

US EPA ARCHIVE DOCUMENT



January 13, 2014

CERTIFIED LETTER - RETURN RECEIPT REQUESTED

Mr. A.C. Dumauual
U.S. Environmental Protection Agency
Multimedia Planning and Permitting Division
Mail Code 6PD-R
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

**Re: Occidental Chemical Corporation (OxyChem) Ingleside Ethane Cracker Facility
Greenhouse Gas (GHG) Prevention of Significant Deterioration (PSD) Permit**

Dear Mr. Dumauual,

As follow-up to our conversation on January 8, 2014, OxyChem herein submits to the U.S. Environmental Protection Agency (USEPA) relevant documentation demonstrating the proposed construction and operation of the subject Ingleside Ethane Cracker Facility, located in San Patricio County, Texas, will have “no effect” on archaeological or historic resources eligible for listing on the National Register of Historic Places in compliance with Section 106 of the National Historic Preservation Act.

The Ingleside Ethane Cracker Facility will be located on a 264.61-acre site and consist of five cracking furnaces, two thermal oxidizers, a high pressure ground flare, an emergency generator, a firewater pond, a five cell cooling tower, and sixteen storage vessels (4 – pressure vessels, 10 – low pressure vessels, and 2 – atmospheric tanks). The cultural resource area of potential effect (APE) for the Ingleside Ethane Cracker Facility will be located, and is entirely encompassed, within the APE of the previously-proposed OxyChem Ingleside Fractionator Facility as represented in the report: *Cultural Resources Management Survey and Consultation for the Occidental Chemical Corporation Ingleside Fractionator Site in San Patricio County, Texas* (final report on file with the USEPA and Texas Historical Commission [THC]). A figure depicting the relevant locations of the Ingleside Ethane Cracker Facility Site APE and Ingleside Fractionator Facility APE is provided as Attachment A.

On September 5, 2012, the THC issued concurrence with the above-referenced report findings and determined no further cultural resource investigations were required within the 202 hectare (499 acre) Ingleside Fractionator Facility APE. A copy of this THC concurrence is provided as Attachment B.

We appreciate your assistance in the evaluation of the proposed Project. If you have any questions, please contact me by e-mail at Mark_Evans@oxy.com or by phone at 361-776-6169.

Sincerely,



Mark R. Evans
Environmental Manager - Projects
Occidental Chemical Corporation

MRE/see: T1HH571W

Attachments

cc: Stephen Compton, Tetra Tech, Inc.
Jim Hughey, HRA Gray & Pape





Attachment A. Cultural Resources Area of Potential Effect for the OxyChem Ingleside Fractionator Facility and Ethane Cracker Facility, San Patricio County, Texas.

Prepared For:  **OxyChem**
Occidental Chemical Corporation

Prepared By:  **TETRA TECH**

Date: 01/14

LEGEND

 Ethane Cracker APE  Fractionator APE

0 0.25 0.5 0.75 1 Miles

Scale = 1:12,000

Sheet 1 of 1

United States
 Arizona, New Mexico, Oklahoma, Arkansas, Tennessee, Mississippi, Alabama

Mexico
 Baja California, Baja California Sur, Sonora, Coahuila

Project Location
 Gulf of Mexico

Source: Aerial Imagery and County Boundaries from ESRI online mapping services. Available at <http://services.arcgis.com/arcgis/services>

ATTACHMENT B



HRA Gray & Pape, LLC

Mr. William Martin
Texas Historical Commission
Archeology Division
108 West 16th Street
Austin, Texas 78701

July 20, 2012

Re: FINAL REPORT: *Cultural Resources Management Survey and Consultation for the Occidental Chemical Corporation Ingleside Fractionator Site in San Patricio County, Texas*

Lead Federal Agency: United States Environmental Protection Agency – Region 6

Dear Mr. Martin:

On behalf of Tetra Tech, Inc. (Tetra Tech) and their client, Occidental Chemical Corporation (OxyChem), HRA Gray & Pape, LLC. (HRA Gray & Pape) has prepared the enclosed final report for the Ingleside Fractionator Project (Project) in San Patricio County, Texas. HRA Gray & Pape was contracted to conduct agency consultation for the Project based on previous field surveys that HRA Gray & Pape performed for unrelated projects in 2004. The Consultation Area consists of 202 hectares (499 acres), of which approximately 140 hectares (347 acres) was surveyed by HRA Gray & Pape in 2004 for the cancelled Vista del Sol Liquefied Natural Gas Terminal (VdSLNG) and Vista del Sol Pipeline (VdSPL) projects.

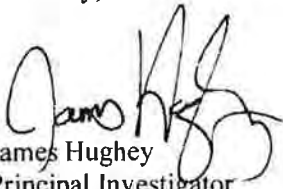
The results of fieldwork completed in 2004 for the VdSLNG and VdSPL projects were reported in separate draft and revised draft formats to the Texas Historical Commission (THC) and the United States Army Corps of Engineers, Galveston District (USACE). Based on the results of the surveys, HRA Gray & Pape recommended no further work within the project areas and that the projects be allowed to proceed. The projects were ultimately canceled before the reports were finalized and the THC did not offer further comment after submission of the revised drafts.

During a consultation meeting on February 7, 2012, with yourself and Jeff Durst regarding the current Project it was affirmed that the work conducted in 2004 was sufficient for the current Project. It was further stated that the November 2004 revised draft VdSLNG report could be updated to reflect the current Project and be submitted as a final report. Therefore, this final report discusses the results of survey efforts undertaken in 2004 in the context of the current Project. We request concurrence with a recommendation that no further cultural resources work is required for the project.

Cincinnati Ohio	Missoula Montana	Houston Texas	Richmond Virginia	Seattle Washington	Portland Oregon	Providence Rhode Island
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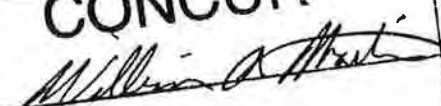
If you have any questions, or are in need of additional information, please do not hesitate to contact me at (713) 541-0473.

Sincerely,


James Hughey
Principal Investigator
HRA Gray & Pape, LLC

Enc.

CC: Steve Compton, Tetra Tech, Inc.
Bonnie Locking, Tetra Tech, Inc.
Mark Evans, OxyChem
Laura Whiting, OxyChem
Melanie Magee, United States Environmental Protection Agency-Region 6

CONCUR
by 
for Mark Wolfe
State Historic Preservation Officer
Date 9/5/12
Track# _____

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