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TULANE ENVIRONMENTAL LAW CLINIC

September 26, 2023

By email to: linda.hubbell@stjamesparishla.gov

St. James Parish Council

RE: Supplement to Appeal of July 31, 2023, Commission Approval of Item # 23-25, Koch Methanol St. James, LLC, Land Use Application for Automation and Optimization Project

Dear Members of the St. James Parish Council:

On behalf of Ms. Beverly Alexander, RISE St. James, Inclusive Louisiana, and the Mt. Triumph Baptist Church (collectively, “Residents”), we provide this supplement to our August 30, 2023, appeal of the July 31, 2023, St. James Parish Planning Commission (“Commission”) approval of Koch Methanol St. James, LLC’s (“Koch Methanol’s”) proposal to expand operations at its methanol production facility (“chemical plant” or “facility”) to increase its methanol production rate and install a pipeline to transport oxygen to the facility (“project” or “proposal”). The appeal will be heard on August 27, 2023, and we offer additional information for the Parish’s consideration.

We also request through this supplement that the Parish set Koch Methanol’s ITEP application for this Proposal on the September 27, 2023, agenda along with this appeal. The Council should exercise the authority for which local governments fought hard, i.e., to have a say in whether the ITEP exemption is approved, taking millions of tax dollars from Parish coffers and, ultimately, from Parish residents. The Council should take an active role in considering ITEP applications, as opposed to allowing automatic approval, especially for facilities like Koch Methanol that have failed to deliver promised jobs to St. James Parish. Setting the ITEP exemption on the agenda also allows the public to have a say in whether tax dollars that would benefit them should be sacrificed for an industrial proposal that will bring only two permanent jobs and provide little in the way of economic benefits, while adding hundreds of additional tons per year of harmful air pollutants.

A. New information casts further doubt on the economic benefits of Koch Methanol’s project.

Koch Methanol has promised that this project would create two new jobs, but has provided no information about the *net* change in jobs. This information is important because the project would apparently automate certain processes at the St. James facility, potentially eliminating the need for existing jobs. There is only one job opening specific to the St. James facility currently advertised on Koch Methanol’s website, and it appears to be one of the two

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jobs associated with the proposed project (see attached Exhibit A). According to Koch Methanol, this position, a Senior Process Engineer, “will help guide the **automation** and optimization process.” (Emphasis added.). Koch Methanol has apparently rebranded the project in its communication with the Parish, avoiding any reference to—and questions about—its plans to automate the St. James facility.

Failure to retain jobs might explain why Koch Methanol’s St. James facility has less than half of the employees that would be expected based on previous ITEP applications. Specifically, Koch Methanol only has 113 employees, whereas it promised a total of 276 jobs in its ITEP applications.¹ The Parish itself obtained Koch Methanol’s job numbers (and those for other major industrial employers) in a survey, the results of which are attached as Exhibit B.² Based on this survey, and information obtained from Louisiana Economic Development, Koch Methanol is the most egregious example of “ghost jobs” (i.e., promised jobs that never materialize) in St. James Parish. Even if Koch Methanol delivers on its latest promise, a meager two jobs, the St. James facility has a net deficit of 161 jobs.

In information submitted to LDEQ, Koch Methanol admits that about 75% of its employees reside *outside* St. James Parish.³ This admission means that Koch Methanol employees only about 40 residents of St. James Parish. Based on this rate of hiring locally, it is unlikely that either or the two jobs for the Automation and Optimization Project would go to a St. James Parish resident.

Residents’ appeal noted that Koch Methanol’s request for an industrial tax exemption was approved by Louisiana Economic Development. Unless the Parish objects, this new exemption would drastically decrease the tax revenue that St. James Parish would receive from Koch Methanol’s proposed expansion project. A closer look at what this means for the Parish further demonstrates that the Parish, and its residents, are getting a bad deal.

