



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 30 2014

REPLY TO THE ATTENTION OF

Ms. Anne Haaker, SHPO/Deputy Director
Illinois Historic Preservation Agency
1 Old State Capitol Plaza
Springfield, Illinois 62701-1512

Re: Consultation Under Section 106 of the National Historic Preservation Act for an Air Permitting Project Proposed by the Phillips 66 Company

Dear Ms. Haaker:

The U.S. Environmental Protection Agency has reviewed the cultural resources assessment for the Phillips 66 Company, Wood River Refinery Coker and Refinery Expansion (CORE) Project. The proposed project requires a federal air permit under the Prevention of Significant Deterioration of air quality (PSD) permitting program, 40 C.F.R. § 52.21. EPA has delegated to the Illinois Environmental Protection Agency (IEPA) authority to issue PSD permits in Illinois.

In accordance with the provisions of the National Historic Preservation Act (NHPA), EPA has determined that the proposed project is an "undertaking" as defined in 36 C.F.R. § 800.16(y). Consequently, EPA has initiated the Section 106 review process. The purpose of this letter is to (1) provide an overview of the undertaking; (2) describe the Area of Potential Effects (APE) and present EPA's findings regarding historic properties located within that area; and (3) request your concurrence on our determination that no historic properties will be adversely affected by the project.

Overview of the Undertaking

The Phillips 66 Company is proposing to construct new emission units and to modify existing emission units at the Wood River Refinery (WRR) to increase both the total crude processing and percentage of heavy crude at the refinery. The expansion includes installation of a new boiler, two new fractionation columns, a new cooling tower, three new storage tanks, and modifications to an existing fractionation column. The project is subject to federal air permitting requirements under the PSD program due to its projected emissions of carbon monoxide emissions. As required by the PSD program, the project will undergo an air quality analysis to

ensure protection of air quality. Therefore, the project is not expected to have any adverse effects on air quality.

Area of Potential Effects

For purposes of this undertaking, the APE is the geographic area or areas where the proposed CORE project may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. 36 C.F.R. § 800.16(d). EPA has determined the APE for this undertaking to be the area within a one-mile radius of the project site. In accordance with 36 C.F.R. § 800.4(b)(1), EPA and the applicant have taken "reasonable and good faith" efforts to identify historic properties within the APE. The applicant has identified through research done on the internet evidence regarding "potential" National Register eligible sites; however, none of these properties are listed in the National Register of Historic Places.

Finding of No Adverse Effect

Pursuant to 36 C.F.R. § 800.5(b), EPA is making a determination of "No Adverse Effect" for the undertaking. For those properties that are identified by the applicant as being "potential" National Register eligible sites, the undertaking's effects do not meet the criteria specified in 36 C.F.R. § 800.5(a)(1). Specifically, EPA has determined that the undertaking will not alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. The project will not cause any of the adverse effects listed at 36 C.F.R. § 800.5(a)(2). In particular, the project will not cause physical destruction or damage to any part of a listed or eligible property within the APE, and the increase in emissions due to the project will not introduce visual or atmospheric elements that diminish the integrity of any property's significant historic features.

By this letter, EPA is fulfilling its obligations pursuant to Section 106 of the NHPA for the Phillip 66 Company's, WRR CORE project permitting action that is currently before IEPA. If you have any questions with respect to this letter or disagree with this determination, please contact me at (312) 353-4761, or Danny Marcus, of my staff, at (312) 353-8781.

Sincerely,



Genevieve Damico

Chief

Air Permits Section

Enclosure: Phillips 66 Company NHPA Section 106 Assessment

MAY 15 2014



Wood River Refinery
P. O. Box 76
900 South Central Avenue
Roxana, Illinois 62084

May 13, 2014

Ms. Anne E. Haaker
Deputy State Historic Preservation Officer
Preservation Services Division
Illinois Historic Preservation Agency
One Old State Capitol Plaza
Springfield, IL 62701-1507

**RE: WRB Refining LP Wood River Refinery
Coker and Refinery Expansion (CORE) Construction Permit Application – Revision
National Historic Preservation Act Section 106 Assessment**

Dear Ms. Haaker:

WRB Refining LP (WRB) owns the Wood River Refinery (WRR) located in Hartford and Roxana, Illinois. Phillips 66 Company (Phillips 66) operates the WRR. The WRR obtained Prevention of Significant Deterioration (PSD) permit 06050052 from the Illinois Environmental Protection Agency (IEPA) on August 5, 2008 to construct new emission units and to modify existing emission units at the refinery to increase both the total crude processing and percentage of heavier crude at the Wood River Refinery. This project was referred to as the Coker and Refinery Expansion (CORE) Project. Concurrently, the Hartford Terminal obtained permit 06110049 to install additional tankage to support the CORE Project.

