in the Little Blue Valley Sewer District in Jackson County.

In this project, the design called for a segment of the main interceptor to be laid in an area that was soon to be inundated by a proposed reservoir. The surrounding residential area was projected to reach ultimate development within approximately 40 years.

In this instance, construction of the second, parallel interceptor that would be required after the 20 year capacity was exceeded would have much greater adverse environmental and economic impacts than would constructing the interceptor to the full 40 year capacity at the outset, prior to impoundment of the reservoir. Since the larger pipe size was more cost effective, was consistent with projected land use patterns, and would reduce overall environmental impacts, it was approved under a variance from the usual construction grants regulations. It should be noted also that this project was funded to eliminate existing pollution from several municipal lagoon point-source discharges into the Little Blue River.

Another commenter remarked that he was overwhelmed by the volume of the draft EIS, and suggested that if all the money spent on the report had been put into construction, the system would be half built by now.

A final comment addressed the possibility that because of the fact that Kansas had traditionally been a Republican state, the current Democratic administration decided not to award further grants to the Marion County Lake Improvement District. The hearing officer assured the commenter that this was not the case, since any municipal sewage treatment construction grant funds not spent on the Marion County Lake project will be spent on other projects in the state of Kansas.

B. COORDINATION

The EIS has been prepared in coordination with other federal, state, and local agencies concerned with the Marion County Lake area. The following table presents a list of all agencies, organizations, and individuals who received a copy of the Draft EIS.

TABLE 16
DRAFT EIS DISTRIBUTION

The following is a list of agencies, organizations, and persons to whom copies of the draft statement were sent for review and comment:

Federal Agencies

U.S. Department of Defense
 Army Corps of Engineers
U.S. Department of the Interior
 Heritage Conservation and Recreation Service
U.S. Department of Agriculture
 Farmers Home Administration

State Agencies

Forestry, Fish and Game Commission
Kansas Biological Survey
Kansas Department of Health and Environment
Kansas Geological Survey
Kansas State Budget Department
Kansas State Highway Commission
Kansas State Historical Society
Water Resources Board

Local and Regional

City of Marion
 City Hall
 City Library
 Mayor
Flint Hills Regional Council
Marion County Health Department
Marion County Lake Superintendent
Wichita Public Library
Wichita-Sedgwick County Resource Advisory Board

Interested Groups

Bethel College, Department of Biology
Bird Populations Institute
Case & Sons Insurance
Davis Septic Tank Service
Don's Plumbing
Flint Hills Rural Electric Corporation
KDHE, Topeka
Kansas City Power & Light
Kansas Ornithological Society
Kansas Wildlife Federation, Inc.
Marion County Record
Moser Associates
Wichita State University, Department of Anthropology

Interested Individuals

Don Alcorn	Robert Buckley	John Darting
R. D. Allison	Scott Bunn	Charles DeForest
Hartman Baker	D. R. Bunn	Lorne W. Dexter
Joe Barnes	W. K. Carter	Mrs. John Dirkson
Ed Barnett	William Carter	Howard Dow
Johelen Beeman	Don Cole	Ron Druse
Ted Bernhardt	C. E. & Dorothy Coleman	Dean Duke
Rowlan Bevans	Norman Collins	James Dunham
Morris Bledsoe	J. Combs	Arthur Dyck
Art Boese	D. V. Conwell	Edward L. Eaton
Lloyd Boileau	G. L. Cook	Jim Edson
Byron Boothe	Charles Cowan	John Emig
Norm Bowers	Donald L. Cox	Jim and Shirley Enns
R. C. Bowlby	R. L. Crowell	Hollis Evans
Max L. Bowlin	Ronnie Crowell	Johnny Farber
E. P. Brownan	Clyde Daniels	William Fee
David Brakebill	Jim Darrow	Murray Fincher

Marion H. Ford	H. H. Jensen	Bernie Nording
Robert C. Foster	Dannie Jewett	Ed Oursler
Bruno Franz	James L. Johnston	R. E. Oursler
David George	Chester Jones	Jack Parmele
Dan Gilham	John Jordon	Don Patry
Howard Gilmer	Kenneth K. Kaufman	Bob Perry
Jim Gilmore	John Keefe	Harry Pierce
Lewis J. Gipson	Lawrence Kennedy	Robert D. Pittenger
Ona Griffith	LaVerne R. Kerbs	Boyd Raymond Powers, Jr.
B. A. Haelfrich	C. H. King	Charles Prewit
Dawn Halpin	Leona D. King	Paul Pritchard
Dennis Hancock	Albert Klenda	Eddie Quinn
Norma Hannaford	Ervin Kline	A. E. Reiss
Ann Baker Hanschu	Gene Knackstedt	Ernest Reynolds
Mrs. David Hanschu	Dale Koegeboehn	Blanch Rice
Velda Harpe	M. F. Koon	Clyde W. Riffel
Charles G. Haupt	Paul Kruse	Robert Risenhoover
Don Heinemann	M. L. Love	Larry Roe
Paul Heinemann	Helen G. Loveless	G. E. Royse
Max Heinrich	Max Loveless	Charles Royse
Harold Helton	Leroy Matz	Cecile Ruth
Lester Henderson	Mrs. R. L. May	Ed Rutherford
Denny S. Hendricks	Lawrence May	Bert Sanders
Robert D. Hensley	G. R. Mayes	Richard Sardou, Jr.
Steve Hett	C. L. McCully	Adrian Sayler
E. B. Hilligos	Calvin McGully	Richard Schill
Mrs. Wharton Hoch	Harry L. McKean	Ben Schlegel
Wayne Hoffman	Mrs. Frank McMillan	John F. Schock
Evans Hollis	Judith A. Mitchell	Robert E. Schooler
Phillip E. Holtzinger	Bob Moody	Jay Schroeder
Milton R. Huebert	Paul Morse	Verne Schroeder
Don Hughbanks	Verona Mullikin	Mrs. John Seifert
Nadine L. Hughbanks	Bill Myrick	Ronald Sell
Mrs. Neva Huguenin	Gwendolyn Neil	Lester Shubert
Dorris Hulse	Ernest Newcomb	Paul Silveous
Irvin Janzen	J. I. Newcomer	Clarence O. Simpson

Myron Simpson
James Smalley
Robert Smalley
Dale Smelling
Cedric Smith
Bob Steward
Jimmie Suderman
Ray M. Summey
Archie Thomas
Frank Tomlinson
Wilber J. Townsend
James J. Vinduska
Leo Vogelsberg
Fred Waddell
John Wall
Robert H. Walker
John Waner
L. C. Watson
Naomi Wesson
Bill Whitley
Lowell Wilder
Brad Wildin
Jim Williams
John Williams
Lee Williams
Linda Williams
Rodney Williams
Brad Winan
Wallace Wittenberg
Grant Wixon
Claude Wolf
E. L. Wood
Opal & Paul Woodward
Richard Wooley

H. C. Wullschleger
John C. Yoder
Henry Young
Reuben Zerger
Frank Zurbuchen

C. COMMENTS ON DRAFT EIS

The following pages present all of the letters of comment received on the Draft EIS, along with EPA responses to those comments. Where appropriate, changes have been made in the text of the EIS in response to these comments. Letters of comment were received from the following:

US ARMY CORPS OF ENGINEERS, Tulsa District

US DEPARTMENT OF AGRICULTURE, Soil Conservation Service

US DEPARTMENT OF HEALTH AND HUMAN SERVICES, Public Health Service

US DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

US DEPARTMENT OF THE INTERIOR, Office of the Secretary

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

A. E. REISS, REISS & GOODNESS ENGINEERS

ERNEST S. NEWCOMBE



DEPARTMENT OF THE ARMY
TULSA DISTRICT, CORPS OF ENGINEERS
POST OFFICE BOX 61
TULSA, OKLAHOMA 74121

REPLY TO
ATTENTION OF:

SWTED-E

10 June 1980

Kathleen Q. Camin, Ph.D.
Regional Administrator
United States Environmental Protection
Agency-Region VII
324 East Eleventh Street
Kansas City, MO 64106



Dear Dr. Camin:

We have reviewed the environmental assessment for the proposed sewage facilities in the Marion County Lake Improvement District, Marion County, Kansas.

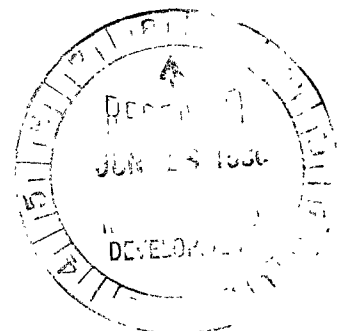
In keeping with the provisions of Executive Order 11988, the project should be located such that no encroachment upon a flood plain would occur. If it is determined that it would be impractical to locate the facilities without encroachment, measures should be taken to safeguard against flooding. The 100-year flood elevation should be determined during detailed engineering studies and 100-year flood protection designed for the project.

The placement of dredged or fill material in association with the proposed project into waters of the United States falls within the scope of the inclosed nationwide permit (Incl 1). This permit was issued pursuant to Section 404 of the Clean Water Act. Should deviations from the conditions listed in the inclosure occur, you should contact our Regulatory Functions Section to determine whether an individual permit is required.

Sincerely,

1 Incl
As stated

for Lawrence L. Higgins,
DONALD R. HENDERSON
Acting Chief, Engineering Division



RESPONSE

EPA has determined that federal participation in this project is not warranted under Section 201 of Public Law 92-500, as originally proposed. Therefore, no encroachment on floodplains or placement of dredged or fill material will occur.



United States
Department of
Agriculture

Soil Conservation Service
Box 600
Salina, Kansas
67401

July 17, 1980

Mr. Edward C. Vest
EIS Coordinator
United States Environmental
Protection Agency
324 East 11th Street
Kansas City, Missouri 64106

Dear Mr. Vest:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement for the Proposed Sewerage Facilities, Marion County Lake Improvement District, Marion County, Kansas.

- ① The second paragraph of page 68, the first and second sentences infer that fertilizer is used on native range vegetation in this area. To our knowledge, this practice is very uncommon. Also, herbicides that are used are primarily used to check the unnatural growth of woody species that were once kept in check by wildfires and other natural phenomena that have been partially or totally removed by man.
- ② Page 90 - Reference Note 53 - Very little information, if any, was taken from the 1930 Marion County Soil Survey. Reference should state - "SCS Soil Survey in progress, 1977."
- ③ The map unit names of the soils on pages B-9, B-10, and B-11 should read Chase silty clay loam, Dwight silt loam, Irwin silty clay loam, Labette-Dwight complex, Labette-Sogn silty clay loam, Sogn silty clay loam, Tully silty clay loam, Verdigris silt loam, and Labette silty clay loam.
- ④ Table B-1 on page B-12, the unified classification under severe sewage lagoon rating, PE should read PT.
- ⑤ Page B-14, paragraph d, the exception should be expanded to include Labette-Dwight complex and Labette-Sogn silty clay loam.
- ⑥ We would recommend those alternatives having the least adverse impacts on prime farmlands. If you need further assistance in identifying possible prime farmlands in the study area, please contact Almus R. Gantz, District Conservationist, Soil Conservation Service, Box 177, Marion, Kansas 66861.



RESPONSE

- ① Statements regarding the use of fertilizers and herbicides on rangeland were based on discussions with Kansas botanists and biologists (references 20 and 38), and were not specific to the Marion County Lake study area. In some rangeland areas of central Kansas, continued grazing has depleted the native species, which are favored by cattle. Where monotypic pastures of fescue have been planted to replace native vegetation, fertilizers are sometimes used to maintain the vigor of fescue in nutrient-deficient soils.
- ② Information was taken from both sources. Page 90, Reference Note 53 has been revised accordingly.
- ③ The word "loam" is frequently used with these soil names in an agricultural context. In a soils engineering context, it is normally omitted.
- ④ Table B-1 has been revised to read "PT."
- ⑤ Table B-14 has been revised accordingly.
- ⑥ Mr. Al Gantz was contacted during our study and provided valuable assistance in identifying the prime farmland in the study area.

Edward C. Vest

2

You may also want his assistance concerning conservation practice restoration.

Sincerely,

A handwritten signature in black ink, appearing to read "John W. Tippie". The signature is fluid and cursive, with a long horizontal stroke extending to the left. Below the signature, the name "John W. Tippie" and title "State Conservationist" are printed. A small, dark, rectangular stamp or mark is visible near the bottom right of the signature.

John W. Tippie
State Conservationist

cc:
Norman Berg, Chief, Washington, D.C.

DEPARTMENT OF HEALTH AND HUMAN SERVICES
PUBLIC HEALTH SERVICE
CENTER FOR DISEASE CONTROL
ATLANTA, GEORGIA 30333

July 7, 1980

Mr. Edward C. Vest
EIS Coordinator
U.S. EPA, Region VII
324 East Eleventh Street
Kansas City, Missouri 64106

Dear Mr. Vest:

We have completed our review of the Draft Environmental Impact Statement (EIS) for the Proposed Sewerage Facilities in the Marion County Lake Improvement District, Marion County, Kansas. We are responding on behalf of the Public Health Service and are offering the following comments for your consideration. Based upon EPA's findings, we agree that Federal funding for the construction of the proposed conventional gravity collection system and force main to the City of Marion's proposed treatment plant does not appear to be in the best interest of the public at this time.

We understand that your Agency has made detailed investigations of the extent of water quality problems in the Marion County Lake Improvement District. These investigations have resulted in a determination that no significant health hazards or water quality problems presently exist at the Marion County Lake and the construction of sewerage collection facilities at the Lake are currently ineligible for Federal funding. Was the septic leachate survey which was performed in November 1979 for Marion County Lake representative of the worst case conditions during the year? Is there any record of past beach closures because of poor water quality or of any disease outbreaks due to locally contaminated wells and septic tank failures? Has consideration been given to Federal participation under Section 201(h) of the Clean Water Act for replacement of those onsite systems that have failed or have the potential to fail even with the use of a proper maintenance program?

It appears that the Marion County Lake Improvement District and the County Health Department need to develop a program to periodically monitor well and lake water quality and inspect the operation and maintenance practices of local onsite treatment systems. The District and County health department should be encouraged to replace all onsite systems including any unvaulted privies with satisfactory onsite facilities or with some other acceptable treatment practice. Maintenance codes could prevent the uncontrolled discharge of "septage" from septic tanks, holding tanks, and privies into areas other than approved sites. We agree that permits and codes requiring percolation tests by registered individuals for each onsite system and mandatory inspection of all new onsite systems during their construction are necessary and would be beneficial. Have the local interests given consideration to the development of additional sanitary codes and well codes? Well codes would insure that all new wells are constructed by qualified drillers and are inspected and tested by the appropriate health department.

RESPONSE

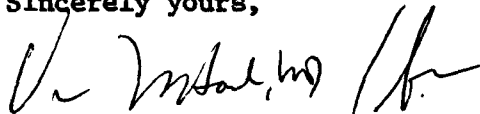
- ① Previous septic leachate studies conducted at other lakes during periods of peak use and later during the year have found that the highest discharges of pollutants from groundwater occur during late fall or early winter. This is due to the time it takes the peak summer loadings to travel through the soil to the lake (references 75 and 76). The letter on the following page from William Kerfoot of K-V Associates cites those studies that specifically addressed testing at seasonal lakeshore residential areas.
- ② There have been no documented cases of waterborne disease in the Marion County Lake area. The Marion County Sanitarian regularly samples water quality at the swimming beach. Fecal coliform counts in the swimming area have never exceeded 200 colonies per 100 milliliters, which is the Class A standard for full body contact recreation. Most readings have been between 5 and 10 colonies per 100 ml (reference 3). There have been no beach closures due to bacterial contamination.
- ③ The limited public on-site system alternative described in Chapter III addressed the possibility of federal participation in the replacement of failing on-site systems. Subsection (1) of Section 201(h) of the Clean Water Act requires that the public body receiving the grant (in this case, the Lake Improvement District) be "...otherwise eligible for a grant...". Since the investigations conducted as a part of this EIS determined that no significant water quality problems exist, the public body is not considered eligible at this time.
- ④ EPA concurs with the recommendation that all existing wells and septic tank systems be regularly monitored and inspected. The present shortage of personnel, available funding, and appropriate mandates, however, severely limits the County Health Department's powers over wells and septic tank systems already in place. EPA recommends that Marion County give serious consideration to implementing more stringent sanitary and well codes, and to providing additional resources to the County Health Department to allow a more thorough and comprehensive testing and inspection program. The existing Marion County

Page 2 - Mr. Edward C. Vest

- ⑤ According to the EIS, "most nutrients" entering Marion County Lake are probably from cattle grazing areas in the watershed. What local efforts have been made to minimize this nonpoint pollution source?
- ⑥ The EIS should provide a better description of the environmental setting of Lake Marion. An estimate of the Lake's trophic status and its compliance with applicable water quality standards should be indicated.
- ⑦ Any expected increase in residential development by any of the project alternatives in the vicinity of the Lake should consider the potential effects from existing and future airport operations at Marion Landing Field.

We appreciate the opportunity to review this Draft EIS. Please send us one copy of the final document when it becomes available.

Sincerely yours,



Frank S. Lisella, Ph.D.
Chief, Environmental Affairs Group
Environmental Health Services Division
Bureau of State Services

Sanitary Code and state regulations together require that all new wells and septic tank systems be properly designed, inspected, and installed by licensed individuals.

- ⑤ There have been no known efforts to reduce the nonpoint source pollution of the lake. This is probably due, in part, to the relatively small size of the farms adjacent to the lake.
- ⑥ Other than the water quality sampling conducted as a part of this study and the regular sampling of the swimming area by the County Sanitarian, there is no water quality data available for the Marion County Lake. The sampling results obtained through this EIS characterize the lake as high in dissolved oxygen and nutrients, and low in organics and suspended solids. The concentrations of total phosphorus ranged from 12 to 26 micrograms per liter. Total phosphorus for eutrophic lakes typically ranges from 10 to 30 micrograms per liter. There have been no violations of the Class A standards for fecal coliforms.
- ⑦ Present aircraft operations at Marion's 2600-ft paved runway are quite limited, and no appreciable increase is expected.



K-V ASSOCIATES, INC.
ANALYTICAL SYSTEMS

281 MAIN STREET • P.O. BOX 574 • FALMOUTH, MASSACHUSETTS 02541 617-540-0561

July 14, 1980

Mr. Joseph Leindecker
Sverdrup and Parcel
800 N. 12th Blvd.
St. Louis, Missouri 63101

RE: Appropriate Time for Septic Leachate Surveys

Dear Mr. Leindecker:

Barbara Bowerman of EPA Region V recently called and asked us to forward information on the appropriate time of year for septic leachate surveys. Separate study areas in Minnesota, Michigan, Indiana, and Massachusetts have shown that the optimal time for leachate detection of seasonal lakefront areas falls between late August and February. While hydraulic overflows of systems occur at peak use periods, the maximum loading into groundwater is delayed in passage before reaching the shoreline. For instance, if the prevailing groundwater flow rate is 3 feet/day and a septic leaching unit is 120 feet from the shoreline, it will take 40 days from peak load before maximum discharge would occur.

We are forwarding you two reports, one on Ottertail Lake, Minnesota and the other on Steuben Lakes, Indiana where midsummer surveys were performed after questions were raised as to whether the studies should have been performed at peak use. In both cases, summer discharges were less than previously determined during the late Fall - early Winter periods.

If you have any questions, please call. We are also enclosing some recent information on groundwater flow meters that may be of interest to you.

Sincerely,

William B. Kerfoot

WBK:phk
Enclosures



**U.S. Department of Housing and Urban Development
Region VII**

In Reply Refer to:

Professional Building
1103 Grand
Kansas City, Missouri 64106

June 23, 1980

Mr. Edward C. Vest
EIS Coordinator
U.S. Environmental Protection Agency
324 East 11th Street
Kansas City, Missouri 64106

Dear Mr. Vest:

Subject: Draft Environmental Impact Statement: Proposed Sewerage Facilities,
Marion County Lake Improvement District, Marion, Kansas (May 1980)

The draft Environmental Impact Statement (EIS) for the referenced project has been reviewed at the Kansas City Area Office, Department of Housing and Urban Development (HUD). The review was made on the basis of the following considerations: 1) HUD's areas of review responsibility in accordance with the National Environmental Policy Act of 1969, and 2) HUD's activities in the immediate area that might be affected by the proposed action.

The following comment is provided for your consideration:

The Department of Housing and Urban Development recently provided a Community Development Block Grant (CDBG) for a water system project to replace and upgrade over 12,000 feet of water lines in the western and southwestern portions of the City of Marion. The Area Office's review of the draft EIS for the proposed sewer project did not identify a conflict with or significant impact on this CDBG water system project. However, a total water/sewer systems study had not been reviewed by the Area Office. It is recommended that consideration be given in the final Environmental Impact Statement to projected impacts of all water/sewer facilities, including water system replacements and improvements in the City of Marion, to assure compatibility and efficiency between upgraded water systems and proposed sewerage facilities.

Thank you for providing HUD the opportunity to review the draft EIS. Your fullest consideration of the above comment will be appreciated.

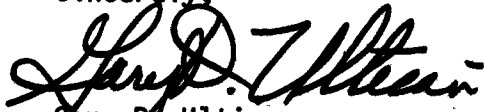
RESPONSE

The upgraded water system funded by the Department of Housing and Urban Development provided improvements in the western and southwestern portions of the City of Marion. The Marion County Lake Improvement District planning area lies approximately two miles to the southeast of that water system project area, outside the Marion city limits. All water in the Marion County Lake Improvement District planning area is provided by private wells. Because of the geographical separation between these two project areas, and the different governmental units involved, there could be no impacts on, or from, the upgraded water system.

2

Should you have questions regarding our review, you may contact me at FTS 758-3192.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary D. Ultican". The signature is stylized with a large, looped initial "G" and a trailing flourish.

Gary D. Ultican
Regional Environmental Officer



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

ER 80/534

AUG 15 1980

Kathleen Q. Camin, Ph.D.
Regional Administrator, Region VII
Environmental Protection Agency
324 East Eleventh Street
Kansas City, Missouri 64106

Dear Dr. Camin:

We have reviewed the draft environmental statement for Sewerage Facilities, Marion County, Kansas and have the following comments for your consideration.

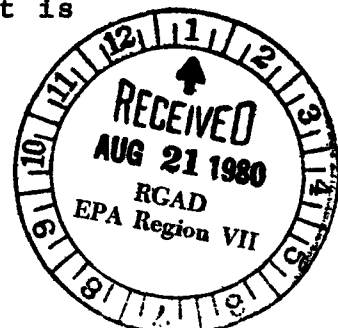
General Comments

- ① The statement should thoroughly describe the Gage Shale, which is said to constitute a very efficient aquiclude (app. D, p.18). In particular, a complete description of the fracture pattern(s) and fracture characteristics of the reportedly "thinly fractured" shale (app. D, p. 18) is needed to aid in the assessment and in the understanding of the lake/aquifer relationships and ground water hydraulics suggested by figure 5 of appendix D.

Fish and Wildlife Resources

- ② From an environmental standpoint, we recommend that the treated effluent be used for land application or be totally retained in a shallow water evaporative pool. The treated effluent could be sprayed on a tract of land set aside for wildlife habitat. This is one alternative that was omitted but deserves discussion. In addition, this would eliminate the problems pointed out on page 71 with discharging into an intermittent tributary to the Cottonwood River.
- ③ Be advised the bald eagle (Haliaeetus leucocephalus) and the peregrine falcon (Falco peregrinus), federally listed endangered species, are known to occur in the project area.

It is the Environmental Protection Agency's responsibility to review each project and evaluate the possible effects on federally listed endangered species. The determination to be made on each project is whether the proposed action "may affect or will not affect" listed threatened and endangered species. If it is



RESPONSE

①

Page 18 of Appendix D states that the upper portion of the Gage Shale "acts as an aquitard with its low permeability." The Kansas Geological Survey (reference 78) describes the Gage Shale as follows: "The Gage Shale Member is mostly clayey shale, but calcareous fossiliferous shale and a minor amount of limestone occur in the upper part. The lower and middle parts are chiefly noncalcareous red, green, purple, and chocolate-colored shale interbedded with gray and yellow shale. The characteristic thickness is approximately 45 feet."

Bowers (reference 48) describes the Gage Shale from USGS Bull. 1060-B (reference 51) as follows: "The Gage Shale is about 45 feet thick. It is tan in color and thinly jointed in the upper half; the lower half is predominantly maroon in color and massive to blocky."

Bowers states that the top of the water table in the lake area prior to 1938 was located in the lower half of the Gage Shale, where the old, hand-dug wells ended. The lower portions probably contain more crevices and joints to transmit water than the upper portion. This aquifer may have been very poor by today's standards.

Bowers feels that the upper part of the Gage has lower permeability than the lower Gage which in turn has lower permeability than the Towanda limestone.

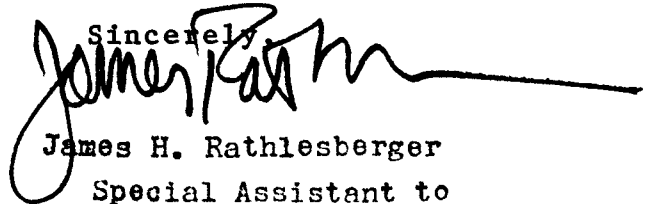
After the dam was constructed the piezometric surface rose due to percolation or leakage from the lake into the aquifer. This connection has not been verified.

Bowers says that the top of the aquifer may be at any point where the permeability changes significantly. The top of the Towanda limestone may be the top of the aquifer, and the Gage Shale may be a leaky aquitard. Bowers concludes: "that the aquifer in the Marion County Lake area is probably the Towanda limestone and/or the lower portion of the Gage shale. The lake acts as a recharge boundary. The upper portion of the Gage shale, because of its relatively low per-

④ determined that the project "may affect" an endangered species either adversely or beneficially, formal consultation must be initiated. However, if it is determined the project "will not affect" an endangered species, no further action is necessary and the procedure is terminated. The Regional Director of our Fish and Wildlife Service has the prerogative to request EPA to formally consult on any project if deemed necessary. We request that Mr. Larry Visscher, Endangered Species Coordinator, Kansas City Area Office, North Kansas City, Missouri (816-374-6166) be contacted if further assistance is required in making a determination.

