

Intersociety Forum
August 15, 2025

The Honorable Brett Guthrie

Chair
House Committee on Energy and Commerce
U.S. House of Representatives
2125 Rayburn House Office Bldg.
Washington, D.C. 20515

The Honorable Frank Pallone, Jr.

Ranking Member
House Committee on Energy and Commerce
U.S. House of Representatives
2125 Rayburn House Office Bldg.
Washington, D.C. 20515

The Honorable Shelley Moore Capito

Chair
Senate Committee on Environment and Public Works
410 Dirksen Senate Office Bldg
Washington, D.C. 20510

The Honorable Sheldon Whitehouse

Ranking Member
Senate Committee on Environment and Public Works
410 Dirksen Senate Office Bldg
Washington, D.C. 20150

Dear Representatives Guthrie and Pallone, and Senators Capito and Whitehouse:

We write to express our deep concern regarding the proposed elimination of the U.S. Chemical Safety and Hazard Investigation Board (CSB) in the President's Fiscal Year 2026 budget, which recommends zero funding for the agency and effectively calls for its closure. Such a step would not only undermine statutory mandates but would also jeopardize public health, worker safety, and environmental security.

The CSB was established as an independent federal agency under **Section 112(r)(6) of the Clean Air Act**, as amended by the Clean Air Act Amendments of 1990 (42 U.S.C. § 7412(r)(6)). Congress created the Board specifically to investigate industrial chemical accidents, determine root causes, and issue recommendations to prevent future incidents. Unlike regulatory or enforcement bodies, the CSB's sole mission is investigative and preventive.

For FY2025, the CSB was appropriated approximately **\$14 million**—a modest sum for an agency whose work contributes directly to the prevention of catastrophic chemical incidents and the protection of workers, communities, and emergency responders nationwide. Yet the agency operates leanly and with a mandate that serves an irreplaceable public interest.

The Board's independent investigations have led to critical safety improvements across multiple sectors. Its work has exposed systemic deficiencies in industrial practices,

strengthened federal and state regulatory approaches, and enhanced community preparedness. Notable investigations include:

- **West Fertilizer Company Explosion (Texas, 2013):** The CSB's investigation revealed regulatory gaps in the storage of ammonium nitrate, prompting nationwide changes in chemical storage and emergency planning.
- **BP Texas City Refinery Explosion (2005):** The Board's findings exposed deep-seated flaws in corporate safety culture, leading to sweeping reforms in the petrochemical industry.
- **Philadelphia Energy Solutions Refinery Fire (2019):** The CSB's report shed light on corrosion and maintenance failures, influencing future risk-based mechanical integrity assessments.
- **Dow's Louisiana Complex Investigation (2023):** The proposed closure would halt investigations into incidents like this, which released 30,000 pounds of ethylene oxide.

In the absence of the CSB, these and countless other critical analyses and safety recommendations simply would not exist. The Occupational Safety and Health Administration (OSHA) and the Environmental Protection Agency (EPA) do not and cannot serve the same function. Neither agency possesses the statutory independence, investigatory mission, or technical specialization that the CSB was designed to provide.

Congress has repeatedly affirmed the importance of the CSB's role, and we respectfully urge you to do so again. At a time when industrial complexity, climate risk, and community vulnerability are all rising, the nation cannot afford to abandon a watchdog whose sole mission is to learn from disaster and prevent its recurrence.

We urge you to oppose any efforts to eliminate the CSB and ensure that the agency is fully funded for FY2026 and beyond.

Respectfully,

Institute of Hazardous Materials Management, Eugene A. Guilford, Jr., CAE, gguilford@ihmm.org

American Industrial Hygiene Association, Lawrence Sloan, MBA, CAE, FASAE, lsloan@aiha.org

ISEA - International Safety Equipment Association, Cam Mackey,

cmackey@safetyequipment.org

National Safety Council, Zachary M. Radford, zachary.radford@nsc.org

Campus Safety, Health, and Environmental Management Association, James Crandall,

president@cshema.org

Christian Doggett, vastchristian@yahoo.com

Relief EHS, LLC, Kathleen Doyle, kathydoyle@reliefehs.com

American College of Occupational and Environmental Medicine, Craig Sondelle,
craig@acoem.org

Board of Certified Safety Professionals, Christy Uden, christy@bcsp.org

Human Factors and Ergonomics Society, S. Camille Peres, president@hfes.org

National Environmental Health Association, Doug Farquhar, dfarquhar@neha.org

American Society of Safety Professionals, Jennifer McNelly, JMcNelly@assp.org

David Alberto Rivera, riverad2395@gmail.com

Nelson Wilkins Jr, nwil83@gmail.com

Donald Johnston, djohnston74@gmail.com

National Electronic Contractors Association, Marco Giamberardino, mgiamberardino@necanet.org