



TULANE ENVIRONMENTAL LAW CLINIC

February 1, 2022

Via Certified U.S. Mail and Email

Michael Regan, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
Regan.michael@epa.gov

Via Certified U.S. Mail and Email

Lilian Dorka, Director
External Civil Rights Compliance Office
U.S. Environmental Protection Agency
Mail Code 2310A
1200 Pennsylvania Ave., NW
Washington, D.C. 20460
Title_VI_Complaints@epa.gov

RE: Complaint Under Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, and 40 C.F.R. Part 7 against the Louisiana Department of Environmental Quality for Lack of Environmental Justice Procedures in its Air Permitting Program and Resulting Discriminatory Decision on Formosa Air Permits

Dear Mr. Regan and Ms. Dorka:

Stop the Wallace Grain Terminal, Inclusive Louisiana, RISE St. James, and the Louisiana Bucket Brigade (collectively, “Complainants”), through undersigned counsel, bring this complaint against the Louisiana Department of Environmental Quality (LDEQ) under Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, and the EPA’s implementing regulations, 40 C.F.R. Part 7.

INTRODUCTION

1. LDEQ lacks any procedure or policy for addressing disproportionate impacts of its air permitting decisions on predominantly Black communities. This lack of policy has “the effect of subjecting Complainants and other individuals to discrimination because of their race, color, [or] national origin” and “the effect of defeating or substantially impairing accomplishment of the objectives of the program or activity with respect to individuals of a particular race,” i.e., Black people. *See* 40 C.F.R. § 7.35(b).

2. Specifically, LDEQ’s lack of a procedure for addressing disproportionate impacts of air pollution has the effect of discriminating against Black communities by resulting in the issuance of air permits authorizing new facilities and modifications of existing facilities that subject Black Louisianians to an overwhelming and outsized share of the negative impacts of industrial operations.

3. Due to LDEQ’s discrimination in the operation of its air permitting program, the Clean Air Act’s goal to “protect and enhance the quality of the Nation’s air resources so as to

Tulane Environmental Law Clinic

6329 Freret St., Ste. 130, New Orleans, LA 70118-6231 tel 504.865.5789 fax 504.862.8721 www.tulane.edu/~telc

promote the public health and welfare” is substantially impaired when applied to the health and welfare of Black Louisianians.

4. LDEQ’s lack of procedures for addressing air permitting in majority Black and overburdened communities likewise discriminates by having the effect of denying Black Louisianians, including Complainants, meaningful involvement in air permitting decisions. LDEQ’s public notice and comment procedures are inadequate, as LDEQ has no procedures for ensuring early notification and involvement of Black communities and, with respect to air permit proceedings that LDEQ classifies as minor, LDEQ has no procedures for ensuring notification and comment at all. These failures result in Black communities being shut out entirely of the air permitting process, or being included only at a point when they have no realistic opportunity to influence the decision of the applicant or LDEQ.

5. On August 5, 2021, LDEQ engaged in a discriminatory act by affirming its January 6, 2020, decision to issue 14 air permits to FG LA, LLC (“Formosa”). Exhibit A. This decision was enabled by, and resulted from, LDEQ’s lack of an established, protective procedure for addressing disproportionate impacts of its air permitting in majority Black communities.

6. The discriminatory effects of LDEQ’s failure to systemically address the disproportionate impact of its air permitting are evidenced in several additional examples, listed in the attached table. Exhibit B. These examples are LDEQ’s decisions to grant, renew, or modify air permits for the following industrial facilities: 1) Americas Styrenics LLC – St. James Parish (“AmSty”), 2) Greenfield Grain Terminal – St. John the Baptist Parish (“Greenfield”), 3) IMTT – Ascension Parish, 4) Cornerstone Chemical (“Cornerstone”) – Jefferson Parish, 5) Formosa (initial permitting decision) – St. James Parish, 6) Nucor Steel Louisiana, LLC (“Nucor”) – St. James Parish, 7) Mt. Airy Terminal (“Mt. Airy”) – St. John the Baptist Parish, and 8) Mosaic Fertilizer LLC – Faustina (“Mosaic”) – St. James Parish.

7. For years, community members, including Complainants’ members, have asked LDEQ to provide greater protection from the adverse and disproportionate effects that industrial air emissions have on their health and the environment. They have complained of industrial siting and expansion decisions being decided before they are even aware of the proposal, much less have a realistic opportunity to be heard. Despite this long history of complaints, LDEQ has continued to issue air permits with no regard, or arbitrary consideration, of disproportionate impacts on Black communities and without allowing for the early involvement essential to effective community engagement.

8. Complainants ask the Office of Civil Rights to enforce Title VI of the Civil Rights Act of 1964 and EPA’s implementing regulations. Complainants request that EPA investigate the complaint and, upon finding discrimination, require that LDEQ come into compliance with the law by developing robust and protective air permitting procedures that ensure that LDEQ does not discriminate against majority Black communities. The procedures should ensure both fair treatment and meaningful involvement. Complainants ask the Office of Civil Rights to respond with the full force of law by withdrawing LDEQ’s funding if needed to protect Black, indigenous, and people of color in Louisiana from being further disproportionately burdened.

PARTIES

9. Stop the Wallace Grain Terminal is a community organization comprised of residents of Wallace, Louisiana, as well as other St. John the Baptist Parish and Louisiana citizens who live, work, recreate and enjoy the Wallace area and want to protect the Wallace environment and their Black cultural heritage in Wallace.

10. Inclusive Louisiana is a non-profit corporation organized under the laws of the State of Louisiana. Inclusive Louisiana is based in Convent, Louisiana, and has Black members throughout St. James Parish. Inclusive Louisiana's mission is to spread enlightenment and hope to all people, to create a fairer and more inclusive society and to protect the heavens and earth for the generations to come. Inclusive Louisiana has an interest in protecting the air quality in St. James.

11. RISE St. James is a faith-based environmental and social justice organization fighting to protect the air, land, water, and the bodies of the people of St. James Parish from harmful petrochemical pollution. RISE St. James' members advocate for racial, social, and environmental justice. Many of RISE St. James' members reside in St. James Parish District 5, a majority Black community.

12. The Louisiana Bucket Brigade is an environmental health and justice organization with members who live in the shadow of Louisiana's oil refineries and chemical plants, including Black members in St. James Parish District 5 and statewide.

13. LDEQ is an agency of the State of Louisiana charged with implementing and enforcing the state's environmental laws. EPA delegated authority to LDEQ to issue air pollution permits under Clean Air Act § 502, 42 U.S.C. § 7661(a). Clean Air Act Final Full Approval of Operating Permits Program, Louisiana Department of Environmental Quality, 60 Fed. Reg. 47296 (September 12, 1995). LDEQ's duties include overseeing the permitting process and granting or rejecting permits.

JURISDICTION

LDEQ is Subject to Title VI

14. Title VI of the Civil Rights Act of 1964 prohibits recipients of federal funds from discriminating against individuals on the basis of race, color, or national origin. It provides: "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." 42 U.S.C. § 2000d. Acceptance of federal funds, including EPA assistance, creates an obligation on the recipient to comply with Title VI and the federal agency's implementing regulations. *See* 40 C.F.R. § 7.35.

15. EPA's Title VI regulations provide that "[n]o person shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or

activity receiving EPA assistance on the basis of race, color [or] national origin.” 40 C.F.R. § 7.30. A “program or activity” includes “all of the operations of ... a department, agency, special purpose district, or other instrumentality of a State or of a local government ... any part of which is extended Federal financial assistance.” 42 U.S.C. § 2000d-4a. “[I]f any part of a listed entity receives federal funds, the entire entity is covered by Title VI.” *Ass'n of Mexican-Am. Educators v. State of Cal.*, 195 F.3d 465, 474-75 (9th Cir. 1999), rev'd in part on other grounds, 231 F.3d 572 (9th Cir. 2000) (citing *Grimes v. Superior Home Health Care*, 929 F. Supp. 1088, 1092 (M.D. Tenn. 1996)).

16. LDEQ receives federal assistance from EPA and is a federal “program or activity” under Title VI, making it subject to the requirements of Title VI and EPA’s implementing regulations. EPA’s Title VI regulations define a “[r]ecipient” as “any State or its political subdivision, any instrumentality of a State or its political subdivision, any public or private agency, institution, organization, or other entity, or any person to which Federal financial assistance is extended directly or through another recipient” 40 C.F.R. § 7.25.

17. According to USAspending.gov, LDEQ receives federal funds from EPA: <https://www.usaspending.gov/recipient/64f969bb-d72a-a36d-c776-5e0f3f4617fa-C/latest>. This includes funding for LDEQ’s air program: https://www.usaspending.gov/award/ASST_NON_01F74801_6800. Because LDEQ receives financial assistance from EPA, it is subject to Title VI and EPA’s Title VI implementing regulations. 40 C.F.R. § 7.25 (defining “EPA assistance” to include “any grant or corporative agreement, loan, contract . . . or any other arrangement by which EPA provides or otherwise makes available assistance in the form of funds”).

TIMELINESS

18. Rather than being exclusively about a specific instance of discrimination, this complaint alleges that LDEQ’s lack of any procedure or policy for addressing disproportionate impacts of its air permitting decisions on predominantly Black communities is a continuing violation of Title VI. LDEQ discriminates against communities of color, specifically majority Black communities, by failing to, or arbitrarily, taking into account environmental justice when issuing air permits. Agency action “includes the whole or a part of an agency rule, order, license, sanction, relief, or the equivalent or denial thereof, or failure to act.” 5 U.S.C. § 551(13).

19. This complaint is timely because LDEQ’s discriminatory rules remain in effect each and every day, its discriminatory acts under those rules are ongoing, and because this complaint is filed within 180 days of the August 5, 2021, LDEQ discriminatory act of reaffirming its decision to issue the Formosa air permits.

20. This complaint is timely because additional examples of LDEQ air permitting decisions evidencing the discriminatory effects of its lack of an environmental justice policy or procedure occurred within 180 days. *See* Exhibit 2 Table. Additionally, EPA may waive these time limits. 40 C.F.R. § 7.120(b)(2). EPA also has ongoing authority to periodically review recipients’ programs and activities to ensure Title VI compliance. *Id.* § 7.115.

OTHER JURISDICTIONAL CONSIDERATIONS

21. This complaint satisfies all other jurisdictional criteria in Title VI and EPA's implementing regulations. Specifically, this complaint is in writing, describes the alleged discriminatory acts and the entity that performed them, and is filed with EPA by the Tulane Environmental Law Clinic on behalf of Stop the Wallace Grain Terminal, Inclusive Louisiana, RISE St. James, and the Louisiana Bucket Brigade as a result of LDEQ's Title VI violations. 40 C.F.R. § 7.120(a), (b).

FACTUAL BACKGROUND

A. Historical and Ongoing Environmental Racism in Louisiana is Perpetuated through LDEQ's Air Permitting Program.

22. In the South, the history of government-sponsored racial discrimination is long, and horrific. While racial discrimination in its most blatant forms have been condemned by modern society and outlawed, its history and effects linger on today. This through-line often manifests as a law or program which is administered in such a way that its burdens are experienced disproportionately by minorities, through political/administrative neglect or systemic inequalities. This is the story of environmental regulation in Louisiana, of which Formosa is only one of many examples. This problem is well-known to the Environmental Protection Agency,¹ which as part of the federal government holds a special responsibility to address racial discrimination by the States.

23. The failure of the LDEQ to establish an environmental justice policy and a consistent, non-discretionary procedure to address disproportionate impacts of its air permitting program has resulted in an ad hoc, arbitrary, and discriminatory approach to whether and how the agency considers and addresses the disproportionate burdens of environmental degradation experienced by Black individuals in Louisiana. In the case of Formosa, discussed more fully below, LDEQ's discriminatory act in affirming its original decision to grant the air permits was enabled by its ability to adopt inconsistent treatment of data of disproportionate health effects, favoring whichever data supported a decision to issue the permits and disregarding the data that militated against issuance. *See infra*, at ¶ 36. In numerous other cases, LDEQ has failed entirely to perform an environmental justice analysis at all. *See infra*, at ¶ 46; Ex. B. Across cases, LDEQ is inconsistent in how it analyzes environmental justice issues, utilizing whatever data and metrics support a decision to issue the permit, while ignoring the same type of data in other cases. *See infra*, at ¶ 46.

24. These inconsistencies (and flat-out omissions, in many cases) demonstrate the

¹ "In every community I visited during the Journey to Justice tour, the message was clear - residents have suffered far too long and local, state, and federal agencies have to do better." Michael Regan, EPA Administrator. EPA, "EPA Administrator Regan Announces Bold Actions to Protect Communities Following the Journey to Justice Tour" (January 26, 2022), available at <https://www.epa.gov/newsreleases/epa-administrator-regan-announces-bold-actions-protect-communities-following-journey>.

danger and discriminatory effect of LDEQ's failure to establish an environmental justice policy or non-discretionary procedure, allowing LDEQ to ignore environmental justice issues wherever and whenever it chooses. And when the agency elects to engage in that analysis, it does so in whatever manner it chooses. Because there is no set procedure or policy for how the agency is to perform an environmental justice analysis, LDEQ is operating on a completely ad hoc basis which, oftentimes, (as in the case of Formosa) is no more than an arbitrary exercise seeking to justify LDEQ's foregone conclusion to grant the permit(s).

B. Formosa Permit Decisions: A Timely Example of the Discriminatory Effects of LDEQ's Failure to Establish an Environmental Justice Policy or Procedure.

a. Factual background of the Formosa project and LDEQ's discriminatory decision to grant its air permits.

25. In November of 2017, Formosa applied to LDEQ for Clean Air Act PSD and Title V air permits to construct and operate a massive plastics plant. The Formosa complex would cover 2,400 acres and would be located one mile and one-half mile from the majority Black communities of Welcome and Union, respectively, and within five miles of several other majority African American communities, including those in St. James. The complex will be approximately one mile from an elementary school – the Fifth Ward Elementary School – and a new church planned to be built on Big Boy Street. EDMS Doc. ID 11998452, AI 198351 (hereinafter “Basis for Decision” or “BFD”), at 31.²

26. Under its permits, the Formosa complex would emit more than 6,000 tons per year of criteria pollutants,³ 800 tons per year of toxic air pollutants, and 13 million tons per year of greenhouse gas equivalents. BFD, at 4-5. Specifically, Formosa's emissions of criteria pollutants would include particulate matter (PM_{2.5}), nitrogen dioxide (NO₂), volatile organic compounds (VOCs), and carbon monoxide (CO). *Id.* Formosa would also emit toxic and carcinogenic air pollutants, including ethylene oxide, benzene, formaldehyde, and 1,3-butadiene. *Id.*

27. Formosa's complex would be such a significant source of pollution that it would reportedly nearly double the air pollutant emissions in St. James Parish, which already ranks ninth in the state and in the top 100 nationally for toxic air emissions.⁴ According to an analysis of LDEQ's data by Dr. Michael Petroni for ProPublica, if Formosa builds and operates the

² LDEQ's Basis for Decision is available through its online Electronic Document Management System, at <https://edms.deq.louisiana.gov/app/doc/view?doc=11998452>.

³ Criteria pollutants include particulate matter, photochemical oxidants (including ozone), carbon monoxide, sulfur oxides, nitrogen oxides, and lead. EPA, Criteria Air Pollutants, <https://www.epa.gov/criteria-air-pollutants#self> (last visited Oct. 26, 2020). 360 tons per year of the toxic pollutants are included as Volatile Organic Compounds, a component of criteria air pollutants.

⁴ David J. Mitchell, *For Massive New Plants, Formosa Wants OK to Double Amount of Chemicals Released into St. James Parish Air*, *The Advocate* (July 8, 2018, 6:37 PM), available at https://www.theadvocate.com/baton_rouge/news/article_c30d4620-a1be-11e9-837c-13f09466bb79.html.

complex, residents across the Mississippi River “will face double the toxic levels of cancer-causing chemicals than they currently do,” and that “[o]ne mile east of the St. James community, those levels could more than triple.”⁵ ProPublica also reported that its “analysis estimates that the air around Formosa’s site is more toxic with cancer-causing chemicals than 99.6% of industrialized areas in the country,” and that “[i]f the complex emits all the chemicals it proposes in its permit application, it would rank in the top 1% nationwide of major plants in America in terms of the concentrations of cancer-causing chemicals in its vicinity.”⁶

28. If built, Formosa may become Louisiana’s largest source of ethylene oxide emissions. The proposed facility is permitted to emit 7.7 tons per year of ethylene oxide, which is more than emitted by any Louisiana facility in recent history.⁷ Based on the results of the 2014 National Air Toxics Assessment (NATA), EPA has found that ethylene oxide “significantly contributes to potential elevated risks in some census tracts across the United States for some types of cancers, including cancers of the white blood cells (such as non-Hodgkin’s lymphoma, myeloma, and lymphocytic leukemia) and breast cancer in females.”⁸ EPA analysis for the Integrated Risk Information System (IRIS) also found that ethylene oxide is more carcinogenic than previously understood and linked long-term exposure to increased cancer risk.⁹ Formosa would emit 15,400 pounds of ethylene oxide per year, which is modelled to result in an exceedance of EPA’s recommended safe level of .02 μm^3 , both on and off the site. BFD, at 14.

29. The proposed plant will be located in a predominantly Black community with historical roots. Within a five-mile radius of the proposed plant, the population is 75 percent People of Color.¹⁰ Census tract 405, where the proposed site is located, is 89 percent Black, and 92 percent People of Color.¹¹ Welcome, the nearest town, is 94 percent Black and 96 percent People of Color.¹²

30. More than 200 petrochemical plants line the Mississippi River from Baton Rouge

⁵ ProPublica, together with The Advocate and the Times Picayune, documented the toxic impact of Formosa’s planned complex in “Polluter’s Paradise.” ProPublica’s expert added Formosa’s expected emissions to impacts from existing emission sources in the area, using the same modeled toxic pollutant concentrations that LDEQ relied on and data from EPA’s Risk-Screening Environmental Indicators (RSEI) model. Lylla Younes, *What Could Happen if a \$9.4 Billion Chemical Plant Comes to ‘Cancer Alley’* ProPublica (Nov. 18, 2019), available at <https://www.propublica.org/article/what-could-happen-if-a-9.4-billion-chemical-plant-comes-to-cancer-alley>.

⁶ *Id.*

⁷ According to self-reported annual emissions inventories since 2016. Data source: EPA. EasyRSEI 2016-2019 data. Accessed Jan 31, 2022. Available at <https://edap.epa.gov/public/extensions/EasyRSEI/EasyRSEI.html>.

⁸ <https://www.epa.gov/hazardous-air-pollutants-ethylene-oxide/fact-sheet-epa-taking-steps-address-emissions-ethylene-oxide>.

⁹ Evaluation of the Inhalation Carcinogenicity of Ethylene Oxide, EPA (Dec. 2016), https://cfpub.epa.gov/ncea/iris/iris_documents/documents/toxreviews/1025tr.pdf.

¹⁰ EDMS Doc. ID 11457119, AI 198351, at 23 (Supplemental Environmental Assessment Statement), available at <https://edms.deq.louisiana.gov/app/doc/view?doc=11457119>.

¹¹ U.S. Census Bureau. 2020 Decennial Census. Accessed Jan 31, 2022 from data.census.gov.

¹² *Id.*

to New Orleans – a cancer alley for the residents of the industrial corridor. Nearly every census tract between Baton Rouge and New Orleans has a NATA Cancer Risk in the 95th – 100th percentile.¹³ This means that, on average, these communities have a higher estimated cancer risk from air toxics than at least 95% of U.S. residents.¹⁴ Recently, residents changed their name for the industrial corridor from Cancer Alley to “Death Alley” because cancer and disease have decimated their families and communities.¹⁵

31. At the public hearing on Formosa’s air permits, Ex. (6), 7(C) of RISE St. James, Ex. (6), 7(C) called attention to the increased health risks:

More chemicals means more cancer, more damaged nervous system[s], more unexplained illnesses, more birth defects, more asthma and sick children and more death. So, I come here today because I have no choice but to try to stop this, and as I look at all of you, I have to wonder what would you all do. What would you do if this plant[] was going to be built a mile from your []house or your child’s school as it is being built a mile from St. Louis Academy.¹⁶

32. Many residents pleaded with LDEQ officials to consider the health and wellbeing of the community. Another resident Ex. (6), 7(C) gave an impassioned call to LDEQ to stop flooding the community with pollution:

We need no more pollution. We are already devastated. Our bodies can no longer take any more, breathing the toxic and chemicals everyday. . . Only the people that is in the community will be breathing in the toxins. So, no. I do not want F[or]mosa. I never did, and as long as there is breath in my body, the answer will be no. I will stand until I can’t stand, and when I can’t stand, I will kneel, and when I can’t kneel anymore, I will crawl.¹⁷

33. Several residents also shared how their family members had succumbed to cancer. Ex. (6), 7(C)¹⁸

¹³ National Air Toxics Assessment, 2014 NATA: Assessment Results, EPA (last updated Aug. 27, 2018), <https://www.epa.gov/national-air-toxics-assessment/2014-nata-assessment-results#nationwide>).

¹⁴ National Air Toxics Assessment, 2014 NATA: Assessment Results, EPA (accessed via EJSCREEN on Feb. 1, 2022).

¹⁵ “We used to call it Cancer Alley. But the death meted out by the more than 200 petrochemical plants mostly located in African-American towns and neighborhoods caused us to change the name. Illness and death come in so many guises, slow and fast – autoimmune diseases, rare breathing and skin afflictions, neurological abnormalities, an array of cancers.” Orissa Arend, “Love Comes to Death Alley,” The New Orleans Tribune (June 2019), available at <https://theneworleantribune.com/love-comes-to-death-alley/>.

¹⁶ Transcript of Public Hearing Held July 9, 2019, at 21. EMDS Doc. ID 11766810, AI 198351, available at <https://edms.deq.louisiana.gov/app/doc/view?doc=11766810>.

¹⁷ *Id.* at 26.

¹⁸ *Id.* at 33.

Ex. (6), 7(C)
Ex. (6), 7(C)

34. Indeed, the pattern of development of industrial projects in St. James Parish supports these residents' observations. A map submitted to LDEQ by RISE St. James and the Louisiana Bucket Brigade shows the location of industrial areas in the various districts. Exhibit C. The map shows that the 3rd District, at the eastern edge of the parish and away from Formosa's proposed site, is free of industrial development. That area, according to the 2020 Decennial Census, is predominantly White.

35. In addition to the public hearing testimony of St. James area residents opposed to the Formosa permits, LDEQ also received thousands of written comments in opposition to the permits, including many focused on environmental justice and the disproportionate impact of Formosa's emissions on people of color and the surrounding communities. Despite strong community opposition, on January 6, 2020, LDEQ granted Formosa the 14 permits to construct and operate its massive polluting chemical complex near Welcome, Louisiana. BFD, at 43.