Thank you for the opportunity to comment on this draft environmental statement.

Sincerely,



James H. Rathlesberger
Special Assistant to
Assistant SECRETARY

meability acts as an aquitard. The aquifer most likely is a very leaky artesian aquifer. This fact could not be verified by the local well drillers or the small scale pump test. The aquifer is adequate for individual water supplies, as evidenced by the small drawdown to equilibrium during the pump test."

- ② The spray application of treated effluent on land set aside for wildlife habitat or the retention of treated effluent in a shallow water evaporative pool would certainly have significant benefits for fish and wildlife resources in the study area. However, acquisition of such lands would be expensive compared to other methods of discharge considered, and would require a significant amount of land classified as prime farmland. The U.S. Department of Agriculture has officially recommended those alternatives with the least impact on prime farmland. In any case, EPA has determined not to fund any project in the Marion County Lake area at this time.

- ③ According to Marvin Schwillig, endangered species liaison for the Kansas Fish and Game Commission, both the bald eagle and the peregrine falcon have a statewide distribution in Kansas. The peregrine is an uncommon seasonal (spring and autumn) transient and an occasional winter resident, typically found around marshes, lakes, and rivers. There are no specific records of peregrine falcon sightings in the study area.

The bald eagle is a winter transient and a local winter resident in Kansas, chiefly found around large lakes, reservoirs and marshlands. The bald eagle has been sighted in the Marion County Lake study area. It is presumed that eagles occasionally pass through the study area from Marion Reservoir, about five miles to the northwest, to utilize Marion County Lake as a feeding area since prey species of bald eagles (fish and sometimes water fowl and mammals) occur at Marion County Lake. Marion Reservoir is the area's most often utilized wintering habitat for eagles since it has an abundance of prey, and

diurnal and roosting habitats. While Marion County Lake can provide feeding habitat for eagles, the close proximity of human activities and lack of roosting habitat in the vicinity of the lake most likely preclude the possibility of eagles as permanent winter residents at Marion county Lake. It is, therefore, our opinion that none of the alternatives considered for the Marion County Lake Improvement District would affect an endangered species either adversely or beneficially.

④

Mr. Larry Visscher, Endangered Species Coordinator for the Kansas City Area Office of the Fish and Wildlife Service, was contacted and he concurred in our determination that the bald eagle would be an infrequent transient at the Marion County Lake.



State of Kansas . . . John Carlin, Governor

DEPARTMENT OF HEALTH AND ENVIRONMENT

Joseph F. Harkins, *Secretary*

Forbes Field
Topeka, Kansas 66620
913-862-9360



July 18, 1980

Edward C. Vest, EIS Coordinator
U.S. EPA - Region VII
324 East 11th Street
Kansas City, Missouri 64106

Re: Marion County Lake Improvement District
EPA Project C20 0741 01

Dear Mr. Vest:

We have reviewed the Draft Environmental Impact Statement (EIS) for the proposed sewerage facilities in the Marion County Lake Improvement District and offer the following comments for your consideration in the preparation of the Final EIS:

- ① There are several references in the Draft EIS to "Kansas regulations" which do not allow gravity sewer pipes less than 8 inches in diameter. The Department's "Minimum Standards of Design for Water Pollution Control Facilities" are not regulations. The "Minimum Standards" are design guidelines developed by the Department with input from several groups, including a committee of Consulting Engineers.
- ② We take exception to the statement that the project is ineligible for Federal assistance. Both the Federal regulations and the Kansas Priority System allow projects for the protection of water quality. The proposed project is clearly eligible for Federal funding under this criteria. However, the project priority ranking may change significantly as a result of the findings reported in the Draft EIS.
- ③ The projected wasteloads appear to completely ignore any contributions from day visitors to the Lake area. This position is not consistent with the agreement reached at a May 9, 1979 meeting at our offices with representatives of EPA, Reiss and Goodness Engineers, and our staff. It has been reported that as many as 4400 people may visit the Lake area daily on a major holiday weekend. We do not believe it is prudent to assume that the only people who use restrooms are those that stay at the Lake overnight.

RESPONSE

- ① Comment noted. The "Foreword" to the "Minimum Standards" states that the document "...is developed pursuant to K.S.A. 65-171h..." (Par. 2), and "The standards in general indicate required minimum and maximum design requirements." (Par. 3, emphasis added). Although paragraph 3 also states that "...the requirements in this document may be waived upon presentation of sufficient justification..." (again, emphasis added), EPA feels that, while the "Minimum Standards" may not be "regulations" in the strictest legal sense, their development pursuant to law and their frequent use of terms such as "required" and "shall" give them the weight of regulations as that term is commonly understood.

In the specific instance cited in the comment, Chapter VI, Page 2, Article D-1 of the Minimum Standards states: "No public gravity sewer shall be less than 8 inches in diameter." No criteria are given for justifying size reductions.

- ② It is true that Federal regulations allow funding for projects to protect water quality. However 40 CFR, Part 35, subpart E, Section 35.901, states: "The primary purpose of Federal grant assistance available under this subpart is to assist municipalities in meeting enforceable requirements of the Act, particularly, applicable National Pollution Discharge Elimination System (NPDES) permit requirements." Further, Section 35.917(b) states, "Facilities planning will demonstrate the need for the proposed facilities," (emphasis added, both places). Essentially, these and other regulations and guidelines promulgated pursuant to the Clean Water Act of 1977 (P.L. 95-217) conform to the Act's intent that the construction grants program be used to assist municipalities in cleaning up existing pollution problems.

The investigations conducted found that, as stated in the last three lines on page 51 of the Draft EIS, "...there is no evidence that present water quality is being degraded." It follows that there are no "enforceable requirements," nor any significant threats to existing water quality. The Lake Improvement District is, therefore, ineligible for a grant at this time.

- ④ The City of Marion has notified our Department that they propose to change both the treatment process and treatment plant location from that proposed in the City's original Facility Plan. The City's request is currently being studied by our Department and EPA. The cost of installing an additional mile of force main and other changes should not, however, change the relative ranking of alternatives in the cost-effectiveness analysis presented in the Draft EIS.
- ⑤ We note that the major issues to be addressed in the EIS were potential secondary development, water quality and public health, archeological sites, and economic impacts. The impact summary states ". . . growth rate is not expected to vary significantly whether sewers are built or not, since other factors exert more control". The impact summary indicates no adverse problems with any alternatives with respect to water quality and public health or archeological sites. We find it interesting that, with all of the concern expressed for the economic impacts on the people, it now appears that the people may be forced to live with the fourth most costly alternative. Based upon the cost-effectiveness analysis presented in the Draft EIS, the local costs for the "No Action" alternative are more than 40% greater than the local costs for construction of the proposed improvements. We recommend that the economic impacts of the "No Action" alternative be discussed more thoroughly.

If you have any questions concerning these comments, please feel free to contact me.

Sincerely yours,

Division of Environment



LaVene R. Brenden, P.E.
Chief, Municipal Unit
Water Pollution Control

LRB:jaw

cc: Deborah Mau, EPA
Sverdrup and Parcel
Reiss and Goodness Engineers
Marion County Lake Improvement District

It must be remembered that the intent of the construction grants program is to assist existing municipal dischargers in upgrading their facilities to comply with the Act. There was no intention to have EPA assume the role, historically relegated to local units of government, of providing the initial sewerage facilities for an area. That burden must still be assumed entirely by local residents unless it can be shown (which was not the case at the Marion County Lake) that there are immediate, overriding water quality concerns that will be corrected by the initial installation of sewerage facilities.

- ③ The projected wasteloads presented in Tables 6 and 7 did not include the contributions of day visitors. During the 1980 summer season, it has been reported that the Memorial Day and 4th of July weekends were the busiest, and that approximately "a couple thousand" persons visited the Lake on those days, including the overnight campers (reference 77). Overnight campers for the current peak day are estimated to be approximately 1050 (Table 2). The number of uncounted day visitors in the year 2000 would therefore be approximately 950 plus the projected increase in day visitors expected by the year 2000. If one assumes that the number of day visitors will increase at the same rate as campers (see Appendix I, Section 2.c), the projected peak-day day visitors will total approximately 800 persons. At 10 gallons per capita (reference 11), the additional peak day load will equal approximately 8,000 gallons. These additional flows will occur at most only about ten times per year. It is reported that on an average summer weekend, there are only about a hundred visitors at the park (reference 77), well within the conservative estimate of 350 used in Table 1. The cost of transporting and treating this small amount of additional wastewater should not change the relative ranking of alternatives in the cost-effective analysis presented in this EIS.

④

The EIS has been revised to reflect this proposed change. While this proposed change would raise the capital and operating and maintenance costs of the Facility Plan proposed project alternative and the down-sized Facility Plan proposed project alternative, we agree that the relative rankings of the cost effectiveness of the alternatives would not be affected.

⑤

As pointed out in Chapter IV, section D.2, annual costs for the no-action alternative and for the limited on-site systems alternative were calculated using the assumption of equal per capita flow rates for all alternatives. This conservative approach was used to ensure comparability in the service levels provided by each project alternative. In actual practice, individuals using on-site systems would be able to reduce their per capita flow rates significantly through voluntary water conservation measures. Information collected from individuals and holding tank pumping services in the Marion County Lake area indicate that actual per capita flow rates are considerably less than the 65 and 50 gallons per capita per day assumed for permanent and seasonal residents, respectively. For the 11 holding tank residences for which we were able to obtain reliable pump-out data, all had flow rates of less than 25 gallons per capita per day.

Please note also that the Draft EIS contained an error in the computation of the annual debt service presented in Table 13, "Local Costs - 1980." The correct figures are shown in revised Table 13 on page 64 in this document. The annual debt service was calculated by amortizing the local share of capital costs over the 20 year economic life of the project at 8.78%, the September 5, 1980 average interest rate for municipal bonds listed by the St. Louis Federal Reserve Bank.

The revision of the annual local debt service figures resulted in a change in the Annual User Charges presented in Table 14 on page 65. As you will note, these changes have, in some instances, affected the ranking of the costs of the various alternatives. As stated previously, however, the economic impacts of the alternatives have no bearing on the fact that sufficient water quality problems were not found to merit federal grant assistance for any project.

REISS & GOODNESS ENGINEERS

2160 WEST 21ST STREET
WICHITA, KANSAS 67204
(316) 832-0213



July 3, 1980

Mr. Edward C. Vest, EIS Coordinator
Environmental Protection Agency
Kansas Branch - Region VI
324 East 11th Street
Kansas City, Missouri 64106

RE: Marion County Lake Improvement District
Environmental Impact Statement

Dear Mr. Vest:

I am appalled by the grandiose handling of this report. It purports to be abstract and handled in the best interests of the E.P.A., but, in my opinion, it totally ignores the local people's wishes and knowledge.

①

The "leachete study" for all of its questionable value needs to be defined as to what was done and how the conclusions were arrived at. The same may be said for the infra-red aerial survey. In so doing, it needs to be pointed out that any spot samples would be just that and cannot be the basis for the total conclusions.

②

The aerial survey was done in October of 1979 and during that month we had 6.15 inches of rain. It appears that the rains would obliterate and destroy any positive identification of pollution, etc. and in this region of Kansas there would not be vegetative "burn outs" in October. In fact, everything will have matured and be in seed.

③

In short, the report has been written to cover E.P.A.'s shortcomings to their officials and does not address "local needs and planning". The citizens in this area have been aware of the thin soil mantle, the poor porosity of the clay, the bedrock and the results of septic tanks and holding tanks. They and their local elected officials have been diligent in their efforts to protect the lake and their drinking water. To this end, they are being told they should continue status quo and go away.

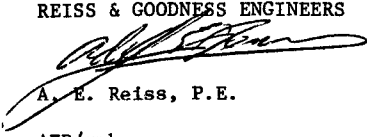
④

To say that they are not needing a central sewer system is bureaucratic lunacy and does not answer the question nor address local problems for now or in the future.

I recommend that the "study?" be set aside as if it never existed and allow the District to continue normally and if they want a sewer system, they should be entitled to the same consideration in the marketplace as any other legal entity in the United States.

Sincerely,

REISS & GOODNESS ENGINEERS


A. E. Reiss, P.E.

AER/rmk

cc: LaVene Brenden, Kansas State Department of Health & Environment
Herb Wullschlegel, Chairman, Marion County Improvement District
James Johnston, Secretary, Marion County Improvement District
Cecil Post, Marion County Improvement District
D. W. Wheeler, Attorney, Marion County Improvement District
Congressman Dan Glickman
Senator Robert Dole
Senator Nancy Kassebaum

RESPONSE

- ① Complete details of the septic leachate survey, including theoretical considerations, methodology, and conclusions, were presented in Appendix D of the Draft EIS, and are also included in this document. The infrared aerial survey is described in Chapter IV, section 1.c. Neither of these investigations were "spot" samples. The infrared aerial survey covered the entire study area, and the septic leachate detector sampled continuously around the entire perimeter of the lake.
- ② The infrared aerial survey was flown on October 17, 1979. The rainfall records for the month of October at the Corps of Engineers Marion Reservoir, the nearest official gaging station, are as follows:

<u>Date</u>	<u>Precipitation</u>
1-17	No precipitation
18	.02"
19	.89"
22	.80"
23	.08"
30	1.82"
31	2.54"
Total for Month	6.15"

These records indicate that the study area was relatively dry at the time of the aerial survey. As a general rule, burn outs resulting from over-enrichment are more likely to occur shortly after periods of soil saturation. To be sure that the Marion County aerial survey was reasonably representative of normal conditions, several concentrations of septic tank leach fields in the Halfday Creek area just north of Topeka were also photographed which had previously been surveyed during a wetter period in the spring of 1979. Specific sites in this area indicated as possible leach field failures in the fall survey correlated well with those discovered and verified by ground inspection in the earlier spring survey.

③

The limitations of the soils in the study area for use in septic tank absorption fields are discussed in detail in Appendix B.

④

There is no question that a central sewer system would provide some benefits for the Marion County Lake area. It would provide a solution for those few septic tank systems that are presently not functioning properly, and it would insure that future failures would not threaten the water quality of the lake. However, given the magnitude of the water pollution problem nationwide, and the relative lack of funds available for sewerage facility construction, it is important that a balance be struck between the severity of the pollution problem and the amount of funds expended to correct it.

For this reason, the Construction Grants program was established with its main goal to be the improvement of water quality. The supplementary information to 40 CFR 35, Subpart E states that "Federal assistance for publicly owned treatment works under the Act is intended to correct and reduce the backlog of pollution problems." Later, in discussing EPA policy on new collector sewer projects, it states "It was intended to insure that the limited construction grant funds available are obligated for collector projects only when needed to correct a problem of public health or ground or surface water pollution." Investigations conducted for this EIS found no public health problems and no indications of ground or surface water pollution.

Wichita, Kansas, 67211
641 South Hillside
July 26, 1980



Dr. Kathleen Q. Camin
Regional Administrator E. P. A.
324 East Eleventh Street
Kansas City, Missouri, 64106

Dear Doctor Camin:

Although this letter is addressed to you and, when I say "you", I am referring to your department and not to you as an individual.

- ① I did not attend the meeting at the Marion County Lake office on Saturday because we had been told at the previous meeting that you were not going to help us fund our sewer project. I could see no reason to go up there in over 100 degree heat and listen to the people say "no" again. I see by the Marion County Record that you were surprised that only twenty-five people were there. The rest felt just like I and they also knew that you had said "no."

I have had experience with these "hearings" before. A few years ago, the D.O.T. held a hearing on a highway that concerned me. Another man got up and said "You call this a hearing---It is not a hearing---it is a telling---you're TELLING us what you are going to do." I talked and asked one of the engineers a question. He answered in the negative because I caught him by surprise. His answer did not appear in the final draft. None of the suggestions that were made were included in the final plans---they were exactly like they were before the "hearing."

This is very similar to the hearings and explanations on this sewer project. I told Mr. Wullschleger, our president, that the whole thing looked very doubtful to me after the very first meeting. He and his committee showed the State pictures of outdoor toilets and wash water running down ditches but you don't seem to think these are a danger.

- ② My neighbor, C.E. Coleman, was told he was out of order when he spoke at this last meeting---Why? because he was saying things some of the group from your office apparently didn't like.

- ③ One of the most assinine suggestions of the whole afternoon was for each of us to install an extra holding tank in addition to our septic tank. Most of our yards are filled with laterals and a holding tank will take up some of that room. Also, a suggestion like this tends to make me feel that you realize that we either are going to have trouble or we already have trouble. We hear of "locking the barn after the horse is stolen". Apparently that is what you want us to do---wait until after we get sick and have a lot of problems and, then, you will do something.

Respectfully

Ernest S. Newcombe

CC Herbert C. Wullschleger, Marion County Lake.

RESPONSE

- ① The purpose of the public hearing on the Draft EIS was to inform the local public of the preliminary findings of the EIS and to provide an opportunity for the public to comment on the methods and conclusions of the study and to allow them to provide additional information pertinent to the study. A final decision on the Marion County Lake sewerage project will not be made until at least 30 days after the publishing of this Final EIS.
- ② At the public hearing, C. E. Coleman raised the possibility that the findings of the EIS were influenced by the fact that Kansas has traditionally been a Republican state and that the current administration in Washington is Democratic. EPA's response was an assurance that national politics do not exert any influence on a project such as Marion County Lake. Any funds scheduled for this project which are not expended will be available for use in other water pollution control projects within the state of Kansas.
- ③ No suggestion was made that holding tanks be added to lots with properly functioning septic tank systems. On small lots where the existing septic tank leach field fails, the only practical alternative may be to install a holding tank to substitute for the septic tank system. Also, in instances where the lots are of sufficient size, installing a second leach field to be used alternately with the first will prolong the useful life of both fields.

It is recognized that because of the small lot sizes and the relatively poor soils in the lake area, some septic systems have failed in the past, and some will undoubtedly have problems in the future. The above recommendations, combined with regular maintenance, water conservation, and regular inspections should greatly reduce future pollution problems.

VI CONCLUSIONS AND RECOMMENDATIONS

A. CONCLUSIONS

In an attempt to determine the extent of water quality problems in the Marion County Lake Improvement District, EPA performed a variety of investigations. Water samples from a large number of private and public water supplies were tested for indications of sewage pollution; infrared aerial photos of the entire area were taken to detect surface evidence of septic tank leach field failures; and, a septic leachate survey of the entire lakeshore was performed to determine if insufficiently treated sewage was entering the lake from improperly operating leach fields. The methodologies used in these tests and the results are presented in Chapter IV.

Based upon the results of this series of tests, EPA has determined that no significant health hazards or water quality problems presently exist at the Marion County Lake. Because the Construction Grants program was established primarily to assist local communities in dealing with existing sewage problems, the construction of sewerage facilities at the lake is considered to be ineligible for federal assistance under this program. If, at some future time, there is a change in water quality conditions, the Improvement District could submit another application for federal assistance. The following section outlines other actions that could be taken now to safeguard the existing water quality and to deal with future water quality problems as they arise.

B. RECOMMENDATIONS

The Lake Improvement District could construct the proposed project, or any of the other alternatives considered, without federal assistance. This would, however, pose extreme financial hardships for many property owners in the District, and would result in very little improvement in the existing water quality. A more reasonable approach would consist of public and individual actions to improve the operation and reliability of existing and future on-site systems.

One such measure could involve an agreement between the Lake Improvement District and the County Health Department to establish a regular schedule of detailed inspections of all sewerage systems and water supply wells in the District. This practice would reduce the possibility of septic tank leach field failures going unnoticed over long periods of time. The County Health Department might also require that percolation tests be performed only by independent, approved persons, such as members of the department or registered engineers, and that all septic tank systems be inspected during installation. EPA recommends that Marion County give serious consideration to providing additional resources to the County Health Department to allow them to implement more thorough and comprehensive testing and inspection programs, as described above.

Individuals in the District could extend the operating life of their leach field systems and reduce the expense of pumping their holding tanks by reducing their water consumption. A number of devices are available that involve neither increased maintenance nor any changes in water use habits. These include shower head flow controls, dual cycle or other low-volume toilets, and lavatory faucet flow control devices.

It might also be possible to establish through the County Health Department a program of technical information and assistance to install grey water systems that would help prevent hydraulic overloading of septic tank systems and reduce by approximately 65 percent the amount of wastewater discharged to holding tanks.

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GLOSSARY

Absorption field - a system of buried, perforated or discontinuous pipes (laterals) through which partially treated wastewater leaving a septic tank is distributed over an area for further treatment by percolation into the soil; same as "adsorption field," "lateral field," or "leach field."

Adsorption field - an absorption field.

Aerobic - the presence of free elemental oxygen.

Alternative wastewater treatment systems - wastewater conveyance and/or treatment systems other than conventional, centralized systems. They include septic tanks and drain fields, other on-site systems, cluster systems, and small diameter collection systems, as defined in 40 CFR 35, Appendix E.

Anaerobic - the absence of free elemental oxygen.

Aquifer - an underground, water-bearing stratum of permeable rock, sand, or gravel.

Alluvial - relating to material deposited by a stream.

Avian - of, pertaining to, or relating to birds.

Benthos - organisms dwelling on the bottom of a water body. The benthos includes all organisms which crawl on, burrow into, or grow attached to, the bottom.

Biochemical oxygen demand (BOD) - the quantity of oxygen used in the biochemical decomposition of organic matter; used to indicate the amount of organic matter present in water; BOD₅ refers to a biochemical oxygen demand reading taken from a test in which a water sample is incubated with bacteria for 5 days at 20°C. In common usage, "BOD" refers to "BOD₅."

Biota - the plants and animals of an area, taken collectively.

Calcareous - any substance that contains calcium carbonate.

Carbon monoxide - odorless, toxic gas contributing to air pollution, released mainly by motor vehicles.

cfs - cubic feet per second.

Chemical oxygen demand (COD) - a measure of the oxygen-consuming capacity of inorganic and organic matter present in water or wastewater.

Chert - a hard, extremely dense sedimentary rock consisting primarily of cryptocrystalline silica; mostly semi-vitreous and usually occurring as nodules or concretions in limestone and dolomite.

Chlorination - disinfection of water by treatment with chlorine.

Claypan - a dense, heavy, and relatively impervious subsurface soil layer that owes its hardness to a relatively higher clay content than that of the overlying material; also "hardpan."

Clean Water Act - federal law passed in 1977 revising Federal Water Pollution Control Act Amendments of 1972; pertinent sections are 201, 208, and 303 (e).

Cluster system - wastewater treatment system in which effluent from several individual septic tanks is collected and treated further in a community absorption field, rather than in individual fields.

Coliform - a group of bacteria which includes organisms found on plants, in soils, and in human and animal feces; their presence is used as an indicator of water pollution.

Colluvial - pertaining to a loose, heterogeneous, incoherent mass of soil material or rock fragments deposited by mass-wasting; usually at the bottom of a cliff or steep slope.

Comminutor - a device that grinds solids in wastewater prior to other treatment.

Complete-mix activated sludge system - a biological wastewater treatment process in which a mixture of wastewater and bacteria is agitated and mechanically aerated, allowing bacterial decomposition of waste solids; bacteria and remaining solids are subsequently separated from the treated wastewater by settling and wasted or returned to the process as needed.

Construction Grants Program - a program administered by EPA to carry out the mandate of the Clean Water Act to assist local communities in funding municipal wastewater facilities.

Deciduous forest - an association of trees that shed their foliage at the end of a growing season.

Design flow - the volume of wastewater a facility is expected to process in a given length of time; usually the average daily amount of wastewater expected to be produced in a facility's service area 20 years after its construction.

Differential settlement - non-uniform settlement of a geologic formation or soil.

Dip - the angle that a structural geologic surface makes with the horizontal, measured perpendicular to the line formed by the intersection of the surface with the horizontal.

Drift - a general term applied to all rock material transported by a glacier and deposited directly by or from the ice, or by running water emanating from a glacier.

Ecosystem - a system formed by the interaction of a group of organisms and their environment.

Ecoregion - a geographical area over which the environmental complex, produced by climate, topography, and soil, is sufficiently uniform to permit development of characteristic types of ecologic associations.

Edaphic - pertaining to the soil.

Effluent - wastewater discharged from a facility or one of its components.

EIS - Environmental Impact Statement.

EPA - U. S. Environmental Protection Agency.

Escarpment - a long, continuous cliff or steep slope facing in one general direction.

Eutrophication - the process of maturation of a lake from nutrient-poor to nutrient-rich. The artificial addition of nutrients to lakes accelerates the process.

Extended aeration - a complete-mix activated sludge system in which the amount of influent wastes is relatively small compared to the amount of bacteria in the system, requiring longer detention times than conventional complete-mix activated sludge processes and resulting in less sludge wastes.

Facilities Plan - a preliminary engineering report on proposed wastewater treatment facilities; developed to fulfill Step 1 requirements of EPA's Construction Grants program; analyzes treatment needs, alternative treatment methods, existing sewer system adequacy, and costs; includes an environmental assessment; also referred to as a "201 plan."

Fault - a surface or rock fracture along which there has been displacement.

Fauna - the animal life of an area.

Fecal coliform - group of bacteria present in human and animal intestines and excreted in feces; while harmless in themselves, fecal coliforms may indicate the presence of pathogens.

Flaggy - tending to split into layers of suitable thickness for use as flagstones; layered bedding 1 to 10 cm. in thickness.

Flood plain - the land adjacent to a river channel that is covered with water when the river overflows its banks.

Flora - the plant life of an area.

Fold - a curve or bend of a flat structure or structures such as rock strata.

Force main - a sewer through which wastewater is pumped.

gpcd - gallons per capita per day.

gpd - gallons per day

gpm - gallons per minute

gpy - gallons per year.

Gravity sewer - a sewer in which the wastewater flows downhill from source to outlet, with no pumping required.

Grit chamber - initial phase of primary treatment in which large solids - generally inorganic ones - are removed.

