

US EPA ARCHIVE DOCUMENT

30 June 2011

Mark Denton  
 Texas Historical Commission  
 P.O. Box 12276  
 Austin, TX 78711

NO HISTORIC  
 PROPERTIES AFFECTED  
 PROJECT MAY PROCEED  
 by [Signature]  
 for Mark Wolfe  
 State Historic Preservation Officer  
 Date 12 July 2011

RE: Request for Concurrence – Finding of No Effect to Archaeological and Historic Resources Associated with Furnace Expansion Project in Jefferson County, Texas  
 WGI Project No. 1125

Mr. Denton:

On behalf of BASF FINA Petrochemicals, Whitenton Group, Inc. (WGI) is submitting the enclosed information and request for review for a furnace expansion project in Jefferson County, Texas. The purpose of the project is to add a tenth furnace to the nine furnaces currently in operation at the ethylene cracker facility adjacent to the TOTAL Port Arthur Refinery in Port Arthur, Texas (Figure 1). The proposed project is located approximately 0.4 mile north-northeast of the intersection of Farm to Market Road 366 and State Highway 73.

Project location information:

USGS Quad	Latitude/Longitude
Port Arthur North	N29° 57' 14.11" W93° 53' 02.26"

Construction for the proposed furnace expansion will take place within the existing facility. The furnace will be built on an existing concrete slab. The existing concrete slab will be demolished to allow installation of auger cast concrete piles and a new mat and pier foundation for the furnace. The proposed construction activities include the installation of approximately 100 steel-reinforced concrete piles, 18-inches in diameter, installed to a depth of 50 feet within a 40-foot by 80-foot area. The construction area is shown on Figure 2.

3413 Hunter Road • San Marcos, Texas 78666 • office 512-353-3344 • fax 512-212-4043

[www.whitentongroup.com](http://www.whitentongroup.com)

# Whitenton Group, Inc.

ENVIRONMENTAL CONSULTANTS

The results of the cultural resources archival review, conducted by Horizon Environmental Services, Inc., indicated the following: "any cultural resources that may have existed within the Project Area would have been effectively destroyed via prior construction of the plant," "no potential exists for intact cultural resources, prehistoric or historic, to exist within the project area," and "no further cultural resources investigations would appear to be warranted".

The proposed furnace expansion project will require a Prevention of Significant Deterioration Permit from the Environmental Protection Agency. The proposed project will not require a Section 404/10 Permit from the US Army Corps of Engineers. WGI is seeking concurrence from the THC that the proposed furnace expansion construction activities will have *no effect* on archaeological and/or historical resources. I have attached two figures (location maps), photos of the expansion area, and the Cultural Resources Archival Review Letter Report. Please call me at 512.353.3344 if you have any questions or need additional information.

Sincerely,



Jayme A. Shiner

Enclosed:

Figure 1 Project Location

Figure 2-Construction Area

Cultural Resources Archival Review Letter Report

30 June 2011

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Texas Historical Commission  
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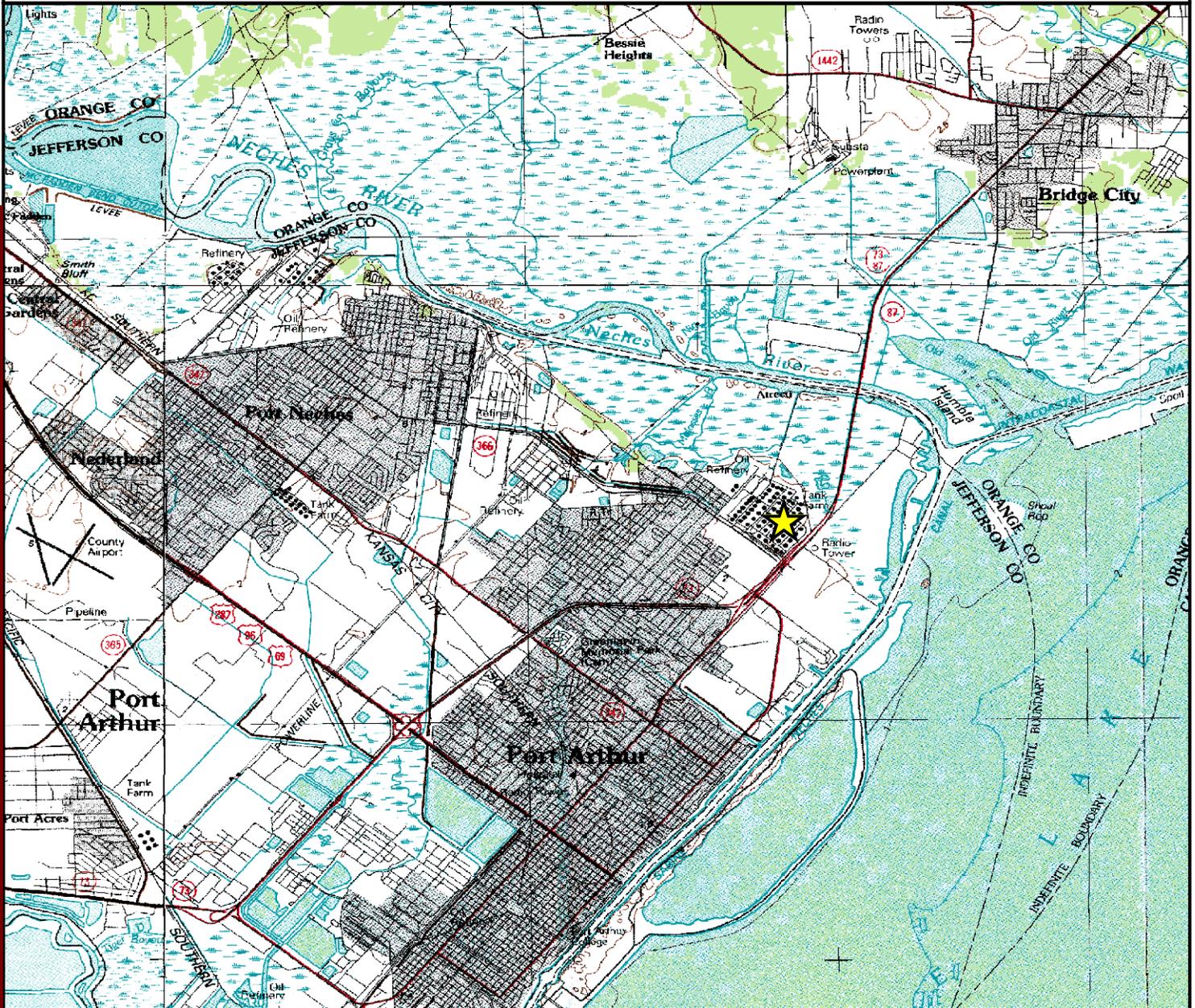
Enclosed:

Figure 1 Project Location

Figure 2 Construction Area

Cultural Resources Archival Review Letter Report

**Figure 1**  
**Project Location**  
**BASF FINA Furnace Expansion Project**  
**Jefferson County, Texas**



**US EPA ARCHIVE DOCUMENT**



★ Project Location



Background Resources:  
 USGS 100K DRG  
 Port Acres, Beaumont East  
 Port Arthur North, Terry

Surveyor(s):  
 Jayme Shiner

Project Number and Information:  
 1125  
 BASF FINA Furnace Expansion  
 Biological Assessment