36. In LDEQ's decision to grant the Formosa permits, its purported analysis of environmental justice concerns was discriminatory and reflected an LDEQ choice to include, favor, and rely exclusively on parameters that were unrelated to disproportionate burden or which tended to show a lack of health impacts, and to ignore or reject data that demonstrated disproportionate burden and health impacts. For example:

- LDEQ did not include racial and income demographics of the affected communities in its environmental justice analysis.
- LDEQ did not consider Formosa's emissions in its analysis of disproportionate burden.
- LDEQ's alternative site analysis failed to consider the relative pollution burden experienced by the communities of the site candidates.²⁰
- LDEQ conducted two emission trends analyses that purported to demonstrate that permitted and actual emissions in the area had gone down. But it arbitrarily omitted data from each that meant neither portrayed an accurate picture of the relevant data. While LDEQ's consideration of permitted emissions focused on the five-mile area surrounding the proposed Formosa site, an appropriately focused geographical area, it omitted toxic emissions — a critical part of the analysis. And when it considered

¹⁹ *Id.* at 26-27.

²⁰ It is clear, in fact, that the final decision to site the project in Welcome was made long before LDEQ's review of the project even began. Formosa purchased the property in 2017, and the Governor of Louisiana announced that the project would be sited in St. James in 2018 – years before Formosa applied for its permits. Office of the Governor, *Formosa Selects St. James Parish for \$9.4 Billion Louisiana Project*, Louisiana.gov (Apr. 23, 2018), <https://gov.louisiana.gov/news/sunshine-project>.

actual emissions of criteria and toxic pollutants — both essential parameters — it broadened the geographic view to parish-wide and so did not capture the impacts on the communities actually neighboring the proposed Formosa plant. BFD, at 40-41.

- LDEQ relied heavily on *outdated* EJSCREEN data showing that the air toxics cancer risk for Welcome was 48-per-million, less than the state average of 49-per-million (putting Welcome in the 57th percentile for the state), to conclude that “residents of the community closest to the FG LA Complex do *not* bear a disproportionate share of the negative environmental consequences resulting from industrial operations.” BFD, at 39-40. The version of EJSCREEN relied on by LDEQ was the 2018 version, based on emissions only through 2011, nearly a decade out of date at the time of the decision.²¹

37. The updated 2019 EJSCREEN report shows that Welcome is in the *86th* percentile for cancer risk in the state. Exhibit D. This figure is based on data from the 2014 National Air Toxics Assessment.²² The 2019 EJSCREEN report became available November 2019, before LDEQ issued its original decision to grant the Formosa air permits. LDEQ did not use this updated information in its original decision.

- b. LDEQ’s remand decision continued to discriminate against the communities already bearing disproportionate burdens of industrial pollution.

38. Following LDEQ’s January 6, 2020, approval of Formosa’s air permits, several environmental and grass roots groups,²³ represented by Earthjustice, filed a Petition for Judicial Review of LDEQ’s decision with Louisiana’s 19th Judicial District Court on February 14, 2020. On February 24, 2020, Ex. (6), 7(C),²⁴ represented by the Ex. (6), 7(C)

39. During the court proceedings, as a result of a motion filed by Ex. (6), 7(C), Ex. (6), 7(C), the court remanded the permit decision to LDEQ to take the updated 2019 EJSCREEN information into evidence. Importantly, the court gave LDEQ authority to modify its decision by reason of the additional information. *See* Ex. A at 1.

40. On August 5, 2021, LDEQ issued a supplemental decision reaffirming its decision to grant the Formosa permits. Ex. A. LDEQ dismissed the additional risk demonstrated by the updated EJSCREEN data, which showed that Welcome was in the 86th percentile for cancer risk in the state, despite relying on EJSCREEN and NATA in its original decision.

41. In its August 5, 2021, decision, LDEQ found that the more recent data did not

²¹ EJSCREEN Technical Documentation (August 2017).

²² EPA, EJSCREEN Technical Documentation (2019), at 35, available at

https://www.epa.gov/sites/default/files/2021-04/documents/ejscreen_technical_document.pdf.

²³ RISE St. James, Louisiana Bucket Brigade, Sierra Club, Center for Biological Diversity, Healthy Gulf, Earthworks, and No Waste Louisiana.

²⁴ This matter is still open, with an argument on the merits scheduled for March 14, 2022.

account for even more recent reductions in emissions in the area. Ex. A, at 2-3. LDEQ characterized EJSCREEN as an unreliable screening tool, overemphasizing the limitations of the tool as outlined by EPA. For example, EPA guidance indicates that “Screening results should be supplemented with additional information and local knowledge to get a better understanding of the issues in a selected location.” (see [here](#)). Instead of supplementing the screening results, LDEQ disregarded the EJSCREEN results for the proposed Formosa Plastics site.

42. LDEQ did not gather additional information and local knowledge about race and pollution burden. For example, EJSCREEN indicates that while the population living in a 3-mile radius around Formosa’s proposed site is 78% People of Color, additional information reveals that the community of Welcome, located just 2.5 miles from the proposed site, is 95% Black (see U.S. Census Bureau. 2020 Decennial Census. Accessed Jan 31, 2022 from data.census.gov).

43. Benefitting once again from its failure to establish a set policy or procedure for how it analyzes environmental justice issues, on remand, and in the face of EJSCREEN information that directly contradicted its prior EJSCREEN-based conclusion of no disproportionate impact, LDEQ arbitrarily changed the scope and nature of its environmental justice analysis. In its remand decision, LDEQ disregarded the now unfavorable EJSCREEN information and instead used different information, and did so largely without explanation. For example:

- Despite focusing its original emissions analyses on major sources within 5 miles of the Formosa Complex or parish-wide, LDEQ drastically changed its procedure, and in its remand decision considered up to 100 miles away from St. James Parish in order to portray the desired emissions reductions.²⁵
- Despite focusing heavily on relative risk (i.e. how the community’s cancer risk compared to the state average) in its original decision, when LDEQ was presented with information showing that Welcome is in the 86th percentile in the state for cancer risk, the agency changed its analysis and improperly equated the additional cancer risk to predicted actual cancer occurrences, claiming that the higher cancer risk data presented by the 2014 NATA would not result in a “statistically significant” elevation in real-world occurrences of cancer.²⁶
- Despite relying on EJSCREEN in its original decision, in its remand decision LDEQ claimed that EJSCREEN “grossly overestimates” public exposure to pollution, claiming that EJSCREEN assumes continuous exposure over 70 years even though the NATA Technical Documentation clearly shows that the model utilizes “real-

²⁵ Ex. A, at 4, n.14.

²⁶ *Id.* at 2-3. Not only is this an arbitrary and unexplained change in how the agency evaluates cancer risk, it betrays LDEQ’s fundamental misunderstanding regarding the nature of cancer risk.

world exposure,” which includes time spent in residences, vehicles, garages, schools, bars/restaurants, offices, public spaces, airports, hospitals, and other environments.²⁷

- LDEQ was arbitrary even within its remand decision, utilizing different areas of analysis to cherry-pick emission reductions, using a 100-mile radius for chloroprene and actual ethylene oxide emissions, a 27-mile radius for permitted ethylene oxide emissions, and the borders of St. James Parish for benzene emissions.²⁸

LEGAL BACKGROUND

A. Title VI of the Civil Rights Act of 1964

44. Title VI of the Civil Rights Act of 1964 prohibits recipients of federal funds from discriminating against individuals on the basis of race, color, or national origin. 42 U.S.C. § 2000d. Title VI directs federal agencies granting federal assistance to issue regulations to achieve the statutory objectives. *Id.* § 2000d-1.

45. EPA’s implementing regulations state that “[n]o person shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving EPA assistance on the basis of race, color, [or] national origin[.]” 40 C.F.R. § 7.30. The regulations also provide a non-exclusive list of specific, prohibited discriminatory acts: (b) “A recipient shall not use criteria or methods of administering its program or activity which have the effect of subjecting individuals to discrimination because of their race, color, national origin, or sex, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program or activity with respect to individuals of a particular race, color, national origin, or sex.” *Id.* § 7.35. These regulations make clear that discrimination on the basis of race or color is a violation of Title VI whether it is the purpose of the decision or the effect. *Id.*

B. Environmental Justice Requirement of Meaningful Involvement

46. EPA has noted that “[m]eaningful public involvement consists of informing, consulting, and working with potentially affected and affected communities at various stages of the permitting process to address their concerns.”²⁹ Meaningful involvement means that: “(1) potentially affected community members have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health; (2) the public’s contribution can influence the regulatory agency’s decision; (3) the concerns of all participants involved will be considered in the decision-making process; and (4) the decision

²⁷ NATA Technical Support Document (August 2018), at 118, 131, available at https://www.epa.gov/sites/default/files/2018-09/documents/2014_nata_technical_support_document.pdf.

²⁸ Exhibit A, at 2-4.

²⁹ 71 Fed. Reg. 14207, 14210 (EPA, *Title VI Public Involvement Guidance for EPA Assistance Recipients Administering Environmental Permitting Programs (Recipient Guidance)* (March 21, 2006)).

makers seek out and facilitate the involvement of those potentially affected.”³⁰

C. Violations of Title VI

47. LDEQ continuously violates Title VI by placing industry in predominantly Black, overburdened communities while failing to have a concrete environmental justice policy as part of its air permitting program. Additionally, the issuance of the Formosa remand decision reaffirming LDEQ’s decision to issue the Formosa air permits was itself a discriminatory act and a demonstrable effect of LDEQ’s continuing violation.

48. LDEQ’s lack of a consistent and established environmental justice protocol has resulted in numerous discriminatory acts of air permitting. Complainants have summarized some of these instances in the table attached as Exhibit B, and highlight a few examples below:

- In March of 2016, LDEQ issued Mosaic Fertilizer, LLC, a Part 70 Air Operating Permit Renewal and Modification, Permit No. 2560-00021-V6, which included a large increase in permitted carbon dioxide emissions (over 100 tons per year) and increases in emissions of PM_{2.5}, nitrogen oxide, volatile organic compounds, and toxic air pollutants. LDEQ failed to address environmental justice issues when making this significant modification.
- In June of 2019, LDEQ issued Nucor Steel Louisiana, LLC, a Prevention of Significant Deterioration Permit Modification, Permit No. PSD-LA-751(M3) and Part 70 Air Operating Permit Renewal and Modification, Permit No. 3086-V6, which included significant increases for plant-wide emissions of PM₁₀, PM_{2.5}, nitrogen oxide, and carbon dioxide, as well as increases for emissions of toxic air pollutants. Public comments were submitted. LDEQ did not address environmental justice in its response to comments and does not appear to have issued any Basis for Decision in connection with its decision.³¹
- In October of 2021, LDEQ issued American Styrenics, LLC, a Part 70 Air Operating Permit Renewal and Modification that included increases in toxic air pollutants - most notably adding 8 tons per year of styrene emissions. Permit No. 2560-00007-V17. No LDEQ response to comments or Basis for Decision addressing disproportionate impact is evidenced on LDEQ’s electronic database, EDMS. AmSty is in the majority Black 5th district of St. James.

³⁰ EPA, *Plan EJ 2014* (September 2011), available at <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100DFCQ.PDF?Dockey=P100DFCQ.PDF>

³¹ This is particularly inconsistent because LDEQ *did* perform an environmental justice analysis when Nucor applied for its original Title V permit in 2011 (although insufficiently, without accounting for demographics or utilizing EJSCREEN indicators). LDEQ, Basis for Decision, Permit No. 3086-V0 and Permit No. PSD-LA-751 (January 27, 2011), available at <https://edms.deq.louisiana.gov/app/doc/view?doc=7806731>.

49. These omissions demonstrate the danger and discriminatory effect of LDEQ's failure to establish an environmental justice policy or non-discretionary procedure, allowing LDEQ to ignore environmental justice issues wherever and whenever it chooses. And even when LDEQ decides to engage in an environmental justice analysis (as a matter of discretion), because there is no set procedure or policy for how the agency is to do so, that analysis is ad hoc and oftentimes (as in the case of Formosa) is no more than an arbitrary exercise seeking to justify LDEQ's foregone conclusion to grant the permit(s).

50. Unlike Title VI of the Civil Rights Act, the state court litigation applying Administrative Procedure Act principles to LDEQ's decisions issuing and reaffirming the Formosa air permits cannot remedy the continuous, ongoing, and pervasive discriminatory, adverse effects resulting from LDEQ's failure to establish a non-discriminatory environmental justice policy and procedure. EPA should not wait for the outcome of the state court litigation to remedy the decades-long discrimination suffered by Complainants and Black Louisianians across the state as a result of LDEQ's air permitting program. LDEQ's air permitting program has "the effect of defeating or substantially impairing accomplishment of the objectives of the [Clean Air Act] with respect to individuals of a particular race." 40 C.F.R. § 7.35. Therefore, Complainants are entitled to the immediate and full protections enshrined in the Civil Rights Act.

ADVERSE DISPROPORTIONATE IMPACTS

51. LDEQ's lack of a procedure or policy for addressing disproportionate impact of its air permitting program impacts all Black Louisianians, but communities in Cancer Alley are among the most impacted by this discrimination. Nearly every census tract between Baton Rouge and New Orleans has a NATA Cancer Risk in the 95th – 100th percentile. This means that, on average, these communities have a higher estimated cancer risk from air toxics than at least 95% of U.S. residents.³² More than 200 petrochemical plants line the Mississippi River from Baton Rouge to New Orleans. A 2012 analysis of NATA data by researchers from the University of Memphis' School of Public Health found that Black communities in Cancer Alley had a significantly higher cancer risk from toxic air pollution than white communities in Cancer Alley, and that benzene and formaldehyde (which would be emitted in large quantities from the proposed Formosa facility) were the main drivers of this disparity (James et al., 2012).³³ A recent study provides evidence that these disparities in health *risk* translate to disparities in health *outcomes*. The study found that higher NATA Cancer Risk was associated with higher cancer incidence among disproportionately Black or impoverished neighborhoods (i.e. census tracts) in Louisiana.³⁴

52. A more recent study found that, across Louisiana, census tracts with higher

³² National Air Toxics Assessment, 2014 NATA: Assessment Results, EPA (accessed via EJSCREEN on Feb. 1, 2022).

³³ Uneven Magnitude of Disparities in Cancer Risks from Air Toxics, *Int. J. Environ. Res. Public Health* 2012, 9, 4365-4385; doi:10.3390/ijerph9124365.

³⁴ Terrell, K. and G. St. Julien, 2022. *Environ. Res. Lett.* 17 014033, available at <https://iopscience.iop.org/article/10.1088/1748-9326/ac4360>.

proportions of Black residents had higher long-term exposure to fine particulate matter (PM_{2.5}) and higher cumulative exposures to toxic air pollutants that are known to harm the respiratory system and suppress immune function (Terrell and James, 2020).³⁵ In addition to the direct damage that PM_{2.5} and air toxics cause to the lungs and other organs, these pollutants can increase susceptibility to infectious disease. For example, there is strong evidence that the risk of death from COVID-19 is higher for people who have long-term exposure to PM_{2.5} (Wu, 2020) or air toxics (Petroni, 2020). This evidence is consistent with the observation that Louisiana parishes with higher COVID-19 death rates had higher proportions of Black residents and higher pollution burdens.

53. These adverse impacts from industry are overwhelming occurring in overburdened, predominantly Black communities. By using EJSCREEN, the disproportionate impact of where industry is placed becomes concerningly apparent. While LDEQ's handling of environmental justice is arbitrary, the pattern of where it permits industrialization is anything but. 2020 Census Data of the districts of St. James Parish shows that District 3 has the lowest rate of industrialization while having the highest percentage of white people (at 84.1%) and the lowest percentage of Black people (at 13.3%). In contrast, District 5 has one of the highest rates of industrialization while having only 10.8% of the population as white and 85.8% of the population as Black.

54. A prime example of this phenomenon can be seen by looking at LDEQ's air permit granted to Formosa. Under its permits, the Formosa complex would emit more than 6,000 tons per year of criteria pollutants³⁶, 800 tons per year of toxic air pollutants, and 13 million tons per year of greenhouse gas equivalents. Specifically, Formosa's emissions of criteria pollutants would include particulate matter (PM_{2.5}), nitrogen dioxide (NO₂), volatile organic compounds (VOCs), and carbon monoxide (CO). Formosa would also discharge toxic and carcinogenic air pollutants, including ethylene oxide, benzene, formaldehyde, and 1,3-butadiene. Formosa is permitted to emit (pollutant tons per year): PM 2.5 - 340, sulfur dioxide- 83, nitrogen oxides- 1,243, carbon monoxide- 2,769, VOCs -1,668, Acetaldehyde-18, Benzene-37, 1,3-Butadiene-24, Ethylene Oxide- 8, and Formaldehyde- 9. This translates into a significantly higher risk for lung or respiratory problems, headaches, dizziness or brain damage, heart disease, nausea, damage to developing fetus, blood disorders, immune disorders, and more terminal issues. The town of the proposed site, Welcome, is 94% Black and already a predominant hub of industrialization in the 86th percentile for cancer risk in the state.

55. Publicized facts make apparent that the decision to site the Formosa facility was made long before the public was given an opportunity in 2019 to comment to LDEQ on the air permits. St. James was listed as the location of the facility on a 2015 application. Formosa purchased the property at the Mosaic-Gavilon site in 2017. Governor Edwards announced that

³⁵ Racial Disparities in Air Pollution Burden and COVID-19 Deaths in Louisiana, USA, in the Context of Long-Term Changes in Fine Particulate Pollution, ENVIRONMENTAL JUSTICE Volume 00, Number 00, 2020, DOI: 10.1089/env.2020.0021.

³⁶ 360 tons per year of the toxic pollutants are included as Volatile Organic Compounds, a component of criteria air pollutants.

Formosa would build in St. James in 2018. The inadequate alternative sites analysis conducted by Formosa and signed off on by LDEQ served only to mask this fait accompli. The discriminatory effect of LDEQ's failure to systemically address the disproportionate impact of its air permitting is evidenced continuously and consistently.

56. LDEQ's permitting decisions confirm this pattern of disproportionate impact, revealing inconsistent consideration of environmental justice (EJ). The summary of some of LDEQ's recent permitting decisions attached as Exhibit B all show impacts to predominantly Black communities – most already suffering from the adverse impacts of industry with significant increased cancer risk – from LDEQ's lack of a protective, established environmental justice procedure. Ex B; *see also* Exhibit E (EJSCREEN information in globo for populations surrounding facilities listed in Ex. B).

57. EJSCREEN indicates that the population within 2 miles of Nucor, one of the facilities listed in Exhibit B, is 64% People of Color. The closest neighborhood to Nucor (~1 mile away) is Romeville (census blocks 2052 and 2054, St. James Parish), a tiny community that is 87% People of Color (primarily Black; see U.S. Census Bureau. 2020 Decennial Census. Accessed Feb 1, 2022 from data.census.gov).

58. In neighboring St. John the Baptist Parish, the 3-mile radius around the proposed Greenfield Grain Terminal listed in Exhibit B is 52% People of Color according to EJSCREEN. The neighborhoods closest to the proposed site are 93% People of Color (predominantly Black).³⁷

CONCLUSION

LDEQ's pattern of permitting industrialization in overburdened black, indigenous, or people of color communities based on its lack of meaningful environmental justice analysis has subjugated residents of those communities to the environmental and health hazards of industry. The impact of LDEQ's lack of an environmental justice procedure for addressing disproportionate impacts of air pollution in Black communities leads to "subjecting individuals to discrimination because of their race, color, [or] national origin" and "the effect of defeating or substantially impairing accomplishment of the objectives of the program or activity with respect to individuals of a particular race," i.e., Black people. *See* 40 C.F.R. § 7.35(b). Accordingly, EPA should: 1) investigate this complaint, 2) require prompt reformation of the air permitting program and mitigation of harmful effects within the community, and/or 3) cut off federal funding to Louisiana's environmental programs. Deference for proper relief and remedies should be given to the impacted communities.

Complainants additionally request that EPA involve them not only in the initial investigation, but in the proceedings involved in developing any Informal Resolution Agreement.

³⁷ Census blocks 1027, 1028, 1029, 1030, 1031, 1032, and 1033, representing the neighborhoods immediately surrounding the proposed Greenfield grain terminal, from the Veteran's bridge to Whitney Plantation Road, including the Whitney Plantation. See U.S. Census Bureau. 2020 Decennial Census. Accessed Jan 31, 2022 from data.census.gov.

Substantially Prepared by:

Ex. (6), 7(C)

Respectfully submitted by:

Ex. (6), 7(C)

Tulane Environmental Law Clinic
6329 Freret Street
New Orleans, LA 70118
Phone: 504-865^{Ex. (6), 7(C)}
Email: ^{Ex. (6), 7(C)} @tulane.edu
Counsel for Complainants

cc: via email

Matthew Tejada
Director, Office of Environmental Justice
U.S. Environmental Protection Agency
Tejada.matthew@epa.gov

Dr. Earthea Nance
Regional Administrator, Region 6
U.S. Environmental Protection Agency
Nance.Earthea@epa.gov

Olivia Balandran
Acting Director, Office of Communities, Tribes,
and Environmental Assessment, Region 6
U.S. Environmental Protection Agency
Balandran.Olivia-r@epa.gov

Cecil Rodrigues
Acting Deputy Regional Administrator, Region 6
U.S. Environmental Protection Agency
Roderigues.cecil@epa.gov

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL SERVICES**

SUPPLEMENT TO THE BASIS FOR DECISION

**PART 70 OPERATING PERMIT NOS. 3141-V0, 3142-V0, 3143-V0, 3144-V0, 3145-V0,
3146-V0, 3147-V0, 3148-V0, 3149-V0, 3150-V0, 3151-V0, 3152-V0, 3153-V0, AND 3154-V0**

PREVENTION OF SIGNIFICANT DETERIORATION (PSD) PERMIT PSD-LA-812

FG LA COMPLEX

FG LA LLC

WELCOME, ST. JAMES PARISH, LOUISIANA

Agency Interest (AI) No. 198351

I. BACKGROUND:

On January 6, 2020, the Louisiana Department of Environmental Quality (LDEQ), Office of Environmental Services (OES) issued to FG LA LLC (FG LA) Part 70 (Title V) operating and Prevention of Significant Deterioration (PSD) permits for the FG LA Complex. These permits allow for the construction and operation of the facility at 8846 Highway 3127 in St. James, St. James Parish, Louisiana, near the unincorporated community of Welcome.

On February 14, 2020, the petition for judicial review, *RISE St. James, et al. v. Louisiana Department of Environmental Quality*, Docket No. 694,029, was filed at the 19th Judicial District Court challenging the issuance of these permits. On February 24, 2020, Beverly Alexander, Petitioner-Intervenor, intervened in the petition for judicial review and subsequently filed a preliminary motion for judicial notice of adjudicative facts and to admit procedural irregularities, which was later amended by Petitioner-Intervenor. On May 12, 2021, at a hearing on the amended motion, the 19th Judicial District Court remanded the permitting decisions back to LDEQ pursuant to La. R.S. 30:2050.21(E).¹ The court ordered LDEQ to supplement the administrative record with Exhibit A² within 90 days of May 12, 2021, or by August 10, 2021. The court further ordered that pursuant to La. R.S. 30:2050.21(E), the Department may modify its reasons and decisions due to the information found in Exhibit A, and that the Department shall supplement the administrative record with such additional information, as well as any modifications, new findings, or decisions, within 90 days of May 12, 2021, or by August 10, 2021.

