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April 23, 2014

Chairman Frey and CASAC Panel Members  
c/o Dr. Holly Stallworth  
EPA Science Advisory Board Staff Office  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Dear Chairman Frey and CASAC Panel Members,

On behalf of the investors of the Baton Rouge Area Chamber and the business community, we are writing to express our significant concern regarding the Clean Air Scientific Advisory Committee's (CASAC) Draft Policy Assessment for the Review of National Ambient Air Quality Standards. Based on a review of the literature, it is clear that the body of evidence to determine that precise level is inconclusive. **The Baton Rouge Area Chamber is vehemently opposed to the proposed reductions in ambient air quality standards from the current level of 75 ppb.**

Despite the fact that air quality has improved greatly in recent years, the CASAC is proposing to recommend to EPA Administrator Gina McCarthy that the national ambient air quality standard for ozone be revised more stringently to 60-70 parts per billion (ppb). Such a revision would significantly damage the business economy in Baton Rouge and the entire state of Louisiana, as the main economic driver and largest industry is chemical and other manufacturing. Without additional evidence, it is reasonable to maintain the current standard of 75 parts per billion within the Panel's recommendation for an appropriate and scientifically justified range for ozone.

On April 4, 2014 the Louisiana Department of Environmental Quality announced that the U.S. Environmental Protection Agency determined that the Baton Rouge area is currently attaining the 2008 8-hour ozone standard. This determination was based on a recent review of air quality data from 2011-2013. The state has decreased ground-level ozone in Baton Rouge which improved air quality and human health for more than 800,000 residents.

*"We commend local and state officials, as well as the residents of the Baton Rouge area, who have been working collaboratively with us to reach this milestone. This accomplishment signifies the continuing commitment to protect the people and the environment."* EPA Regional Administrator Ron Curry. (Press Release from the Department of Environmental Quality, April 4, 2014.)

Preliminary air quality data for 2014 continues to show that the area meets the 2008 8-hour ozone standard. Louisiana is now working on a plan to show how the five-parish area can maintain compliance with the ozone standard for the next 10 years.

Additionally major companies like Honeywell and Dow are making significant investments to ensure that their facilities adhere to the required standards and will continue to do so in the future. Honeywell chose Baton Rouge for their manufacturing site that uses next-generation technology that enables low-global warming aerosol propellants, foam blowing agents and refrigerants which is 99 percent safer than their previous process. By 2015, Dow has stated that they will reduce company-wide emissions of volatile organic compounds by 30 percent, NOx by 30 percent and priority compounds by 30 percent. These are just two of the many chemical and other manufacturing companies in Baton Rouge that have made great strides in creating a cleaner environment.

We appreciate your time in reading this letter and again, urge you not to revise the current standards.

Sincerely,

Adam Knapp  
President and CEO, Baton Rouge Area Chamber

CC: Senator Mary Landrieu,  
Senator David Vitter  
Representative Bill Cassidy  
EPA Regional Administrator Ron Curry