**Whitenton Group, Inc.**  
 ENVIRONMENTAL CONSULTANTS

3413 Hunter Road San Marcos Texas 78666

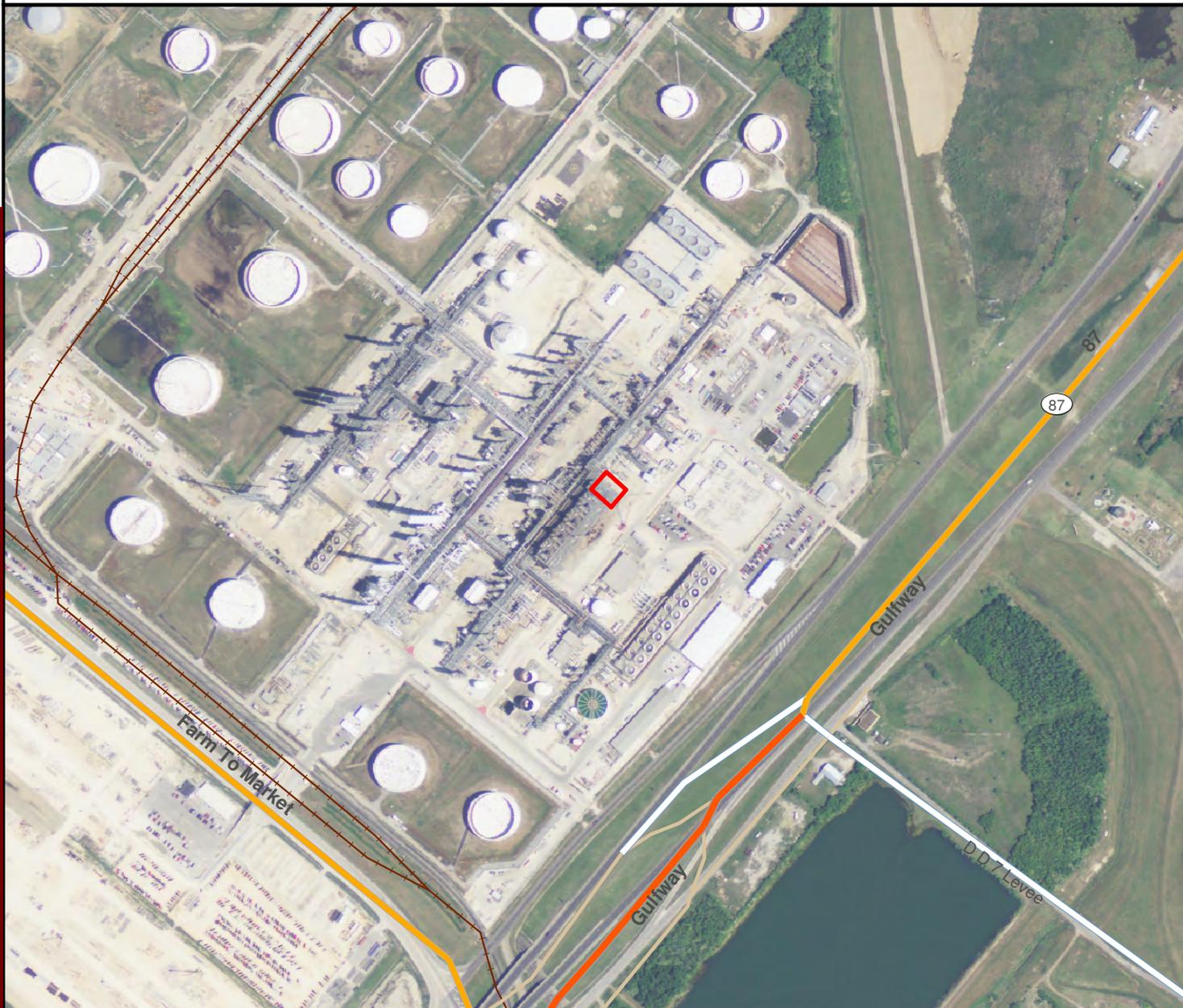
GPS and Coordinate Type:  
 Trimble Geo XT  
 UTM NAD 1983  
 Zone 15 North

Map Created:  
 06/28/2011 by Jayme Shiner

0 3,750 7,500 15,000 Feet



**Figure 2**  
**Construction Area**  
**BASF FINA Furnace Expansion Project**  
**Jefferson County, Texas**



— Interstate Highway

— County Road

□ Construction Area  
 (~0.2 Acres)

Background Resources:  
 USGS 1 Meter DOQQ (2010)  
 Port Arthur North (NE)  
 ESRI Maps  
 StreetMap USA (2006)

Surveyor(s):  
 Jayme Shiner

Project Number and Information:  
 1125  
 BASF FINA Furnace Expansion  
 Biological Assessment

*Whitenton Group, Inc.*  
 ENVIRONMENTAL CONSULTANTS

3113 Hunter Road San Marcos Texas 78666

GPS and Coordinate Type:  
 Trimble Geo XT  
 UTM NAD 1983  
 Zone 15 North

Map Created:  
 6/28/2011 by Jayme Shiner



BASF FINA Furnace Expansion Project

6/21/2011

Jefferson County, TX

View: East view of the proposed construction area and adjacent structure.



BASF FINA Furnace Expansion Project

6/21/2011

Jefferson County, TX

View: South view of the proposed construction area and adjacent structure.



BASF FINA Furnace Expansion Project

6/21/2011

Jefferson County, TX

View: North view of the proposed construction area and adjacent structure.



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BASF FINA Furnace Expansion  
Project

6/21/2011

Jefferson County, TX

View: West view of the proposed  
construction area and adjacent  
structure.



BASF FINA Furnace Expansion  
Project

6/21/2011

Jefferson County, TX

View: West view of the area  
surrounding the proposed  
construction location and existing  
furnaces.





Environmental Services, Inc.