II. ENVIRONMENTAL JUSTICE/CIVIL RIGHTS TITLE VI ISSUES

In addressing environmental justice (EJ) concerns associated with the FG LA Complex, the Basis for Decision referenced EJSCREEN data that indicated the environmental indicators of Particulate Matter, Ozone, NATA Air Toxics Cancer Risk, and NATA Respiratory Hazard Index for the community of Welcome are comparable with or less than state averages.³

¹ The May 12, 2021, judgment rendered in open court was reduced to a written judgment signed by the court on June 8, 2021.

² Exhibit A is a 2019 EJSCREEN Report for the community of Welcome, Louisiana, and is attached to the Petitioner-Intervenor's *Motion for Judicial Notice of Adjudicative Facts and to Admit Proof of Procedural Irregularities*, filed October 6, 2020 in the 19th Judicial District Court, Case No. 694,029.

³ EDMS Doc ID 11998452 (pp. 39-40 and 106-107 of 182) (internal citations omitted). This document also

Indicator	Value	State Average
Particulate Matter ($PM_{2.5}$ in $\mu\text{g}/\text{m}^3$)	9.22	9.03
Ozone (ppb)	37	37.4
NATA Cancer Risk (risk per million)	48	49
NATA Respiratory Hazard Index	1.8	1.9

However, subsequent to the preparation of the Basis for Decision and Public Comments Response Summary, but prior to the issuance of the permits, the U.S. Environmental Protection Agency (EPA) updated EJSCREEN utilizing the latest demographic and environmental data from the U.S Census, EPA, and other sources. The current values for the environmental indicators considered by LDEQ are shown in the table below.

Indicator	Value ⁴	State Average	Change from 2011 NATA
Particulate Matter ($PM_{2.5}$ in $\mu\text{g}/\text{m}^3$)	8.66	8.62	-0.56
Ozone (ppb)	35.5	36.8	-1.5
NATA Cancer Risk (risk per million)	65	51	+17
NATA Respiratory Hazard Index	0.6	0.61	-1.2

Notably, the environmental indicators of Particulate Matter, Ozone, and NATA Respiratory Hazard Index *decreased* and remain virtually equivalent to or less than state averages.

However, based on the results of the 2014 National Air Toxics Assessment (NATA),⁵ the NATA Cancer Risk for the area did increase. While this risk value did increase relative to the state average, this change does not represent a statistically significant increase in the overall cancer risk to those living in the vicinity of the FG LA Complex. For example, based on a population of 891 persons, the NATA Cancer Risk value of 48-in-1 million used in the Basis for Decision equates to 0.04 cases of cancer. The current NATA Cancer Risk value of 65-in-1 million equates to 0.06 cases of cancer. In fact, assuming all areas had the same NATA Cancer Risk value of 65-in-1 million, it would take a population essentially equivalent to that of St. James and St. John the Baptist Parishes combined for the increase to result in one additional case of cancer.⁶

echoed EPA's caveats that EJSCREEN data should *not* be used to quantify specific risk values for a selected area, to measure cumulative impacts of multiple environmental factors, or as a basis for agency decision-making or making a determination regarding the existence or absence of EJ concerns. See <https://www.epa.gov/ejscreen/how-does-epa-use-ejscreen>.

⁴ Data per the 2019 EJSCREEN Report, Exhibit A.

⁵ <https://www.epa.gov/ejscreen/overview-environmental-indicators-ejscreen>

⁶ United States Census Bureau population estimates for St. James (21,096) and St. John the Baptist (42,837) as of July 1, 2019

Moreover, the NATA Cancer Risk value of 65-in-1 million overestimates actual cancer risk for two primary reasons. One, EPA's assumed exposure scenario does not reflect "real world" conditions. According to EPA, a risk level of "n"-in-1 million implies that up to "n" people out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the specific concentration over 70 years (an assumed lifetime).⁷ That any person would be continuously exposed to the concentrations of pollutants modeled by EPA to estimate cancer risk for the area for 70 years is simply not realistic.

Two, reported emissions for chloroprene and ethylene oxide, the compounds EPA identifies as contributing "to most of the risk" in census tracts that may have elevated risks of cancer from air toxics exposure, have declined significantly since 2014.⁸

As shown in the table below, for Census Tract 22093040500,⁹ which includes Welcome and St. James, ethylene oxide is primarily responsible for the increase in estimated cancer risk between the 2011 NATA and the 2014 NATA, though chloroprene remains the second highest contributor from industrial point sources. These compounds, along with benzene, are the only pollutants from industrial point sources to which exposure results in an estimated cancer risk greater than or equal to 0.5 cases per million persons.

Point Source Cancer Risk (per million) for Census Tract 22093040500

Pollutant	2011 NATA ¹⁰	2014 NATA ¹¹
Chloroprene	7.119	2.806
Benzene	0.807	0.664
Ethylene Oxide	0.515	26.561

As indicated above, these risk estimates do not reflect the recent and substantial reductions in emissions of these compounds. According to data submitted to LDEQ's Emissions Reporting and Inventory Center (ERIC), emissions of chloroprene, ethylene oxide, and benzene have declined significantly since 2014 as reflected in the table below.¹²

⁷ Technical Support Document for EPA's 2014 National Air Toxics Assessment, August 2018 (p. A-1) (https://www.epa.gov/sites/production/files/2018-09/documents/2014_nata_technical_support_document.pdf)

⁸ 2014 National Air Toxics Assessment: Fact Sheet (pp. 1-2) (https://www.epa.gov/sites/production/files/2018-08/documents/2014_nata_overview_fact_sheet.pdf)
2014 NATA Summary of Results (p. 2)

(https://www.epa.gov/sites/production/files/2020-07/documents/nata_2014_summary_of_results.pdf)
EPA also places emissions from coke ovens, which use thermal energy to convert coal into coke, in this category. However, there are no coke ovens in Louisiana.

⁹ For a map of this census tract, see https://www2.census.gov/geo/maps/dc10map/tract/st22_la/c22093_st_james/DC10CT_C22093_001.pdf.

¹⁰ Data per the Access file "ConcExpRisk_tract_poll_State_LA_09Dec15.accdb" available at <https://www.epa.gov/national-air-toxics-assessment/2011-nata-assessment-results#state>.

¹¹ Data per the Access file "ConcExpRisk_tract_poll_LA.mdb" available at <https://www.epa.gov/national-air-toxics-assessment/2014-nata-assessment-results#state>.

¹² Because BCP Ingredients is a minor source of toxic air pollutants (TAPs), it was not required to report ethylene oxide emissions for calendar year 2020. Therefore, LDEQ utilized 2019 Toxics Release Inventory (TRI) data in lieu of 2020 ERIC data for this source.

Pollutant	Change (%) ¹⁴
Chloroprene	-85.8 ¹⁵
Ethylene Oxide	-44.2 ¹⁶
Benzene	-19.4

III. CONCLUSION

In sum, the 2014 NATA data does not materially change the results of the impact of the FG LA Complex on human health and environment. The NATA Cancer Risk value is based on a dated emissions inventory which fails to account for the recent and substantial reductions in emissions of the compounds which EPA asserts contribute “to most of the risk” and grossly overestimates public exposure to all carcinogenic pollutants.

For these reasons, LDEQ reaffirms that the social and economic benefits of the proposed project will greatly outweigh its adverse environmental impacts.



Elliott B. Vega
Assistant Secretary
Office of Environmental Services

August 5, 2021

Date

EBV:BDJ

¹⁴ There are *no* sources of chloroprene or ethylene oxide in St. James Parish. Emissions reflect all sources in Louisiana within 100 miles of St. James Parish. Emissions of benzene are from sources in St. James Parish.

¹⁵ Reductions have been made enforceable by Administrative Order on Consent AE-AOC-17-00011, dated January 6, 2017 (EDMS Doc ID 10457076).

¹⁶ Permitted emissions of ethylene oxide from the seven (7) primary sources in the area considered (AIs 1136, 1409, 2049, 2083, 3263, 13560, and 27495) have been reduced by 39.6% since the 2014 NATA was released on August 22, 2018.

Exhibit B. Recent (Post 2015) LDEQ Permit Decisions, Revealing Inconsistent Consideration of Environmental Justice (EJ)

Decision Date	Facility Name (AI Number)	Address (from EDMS)	People of Color ¹		NATA Cancer Risk ² (100 = worst) 3 mi	Parish	Permit Type	Permit #	Public Notice Required?	Comments Received?	EJ ANALYSIS				Notes
			2 mi	3 mi							Published?	Health Indicators?	Emissions Trends?	Demographic Data?	
Oct 19, 2021	America's Styrenics (2384)	9901 Hwy 18 St. James la	66%	65%	93	St. James	Major Modification	2560-00007-V17	Yes	Yes	No	NA	NA	NA	Adjacent to proposed Formosa site.
Aug 3, 2020	Greenfield (222696)	Hwy 18 at W 7 th St, Wallace	60%	52%	98	St. John	Initial Minor	2580-00068-00	No	No	No	NA	NA	NA	Strong public opposition, but no notice or comment period.
Apr 27, 2020	IMTT (122402)	8112 Hwy 75 Geismar	70%	56%	96	Ascension	Initial Major	0180-00102-V0	Yes	No	No	NA	NA	NA	Existing facility, emissions increase from minor to major source.
Mar 9, 2020	Cornerstone Chemical (1357)	10800 River Rd, Waggaman	55%	59%	90	Jefferson	Initial Major	3171-V0	Yes	Yes	Yes. See Basis for Decision.	No	No	Partial (1 mi radius only)	LDEQ claims this is not an EJ community.
Jan 6, 2020	Formosa (198351)	8846 Hwy 3127 St. James ²	59%	78%	91	St. James	Initial Major	PSD-LA-812	Yes	Yes	Yes	Yes (EJScreen & LTR)	Yes ⁴	No	LDEQ used absurd 100 mi radius for emissions trends.
Jun 13, 2019	Nucor (157847)	9101 Hwy 3125, Convent ²	64%	86%	88	St. James	Major Modification	3086-V6	Yes	Yes	No	NA	NA	NA	Increases in PM10, PM2.5, NOx, CO, and some TAPs.
Apr 17, 2018	Mt. Airy Terminal (144688)	4006 Hwy 44 Mount Airy, LA	57%	63%	98	St. John	Initial Major	2580-00051-V0	Yes	Yes	Yes. See Basis for Decision.	No. (But LTR data cited on page 6 of Response to Comments.)	No	No	Massive VOC emissions (1,500 tpy). Facility existed previously as minor source.
Mar 22, 2016	Mosaic Faustina (2425)	9959 Hwy 18 St. James	66%	65%	93	St. James	Major Modification	2560-00021-V6	Yes	No	No	NA	NA	NA	Large CO increase (95 tpy).

¹According to EJScreen Version 2020. Accessed Jan 30, 2022. Distances correspond to buffer radius around the facility (using physical address from LDEQ's EDMS database).

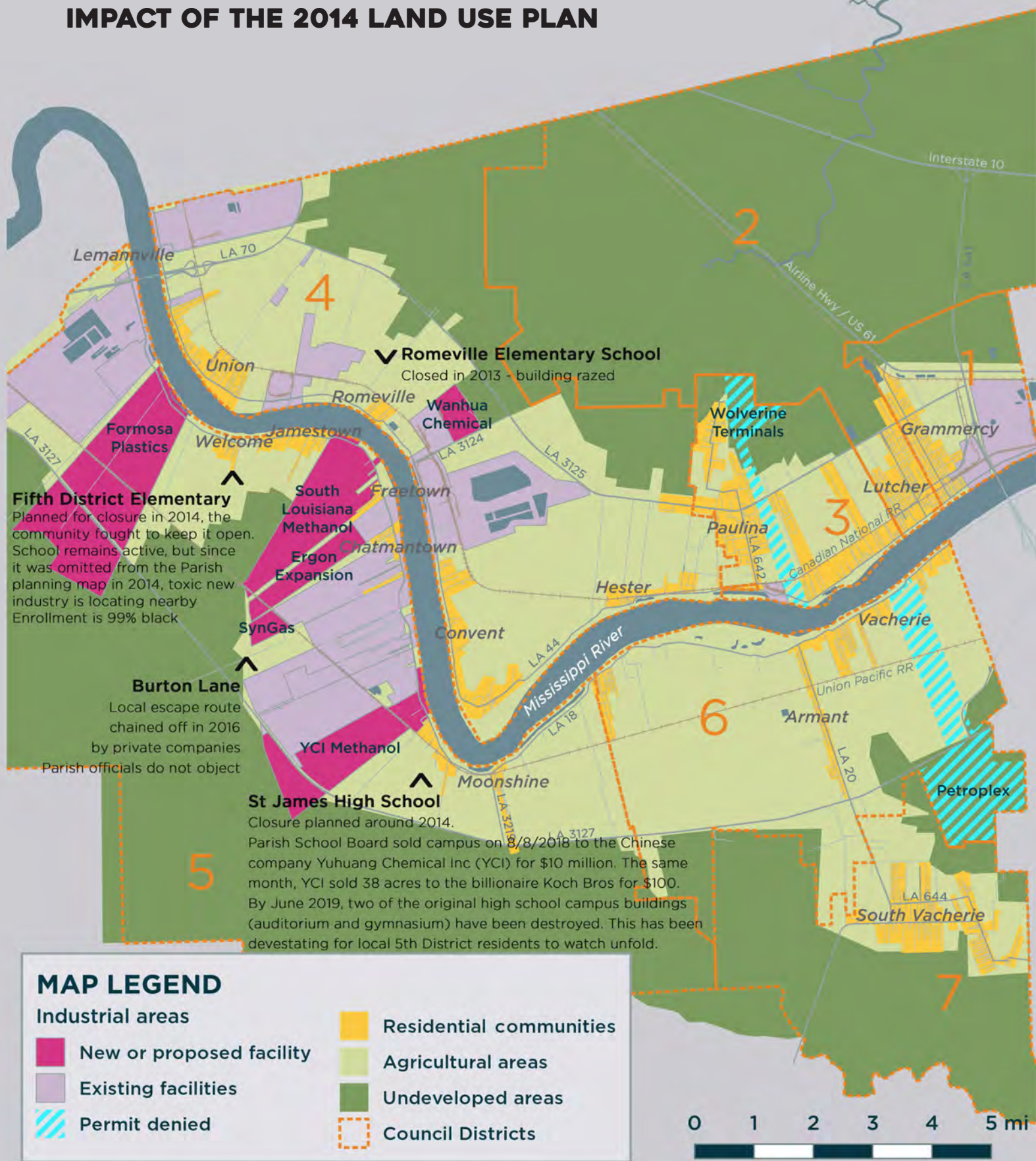
²State Cancer Risk percentile (%tile) from EJScreen Reports.

³LDEQ analyzed parish-wide, self-reported emissions of criteria pollutants and TAPs. LDEQ also analyzed facility-specific permitted emissions.

⁴LDEQ was wildly inconsistent in the trends analysis used to support this permit decision. LDEQ chose a large (5-mile) radius around Formosa's proposed site, and then only analyzed criteria pollutants (permitted). When LDEQ considered St. James Parish and Louisiana, it analyzed both criteria and toxic pollutants, this time using self-reported ("actual") emissions instead of permitted emissions. Then, in a Supplemental Basis for Decision, LDEQ analyzed ethylene oxide emissions for a 100-mile radius around Formosa's proposed site (permitted and self-reported), as well as benzene and chloroprene emissions in St. James Parish only (using self-reported data only).

A COMMUNITY UNDER SEIGE

IMPACT OF THE 2014 LAND USE PLAN



Fifth District Elementary
 Planned for closure in 2014, the community fought to keep it open. School remains active, but since it was omitted from the Parish planning map in 2014, toxic new industry is locating nearby. Enrollment is 99% black.

Burton Lane
 Local escape route chained off in 2016 by private companies. Parish officials do not object.

St James High School
 Closure planned around 2014. Parish School Board sold campus on 8/8/2018 to the Chinese company Yuhuang Chemical Inc (YCI) for \$10 million. The same month, YCI sold 38 acres to the billionaire Koch Bros for \$100. By June 2019, two of the original high school campus buildings (auditorium and gymnasium) have been destroyed. This has been devastating for local 5th District residents to watch unfold.

Data Sources: St James Clerk of Court, GIS, Assessor, Operations; US Department of Agriculture (aerial imagery)
 Map created by Justin Kray for RISE St James and Louisiana Bucket Brigade

Save as PDF



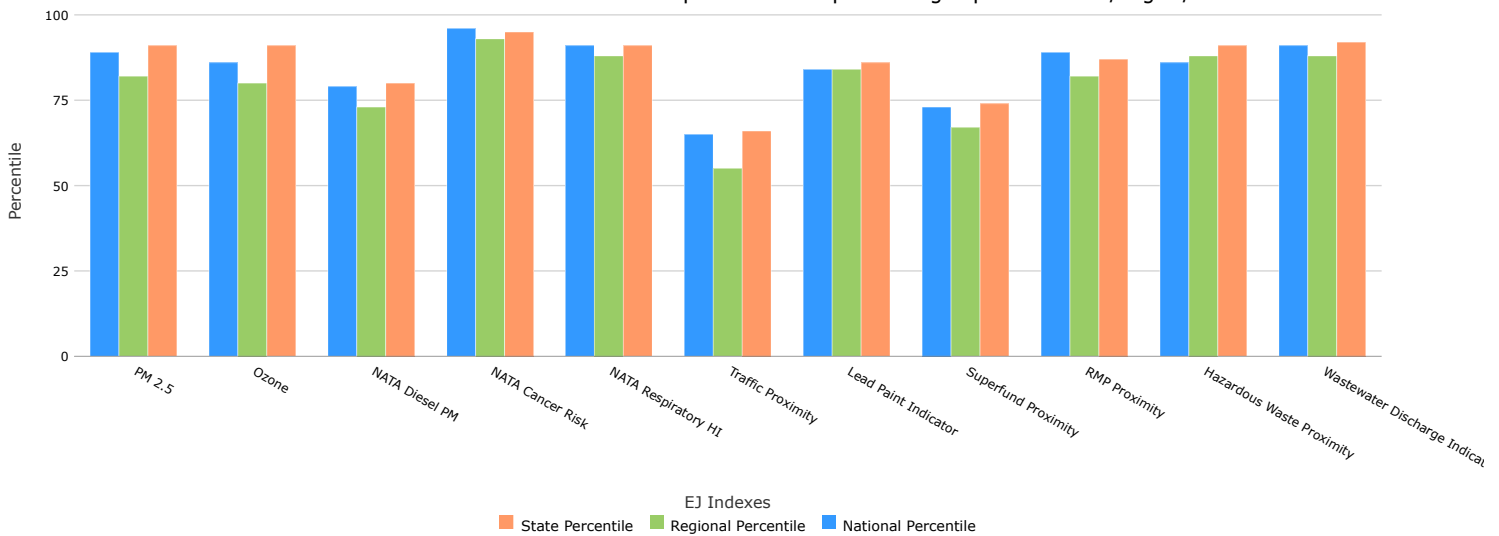
D

EJSCREEN Report (Version 2019)

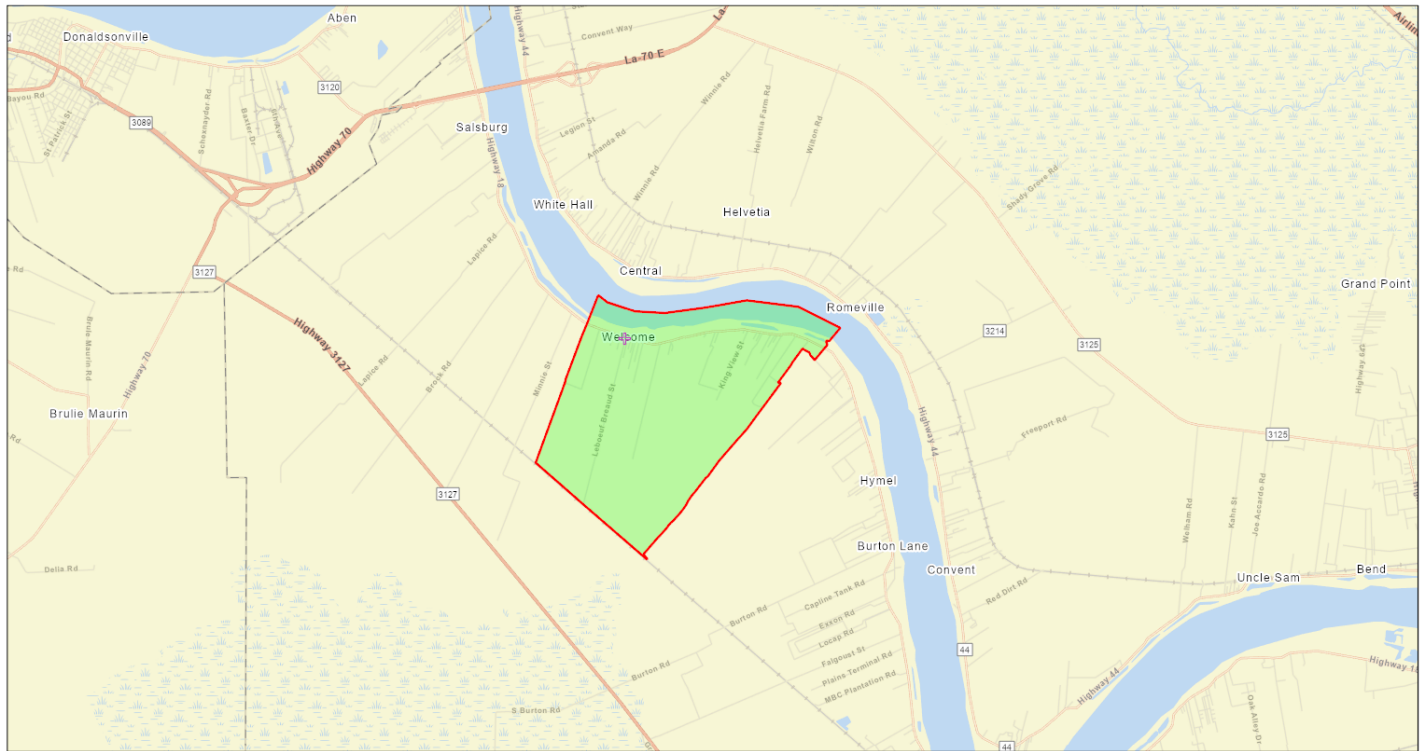
City: Welcome CDP
LOUISIANA, EPA Region 6
Approximate Population: 891
Input Area (sq. miles): 5.12

Selected Variables	Percentile in State	Percentile in EPA Region	Percentile in USA
EJ Indexes			
EJ Index for Particulate Matter (PM 2.5)	91	82	89
EJ Index for Ozone	91	80	86
EJ Index for NATA* Diesel PM	80	73	79
EJ Index for NATA* Air Toxics Cancer Risk	95	93	96
EJ Index for NATA* Respiratory Hazard Index	91	88	91
EJ Index for Traffic Proximity and Volume	66	55	65
EJ Index for Lead Paint Indicator	86	84	84
EJ Index for Superfund Proximity	74	67	73
EJ Index for RMP Proximity	87	82	89
EJ Index for Hazardous Waste Proximity	91	88	86
EJ Index for Wastewater Discharge Indicator	92	88	91

EJ Index for the Selected Area Compared to All People's Blockgroups in the State/Region/US

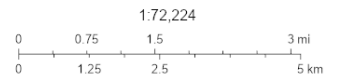


This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.



