UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

March 14, 2023 Sent by email only

Hackberry Carbon Sequestration, LLC
501 Louisiana Ave.,
Baton Rouge, LA 70802

RE: Underground Injection Control (UIC) Permit Application R06-LA-0007
Class VI Pre-Construction Permit Application
Environmental Justice Considerations

Dear Mr. Gilbert:

EPA recommends additional elaboration on environmental justice considerations for this project. Following these recommendations at this stage in the project will build a stronger public participation communication plan, potentially reduce the number of comments during the public hearing process and ensure that all people residing in the project vicinity receive fair treatment and meaningful involvement regardless of race, color, national origin or income.

The EPA EJ Screen tool utilizes 12 indexes that combine demographic factors with a single environmental factor. Environmental and supplemental factors include Particulate Matter 2.5, Ozone, Diesel Particulate Matter, Air, Toxics Cancer Risk, Air Toxics Respiratory Hazard Index, Traffic Proximity, Lead Paint, RMP Facility Proximity, Hazardous Waste Proximity, Superfund Proximity, Underground Storage Tanks and Wastewater Discharge. EJ Screen analyses identify census blocks in which environmental hazards are concentrated amongst people of color, low income and/or unemployed populations, populations with limited English proficiency, popultions with low percentages of high school and above education and low life expectancy. EPA Region 6 strongly encourages that the applicant discuss the intersection of site specific environmental and demographic data.

This section should also mention potential construction and operational impacts on the populations in the Hackberry vicinity, including short-term concerns such as air quality, transportation, noise levels, and other potential public or private nuisances. You may also want to acknowledge the cumulative concentration of heavy industry in the area, the significant impact hurricanes have had on the community, and Hackberry's proximity to the much denser Lake Charles metro area.

Additionally, the applicant should indicate whether any guidance documents beyond the EPA's *Promising Practices for EJ Methodologies in NEPA Reviews* (2016) were used in the development of this application. EPA has a resource specific to Class VI projects, including example analyses, here: https://www.epa.gov/sites/default/files/2015-07/documents/epa816r11002.pdf

Please review the above comments. If you have any questions, please contact Brody Friesenhahn at (214) 665-7259.

Sincerely,

Johnson, Ken-E Digitally signed by Johnson, Ken-E
Date: 2023.03.14 21:52:44 -05'00'

Ken Johnson, PE
Ground Water / UIC Section Chief