Habitat - the place where an organism lives.

Holding tank - a large tank (typically 1000-1500 gallons) used to store wastewater until it can be collected by a pump truck (honeywagon) for transport to a treatment plant.

Honeywagon - a tank truck used for transporting raw wastewater or septage.

I/I - the combined extraneous wastewater flow from infiltration and inflow.

Infiltration - (1) movement of water downward into the soil; (2) water entering a sewer system underground by such means as cracks in sewer pipes and manholes and leaky pipe joints, usually caused by a water table above the level of the sewer.

Inflow - water other than sewage entering a sewer system directly by such means as connections with storm sewers, roof and foundation drains, sump pumps, and holes in manhole covers.

Influent - wastewater entering a wastewater facility or component thereof.

Infrared - referring to radiation with wavelengths longer than those of red light; while invisible to the human eye, some photographic film is sensitive to it, and, when developed, indicates differences in heat production by the objects photographed; such film can be used in aerial photography to detect septic system activity near the ground surface.

Innovative wastewater treatment systems - methods of wastewater treatment not fully proven under the circumstances of their contemplated use, and that represent a significant advancement over the state of the art in terms of water conservation, reclamation, reuse, energy recovery, or cost reduction, as defined in 40 CFR 35, Appendix E.

Interceptor sewer - a sewer receiving flows from collector lines and carrying them to a central point for treatment and discharge.

Intermittent stream - a stream or a reach of a stream that flows only at certain times of the year.

Interstice - an opening or space, as in rock or soil.

Joint - a surface of actual or potential fracture or parting in a rock, without displacement.

KSA - Kansas Statutes Annotated, the codified laws of the State of Kansas.

Lagoon - a large pond in which wastewater is retained for primary and/or secondary treatment; discharging lagoons produce an effluent that according to Kansas law must contain no more than 30 mg/l BOD₅ and 80 mg/l suspended solids; non-discharging lagoons rely on evaporation for disposal of water.

Land application - wastewater treatment by the action of bacteria present in the soil following its application onto the surface of the ground; accomplished by overland flow, rapid infiltration, or slow infiltration; in Kansas, land application must be preceded by 90 days' storage.

Lateral field - absorption field for a septic tank.

Leach field - absorption field for a septic tank.

Leaching - the separation, selective removal, or dissolution of soluble constituents from a layer of rock or soil horizon by the action of percolating water; the similar removal of pollutants from wastewater percolating through soil by filtering and microbial processes.

LID - Marion County Lake Improvement District

Lift station - a small wastewater pumping station that lifts wastewater to a higher elevation when the continuance of the gravity sewer at reasonable slopes would involve excessive depths of trench.

Limestone - a carbonate sedimentary rock containing more than 95% calcite and less than 5% dolomite.

Loess - a shallowly buried layer of windblown dust of relatively recent geologic age; generally nonstratified, porous, unconsolidated and fine-grained, consisting predominantly of silt.

Macrophytes - aquatic plants possessing a multi-cellular structure with cells differentiated into specialized tissues. Their sizes range from near microscopic, e.g., duckweed, to massive cypress trees. Macrophytes can be divided into three major growth types: floating, submerged, or emersed.

Macroscopic - large enough to be perceived or examined by the unaided eye.

mgd - million gallons per day

mg/l - milligrams per liter; approximately equivalent to parts per million.

Mitigating measure - action taken to lessen or eliminate an adverse environmental impact.

Mixing zone - that portion of a stream from the point at which effluent is introduced, downstream to the point at which it is uniformly mixed with the receiving waters.

Multi-media filtration - process of passing water through a series of substances, usually some sort of granular material, for removal of suspended solids.

NEPA - National Environmental Policy Act of 1969.

Nitrite - substance released by some soil bacteria, toxic to many organisms and usually rapidly converted by other bacteria to nitrate, which is not toxic.

Nitrogen dioxide - toxic, corrosive, reddish-orange gas released into the atmosphere mainly through combustion of natural gas and coal and exhaust from motor vehicles.

Non-point-source discharge - general source of pollution not originating from a single controllable source, e.g., runoff from farmland.

Notice of Intent - announcement by a federal agency of its intent to prepare an EIS.

NPDES - National Pollutant Discharge Elimination System.

On-site systems - wastewater treatment systems in which the treatment is performed on the site where the wastes are produced. Examples include septic tanks with leach fields, composting toilets, etc.

Overland flow - method of land application in which wastewater is allowed to run down a grassy slope; treatment is by aerobic soil bacteria and plant uptake of nutrients; runoff is collected and discharged.

Package plant - a small wastewater treatment plant whose various components are contained within one structure, purchased and installed as a unit.

Particulates - minute, separate particles dispersed in the air, contributing to pollution; main sources are coal combustion, industrial processes, and forest fires.

Pathogen - disease-producing organism.

Percolation - movement of water through soil; empirically measured by a test in which a hole is drilled in the soil and soaked, then filled with water, and the rate of downward movement of the water surface recorded, given in minutes per inch; does not necessarily correlate directly to permeability.

Perennial stream - a stream or a reach of a stream that flows continuously throughout the year.

Permeability - quality of soil that permits it to transmit water; empirically measured by rate of downward movement of water through saturated soil cores; given in inches per hour; does not necessarily correlate directly to percolation.

pH - a measurement of hydrogen ion concentration; used as an expression of acidity and alkalinity on a scale whose values run from 0 to 14, with 7 representing neutrality, numbers from 7 to 0 increasing acidity, and numbers greater than 7 increasing alkalinity.

Physiographic province - any large geologic area or region considered as a whole, all parts of which are characterized by similar landform features or history, and differ significantly from those of adjacent areas.

Planning area - area covered by a Facilities Plan.

ppm - parts per million; approximately equivalent to milligrams per liter.

Point-source discharge - introduction of treated or untreated wastewater into a body of water at a discrete point of discharge, such as a pipe.

Primary impact - direct effect of an action.

Primary treatment - the first major process in most wastewater treatment plants; consisting of retaining wastewater in a tank long enough for solids to settle.

Prime agricultural land - land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops, and that is available for one of these uses; rated in Class I or II in SCS's agricultural capability classification system.

Privy - a small building fixed directly over a pit or vault, equipped with seating and used for collection of bodily wastes.

Province - an area that corresponds to a broad vegetation region, and that has uniform regional climate and the same type or types of zonal soils.

PVC - polyvinylchloride, a type of plastic from which some sewer pipe is made.

Range - land producing naturalized or native forage for animal consumption, and lands that are revegetated naturally or artificially to provide a forage cover that is managed like naturalized or native vegetation.

Rapid infiltration - a method of land application in which wastewater is sprayed onto a flat area with sandy (highly permeable) soils.

RCP - Reinforced Concrete Pipe; frequently used for large-diameter sewers.

Riparian woodland - an area of trees and other woody vegetation bordering a stream or lake.

Sandstone - a medium-grained sedimentary rock composed of sand-sized particles which are united by a cementing material.

Screen - a device with openings, generally of uniform size, used to retain or remove solids from wastewater.

SCS - Soil Conservation Service, a branch of the U.S. Department of Agriculture.

Secondary impact - an indirect effect of an action; for example, population growth induced by the existence of a proposed project.

Secondary treatment - removal of organic wastewater constituents, usually by microbial activity, following primary treatment (settling); a plant is recognized as providing secondary treatment if its effluent contains no more than 30 mg/l each of BOD₅ and suspended solids, or if at least 85% of BOD₅ and suspended solids are removed from the effluent, whichever is the stricter standard.

Section 201 - portion of Clean Water Act providing for federal assistance in the construction of municipal wastewater facilities.

Section 208 - portion of Clean Water Act providing for federal assistance in water quality management planning for counties or multiple-county areas; 208 plans are used to guide all county water pollution control efforts in accordance with federal, state, and local requirements.

Section 303(e) - section of Clean Water Act mandating continuous statewide water quality planning.

Sedimentation basin - a basin or tank in which wastewater is retained to allow suspended matter to settle out.

Septage - the accumulated scum and sludge from septic tanks or holding tanks.

Septic Snooper - a septic leachate detection instrument consisting of an underwater probe, a water intake system, an analyzer control unit, and a graphic recorder. Water from near the lakeshore is drawn through the instrument and continuously analyzed for specific fluorescence and conductivity. When calibrated against typical effluents, the instrument can detect and profile effluent-like substances and thereby locate septic tank leachate or other sources of domestic sewage entering the water body.

Septic tank - a component for partial on-site treatment of wastewater, usually for individual residences, by means of settling and decomposition by anaerobic microorganisms; must be paired with an absorption field for complete treatment.

Septic tank system - wastewater treatment system consisting of a septic tank and absorption field.

Service area - area intended to be served by a given wastewater facility.

Service - a single pipe, gate, valve, or similar means of connecting a water or sewer main with a house.

Shale - a fine-grained sedimentary rock formed by the consolidation of clay, silt, or mud, and characterized by a finely stratified structure.

Siliceous - rock containing abundant silica, especially free silica, such as quartz or chert.

Siltation - the accumulation by deposition of silt in a body of water.

Siltstone - a rock whose composition is intermediate between those of sandstone and shale.

Slow infiltration - method of land application in which wastewater is sprayed onto a flat area with silty or clayey (moderately permeable) soils; Kansas requires that the receiving area be cultivated.

Sludge - accumulated solids separated from liquids, such as water or wastewater, during treatment or processing.

Species - any group of fish, wildlife or plants which interbreeds when mature.

Species diversity - the number of different species occurring in some location or under some condition.

Step 1 - first stage of a project funded under EPA's Construction Grants program: development of a Facilities Plan.

Step 2 - second stage of a project funded under EPA's Construction Grants program: development of design drawings and specifications.

Step 3 - third stage of a project funded under EPA's Construction Grants program: construction.

Stratum (plural, strata) - a sedimentary bed or layer, visually separable from other layers.

Suspended solids (SS) - particles dispersed within, but not dissolved in, wastewater; if water is allowed to stand, suspended matter will eventually float to the top or settle to the bottom; dissolved matter (for instance, table salt or sugar) will not.

Synergism - cooperative action of discrete agents such that the total effect is greater than the sum of the effects taken independently.

Taxa (plural of taxon) - a group of organisms constituting one of the categories or formal units in taxonomic classification, such as phylum, order, family, genus, or species, and characterized by attributes in varying degrees of distinction.

Terrace - a large, step-like ledge breaking the continuity of a slope.

Turbidity - cloudiness of water brought about by the presence of silt or other suspended solids.

TSS - total suspended solids, see "suspended solids."

Upland forest - a plant community consisting predominantly of trees and other woody vegetation, found in the higher parts of a region or tract of land.

USDA - United States Department of Agriculture.

Uplift - a structurally high area produced by positive movements that raise or upthrust rocks, as in a dome.

Variance - a license to do some act contrary to the usual rule, generally applying here to a zoning ordinance.

VCP - Vitrified Clay Pipe; the most common type of sewer pipe.

Waste stabilization pond - a lagoon.

APPENDIX A

POPULATION PROJECTIONS

In the course of field investigations for this EIS, several data sources were consulted that seemed to indicate that estimating present and future populations in the Lake Improvement District was a more complex problem than it appeared in the Facility Plan. In particular, the problems associated with wastewater flows contributed by the many seasonal and weekend residents were apparently not addressed. This fact becomes important in analyzing yearly wastewater flows for total retention lagoon alternatives, and bears on all other alternatives to some extent. This Appendix presents a more detailed investigation of population in the LID using data gathered from a variety of sources, including the Marion County Appraiser's Office, records of the two electric companies serving the LID, and interviews with the Lake Superintendent.

In general, the reliability of projections of growth for small populations is always somewhat suspect. It is felt, however, that the projections presented in this EIS are based upon the best available data and reasonable assumptions and should provide a conservative basis for design.

1. Present Population

The population at the LID is composed of several groups, differentiated by the amount of time each year that the group resides at the lake and whether members in the group use the LID as their permanent or seasonal home or simply as a weekend recreational resource. Each group was evaluated in order to determine their specific characteristics. A summary of this evaluation follows.

a. Permanent Residents. This group includes those persons who own homes and reside at the lake on a year-round basis. The majority of these permanent residents are retired (41). According to the latest figures available from the Marion County Appraiser's Office,

there are currently 67 residences in the Lake Improvement District occupied on a year-round basis by 143 persons. Thus the present average persons per household figure is 2.13, which reflects the low number of children expected in a retirement community. Permanent residents are assumed to reside at the lake 365 days per year.

b. Seasonal Residents. This group includes those persons who own vacation homes in the LID. The types of seasonal units range from mobile homes and unimproved cabins to larger single-family cottages. Several cabins are no more than fishing shacks with privies and are scarcely used (42). Generally, the people owning summer and/or weekend homes have families with children or they are older couples who now are planning to make their seasonal home their retirement home in the future.

Assuming that the difference between the total number of dwelling units (see Table A-1) and the number of permanent units represents the number of seasonal units, there are presently 99 seasonal units at the lake. The large majority of seasonal residents have permanent homes in Wichita, so the average persons per household figure for the Wichita SMSA, 3.06 (43), was applied to the number of seasonal units, yielding an estimated 303 (99×3.06) seasonal residents within the LID.

According to records of monthly electrical usage, approximately 60% of the seasonal residents are continually in residence from April through November, or 240 days per year. The other 40% reside there an average of two weekends per month, year-round, or 48 days per year (44).

c. Campers. There are approximately one hundred (100) campsites that are used on the 21 non-holiday weekends between May and October, while three hundred campsites are used during the four-day holiday weekends (Memorial Day, Fourth of July and Labor Day) (45). At 3.5 persons per campsite, (the average number of persons per campsite estimated by the Corps of Engineers at the Marion Reservoir), the average number of campers camping at the Lake on holiday and regular weekends from May to October is assumed to be 1050 and 350, respectively.

TABLE A-1
DWELLING UNIT AND
POPULATION DATA

Year	Total ^a	Permanent ^a	Permanent ^a	Seasonal ^b	Seasonal ^c
	Units	Units	Population	Units	Population
1969	149	35	79	114	349
1970	150	32	71	118	361
1971	154	37	82	117	358
1972	155	45	107	110	337
1973	155	50	112	105	321
1974	157	51	116	106	324
1975	159	55	129	104	318
1976	163	54	124	109	334
1977	163	54	136	109	334
1978	163	61	140	102	312
1979	166	67	143	99	303

^a Data supplied by Marion County Appraiser's Office.

^b Obtained by subtracting number of permanent units from the number of total units.

^c Based upon an assumed 3.06 persons per seasonal dwelling unit.

d. Trailer Park Residents. There are 56 slots where trailers can be parked on the county park land. These slots are rented from the Lake Superintendent for periods of up to one year. All of the slots are rented each year to at least one tenant and in some cases one slot will be rented more than once a year. For instance, in 1978, the 56 slots were rented a total of 65 times (46).

The major use of the trailer park is on weekends, with more trailers in the park on summer weekends (May to October) than during the fall and winter months (November to April). According to the Lake Superintendent, from May to October there are between 15 and 25 trailers in the park on regular weekends and 25 to 35 trailers in the park on holiday weekends, and from November to April there are from 5 to 10 trailers there each weekend. For the most part, families with children tend to use the trailer park during the summer months whereas during the fall and winter months there are more likely to be retired couples at the park.

Table A-2 presents an estimate of the maximum number of people expected at the lake on the busiest day of the year. This peak day estimate is based upon the assumption that all members of each resident group would be at the lake on a summer holiday weekend. Table A-3 presents the total number of person-days spent at the lake over the entire year by each population group. This number is then divided by 365 to give the number of persons at the lake on an average day.

2. Population Projections

These projections are based on the assumptions that the permanent and seasonal populations will continue to grow at the same rate as they grew from 1969 to 1979; that the lake will remain a viable recreational resource through the year 2000; and, that any sewerage system provided in the LID through a federal grant will have associated with it sufficient land use controls to insure that no additional development will be induced beyond that which can be expected to occur without the project. The following methods were used to project the future populations of each subgroup at the lake.

TABLE A-2
CURRENT POPULATION ESTIMATE
PEAK DAY

Group	Units	Person per Unit	Population
Holiday Campers	300	3.50	1,050
Seasonal Residents	99	3.06	303
Permanent Residents	67	2.13	143
Seasonal Trailers	35	3.50	123
Peak Day Population			1,619

TABLE A-3
CURRENT POPULATION ESTIMATE
AVERAGE DAY

Group	Units	Persons per Unit	Population	Days/Yr.	Person- Days/Yr.
Holiday Campers	300	3.50	1050	12	12,600
Weekend Campers	100	3.50	350	46	16,100
Seasonal-Summer	59	3.06	181	240	43,440
Seasonal-Weekend	40	3.06	122	48	5,856
Permanent Residents	67	2.13	143	365	52,195
Seasonal Trailers:					
(Summer Wkd.)	20	3.50	70	46	3,220
(Holiday Wkd.)	30	3.50	105	12	1,260
(Winter Wkd.)	10	2.50	25	52	1,300
Total Person-days per Year					135,971
Average Persons per Day		373			

a. Permanent and Seasonal Residents. A linear regression model was calibrated on the data for the number of total and permanent dwelling units from 1969 to 1979, and projections were made of total and permanent dwelling units in the years 1985, 1990, 1995 and 2000. The number of seasonal units was obtained by subtracting the projected number of permanent units from the projected number of total units. High correlation coefficients were obtained for both regression models. Table A-4 presents these projections.

The average persons per permanent household figure from 1969 to 1979 of approximately 2.29 was used to convert the projected number of permanent units to population. While this figure is low by national, state, or county standards, it does accurately reflect the nature of the LID as a predominantly retirement community with a low number of families with children. The average persons per household figure for the Wichita SMSA of approximately 3.06 was used to convert the number of seasonal units to population. As was assumed for the present day population estimates, it was assumed that 40% of the future seasonal residents would stay at the lake for an average of 48 days (2 weekends/month) and that 60% would be continually in residence from April through November, or 240 days.

TABLE A-4
PROJECTED PERMANENT AND SEASONAL POPULATION

<u>Year</u>	<u>Permanent</u>		<u>Seasonal</u>	
	<u>Units</u>	<u>Population</u>	<u>Units</u>	<u>Population</u>
1985	84	194	92	282
1990	100	230	84	257
1995	116	267	77	236
2000	132	302	69	211

b. Trailer Park Residents. Before 1977 there were 70 slots within the trailer park that were available for use. Since 1977 the

pattern of slots has been rearranged and now only 56 slots exist. In order to take into account any future rearrangement, it was assumed that 70 slots would be available for use by the year 2000. The peak number of seasonal trailers occupied per day is projected to be 38, based upon a continuation of the current peak period occupancy rate of 62.5 percent.

This technique was used for all the categories of seasonal trailers. It was also assumed that the number of days per year the slots were filled and the number of persons per trailer would remain constant.

c. Campers. Since the large majority of campers at Marion County Lake come from the Wichita area, it was assumed that the future number of campers at the lake would be a function of the population growth of the Wichita SMSA. The Wichita area is expected to grow at the rate of 1.5 percent per year (47), and this growth rate was applied to both the present holiday and weekend figures to produce projections for the year 2000.

d. Total Population. Composite projections for all population subgroups for the peak day in the year 2000 are presented in Table A-5, and projections for the average day are presented in Table A-6. A summary of peak and average day figures for the years 1979 and 2000 are presented in Table A-7. These projections were used as the basis for design of the alternatives developed in this EIS.

TABLE A-5
POPULATION PROJECTION
PEAK DAY - YEAR 2000

Group	Units	Person per Unit	Population
Holiday Campers	405	3.50	1418
Seasonal Residents	69	3.06	211
Permanent Residents	132	2.29	302
Seasonal Trailers	44	3.50	154
Peak Day Population			2085

TABLE A-6
POPULATION PROJECTION
AVERAGE DAY - YEAR 2000

Group	Units	Persons Per Unit	Population	Days/Yr.	Person- Days/Yr.
Holiday Campers	405	3.50	1,418	12	17016
Weekend Campers	135	3.50	473	46	21758
Seasonal-Summer	41	3.06	125	240	30000
Seasonal-Weekend	28	3.06	86	48	4128
Permanent Residents	132	2.29	302	365	110230
Seasonal Trailers:					
(Summer Wkd.)	25	3.50	88	46	4048
(Holiday Wkd.)	38	3.50	133	12	1596
(Winter Wkd.)	13	2.50	33	52	1716
Total Person-days per Year					190492

Average Persons per Day 522

TABLE A-7
POPULATION PROJECTION SUMMARY

<u>Year</u>	<u>Peak Day Population</u>	<u>Average Day Population</u>
1979	1619	373
2000	2085	522

APPENDIX B
HYDROLOGY, GEOLOGY, AND SOILS

1. Climate

Marion County climate is humid continental, with long hot summers and short cold winters.

Rainfall occurs in all months of the growing season. Heaviest rainfall occurs in June, and 73% of the total falls between April and September. Snow cover averages 18 to 20 inches, and is of short duration. It is not unusual for wet and dry years to alternate. The 1930's were dry, and resulted in "dust bowl" conditions. Wide variations in rainfall occur. The normal annual average from 1937 to 1946 was 30.13". The pre-1930 average was 31.31". The 13-year average from 1966 through 1978 is 33.42". Recorded extremes range from 49.31" in 1967 to 22.29" in 1921. The Corps of Engineers used 37.77" for their reservoir studies. A major rainstorm occurred in 1951 when 10.16" of rainfall fell between July 9 and 13.

Temperatures are typical of a mid-latitude continental location. Mean monthly average is 30.5° in January, and 80.0° in July; the mean annual average is 56°. The extremes range from 118° to -32°. Winter cold waves occur, with high winds from the north and below-zero temperatures, while spring and fall are cool and windy. July and August droughts are common. Local hail storms and tornadoes occur. Winds are northerly from December to February, and become strong southerly winds for the rest of the year. Average annual wind speed is 13.7 mph, with 61% being in the 8 to 18 mph range.

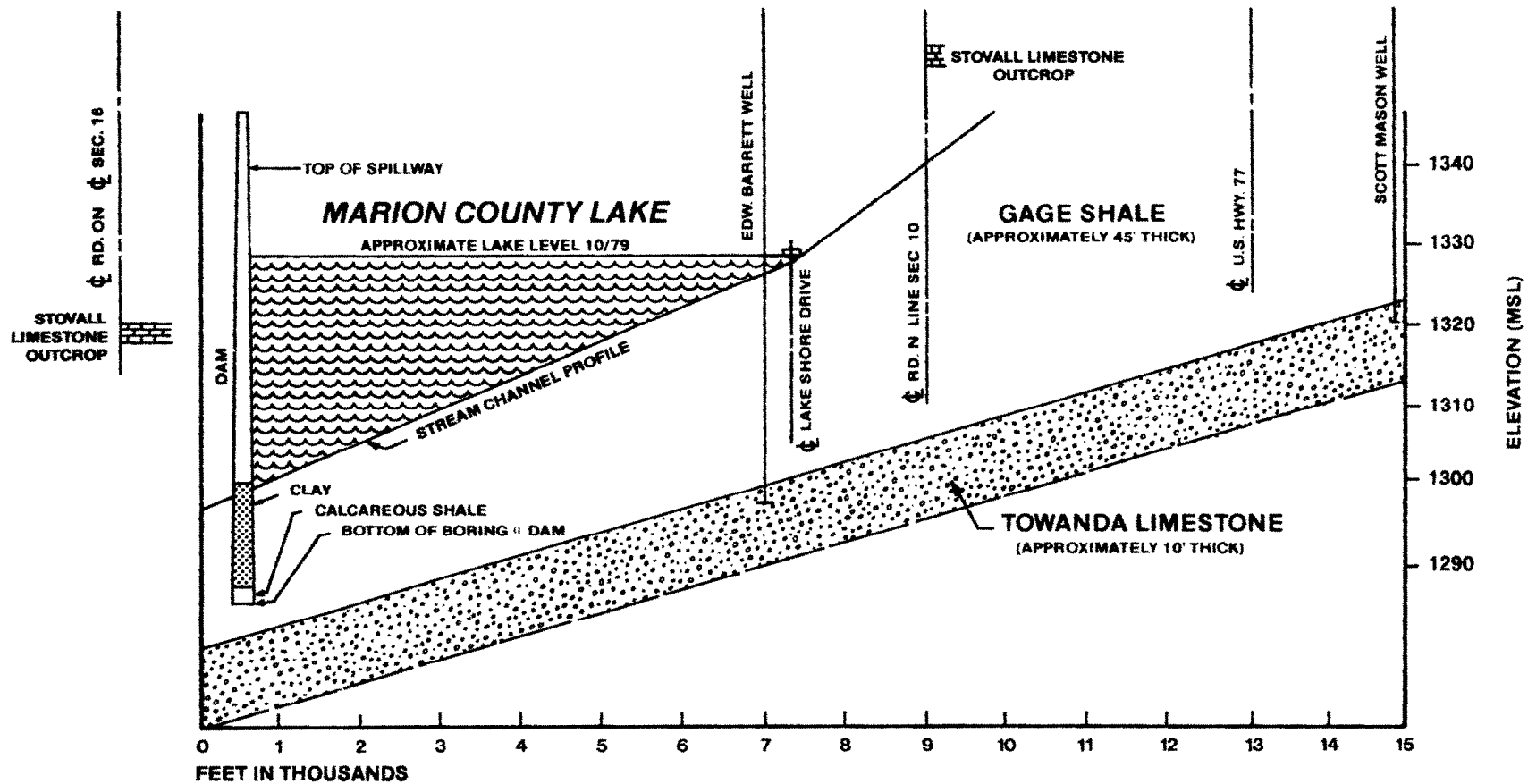
Frost damage to crops is rare. Average dates of first and last killing frosts are October 18 and April 18. Earliest and latest dates of record are September 20 and May 20.

Evaporation rates for a dry year range from a high maximum of 16.21" in July to a low maximum of 2.39" in January. For a normal year the maximum is 10.40" in July and a minimum of 1.92" in January. The average is 6.26" occurring in July.