August 31, 2020

- Project 2
- + Project 1



Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

Selected Variables	Value	State		EPA Region		USA	
		Avg.	%tile	Avg.	%tile	Avg.	%tile
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.66	8.62	61	8.37	59	8.3	60
Ozone (ppb)	35.5	36.8	21	39.4	18	43	12
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.266	0.454	32	0.401	<50th	0.479	<50th
NATA* Air Toxics Cancer Risk (risk per MM)	65	51	86	36	95-100th	32	95-100th
NATA* Respiratory Hazard Index	0.6	0.61	64	0.45	90-95th	0.44	80-90th
Traffic Proximity and Volume (daily traffic count/distance to road)	22	330	24	400	17	750	16
Lead Paint Indicator (% pre-1960s housing)	0.16	0.21	57	0.17	66	0.28	47
Superfund Proximity (site count/km distance)	0.019	0.086	20	0.081	26	0.13	17
RMP Proximity (facility count/km distance)	0.89	0.9	67	0.82	70	0.74	73
Hazardous Waste Proximity (facility count/km distance)	1.2	0.75	77	0.75	79	4	67
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0087	27	77	9.8	78	14	78
Demographic Indicators							
Demographic Index	75%	40%	88	44%	87	36%	92
Minority Population	99%	41%	96	51%	95	39%	97
Low Income Population	52%	40%	72	37%	73	33%	80
Linguistically Isolated Population	0%	2%	63	6%	36	4%	45
Population with Less Than High School Education	20%	16%	70	16%	68	13%	78
Population under Age 5	5%	7%	41	7%	35	6%	44
Population over Age 64	11%	14%	39	13%	49	15%	39

*The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice (<http://www.epa.gov/environmentaljustice>)

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.



EJSCREEN Report (Version 2020)

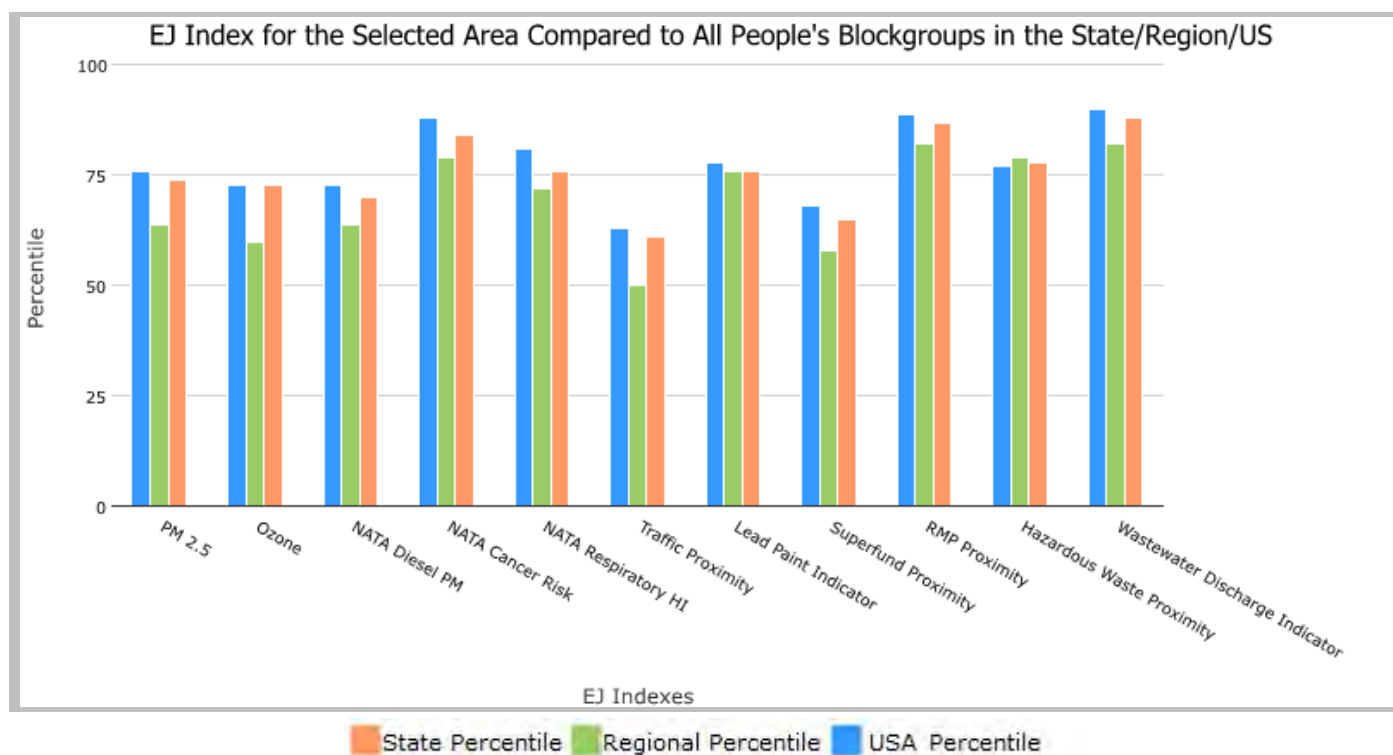
2 miles Ring Centered at 30.079757,-90.913914, LOUISIANA, EPA Region 6

Approximate Population: 1,471

Input Area (sq. miles): 12.56

AmSty (9901 Hwy 18, St. James)

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	74	64	76
EJ Index for Ozone	73	60	73
EJ Index for NATA* Diesel PM	70	64	73
EJ Index for NATA* Air Toxics Cancer Risk	84	79	88
EJ Index for NATA* Respiratory Hazard Index	76	72	81
EJ Index for Traffic Proximity and Volume	61	50	63
EJ Index for Lead Paint Indicator	76	76	78
EJ Index for Superfund Proximity	65	58	68
EJ Index for RMP Proximity	87	82	89
EJ Index for Hazardous Waste Proximity	78	79	77
EJ Index for Wastewater Discharge Indicator	88	82	90



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

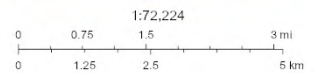
2 miles Ring Centered at 30.079757,-90.913914, LOUISIANA, EPA Region 6

Approximate Population: 1,471
 Input Area (sq. miles): 12.56
 AmSty (9901 Hwy 18, St. James)



January 31, 2022

AmSty (9901 Hwy 18, St. James)



Earthstar Geographics

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	2

EJSCREEN Report (Version 2020)



2 miles Ring Centered at 30.079757,-90.913914, LOUISIANA, EPA Region 6

Approximate Population: 1,471

Input Area (sq. miles): 12.56

AmSty (9901 Hwy 18, St. James)

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	9.03	8.91	70	8.95	38	8.55	65
Ozone (ppb)	34.6	36.2	12	41.8	7	42.9	9
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.358	0.455	47	0.401	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	74	51	92	36	95-100th	32	95-100th
NATA* Respiratory Hazard Index	0.66	0.61	78	0.45	95-100th	0.44	90-95th
Traffic Proximity and Volume (daily traffic count/distance to road)	19	330	22	400	16	750	15
Lead Paint Indicator (% Pre-1960 Housing)	0.24	0.21	71	0.17	76	0.28	57
Superfund Proximity (site count/km distance)	0.021	0.086	24	0.081	29	0.13	19
RMP Proximity (facility count/km distance)	2	0.9	85	0.82	88	0.74	90
Hazardous Waste Proximity (facility count/km distance)	1.6	1.5	64	0.99	79	5	60
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0092	1.7	78	9.5	78	9.4	79
Demographic Indicators							
Demographic Index	57%	40%	75	44%	69	36%	80
People of Color Population	66%	41%	75	52%	64	39%	76
Low Income Population	44%	39%	62	37%	65	33%	73
Linguistically Isolated Population	0%	2%	62	6%	36	4%	45
Population With Less Than High School Education	24%	15%	81	16%	76	13%	85
Population Under 5 years of age	6%	7%	49	7%	43	6%	52
Population over 64 years of age	12%	15%	39	13%	51	15%	40

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

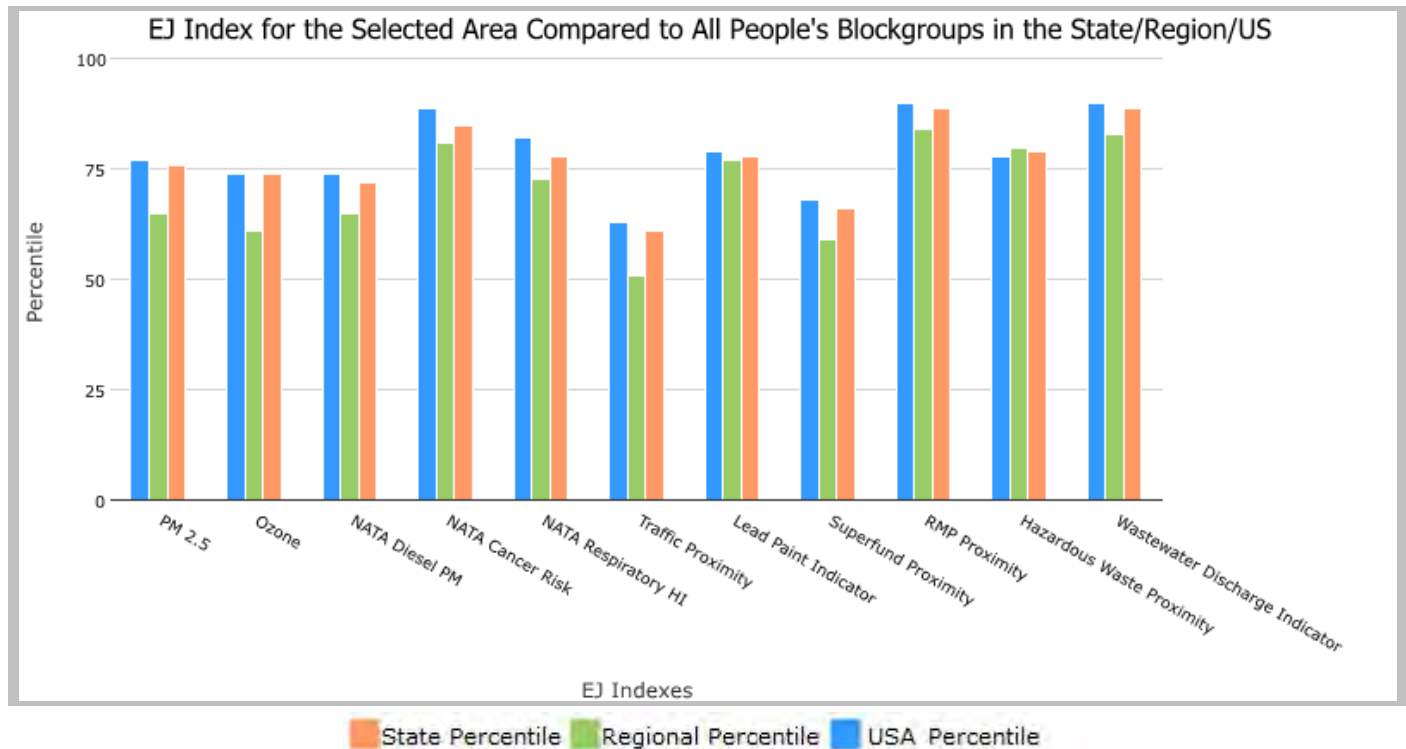
3 miles Ring Centered at 30.079757,-90.913914, LOUISIANA, EPA Region 6

Approximate Population: 1,919

Input Area (sq. miles): 28.27

AmSty (9901 Hwy 18, St. James)

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	76	65	77
EJ Index for Ozone	74	61	74
EJ Index for NATA* Diesel PM	72	65	74
EJ Index for NATA* Air Toxics Cancer Risk	85	81	89
EJ Index for NATA* Respiratory Hazard Index	78	73	82
EJ Index for Traffic Proximity and Volume	61	51	63
EJ Index for Lead Paint Indicator	78	77	79
EJ Index for Superfund Proximity	66	59	68
EJ Index for RMP Proximity	89	84	90
EJ Index for Hazardous Waste Proximity	79	80	78
EJ Index for Wastewater Discharge Indicator	89	83	90



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

3 miles Ring Centered at 30.079757,-90.913914, LOUISIANA, EPA Region 6

Approximate Population: 1,919

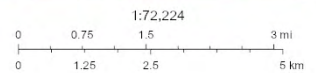
Input Area (sq. miles): 28.27

AmSty (9901 Hwy 18, St. James)



January 31, 2022

AmSty (9901 Hwy 18, St. James)



Earthstar Geographics

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	4

EJSCREEN Report (Version 2020)



3 miles Ring Centered at 30.079757,-90.913914, LOUISIANA, EPA Region 6

Approximate Population: 1,919

Input Area (sq. miles): 28.27

AmSty (9901 Hwy 18, St. James)

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	9.05	8.91	71	8.95	39	8.55	66
Ozone (ppb)	34.6	36.2	13	41.8	7	42.9	9
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.363	0.455	47	0.401	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	75	51	93	36	95-100th	32	95-100th
NATA* Respiratory Hazard Index	0.66	0.61	79	0.45	95-100th	0.44	90-95th
Traffic Proximity and Volume (daily traffic count/distance to road)	20	330	23	400	17	750	15
Lead Paint Indicator (% Pre-1960 Housing)	0.24	0.21	71	0.17	76	0.28	57
Superfund Proximity (site count/km distance)	0.021	0.086	24	0.081	29	0.13	19
RMP Proximity (facility count/km distance)	2.1	0.9	86	0.82	89	0.74	91
Hazardous Waste Proximity (facility count/km distance)	1.6	1.5	64	0.99	80	5	60
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0091	1.7	78	9.5	77	9.4	79
Demographic Indicators							
Demographic Index	58%	40%	76	44%	70	36%	81
People of Color Population	65%	41%	75	52%	64	39%	76
Low Income Population	48%	39%	66	37%	69	33%	77
Linguistically Isolated Population	0%	2%	62	6%	36	4%	45
Population With Less Than High School Education	25%	15%	82	16%	77	13%	85
Population Under 5 years of age	6%	7%	53	7%	48	6%	57
Population over 64 years of age	12%	15%	38	13%	50	15%	39

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

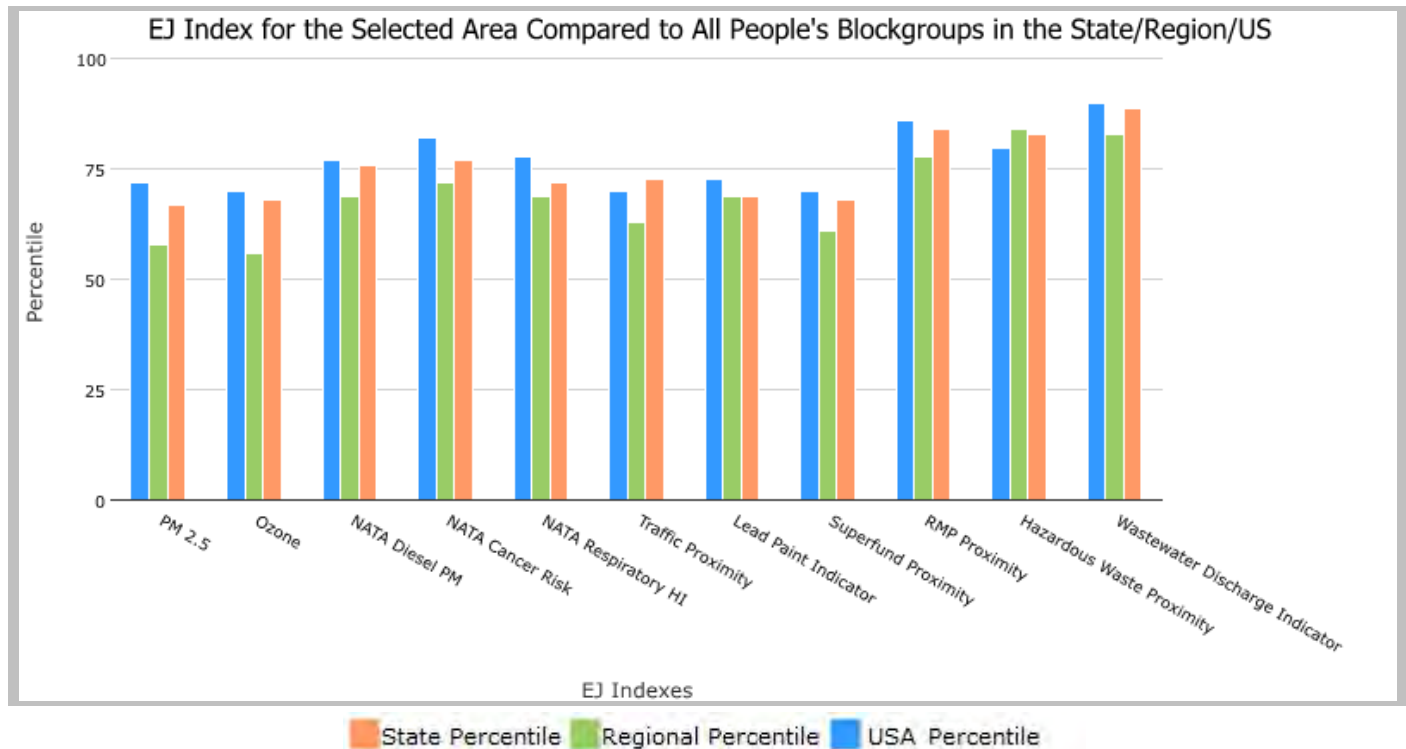
2 miles Ring Centered at 29.960450,-90.303119, LOUISIANA, EPA Region 6

Approximate Population: 8,637

Input Area (sq. miles): 12.56

Cornerstone

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	67	58	72
EJ Index for Ozone	68	56	70
EJ Index for NATA* Diesel PM	76	69	77
EJ Index for NATA* Air Toxics Cancer Risk	77	72	82
EJ Index for NATA* Respiratory Hazard Index	72	69	78
EJ Index for Traffic Proximity and Volume	73	63	70
EJ Index for Lead Paint Indicator	69	69	73
EJ Index for Superfund Proximity	68	61	70
EJ Index for RMP Proximity	84	78	86
EJ Index for Hazardous Waste Proximity	83	84	80
EJ Index for Wastewater Discharge Indicator	89	83	90



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

2 miles Ring Centered at 29.960450,-90.303119, LOUISIANA, EPA Region 6

Approximate Population: 8,637

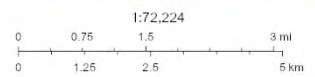
Input Area (sq. miles): 12.56

Cornerstone



January 31, 2022

- ✚ Cornerstone
- ✚ Search Result (point)



Earthstar Geographics

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	5

EJSCREEN Report (Version 2020)



2 miles Ring Centered at 29.960450,-90.303119, LOUISIANA, EPA Region 6

Approximate Population: 8,637

Input Area (sq. miles): 12.56

Cornerstone

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.83	8.91	50	8.95	29	8.55	59
Ozone (ppb)	36.7	36.2	77	41.8	20	42.9	15
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.699	0.455	83	0.401	90-95th	0.478	80-90th
NATA* Cancer Risk (lifetime risk per million)	70	51	90	36	95-100th	32	95-100th
NATA* Respiratory Hazard Index	0.67	0.61	80	0.45	95-100th	0.44	90-95th
Traffic Proximity and Volume (daily traffic count/distance to road)	130	330	52	400	46	750	39
Lead Paint Indicator (% Pre-1960 Housing)	0.088	0.21	39	0.17	55	0.28	36
Superfund Proximity (site count/km distance)	0.039	0.086	41	0.081	48	0.13	34
RMP Proximity (facility count/km distance)	1.9	0.9	84	0.82	88	0.74	90
Hazardous Waste Proximity (facility count/km distance)	3.2	1.5	85	0.99	93	5	76
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.011	1.7	81	9.5	79	9.4	80
Demographic Indicators							
Demographic Index	44%	40%	61	44%	54	36%	68
People of Color Population	55%	41%	68	52%	55	39%	69
Low Income Population	33%	39%	42	37%	47	33%	57
Linguistically Isolated Population	4%	2%	83	6%	59	4%	68
Population With Less Than High School Education	10%	15%	38	16%	43	13%	55
Population Under 5 years of age	8%	7%	66	7%	62	6%	71
Population over 64 years of age	11%	15%	37	13%	48	15%	37

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

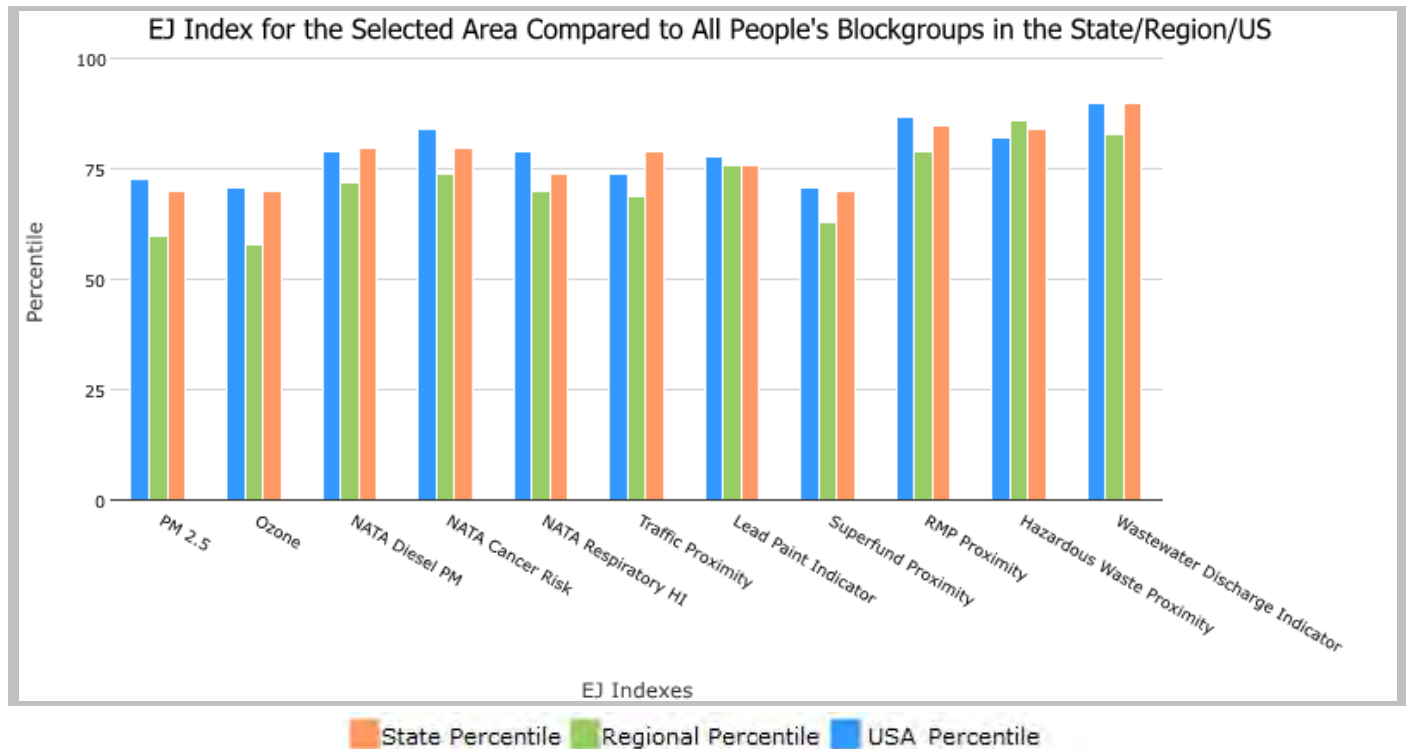
3 miles Ring Centered at 29.960450,-90.303119, LOUISIANA, EPA Region 6

Approximate Population: 10,658

Input Area (sq. miles): 28.27

Cornerstone (The study area contains 1 blockgroup(s) with zero population.)

