



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

AUG 25 2015

REPLY TO THE ATTENTION OF:

Ms. Amy Martin, SHPO/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 Viscofan USA, Inc.**

Dear Ms. Martin:

The U.S. Environmental Protection Agency has reviewed the cultural resources assessment for the proposed Viscofan USA, Inc. Process Machine (PM) expansion. The proposed project, to be located at 915 N. Michigan Ave, Danville, IL 61832, 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.

Pursuant to the National Historic Preservation Act (NHPA), EPA, in its capacity as the "agency official" for the proposed permitting action, has determined that the proposed project is an "undertaking" as defined in 36 C.F.R. § 800.16(y). In addition, Viscofan USA has submitted the enclosed letter dated May 8, 2015, from Rachel Leibowitz, Illinois Deputy State Historic Preservation Officer, to Democritos Tsellos, Sage Environmental Consulting, determining that no historic properties will be affected by the project. The purpose of this letter is to fulfill EPA's obligation under 36 C.F.R. § 800.3 by presenting our independent finding that no historic properties will be adversely affected by the project. Consistent with 36 C.F.R. § 800.3(c)(4), EPA intends to proceed to the next step in the permitting process based on the above finding unless we receive an objection from you within 30 days of receipt of this letter.

### **Overview of the Undertaking**

Viscofan USA is proposing to expand its existing facility by modifying all ten of its process machines. The purpose of the project is to increase the production capacity of the facility. The project is subject to federal air permitting requirements under the PSD program due to its projected emissions of volatile organic compound (VOC) and total reduced sulfur (TRS)

emissions. As required by the PSD program, the project has undergone an air quality analysis to ensure protection of air quality.

### **Area of Potential Effects**

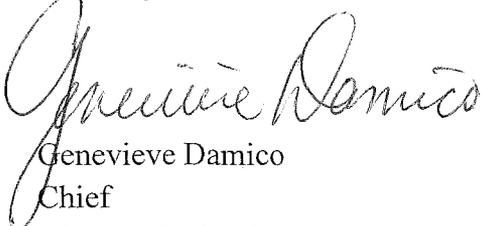
For purposes of this undertaking, the Area of Potential Effects (APE) is the geographic area or areas where the proposed PM expansion project may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. *See* 36 C.F.R. § 800.16(d). EPA has 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. Based on these efforts, EPA finds that there is at least one “eligible” building/site that is located within the APE.

### **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 because 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.

This letter fulfills EPA’s obligations under Section 106 of the NHPA for the Viscofan USA 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