2. Groundwater Resources

According to the Kansas Geological Survey, no extensive aquifers exist in consolidated sedimentary rock within the study area. The local aquifer is restricted to the interstices near the contact zone between the Gage Shale and the Towanda Limestone formations. The groundwater table prior to 1938, the year in which the Marion County Lake dam was constructed, was in the joints and crevices of the lower portion of the Gage Shale. Four wells drilled before 1938, and ten wells drilled between 1975 and 1978 were all drilled into the top of the Towanda Limestone at depths from 60 to 120 ft. Yields are reported to be on the order of 20 to 30 gpm. The average depth of wells reaching the Towanda Limestone in the lake area is 75-ft. Surface elevations of wells were obtained from USGS quadrangle sheets and are 1350-1370 MSL; therefore, the top of the Towanda Limestone is probably at about 1280-ft MSL at the dam and about 1300-ft MSL at the upper end of the lake.

The Towanda Limestone formation, the local aquifer for wells in the Marion County Lake region, is shown on Figure B-1. Although the Towanda was not identified in outcrop in this study, its stratigraphic position and approximate elevation was determined from a combination of data. The Kansas Geological Survey states that the thickness of the Gage Shale is 45 ft. This shale overlies and separates the Towanda Limestone from the Stovall Limestone above. The Stovall Limestone was located and identified in outcrop at the lake-feeding tributary on the road on the north line of Section 10-T20S-R4E and below the dam on the N-S road through the center of Section 16, as well as locations on the lake shore. Elevations of these two outcrops were obtained from the USGS Topographic map. At the Section 10 outcrop the elevation of the Stovall is taken as 1350 MSL while below the dam it is 1320 MSL. Subtracting 45 ft for the Gage Shale thickness, the top of the Towanda Limestone at these locations would be 1305 and 1275 MSL. The creek channel profile from USGS map elevations is from 1340 MSL at the Section 10 road and 1299 MSL at the dam centerline. This places the top of the Towanda about 20 ft below the base of the dam. The profile



SOURCE OF DATA: OBSERVED OUTCROPS, BORINGS @
DAM, 2 WELL BORING LOGS

SUBSURFACE PROFILE ALONG OLD STREAM CHANNEL IN MARION COUNTY LAKE

Figure B-1
Profile of Local Aquifer

is substantiated by the absence of limestone in the borings for the dam and by the logs of wells at the Scott Mason location in the NW $\frac{1}{4}$ SW $\frac{1}{4}$ Sec. 2 and at the Edward Barrett location in the SW $\frac{1}{4}$ NW $\frac{1}{4}$ Sec. 10. Other wells in the vicinity of the lake and Norman Bower's report (48) show a slightly lesser dip of the Towanda. In any event, all data places the top of the Towanda Limestone ten or more feet below the channel of the tributary creek forming Marion County Lake.

There does not seem to be any connection between surface water and the groundwater aquifer on top of the Towanda Limestone formation, at least above the Marion County Lake dam. The approximate 45-ft thickness of the Gage Shale above the Towanda Limestone acts as a barrier to prevent downward percolation from surface to the aquifer.

3. Surface Water Resources

The surface waters of the study area are limited to the Lake, the creek that feeds the lake, and farm ponds constructed on intermittent tributaries. West of the study area is the Cottonwood River. Mud Creek and Clear Creek join north of Marion and flow through the city to join the Cottonwood. The South Fork and the North Fork of the Cottonwood River join about three miles west of Marion. The North Fork has been dammed by the Corps of Engineers to form Marion Reservoir. The Corps has also constructed a floodway consisting of a levee and a diversion channel to keep Mud Creek from flooding downtown Marion.

The Marion municipal water supply is obtained from Mud Creek. During periods of low water, the supply is augmented from a well, and rationing procedures are invoked. Water for livestock is usually supplied by farm ponds built on intermittent streams. Several such ponds supporting herds of cattle are in the watershed above Marion County Lake, and drain into the lake. Runoff from these areas is a definite source of pollution in the lake.

4. Flooding Potential

The area surrounding the lake within what appears to be the 1330 MSL contour has been classified by HUD as Special Flood Hazard Area Zone A. This is defined as "Special Flood Hazard Areas inundated by the 100-year flood, determined by approximate methods; no base flood elevations shown or flood hazard factors determined (49)." This contour is within the lake perimeter road (Lake Shore Drive) and is close to the shoreline at the lower half of the lake. The elevation of the top of the dam is 1346 MSL and the spillway is 1339 MSL.

5. Topography

The study area is in the western portion of the Flint Hills Upland of the Central Lowlands Physiographic Province. The area is underlain by shales, and by limestones with siliceous zones in the form of chert. Topography is governed by weathering of the bedrock, with differential erosion resulting in rolling relief. In this portion of Kansas, the topography is gently rolling, with gentle to moderate slopes punctuated by incised stream valleys and exposures of limestone ledges, especially in the stream valleys and road cuts. Where cherty limestone is near or at the surface, the slopes are generally less than one percent. Steeper slopes border the stream valleys. Topography is nearly level in the valley of the Cottonwood River and its major tributaries.

Marion County is within the Mississippi River Basin drainage area. Regional drainage in this part of Kansas is to the south and southeast via the Cottonwood River flowing into the Neosho and Grand Rivers, joining the Arkansas River in Oklahoma. Marion County Lake was formed by damming an unnamed tributary of the Cottonwood River. The drainage area above the dam is about 6.5 square miles.

Elevations in the lake area range from 1460 feet above mean sea level (MSL) in Sections 25 and 26-T19S-R4E in the northeast part of the drainage area to 1270 feet MSL where the tributary below the dam enters the Cottonwood River in Section 28-T20S-R4E.

6. Geology

Surficial bedrock in the Marion area is comprised of shales and limestones of Permian age. The rocks dip to the west at about 15 feet per mile off the western flank of the Nemaha ridge, a major anticlinal subsurface structure extending north-south across eastern Kansas.

Bedrock formations near the surface or outcropping in the area in descending order of age and with their outstanding characteristic and estimated thicknesses are shown in Figure B-2 and described as follows:

Odell Shale - varicolored - 30 ft thick

Winfield Limestone Group - 40 ft thick

Cresswell Limestone - concretions and geodes -
also locally quarried - 30 ft

thick

Grant Shale - olive to buff - 8 ft thick

Stovall Limestone - large chert nodules - 2 ft thick

Doyle Shale Group - 80 ft thick

Gage Shale - varicolored - 45 ft thick

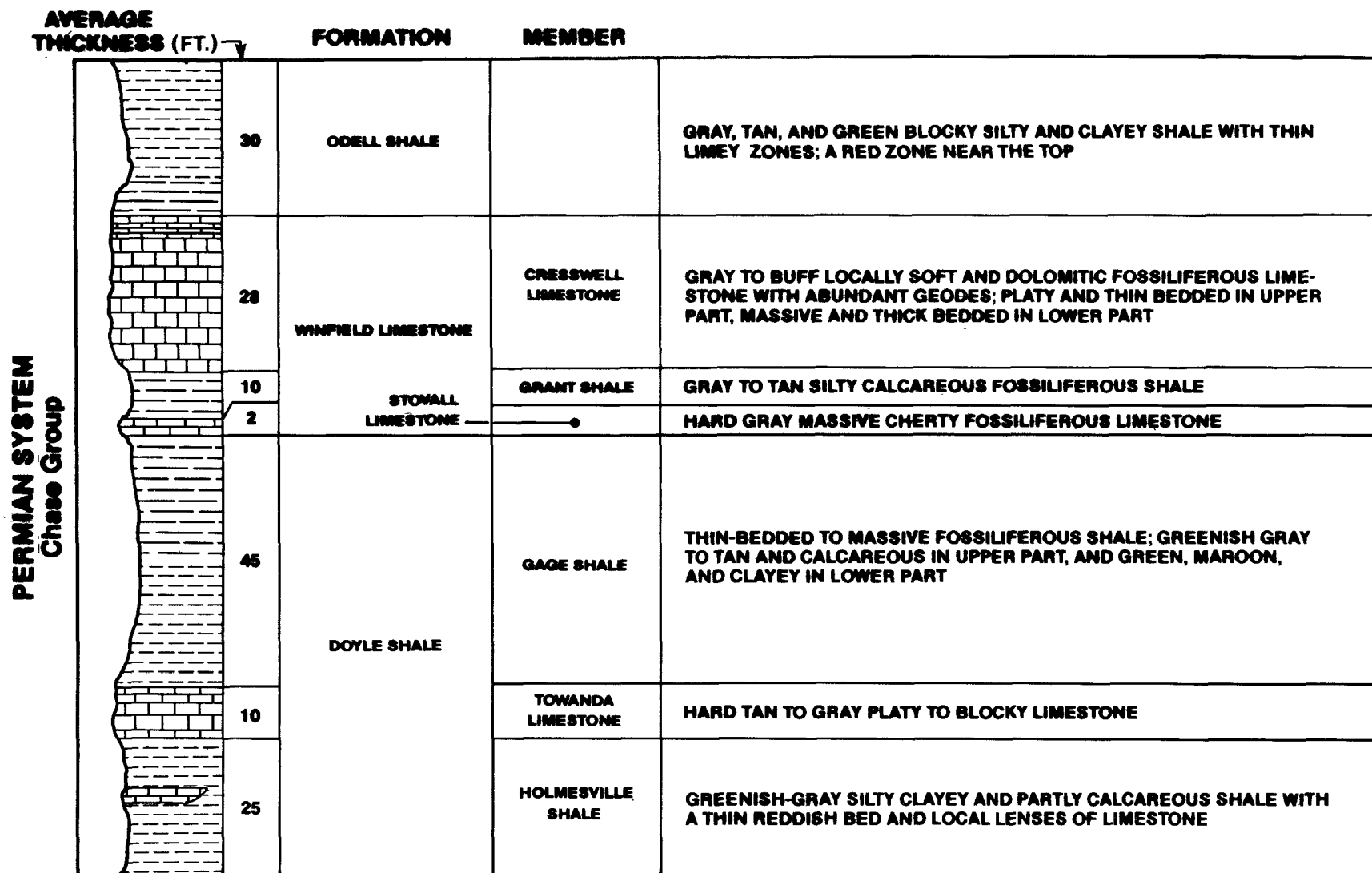
Towanda Limestone - thin beds, flaggy - 10 ft thick

Holmesville Shale - thin bedded, calcareous - 25 ft
thick

Unconsolidated Quaternary deposits are in the valley downstream of the dam, and consist of slope wash and gravity-type deposits containing silty clays, chert and limestone gravel (Sanborn formation) and silty terrace deposits.

7. Mineral Resources

Mineral production in Marion County was valued at \$3,338,000 in 1974. Petroleum, stone and natural gas in order of value are the principal mineral resources. Most of the oil production is from the Lost Springs field which begins about 4 miles north of Marion and



SOURCE: USGS BULLETIN 1060

Figure B-2
Generalized Geologic Column

continues north to Herington. This is the nearest production to the project area. The Stenzel field, about 3 miles west southwest of Marion, and the Robinson field, about 8 miles east southeast of Marion, are abandoned gas fields. The latest available production figures for Marion County are from 1977 and show 373,766 barrels of oil produced from 559 wells and 956,000 M cu ft of gas produced from 78 wells. The Peabody and Florence oil fields, located near these cities to the south and southeast of the project area, declined about 1930, having been producing since 1918. Some of the stripper wells are producing by secondary recovery methods. It has been reported that there is some current drilling activity around Florence, about 5 miles southeast of the project area.

Crushed stone is produced by the Hallett Construction Co., with quarries in the southeast quarter of Section 4 and the northeast quarter of Section 6-T21S-R4E, and by the Sunflower Crushed Stone Co., with a quarry in the southeast quarter of Section 6-T21S-R5E. No production figures are available.

8. Soils

Soil suitability is one of the major factors affecting alternatives to existing wastewater treatment and sewage disposal systems. Information on soil suitability is provided by the Soil Conservation Service (SCS) of the U.S. Department of Agriculture, through published county soil surveys. The Marion County Soil Survey was last published in 1930. An updated county soil survey is in process and is scheduled for completion about 1981, but limited soils data is available for the study area. SCS provides soil suitability data including permeability, depth to bedrock, drainage, slopes, depth to high groundwater, and engineering properties.

Soils in the Marion County Lake area are mostly silty clays developed by weathering and erosion of the underlying limestone and shale deposits. Soil cover is generally thin, especially over the limestones. The major soil associations found in the study area are shown on Figure B-3 and are described below.

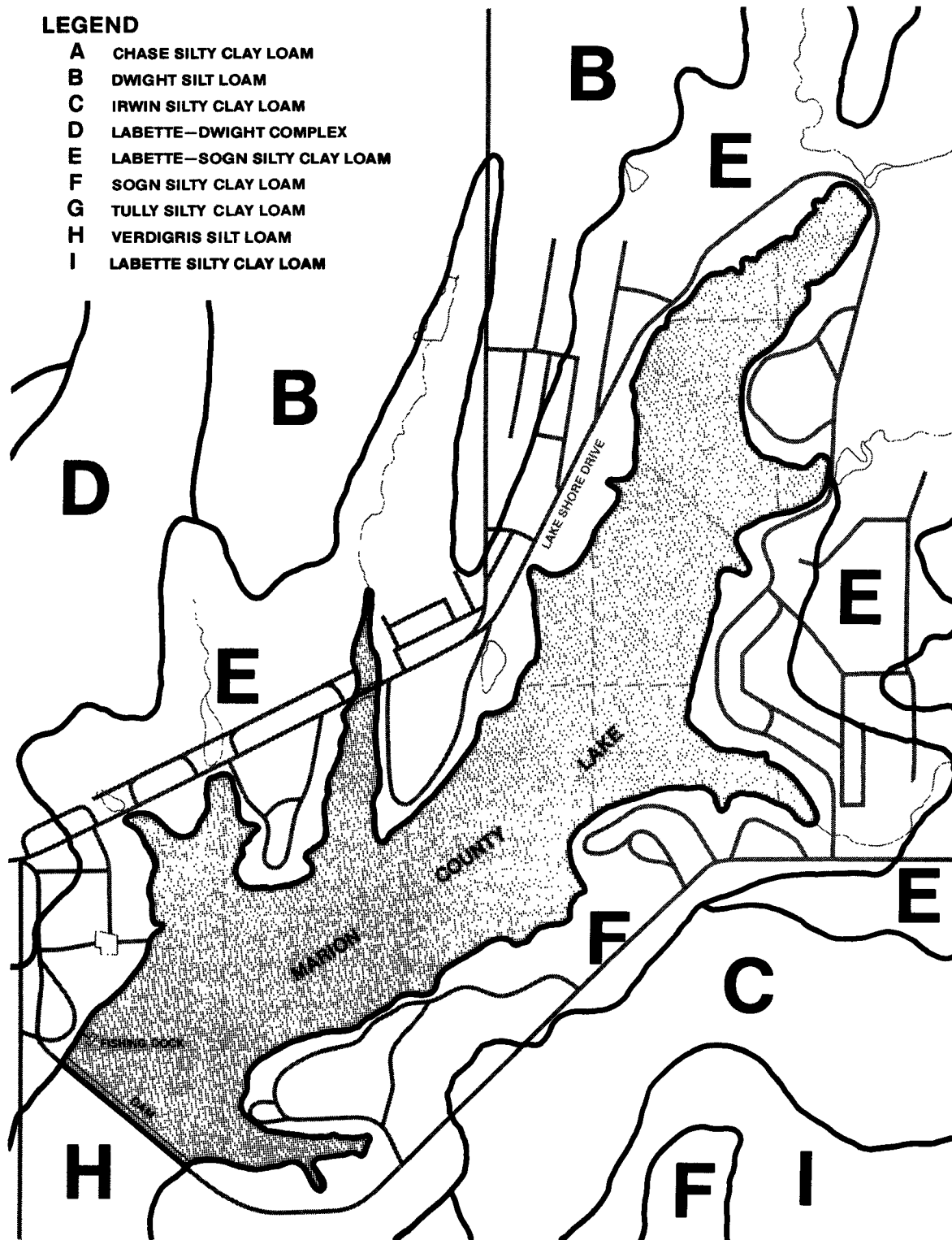
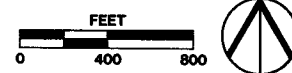


Figure B-3
Soil Associations



Chase silty clay loam is formed in clayey alluvium on low terraces of larger streams. This soil is moderately well to poorly drained, and is slowly permeable. It is subject to occasional brief flooding. Depth to rock is greater than 5-ft, and depth to perched high water table is from 1 to 3 feet.

Dwight silt loam is formed from clay shales with possible mixture of loess and old alluvium. It is moderately well drained and permeability is very slow. Occasional small depressional areas may pond water for several days. The soil is fine textured over hard cherty limestone and is found on upland divides with slopes of less than four percent.

Irwin silty clay loam is formed from clay shales or old alluvium over hard limestone. The soil is moderately to well drained and permeability is very slow. It is found on uplands with slopes up to eight percent, but averaging less than three percent.

Labette - Dwight complex is a silt to silty clay soil formed from limestone containing thin beds of clay shale. Depth to bedrock is from 20 to 40 inches. The soil is well drained and permeability is slow. This soil is found on nearly level uplands, with slopes ranging from one to eight percent.

Labette - Sogn silty clay loam is a silty clay formed from residuum weathered from underlying limestone. Depth to bedrock is less than 40 inches. The soil is somewhat excessively drained, with medium or rapid runoff, and permeability is moderate.

Sogn silty clay loam is a shallow soil formed from the weathering of limestone. Depth to bedrock is from 10 to 20 inches. The soil is somewhat excessively drained with medium or rapid runoff and permeability is moderate. It is normally found on slopes of less than three percent, but ranges up to moderately steep slopes of up to 15 percent.

Tully silty clay loam is formed at the toes of slopes in areas where soils have been formed in residuum from interbedded limestone and shale. Slopes range from two to seven percent, and range up to 15 percent. The soil is well drained, and runoff is medium to rapid. Permeability is slow.

Verdigris silt loam is deep, well to moderately drained soil formed in silty alluvium, and is found in the flood plains. Depth to bedrock exceeds five feet. Slope gradient is commonly less than one percent, ranging up to two percent. Runoff is slow to medium and permeability is moderate. This soil is occasionally flooded.

Labette silty clay loam is formed on nearly level to sloping uplands weathered from underlying limestone and interbedded clayey shales. Slopes range from one to eight percent. Depth to bedrock is about 36 inches. The soil is well drained with medium to rapid runoff and permeability is slow becoming very slow with depth.

Limitations for septic tank leach fields and sewage lagoons for various soils are rated as having slight, moderate, or severe limitations. "Soils with slight limitations are good for seepage fields, and only minimal expenditures are required for safe effluent disposal without environmental hazards. Soils with moderate limitations have some undesirable properties; careful planning and design of seepage fields are needed in these areas to compensate for the limitations imposed by the soils. Soils with severe limitations have problems for seepage fields that are difficult to overcome: slow permeability, shallowness to bedrock, wetness, flooding, slope, stoniness, or some other unfavorable soil property." The criteria for these limitation classifications are shown in Table B-1.

The limitations for sewage purposes of the area soils are shown on Table B-2.

The prime farmland inventory indicates that Irwin, Chase, Verdigris and Tully series soils are designated as prime or unique agricultural land. The "no action" alternative or only those alternatives having the least impact should be considered for implementation in these prime farmland areas.

9. Geologic Constraints on Sewerage Alternatives

a. Excavation. Excavation will encounter firm rock at depths of less than five feet over most of the study area. Excepted areas are in Irwin, Tully, Chase and Verdigris soils. Irwin soils are on the uplands near the drainage divides and are underlain by shale. Tully soils are limited in area, and are found below the dam. Chase

TABLE B-1
SOIL LIMITATIONS CRITERIA

Septic Tank Seepage Field Rating

	<u>Slight</u>	<u>Moderate</u>	<u>Severe</u>
Percolation Rate	faster than 45 min/in	45-60 min/in	slower than 60 min/in
Depth to Water Table	over 72"	40" - 72"	under 48"
Flooding	none	rare	occasional or frequent
Slope	0-8%	8-15%	over 15%
Depth to bedrock	over 72"	48"-72"	under 48"

Sewage Lagoon Rating

	<u>Slight</u>	<u>Moderate</u>	<u>Severe</u>
Permeability	Under 0.6 in/hr	0.6-2.0 in/hr	over 2.0 in/hr
Depth to Water Table	under 60"	40"-60"	under 40" ¹
Flooding	none	none	subject to flood ²
Slope	under 2%	2-7%	over 7%
Depth to bedrock	over 60"	40"-60"	under 40"
Unified classification	GC,SC,CL,CH	GM,ML,SM,MH	GP,GW,SW,SP,OL,OH,PT

1. Disregard depth to water if floor is 2-ft thickness of impervious material.
2. Disregard flooding if floodwater has low velocity, depth under 5-ft, and is not likely to enter or damage lagoon embankment.

TABLE B-2

SOIL LIMITATIONS FOR SEWAGE DISPOSAL

<u>Soil Series</u>	<u>Septic Tank</u>	<u>Lagoon</u>
Chase	Severe, slow permeability	Moderate, some flooding
Dwight	Severe, slow permeability	Moderate, bedrock 40"-60"
Irwin	Severe, slow permeability	Slight, slopes under 2% Moderate, slopes 2-7% Severe, slopes over 7%
Labette-Dwight	Severe, slow permeability, bedrock 20"-40"	Severe, bedrock 20"-40"
Labette-Sogn	Severe, slow permeability bedrock 20"-40"	Severe, bedrock 20"-40"
Sogn	Severe, bedrock 10"-20"	Severe, bedrock 10"-20"
Tully	Severe, slow permeability	Slight, slopes under 2% Moderate, slopes 2-7% Severe, slopes over 7%
Verdigris	Moderate to severe, occasional flooding	Severe, frequent flooding

and Verdigris soils are in the tributary creek valley below the dam, and are subject to flooding by backwater from the Cottonwood River.

b. Lagoon Construction. None of the soils in the study area are conducive to lagoon construction. Most are less than five feet thick above bedrock, and have low strength and high shrink-swell characteristics. Verdigris soils are subject to flooding and to piping, a subsurface erosive phenomenon. Chase soils are difficult to compact. Dwight and Verdigris soils are easily eroded, as are the other soils to a somewhat lesser degree. Embankment erosion protection is required for all soils of the area. Grasses are not satisfactory for protection from wave action. Most of the soils percolate slowly to very slowly and are, therefore, suitable for water containment.

c. Surface Discharge. Any surface discharge within the drainage basin above the dam will eventually enter the lake. The silty clay soils intensify runoff and the subsurface shales are relatively impervious so that any downward seepage which may intersect the shale beds will be directed down the stratigraphic dip to the west. The areas on the west side of the creek valley and the area below the dam will not discharge into the lake. The Towanda Limestone, the local aquifer, is separated from the lake bed by more than 10 ft of impervious shale and lake sediments, and is not likely to be contaminated by lake pollutants, should they exist.

d. Land Application. Soils in the study area, except Dwight silt loam, Labette-Dwight complex, Labette-Sogn silty clay loam and Sogn silty clay loam are suitable for agricultural irrigation using treated wastewater. This type of irrigation has not been practiced in the area except for watering the Marion golf course and the grounds around the airport. Not many crops are planted outside of the floodplain areas. Rangeland grass is the major ground cover in the project area, and is used extensively for cattle grazing.

e. Treatment Plant Sites. The two proposed plant location sites near the Cottonwood River in the SE corner of Section 5 and the SW corner of Section 9, as shown in the Facility Plan, are in Irwin soils. The ratings for sewage lagoons in this soil depend upon the slope of the land, ranging from slight for 0-2% slopes to severe for

slopes exceeding 7%. Maximum slope at these locations is about 4% so the rating is slight to moderate. The well drained soils are about 6 ft thick over hard limestone. Both sites are satisfactory from a soils standpoint. The proposed alternative site of the regional plant is in the SW $\frac{1}{4}$. Sec. 4-T20S-R4E, where most of the soils are Dwight. They occur on the upland divides and are moderately well drained. Permeability is very slow. This site is on the west side of the airport property, and any discharge would enter a tributary of the Cottonwood River to the south and west of the Lake. The soil material is rated by SCS as having low strength for foundations, but hard limestone is less than 5-ft below the surface. The location is convenient for both the City of Marion and the lake area. Pipe lines would encounter rock excavation over much of the force main route.

An alternative site investigated by the EIS is below the dam, in Verdigris soils and the flood plain of the tributary. The dam has noticeable seepage, and road cracks on the crest of the dam indicate some weakness. Verdigris soils are well drained, with slow to medium runoff and moderate permeability. The soil has low strength for construction, and is subject to piping, a subsurface erosion phenomenon. The location in the flood plain is also subject to flooding by backwater from the Cottonwood River. The area is presently under irrigated cultivation. The location is convenient but not desirable for the above reasons.

f. Cluster Tanks & Community Leach Fields. All soils in the project area are rated as severe for septic tank systems except the Verdigris, which is below the dam. Because of this rating, some other means of treatment should be used, although it appears that most of the septic tank systems are working at the present time. The installation of holding tanks usually involves rock excavation because rock is near the surface in the study area. Cluster tanks with grouped or common leach fields may be a viable alternative. In order to construct these, it probably will be necessary to use a mound type, whereby the leach field is constructed on or above existing ground and suitable soil encloses the tile laterals within the leach field.