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	70	60	73
EJ Index for Ozone	70	58	71
EJ Index for NATA* Diesel PM	80	72	79
EJ Index for NATA* Air Toxics Cancer Risk	80	74	84
EJ Index for NATA* Respiratory Hazard Index	74	70	79
EJ Index for Traffic Proximity and Volume	79	69	74
EJ Index for Lead Paint Indicator	76	76	78
EJ Index for Superfund Proximity	70	63	71
EJ Index for RMP Proximity	85	79	87
EJ Index for Hazardous Waste Proximity	84	86	82
EJ Index for Wastewater Discharge Indicator	90	83	90



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

3 miles Ring Centered at 29.960450,-90.303119, LOUISIANA, EPA Region 6

Approximate Population: 10,658

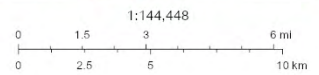
Input Area (sq. miles): 28.27

Cornerstone (The study area contains 1 blockgroup(s) with zero population.)



January 31, 2022

- ✚ Cornerstone
- ✚ Search Result (point)



Earthstar Geographics

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	8

EJSCREEN Report (Version 2020)



3 miles Ring Centered at 29.960450,-90.303119, LOUISIANA, EPA Region 6

Approximate Population: 10,658

Input Area (sq. miles): 28.27

Cornerstone (The study area contains 1 blockgroup(s) with zero population.)

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.83	8.91	51	8.95	29	8.55	59
Ozone (ppb)	36.7	36.2	77	41.8	20	42.9	15
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.725	0.455	85	0.401	90-95th	0.478	80-90th
NATA* Cancer Risk (lifetime risk per million)	69	51	90	36	95-100th	32	95-100th
NATA* Respiratory Hazard Index	0.67	0.61	79	0.45	95-100th	0.44	90-95th
Traffic Proximity and Volume (daily traffic count/distance to road)	220	330	64	400	60	750	50
Lead Paint Indicator (% Pre-1960 Housing)	0.16	0.21	57	0.17	67	0.28	47
Superfund Proximity (site count/km distance)	0.04	0.086	42	0.081	49	0.13	35
RMP Proximity (facility count/km distance)	1.9	0.9	84	0.82	88	0.74	89
Hazardous Waste Proximity (facility count/km distance)	3.3	1.5	86	0.99	93	5	77
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.012	1.7	81	9.5	80	9.4	80
Demographic Indicators							
Demographic Index	47%	40%	65	44%	58	36%	71
People of Color Population	59%	41%	72	52%	59	39%	72
Low Income Population	36%	39%	47	37%	52	33%	61
Linguistically Isolated Population	4%	2%	81	6%	57	4%	66
Population With Less Than High School Education	13%	15%	46	16%	50	13%	62
Population Under 5 years of age	7%	7%	60	7%	55	6%	65
Population over 64 years of age	12%	15%	40	13%	52	15%	41

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

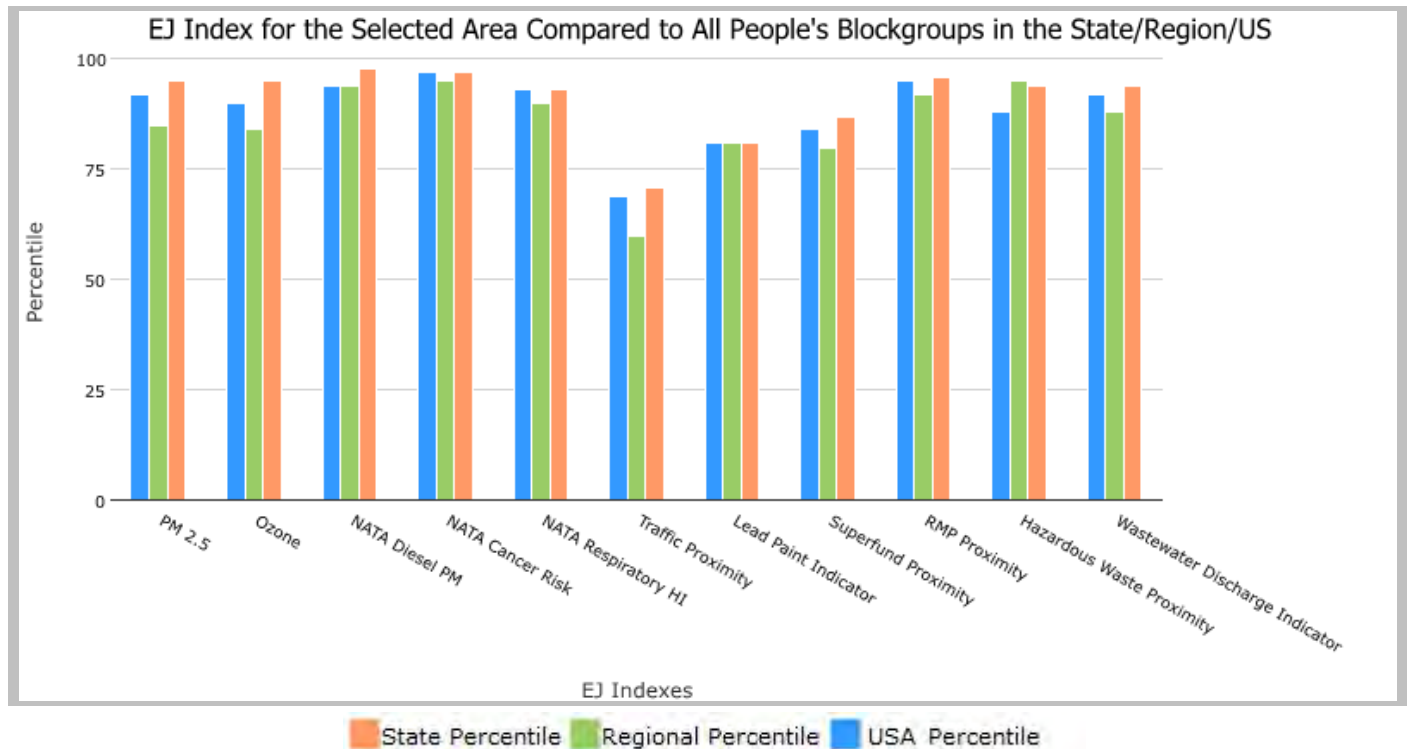
Blockgroup: 220510275011, LOUISIANA, EPA Region 6

Approximate Population: 4,096

Input Area (sq. miles): 4.47

Cornerstone Chemical

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	95	85	92
EJ Index for Ozone	95	84	90
EJ Index for NATA* Diesel PM	98	94	94
EJ Index for NATA* Air Toxics Cancer Risk	97	95	97
EJ Index for NATA* Respiratory Hazard Index	93	90	93
EJ Index for Traffic Proximity and Volume	71	60	69
EJ Index for Lead Paint Indicator	81	81	81
EJ Index for Superfund Proximity	87	80	84
EJ Index for RMP Proximity	96	92	95
EJ Index for Hazardous Waste Proximity	94	95	88
EJ Index for Wastewater Discharge Indicator	94	88	92



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

EJSCREEN Report (Version 2020)



Blockgroup: 220510275011, LOUISIANA, EPA Region 6

Approximate Population: 4,096

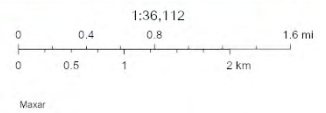
Input Area (sq. miles): 4.47

Cornerstone Chemical



January 31, 2022

- Cornerstone Chemical
- + Search Result (point)



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	4

EJSCREEN Report (Version 2020)

Blockgroup: 220510275011, LOUISIANA, EPA Region 6

Approximate Population: 4,096

Input Area (sq. miles): 4.47

Cornerstone Chemical

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.81	8.91	48	8.95	29	8.55	58
Ozone (ppb)	36.7	36.2	76	41.8	20	42.9	15
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.789	0.455	88	0.401	90-95th	0.478	80-90th
NATA* Cancer Risk (lifetime risk per million)	61	51	82	36	95-100th	32	95-100th
NATA* Respiratory Hazard Index	0.55	0.61	26	0.45	80-90th	0.44	70-80th
Traffic Proximity and Volume (daily traffic count/distance to road)	36	330	29	400	23	750	21
Lead Paint Indicator (% Pre-1960 Housing)	0.091	0.21	40	0.17	56	0.28	37
Superfund Proximity (site count/km distance)	0.05	0.086	49	0.081	57	0.13	42
RMP Proximity (facility count/km distance)	1.8	0.9	84	0.82	87	0.74	89
Hazardous Waste Proximity (facility count/km distance)	2.4	1.5	75	0.99	87	5	69
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0094	1.7	79	9.5	78	9.4	79
Demographic Indicators							
Demographic Index	55%	40%	72	44%	66	36%	78
People of Color Population	74%	41%	80	52%	70	39%	80
Low Income Population	35%	39%	46	37%	51	33%	60
Linguistically Isolated Population	4%	2%	81	6%	57	4%	66
Population With Less Than High School Education	9%	15%	34	16%	39	13%	51
Population Under 5 years of age	5%	7%	41	7%	36	6%	44
Population over 64 years of age	8%	15%	18	13%	29	15%	20

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

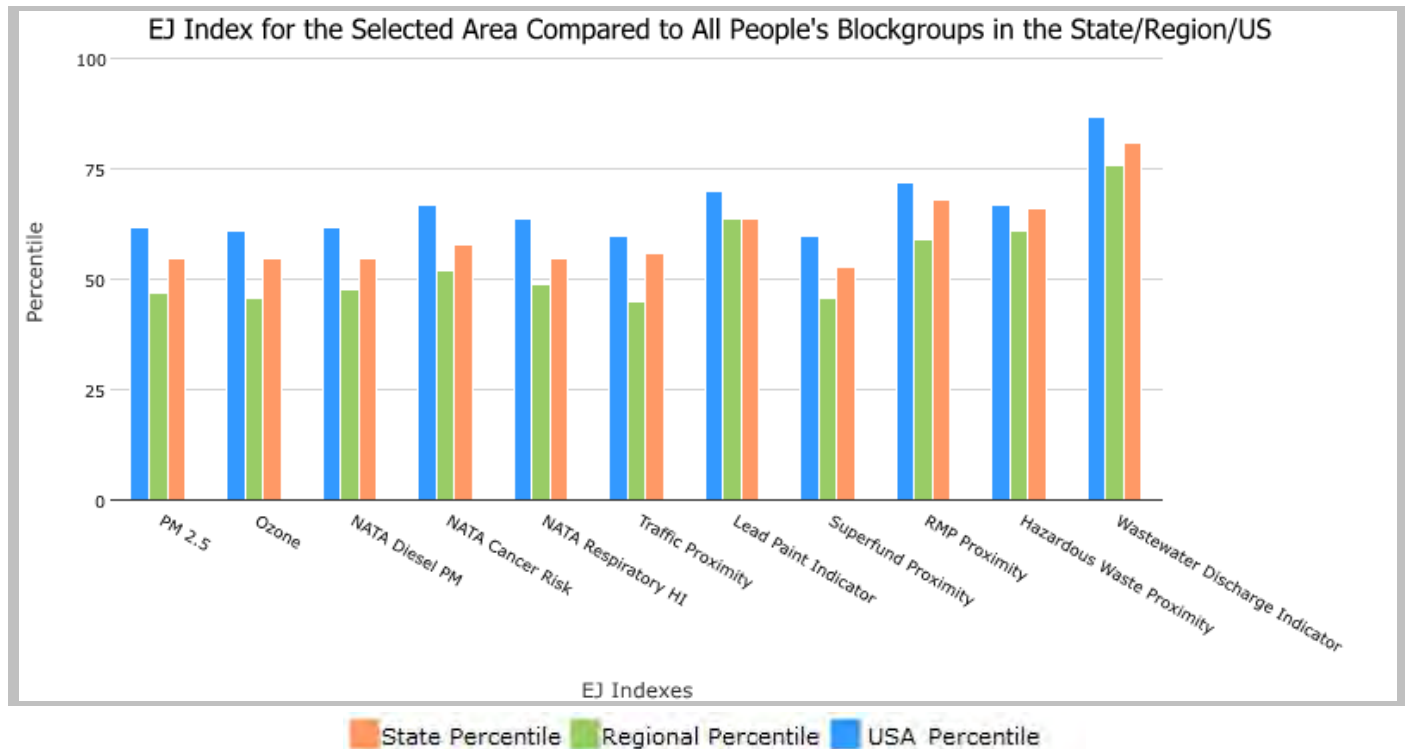
2 miles Ring Centered at 30.068704,-90.909507, LOUISIANA, EPA Region 6

Approximate Population: 593

Input Area (sq. miles): 12.56

Proposed Formosa Plastics Site

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	55	47	62
EJ Index for Ozone	55	46	61
EJ Index for NATA* Diesel PM	55	48	62
EJ Index for NATA* Air Toxics Cancer Risk	58	52	67
EJ Index for NATA* Respiratory Hazard Index	55	49	64
EJ Index for Traffic Proximity and Volume	56	45	60
EJ Index for Lead Paint Indicator	64	64	70
EJ Index for Superfund Proximity	53	46	60
EJ Index for RMP Proximity	68	59	72
EJ Index for Hazardous Waste Proximity	66	61	67
EJ Index for Wastewater Discharge Indicator	81	76	87



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

2 miles Ring Centered at 30.068704,-90.909507, LOUISIANA, EPA Region 6

Approximate Population: 593

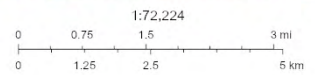
Input Area (sq. miles): 12.56

Proposed Formosa Plastics Site



January 31, 2022

- ✦ Proposed Formosa Plastics Site
- ✦ Search Result (point)



Earthstar Geographics

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	2

EJSCREEN Report (Version 2020)



2 miles Ring Centered at 30.068704,-90.909507, LOUISIANA, EPA Region 6

Approximate Population: 593

Input Area (sq. miles): 12.56

Proposed Formosa Plastics Site

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.97	8.91	66	8.95	35	8.55	63
Ozone (ppb)	34.7	36.2	14	41.8	8	42.9	9
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.346	0.455	46	0.401	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	72	51	92	36	95-100th	32	95-100th
NATA* Respiratory Hazard Index	0.63	0.61	73	0.45	95-100th	0.44	90-95th
Traffic Proximity and Volume (daily traffic count/distance to road)	14	330	20	400	13	750	13
Lead Paint Indicator (% Pre-1960 Housing)	0.25	0.21	73	0.17	77	0.28	58
Superfund Proximity (site count/km distance)	0.021	0.086	23	0.081	29	0.13	18
RMP Proximity (facility count/km distance)	1.4	0.9	79	0.82	83	0.74	84
Hazardous Waste Proximity (facility count/km distance)	1.5	1.5	63	0.99	78	5	59
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.01	1.7	80	9.5	79	9.4	79
Demographic Indicators							
Demographic Index	43%	40%	60	44%	53	36%	67
People of Color Population	59%	41%	72	52%	59	39%	72
Low Income Population	27%	39%	32	37%	38	33%	47
Linguistically Isolated Population	0%	2%	62	6%	36	4%	45
Population With Less Than High School Education	21%	15%	72	16%	70	13%	80
Population Under 5 years of age	4%	7%	24	7%	20	6%	26
Population over 64 years of age	12%	15%	42	13%	53	15%	43

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

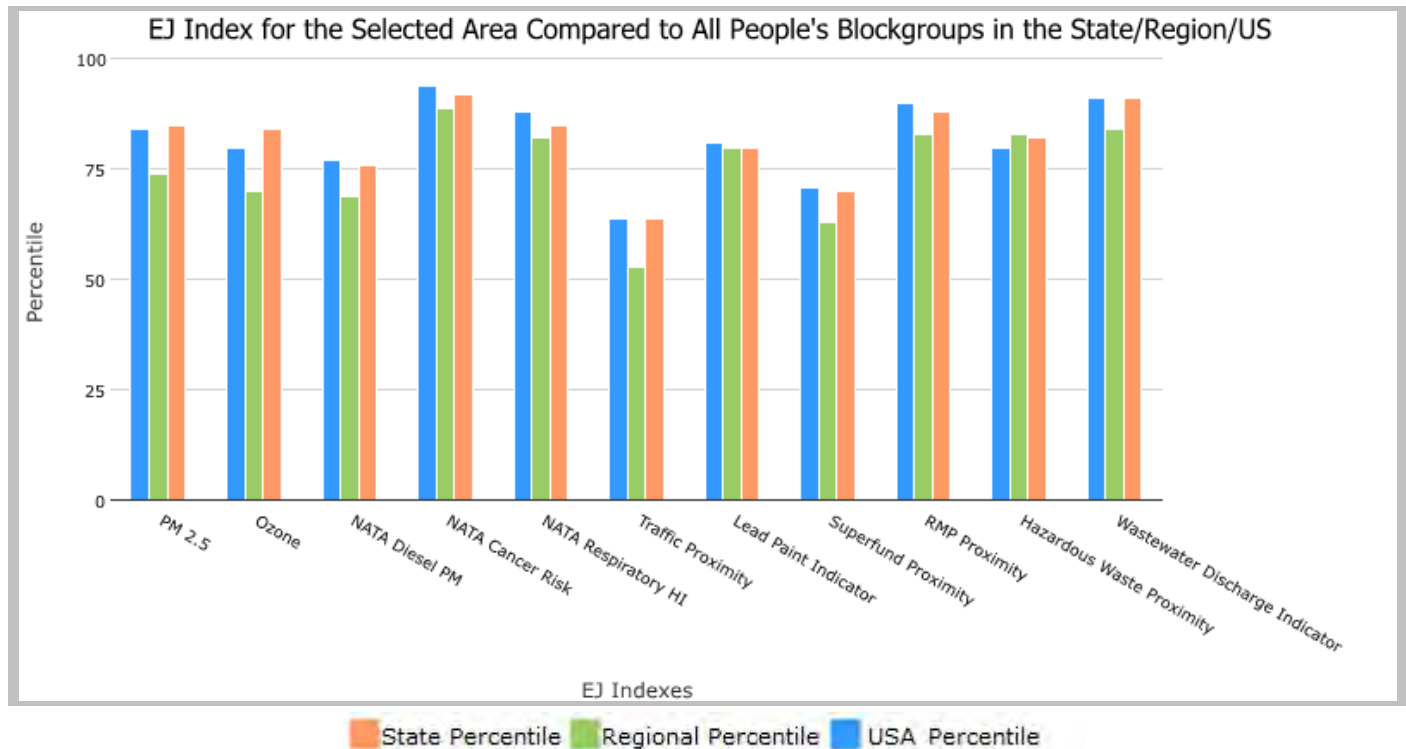
3 miles Ring Centered at 30.068704,-90.909507, LOUISIANA, EPA Region 6

Approximate Population: 2,630

Input Area (sq. miles): 28.27

Proposed Formosa Plastics Site

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	85	74	84
EJ Index for Ozone	84	70	80
EJ Index for NATA* Diesel PM	76	69	77
EJ Index for NATA* Air Toxics Cancer Risk	92	89	94
EJ Index for NATA* Respiratory Hazard Index	85	82	88
EJ Index for Traffic Proximity and Volume	64	53	64
EJ Index for Lead Paint Indicator	80	80	81
EJ Index for Superfund Proximity	70	63	71
EJ Index for RMP Proximity	88	83	90
EJ Index for Hazardous Waste Proximity	82	83	80
EJ Index for Wastewater Discharge Indicator	91	84	91



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

3 miles Ring Centered at 30.068704,-90.909507, LOUISIANA, EPA Region 6

Approximate Population: 2,630

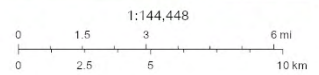
Input Area (sq. miles): 28.27

Proposed Formosa Plastics Site



January 31, 2022

- ✦ Proposed Formosa Plastics Site
- ✦ Search Result (point)



Earthstar Geographics

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	3

EJSCREEN Report (Version 2020)



3 miles Ring Centered at 30.068704,-90.909507, LOUISIANA, EPA Region 6

Approximate Population: 2,630

Input Area (sq. miles): 28.27

Proposed Formosa Plastics Site

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.97	8.91	66	8.95	35	8.55	63
Ozone (ppb)	34.4	36.2	8	41.8	6	42.9	8
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.325	0.455	42	0.401	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	71	51	91	36	95-100th	32	95-100th
NATA* Respiratory Hazard Index	0.64	0.61	75	0.45	95-100th	0.44	90-95th
Traffic Proximity and Volume (daily traffic count/distance to road)	20	330	23	400	17	750	15
Lead Paint Indicator (% Pre-1960 Housing)	0.19	0.21	64	0.17	71	0.28	52
Superfund Proximity (site count/km distance)	0.021	0.086	22	0.081	28	0.13	18
RMP Proximity (facility count/km distance)	1.6	0.9	81	0.82	85	0.74	86
Hazardous Waste Proximity (facility count/km distance)	1.4	1.5	61	0.99	77	5	58
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0083	1.7	77	9.5	77	9.4	78
Demographic Indicators							
Demographic Index	66%	40%	81	44%	78	36%	86
People of Color Population	78%	41%	82	52%	74	39%	82
Low Income Population	51%	39%	71	37%	74	33%	81
Linguistically Isolated Population	0%	2%	62	6%	36	4%	45
Population With Less Than High School Education	24%	15%	81	16%	76	13%	85
Population Under 5 years of age	5%	7%	42	7%	37	6%	45
Population over 64 years of age	12%	15%	39	13%	51	15%	41

