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Chuck Carr Brown, Secretary
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Dear Administrator McQueen and Secretary Brown,

The Environmental Protection Agency confirmed in December 2016 that ethylene oxide is a human carcinogen that can result in an elevated risk of lymphoid and breast cancers. In 2018 the EPA provided further information with the release of its most recent National Air Toxic Assessment that identified areas across the U.S. where exposure to ethylene oxide emissions contributes to elevated cancer risk for certain communities.

Communities in Louisiana adjacent to chemical facilities [have long identified connections between toxic emissions and increased cancer rates](#). The EPA's 2016 and 2018 reports are critical sources of information for directly affected residents in Louisiana's industrial corridor who for decades have been exposed to toxic emissions and struggled to improve air quality. But while EPA has identified five Louisiana facilities as being among its list of 25 high priority facilities necessitating community outreach, EPA has left these Louisiana communities in the dark about their risks. EPA must communicate its findings to Louisiana's impacted residents so that they can learn about the health risks associated with living near these ethylene oxide-emitting plants and any actions that EPA or the state are taking to address those risks.

The EPA's mission statement declares its responsibility to educate communities about environmental risk, specifying that EPA has a commitment to ensure "all parts of society have access to accurate information sufficient to effectively participate in managing human health and environmental risks." Yet last week the EPA's Office of Inspector General released a report detailing the EPA's failure to engage many affected communities about their increased cancer risk from ethylene oxide. Indeed, EPA (or the relevant state agency) has failed to meet with 16 of the communities located near the 25 ethylene oxide-emitting facilities that EPA identified as high priority for outreach. Neither the EPA nor state environmental agencies have conducted any community outreach whatsoever in states covered by EPA Region 6, even though 10 of the 25 ethylene-emitting facilities on EPA's list are in Region 6 states (Louisiana, Texas, New Mexico).

Five of the 25 ethylene oxide-emitting facilities on EPA's list are located in Louisiana, yet neither the EPA nor the Louisiana Department of Environmental Quality (LDEQ) has held a single meeting in any of the Louisiana communities impacted by these facilities., which are majority black. And according to the Inspector General's report, neither EPA nor LDEQ has any plans to conduct any outreach to these communities, even though outreach around EPA's other high priority facilities outside of Region 6 began more than a year and a half ago.

It is also important to acknowledge that there are three more plants in Louisiana that emit significant amounts of ethylene oxide that are not on EPA's priority list . These plants are the BASF and Shell chemical plants in Geismar, as well as the Dow Chemical plant in Plaquemine. Using emission averages from EPA's 2014 and 2017 National Emissions Inventory, we can see that the BASF chemical plant emits an average of 14,700 pounds of ethylene oxide annually, almost three times the annual emissions of the Sterigenics plant in Willowbrook, Illinois, where EPA or state regulators conducted community outreach in August 2018. Indeed, public outcry was so strong having learned about the risks posed by the ethylene oxide emissions at the Sterigenics plant that it was shut down. For additional perspective, the Shell chemical plant releases 9,541 pounds of ethylene oxide, almost double the emissions of Willowbrook's Sterigenics plant, and Dow Chemical releases 3,601.6 pounds of ethylene oxide annually. EPA must also reach out to the communities around these Louisiana plants and inform them about their health risks associated with ethylene oxide emissions.

Not only have the EPA and state agencies totally neglected their duty to educate Louisianans about ethylene oxide related cancer risk, LDEQ has continued to issue air

permits to allow further dangerous emissions of this chemical, without evaluating the costs to human health. The plastics corporation Formosa intends to build a \$9.4 billion petrochemical complex comprising 14 separate plants in St. James Parish, Louisiana. This parish sits along the Mississippi River in the state's industrial corridor, [a region historically known as Cancer Alley](#) because it contains seven of the ten census tracts with the highest rates of cancer in the nation. The LDEQ recently issued air permits to Formosa that would allow its planned facility to release 15,400 pounds of ethylene oxide annually, more than three times the emissions of the Sterigenics plant in Willowbrook. If built, Formosa's ethylene oxide emitting plants would be among the largest sources of the chemical in the nation. The complex would sit adjacent to predominantly African American communities and just one mile from an elementary school where the student population is 99 percent black.

By choosing not to inform at-risk communities of the dangers associated with ethylene oxide, the EPA is complicit in allowing Louisiana residents to be unknowingly exposed to this potent carcinogen. By choosing to issue air permits to allow for the construction of the Formosa complex, the LDEQ is authorizing a new major source of this known carcinogen in a region of our state where residents are already among the nation's most at-risk population for developing cancer.

The EPA's Inspector General report was released during a global health crisis whose impacts are particularly acute in Louisiana. [New scientific research has shown](#) that air pollution amplifies the dangers of the COVID-19 virus, making residents of Louisiana's industrial corridor especially vulnerable to the effects of the disease. Louisiana has become an epicenter of COVID-19 and [70 percent of those dying are black](#). At this time, it is more critical than ever that the EPA meet its core obligations to both strengthen national emissions standards for chemical plants¹ and share crucial information with affected communities. The LDEQ must stop prioritizing industry profits over the lives and wellbeing of the people of this state. LDEQ has a duty under the state constitution to evaluate health impacts before issuing any permits that allow deadly carcinogens, particularly those in communities that already face hugely disproportionate rates of environmental pollution and cancer.

Given that EPA Region 6 appears to have no plan to inform the public of the health risks associated with continuous exposure to ethylene oxide emissions and is relying on state

¹ Environmental groups submitted [comments](#) and requested a [hearing](#) on EPA's proposed rule—National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing Residual Risk and Technology Review ("proposed MON rule"), asking for fence-line monitoring and immediate protection.

agencies to take the lead, Healthy Gulf and allied Louisiana organizations are requesting information about LDEQ's plans to conduct direct outreach to these Louisiana communities near the ethylene oxide-emitting facilities on EPA's priority list. [Similar to the request of our Texas allies in Air Alliance Houston](#), we would like answers to the following questions:

- 1) What action will LDEQ take to inform the public about increased risk of cancer from ethylene oxide, and when?
- 2) Is LDEQ planning to monitor ethylene oxide emissions in impacted communities?
- 3) What steps does LDEQ plan to take to require ethylene oxide reductions at the facilities that contribute to elevated cancer risk in the neighboring communities?
- 4) What action will EPA Region 6 take if LDEQ fails to conduct appropriate community outreach in the communities near the ethylene oxide-emitting facilities on EPA's priority list?

We are eager to begin a conversation with EPA Region 6 and Louisiana state agencies about the steps they will take to address elevated cancer risks associated with ethylene oxide emissions in Louisiana's industrial corridor.

Sincerely,
Michael Esealuka - Louisiana Organizer, Healthy Gulf

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Center for Biological Diversity
Coalition Against Death Alley
Concerned Citizens of St. John the Baptist Parish
Earthworks
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Justice & Beyond
RISE St. James
Louisiana Bucket Brigade
No Waste Louisiana
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