APPENDIX C

FLORA AND FAUNA

The following vegetation was observed in the project area:

TREES

<u>Common Name</u>	<u>Scientific Name</u>
Boxelder	<u>Accer negundo</u>
Hackberry	<u>Celtis occidentalis</u>
Redbud	<u>Cercis canadensis</u>
Green Ash	<u>Fraxinus pennsylvanica</u>
Honey Locust	<u>Glenditsia triacanthos</u>
Black Walnut	<u>Juglaus nigra</u>
Red Cedar	<u>Juniperus virginiana</u>
Osage Orange	<u>Maclura pomifera</u>
Red Mulberry	<u>Morus rubra</u>
Eastern Cottonwood	<u>Populus detoides</u>
Bur Oak	<u>Quercus macrocarpa</u>
Black Willow	<u>Salix nigra</u>
American Elm	<u>Ulmus americana</u>
Red Elm	<u>Ulmus rubra</u>

SHRUBS AND WOODY VINES

False Indigo	<u>Amorpha fruticosa</u>
Smooth Sumac	<u>Rhus glabra</u>
Poison Ivy	<u>Rhus radicans</u>
Wild Gooseberry	<u>Ribes missouriensis</u>
Prairie Rose	<u>Rosa suffulta</u>
Black Raspberry	<u>Rubus occidentalis</u>
Greenbriar	<u>Similax hispida</u>
Coralberry	<u>Symphoricarpos orbiculatus</u>
Wild Grape	<u>Vitis sp.</u>

HERBS

<u>Common Name</u>	<u>Scientific Name</u>
Pigweed	<u>Amaranthus retroflexus</u>
Ragweed	<u>Ambrosia</u> sp.
Big Bluestem	<u>Andropogon gerardi</u>
Little Bluestem	<u>Andropogon scoparium</u>
Three-awn Grass	<u>Artistida oligantha</u>
Drummond Aster	<u>Aster drummondi</u>
Tall White Aster	<u>Aster simplex</u>
Stick Tight	<u>Bidens</u> sp.
Sideoates Grama	<u>Bouteloua curtipendula</u>
Purple Thistle	<u>Cirsium altissimum</u>
Horseweed	<u>Ceniza canadensis</u>
Queen Anne's Lace	<u>Daucus carota</u>
Spike Rush	<u>Eleocharis</u> sp.
Wild Rye	<u>Elymus canadensis</u>
White Snakeroot	<u>Eupatorium rugosum</u>
Snow-on-the-Mountain	<u>Euphorbia marginata</u>
Sunflower	<u>Helianthus</u> sp.
Jerusalem Artichoke	<u>Helianthus tuberosa</u>
Ground Cherry	<u>Physalis heterophylla</u>
Pokeberry	<u>Phytolacca americana</u>
Smartweed	<u>Polygonum</u> sp.
Pale Dock	<u>Rumex altissimus</u>
Mad-dog Skullcap	<u>Scutellaria laterifolia</u>
Nettle	<u>Solanum</u> sp.
Goldenrod	<u>Solidago</u> sp.
Indian Grass	<u>Sorghastrum nutans</u>
Tall Stinging Nettle	<u>Urtica procera</u>
Ironweed	<u>Veronia baldwinil</u>
Cockle Bur	<u>Xanthum speciosum</u>

<u>Common Name</u>	<u>Scientific Name</u>
Curlycup Gumweed	<u>Grindelia squarrosa</u>
Blazing Star	<u>Liatris punctata</u>
Prairie Coneflower	<u>Ratibida columnaris</u>
Wild Alfalfa	<u>Psoralea tenuiflora</u>
Purple Prairie Clover	<u>Petalostemon purpureus</u>
Blue Wild Indigo	<u>Baptisia australis</u>

SHORELINE AND AQUATIC PLANTS

Coontail	<u>Ceratophyllum demersum</u>
Leafy Pondweed	<u>Potamogeton foliosus</u>
Largeleaf Pondweed	<u>Potamogeton amplifolius</u>
Longleaf Pondweed	<u>Potamogeton nodosus</u>
Sedges	<u>Carex</u> sp.
Cat-tail	<u>Typha latifolia</u>
Filamentous Green Algae	<u>Spirogyra</u> sp.
Southern Naiad	<u>Najas guadalupensis</u>

FAUNA KNOWN TO INHABIT THE MARION COUNTY LAKE AREA

FISH

Black Crappie	<u>Pomoxis nigromaculatus</u>
White Crappie	<u>Pomoxis annularis</u>
Gizzard Shad	<u>Dorosoma cepedianum</u>
Bluegill	<u>Lepomis macrochirus</u>
Channel Catfish	<u>Ictalurus punctatus</u>
Longeared Sunfish	<u>Lepomis megalotis</u>
Freshwater Drum	<u>Aplodinotus grunniens</u>
Northern Pike	<u>Esox lucius</u>

<u>Common Name</u>	<u>Scientific Name</u>
Mississippi Silversides	<u>Menidia audeus</u>
Spotted Bass	<u>Micropterus punctulatus</u>
Largemouth Bass	<u>Micropterus salmoides</u>
Grass Carp	<u>Ctenopharyngodon idella</u>
Carp	<u>Cyprinus carpio</u>
Black Bullhead	<u>Ictalurus melas</u>
Warmouth Sunfish	<u>Lepomis gulosus</u>
Golden Shiner	<u>Notemigonus crysoleucas</u>
Walleye	<u>Stizostedion vitreum</u>
Green Sunfish	<u>Lepomis cyanellus</u>
Red Shiner	<u>Notropis lutrensis</u>
Bluntnose Minnow	<u>Pimephales notatus</u>

AMPHIBIANS

Tiger Salamander	<u>Ambystoma tigrinum</u>
Plains Spadefoot Toad	<u>Scaphiopus bombifrons</u>
Great Plains Toad	<u>Bufo cognatus</u>
Woodhouse's Toad	<u>Bufo woodhousei</u>
Northern Cricket Frog	<u>Acris crepitans</u>
Spotted Chorus Frog	<u>Psuedacris clarki</u>
Striped Chorus Frog	<u>Psuedacris nigrita</u>
Bullfrog	<u>Rana catesbeiana</u>
Leopard Frog	<u>Rana pipiens</u>
Western Narrow-mouthed Frog	<u>Gastrophryne olivacea</u>

REPTILES

TURTLES

Common Musk Turtle	<u>Stenotherus odoratus</u>
Yellow Mud Turtle	<u>Kinosternon flavescens</u>
Common Snapping Turtle	<u>Chelydra serpentina</u>

<u>Common Name</u>	<u>Scientific Name</u>
Ornate Box Turtle	<u>Terrapene ornata</u>
Painted Turtle	<u>Chrysemys picta</u>
Red-eared Turtle	<u>Psuedemys scripta</u>
Smooth Softshell Turtle	<u>Trionyx mutica</u>
Spiny Softshell Turtle	<u>Trionyx spinifera</u>

LIZARDS

Earless Lizard	<u>Holbrookia maculata</u>
Collared Lizard	<u>Crotophytus collaris</u>
Fence Lizard	<u>Sceloporus undulatus</u>
Horned Lizard	<u>Phrynosoma cornutum</u>
Common Five-lined Skink	<u>Eumeces fasciatus</u>
Sonoran Skink	<u>Eumeces obsoletus</u>
Six-lined Racerunner	<u>Cnemidophorus sexlineatus</u>
Slender Glass Lizard	<u>Ophisaurus attenuatus</u>

SNAKES

Eastern Ringneck Snake	<u>Diadophis punctatus</u>
Eastern Hognose Snake	<u>Heterodon platyrhynchos</u>
Western Hognose Snake	<u>Heterodon nasicus</u>
Blue Racer	<u>Coluber constrictor</u>
Coachwhip Snake	<u>Masticophis flagellum</u>
Black Rat Snake	<u>Elaphe obsoleta</u>
Bullsnake	<u>Pituophis melanoleucus</u>
Prairie Kingsnake	<u>Lampropeltis calligaster</u>
Speckled Kingsnake	<u>Lampropeltis getulus</u>
Red Kingsnake	<u>Lampropeltis doliata</u>
Plains Ground Snake	<u>Sonora episcopa</u>
Flat-headed Snake	<u>Tantilla gracilis</u>
Plains Black-headed Snake	<u>Tantilla nigriceps</u>
Yellow-bellied Water Snake	<u>Natrix erythrogaster</u>
Graham's Water Snake	<u>Natrix grahami</u>

<u>Common Name</u>	<u>Scientific Name</u>
Diamondback Water Snake	<u>Natrix rhombifera</u>
Northern Water Snake	<u>Natrix sipedon</u>
Northern Brown Snake	<u>Storeria dekayi</u>
Plains Garter Snake	<u>Thamnophis radix</u>
Red-sided Garter Snake	<u>Thamnophis sirtalis</u>
Western Ribbon Snake	<u>Thamnophis proximus</u>
Lined Snake	<u>Tropidoclonium lineatum</u>
Western Massasauga	<u>Sistrurus catenatus</u>
Prairie Rattle Snake	<u>Crotalis viridis</u>

BIRDS (Residents)

Pied-billed Grebe	<u>Podilymbus podiceps</u>
Great Blue Heron	<u>Ardea herodias</u>
Green Heron	<u>Butorides virescens</u>
Pintail Duck	<u>Anas acuta</u>
Turkey Vulture	<u>Cathartes aura</u>
Red-tailed Hawk	<u>Buteo jamaicensis</u>
Sparrow Hawk	<u>Falco sparverius</u>
Bobwhite Quail	<u>Colinus cupido</u>
Rio Grande Turkey*	<u>Meleagris gallopavo</u>
Greater Prairie Chicken	<u>Tympanuchus cupido</u>
Mourning Dove	<u>Zenaidura macroura</u>
Killdeer	<u>Charadrius vociferus</u>
Woodcock	<u>Philohela minor</u>
Upland Plover	<u>Bartramia longicauda</u>
Western Meadowlark	<u>Sturnella neglecta</u>
Yellow-billed Cuckoo	<u>Coccyzus americanus</u>
Dickcissel	<u>Spiza americana</u>
Barn Owl	<u>Tyto alba</u>
Screech Owl	<u>Otus asio</u>
Great Horned Owl	<u>Bubo virginianus</u>
Common Night Hawk	<u>Chordeiles minor</u>

<u>Common Name</u>	<u>Scientific Name</u>
Red Headed Woodpecker	<u>Melanerpes erythrocephalus</u>
Hairy Woodpecker	<u>Dendrocopos villosus</u>
Eastern Kingbird	<u>Tyrannus tyrannus</u>
Barn Swallow	<u>Hirundo rustica</u>
Blue Jay	<u>Cyanocitta crista</u>
Common Crow	<u>Corvus brachyrhynchus</u>
Black-capped Chickadee	<u>Parus atricapillus</u>
Tufted Titmouse	<u>Parus bicolor</u>
Common Catbird	<u>Dumetella carolinensis</u>
Robin	<u>Turdus migratorius</u>
Cardinal	<u>Richmondia cardinalis</u>
Mockingbird	<u>Mimus polyglottos</u>
Grasshopper Sparrow	<u>Ammodramus savannarium</u>
Field Sparrow	<u>Spizella pusilla</u>

*recent introduction

MAMMALS

Virginia Opposum	<u>Didelphis virginianus</u>
Short-tailed Shrew	<u>Blarina brevicauda</u>
Least Shrew	<u>Cryptotis parva</u>
Eastern Mole	<u>Scalopus aquaticus</u>
Little Brown Myotis	<u>Myotis lucifugus</u>
Big Brown Bat	<u>Eptesicus fuscus</u>
Hoary Bat	<u>Lasiurus cinereus</u>
Black-tailed Jackrabbit	<u>Lepus californicus</u>
Cottontail Rabbit	<u>Sylvilagus floridanus</u>
Fox Squirrel	<u>Sciurus niger</u>
Thirteen-lined Ground Squirrel	<u>Cynomys ludovicianus</u>
Franklin's Ground Squirrel	<u>Citellus franklinii</u>
Pocket Gopher	<u>Geomys busarius</u>
Hispid Pocket Mouse	<u>Perognathus hispidus</u>

<u>Common Name</u>	<u>Scientific Name</u>
Beaver	<u>Castor canadensis</u>
Grasshopper Mouse	<u>Onychomys leucogaster</u>
Pigmy Harvest Mouse	<u>Reithroclontomys montanus</u>
Deer Mouse	<u>Peromyscus maniculatus</u>
Wood Mouse	<u>Peromyscus leucopus</u>
Hispid Cotton Rat	<u>Sigmodon hispidus</u>
Florida Wood Rat	<u>Neotoma floridanus</u>
Lemming Mouse	<u>Synaptomys cooperi</u>
Prairie Vole	<u>Microtus ochrogaster</u>
Coyote	<u>Canis latrans</u>
Red Fox	<u>Vulpes fulva</u>
Striped Skunk	<u>Mephitis mephitis</u>
Spotted Skunk	<u>Spilogal interruptus</u>
White-tailed Deer	<u>Odocoileus virginianus</u>
Raccoon	<u>Procyon lotor</u>
Bobcat	<u>Lynx rufus</u>
Muskrat	<u>Ondatra zibethica</u>
Antelope*	<u>Antilocapra americana</u>
Woodchuck	<u>Marmota monax</u>
Longtail Weasel	<u>Mustela frenata</u>

*recent introduction

APPENDIX D
SEPTIC LEACHATE SURVEY REPORT

SEPTIC LEACHATE SURVEY
MARION COUNTY LAKE, KANSAS
November, 1979

Prepared for
U.S. Environmental Protection Agency
324 East 11th Street
Kansas City, Missouri 64106

Prepared by
K-V Associates, Inc.
Falmouth, Massachusetts

December, 1979

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1.0 INTRODUCTION

Marion County Lake, the study area, is located in the eastern portion of the Flint Hills, northeast of Wichita, Kansas. This lake was formed by damming an unnamed tributary of the Cottonwood River. The dam was constructed in the 1930's by the Civilian Conservation Corps and provides for a lake surface of about 150 acres. The area is underlain by shales and limestone formations. The lake was built for fishing and recreational purposes and is now settled by approximately 230 year-round or seasonal dwellings along Lake Shore Drive, which encompasses the northern two-thirds of the lake. All homes are serviced by individual water wells and septic tanks. This lake area is currently undergoing a sewerage needs evaluation designed to determine the extent of septic waste water impacts on the lake. The following report presents the results of a septic leachate survey of Marion County Lake performed during November, 1979

1.1 Effluent Plume Theory

In porous soils, groundwater inflows frequently convey wastewaters from nearshore septic units through bottom sediments and into lake waters, causing attached algae growth and algal blooms. The lake shoreline is a particularly sensitive area since: 1) the groundwater depth is shallow, encouraging soil water saturation and anaerobic conditions; 2) septic units and leaching fields are frequently located close to the water's edge, allowing only a short distance for bacterial

degradation and soil adsorption of potential contaminants; and 3) the recreational attractiveness of the lakeshore often induces temporary overcrowding of homes leading to hydraulically overloaded septic units. Rather than a passive release from lakeshore bottoms, groundwater plumes from nearby on-site treatment units may actively emerge along shorelines raising sediment nutrient levels and creating local elevated concentrations of nutrients. The contribution of nutrients from subsurface discharges of shoreline septic units has been estimated at 30 to 60 percent of the total nutrient load in certain New Hampshire lakes (LRPC, 1977).

The capillary-like structure of sandy, porous soils and horizontal groundwater movement induces a fairly narrow plume from malfunctioning septic units. The point of discharge along the shoreline is often through a small area of lake bottom, commonly forming an oval-shaped area several meters wide when the septic unit is close to the shoreline. In denser subdivisions containing several overloaded units, the discharges may overlap forming a broader increase (see Figure 1).

1.1.1 Groundwater Plumes

Three different types of groundwater-related wastewater plumes are commonly encountered during a septic leachate survey: 1) erupting plumes, 2) passive plumes, and 3) stream source plumes. As the soil becomes saturated with dissolved solids and organics during the aging process of a leaching on-lot septic system, a breakthrough of organics occurs first, followed by inorganic penetration (principally chlorides, sodium, and other salts). The active emerging of the combined organic

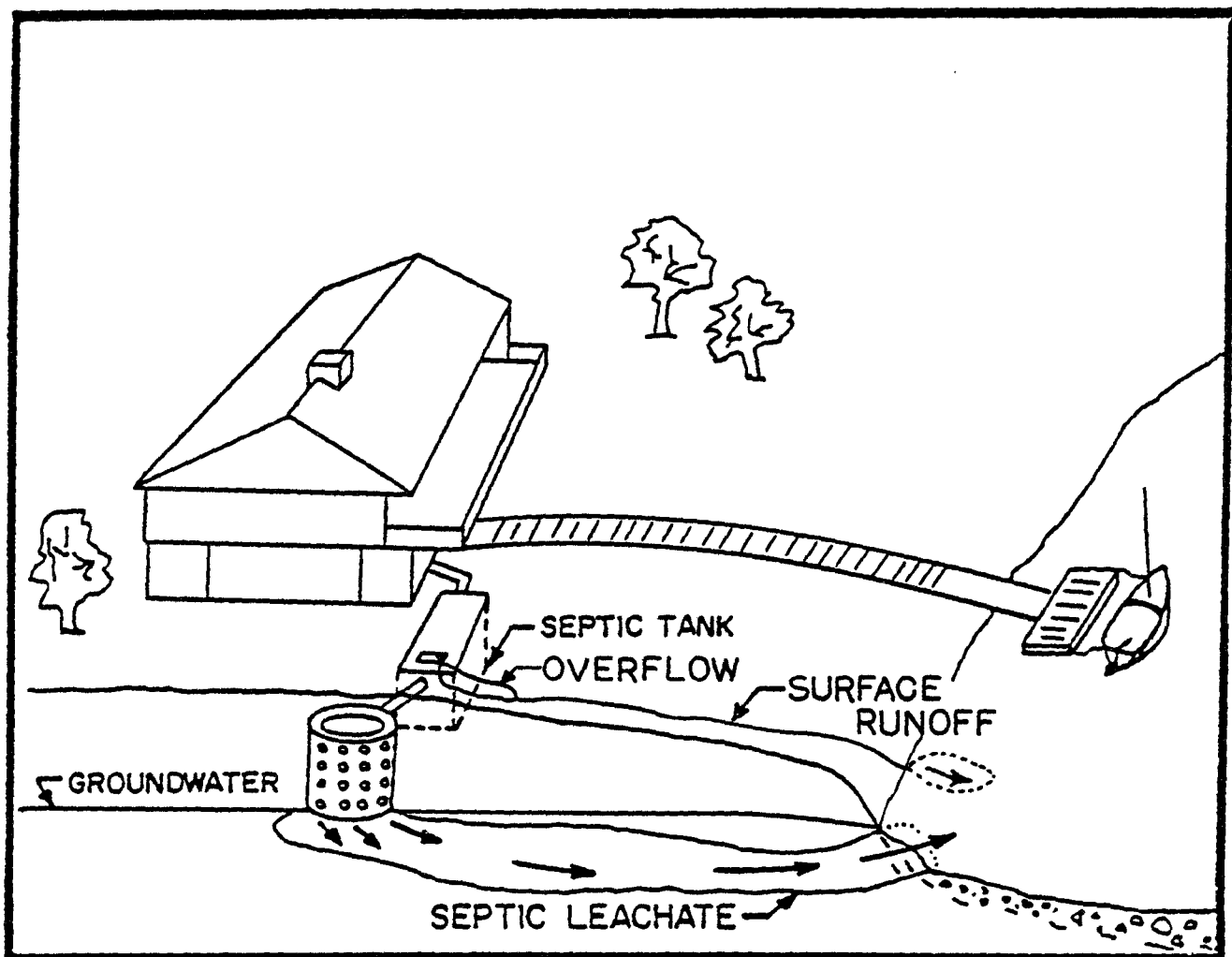


Figure 1. Excessive loading of septic systems causes the development of plumes of poorly-treated effluent which may 1) enter nearby waterways through surface runoff or which may 2) move laterally with groundwater flow and discharge near the shoreline of nearby lakes.

and inorganic residues into the shoreline lake water describes an erupting plume. In seasonal dwellings where wastewater loads vary in time, a plume may be apparent during late summer when shoreline cottages sustain heavy use, but retreat during winter during low flow conditions. Residual organics from the wastewater often still remain attached to soil particles in the vicinity of the previous erupting plume, slowly releasing into the shoreline waters. This dormant plume indicates a previous breakthrough, but sufficient treatment of the plume exists under current conditions so that no inorganic discharge is apparent. Stream source plumes refer to either groundwater leachings or near-stream septic leaching fields which enter into streams which then empty into the lake.

1.1.2 Runoff Plumes

Traditional failures of septic systems occur in tight soil conditions when the rate of inflow into the unit is greater than the soil percolation can accomodate. Often leakage occurs around the septic tank or leaching unit covers, creating standing pools of poorly-treated effluent. If sufficient drainage is present, the effluent may flow laterally across the surface into nearby waterways. In addition, rainfall or snow melt may also create an excess of surface water which can wash the standing effluent into water courses. In either case, the poorly-treated effluent frequently contains elevated fecal coliform bacteria, indicative of the presence of pathogenic bacteria and, if sufficiently high, must be considered a threat to public health.

1.2 Special Survey Technique and Equipment

Wastewater effluent contains a mixture of near-UV fluorescent organics derived from whiteners, surfactants and natural degradation products which are persistent under the combined conditions of low oxygen and limited microbial activity. Figure 2 shows two samples of sand filtered effluent from the Otis Air Force Base, Massachusetts, sewage treatment plant. One was analyzed immediately and the other after having been held in a darkened bottle for six months at 20°C. Note that little change in fluorescence was apparent, although during the aging process some narrowing of the fluorescence region did occur. The aged effluent percolating through sandy loam soil under anaerobic conditions reaches a stable ratio between the organic content and chlorides which are highly mobile anions. It is this stable ratio (cojoint signal) between fluorescence and conductivity that allows ready detection of leachate plumes by their conservative tracers. Such identified plumes are an early warning of potential nutrient breakthrough or public health problems. The septic leachate detector instrument utilizes this principal.

Septic surveys for shoreline wastewater discharges are conducted with a septic leachate detector, ENDECO Type 2100 "Septic Snooper"™, and the K-V Associates, Inc. "Dowser"™ Groundwater Flowmeter. The leachate detector unit can be operated out of any small rowboat. It consists of the subsurface probe (water intake system), the analyzer control unit, and an analog stripchart recorder. Initially the unit is calibrated against incremental additions of wastewater effluent of the type to be detected to the background lake water. The pump end of the

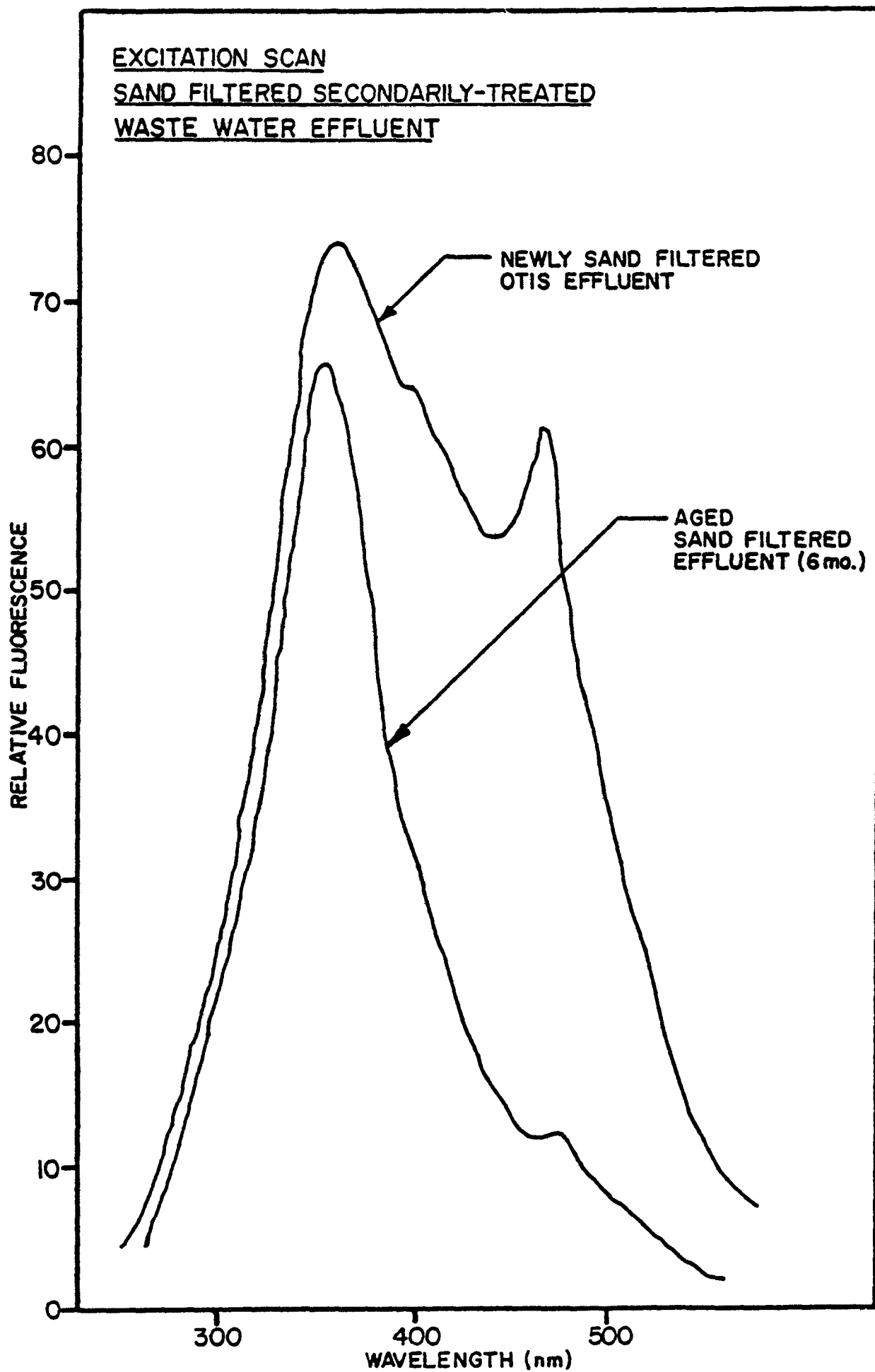


Figure 2. Sand-filtered effluent produces a stable fluorescent signature, here shown before and after aging.

probe unit is then submerged in the lake water along the near shoreline. Groundwater seeping through the shoreline bottom is drawn into the screened intake of the probe and travels upwards to the analyzer unit. As it passes through the analyzer, separate conductivity and fluorescence signals are generated. The responses are sent to a signal processor which registers the separate signals on a strip chart recorder as the boat moves forward. The analyzed water is continuously discharged from the unit back into the receiving water. The battery powered unit used for field studies can record individual fluorescence and conductivity or a combination signal. It has also been modified to operate under the conductance conditions encountered in the field.