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

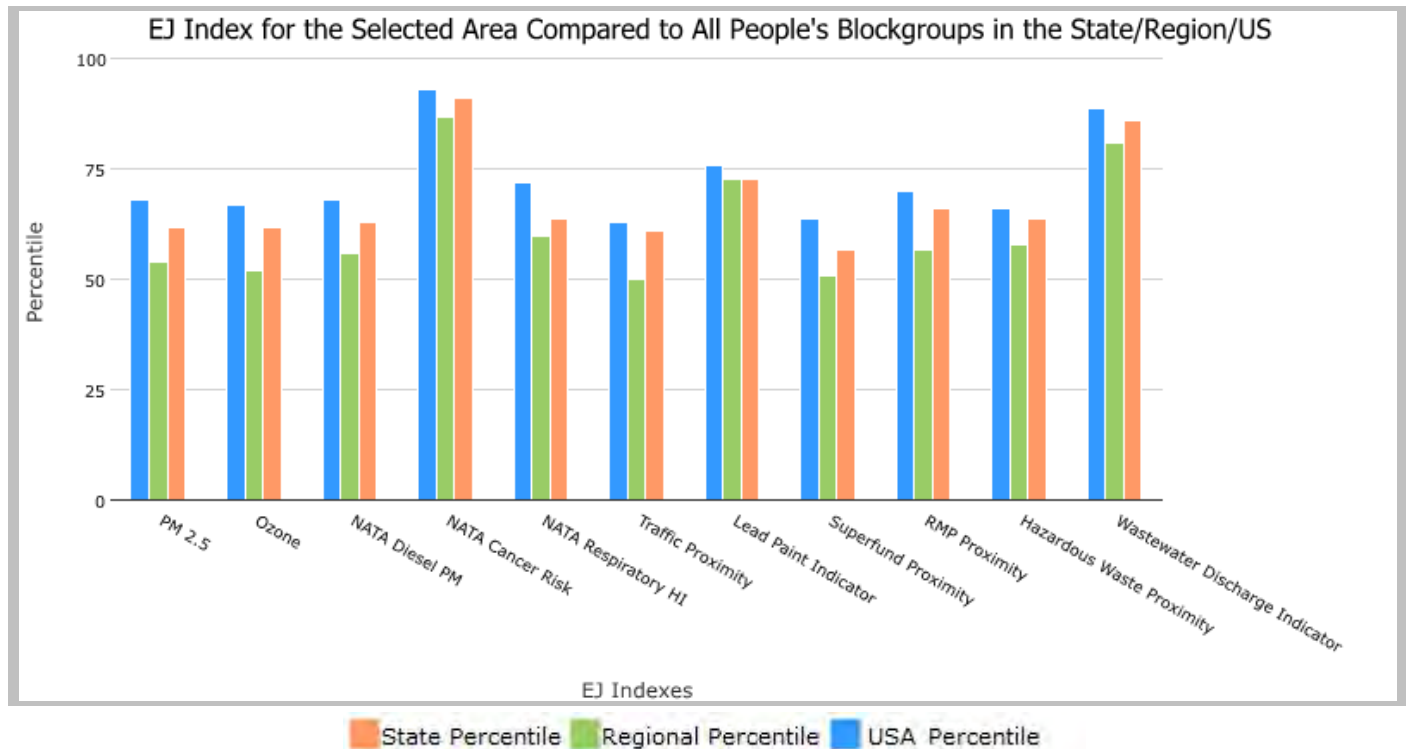
2 miles Ring Centered at 30.044961,-90.663228, LOUISIANA, EPA Region 6

Approximate Population: 3,434

Input Area (sq. miles): 12.56

Greenfield Proposed Grain Terminal

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	62	54	68
EJ Index for Ozone	62	52	67
EJ Index for NATA* Diesel PM	63	56	68
EJ Index for NATA* Air Toxics Cancer Risk	91	87	93
EJ Index for NATA* Respiratory Hazard Index	64	60	72
EJ Index for Traffic Proximity and Volume	61	50	63
EJ Index for Lead Paint Indicator	73	73	76
EJ Index for Superfund Proximity	57	51	64
EJ Index for RMP Proximity	66	57	70
EJ Index for Hazardous Waste Proximity	64	58	66
EJ Index for Wastewater Discharge Indicator	86	81	89



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

2 miles Ring Centered at 30.044961,-90.663228, LOUISIANA, EPA Region 6

Approximate Population: 3,434

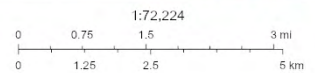
Input Area (sq. miles): 12.56

Greenfield Proposed Grain Terminal



January 31, 2022

✚ Greenfield Proposed Grain Terminal



Earthstar Geographics

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	2

EJSCREEN Report (Version 2020)



2 miles Ring Centered at 30.044961,-90.663228, LOUISIANA, EPA Region 6

Approximate Population: 3,434

Input Area (sq. miles): 12.56

Greenfield Proposed Grain Terminal

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.87	8.91	56	8.95	31	8.55	60
Ozone (ppb)	35.3	36.2	27	41.8	10	42.9	11
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.375	0.455	49	0.401	50-60th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	160	51	98	36	95-100th	32	95-100th
NATA* Respiratory Hazard Index	0.68	0.61	81	0.45	95-100th	0.44	90-95th
Traffic Proximity and Volume (daily traffic count/distance to road)	29	330	26	400	20	750	18
Lead Paint Indicator (% Pre-1960 Housing)	0.25	0.21	72	0.17	76	0.28	57
Superfund Proximity (site count/km distance)	0.019	0.086	19	0.081	25	0.13	17
RMP Proximity (facility count/km distance)	0.51	0.9	57	0.82	56	0.74	60
Hazardous Waste Proximity (facility count/km distance)	0.46	1.5	40	0.99	51	5	36
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0092	1.7	78	9.5	78	9.4	79
Demographic Indicators							
Demographic Index	49%	40%	67	44%	60	36%	73
People of Color Population	60%	41%	72	52%	60	39%	73
Low Income Population	38%	39%	51	37%	55	33%	65
Linguistically Isolated Population	0%	2%	62	6%	36	4%	45
Population With Less Than High School Education	16%	15%	59	16%	60	13%	71
Population Under 5 years of age	6%	7%	49	7%	44	6%	53
Population over 64 years of age	16%	15%	62	13%	69	15%	60

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

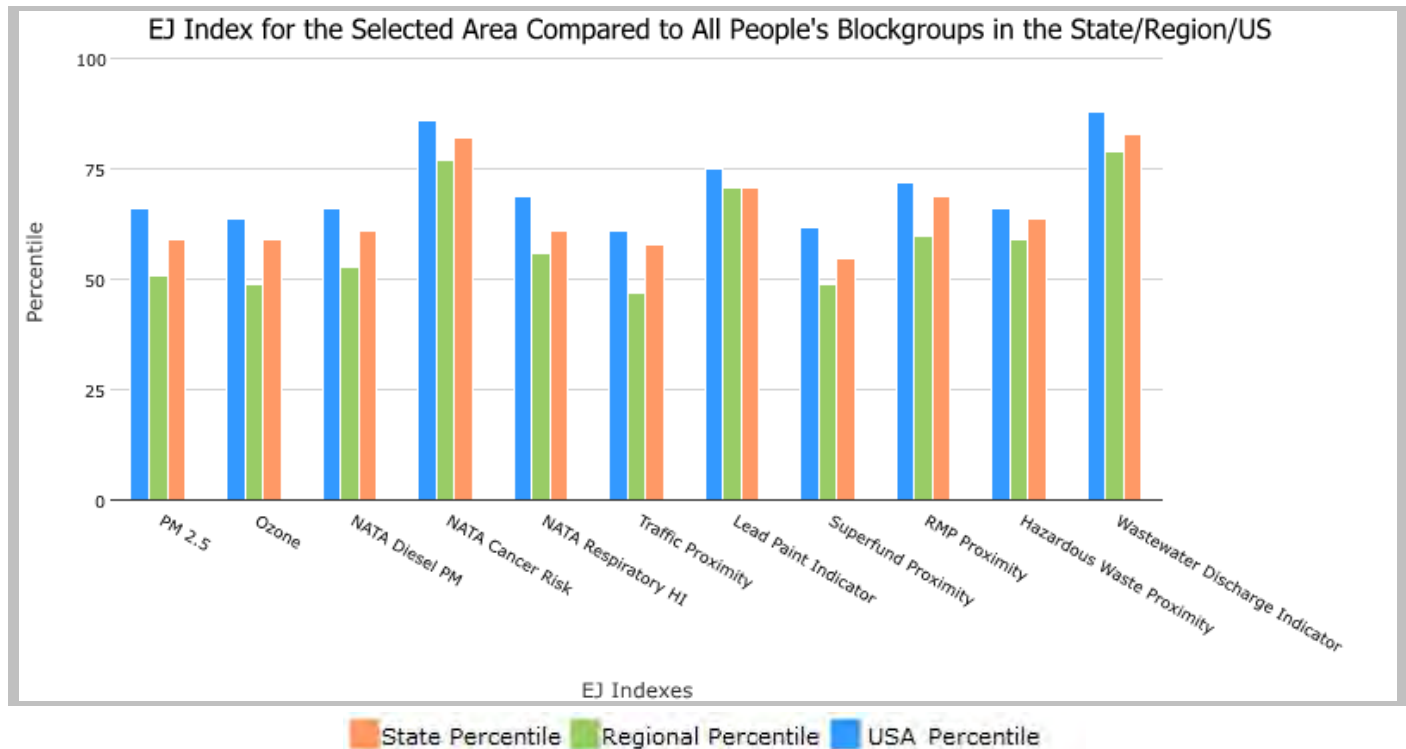
3 miles Ring Centered at 30.044961,-90.663228, LOUISIANA, EPA Region 6

Approximate Population: 9,572

Input Area (sq. miles): 28.27

Greenfield Proposed Grain Terminal

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	59	51	66
EJ Index for Ozone	59	49	64
EJ Index for NATA* Diesel PM	61	53	66
EJ Index for NATA* Air Toxics Cancer Risk	82	77	86
EJ Index for NATA* Respiratory Hazard Index	61	56	69
EJ Index for Traffic Proximity and Volume	58	47	61
EJ Index for Lead Paint Indicator	71	71	75
EJ Index for Superfund Proximity	55	49	62
EJ Index for RMP Proximity	69	60	72
EJ Index for Hazardous Waste Proximity	64	59	66
EJ Index for Wastewater Discharge Indicator	83	79	88



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

3 miles Ring Centered at 30.044961,-90.663228, LOUISIANA, EPA Region 6

Approximate Population: 9,572

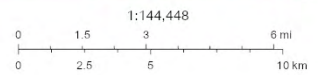
Input Area (sq. miles): 28.27

Greenfield Proposed Grain Terminal



January 31, 2022

✚ Greenfield Proposed Grain Terminal



Earthstar Geographics

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	2

EJSCREEN Report (Version 2020)



3 miles Ring Centered at 30.044961,-90.663228, LOUISIANA, EPA Region 6

Approximate Population: 9,572

Input Area (sq. miles): 28.27

Greenfield Proposed Grain Terminal

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.88	8.91	59	8.95	32	8.55	60
Ozone (ppb)	35.3	36.2	27	41.8	10	42.9	11
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.385	0.455	51	0.401	50-60th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	150	51	98	36	95-100th	32	95-100th
NATA* Respiratory Hazard Index	0.69	0.61	82	0.45	95-100th	0.44	90-95th
Traffic Proximity and Volume (daily traffic count/distance to road)	17	330	21	400	15	750	14
Lead Paint Indicator (% Pre-1960 Housing)	0.28	0.21	76	0.17	79	0.28	61
Superfund Proximity (site count/km distance)	0.019	0.086	18	0.081	25	0.13	16
RMP Proximity (facility count/km distance)	0.89	0.9	67	0.82	70	0.74	73
Hazardous Waste Proximity (facility count/km distance)	0.69	1.5	46	0.99	59	5	43
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0076	1.7	76	9.5	76	9.4	78
Demographic Indicators							
Demographic Index	47%	40%	64	44%	57	36%	71
People of Color Population	52%	41%	66	52%	52	39%	68
Low Income Population	42%	39%	57	37%	61	33%	70
Linguistically Isolated Population	0%	2%	62	6%	36	4%	45
Population With Less Than High School Education	15%	15%	56	16%	58	13%	69
Population Under 5 years of age	6%	7%	53	7%	48	6%	57
Population over 64 years of age	18%	15%	74	13%	78	15%	70

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

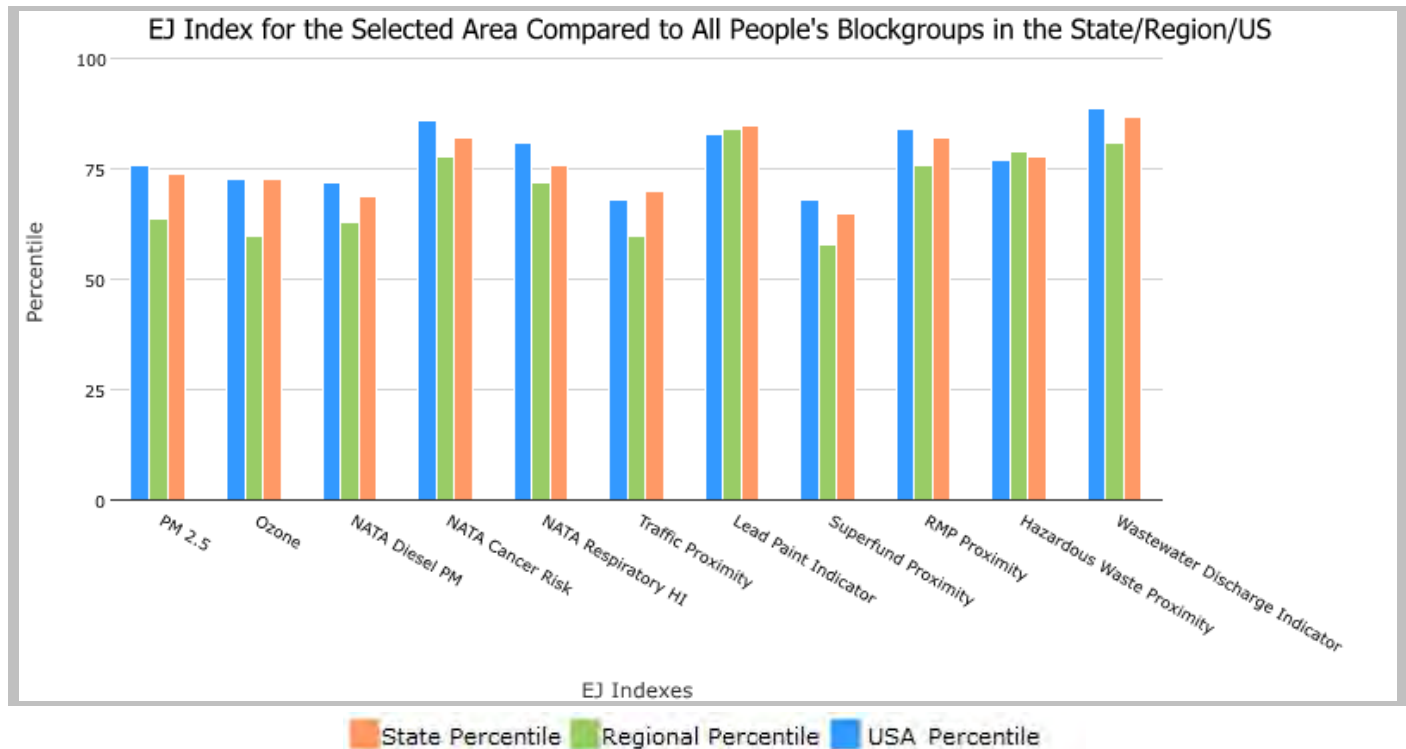
2 miles Ring Centered at 30.181599,-91.007083, LOUISIANA, EPA Region 6

Approximate Population: 193

Input Area (sq. miles): 12.56

IMTT (8112 Hwy 75 Geismar)

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	74	64	76
EJ Index for Ozone	73	60	73
EJ Index for NATA* Diesel PM	69	63	72
EJ Index for NATA* Air Toxics Cancer Risk	82	78	86
EJ Index for NATA* Respiratory Hazard Index	76	72	81
EJ Index for Traffic Proximity and Volume	70	60	68
EJ Index for Lead Paint Indicator	85	84	83
EJ Index for Superfund Proximity	65	58	68
EJ Index for RMP Proximity	82	76	84
EJ Index for Hazardous Waste Proximity	78	79	77
EJ Index for Wastewater Discharge Indicator	87	81	89



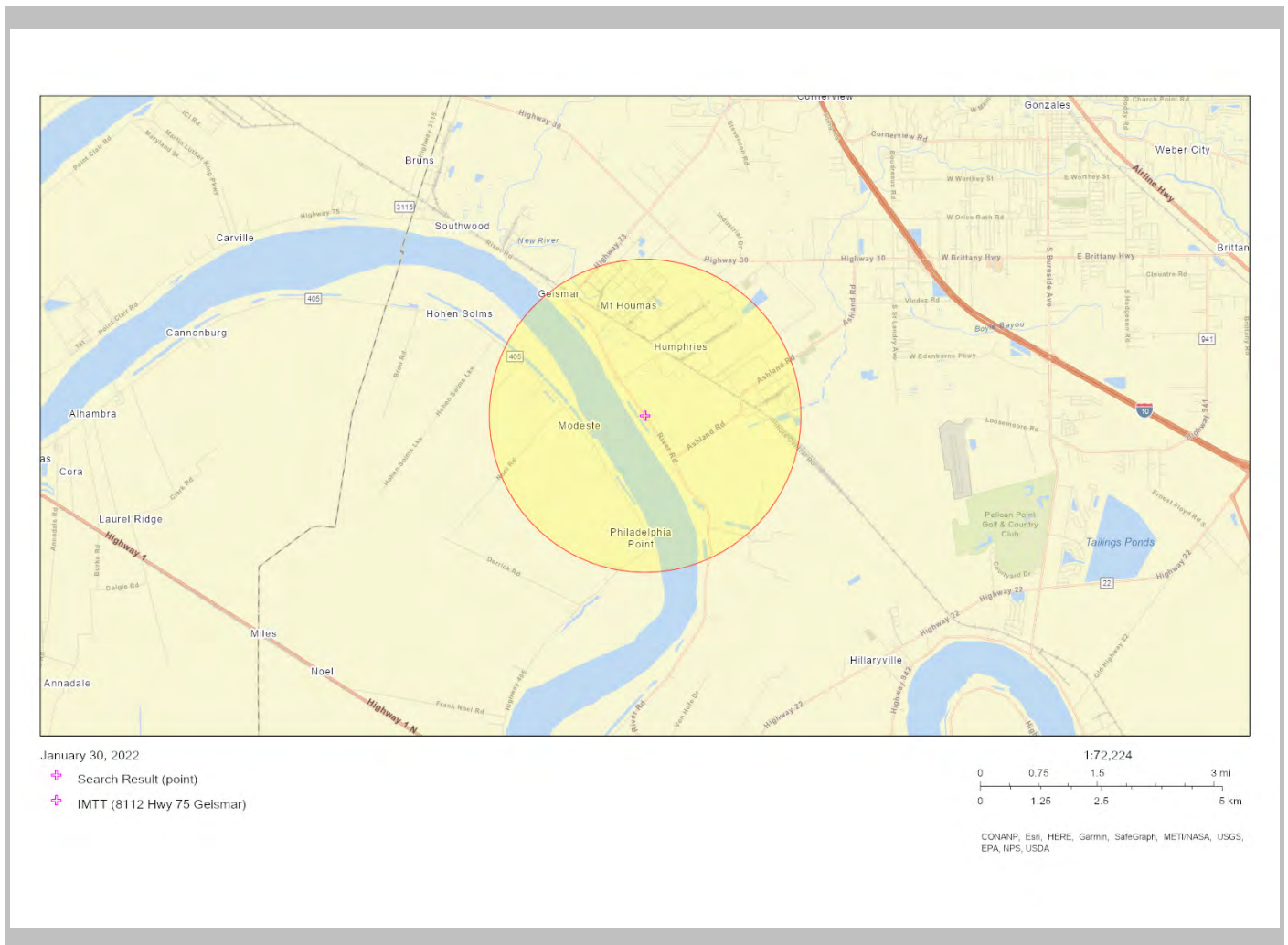
This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

2 miles Ring Centered at 30.181599,-91.007083, LOUISIANA, EPA Region 6

Approximate Population: 193

Input Area (sq. miles): 12.56

IMTT (8112 Hwy 75 Geismar)



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	16

EJSCREEN Report (Version 2020)



2 miles Ring Centered at 30.181599,-91.007083, LOUISIANA, EPA Region 6

Approximate Population: 193

Input Area (sq. miles): 12.56

IMTT (8112 Hwy 75 Geismar)

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	9.19	8.91	75	8.95	47	8.55	70
Ozone (ppb)	35	36.2	23	41.8	9	42.9	10
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.33	0.455	42	0.401	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	78	51	93	36	95-100th	32	95-100th
NATA* Respiratory Hazard Index	0.68	0.61	80	0.45	95-100th	0.44	90-95th
Traffic Proximity and Volume (daily traffic count/distance to road)	78	330	42	400	35	750	31
Lead Paint Indicator (% Pre-1960 Housing)	0.28	0.21	76	0.17	79	0.28	61
Superfund Proximity (site count/km distance)	0.022	0.086	26	0.081	31	0.13	20
RMP Proximity (facility count/km distance)	1	0.9	70	0.82	75	0.74	77
Hazardous Waste Proximity (facility count/km distance)	1.3	1.5	58	0.99	74	5	55
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0064	1.7	74	9.5	74	9.4	77
Demographic Indicators							
Demographic Index	67%	40%	82	44%	80	36%	87
People of Color Population	70%	41%	78	52%	67	39%	78
Low Income Population	64%	39%	85	37%	87	33%	91
Linguistically Isolated Population	3%	2%	79	6%	54	4%	63
Population With Less Than High School Education	20%	15%	71	16%	69	13%	79
Population Under 5 years of age	5%	7%	42	7%	37	6%	45
Population over 64 years of age	11%	15%	37	13%	48	15%	37