WRR and the Hartford Terminal have recently applied to IEPA for certain permit revisions to reflect equipment changes (related to as-received crude containing less heavy gas oil and more lighter oils), minor technical corrections and clarifications, and an update to the sulfur dioxide (SO₂) emission estimating method. This CORE Permit Revision will result in a decrease in pollutant emissions from those permitted as part of the original CORE Project. In accordance with the Illinois State Agency Historic Resources Preservation Act and Section 106 of the National Historic Preservation Act, Phillips 66 has completed a cultural resource assessment related to the CORE Permit Revision to determine what impact there may be on listed or eligible historic properties.

The proposed CORE Permit Revision includes installation of a new boiler, two new fractionation columns, a new cooling tower, three new storage tanks, and modifications to an existing fractionation column. Figure 1 shows the proposed location of each of these pieces of equipment. A review of historical refinery plot plans and photographs, indicates these sites have been in industrial use for many years. The WRR began operation in 1918. Since that time, the refinery has undergone numerous upgrades and expansions. At the outbreak of World War II, the WRR was asked by the United States Government to double aviation fuel capacity to support the war effort. The new fractionation columns and cooling water tower associated with the CORE Permit Revision

will be located at the previous aviation fuel tank farm, which dates back to the early 1940s. The two new tanks to be added at the main refinery for the CORE Permit Revision will be constructed at previous tank sites. The new boiler will be located adjacent to existing boilers in an area that has housed refinery utility boilers for more than 50 years. Changes to the existing Straight Run Deisobutanizer (SRDIB) column will not require soil disturbance. A third storage tank will be located at the Hartford Terminal, which is located about two miles south of the main refinery site. The terminal was constructed in the 1950s. The new Terminal tank associated with the CORE Permit Revision will be constructed on Terminal property adjacent to existing tanks.

In addition to proposed new equipment locations, Figure 1 indicates two areas of archaeological interest identified during site investigations for previous construction projects.¹ WRB has filed a preservation covenant for certain of these sites and an existing refinery procedure stipulates protective requirements for both areas. None of the equipment associated with the CORE Permit Revision will be located in these protected areas.

Figure 2 is a map showing the location of historically significant sites with relationship to the refinery. The map was originally generated from a National Park Service National Register of Historic Places database search. The two historic places closest to the refinery on the National Register, the Bethalto Village Hall and The Upper Alton Historic District, are four to five miles from the refinery. Additional National Register sites in these two communities and in the Edwardsville area are located even further from the refinery. An internet search for potential National Register eligible sites in communities adjacent to the refinery (Roxana, South Roxana, Hartford, and Wood River) was also conducted. The Wood River Heritage Council website (<http://www.woodriverheritage-council.org/>) contained information on three additional historically significant sites in the vicinity of the refinery. These include the Lewis and Clark State Historical Site, also known as Camp DuBois, the location where the Lewis and Clark expedition wintered in 1803-1804 prior to setting out on their exploration of the Louisiana Purchase Territory. This site is about two miles from the main refinery and one mile from the new tank to be added at the Hartford Terminal. The St. Paul Wedding Chapel and Vaughn Cemetery are located in Wood River, Illinois about two miles from the refinery.

Based on the results of this historical property research, we have determined that the proposed construction areas are previously developed industrial sites and the CORE Permit Revision construction activities will not impact any areas of historical significance.² WRB requests concurrence from IHPA that there are no adverse cultural resource effects associated with the proposed CORE Permit Revision and requests that permitting and construction of the CORE Permit Revision be allowed to proceed without further investigation.

Standard emergency discovery procedures are in place and will be followed if historical artifacts are discovered during the construction phase.

¹ Three areas of interest (11MS109, 11MS1770, and 11MS2302), covered by a September 23, 2008 preservation covenant, were identified during the June/July 2008 archaeological investigation for CORE project access. Three areas of interest (11MS2280, 11MS2286, and 11MS2287) were identified during the October 2007 investigation for Keystone pipeline easements.

² The Air Quality Analysis completed as part of the CORE Permit Revision application to the IEPA concluded that no regulated New Source Review (NSR) pollutants would have any significant ambient impact. All regulated NSR pollutants except carbon monoxide (CO) would decrease as a result of the proposed CORE Project Revision, and CO emissions did not have a significant ambient impact.