Well-point sampling of groundwater and bacterial sampling of surface run-off complement the leachate detector scan, surface water sampling and groundwater flow vector measurements for the complete survey.

2.0 METHODOLOGY - SAMPLING AND ANALYSIS

The objectives of this survey were:

- 1) To perform a shoreline scan of the northeast and western shore for evidence of septic leachate intrusion from on-lot septic systems. The continuous scan along this indented shoreline was completed within three days.
- 2) To take discrete water samples for subsequent nutrient analysis only at those locations of alleged effluent plumes revealed by the leachate detector instrument.
- 3) To take bacteria samples for fecal coliform analysis from all moving surface tributaries or exceptionally high shoreline effluent plumes.
- 4) To make groundwater flow measurements in the shallow holes in the loose sand shoreline of the study areas.
- 5) To make visual observations relevant to sources of lake water degradation.

This survey was executed during the period from 17 through 20 November, 1979. Daytime temperatures ranged from 10° to 20°C. Sun and light air conditions prevailed the day of the continuous shoreline scan of the main body of water. The small isolated bays to the north of the road were surveyed on a day of high winds and rough water on the open lake.

2.1 Procedure

Marion County Lake was surveyed in continuous counter-clockwise direction starting on the eastern shore and concluding at the northwest corner of the eastern dam. The survey team consisted of two technicians and light-weight mobile survey gear. The basic equipment platform was a 12-foot aluminum boat with small outboard. The septic leachate detector instrument was securely lashed to a boat seat with shock cords and the water intake and exhaust tubes were extended over the starboard gunnel. A 12 vdc gel-cell battery provided electrical power to the instrument and submersible pump. The centrifugal water pump at the end of the 5-foot long metal tube intake wand drew near-bottom water through the instrument detector chamber and out a flexible plastic discharge tube from which retained samples could be taken.

A large ice chest held chilled water samples as well as supplies and maintenance gear. Groundwater specimens were drawn through a rugged stainless steel well-point sampler developed by K-V Associates, Inc. This 3/8 inch bore tube had 2½ foot threaded segments to accomodate different water and ground penetration depths. It was fitted with a slotted and pointed tip section. A 10-pound tubular steel hammer was used to drive the point into the bottom at depths of up to 2 feet. Water flowed easily at this depth but was impeded somewhat below this depth by finer, clayey sediments. Interstitial water was extracted via simple hand vacuum pump and large plastic receiving chamber. The captured groundwater could then be readily decanted apart from entrained sediment and bottled for later analysis. Such bottom samples accompanied each surface background sample and each significant plume discovery (none confirmed, in this case).

In summary, the two-man team walked or motored the boat around the lake within 15 feet of shore in shallow water. Background or plume samples were taken as required. Specific conductance of each sample was measured as the water was prefiltered and bottled. Relative fluorescence and conductivity were continuously plotted on separate analog strip recorders with positional cross references to the sewer planning map of the lake. Well water samples were taken from four lakeside homes along the western shore as a check for septic intrusion to drinking water sources.

2.2 Sample Handling

Both ground and surface water samples for nutrient analysis were retained in 250 ml clean plastic bottles. Each sample was prefiltered on the boat, .45 μ m final-filtered and acidified for preservation at the end of the sampling day. The samples were held at 2° C or colder pending laboratory analysis at a later date.

Bacterial samples were captured in similar sterilized 250 ml plastic bottles and mailed to Kansas State Department of Health, Water Microbiology Section, Topeka, Kansas, for fecal coliform analysis.

2.3 Calibration

The shoreline scanning work day began with a calibration of the septic leachate instrument. Two standards were required: the first, a background sample drawn from an assumed unpolluted central portion of the lake; the second, a sample of local Marion municipal lagoon effluent. For the dynamic flow-through calibrations, the instrument was zero stabilized on 3 liters of recirculating background water,

to which 2% (60 ml) of effluent was added. Signal deflections were equalized between the two channels and adjusted to about 50% of full scale. Marion treated effluent was also retained for later nutrient analysis.

2.4 Water Analysis

All water samples were analyzed by EPA standard methods for the following chemical constituents:

Nitrate nitrogen (combined NO_3 - NO_2 -N)

Ammonia nitrogen (NH_4 -N)

Total phosphorous (TP)

3.0 PLUME LOCATIONS

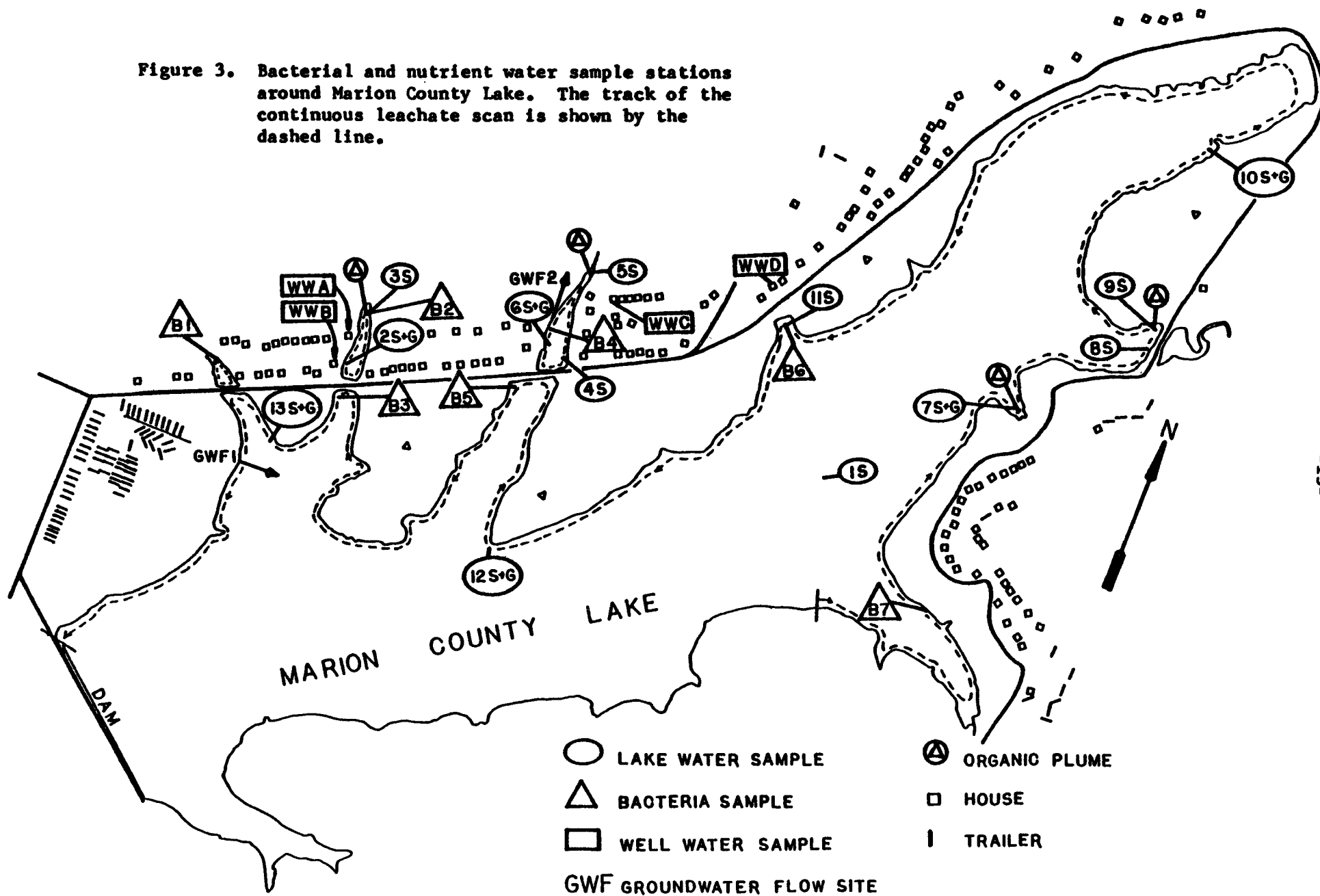
A careful review of septic leachate detector charts and scanning fluorometer traces of retained water samples did not produce any definitive evidence of septic effluent leaching into the waters of Marion County Lake. The survey track and sampling locations are shown in Figures 3 and 6.

Municipal lagoon effluent from the City of Marion was used as a standard, representative of the baseline domestic wastewater of the area and its associated detergent whiteners and brighteners commonly used by the local residents. We examined for characteristic patterns of fluorescence and conductance in surface and groundwater samples drawn from Marion County Lake. The findings showed that although some isolated events were recorded during the continuous leachate shoreline scan, laboratory scanning fluorescence analysis of the associated water samples exhibited a consistent pattern, but one not identifiable with the pattern from lagoon effluent (Figure 4).

Elevated organic signals were observed at the ends of some coves (Bays 1, 2, 3, and 9S). The peaks contained fluorescing materials similar to degrading organic material, but did not contain the predominant UV fluorescent material characteristic of the local effluent (see Figure 4). It is possible that fecal material from cattle may be a source which reaches the coves and ponds during runoff.

The inflow of the tributary to the reservoir was found to carry a noticeable dissolved solid load, seen in segment 9. The phosphorus

Figure 3. Bacterial and nutrient water sample stations around Marion County Lake. The track of the continuous leachate scan is shown by the dashed line.



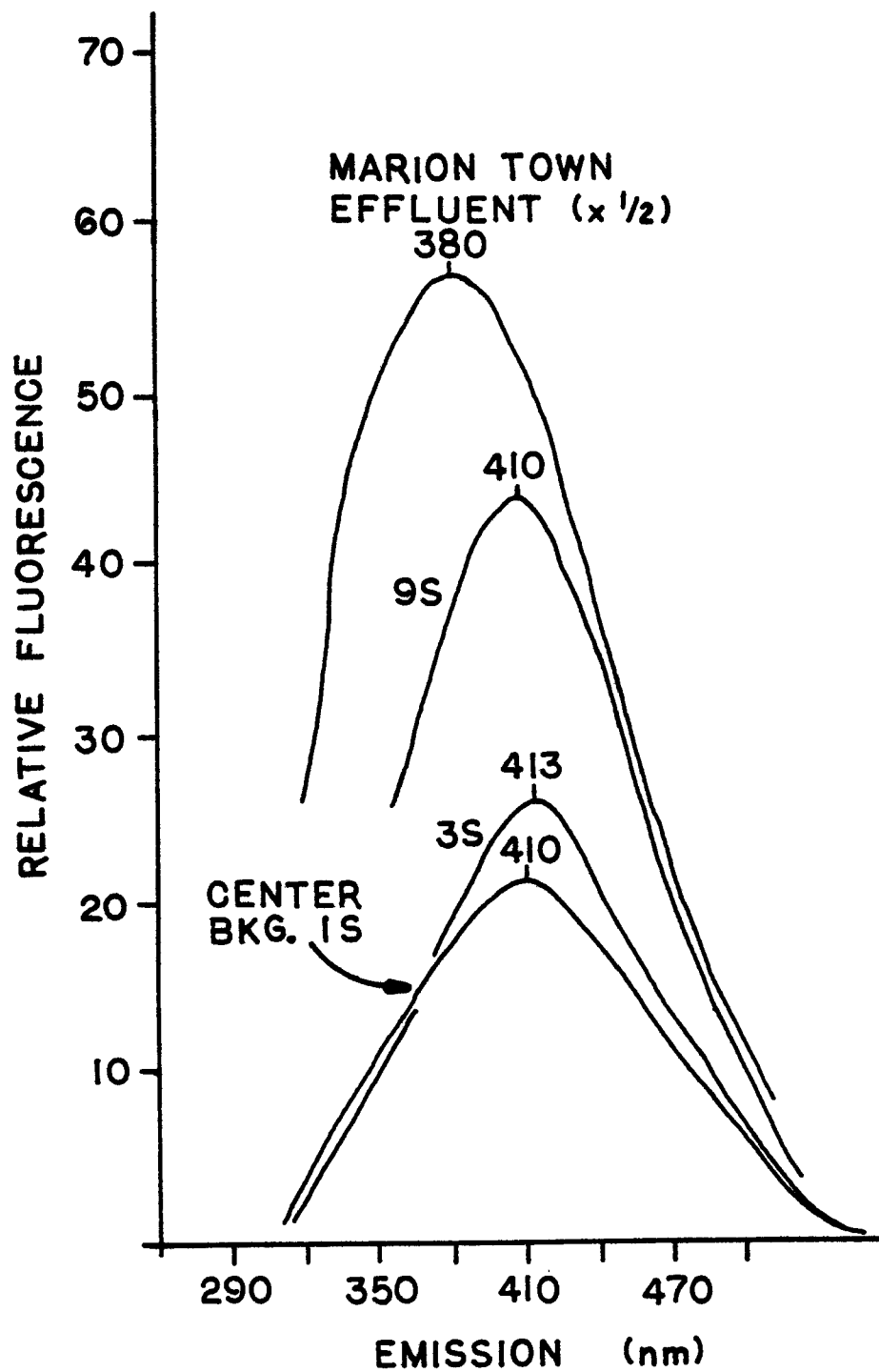


Figure 4. Surface water samples from lakeshore locations showing a distinctly different peak fluorescence emission (~ 410) than Marion town wastewater.

content of the inflow was 50% higher than the background surface water of the lake (sample 10S = .024 TP; sample 1S = .016 TP). Examination of the well water samples for UV fluorescence showed no traces of wastewater effluent.

4.0 NUTRIENT ANALYSIS

Completed analysis of the chemical content of 24 samples taken from around Marion County Lake are presented in Table 1. The numerical sampling code refers to the shoreline sampling locations as seen on the area map (see Figure 3). The symbol "S" refers to a surface water sample, the symbol "G" refers to a groundwater sample, and the symbol "WW" refers to a drinking water well sample. Virtually all groundwater samples were obtained with some difficulty from the clay bottoms of the coves.

The conductivity of the water samples as specific conductance ($\mu\text{mhos/cm}$) is given in the second column. The nutrient analysis for total phosphorus (TP), combined nitrate-nitrite nitrogen ($\text{NO}_3\text{-NO}_2\text{-N}$) and ammonia nitrogen ($\text{NH}_4\text{-N}$) are presented in the next three columns in parts-per-million (ppm-mg/l).

Table 1. Analysis of surface water (S) and groundwater (G) samples taken around the periphery of Marion County Lake, Kansas.

Sample Number		Cond.	Total P ppm	NH ₄ -N ppm	NO ₃ -N * ppm	Comments
WWA	G		.004	.004	.042	well water
WWB	G		.004	.084	.009	"
WWC	G		.004	.016	.106	"
WWD	G		.005	.004	1.722	"
1	S	320	.016	.067	.022	
2	S	320	.024	.478	.026	
	G	400	.017	.079	.009	
3	S	320	.013	.067	.023	
4	S	310	.018	.144	.011	
5	S	320	.012	.003	.005	
6	S	320	.012	.043	.005	
	G	340	.016	.356	.017	
7	S	320	.012	.039	.009	
	G	1270	.010	2.201	.010	
8	S	315	.018	.077	.009	
9	S	340	.021	.060	.007	
10	S	320	.024	.039	.010	
	G	640	.007	.106	.308	
11	S	315	.014	.022	.008	
12	S	300	.012	.033	.007	
	G	430	.017	.183	.017	
13	S	300	.013	.033	.008	
	G	430	.026	.356	.033	
Marion effluent		1780	4.290	8.923	.153	

* combined NO₃-NO₂-N

5.0 GROUNDWATER FLOW PATTERNS

Recent investigations of the aquifer configuration and field determinations along the shoreline reveal little influence of groundwater inflow on Marion County Lake. Bowers (1979) reported field well pump test results which suggest that the principal aquifer resides in the fractured and jointed Towanda limestone at some depth below the lake bottom (Figure 5). The thinly fractured Gage shale overlying the Towanda limestone increases slightly in permeability with depth but is still much less permeable than the Towanda limestone. Current water levels in wells surrounding the lake indicate that the piezometric surface of the groundwater has adjusted to the lake level on the east shore but slopes downwards and away from the lake on the west shore. Inflow from the shoreline would be expected only from the eastern shore, based upon Bowers' observations. In agreement, the only erupting discharges found during the leachate survey were observed at Station 9 on the east side and with the creek inflow. These inflows appear to be shallow surface flows, restricted to stream drainage and not flows through the Gage shale. Even in the cove where samples 7S and G were taken, no inflow of interstitial water from lake bottom sediments was observed in the overlying surface water.

The upper portion of the Gage shale which forms the lake bottom acts as an aquitard with its low permeability. Bowers attributes the rise in piezometric surface to percolation or leakage from the lake (most probably from the deep lake bottom which intercepts more permeable lower shale layers) into the Towanda limestone aquifer.

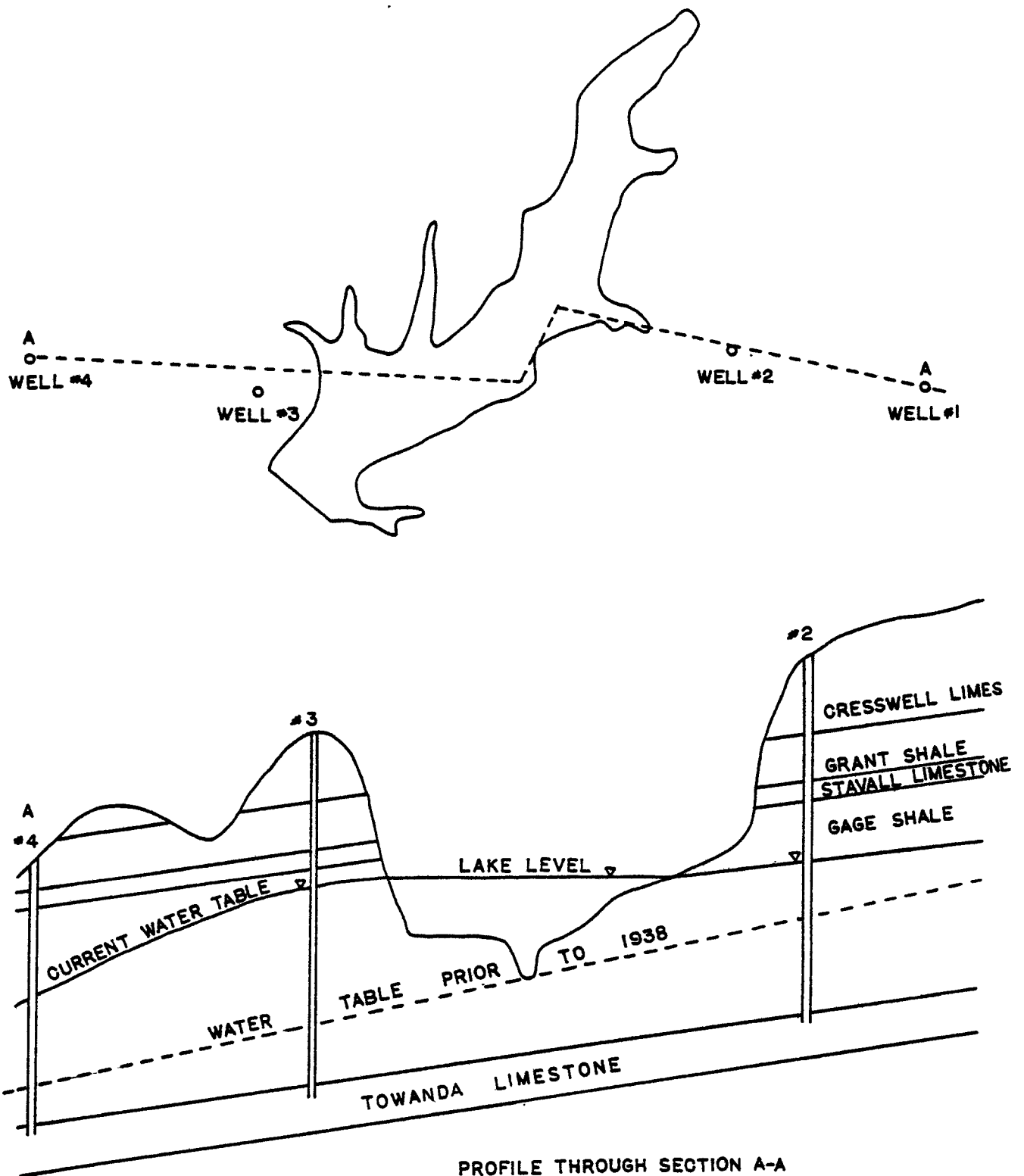


Figure 5. Projected groundwater (piezometric) heights developed by Bowers (1979) to show effects of lake creation. The crosssection corresponds to transect A-A shown above.

Our limited field findings would support the concept of a low permeability upper lakeshore bottom of shale and silty clay soils. The dominant soils include Chase silty clay, Dwight silt, Irwin silty clay, Labette-Sogn complex, Sogn silty clay, Tully silty clay and Verdigris silt. We were unable to measure shallow groundwater movement in any more than two locations around the shore due to the difficult rock, gravel and clay conditions, although many more such sites were attempted.

6.0 COLIFORM LEVELS IN SURFACE WATERS

A series of water samples from around the lake was analyzed for fecal coliform content to confirm the presence of surface runoff or soil short-circuiting from malfunctioning systems. The membrane filter coliform count indicates the density of coliform organisms. Since these organisms may be of intestinal origin and are numerous in sewage, high numbers are indicative of sewage pollution with its possible hazards to public health. Here, the fecal coliform count was used as a more specific test of recent sewage pollution.

There was no record of high levels of coliform from historical sampling (Charles Penner, Marion County Sanitarian, December, 1979). All current samples contained low bacterial concentrations. Kansas water quality standards specify that fecal coliform numbers not exceed the geometric mean of 200 organisms per 100 ml of water for class A waters for recreational use and aquatic life. Therefore, all samples were well within State standards.

Coliform analysis was performed by the Kansas State Department of Health, Topeka, Kansas. See Table 2 for results and Figure 3 for sample locations.

Table 2. Bacterial content for shoreline samples, Marion County Lake.

Station Number	Fecal Coliform No./100 ml	Location
B1	45	Back of first bay, west shore
B2	45	Back of second bay, west shore
B3	45	West side of Bay 2, south of road
B4	45	West end of Bay 3, west shore
B5	45	West side of Bay 3, south of road
B6	50	End of small cove, western shore
B7	5	Back of bay, eastern shore

7.0 CONCLUSIONS

A septic leachate survey was performed along the shoreline of Marion County Lake during November, 1979. The following results were obtained:

- 1) Septic leachate profiles along the shoreline recorded elevated organic signals only at the ends of isolated coves.
- 2) Analysis of the organic traces by UV-fluorescent scans indicated that the peaks contained fluorescing materials similar to degrading organic material, but did not contain the whitening agents characteristic of the local effluent. It is possible that fecal material from cattle may have been a probable source which reaches the coves from runoff from wading ponds or ditches upstream of the deposits.
- 3) Drinking well elevation records and the inability to obtain any meaningful measurements of groundwater inflow from shoreline deposits indicate that there is little groundwater inflow along the shoreline periphery.
- 4) The nutrient loadings from identified sources was quite low. Of the identified plumes of organic material, only two locations (2S and 9S) contained noticeably higher phosphorus contents than that of the background lake content (samples 1S, 10S, 12S). Sample 9S was obtained from an erupting organic plume of stream drainage removed from developed shoreline areas.
- 5) Bacterial analysis of cove surface water samples revealed fecal coliform concentrations well below class A standards for recreational use and aquatic life.

REFERENCES

Bowers, Norman, 1979. Kansas State University groundwater hydrology course term paper. Received via Region 7, U.S. Environmental Protection Agency, Kansas City, Missouri (RWS-30).

LRPC, 1977. Discussion of nutrient retention coefficients, Draft Report 6F2 from Phase II Nonpoint Source Pollution Control Program, Lakes Region Planning Commission, Meredith, New Hampshire.

