

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, August 15, 2018 11:47:40 AM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Wednesday, August 15, 2018 11:47 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: Paul

Last Name: Taylor

Title: Liability Business Manager

Organization you are affiliated with: BP Remediation Management Services Company

Email:

City: Houston

State: Texas

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

I strongly oppose the Staff's Report conclusions that the TX PG Program "did not provide meaningful public protection". If this was true, then why did EPA/TCEQ, during Hurricane Harvey (2017), mandate that all TX Gulf Coast area Superfund Sites collect soil and ground water samples to prove that these Sites had maintained their integrity during the extensive flooding--if it were not to prove to the agencies AND PUBLIC that there was protection of HUMAN HEALTH and the ENVIRONMENT. There was National media coverage demanding this work during this catastrophic event. Many, if not all, of these investigations were conducted by PG licensed staff or oversight.

Further, the licensure program for PGs ensures that a standard of care and qualifications exists in our industry and communities that safeguards against shoddy work that can create or exacerbate contamination of soil and groundwater sites that ultimately presents a risk of exposure to people.

Lastly, the whole reason for the creation of RCRA and CERCLA by Congress was [ultimately] for the protection of human health and the environment. Any type of hydrogeologic work performed in the context of these national programs on Texas sites MUST be performed by qualified and trained PGs both in industry and consulting to ensure the appropriate and accurate performance and delivery of work products on intrinsically complex subsurface conditions.

As to your statement that the TCEQ has some oversight within these programs with qualified people--they cannot possibly engage at a tactical level of all the work that occurs every year on a day-to-day basis. If our State PG program was irrelevant, as your Report seems to conclude overall, then why do many other States have such programs? Thank you.

Any Alternative or New Recommendations on This Agency: It is my opinion that the TBPG has done a great job at administering the licensure program which has ensured that a Standard-of-Care exists within Texas for quality geoscience work to be performed across our great State.

My Comment Will Be Made Public: I agree