If you have any questions about this report, please contact Dana French at 618-255-2418.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Wulf". The signature is written in a cursive, flowing style.

Brian J. Wulf
Environmental Director

Attachments

CC: David Ogulei
U.S. Environmental Protection Agency – Region 5
Air and Radiation Division – AR-18J
77 West Jackson Blvd
Chicago, IL 60604

Jason Schnepf
Illinois Environmental Protection Agency
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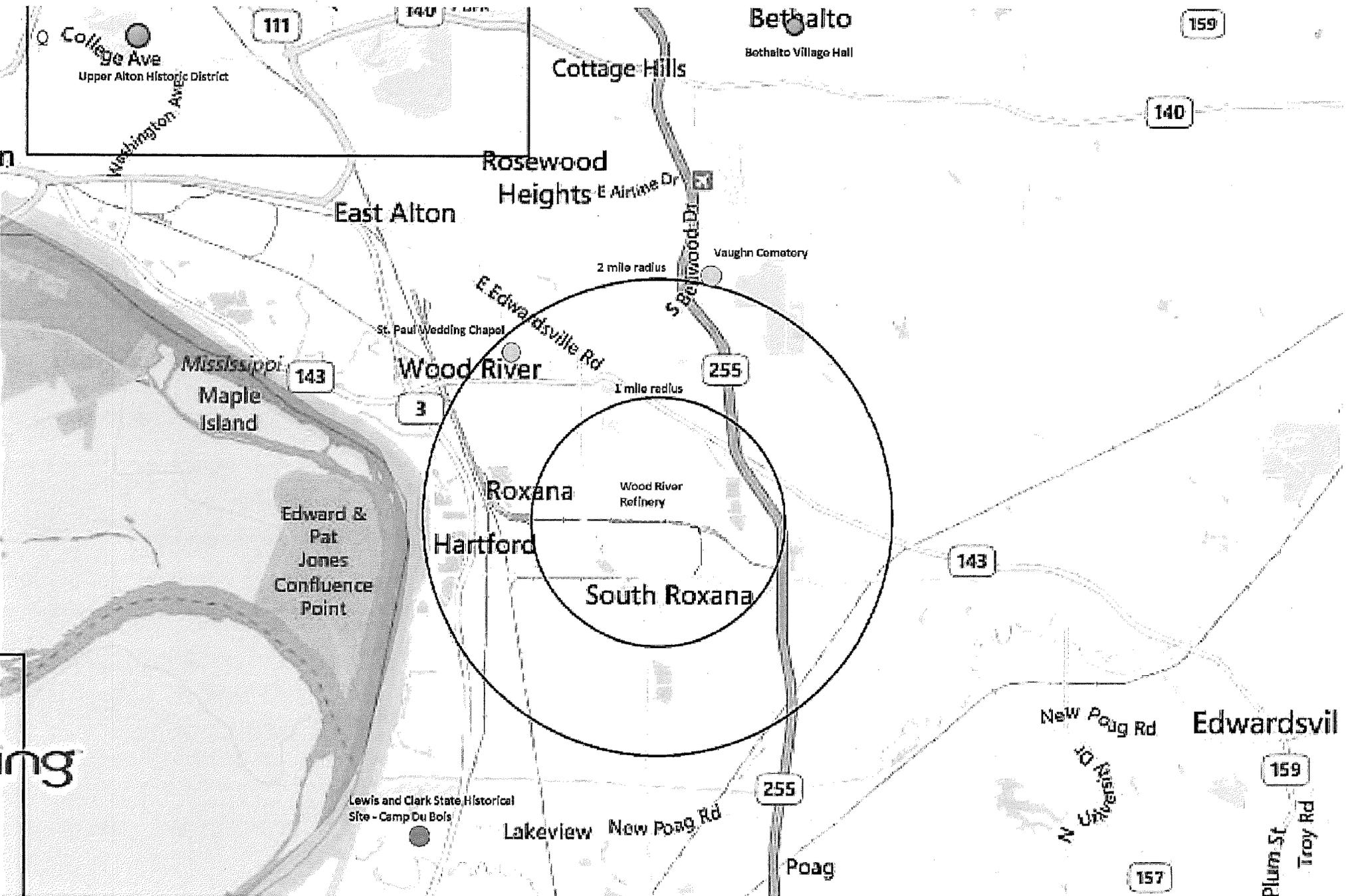


Figure 2 - Historically Significant Sites

7 (over) MEMBER
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~NOTICE~
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