

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, August 15, 2018 11:32:14 AM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Wednesday, August 15, 2018 11:23 AM
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: John

Last Name: Sallman

Title: Assistant Director of Environmental Services

Organization you are affiliated with: Terracon Consultants, Inc.

Email:

City: Olathe

State: Kansas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: I disagree with the assertion that PG licensure is not protecting the public. Requiring a professional with the proper training and education to perform contaminated media risk assessments and evaluate the potential risks and exposures to the public is critical to ensuring the health and welfare of the public. Although other agencies, such as TCEQ, may oversee work completed by Geoscientists, without requirements that a Geoscientist perform the work, any person may submit work that requires the specialization, knowledge and understanding that is unique to geologists to properly protect the public. In the absence of geoscientist licensure, there are no standards to be upheld by a regulating agency. Some states (New Jersey, Massachusetts and Connecticut) have enacted programs for remediation professionals that are similar to both professional engineering and professional geoscientist licensure as a means of regulating professional performing environmental remediation work in lieu of geoscientist licensure.

In my experience working in Texas since 1994 and as a licensed Geoscientist (#219) in Texas, the quality of work and protection of the public has improved greatly. The lack of enforcement actions speaks to the nature of the professional conducting excellent, high quality work, and not the lack of desire to enforce or lack of care to enforce on individuals operating without the public interest in mind. Having reviewed hundreds of remediation and site closure reports dealing with contamination issues, the public was poorly protected prior to the geoscientist act enactment, and the quality and attention to protecting the public increased immensely after the act. To sunset the TBPG would be taking a step backwards for the state and the public.

Any Alternative or New Recommendations on This Agency: If the TBPG is to be sunset, then alternative licensures need to be enacted to ensure the protection of the public similar to what New Jersey, Massachusetts and Connecticut have done. Additionally, the TBPG should not be sunset until such time as any new licensure programs are in effect.

My Comment Will Be Made Public: I agree