



August 21, 2026

Public Participation Group
Louisiana Department of Environmental Quality
P.O. Box 4313, Baton Rouge, LA 70821-4313

Via email, deq.publicnotices@la.gov

Re: Public comment on Hyundai-POSCO steel mill Part 70, PSD, & EAS permitting

Agency Interest No. 248885
Permit No. 0180-00243-V0 and PSD-LA-872
Activity No. PER20250001 and PER20250002

To the LDEQ Public Participation Group:

Thank you for the opportunity to comment on permit applications 0180-00243-V0 and PSD-LA-872 associated with Hyundai-POSCO Louisiana Steel LLC (“HPLS”), formerly referred to in the permit record as Hyundai Steel Louisiana LLC (“HSLA”).

Jobs to Move America (“JMA”) is a national 501(c)(3) not-for-profit organization with a presence in Louisiana that aims to ensure that the billions of public dollars spent on U.S. public infrastructure and clean energy manufacturing create better results for American communities: good jobs, cleaner equipment, more opportunity for low-income and other disadvantaged communities, and greater transparency in the award of contracts, tax credits, and subsidies by government institutions.

Consistent with its mission, JMA conducts independent research on public spending and the manufacturing sector, publishes reports of its findings, engages in policy advocacy, advises public agencies on procurement practices, and builds coalitions of workers and community members to ensure that public investments in manufacturing are benefiting communities.

We write to express concern that the HPLS project permit application does not adequately address potential environmental risks to workers and nearby communities. The application does not adequately consider alternatives to polluting processes or analyze climate, environmental,

California

Illinois

New York/New Jersey

Alabama

and occupational risks from plant construction and operations. As a result, the application may not meet the standards of the Clean Air Act or the Louisiana Public Trust Doctrine.

We are troubled that HPLS entirely removed its environmental justice analysis from the application. On May 27, 2026, an addendum to the application was submitted by HPLS that, among other changes, removed the environmental justice analysis from the application. The depth of analysis in the initial application was already insufficient but now even that is absent. That is especially concerning given the environmental hazards that residents in Ascension Parish have historically faced and the polluting emissions permit would allow.

In particular, the application removed an analysis that found that the area within 5km of the proposed site is in the 94th percentile in Louisiana and 96th percentile nationally for toxic releases to air, and that there are three churches within 5km of the proposed site.¹ It is unclear why this section was removed from the application entirely despite its high relevance to nearby communities and to the standards by which the application must be judged by LDEQ. HPLS should describe why the application was amended to remove that citation and why that information is deemed no longer relevant.

In addition, HPLS's initial application acknowledged that EJScreen was used to identify schools, hospitals, churches, and residences within 5km radius of the proposed facility, but the application did not disclose the underlying EJScreen/GIS data or the number of residences or residents located within that radius. That omission is especially concerning because the proposed site is located in Census Tract 309, which includes Modeste and parts of Donaldsonville, and has an estimated population of more than 4100 people and is approximately 73% Black, with a median household income of about \$29,000; and a poverty rate of 45%.^{2 3} Because a 5km radius may include portions of multiple census tracts and communities beyond Census Tract 309, HPLS should provide the actual EJScreen/GIS outputs used for its analysis. A community's history of being burdened by industrial pollution is highly relevant in assessing the public benefits of a project against its environmental impacts yet HPLS went so far as to remove the sparse analysis of those factors from the initial application. Areas near the proposed project have a documented

¹ Trinity Consultants (December 23, 2025). *Hyundai Steel Louisiana Ascension Parish Steel Mill Initial Title V and PSD Permit Application*. Section 4.1.92., Page 4-36.

² U.S. Census Bureau. *Selected Economic Characteristics. American Community Survey, ACS 5-Year Estimates Data Profiles*. Table DP03.

https://data.census.gov/table/ACSDP5Y2024.DP03?g=040XX00US22_1400000US22005030900

³ U.S. Census Bureau. *Poverty Status in the Past 12 Months. American Community Survey, ACS 5-Year Estimates Subject Tables*. Table S1701.

<https://data.census.gov/table/ACSST5Y2024.S1701?t=Official+Poverty+Measure&g=1400000US22005030900>

history of industrial pollution. The Geospatial Research, Analysis & Services Program classifies five census tracts in Ascension Parish as “Highly Environmentally Burdened” in their Environmental Justice Index, which measures the cumulative impact of environmental injustice – three of those five census tracts are in or adjacent to where the HPLS plant is proposed to be located.⁴ People in those areas face, among other burdens, high cancer risk from air toxics. LDEQ must consider the cumulative environmental burdens of granting the permit and HPLS must provide information necessary for LDEQ’s deliberations.

We believe the lack of an environmental justice analysis means that HPLS is unable to meet the standards of the Public Trust Doctrine. Without an environmental justice analysis, it is impossible to say that the project will not unduly increase environmental risks for those living, working, or worshipping near the proposed plant. LDEQ cannot determine whether the project balances the environmental, social, and economic costs of a project against its potential social and economic benefits without further analysis of the project’s environmental justice impacts.