21 June 2011

Mr. Scott Jecker CWB, PWS  
Whitenton Group, Inc., Environmental Consultants  
3413 Hunter Road  
San Marcos, Texas 78666  
swjecker@whitentongroup.com

**Re: Cultural Resources Archival Review  
BASF FINA Petrochemical Plant Improvements Project  
Port Arthur, Jefferson County, Texas  
HJN 110012 AR 05**

Dear Scott,

Horizon Environmental Services, Inc. (Horizon), has completed the requested cultural resources archival review of the proposed BASF FINA Petrochemical Plant Improvements Project in Port Arthur, Jefferson County, Texas (Project Area). The results are presented below.

Archival research conducted via the Internet at the Texas Historical Commission's (THC's) *Texas Archeological Sites Atlas* (Atlas) website indicated the presence of no previously recorded archeological sites or cemeteries within a 1.0-kilometer radius of the Project Area. Similarly, a review of the National Park Service's (NPS) National Register of Historic Places (NRHP) Google Earth map layer indicated the presence of no historic properties or historic districts listed on the NRHP within the review radius. No previously recorded archeological sites, cemeteries, or historic properties, including any listed on the NRHP, are located within or immediately adjacent to the boundaries of the Project Area. Based on the Atlas database, no previous cultural resources surveys have been undertaken with the boundaries of the current Project Area.

Prehistoric archeological sites are commonly found in upland areas and on alluvial terraces near stream/river channels or drainages. Other things being equal, based on the location of the Project Area in a lowland area near the mouth of the Neches River to the northeast and the Gulf of Mexico shoreline to the east, it is Horizon's opinion that there exists a moderate to high potential for undocumented prehistoric cultural resources within the Project Area.

In regard to historic-era resources, the absence of any visible residential structures in proximity to the Project Area on the relevant topographic quadrangle and on Google Earth suggests a low potential historic-era standing structures or cultural deposits within the Project Area.

However, the Project Area consists of a developed petrochemical plant, and the proposed undertaking would involve adding a new furnace within the construction footprint of the existing

**CORPORATE HEADQUARTERS**

1507 South IH 35 ★ Austin, Texas 78741 ★ 512.328.2430 ★ Fax 512.328.1804 ★ [www.horizon-esi.com](http://www.horizon-esi.com)  
**Certified SBE/DBE/HUB**

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facility. As such, any cultural resources that may have existed within the Project Area would have been effectively destroyed via prior construction of the plant. It is therefore Horizon's opinion that there exists effectively no potential for intact cultural resources to exist within the project area and that the proposed undertaking would have no potential to adversely affect any significant cultural resources.

According to Section 106 of the National Historic Preservation Act (NHPA) of 1966, if any federal agency permits, federal loans, or loan guarantees are required for the development of the Project Area, including permits issued by the US Army Corps of Engineers (USACE), additional efforts to identify and/or assess potential impacts to cultural resources may be required by permitting agencies. Specific to the use of Nationwide Permits issued by the USACE, Special Condition 18(c) of the 2007 Nationwide Permits General Conditions requires non-federal permittees to notify the USACE under the Pre-Construction Notification (PCN) procedures if a proposed project subject to Section 404 jurisdiction may have the potential to cause effects to any historic properties listed on, determined to be eligible for listing on, or potentially eligible for listing on the NRHP, including previously unidentified properties. In order to make this determination, the USACE may require a cultural resources survey in the immediate vicinity of any 404 regulated activity if at least a moderate potential exists for the occurrence of prehistoric or historic properties.

However, considering the extent of existing impacts within the Project Area resulting from prior construction of the petrochemical plant, it is Horizon's opinion that no potential exists for intact cultural resources, prehistoric or historic, to exist within the Project Area. As such, no further cultural resources investigations would appear to be warranted in connection with the proposed undertaking.

Should you have any questions, please do not hesitate to call me at (512) 328-2430.

Sincerely,



Russ Brownlow, MA, RPA  
Principal / Cultural Resources Director  
Horizon Environmental Services, Inc.

References:

*(Atlas) Texas Archeological Sites Atlas Restricted Database.* Texas Historical Commission. <http://www.pedernales.thc.state.tx.us/>. Accessed 21 June 2011.

National Park Service's National Register of Historic Places Google Earth Map Layer – South Region. [http://nrhp.focus.nps.gov/natreg/docs/Google\\_Earth\\_Layers.html](http://nrhp.focus.nps.gov/natreg/docs/Google_Earth_Layers.html). Accessed 21 June 2011.