APPENDIX

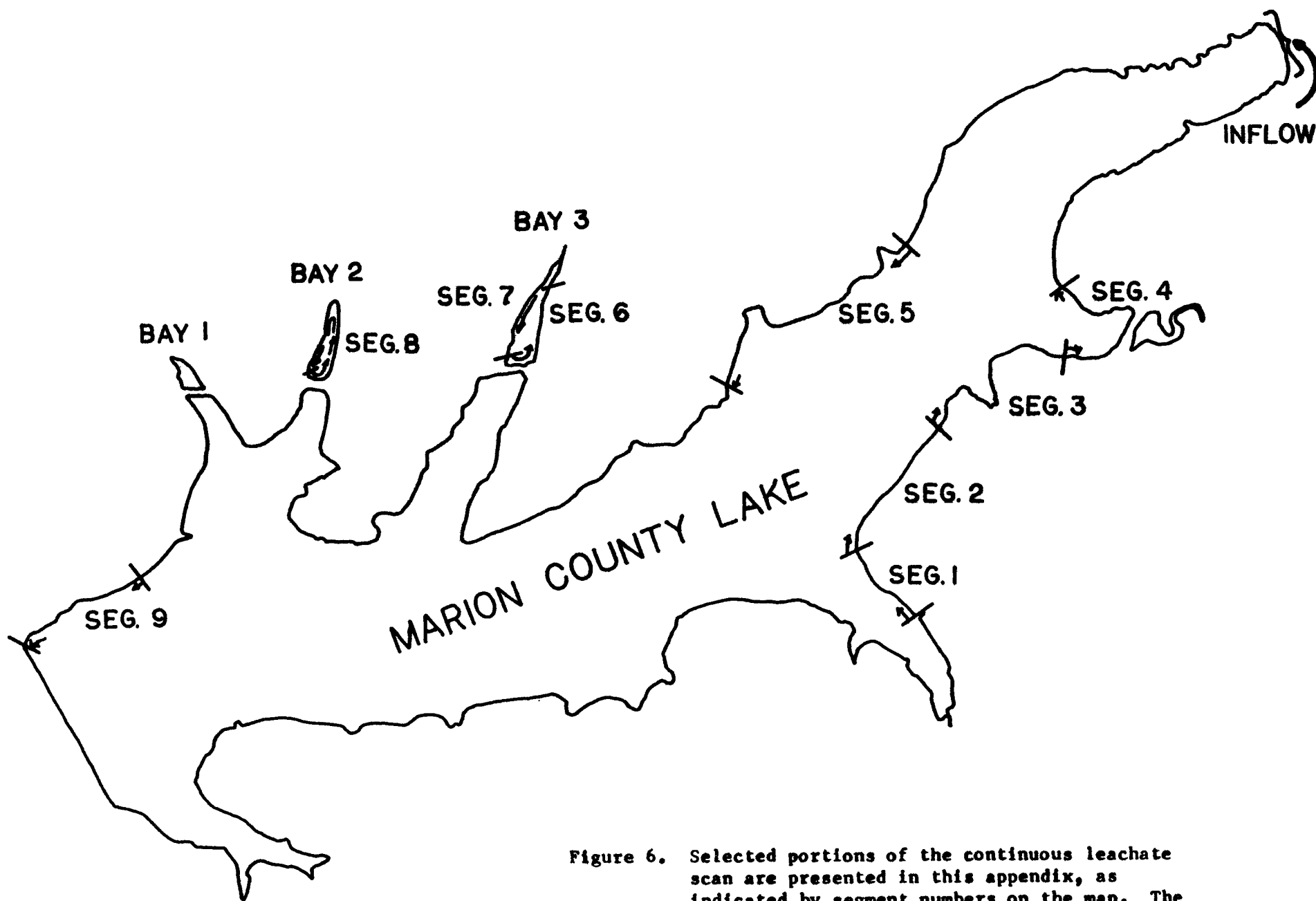
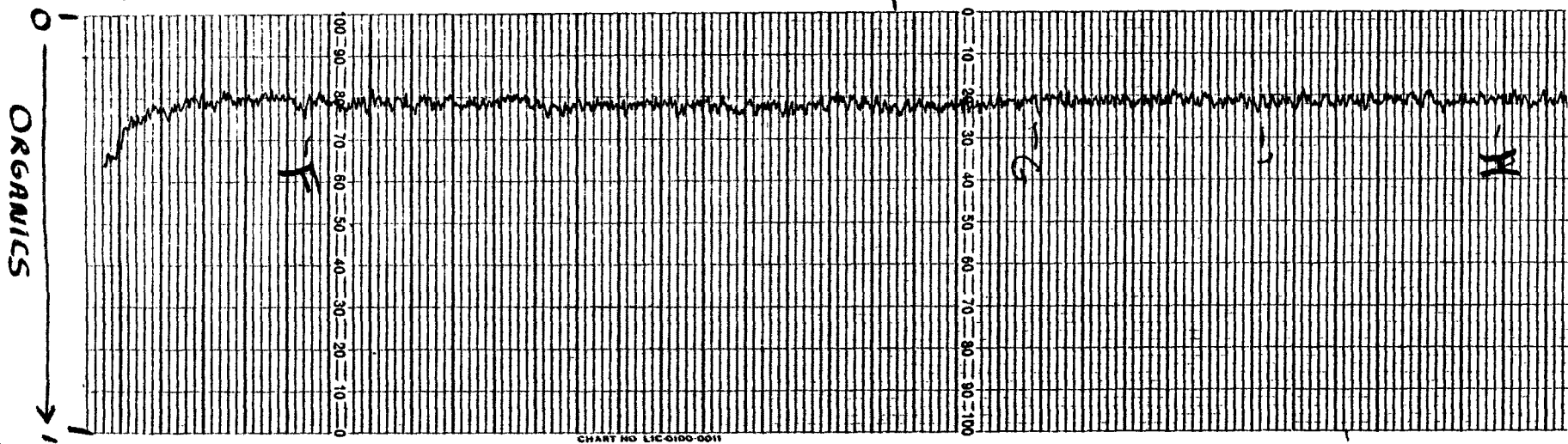
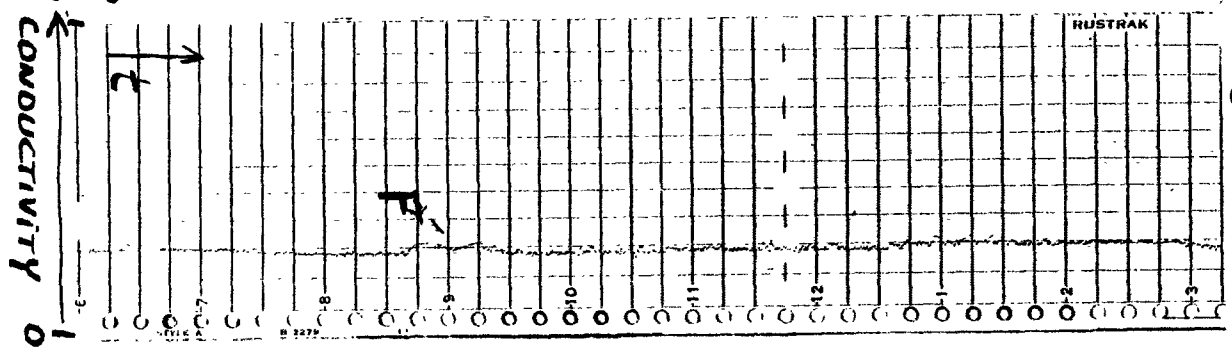


Figure 6. Selected portions of the continuous leachate scan are presented in this appendix, as indicated by segment numbers on the map. The scan consists of paired organic (fluorescence) and conductivity strip charts. The time scales are slightly different, but are cross-referenced.

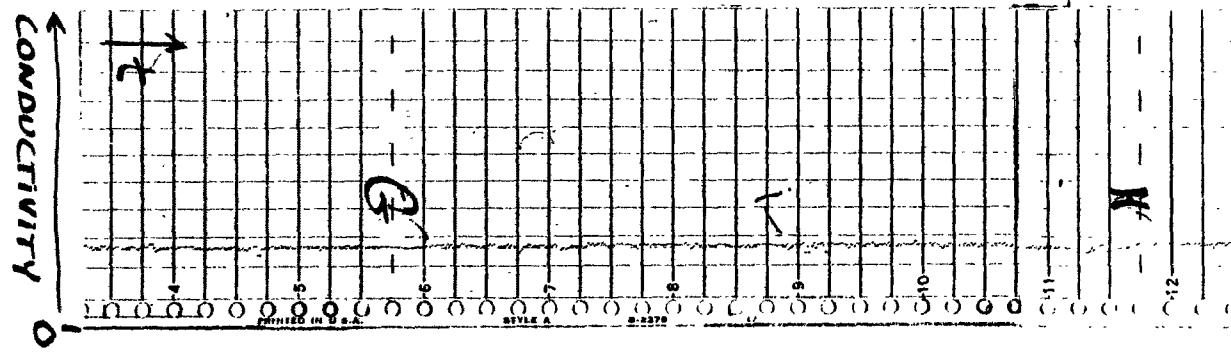
seg. 1 ← | → seg. 2

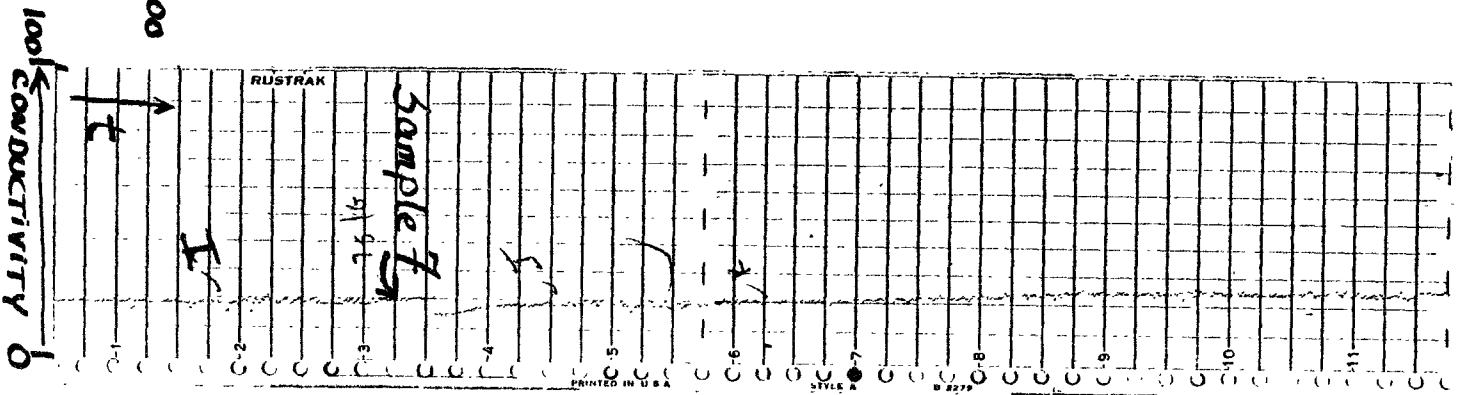
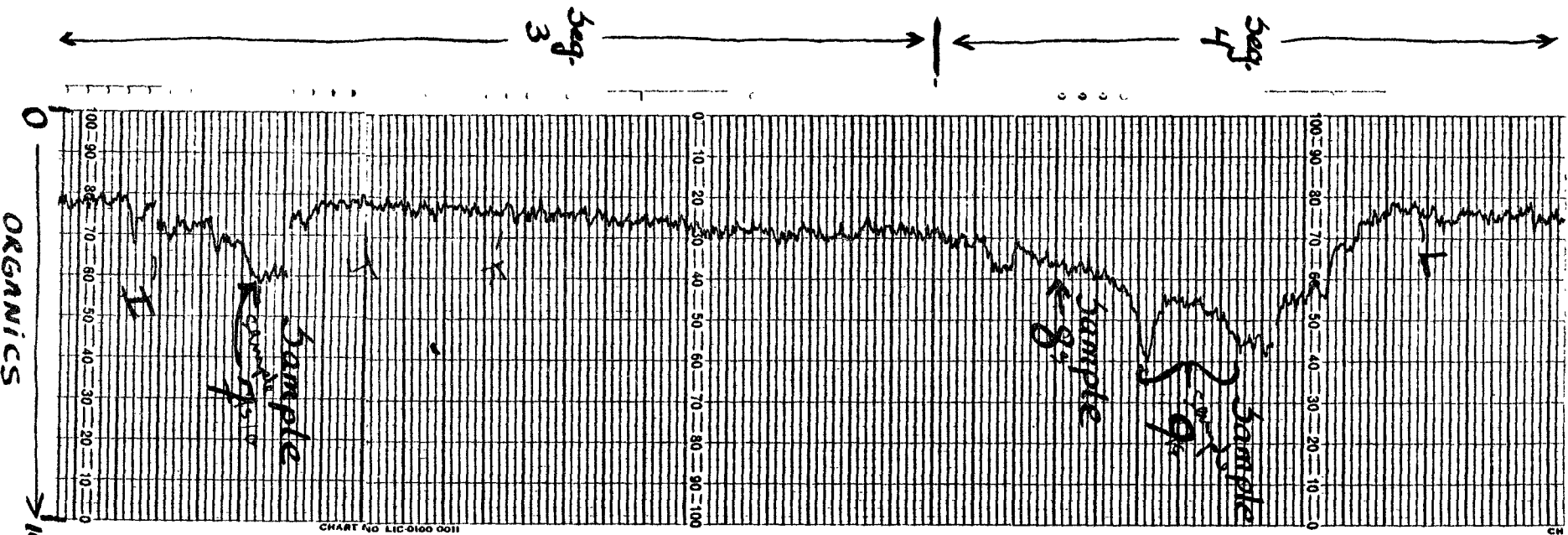


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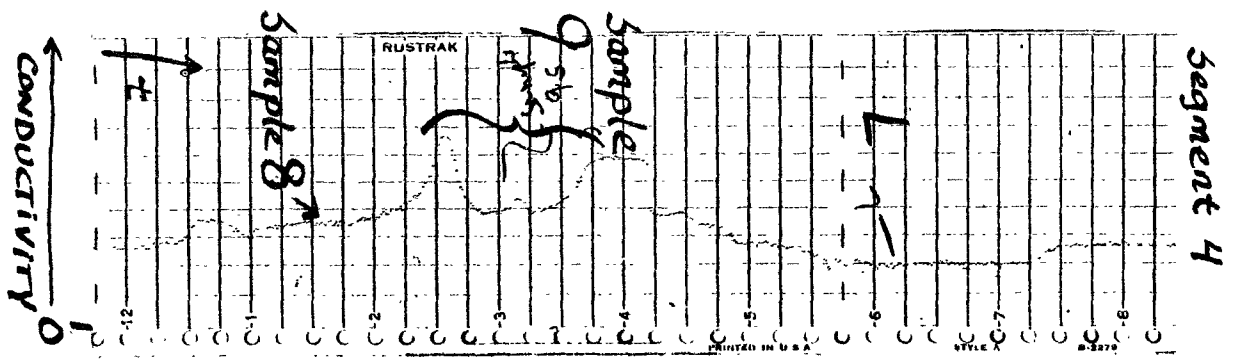


Segment 2



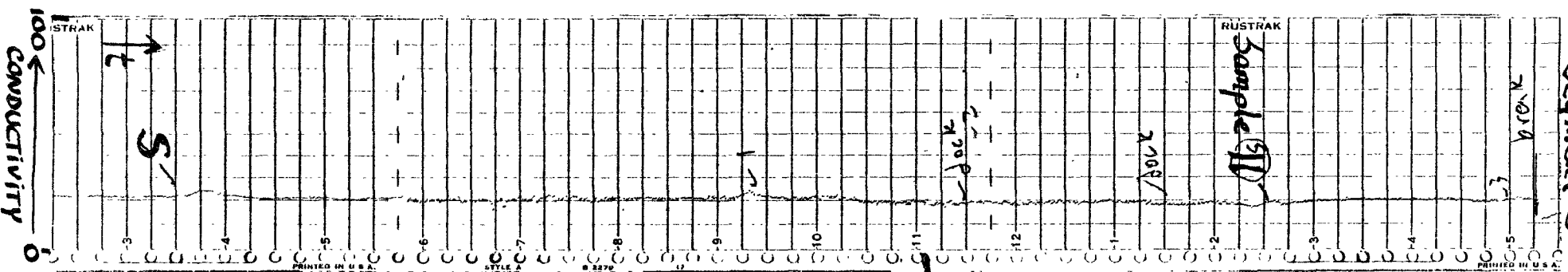


Segment 3



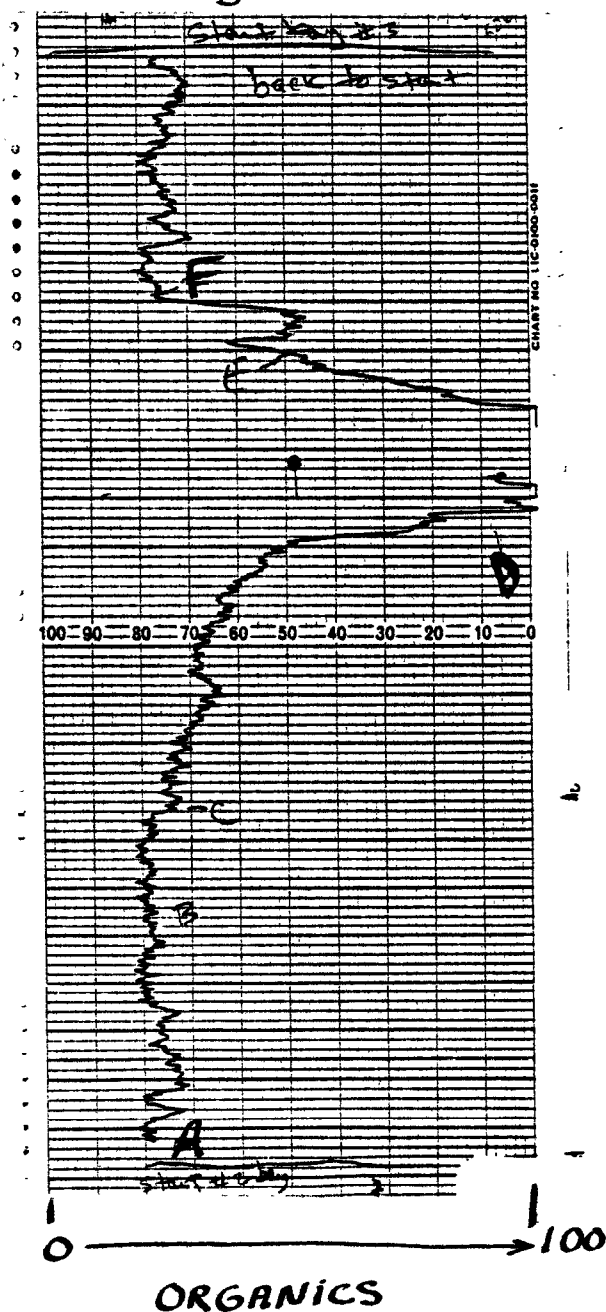
Segment 4

Segment 5

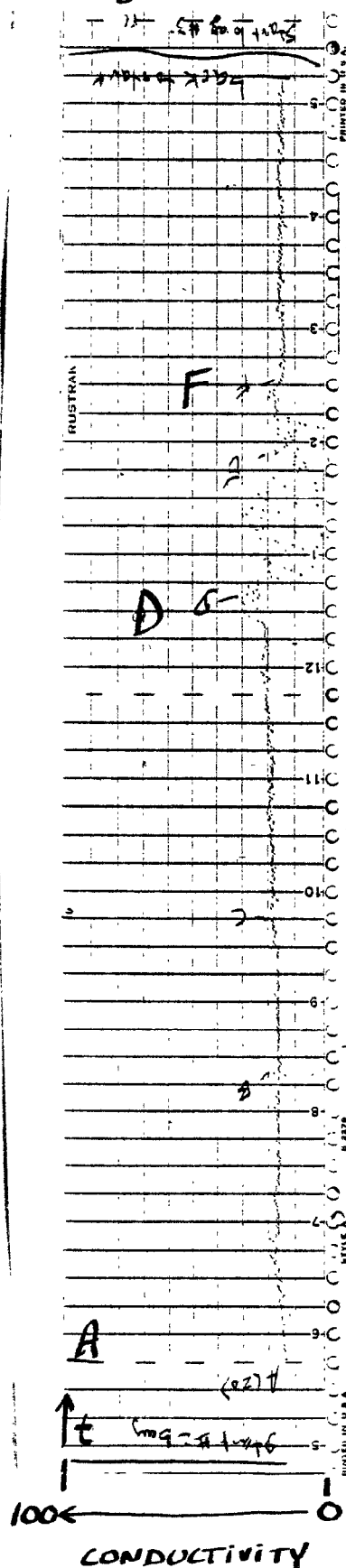


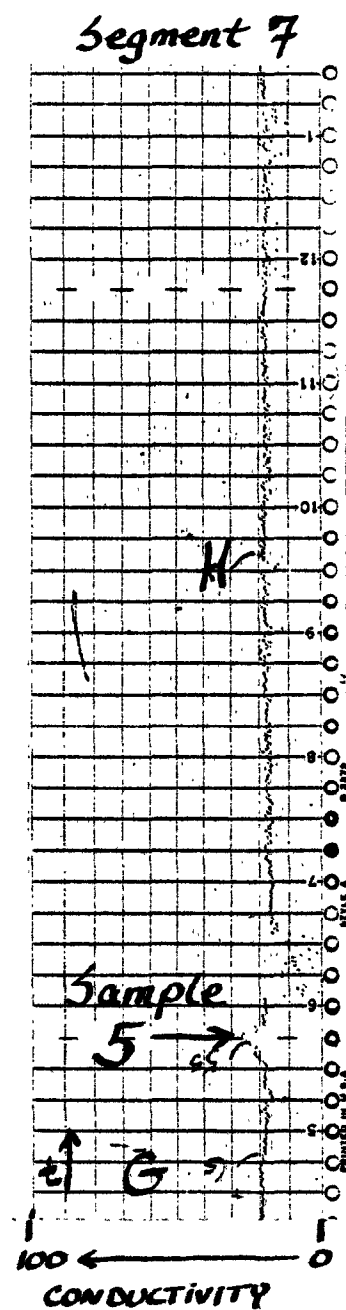
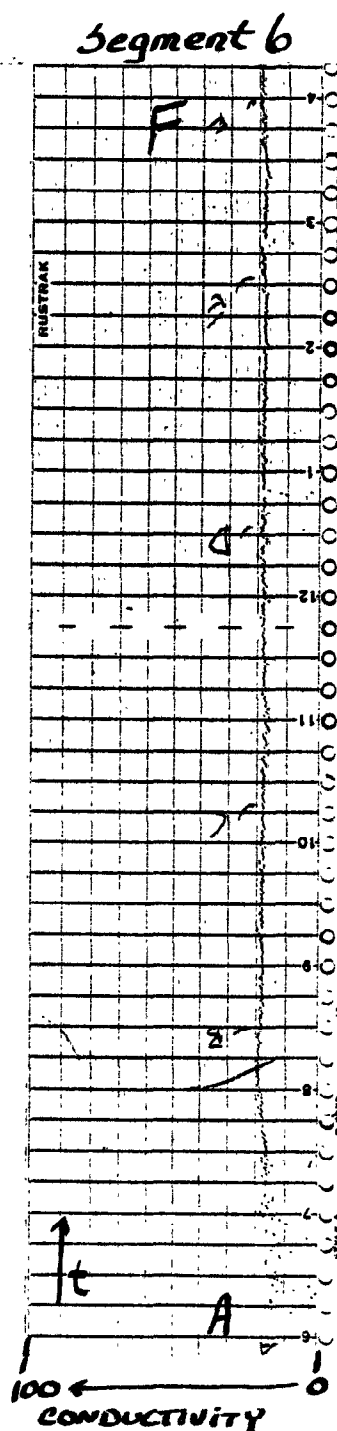
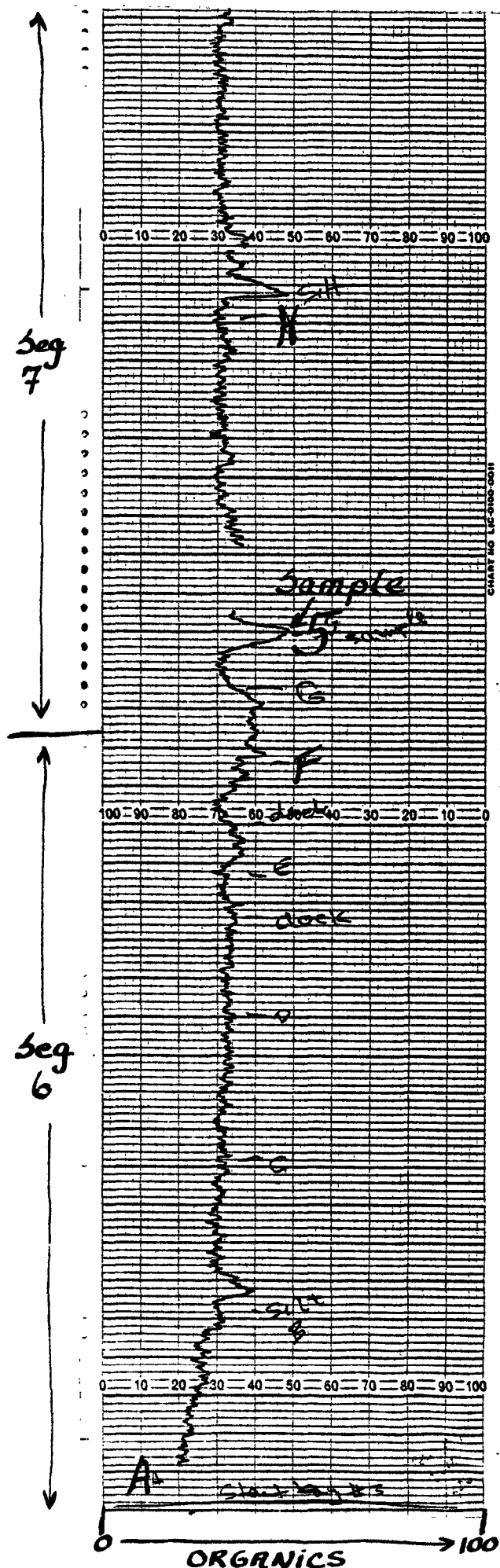
BAY #2