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

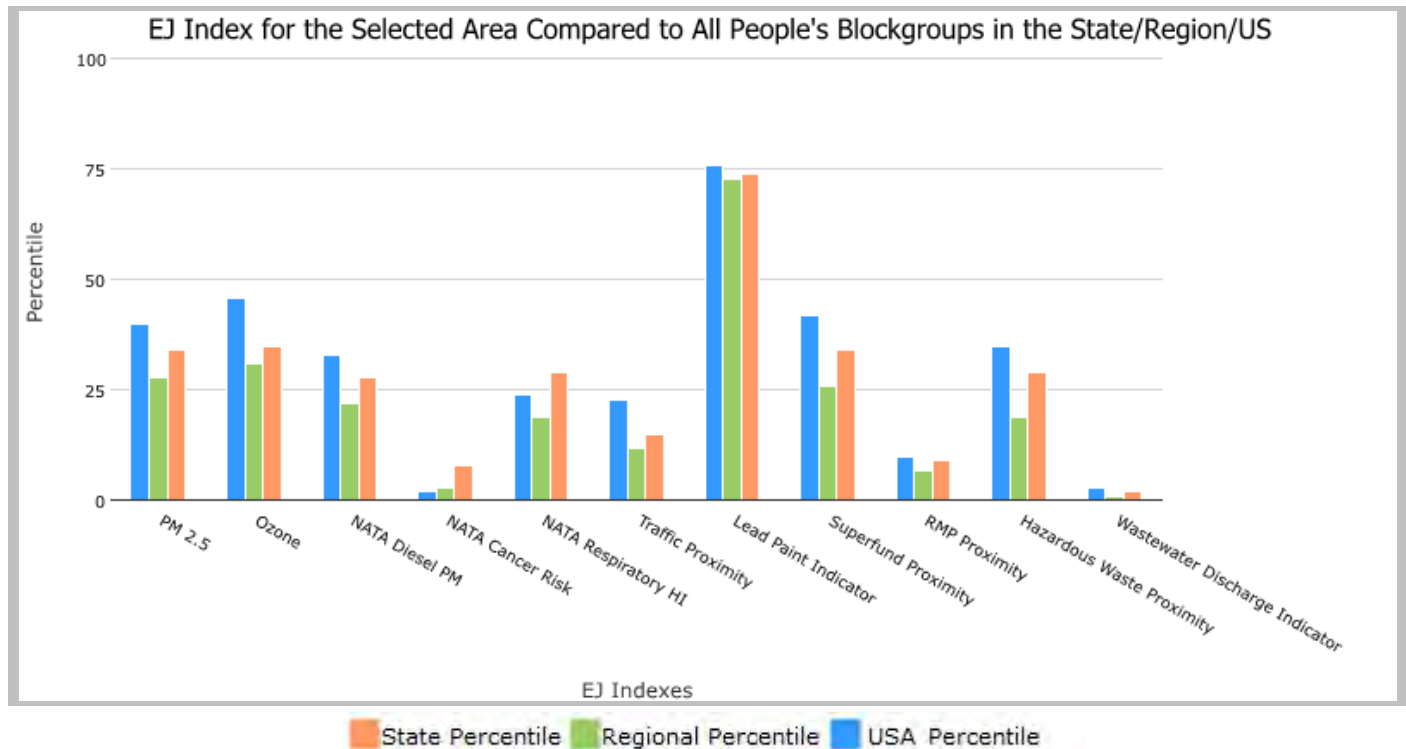
3 miles Ring Centered at 30.181595,-91.007086, LOUISIANA, EPA Region 6

Approximate Population: 495

Input Area (sq. miles): 28.27

IMTT (8112 Hwy 75 Geismar)

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	34	28	40
EJ Index for Ozone	35	31	46
EJ Index for NATA* Diesel PM	28	22	33
EJ Index for NATA* Air Toxics Cancer Risk	8	3	2
EJ Index for NATA* Respiratory Hazard Index	29	19	24
EJ Index for Traffic Proximity and Volume	15	12	23
EJ Index for Lead Paint Indicator	74	73	76
EJ Index for Superfund Proximity	34	26	42
EJ Index for RMP Proximity	9	7	10
EJ Index for Hazardous Waste Proximity	29	19	35
EJ Index for Wastewater Discharge Indicator	2	1	3



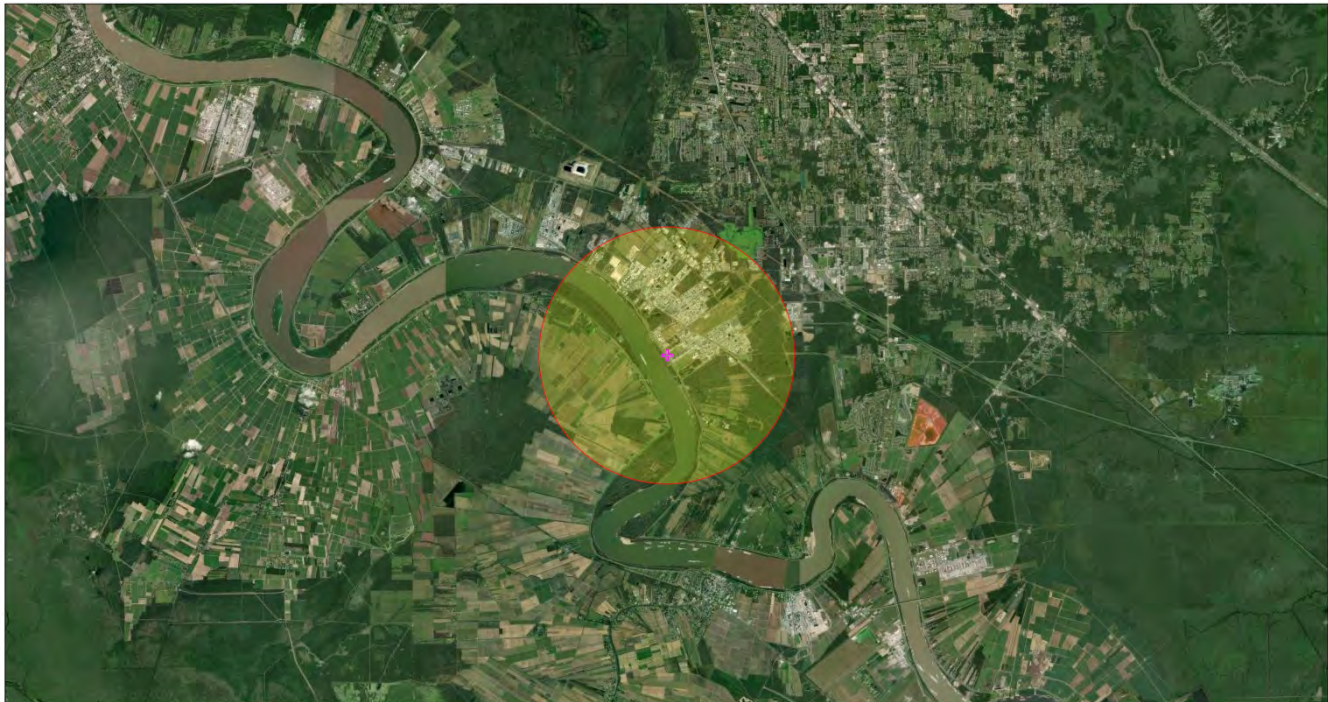
This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

3 miles Ring Centered at 30.181595,-91.007086, LOUISIANA, EPA Region 6

Approximate Population: 495

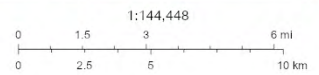
Input Area (sq. miles): 28.27

IMTT (8112 Hwy 75 Geismar)



January 31, 2022

- ✦ IMTT (8112 Hwy 75 Geismar)
- ✦ Search Result (point)



Earthstar Geographics

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	17

EJSCREEN Report (Version 2020)



3 miles Ring Centered at 30.181595,-91.007086, LOUISIANA, EPA Region 6

Approximate Population: 495

Input Area (sq. miles): 28.27

IMTT (8112 Hwy 75 Geismar)

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	9.25	8.91	77	8.95	51	8.55	72
Ozone (ppb)	35.2	36.2	26	41.8	9	42.9	11
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.355	0.455	47	0.401	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	100	51	96	36	95-100th	32	95-100th
NATA* Respiratory Hazard Index	0.71	0.61	84	0.45	95-100th	0.44	95-100th
Traffic Proximity and Volume (daily traffic count/distance to road)	120	330	51	400	45	750	38
Lead Paint Indicator (% Pre-1960 Housing)	0.19	0.21	64	0.17	71	0.28	51
Superfund Proximity (site count/km distance)	0.025	0.086	29	0.081	34	0.13	22
RMP Proximity (facility count/km distance)	1.1	0.9	72	0.82	77	0.74	79
Hazardous Waste Proximity (facility count/km distance)	1.2	1.5	56	0.99	72	5	53
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.085	1.7	92	9.5	90	9.4	88
Demographic Indicators							
Demographic Index	49%	40%	67	44%	60	36%	72
People of Color Population	56%	41%	69	52%	56	39%	70
Low Income Population	41%	39%	56	37%	60	33%	69
Linguistically Isolated Population	2%	2%	73	6%	47	4%	57
Population With Less Than High School Education	14%	15%	50	16%	53	13%	65
Population Under 5 years of age	6%	7%	46	7%	41	6%	50
Population over 64 years of age	10%	15%	28	13%	40	15%	29

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

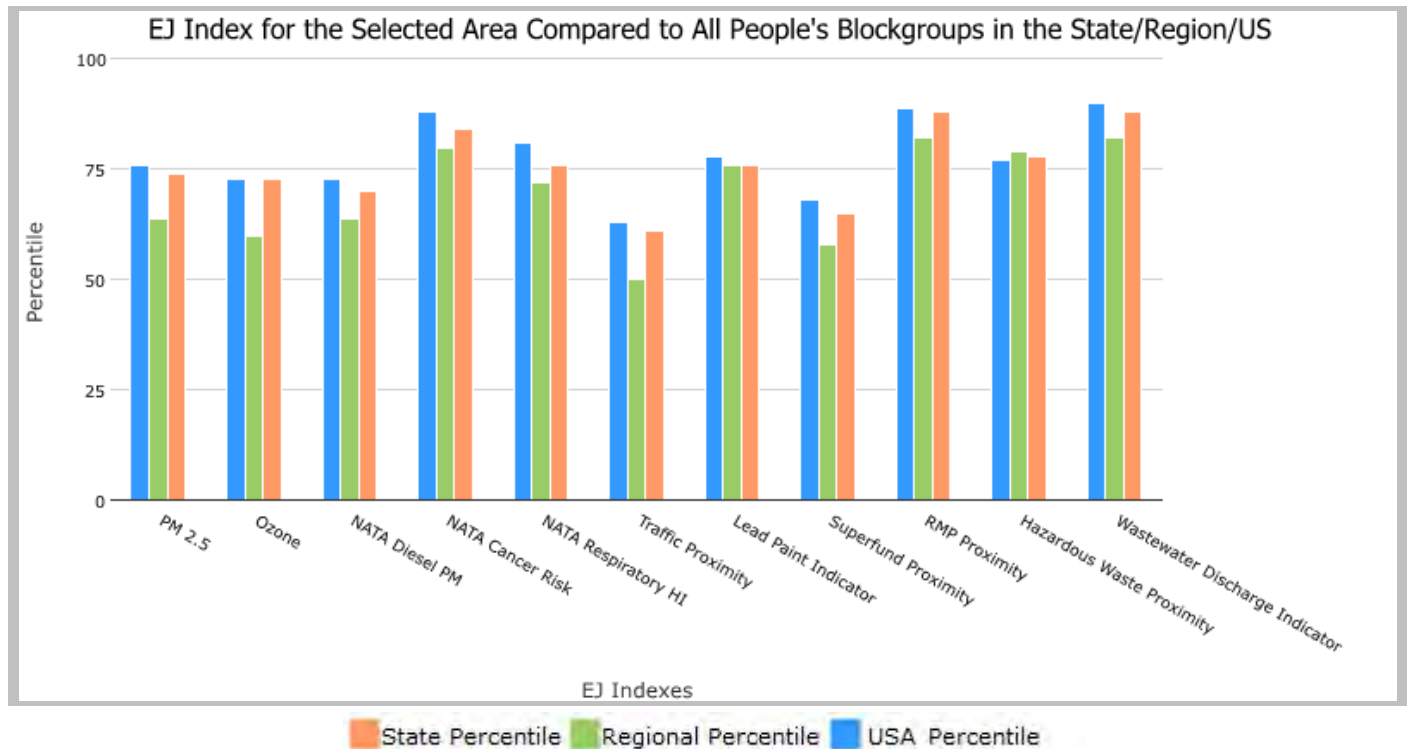
2 miles Ring Centered at 30.083493,-90.913772, LOUISIANA, EPA Region 6

Approximate Population: 1,506

Input Area (sq. miles): 12.56

Mosaic Faustina

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	74	64	76
EJ Index for Ozone	73	60	73
EJ Index for NATA* Diesel PM	70	64	73
EJ Index for NATA* Air Toxics Cancer Risk	84	80	88
EJ Index for NATA* Respiratory Hazard Index	76	72	81
EJ Index for Traffic Proximity and Volume	61	50	63
EJ Index for Lead Paint Indicator	76	76	78
EJ Index for Superfund Proximity	65	58	68
EJ Index for RMP Proximity	88	82	89
EJ Index for Hazardous Waste Proximity	78	79	77
EJ Index for Wastewater Discharge Indicator	88	82	90



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

2 miles Ring Centered at 30.083493,-90.913772, LOUISIANA, EPA Region 6

Approximate Population: 1,506

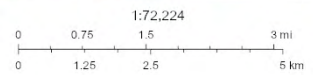
Input Area (sq. miles): 12.56

Mosaic Faustina



January 31, 2022

- ✚ Mosaic Faustina
- ✚ Search Result (point)



Earthstar Geographics

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	3

EJSCREEN Report (Version 2020)



2 miles Ring Centered at 30.083493,-90.913772, LOUISIANA, EPA Region 6

Approximate Population: 1,506

Input Area (sq. miles): 12.56

Mosaic Faustina

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	9.04	8.91	71	8.95	38	8.55	65
Ozone (ppb)	34.6	36.2	12	41.8	7	42.9	9
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.358	0.455	47	0.401	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	74	51	92	36	95-100th	32	95-100th
NATA* Respiratory Hazard Index	0.66	0.61	78	0.45	95-100th	0.44	90-95th
Traffic Proximity and Volume (daily traffic count/distance to road)	19	330	22	400	16	750	15
Lead Paint Indicator (% Pre-1960 Housing)	0.24	0.21	71	0.17	76	0.28	57
Superfund Proximity (site count/km distance)	0.021	0.086	24	0.081	29	0.13	19
RMP Proximity (facility count/km distance)	2	0.9	85	0.82	89	0.74	90
Hazardous Waste Proximity (facility count/km distance)	1.6	1.5	64	0.99	79	5	60
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0092	1.7	78	9.5	78	9.4	79
Demographic Indicators							
Demographic Index	57%	40%	75	44%	69	36%	80
People of Color Population	66%	41%	75	52%	64	39%	76
Low Income Population	45%	39%	62	37%	65	33%	73
Linguistically Isolated Population	0%	2%	62	6%	36	4%	45
Population With Less Than High School Education	24%	15%	81	16%	76	13%	85
Population Under 5 years of age	6%	7%	49	7%	44	6%	53
Population over 64 years of age	12%	15%	39	13%	50	15%	40

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

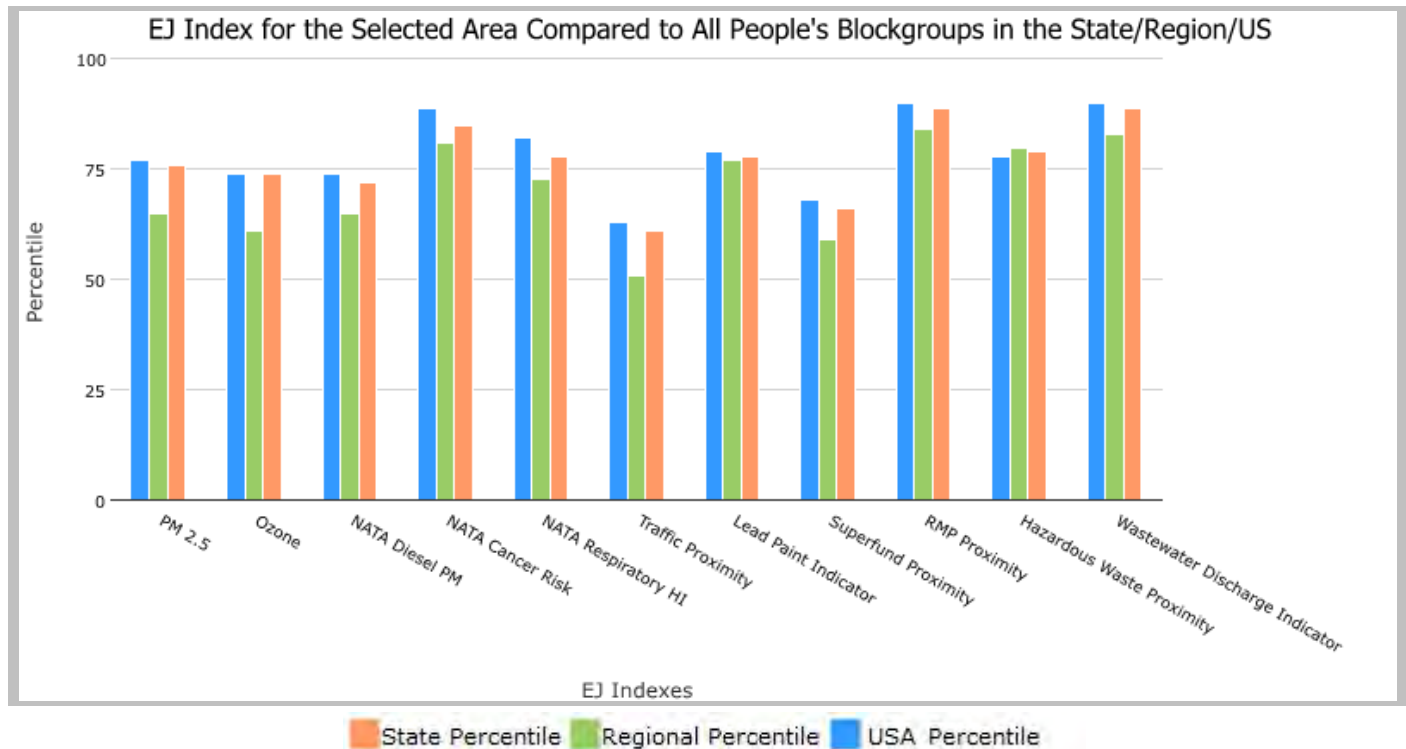
3 miles Ring Centered at 30.083493,-90.913772, LOUISIANA, EPA Region 6

Approximate Population: 1,919

Input Area (sq. miles): 28.27

Mosaic Faustina

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	76	65	77
EJ Index for Ozone	74	61	74
EJ Index for NATA* Diesel PM	72	65	74
EJ Index for NATA* Air Toxics Cancer Risk	85	81	89
EJ Index for NATA* Respiratory Hazard Index	78	73	82
EJ Index for Traffic Proximity and Volume	61	51	63
EJ Index for Lead Paint Indicator	78	77	79
EJ Index for Superfund Proximity	66	59	68
EJ Index for RMP Proximity	89	84	90
EJ Index for Hazardous Waste Proximity	79	80	78
EJ Index for Wastewater Discharge Indicator	89	83	90



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

3 miles Ring Centered at 30.083493,-90.913772, LOUISIANA, EPA Region 6

Approximate Population: 1,919

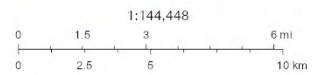
Input Area (sq. miles): 28.27

Mosaic Faustina



January 31, 2022

- ✚ Mosaic Faustina
- ✚ Search Result (point)



Earthstar Geographics

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	5

EJSCREEN Report (Version 2020)



3 miles Ring Centered at 30.083493,-90.913772, LOUISIANA, EPA Region 6

Approximate Population: 1,919

Input Area (sq. miles): 28.27

Mosaic Faustina

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	9.05	8.91	71	8.95	39	8.55	66
Ozone (ppb)	34.6	36.2	13	41.8	7	42.9	9
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.363	0.455	47	0.401	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	75	51	93	36	95-100th	32	95-100th
NATA* Respiratory Hazard Index	0.66	0.61	79	0.45	95-100th	0.44	90-95th
Traffic Proximity and Volume (daily traffic count/distance to road)	20	330	23	400	17	750	15
Lead Paint Indicator (% Pre-1960 Housing)	0.24	0.21	71	0.17	76	0.28	57
Superfund Proximity (site count/km distance)	0.021	0.086	24	0.081	29	0.13	19
RMP Proximity (facility count/km distance)	2.1	0.9	86	0.82	89	0.74	91
Hazardous Waste Proximity (facility count/km distance)	1.6	1.5	64	0.99	80	5	60
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0091	1.7	78	9.5	77	9.4	79
Demographic Indicators							
Demographic Index	58%	40%	76	44%	70	36%	81
People of Color Population	65%	41%	75	52%	64	39%	76
Low Income Population	48%	39%	66	37%	69	33%	77
Linguistically Isolated Population	0%	2%	62	6%	36	4%	45
Population With Less Than High School Education	25%	15%	82	16%	77	13%	85
Population Under 5 years of age	6%	7%	53	7%	48	6%	57
Population over 64 years of age	12%	15%	38	13%	50	15%	39

