



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 21 2009

REPLY TO THE ATTENTION OF:

(AR-18J)

Richard Nelson, Field Supervisor
Rock Island Illinois Field Office
United States Fish and Wildlife Service
1511 47th Avenue
Moline, Illinois 61265

Dear Mr. Nelson:

On June 17, 2008, our offices concluded an informal consultation process for a Prevention of Significant Deterioration permit related to a planned expansion at the Washington Mills Hennepin, Inc. facility located in Hennepin, Illinois. On January 6, 2009, RK & Associates, Inc., informed the U.S. Environmental Protection Agency that particulate matter emissions allowed by the permit would be higher than the levels previously considered. RK & Associates, Inc., have provided revised modeling for the 3 hazardous pollutants impacted by this change, aluminum, nickel, and vanadium. The results of the modeling are enclosed with this letter.

The revised Hazardous Air Pollutant impacts show a potential exceedence of the surface water benchmark for aluminum, the sediment benchmark for nickel, and the soil benchmark for plants for vanadium.

Aluminum: The modeling performed by RK & Associates shows that project impacts plus existing background will exceed the benchmark for surface water. The project contribution of aluminum is approximately 0.007% of background and 0.08% of the benchmark for this pollutant. The project impacts are insignificant in comparison to existing background. It would not likely be possible to measure or detect any negative response to an endangered species in response to the project contribution.

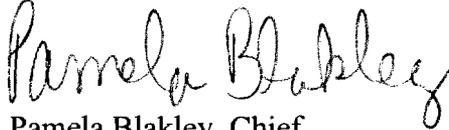
Nickel: The modeling performed by RK & Associates shows that project impacts plus existing background will exceed the benchmark for sediment. The project contribution of nickel is approximately 0.03% of background and 0.07% of the benchmark. The project impacts are insignificant in comparison to existing background. It would not likely be possible to measure or detect any negative response to an endangered species in response to the project contribution.

Vanadium: The analysis performed by RK & Associates shows that the soil benchmark for plants will be exceeded. This is due to the background assumed. Project

contributions of vanadium are approximately 9.4% of the assumed background and exceed the benchmark; however, the assumed benchmark for plants may be very conservative. Adequate research was not available for EPA to derive an Ecological Soil Screening Level for vanadium. The available studies showed a no observed adverse effect concentration of 100 mg/kg, considerably higher than the assumed benchmark of 1.59 mg/kg. Based on this information, EPA believes that it would not likely be possible to measure or detect any negative response to an endangered species in response to the project contribution.

Based on the information available, EPA finds that the proposed changes at Washington Mills Hennépin, Inc., may affect, but are not likely to adversely affect any endangered or threatened species. If you have any questions, please contact Rachel Rineheart of my staff at 312-886-7017.

Sincerely,

A handwritten signature in black ink that reads "Pamela Blakley". The signature is written in a cursive, flowing style.

Pamela Blakley, Chief
Air Permits Section

Enclosure

cc: Laurel Kroak, IEPA