

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, August 14, 2018 2:29:05 PM

-----Original Message-----

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Tuesday, August 14, 2018 1:56 PM
To: Sunset Advisory Commission <Sunset@sunset.texas.gov>
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS BOARD PROFESSIONAL GEOSCIENTISTS TBPG

First Name: Jim

Last Name: Florey

Title: Principal, Senior Consultant

Organization you are affiliated with: W&M Environmental Group

Email:

City: Houston

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

In my experience, regulation of geoscience licensure is essential to protection of public health. Were this not the case, the Texas Commission on Environmental Quality (TCEQ, as well as numerous Texas municipal governments) would not require a licensed P.G. to seal environmental reports submitted to TCEQ, which document geoscientific investigations and recommendations specifically related to the environment and the protection of human health and other ecological receptors.

When contaminated groundwater is discovered at a property, the TCEQ requires documentation of that contamination in the form of a Drinking Water Survey Report (DWSR). The purpose of the DWSR is to inform the state of the new groundwater case, the extent of the contamination, identify potentially-affected drinking water supply wells, and inform the owners of those wells, if identified. The DWSR must be sealed by a licensed P.G., and for good reason. What would happen if anyone could sign and submit this report? How often would groundwater contamination be reported? How often would the party responsible for the contamination self-report, notify affected well owners, and take responsibility for the contamination? How could the state ensure the investigation was conducted by qualified personnel?

Providing safe drinking water is paramount in the U.S. and not surprisingly.

Cases of contaminated drinking water are well-publicized and have led to some of the most widespread human exposures to harmful chemicals. Carcinogenic classifications are very often derived from such circumstances. Licensure of geoscience is a means to ensure associated investigations and conclusions are genuine and verifiable. Protection of public drinking water alone should be means to regulate geoscientific licensure. Would the commission seek to discontinue licensure to practice medicine, law, or engineering? The sole mission of TCEQ is protect human health and the environment (primarily by protecting waters of the state). Should TCEQ also be eliminated, if there is no accountability for associated work?

Please feel encouraged to contact me regarding this issue. I can supply additional information if needed and am willing to speak publicly or privately regarding this matter.

Any Alternative or New Recommendations on This Agency:

Not only should regulation of geoscientific licensure continue, Texas should seek to expand reciprocity agreements with other states, who are also currently regulating geoscientific licensure.

Please feel encouraged to contact me regarding this issue. I can supply additional information if needed and am willing to speak publicly or privately regarding this matter.

My Comment Will Be Made Public: I agree