

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, August 16, 2018 7:49:03 AM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Wednesday, August 15, 2018 6:38 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: Anne

Last Name: Miller

Title: P.G.

Organization you are affiliated with:

Email:

City: Austin

State: Texas

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

Dear Morgan Constantino/ Sunset Commission,

Please note that I am a TCEQ Project Manager. The following comments reflect my personal opinion as an individual licensed Professional Geoscientist (P.G.).

* Based upon almost 30 years of regulatory experience, I strongly believe that continued P.G. licensing in Texas is necessary to protect human health and the environment.

* P.G. licensing by the Texas Board of Professional Geoscientists (TBPG) provides enforceable standards for geologic work submitted to regulatory agencies. Prior to P.G. licensure, environmental site assessments were prepared by a variety of consultants, including construction contractors without any geoscience education or experience. Unacceptable work by unqualified consultants had to be redone, with the additional costs paid by regulated entities.

* TBPG's Enforcement of P.G. licensing and Geoscience Firm registration requirements serves as a deterrent to the performance of geoscience work by unqualified individuals and consultants.

* When contaminants are released into the environment, a P.G. is responsible for overseeing an environmental site assessment and reporting the results to the appropriate regulatory agency. P.G.s assess the subsurface geology, the local groundwater/ aquifer flow conditions and the contaminant plume dimensions. They also determine whether a contaminant plume poses any potential threat to human health via receptors such as water supply wells. A licensed P.G.'s education and experience in geosciences are critical for accurate assessment of contaminant plumes and the evaluation of potential receptors.

* As an environmental regulator, I rely heavily on the technical expertise of P.G.s who supervise environmental site assessments and submit reports. While a geology degree and experience may facilitate my review of reported data, it is the P.G. who directly oversees the subsurface investigation and the interpretation of the geologic data who is usually best equipped to evaluate the actual site conditions and threat to human health.

* P.G.s are required to follow a Code of Professional Conduct that promotes Ethics and accountability, thereby providing additional protection for human health and the environment.

* P.G.s accept responsibility for the protection of public health by affixing P.G. seals to soil boring logs, maps and reports. I am very concerned that the State of Texas will be assuming additional liability for the protection of public health if P.G. licensing is discontinued.

* It is my opinion that licensing of professionals is warranted when necessary to prevent adverse impacts to public health and the environment.

As an example, I believe that the BP Oil Spill disaster could have been prevented if licensed professionals had been responsible for supervising the drilling and completion of the Macondo oil well.

Thank you for considering my personal comments.

Anne Miller, P.G.

Any Alternative or New Recommendations on This Agency:

I believe that the TBPG is the appropriate agency to regulate P.G. licensing and Geoscience Firm registration.

My Comment Will Be Made Public: I agree