Attached as Exhibit C is a more detailed breakdown of Koch Methanol’s tax exemption, prepared for Residents by Together Louisiana. It reflects that, in exchange for only **two** full time jobs, the Parish would sacrifice a whopping \$7,382,810 in taxes over the 10 years of Koch’s

¹ See Table 3 of the Appeal.

² Exhibit B was obtained by Public Records Request to the Parish.

³ Koch Methanol Optimization Project Public Hearing Package, LDEQ EDMS Document No. 13989512, at p. 116. Available at <https://edms.deq.louisiana.gov/app/doc/view?doc=13989512&ob=yes&child=yes>.

exemption.⁴ This equates to \$3,691,405 million per job.⁵ The biggest percent of the taxes—41%—go to schools, thus it is the children who suffer most from this 80% loss.

Though Koch Methanol represented in its PowerPoint that it has a “continued” tax contribution of \$1.1 million per year, it is clear now from the ITEP information in Exhibit C that this is not the figure that applies to its Automation and Optimization Project—the matter currently before the Council. For that project, and the large increases in air pollution it will bring, Koch Methanol would pay only, on average, \$184,570 per year in taxes to the Parish.⁶ This is in exchange for 246.81 tons per year of harmful criteria air pollutants that the project would add to the air that St. James Parish residents—particularly those in the 5th District—breathe.

Residents also now believe that the Parish has not yet exercised its prerogative to deny or approve Koch Methanol’s ITEP exemption for this project. The Parish should include that matter on the September 27, 2023, agenda (which would still be timely), and decide the ITEP exemption when it hears this appeal. Koch Methanol owes the Council, and the public, answers as to why it only has 113 employees when it promised 276 jobs in its ITEP applications.⁷ This mismatch calls into question all of Koch Methanol’s promises about jobs, thus if the Parish is to effectively weigh the true job benefits it would be getting in exchange for significantly increasing the pollution burden on its residents, it must demand more information from Koch Methanol. The Parish owes it to its residents to exercise the valuable option it has to vote on Koch Methanol’s Automation and Optimization Project tax exemption, given that the dollars it is giving away—affirmatively or by inaction—would go to essential services like education and public safety.

B. Koch Methanol’s Proposed Project Would Bring the Parish Closer to Nonattainment for NO_x.

The Parish Council should consider that Koch Methanol’s Automation and Optimization Project may push St. James Parish into nonattainment for nitrogen dioxide (NO₂). A designation

⁴ The detailed numbers in Exhibit C reflect more accurate figures of the tax relief and burden from this project than the \$1,261,072.92 annual exemption figure Residents included in their Appeal. That figure reflected the exemption for the first year only, and added a \$519,406.52 exemption that the Board of Commerce and Industry recently granted to Koch Methanol but which covered a 2021-2022 project. That project produced zero permanent jobs. *See* Ex. 3 to Appeal at row 2, column X. It promised only 10 construction jobs. *Id.* at column AB.

⁵ While local authorities and the Board of Commerce and Industry have the ability to deny a 5-year extension at year five of the exemption, it is extremely rare—if not unheard of—for that to happen. We are unaware of an instance of St. James Parish denying the five-year extension during the period it has had the authority to do so. Thus, essentially, the five-year ITEP exemption is a ten-year ITEP exemption.

⁶ *See* Exhibit C, average of year 1-10 figures with ITEP approved.

⁷ *See* Table 3 of the Appeal.

of nonattainment means that a certain pollutant occurs at high levels in the air, above the corresponding National Ambient Air Quality Standard (NAAQS or “air quality standard.”).