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

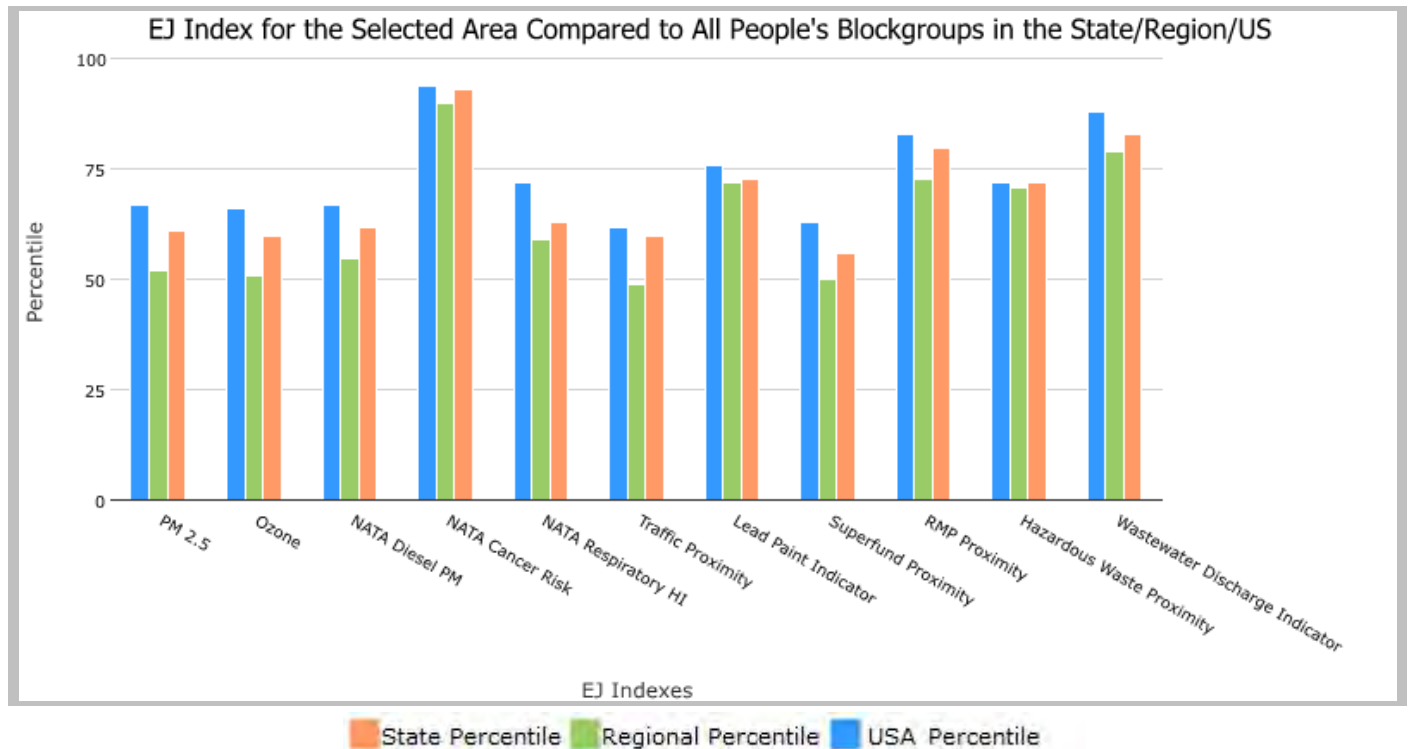
2 miles Ring Centered at 30.054528,-90.643386, LOUISIANA, EPA Region 6

Approximate Population: 2,362

Input Area (sq. miles): 12.56

Mt. Airy terminal

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	61	52	67
EJ Index for Ozone	60	51	66
EJ Index for NATA* Diesel PM	62	55	67
EJ Index for NATA* Air Toxics Cancer Risk	93	90	94
EJ Index for NATA* Respiratory Hazard Index	63	59	72
EJ Index for Traffic Proximity and Volume	60	49	62
EJ Index for Lead Paint Indicator	73	72	76
EJ Index for Superfund Proximity	56	50	63
EJ Index for RMP Proximity	80	73	83
EJ Index for Hazardous Waste Proximity	72	71	72
EJ Index for Wastewater Discharge Indicator	83	79	88



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

2 miles Ring Centered at 30.054528,-90.643386, LOUISIANA, EPA Region 6

Approximate Population: 2,362

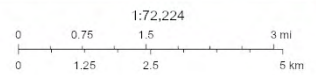
Input Area (sq. miles): 12.56

Mt. Airy terminal



January 31, 2022

- ✦ Mt. Airy terminal
- ✦ Search Result (point)



Earthstar Geographics

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	2

EJSCREEN Report (Version 2020)



2 miles Ring Centered at 30.054528,-90.643386, LOUISIANA, EPA Region 6

Approximate Population: 2,362

Input Area (sq. miles): 12.56

Mt. Airy terminal

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.88	8.91	58	8.95	31	8.55	60
Ozone (ppb)	35.5	36.2	32	41.8	11	42.9	12
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.381	0.455	50	0.401	50-60th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	240	51	99	36	95-100th	32	95-100th
NATA* Respiratory Hazard Index	0.76	0.61	92	0.45	95-100th	0.44	95-100th
Traffic Proximity and Volume (daily traffic count/distance to road)	21	330	23	400	17	750	16
Lead Paint Indicator (% Pre-1960 Housing)	0.31	0.21	79	0.17	81	0.28	64
Superfund Proximity (site count/km distance)	0.019	0.086	17	0.081	24	0.13	16
RMP Proximity (facility count/km distance)	2.8	0.9	92	0.82	94	0.74	95
Hazardous Waste Proximity (facility count/km distance)	2	1.5	70	0.99	84	5	65
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0074	1.7	76	9.5	76	9.4	77
Demographic Indicators							
Demographic Index	52%	40%	70	44%	64	36%	76
People of Color Population	57%	41%	69	52%	56	39%	70
Low Income Population	48%	39%	67	37%	69	33%	77
Linguistically Isolated Population	0%	2%	62	6%	36	4%	45
Population With Less Than High School Education	13%	15%	49	16%	52	13%	64
Population Under 5 years of age	8%	7%	65	7%	61	6%	70
Population over 64 years of age	17%	15%	67	13%	73	15%	64

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

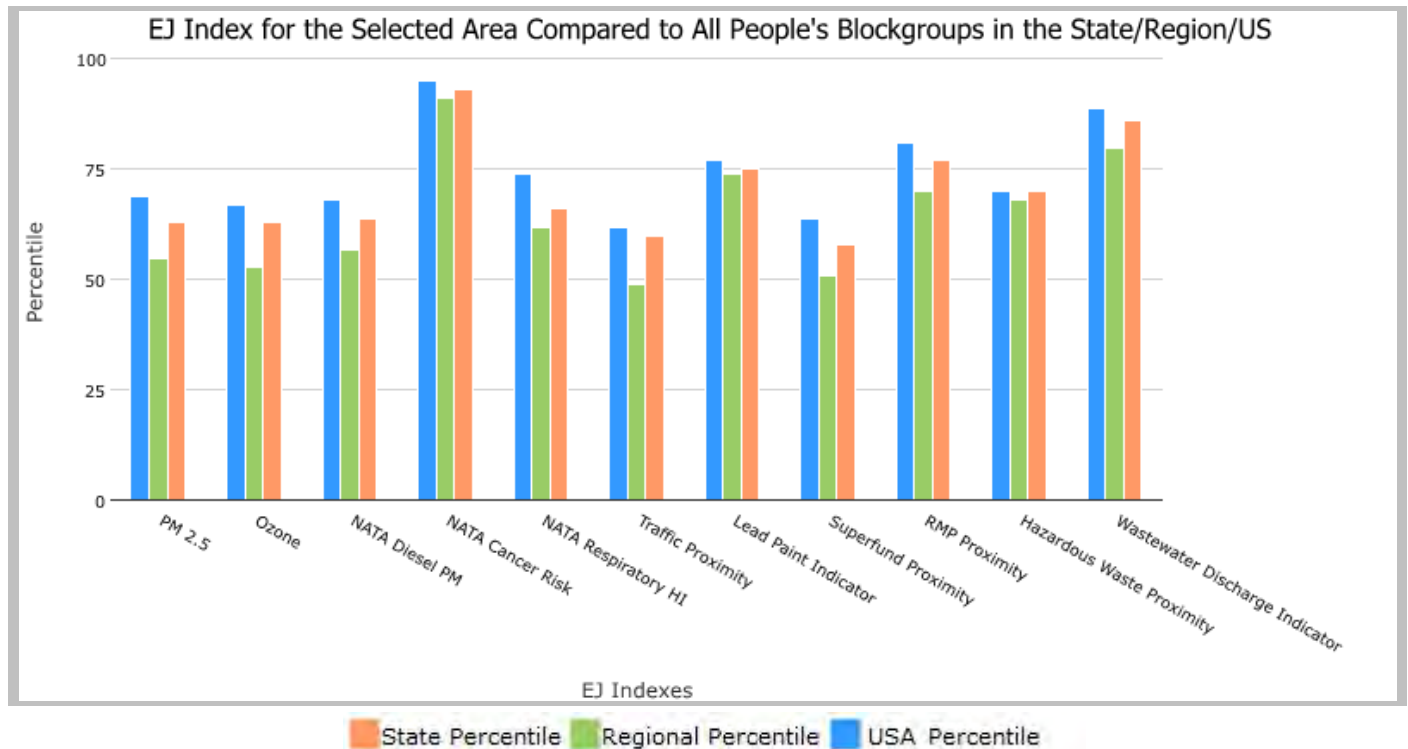
3 miles Ring Centered at 30.054528,-90.643386, LOUISIANA, EPA Region 6

Approximate Population: 4,832

Input Area (sq. miles): 28.27

Mt. Airy terminal

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	63	55	69
EJ Index for Ozone	63	53	67
EJ Index for NATA* Diesel PM	64	57	68
EJ Index for NATA* Air Toxics Cancer Risk	93	91	95
EJ Index for NATA* Respiratory Hazard Index	66	62	74
EJ Index for Traffic Proximity and Volume	60	49	62
EJ Index for Lead Paint Indicator	75	74	77
EJ Index for Superfund Proximity	58	51	64
EJ Index for RMP Proximity	77	70	81
EJ Index for Hazardous Waste Proximity	70	68	70
EJ Index for Wastewater Discharge Indicator	86	80	89



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

3 miles Ring Centered at 30.054528,-90.643386, LOUISIANA, EPA Region 6

Approximate Population: 4,832

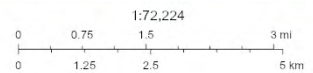
Input Area (sq. miles): 28.27

Mt. Airy terminal



January 31, 2022

- ✚ Mt. Airy terminal
- ✚ Search Result (point)



Earthstar Geographics

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	3

EJSCREEN Report (Version 2020)



3 miles Ring Centered at 30.054528,-90.643386, LOUISIANA, EPA Region 6

Approximate Population: 4,832

Input Area (sq. miles): 28.27

Mt. Airy terminal

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.87	8.91	56	8.95	31	8.55	60
Ozone (ppb)	35.5	36.2	31	41.8	10	42.9	12
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.378	0.455	49	0.401	50-60th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	200	51	98	36	95-100th	32	95-100th
NATA* Respiratory Hazard Index	0.72	0.61	86	0.45	95-100th	0.44	95-100th
Traffic Proximity and Volume (daily traffic count/distance to road)	22	330	24	400	17	750	16
Lead Paint Indicator (% Pre-1960 Housing)	0.28	0.21	76	0.17	79	0.28	61
Superfund Proximity (site count/km distance)	0.019	0.086	18	0.081	25	0.13	16
RMP Proximity (facility count/km distance)	1.7	0.9	82	0.82	86	0.74	87
Hazardous Waste Proximity (facility count/km distance)	1.2	1.5	57	0.99	73	5	54
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0082	1.7	77	9.5	77	9.4	78
Demographic Indicators							
Demographic Index	53%	40%	70	44%	64	36%	76
People of Color Population	63%	41%	74	52%	62	39%	74
Low Income Population	42%	39%	58	37%	61	33%	70
Linguistically Isolated Population	0%	2%	62	6%	36	4%	45
Population With Less Than High School Education	15%	15%	55	16%	57	13%	69
Population Under 5 years of age	7%	7%	56	7%	50	6%	60
Population over 64 years of age	16%	15%	60	13%	68	15%	58

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

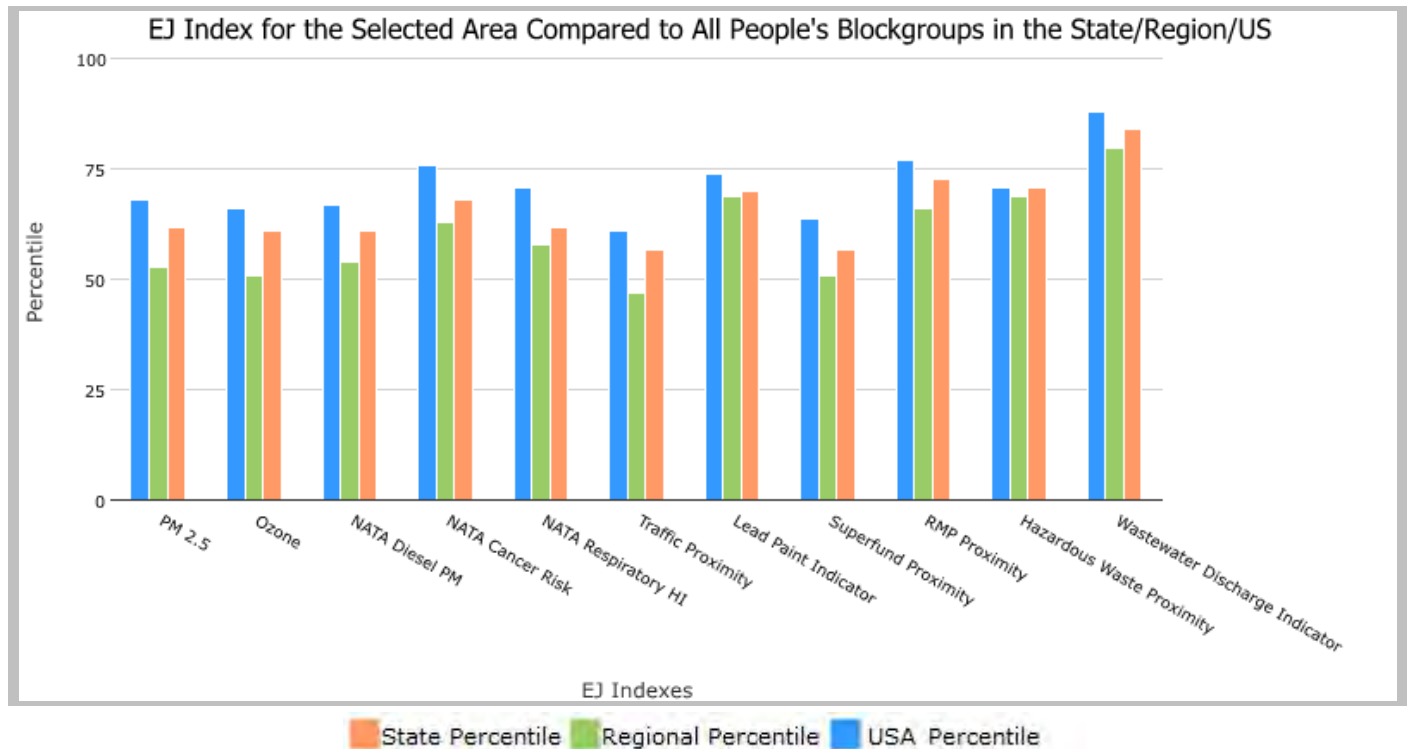
2 miles Ring Centered at 30.073515,-90.862445, LOUISIANA, EPA Region 6

Approximate Population: 394

Input Area (sq. miles): 12.56

Nucor

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	62	53	68
EJ Index for Ozone	61	51	66
EJ Index for NATA* Diesel PM	61	54	67
EJ Index for NATA* Air Toxics Cancer Risk	68	63	76
EJ Index for NATA* Respiratory Hazard Index	62	58	71
EJ Index for Traffic Proximity and Volume	57	47	61
EJ Index for Lead Paint Indicator	70	69	74
EJ Index for Superfund Proximity	57	51	64
EJ Index for RMP Proximity	73	66	77
EJ Index for Hazardous Waste Proximity	71	69	71
EJ Index for Wastewater Discharge Indicator	84	80	88



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

2 miles Ring Centered at 30.073515,-90.862445, LOUISIANA, EPA Region 6

Approximate Population: 394

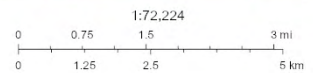
Input Area (sq. miles): 12.56

Nucor



January 31, 2022

✚ Nucor



Earthstar Geographics

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	1

EJSCREEN Report (Version 2020)



2 miles Ring Centered at 30.073515,-90.862445, LOUISIANA, EPA Region 6

Approximate Population: 394

Input Area (sq. miles): 12.56

Nucor

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.96	8.91	65	8.95	35	8.55	63
Ozone (ppb)	34.6	36.2	12	41.8	7	42.9	9
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.341	0.455	44	0.401	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	72	51	91	36	95-100th	32	95-100th
NATA* Respiratory Hazard Index	0.63	0.61	72	0.45	95-100th	0.44	80-90th
Traffic Proximity and Volume (daily traffic count/distance to road)	11	330	18	400	12	750	11
Lead Paint Indicator (% Pre-1960 Housing)	0.25	0.21	73	0.17	77	0.28	58
Superfund Proximity (site count/km distance)	0.021	0.086	22	0.081	28	0.13	18
RMP Proximity (facility count/km distance)	1.2	0.9	75	0.82	79	0.74	81
Hazardous Waste Proximity (facility count/km distance)	1.4	1.5	60	0.99	76	5	57
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.01	1.7	80	9.5	78	9.4	79
Demographic Indicators							
Demographic Index	50%	40%	69	44%	61	36%	74
People of Color Population	64%	41%	75	52%	63	39%	75
Low Income Population	36%	39%	47	37%	52	33%	61
Linguistically Isolated Population	0%	2%	62	6%	36	4%	45
Population With Less Than High School Education	22%	15%	76	16%	72	13%	82
Population Under 5 years of age	6%	7%	48	7%	42	6%	51
Population over 64 years of age	13%	15%	42	13%	54	15%	43

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

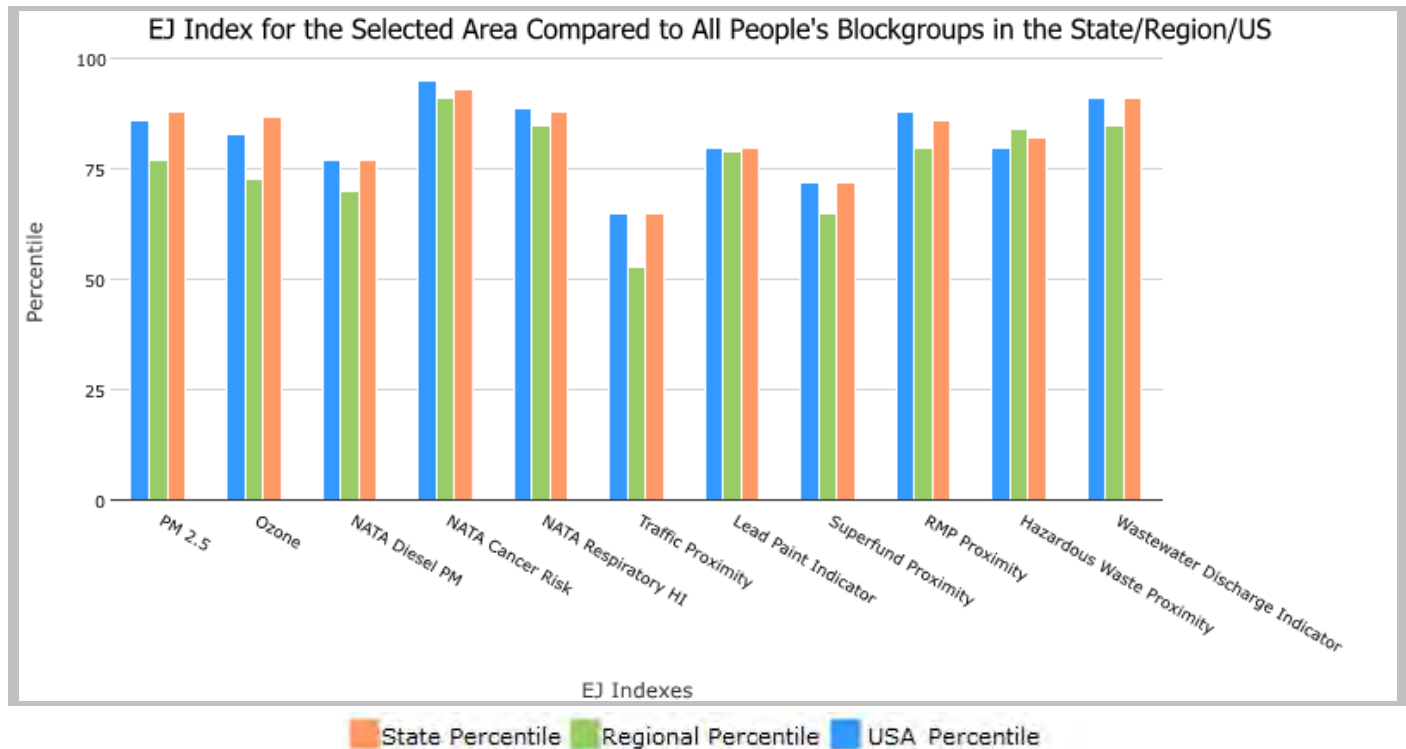
3 miles Ring Centered at 30.073515,-90.862449, LOUISIANA, EPA Region 6

Approximate Population: 2,207

Input Area (sq. miles): 28.27

Nucor

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	88	77	86
EJ Index for Ozone	87	73	83
EJ Index for NATA* Diesel PM	77	70	77
EJ Index for NATA* Air Toxics Cancer Risk	93	91	95
EJ Index for NATA* Respiratory Hazard Index	88	85	89
EJ Index for Traffic Proximity and Volume	65	53	65
EJ Index for Lead Paint Indicator	80	79	80
EJ Index for Superfund Proximity	72	65	72
EJ Index for RMP Proximity	86	80	88
EJ Index for Hazardous Waste Proximity	82	84	80
EJ Index for Wastewater Discharge Indicator	91	85	91



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

3 miles Ring Centered at 30.073515,-90.862449, LOUISIANA, EPA Region 6

Approximate Population: 2,207

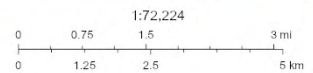
Input Area (sq. miles): 28.27

Nucor



January 31, 2022

- ✦ Nucor
- ✦ Search Result (point)



Earthstar Geographics

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	2

EJSCREEN Report (Version 2020)



3 miles Ring Centered at 30.073515,-90.862449, LOUISIANA, EPA Region 6

Approximate Population: 2,207

Input Area (sq. miles): 28.27

Nucor

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.9	8.91	61	8.95	32	8.55	61
Ozone (ppb)	34.2	36.2	6	41.8	6	42.9	8
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.293	0.455	37	0.401	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	67	51	88	36	95-100th	32	95-100th
NATA* Respiratory Hazard Index	0.61	0.61	67	0.45	90-95th	0.44	80-90th
Traffic Proximity and Volume (daily traffic count/distance to road)	18	330	22	400	16	750	15
Lead Paint Indicator (% Pre-1960 Housing)	0.17	0.21	61	0.17	69	0.28	49
Superfund Proximity (site count/km distance)	0.02	0.086	20	0.081	27	0.13	17
RMP Proximity (facility count/km distance)	1	0.9	70	0.82	74	0.74	77
Hazardous Waste Proximity (facility count/km distance)	1.3	1.5	57	0.99	73	5	55
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0079	1.7	76	9.5	76	9.4	78
Demographic Indicators							
Demographic Index	68%	40%	83	44%	81	36%	88
People of Color Population	86%	41%	86	52%	81	39%	87
Low Income Population	50%	39%	69	37%	72	33%	79
Linguistically Isolated Population	0%	2%	62	6%	36	4%	45
Population With Less Than High School Education	23%	15%	77	16%	73	13%	83
Population Under 5 years of age	4%	7%	31	7%	26	6%	33
Population over 64 years of age	12%	15%	42	13%	53	15%	43

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.