

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, August 15, 2018 7:58:48 AM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Tuesday, August 14, 2018 10:25 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: Josh

Last Name: Ward

Title: Professional Geologist

Organization you are affiliated with: TRC Environmental

Email:

City: Austin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: Other arguments notwithstanding the main thrust of the sunset recommendation seems to be that unregulated practice of geosciences in the State of Texas does not represent a "clear threat to the health, safety, and welfare of the public." I respectfully disagree. Professional geologists represent the front line in the investigation and remediation of contaminated soil and groundwater. Site specific conceptual models are critical to understanding the fate and transport of contaminants at remediation sites. Professional geologists create these models based on real and observed geologic and hydrogeologic conditions. Regulatory oversight by the RRC and TCEQ can provide guidance and decision making based on concentration limits but cannot replace real geologic data collection and interpretation. Site-specific conditions are often used to adjust or modify protective concentration limits. With no means to hold individuals practicing geoscientists to any sort of standards or uniformity risk-based cleanup becomes a meaningless endeavor. Lack of effective regulation of geosciences in Texas will directly lead to costlier cleanups and increased risk to the public without saving the State any money. TBPG fees are reasonable and the board is self supporting.

Any Alternative or New Recommendations on This Agency: None

My Comment Will Be Made Public: I agree