Nonattainment in St. James Parish would have serious repercussions, potentially including expensive upgrades of existing facilities and prohibitive permitting requirements for new industrial projects. Three independent analyses by industrial companies have found evidence that St. James Parish is near or above the nonattainment threshold for NO_x. This includes an analysis by Koch Methanol itself, submitted to LDEQ for this Automation and Optimization Project, which predicted an hourly NO₂ design value within only 3% of the NAAQS. (A “design value” is the statistic that is compared against a NAAQS.) Specifically, the predicted design value was 182.4 µg/m³, and the NAAQS is 188 µg/m³. *Id.* In modeling submitted to LDEQ in July 2018, Formosa Plastics calculated an hourly NO₂ design value of 422 µg/m³ for its proposed St. James facility, which is more than *double* the NAAQS.⁸ In modeling submitted to LDEQ in April 2019, Nucor calculated the hourly NO₂ design value to be a whopping 1,263 µg/m³.⁹ While NO₂ levels are expected to vary across St. James Parish, a NAAQS violation in any part of the parish will have consequences for the entire area. Koch Methanol’s Automation and Optimization Project would increase permitted emissions of NO₂, thereby increasing the likelihood nonattainment for NO₂. *See* 42 U.S.C. § 7475(a). The requested emissions increase is compounded by Koch Methanol’s history of unpermitted pollution (see argument below).

Though Residents maintain the need for a moratorium on industrial expansion, from the Parish’s perspective, approval of the Koch Methanol project under these permit conditions could prevent future development of the area, development that could have a greater public benefit than two direct jobs and a small fraction of tax dollars.

C. Koch Methanol cannot mask the impacts of its project by characterizing its PSD review as voluntary and representing its technology as the best available.

Koch Methanol operates the Koch Methanol Plant and adjacent Koch Methanol Terminal, collectively referred to as the “KMe Facility.”¹⁰ According to the LDEQ, the KMe Facility constitutes a single major stationary source under the Part 70 Operating Permits Program. *Id.* For the expansion projects that are the subject of this appeal, Koch Methanol applied for a Part 70 Air Operating Significant Permit Modification and Initial Prevention of

⁸ FGLA Air Dispersion Modeling Report, July 2018. LDEQ EDMS Doc # 11246153.

⁹ Nucor Steel Title V Air Permit 3086-V9, June 2020. LDEQ EDMS Doc # 12252342. *See also* corresponding May 2020 permit application. LDEQ EDMS Doc # 12175457, page 36 of 107.

¹⁰ Louisiana Department of Environmental Quality, Public Notice, Air Permit Briefing Sheet, Document ID 13920052, EDMS (July 31, 2023) at 5, available at <https://edms.deq.louisiana.gov/app/doc/view?doc=13920052&ob=yes&child=yes> (hereinafter Air Permit Briefing Sheet).

Significant Deterioration (“PSD”) Permit. *Id.* at 1. Koch Methanol requested to incorporate all permitted KMe Terminal sources from its existing Title V permit into a single Title V permit for the KMe Facility. *Id.* at 5. Koch Methanol represented PSD review to the Planning Commission as voluntary, apparently intending to convey a protective approach in developing its facility.¹¹ But this characterization belies the magnitude of Koch Methanol’s proposed emissions increases and likely misrepresents the purpose of Koch Methanol’s decision to engage in PSD review at this stage in development.

First, as a preliminary matter, the emissions increases created by this project are substantial: as noted in the Appeal, approval of this permit transforms the facility from a minor source into a major source of pollution under the Clean Air Act.¹² That Koch Methanol performed PSD review does not change this fact. Nor does Koch Methanol’s voluntary engagement in PSD review in and of itself suggest that the environmental impacts of the project are any less significant relative to the public benefits for the purposes of reviewing Koch Methanol’s land use application. The emission limit increases Koch Methanol seeks in its LDEQ permit application together will result in increases to the KMe Facility’s potential to emit (PTE) of greater than 100 tons/year for nitrogen oxides, carbon monoxide, and volatile organic compounds. *Id.* at 16. Thus, with this permitting action, the existing stationary source will become a PSD major stationary source. *Id.*