HPLS should provide a sufficient environmental justice analysis so that LDEQ has a basis to judge whether the project meets its legal requirements. That analysis should include information on the potential negative environmental impact of the proposed project, existing environmental and public health burdens near the proposed plant, associated projects that could increase environmental burdens, and planned mitigation and control measures.⁵

The May 27 amendment to the application no longer includes HPLS’ commitment to reach net-zero greenhouse gas operations. In the initial application, HPLS committed to reaching net zero greenhouse operations by 2050 in line with the Louisiana Climate Action Plan. However, in their May 27 addendum, HPLS stripped out that commitment completely. That raises serious questions about HPLS’ commitment to reducing and eventually eliminating climate-altering pollution and HPLS’ seriousness in mitigating environmental damage. HPLS should describe why they are no longer willing to commit to net-zero operations.

HPLS has other emissions related deficiencies in their application like inadequate BACT analyses, missing details around carbon capture and storage plans, and inconsistencies in projecting CO₂ emissions.

⁴ Center for Disease Control Geospatial Research, Analysis & Services Program. (2024, November 3). *Ascension Parish Environmental Justice Index*.

https://ej.cdc.gov/documents/data/2024/countymaps/22_Louisiana/22005_Ascension_Parish_Louisiana.pdf

⁵ Sierra Club (2026, June 19). *Sierra Club comments on Hyundai air permit*.

<https://edms.deq.louisiana.gov/app/cache/15246835.pdf>

How HPLS plans to deploy carbon capture and storage (CCS) technology is critically important, yet details are missing. The application does not describe how or if the project will and transport and sequester scrubbed CO₂. Questions regarding what pipeline infrastructure will be needed, how the carbon will be sequestered, and if CCS will be fully active from the beginning of operations are unaddressed. HPLS has described using CO₂ scrubbing technology, yet has not described the essential component of how that CO₂ will be sequestered. Capturing CO₂ at the point of release will not reduce emissions if it is not then effectively sequestered. Further, if the CCS process is powered by fossil fuel energy or used for enhanced oil recovery the net emissions reductions will be greatly reduced. The lack of details on how CCS will be deployed call into question the overall CO₂ emissions figures presented in the application. There are also significant community and workplace safety concerns related to CO₂ transportation and storage.

Community members and workers need transparency around Hyundai's plans for CCS so that safety concerns around pipeline operations and storage can be addressed. Pipeline and well leaks and ruptures can present significant safety hazards and negate emissions controls. For example, a pipeline rupture in Satartia, Mississippi led to 46 people being treated in area hospitals and the evacuation of more than 300 residents.⁶ Yet, despite these risks, HPLS does not describe where CCS infrastructure will be placed or what, if any, control and safeguard measures will be utilized.

HPLS should provide details of how they plan to integrate CCS into operations and commit to not using captured CO₂ for enhanced oil recovery. As of now, there is no ability to assess HPLS' CCS plans efficacy in mitigating CO₂ emissions while being safe for workers and communities.

HPLS does not provide sufficient detail how it will source the substantial electric load necessary for operations, including the expected source of electricity, grid impacts, rate payer impacts, and related effects on nearby communities.

HPLS does not have an analysis of how they plan to reduce or mitigate environmental and occupational safety risks from heavy metal pollution. The application includes projected emissions of 362 lbs of mercury and 980 lbs of manganese per year, but does not adequately analyze how HPLS will limit worker and community exposure to those heavy metals.⁷ Mercury is a known hazard that can cause serious long-term cardiovascular and central nervous system

⁶ Associated Press. (2020, February 23). *Dozens treated, evacuated after pipe ruptures in Mississippi*. <https://apnews.com/general-news-24e50c057a8102b18247f1fad7837605>

⁷ Trinity Consultants (May 27, 2026). *HPLS Air Permit Application Updates - AI 248885*. Table 2-1., Page 2-7.

damage and manganese toxicity primarily targets the nervous system. HPLS should describe the controls, monitoring, work practices, and exposure-prevention measures it will use to reduce risks from mercury, manganese, and other heavy metals.

A facility using similar iron reducing technologies in Louisiana has been cited by the Louisiana Department of Environmental Quality (LDEQ) for air pollution, highlighting the need for detailed accounting of Hyundai's plans and consideration of control technologies that could eliminate or reduce pollution risks. In 2021, NUCOR Steel Louisiana entered a settlement with LDEQ resolving LDEQ citations related to potential release of NO_x pollutants in excess of requirements.⁸ HPLS needs to provide information on how they aim to prevent a similar incident.

The application does not provide sufficient site-specific details about HPLS's plans to respond to accidental releases or non-routine operations. As discussed in other comments, critical incidents at the site could endanger workers and nearby communities and HPLS needs to describe to LDEQ how they plan to keep workers safe, notify nearby communities, coordinate with first responders, and limit environmental damage.⁹

HPLS failed to analyze alternative technologies that could significantly reduce pollution and workplace and community safety hazards caused while also lowering costs. The lack of analysis of viable alternatives is a fundamental problem in the permit application. HPLS did not adequately consider achievable means of maximally reducing regulated pollutants under the required Best Available Control Act Technology (BACT) analysis because they failed to consider economically viable and environmentally superior electric alternatives for key production processes.

