

Pacific Northwest Chapter - Alliance of Hazardous Materials Professionals

The two Certified Hazardous Materials Manager (CHMM) chapters in Washington are pleased to provide Ecology with the attached Summary Addendum, following up on our August 2017 comments on the WAC 173-360A Preliminary Draft Rule. This Summary Addendum briefly summarizes some main points of our previous comments, and also addresses concerns identified during our follow-up discussions, including:

- Clarification regarding the role of on-the-job training for CHMMs being competent in UST site assessment, and
- Demonstration of equivalence of the CHMM credential in addressing state-specific certification requirements.

We look forward to providing any needed follow-up should any of the provided information require further clarification. Thank you for all your time and consideration.



PACIFIC NORTH WEST CHAPTER Alliance of Hazardous Materials Professionals

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December 6, 2017

Michael Feldcamp, Policy and Legislative Coordinator
Department of Ecology, Toxics Cleanup Program
Post Office Box 47600
Olympia, WA 98504-7600

Subject: Summary Addendum to Comments on Preliminary Draft Rule WAC 173-360A-930(3), UST Site Assessment Service Providers.

Cc: Kristopher Grinnell

Dear Mr. Feldcamp,

Regarding the Site Assessment Service Provider qualifications described in WAC 173-360A-930(3), please accept this summary addendum for our previous submittal to Mr. Grinnell on 8/18/17. We would like to validate inclusion of the CHMM credential as a listed Site Assessment Service Provider having demonstrated competence in site assessment by means of education, examination and experience.

As described in our correspondence of 8/18/17, regarding the *educational* requirements in order to obtain the CHMM credential, a candidate must meet two prerequisites prior to taking the CHMM examination, 1) a Baccalaureate degree from an accredited college or university, 2) a Minimum of four years of relevant experience in the field of hazardous materials management or related career. After meeting these requirements, a candidate must pass a rigorous test administered by the Institute of Hazardous Materials Management (IHMM). The IHMM provides this nationally and internationally recognized certification that is accredited by the Council of Engineering and Scientific Specialty Boards (CESB; also accredits Professional Engineers), the American National Standards Institute (ANSI), and similarly meets the International Standard for Personnel Certification Programs (ANSI/ISO/IEC 17024).

As also previously described, this *examination* requires the candidate to demonstrate knowledge on a broad base of relevant Federal regulatory programs, science topics, and professional practices to protect human health and the environment. This examination involves many subjects that relate directly to UST site assessment work, including: environmental assessment, Federal UST Regulations, hydrogeology, UST management, sampling and analysis of hazardous materials, remediation methods and technologies, hazard recognition and characterization, chemical and petroleum properties, health and safety and emergency response planning, toxicological principles, and management systems, recordkeeping, and reporting. Based upon the educational and examination requirements above, it would appear that the CHMM credential fulfills the required criteria listed in WAC 173-360A-930(3)(b) and WAC 173-360A-930(3)(c).

Confirmation of CHMM *experience* to demonstrate professional competence in state-specific UST Site Assessment is *identical* to that of Professional Engineers and Licensed Geologists in Washington. Only after supervised professional experience in Washington State Specific UST Site Assessments would a CHMM then independently perform such work. This experience requirement is ensured through the CHMM Code of Ethics. The Code of Ethics restricts CHMMs from practicing outside their area of professional competency, and violation of the Code can result in suspension or revocation of the credential. CHMMs, Professional Engineers, and Licensed Geologists all gain proficiency addressing state-specific requirements during their supervised professional experience. However, unlike Engineers and Geologists, CHMMs must re-certify every five years to remain current and proficient in the related knowledge, skills, and abilities associated with UST site assessments.

As shown above, the CHMM credential meets the Site Assessment Service Provider requirements consistent with both the intent and practical expectations described in WAC 173-360A-930(3) and 40 CFR §280.45(a). Please consider the information summarized above to validate inclusion of the CHMM credential into WAC 173-360A-930(3)(d) as follows, “[Being licensed as a professional engineer or hydrogeologist in Washington State under chapter 18.43 or 18.220 RCW, or being a credentialed Certified Hazardous Materials Manager \(CHMM\), and being able to demonstrate competence in site assessment by means of examination, experience, or education.](#)” We look forward to speaking with you in person should any of the provided information need further clarification. Thank you for all your time and consideration.

Very Truly Yours,



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Chair, Government Affairs Committee, Pacific Northwest Chapter, Alliance of Hazardous Materials Professionals



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