Second, Koch Methanol’s characterization of PSD review as “voluntary” misrepresents the likely purpose of Koch Methanol’s decision to engage in PSD Review because it omits the common reasons a facility like Koch Methanol would engage in PSD Review at this stage in development. The Clean Air Act Handbook states that operators may choose to request PSD review for efficiency purposes if they expect future expansion.¹³ This may especially be true in place like St. James and for facilities like Koch Methanol, where the area is subject to industrial zoning and there will likely be other future industrial development. If there are expected new sources in the area around Koch Methanol, it may be harder for KMe to get a PSD permit for a major modification in the future. Further, “if an area currently in attainment is likely to be redesignated for nonattainment . . . it is likely to be less costly to undergo PSD review as a source located in an attainment area than nonattainment review as a source located in an area not satisfying the NAAQS requirements.”¹⁴ As noted earlier, industry modelling, including Koch Methanol’s, suggests that St. James Parish may be close to being in nonattainment for NO₂, so Koch Methanol may be anticipating a change in the Parish’s attainment designation.

Finally, in its September 22, 2023, revision to its land use application, Koch Methanol represents that its pollution emissions will be controlled by the Best Available Control

¹¹ See KMe PowerPoint presentation at Slide 16, attached to Appeal as Exhibit 5.

¹² LDEQ Public Notice, Air Permit Briefing Sheet, at 16.

¹³ Julie R. Domike & Alec C. Zacaroli, 3 *Clean Air Act Handbook*, 145 (2011).

¹⁴ *Id.* at 146.

Technology, or BACT. However, comments to LDEQ from RISE St. James and Beverly Alexander, prepared by the Environmental Integrity Project, raise a number of issues with Koch Methanol's claim that it will employ the best technology as part of its permit.¹⁵ Notably, the issues raised in these comments relate to Koch Methanol's NOx emissions and its repeated use of startup, shutdown, and malfunction operations to exceed permit limits, the latter of which is discussed below.

D. Koch Methanol's history of seeking variances to exceed permit limits during startup, shutdown, and malfunction procedures results in environmental costs on the community.

The Council should be aware that Koch Methanol's emission impacts on the community are even greater than what is formally permitted because of the facility's frequent requests for variances related to Startup, Shutdown, and Malfunction procedures. Koch Methanol began operating its production facility in 2021, but within the span of two years the company has requested three variances from LDEQ to increase emissions outside of its permit limitations.¹⁶ Variances authorized by LDEQ act as exemptions and allow a company to temporarily operate, without penalty, in a manner that would otherwise violate its permit.

Since beginning operations in 2021, Koch Methanol has sought variances to exceed its permitted emission limits during shutdown and start-up events for Nitrogen Oxides, Carbon Monoxide, and Particulate Matter.¹⁷ These violations were approved for extended periods of time, ranging from two to twelve months.¹⁸ More specifically, Koch Methanol's permit exceedances for Nitrogen Oxide emissions, for which it obtained a variance, resulted in the company exceeding those permit limitations by more than 13 tons.¹⁹ For Carbon Monoxide, Koch Methanol has exceeded its permit by almost 49 tons within the last two years.²⁰ With increased production, the Automation and Optimization Project may contribute to more emissions exceedances. These emissions exceedances would only worsen health impacts to the community, tipping the scale even further towards nonattainment and easily outweighing any meager economic benefits of the Automation and Expansion Project. Although authorized by

¹⁵ LDEQ EDMS Doc. ID No. 13989126, available at

<https://edms.deq.louisiana.gov/app/doc/view?doc=13989126>.

¹⁶ LDEQ EDMS Document ID No. 13595272 (Dec. 16, 2022), available at

<https://edms.deq.louisiana.gov/app/doc/view?doc=13595272>; LDEQ EDMS Document ID No. 13601772 (Dec. 27, 2022), available at

<https://edms.deq.louisiana.gov/app/doc/view?doc=13601772>;

LDEQ EDMS Document ID No. 12947370 (Oct. 21, 2021), available at

<https://edms.deq.louisiana.gov/app/doc/view?doc=12947370>.

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ *Id.*

LDEQ, these variances were not subject to public notice and comment procedure, which allowed LDEQ and Koch Methanol to bypass the permit restrictions and increase harmful pollutants during shutdown and start-up events without public participation or notice to the Parish.

