

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
AIR AND RADIATION DIVISION
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MEMORANDUM

SUBJECT: National Historical Preservation Act (NHPA) "No Potential To Cause Effects"
Determination for G&K Services, Inc. Permit Actions

FROM: Michael Langman
Environmental Scientist

TO: Genevieve Damico
Section Chief
Air Permits Section

On September 24, 2013, EPA called Mr. Jim Draeger of the Wisconsin Historical Society to determine how to comply with the federal consultation requirements of section 106 of the NHPA and the implementing regulations at 36 C.F.R. 800 for the G&K Services, Inc. synthetic minor construction and operating permit actions. According to information available to EPA, specifically through the website <http://www.achp.gov/programs.html>, Mr. Draeger is the Wisconsin state historical preservation officer (SHPO). A voicemail message was left with Mr. Draeger requesting that he contact EPA to discuss section 106 responsibilities. On September 26, 2013, Mr. Sherman Banker returned the phone call on behalf of Mr. Draeger. Since the call was being returned on behalf of Mr. Draeger in regards to section 106 of NHPA, EPA believes that Mr. Banker was acting as a designated representative of the Wisconsin SHPO as defined at 36 C.F.R. § 800.16(v).

EPA explained to the SHPO that G&K Services, Inc., an industrial laundry facility, applied for a part 49 synthetic minor construction permit for its existing facility at 800 Isbell Street in Green Bay, Wisconsin, and that the facility is located on the Oneida Nation of Wisconsin's tribal reservation. The facility is an existing facility that has been operating since 1981. Since 2003, the state of Wisconsin has issued several construction and operating permits to the facility. The facility applied for a federally-issued construction permit only after discovering that it is located on a tribal reservation and that the EPA is the permitting authority, not the state. The permit will establish federally-enforceable synthetic minor emission limits for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) for the facility. In addition, the permit authorizes G&K Services to replace certain existing emission units with new emission units. Installation of the emission units will not require expanding the facility, modifying the existing footprint of the facility, or result in an increase of emissions.

After considering all of this information, the SHPO determined that this undertaking will not have the potential to cause an effect on historic properties. The SHPO explained that the project in this permit is not going to break new ground to construct new facilities, expand the current footprint of the facility, or otherwise cause a change to any historical property. For these reasons, this undertaking would have no potential to cause an effect on historic properties.

Therefore, based on this discussion, EPA has determined that this undertaking, as defined at 36 C.F.R. § 800.16(y), has “no potential to cause effects” on historic properties. Pursuant to 36 C.F.R. § 800.3(a)(1), EPA has no further obligations under section 106 of the NHPA for this permit action.

Although there is no further obligation under section 106 of the NHPA, EPA is providing additional information in the permitting record to further demonstrate that this project will have no potential effect on historic properties. The facility is physically located within an area that has been zoned as a business park by the city of Green Bay. As a result, several businesses and many access roads, including an interstate highway, already exist within the area surrounding the facility. Additionally, the nearest property listed on the National Register is more than 2 miles away, with several other listed historic properties more than 3 miles away. These listed historic properties are in areas that are more heavily developed than the facility’s location.

Since the permit is being issued to limit the potential emissions of the facility and to allow the replacement of emission units that results in the decrease of the potential to emit pollutants from the facility, this permit action will neither directly nor indirectly have the potential to cause effects on historic properties. Additional supporting information, such as a map of the area with historic properties marked and a list of historic properties in Brown County, are included with this memorandum.

Attachments