

June 6, 2025

Ohio Senate Finance Committee  
1 Capitol Square  
Columbus, OH 43215

**RE: American Chemistry Council Letter of Support for EPACD19 Language in OH HB 96**

Dear Chairman Cirino, Vice Chair Chavez, Ranking Member Hicks-Hudson and members of the Ohio Senate Finance Committee,

The American Chemistry Council (ACC) expresses our strong support for language (EPACD19) regarding community air monitoring that was included in the House-passed version of HB 96. Although this language was removed in the substitute bill adopted earlier this week, we continue to believe in its critical importance as a proactive and necessary means to ensure that air monitoring data used by the state in future official actions is produced in accordance with principles of best available science and appropriately reviewed and refined, generating the scientifically robust and high quality monitoring data.

ACC member companies play a critical role in Ohio's economy, contributing to innovation, job creation, and the production of essential products that support several important sectors, including agriculture, healthcare, transportation, and technology. Through several chemical manufacturing facilities located within the state, ACC and its members directly and indirectly support thousands of jobs and generate significant economic output and essential products for the state and country as a whole. As regulated entities in the state, we also strongly support the separate testimony provided by the Ohio Chemistry Technology Council.

As responsible stewards of environmental health and safety, ACC members are committed to adhering to stringent regulations and continuously improving practices to reduce emissions and mitigate environmental impacts. We demonstrate this commitment to strong sustainability goals and environmental/health and safety policies through ACC's Responsible Care® program, under which ACC members work to continually improve their systems for addressing health, safety, and environmental performance. Additionally, our members' facilities operate under several existing local, state, and federal statutory and regulatory requirements, including permit conditions approved by state regulators and administered under the Clean Air Act (CAA), Clean Water Act, Resource Conservation and Recovery Act, and others. Through operation under these and other programs, ACC members recognize the importance of state administrative actions that are transparent, efficient, and based on the strongest scientific principles.

ACC believes that the state, like all regulatory entities, must ensure that its decisions are shaped by key principles like best available science, robust scientific integrity and high levels of accuracy, robust stakeholder engagement, transparent and accurate communication, and proper risk context, among others. We note that the reliability of any consideration informed by air monitoring data depends highly on factors like the quality and accuracy of the collected data and the knowledge and expertise of the persons operating the program, among others.

On this point, the language of the House-passed version of HB 96 makes the important distinction between community air monitoring programs and the state's existing regulatory monitoring program, while clarifying that official actions (e.g., permitting, enforcement) must necessarily be based on the best information available, in this case regulatory data that has been collected and reviewed in a scientifically defensible way. The measures contained in the bill's air monitoring provisions help ensure that only scientifically accurate data informs air pollution regulation in Ohio. We strongly believe that if passed, all stakeholders, including permittees and the general public, will benefit from the certainty these common-sense changes provide.

ACC recognizes the value of air monitoring data that is accurate, reflective of current conditions, and relevant to a program's purpose. We believe that data should be generated by monitors and equipment that are of high scientific and technical integrity, in good working order, and properly calibrated and maintained according to manufacturers' specifications. We also support the value of credible and accurate air monitoring data to the overall knowledge of environmental quality at the local and national levels.

As such, ACC respectfully requests that the Ohio Senate Finance Committee support the inclusion of the House-passed language with the minor amendments to avoid any negative impact on existing programs.

We appreciate the Committee's consideration of our support. If you would like to discuss these issues or have any questions, please free to contact me via phone at (202) 249-6423 or email [Brendan\\_Mascarenhas@americanchemistry.com](mailto:Brendan_Mascarenhas@americanchemistry.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Brendan Mascarenhas", enclosed in a white rectangular box.

Brendan Mascarenhas  
Senior Director, Regulatory & Scientific Affairs  
American Chemistry Council