Koch Methanol has failed to provide the Council with any information pertaining to its significant startup, shutdown, and malfunction permit exceedances. Koch Methanol further neglected to inform the Council of any corresponding environmental harms and human health risks associated with these pollutant increases. Regardless of whether these excess emissions are allowed by LDEQ, Parish residents will suffer environmental consequences due to startup, shutdown, and malfunction emissions increases.²¹ Without considering this information, the Council cannot accurately assess the environmental costs and health impacts to the community caused by these pollution increases.

CONCLUSION

Koch Methanol's job promises are empty. It has not created the jobs it promised to create when it sought and received other industrial tax exemptions, and 75% of the jobs it did create went to residents of other parishes or other states. The only thing the parish can rely on with this proposal is a large increase in harmful air pollutants that will be emitted into St. James Parish air for the life of this operation. The benefits of the project are nowhere near commensurate with the costs; the Parish should grant this appeal and deny Koch Methanol's land use application.

Respectfully submitted on September 26, 2023,

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Tulane Environmental Law Clinic
*Counsel for Ms. Beverly Alexander*²²

/s/ Lisa Jordan

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²¹ Indeed, these LDEQ variances are likely illegal under the Clean Air Act (CAA). In a recent notice, EPA proposes to find Louisiana's provisions which seek to create exemptions for excess emissions during startups and shutdowns and thus fail to identify them as violations, "are inconsistent with the fundamental requirements of the CAA with respect to emission limitations." State Implementation Plans: Findings of Substantial Inadequacy and SIP Calls To Amend Provisions Applying to Excess Emissions During Periods of Startup, Shutdown, and Malfunction, 88 Fed. Reg. 11842, 11861 (proposed Feb. 24, 2023) (to be codified at 40 C.F.R. pt. 52). In reaching its conclusion that the current provisions are deficient, EPA notes that LDEQ has provided multiple variances in recent years to allow for pollution increases during times of startups, shutdowns and malfunctions. *Id.*

²² Ms. Alexander's consent to student attorney representation is attached as Exhibit D.

Appeal of Land Use Authorization to Koch Methanol St. James, LLC

September 26, 2023

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Koch Methanol

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Engineering

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143249

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site. This role will be responsible for oversight of process design & optimization to ensure the plant is running in a stable & reliable fashion. The individual will have opportunities to 'think outside of the box' to create value by driving improvements to existing workflows & processes. The role will help to guide the automation & optimization process to ensure the facility is best-in-class in plant technology & operation. The individual will evaluate & implement process changes to increase plant efficiency, reliability & rate. This includes involvement in upfront engineering studies, detailed engineering reviews & oversight during start-up.

Our Team

At Koch Methanol, we strive to be the partner of choice to our customers, employees, our customers & our community. We are looking for individuals who are contribution motivated, driven by the ability to add value to existing systems & processes. We want employees with a creative, entrepreneurial spirit to challenge the status-quo & drive transformational change.

What You Will Do

- Generate & review scopes of work to improve the facility's comparative advantage
- Review day-to-day operation of the facility to ensure the plant is fully optimize
- Work with the cross-functional site teams to execute ideas & site improvements
- Support plant operations team in troubleshooting to help resolve issues
- Create a learning culture where ideas are welcomed, challenged & executed to drive continuous improvement
- Provide subject matter expert (SME) oversight to changes proposed to the production process
- Support & develop the process & controls team by bringing experience & creative solutions to plant troubleshooting
- Support project execution teams in developing scopes of work that create value for the site

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At Koch companies, we are entrepreneurs. This means we openly challenge the status quo, find new ways to create value and get rewarded for our individual contributions. Any compensation range provided for a role is an estimate determined by available market data. The actual amount may be higher or lower than the range provided considering each candidate's knowledge, skills, abilities, and geographic location. If you have questions, please speak to your recruiter about the flexibility and detail of our compensation philosophy.