According to an analysis conducted by Dr. Elizabeth Boatman per the Sierra Club's comments on these permits, electrifying key processes could provide savings of \$2.7 million a month and reduce CO₂ emissions by 764,518 tons per year. For example, by using electric induction for

⁸ *In the Matter of Nucor Steel Louisiana LLC*, AI#157847. (2021). (Proceedings under the Louisiana Environmental Quality Act.)

https://www.deq.louisiana.gov/assets/docs/General/Settlement_Agreements/2021/Nucor0019_Final.pdf

⁹ United Steelworkers District 13. *United Steelworkers District 13 comments on Hyundai Steel Louisiana, LLC Title V Permit and PSD Permit Application*, Agency Interest No. 248885. Page, 3.

steel slab reheating rather than a walking beam furnace, the analysis shows energy use could be cut in half and costs could be reduced by \$1.1 million a month.¹⁰

Electrification could also substantially reduce pollution, including reductions in nitrogen oxide, volatile organic compounds, carbon monoxide, sulfur dioxide, and particulate matter. Those pollutants can have adverse health impacts on nearby community members and workers. By failing to analyze alternatives that would reduce their emissions, we believe HPLS did not meet the standards of the Clean Air Act or the Public Trust Doctrine. HPLS must assess the BACT in order to be in compliance with the Clean Air Act yet HPLS failed to consider viable electric alternatives to several steel-making processes.

The application failed to consider use of electrode and electric resistance boilers on the DRP pickling line.¹¹ That equipment is commercially available and would reduce CO₂ and air toxins. In the permit application, the mitigation techniques analyzed for the gas boilers are minimal and only include “good combustion practices”, “good process operation”, and “use of pipeline quality gas” despite the existence of alternatives that would much more effectively address pollution-causing gas combustion.

The application failed to consider the use of alternative technologies for the cleaning water heaters used in the continuous galvanizing lines of the cold mill despite the existence of economically viable and environmentally friendly electric alternatives.¹² Electric resistance water heaters have existed for a century and electric heat pump water heaters have become significantly more efficient. Using resistive electric heaters could reduce monthly energy costs for the cleaning of water heaters by 79% and while eliminating point source pollution.¹³

HPLS did not consider alternatives for proposed gas fired walking beam furnaces despite the existence of electric induction alternatives that have been in commercial use for decades. Induction heating can be over 90% efficient whereas natural gas furnaces can only provide 30-60% thermal efficiency. That increase in energy efficiency could translate into a savings of \$1,141,190 in monthly operating expenses. Such a change would eliminate the point source emissions of many pollutants emitted by gas-fired furnaces, such as CO₂, NO_x, SO₂,

¹⁰ Boatman, E. (2026, May). Sierra Club. *Hyundai Steel – Air Permit Application Electrified Alternatives and GHG BACT Analysis*. Page 2.

¹¹ Boatman, E. (2026). Section 2.1., Page 2.

¹² Boatman, E. (2026). Section 2.2., Page 5.

¹³ Boatman, E. (2026). Section 2.2.4., Page 6.

particulate matter, and volatile organic compounds. Despite the potential economic viability and environmental benefits of induction heating for the walking beam furnaces, HPLS did not consider those technologies in their BACT analysis.

The BACT analysis did not consider electric galvanizing lines furnaces despite their potential economic efficiency, environmental benefits, and positive impact on product quality. Instead of considering feasible alternatives, HPLS only considered installing three gas-burning galvanizing units that will release carbon dioxide and other air pollutants. Adopting electric galvanizing furnaces could eliminate point-source emissions, reduce energy use, and could lead to higher quality production due to the superior ability of electric furnaces to hold temperatures.

HPLS failed to consider electric alternatives for ladle preheaters and dryers. The application proposes the use of gas-powered ladle preheaters but does not consider alternative electric ladle preheaters despite that electric ladle preheaters could use 70% less energy than gas-powered ones. Those energy savings would translate into operating cost savings and would also eliminate point source emissions. Electrification would also provide safer air quality for workers because it would eliminate fugitive emissions that are released indoors by gas-powered ladle preheaters. Adopting an electric alternative could prevent workers from potentially being exposed to a source of NOx and volatile organic compounds.

Conclusion

Because of these flaws, LDEQ should not expedite permitting for the Hyundai-POSCO Louisiana Steel project. HPLS should provide more information regarding their consideration of alternatives to polluting processes, analyzing the climate, environmental, and occupational risks from the project before a permit is granted. Hyundai-POSCO must do more to show that the project will provide public benefits and will be in compliance with bedrock environmental protections. LDEQ must ensure that the application meets the standards of the Louisiana Public Trust Doctrine and the Clean Air Act; however, the current application raises serious concerns around Hyundai-POSCO's compliance.

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