Segment 8



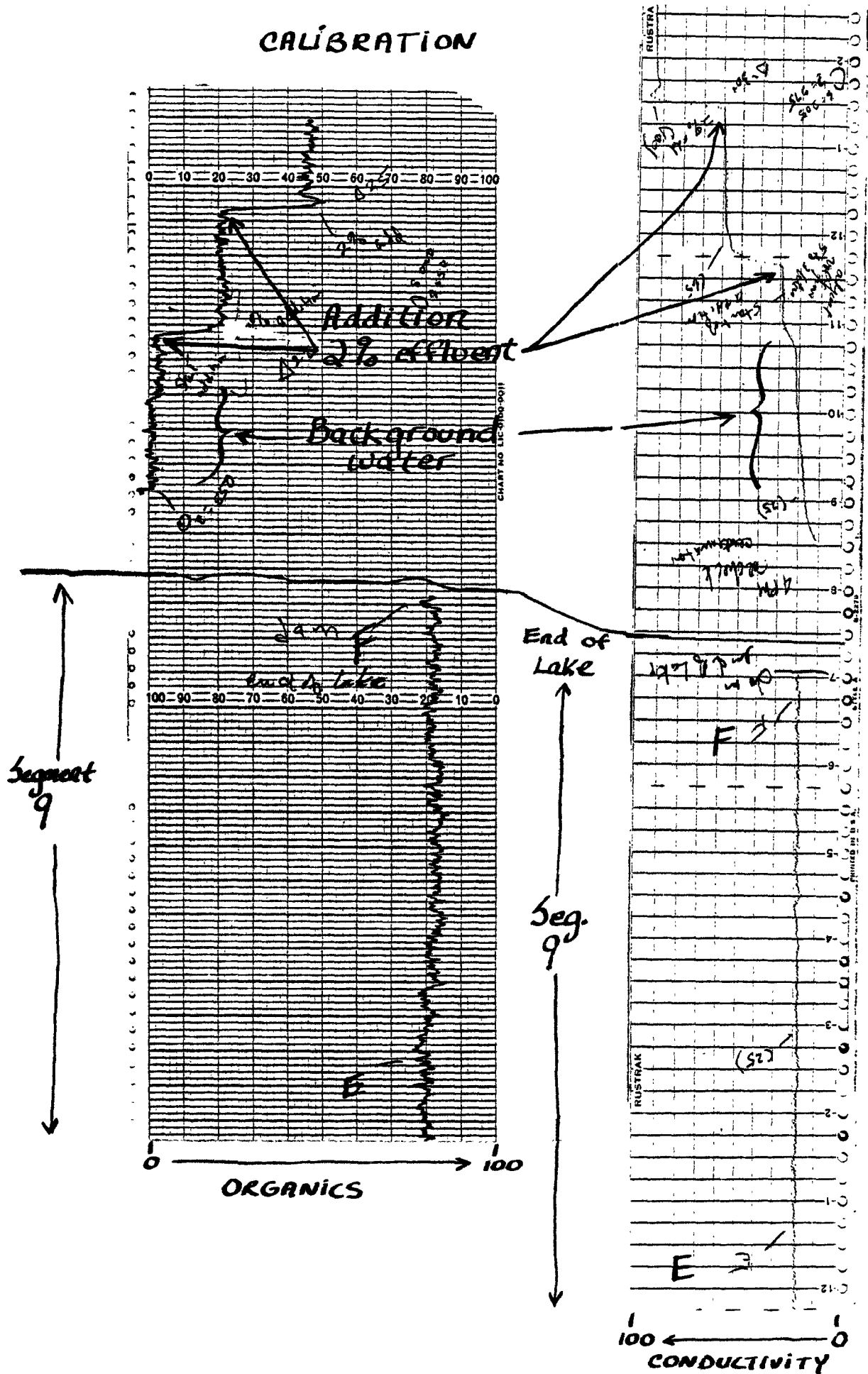
Segment 8



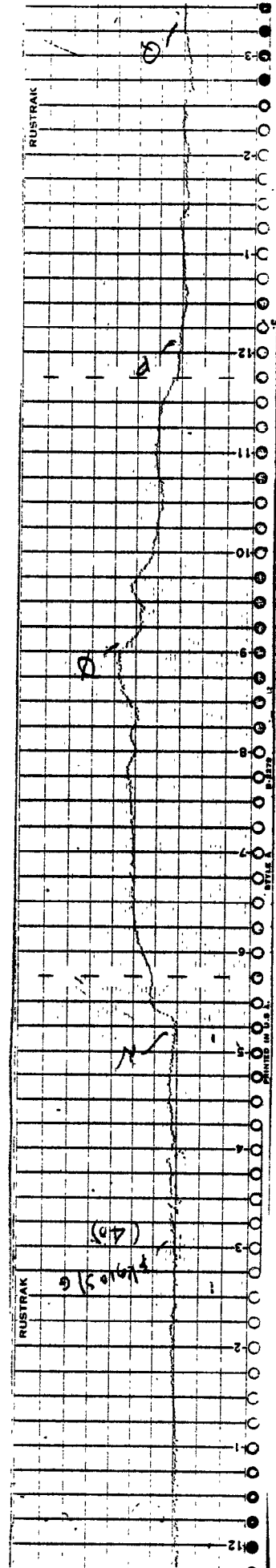
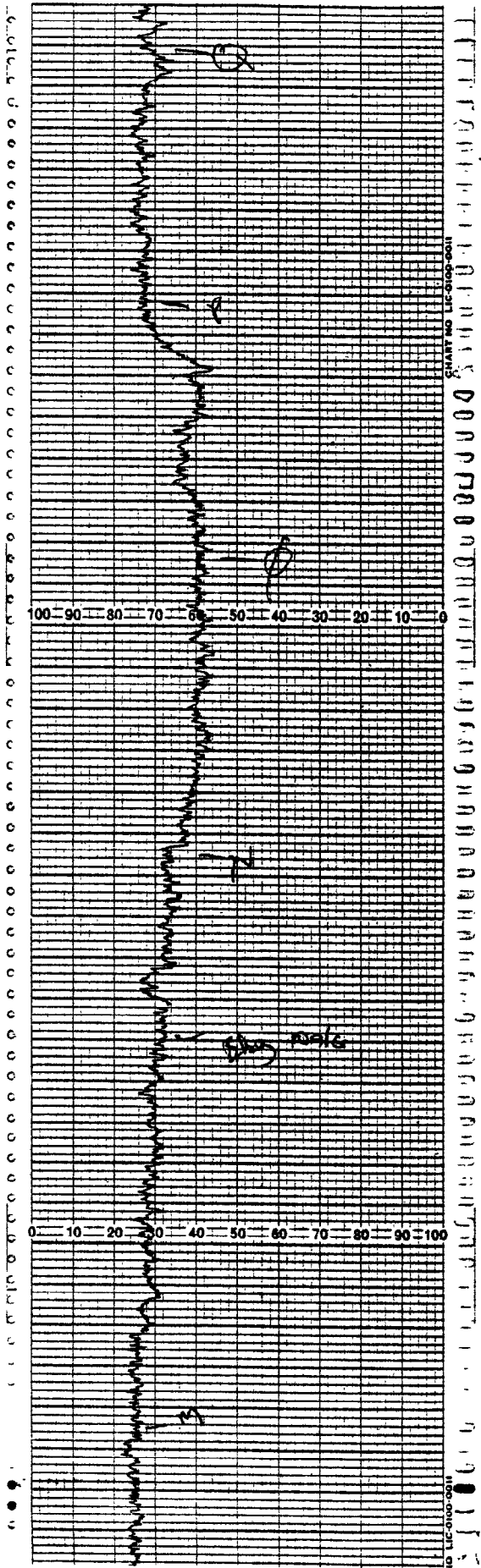


BAY
#3

CALIBRATION



Inflow



APPENDIX E

COST EFFECTIVENESS

This appendix presents the parameters used in developing capital and operating cost estimates for the project alternatives presented in this EIS. Further, the tables at the end of this appendix present these parameters in the context of the present value calculations which are the basis of the cost-effective analysis.

1. General Assumptions

All design flows are based upon the population projections and flow rates shown in Table 6 in Chapter II. Population growth from the present day to the year 2000 was assumed to occur at a constant rate.

Unless otherwise noted in this appendix, all unit costs are identical to those used in the Facility Plan.

2. Centralized Treatment Alternatives

For both the Down-Sized Facility Plan Alternative and the Down-Sized Total Retention Lagoon Alternative, the following assumptions were made:

- ° Because capital and O&M costs for the final pumping station would vary depending upon the distance to be pumped to the treatment plant, costs for this station were included with those of the treatment system rather than the collection system.
- ° Because of the reduced design flows, capital costs for the remaining eight pump stations were estimated to be \$18,000 each rather than \$20,000.
- ° A 4"-diameter PVC force main (rather than 6") was proposed for transporting sewage from the final pump station to the treatment plant.

3. Downsized Facility Plan Alternative

- ° Capital cost for the final pump station was estimated to be \$25,000; O&M costs were estimated to be \$1,400 per year.
- ° Average daily flow was projected to be 28,000 gpd and peak day flow 69,500 gpd.
- ° Average daily BOD load was projected to be 90 lb/day and peak day BOD 360 lb/day.
- ° The Lake Improvement District's estimated share of the capital costs of the new City of Marion oxidation ditch treatment plant was based upon the additional flow and BOD load to be contributed by the District. Capital costs of the major plant components were allocated to the LID based upon the following percentages:
 - Ditch - 60% flow, 40% BOD
 - Rotors - 30% flow, 70% BOD
 - Piping - 100% flow
 - Sludge Disposal - 10% flow, 90% BOD
 - Headworks - 100% flow
 - Flow Measurement - 100% flow
- ° The LID's share of operation and maintenance costs of the City's plant were allocated according to the following percentages:
 - Labor - 53% flow, 47% BOD
 - Repair & Maintenance - 53% flow, 47% BOD
 - Power - 10% flow, 90% BOD

4. Downsized Total Retention Lagoon

- ° Because local soils would require expensive preconstruction treatment to meet Kansas regulations, it was assumed that a membrane liner would be required to prevent seepage from the lagoon.
- ° Dike earthwork and perimeter fencing were assumed to be proportional to the square root of the required lagoon surface area.

- Based upon discussions with local realtors, land costs were assumed to be \$750 per acre.
- Operation and maintenance costs were assumed to be \$9,600 for labor and \$600 for parts and materials per year.
- Capital cost for the final pump station was estimated to be \$20,000; O&M costs were estimated to be \$800 per year.

5. No-Action Alternative

Future costs for this alternative were based on the premise that septic tank system failures and holding tank installations would continue at the same rates that have occurred since 1973, when the Marion County Sanitary Code was put into effect. These rates are:

- Septic tank failures will occur at the rate of one per year.
- Failed septic tanks will be repaired at the rate of 0.28 per year.
- Failed septic tanks will be replaced with holding tanks at the rate of 0.28 per year.
- Other septic tanks will be replaced by holding tanks at the rate of 0.71 per year.
- Holding tanks will be installed on new lots at the rate of 1.28 per year.
- All units presently using privies will be converted to holding tanks at the rate of 0.45 per year.
- Holding tanks will have 1250 gallon capacity, but will be emptied when reaching the 1100 gallon level.
- Each permanent household septic tank will be pumped out once every four years.
- Each seasonal household septic tank will be pumped out once every five years.
- Holding tank pumpout costs will increase from the present \$40 to \$47, based upon a projected increase from \$3 to \$10 in the dump charge at the new City of Marion plant.
- Based upon discussions with local contractors, capital costs for new holding tanks were assumed to be \$700.

6. Limited On-Site Systems Alternative

The same assumptions used for the No-Action Alternative apply to this alternative, with the following exceptions:

- All presently-failing septic tanks will be replaced with holding tanks
- Because of increased inspection efforts, all septic tank systems failing in the future will be detected and replaced with holding tanks
- 1500 gallon tank truck operating times were assumed to be 60 minutes for pump-out, 30 minutes for dumping, and 10 minutes for travel time to and from the treatment plant
- 4500 gallon tank truck operating times were assumed to be 60 minutes per pump-out, 15 minutes between pumpouts, 45 minutes for dumping, and 10 minutes travel time to and from the treatment plant
- The 1500 gallon tank truck can pump out one holding tank or septic tank per trip
- The 4500 gallon tank truck can pump out four holding tanks or septic tanks per trip
- Truck O&M was assumed to be \$0.30 per mile
- Labor was assumed to cost \$15.00 per hour
- Based upon estimates provided by Moser and Associates, dumping charges at the new plant will be \$10 per thousand gallons

7. Detailed Present Value Calculations

The tables which follow show the development of the present value of each project alternative. They list the design elements and cost factors from which capital and operating cost estimates were derived, and detail the steps taken to convert these estimates to present value.

TABLE E-1
PRESENT VALUE
ALTERNATIVE 1 - NO ACTION

<u>PROJECT ELEMENT</u>	<u>COST FACTORS</u>	<u>PRESENT VALUES¹</u>
TREATMENT		
A. <u>Capital Costs</u>	0	0
B. <u>Salvage Values</u>	0	(0)
C. <u>Annual Operation & Maintenance Costs</u>		
Replace failing systems with holding tanks	2.75 tanks/yr @ \$700/tank	1,900
Replace failing systems with septic tanks	0.45 tanks/yr @ \$1,100/tank	500
Pumpouts	1870/yr @ \$47/pumpout	87,900
Septic tank leach field repair	0.28 failure/yr @ \$200/repair	100
Sub-total		90,400
Total present value sum	20 yrs at 7.125% discount	948,500
 TOTAL PRESENT VALUE		 948,500
 EQUIVALENT ANNUAL VALUE		 90,400

¹ Rounded to the nearest \$100

TABLE E-2
PRESENT VALUE
ALTERNATIVE 2 - FACILITY PLAN PROPOSED PROJECT

<u>PROJECT ELEMENT</u>	<u>COST FACTORS</u>	<u>PRESENT VALUES¹</u>
COLLECTION		
A. <u>Capital Costs</u>		
Sewer system	see Facility Plan, pg. 23	461,875
Engineering & administrative	see Facility Plan, pg. 23	115,125
Service connections	see Facility Plan, pg. 28	69,150
Total present value		646,200
B. <u>Salvage Values</u>		
Sewer system	see R&G ² letter of 8/31/79, pg. 18	(215,960)
Total present value	discount at 7.125% over 20 yrs.	(54,500)
C. <u>Annual O & M Costs</u>		
Average annual O & M	see R&G letter of 8/31/79, pg. 19	5,000
Total present value sum	20 yrs. at 7.125% discount	52,500
D. <u>Total Present Value of Collection Costs</u>		<u>644,200</u>
E. <u>Equivalent Annual Value of Collection Costs</u>		61,400

¹ Rounded to the nearest \$100

² Reiss and Goodness Engineers

TABLE E-2 (Continued)

<u>PROJECT ELEMENT</u>	<u>COST FACTORS</u>	<u>PRESENT VALUES</u>
TREATMENT		
A. <u>Capital Costs</u>		
Force main (transmission system)	see Facility Plan, pg. 21	61,800
Engineering & administrative	see Facility Plan, pg. 21	15,400
LID share of regional treatment plant	see R&G letter of 8/31/79, pg. 15	106,100
Total present value		183,000
B. <u>Salvage Values</u>		
Force main	see R&G letter of 8/31/79, pg. 15	(60,600)
LID share of regional treatment plant	see R&G letter of 8/31/79, pg. 15	(25,300)
Sub-total		(85,900)
Total present value	discount at 7.125% over 20 yrs.	(21,700)
C. <u>Annual O & M Costs</u>		
Average annual O & M	see R&G letter of 8/31/79, pg. 15	4,700
Total present value sum	20 yrs. at 7.125% discount	49,300
D. <u>Total Present Value of Treatment Costs</u>		210,900
E. <u>Equivalent Annual Value of Treatment Costs</u>		20,100
TOTAL PRESENT VALUE		855,100
EQUIVALENT ANNUAL VALUE		81,500

TABLE E-3
PRESENT VALUE
ALTERNATIVE 3 - DOWN-SIZED FACILITY PLAN
PROPOSED PROJECT

PROJECT ELEMENT	COST FACTORS	PRESENT VALUES ¹
COLLECTION		
A. Capital Costs		
Sewer system		
8" sanitary sewer pipe	12,525 l.f. @ \$6/l.f.=75,200	
8" ductile iron, class 50	300 l.f. @ \$14/l.f.=4,200	
12" concrete encasement	950 l.f. @ \$14/l.f.=13,300	
0'-6' trench & backfill	11,145 l.f. @ \$2/l.f.=22,300	
6'-8' trench & backfill	1,045 l.f. @ \$2.50/l.f.=2,600	
8'-10' trench & backfill	485 l.f. @ \$3.25/l.f.=1,600	
10'-12' trench & backfill	150 l.f. @ \$4/l.f.=600	
manholes, constructed	271 l.f. @ \$90/l.f.=24,400	
drop connections	4 each @ \$350/each=1,400	
simplex grinder pumps, complete	8 each @ \$3,000/each=24,000	
standby grinder pump with spare		
cutter impeller	3 each @ \$1,000/each=3,000	
rock excavation	1,100 c.y. @ \$40/c.y.=44,400	
duplex grinder pump, complete	2 each @ \$5,000/each=10,000	
factory built pump station	8 each @ \$18,000/each=144,000	
1½" PVC force main	6,355 l.f. @ \$2.75/l.f.=17,500	
4" PVC force main	6,390 l.f. @ \$4.50/l.f.=28,800	
4" x 8" service branch connection	223 each @ \$25/each=5,600	
2" air release valve	3 each @ \$200/each=600	
1" air release valve	2 each @ \$150/each=300	
asphalt removal & replacement	150 s.y. @ \$15/s.y.=2,300	
Sub-total, sewer system		426,100

¹ Rounded to the nearest \$100

TABLE E-3 (Continued)

<u>PROJECT ELEMENT</u>	<u>COST FACTORS</u>	<u>PRESENT VALUES</u>
Engineering & administrative	25% of sewer system cost	106,500
Service connections		
connections to user's plumbing	217 each @ \$50/each=10,900	
4" service line with trench and backfill	14,100 l.f. @ \$4/l.f.=56,400	
Sub-total, service connections		67,300
Total present value		599,900
 B. <u>Salvage Values</u>		
Sewer system		
8" sanitary sewer pipe	3/5 of cost = 45,100	
8" ductile iron pipe	3/5 of cost = 2,500	
1½" PVC force main	3/5 of cost = 10,500	
4" PCV force main	3/5 of cost = 17,300	
Sub-total, sewer system		(75,400)
Total Present value	discount at 7.125% over 20 yrs.	(19,000)
 C. <u>Annual O & M Costs</u>		
Average annual O & M	see R&G ² letter of 8/31/79, pg. 19	5,000
Total present value sum	20 yrs. at 7.125% discount	52,500
 D. <u>Total Present Value of Collection Costs</u>		633,400
 E. <u>Equivalent Annual Value of Collection Costs</u>		60,400

² Reiss and Goodness Engineers

TABLE E-3 (Continued)

PROJECT ELEMENT	COST FACTORS	PRESENT VALUES
TREATMENT		
A. <u>Capital Costs</u>		
Force main (transmission system)		
4" PVC force main	10,100 l.f. @ \$4.50/l.f.=45,500	
2" air release valve	1 each @ \$200/each=200	
tie to inlet structure	1 l.s. @ \$1,000/l.s.=1,000	
factory built lift station	1 l.s. @ \$25,000/l.s.=25,000	
Sub-total, force main		71,700
Engineering & administrative	25% of transmission system cost	17,900
LID share of regional treatment plant	based on % contribution of LID to wastewater flow and BOD loading	65,000
Total present value		154,600
B. <u>Salvage Values</u>		
Force main		
4" PCV force main	3/5 of cost = 27,300	
2" air release valve	3/5 of cost = 120	
tie to inlet structure	3/5 of cost = 600	
Sub-total, force main		(28,020)
LID share of regional treatment plant	3/5 of LID share of cost	(7,000)
Sub-total		(35,000)
Total Present value	discount at 7.125% over 20 yrs	(8,800)

TABLE E-3 (Continued)

PROJECT ELEMENT	COST FACTORS	PRESENT VALUES
C. <u>Annual O & M Costs</u> Average annual O & M lift station power	based on operating 7.2 hrs/day at 7.94.Kw hr = 150	
lift station maintenance	3% of capital cost/yr = 750	
force main maintenance	1% of capital cost/yr = 490	
LID share of regional plant costs	based on % contribution of LID to w.w. flow & BOD load = 2,930	
Sub-total, average annual O&M		4,300
Total present value sum	20 yrs. at 7.125% discount	45,100
D. <u>Total Present Value of Treatment Costs</u>		190,900
E. <u>Equivalent Annual Value of Treatment Costs</u>		18,200
TOTAL PRESENT VALUE		824,300
EQUIVALENT ANNUAL VALUE		78,600

TABLE E-4
PRESENT VALUE
ALTERNATIVE 4 - DOWN-SIZED TOTAL
RETENTION LAGOON

<u>PROJECT ELEMENT</u>	<u>COST FACTORS</u>	<u>PRESENT VALUES¹</u>
COLLECTION		
A. <u>Capital Costs</u>		
Sewer system	same as Alternate 3	426,100
Engineering & administrative	25% of sewer system cost	106,500
Service connections	same as Alternate 3	67,300
Total present value		599,900
B. <u>Salvage Values</u>		
Sewer system	same as Alternate 3	(75,400)
Total present value	discount at 7.125% over 20 yrs.	(19,000)
C. <u>Annual O & M Costs</u>		
Average annual O & M	see R&G ² letter of 8.31.79, pg. 19	5,000
Total present value sum	20 yrs. at 7.125% discount	52,500
D. <u>Total Present Value of Collection Costs</u>		<u>633,400</u>
E. <u>Equivalent Annual Value of Collection Costs</u>		60,400

1 Rounded to the nearest \$100

2 Reiss & Goodness Engineers

TABLE E-4 (Continued)

PROJECT ELEMENT	COST FACTORS	PRESENT VALUES
TREATMENT		
A. <u>Capital Costs</u>		
Lagoon		
soil excavation	70,568 c.y. @ \$1.10/c.y. = 77,600	
rock excavation	70,654 c.y. @ \$5/c.y.=353,300	
land	20 acres @ \$750/acre=15,000	
inlet wier	1 each @ \$1,500/each=1,500	
pond transfer	3 each @ \$1,700/each=5,100	
fence	3,732 l.f. @ \$2.75/l.f.=10,300	
force main	2,434 l.f. @ \$4.50/l.f.=11,000	
lift station	1 each @ \$20,000/each=20,000	
Sub-total, lagoon		493,800
Engineering & administrative	25% of lagoon cost	123,500
Total present value		617,300
B. <u>Salvage Values</u>		
Land	appreciates 3% annually, compounded over 20 yrs.	(27,100)
Force main	3/5 of cost	(6,600)
Sub-total		(33,700)
Total present value	discount at 7.125% over 20 yrs.	(8,500)

TABLE E-4 (Continued)

<u>PROJECT ELEMENT</u>	<u>COST FACTORS</u>	<u>PRESENT VALUES</u>
C. <u>Annual O & M Costs</u>		
Average annual O & M		
lift station maintenance	3% of capital cost/yr = 600	
lift station repairs	S&P estimate = 600	
force main maintenance	1% of capital cost/yr = 110	
labor	1.75 hrs/day x 365 @ \$15/hr = 9,581	
Sub-total, O&M		11,000
Total present value sum	20 yrs at 7.125% discount	115,400
D. <u>Total Present Value of Treatment Costs</u>		<u>724,200</u>
E. <u>Equivalent Annual Value of Treatment Costs</u>		69,000
TOTAL PRESENT VALUE		1,357,600
EQUIVALENT ANNUAL VALUE		129,400

3 Sverdrup & Parcel and Associates, Inc.

TABLE E-5
PRESENT VALUE
ALTERNATIVE 5 - LIMITED PUBLIC
ON-SITE SYSTEMS

<u>PROJECT ELEMENT</u>	<u>COST FACTORS</u>	<u>PRESENT VALUES</u> ¹
TREATMENT		
A. <u>Capital Costs</u>		
Pumpout trucks		
truck #1	1980 price = 80,000; see ref. 73	
replacement for truck #1	P.V. of 1990 price = 40,200; ref. 73	
truck #2	P.V. of 1988 price = 46,100; ref. 73	
replacement for truck #2	P.V. of 1998 price = 23,200; ref. 73	
Sub-total, pumpout trucks		189,500
Replace holding tanks	5 tanks @ \$700/tank	3,500
Engineering & administrative	25% of capital cost P.V.'s above	48,300
Total present value		241,300
B. <u>Salvage Values</u>		
Pumpout truck #2	P.V. of 8/10 of 1998 cost	(16,200)
C. <u>Annual O & M Costs</u>		
Dumping, repair, labor, gas	based on uniform cost gradients; see ref. 74	634,000
Insurance	P.V. over 20 yrs. of \$500/yr/ truck	7,500
Installation of holding tanks	P.V. over 20 yrs of 3.45 tanks/ yr @ \$700/tank	25,300

¹ Rounded to the nearest \$100

TABLE E-5 (Continued)

<u>PROJECT ELEMENT</u>	<u>COST FACTORS</u>	<u>PRESENT VALUES</u>
C. <u>Annual O & M Costs</u> (Continued)		
Installation of septic tanks	P.V. over 20 yrs. of 0.45 tanks/ yr. @ \$1,100/tank	5,100
Total present value		671,900
 TOTAL PRESENT VALUE		 <u>897,000</u>
EQUIVALENT ANNUAL VALUE		85,500

TECHNICAL REPORT DATA <i>(Please read Instructions on the reverse before completing)</i>		
1. REPORT NO. EPA 907/9-80-022	2.	3. RECIPIENT'S ACCESSION NO.
4. TITLE AND SUBTITLE Final Environmental Impact Statement, Proposed Sewerage Facilities, Marion County Lake Improvement District, Marion County, Kansas	5. REPORT DATE Date of Issue	
	6. PERFORMING ORGANIZATION CODE	
7. AUTHOR(S) EPA Region VII Barbara Bowerman, Norman Crisp	8. PERFORMING ORGANIZATION REPORT NO.	
9. PERFORMING ORGANIZATION NAME AND ADDRESS U.S. Environmental Protection Agency, Region VII 324 E. 11th Street Kansas City, Missouri 64106	10. PROGRAM ELEMENT NO.	
	11. CONTRACT/GRANT NO.	
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	14. SPONSORING AGENCY CODE	
15. SUPPLEMENTARY NOTES		
16. ABSTRACT <p>The Final Environmental Impact Statement examined five alternatives for the improvement of sewerage facilities in the Marion County Lake Improvement District, Marion County, Kansas. The environmental, social, and economic impacts of each of these alternatives were evaluated, along with appropriate mitigation measures. Based upon extensive field investigations, EPA has determined that sufficient water quality problems do not exist to merit funding under the Construction Grants program of the Clean Water Act of 1977, and therefore, no further grant will be awarded for this project.</p>		
17. KEY WORDS AND DOCUMENT ANALYSIS		
a. DESCRIPTORS	b. IDENTIFIERS/OPEN ENDED TERMS	c. COSATI Field/Group
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