Hiring Philosophy

All Koch companies value diversity of thought, perspectives, aptitudes, experiences, and backgrounds. We are Military Ready and Second Chance employers. Learn more about our hiring philosophy [here](#).

Who We Are

As a Koch Ag & Energy Solutions company, Koch Methanol produces and supplies the methanol that has become an essential part of our daily lives –and is a key ingredient in products like clothing, cosmetics, paints, plywood and adhesives –in addition to fueling ships, buses, trucks, fuel cells and cooking stoves. Our goal is to be the preferred supplier of methanol to our customers who depend on us for our reliability and quality of service.

At Koch, employees are empowered to do what they do best to make life better. Learn how our [business philosophy](#) helps employees unleash their potential while creating value for themselves and the company.

Our Benefits

Our goal is for each employee, and their families, to live fulfilling and healthy lives. We provide essential resources and support to build and maintain physical, financial, and emotional strength – focusing on overall wellbeing so you can focus on what matters most. Our benefits plan includes – medical, dental, vision, flexible spending and health savings






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St. James Parish
Convent, Louisiana
Principal Employers
Most Recent Two Years
(Unaudited)

Employer	Type of Business	Rank	2022	
			No. of Employees	Est. Percent of Total Workforce
St. James Parish Schl Brd K-12 Public Education		1	637	9.25%
Atalco Alumina	Alumina Manufacturer	2	480	6.97%
Mosaic Fertilizer, LLP	Fertilizer Production	3	346	5.03%
St. James Parish Council	Parish Government	4	310	4.50%
St James Hospital	Hospital	5	264	3.83%
Nucor Steel La	Steel Production	6	251	3.65%
Louisiana Sugar Refining	Sugar Refining	7	194	2.82%
Zen-Noh Grain Corp.	Grain Processor	8	189	2.75%
Associated Terminals	Grain elevator	9	157	2.28%
Frisdard's Trucking	Trucking Company	10	140	2.03%
American Styrenics	Chemical Refinery	11	129	1.87%
Oxy Chem	Chemical Refinery	12	113	1.64%
Koch Methanol	Methanol Manufacturer	13	113	1.64%

Source: Survey done by St James Parish Government

2021

Rank	No. of Employees	Est. Percent of Total Workforce
1	624	9.06%
2	480	6.97%
3	328	4.76%
4	286	4.15%
5	270	3.92%
6	255	3.70%
7	190	2.76%
8	190	2.76%
9	150	2.18%
10	123	1.79%
11	115	1.67%
12	106	1.54%

Total investment	\$56,500,000
Total taxes paid if ITEP is denied	\$9,228,512
Total taxes paid if ITEP is approved	\$1,845,702
Foregone revenue if ITEP is approved	-\$7,382,810
Schools	-\$3,056,483
Law Enforcement	-\$1,808,788
Parish	-\$2,517,538

Schools	41%
Law Enforcement	25%
Parish	34%

Annual Property Tax Burden

Year	ITEP Denied by all taxing bodies	ITEP Approved by all taxing bodies
1	\$923,775	\$184,755
2	\$859,111	\$171,822
3	\$960,726	\$192,145
4	\$1,016,153	\$203,231
5	\$979,202	\$195,840
6	\$960,726	\$192,145
7	\$951,488	\$190,298
8	\$914,537	\$182,907
9	\$859,111	\$171,822
10	\$803,684	\$160,737
Total	\$9,228,512	\$1,845,702
Total jobs	2	
Subsidy per job	\$3,691,405	

CLIENT'S WRITTEN CONSENT FOR STUDENT ATTORNEY APPEARANCE

I hereby grant my consent for student attorneys from the Tulane Environmental Law Clinic to appear on my behalf in any matter in which the Tulane Environmental Law Clinic represents me, whether in court or before an administrative tribunal.

Dated: 02-21-2020

Signed: Beverly M. Alexander

Printed Name: Beverly M. Alexander