

UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
WASHINGTON, D.C. 20240  
<http://www.blm.gov>

February 6, 2015

In Reply Refer To:  
1703 (WO-280) P

EMS TRANSMISSION  
Information Bulletin No. **2015-029**

To: All Field Office Officials  
Attn: Hazard Materials Management Program Leads, Lands and  
Realty Program Leads

From: Assistant Director, Resources and Planning

Subject: **Identification of Bureau of Land Management Environmental Professionals and  
Application Requirements**

This Information Bulletin (IB) provides managers with a list of the Bureau of Land Management (BLM) Environmental Professionals (EP) qualified to conduct Environmental Site Assessments (ESA) for property acquisitions. This IB is effective immediately.

Regulation 40 CFR Part 312 provides that only an EP may certify an ESA. An EP is defined as “someone who possesses sufficient specific education, training, and experience necessary to exercise professional judgment to develop opinions and conclusions regarding conditions indicative of releases or threatened releases of hazardous substance on, at, or to a property, sufficient to meet the objectives and performance factors of the rule.” An ESA must be conducted on all new land acquisitions as required by 602 Department Manual 2.

Attachment 1 is a comprehensive list of EPs who meet the requirements of 40 CFR Part 312 and are authorized to conduct ESAs for BLM land purchases, exchanges, sales, leases, grants, or any other type of land acquisition in which the BLM gains a real property interest. Managers are encouraged to support training to ensure that EPs meet the continuing education requirements of 40 CFR Part 312.

Managers who do not have an EP on staff must either contact an EP listed on Attachment 1 to conduct an ESA, or request assistance from their Hazardous Materials Management (HMM) State Office Program Lead. BLM offers a process for EP candidates to be certified by the federal government as documented in 40 CFR Part 312.10 (b)(2)(ii). The EP Process is described in Attachment 2. An EP application is provided as Attachment 3 for individuals to use in applying for EP status. The BLM Washington Office coordinates with an EP Panel, the National Training Center, and the HMM State Office Program Leads to:

- Distribute an updated EP list via an IB.
- Solicit applications from candidates seeking to become an EP.

This IB has been coordinated with the Washington Office Division of Environmental Quality and Protection (WO-280) and Division of Lands, Realty and Cadastral Survey (WO-350).

Please direct any questions regarding this IB to J. Kimberly Harriz, Environmental Engineer, 202-912-7126, Division of Environmental Quality and Protection (WO-280).

Signed by: Edwin L. Roberson  
Assistant Director, Resources and Planning

Authenticated by: Catherine Emmett  
Division of IRM Governance, WO-860

3 Attachments

- 1 - List of BLM Environmental Professionals (2 pp)
- 2 - Environmental Professional Process (2 pp)
- 3 - Environmental Professional Application (7 pp)

**Bureau of Land Management  
Recognized Environmental Professionals List  
February 2015**

<b>State</b>	<b>Individual</b>	<b>Date Test Passed</b>
AK	Dave Mushovic	Sep-07
AK	Susan Flora	Sep-07
AK	Larry Beck	Sep-07
AK	Wayne Svejnoha	Oct-07
AK	Rebecca Hile	Aug-13
AZ	Cathy Wolff-White	Sep-08
AZ	Michael Werner	Mar-09
AZ	Mariano Lanza	Feb-11
AZ	Daniel Moore	Feb-11
AZ	William Harris	Oct-07
CA	Charles Wright	Oct-07
CA	Peter Graves	Mar-08
CA	Janet Eubanks	Dec-07
CA	Scott Eubanks	Dec-07
CO	Alan Kraus	Mar-08
CO	David Jevons	Oct-07
CO	Brent Lewis	Feb-11
CO	Stephanie Odell	Sep-07
CO	James R. Roberts	Mar-08
ES	Brian Kennedy	Jun-05
ID	Charles Mike Stevenson	Dec-07
ID	Dan Kotansky	Mar-08
ID	Cheryl Seath	Oct-07
ID	Carrie Wontorcik	Mar-09
ID	Dick Todd	Mar-08
ID	Colleen O'Hara-Epperly	Aug-13
ID	Brandy Janzen	Aug-13
ID	Tom Askew	Feb-11
MT	Peter Bierbach	Sep-07
MT	Russ Pigors	Dec-07
MT	James Ledger	Dec-07
MT	Corey Meier	Feb-11
NM	Albert Collar	Dec-07
NV	Melanie Peterson	Feb-11
NV	John Callan	Aug-13
NV	Dan Erbis	Mar-08
NV	Deb McFarland	Oct-07
OR	John Barber	Mar-08
OR	Steve Storo	Feb-11
OR	Sonia Mason	Mar-09
OR	Todd Bush	Feb-11

<b>State</b>	<b>Individual</b>	<b>Date Test Passed</b>
OR	Rick Wells	Aug-13
OR	Elizabeth Earp	Feb-11
UT	Floyd Johnson	Mar-09
UT	John Reay	Aug-13
WY	Timothy J. Zebulske	Dec-07
WY	Ken Henke	Feb-11
WY	Nyle Layton	Feb-11

## **ENVIRONMENTAL PROFESSIONAL PROCESS**

### **1. Application Process**

Individuals interested in becoming an Environmental Professional (EP) must provide an application to the Hazard Materials Management State Office Program Lead (SOPL) for review and concurrence. Upon review, the SOPL will determine if the applicant does not meet the requirements or forward the application to the EP panel for further consideration and evaluation. If the EP panel determines the applicant meets the qualifications based on 40 CFR Part 312.10(b)(2), she or he will be added to the EP list. Applicants who do not meet the requirements will be notified.

### **2. Qualifying under 40 CFR Part 312.10(b) (2) (i), (iii), and (iv)**

Candidates qualifying under this criterion can conduct Environmental Site Assessments upon concurrence of the EP panel. 40 CFR Part 312.10(b) (3) states that an EP should remain current through continuing education. Candidates may be requested to take the EP course at NTC as a refresher.

### **3. Qualifying under 40 CFR Part 312.10(b) (2) (ii) Certified by the Federal Government**

If the EP panel determines the applicant has the equivalent of 3 years of full-time relevant experience but needs to be certified by the Federal government to qualify as an EP, he or she will be recommended for the EP course at NTC. Applicants who seek to be qualified by being certified by the Federal government must complete and pass the BLM EP course.

### **4. Roles and Responsibilities in the Environmental Professional Process**

- State Office Program Leads (SOPL)
  - Provide recommendations for training
  - Validate information
  - Ensure each State have a cadre of trained Environmental Professionals (EP)  
Review, comment and concur with applications
  - Maintain the EP list as needed
  - Evaluate relevant full time experience
  
- Environmental Professional Panel
  - Ensure the national list is updated annually
  - Coordinate with the National Training Center, and SOPLs to review applications for certification
  - Serve as the final authority to determine who meets EP qualifications.
  
- Washington Office

- Coordinate with the National Training Center to ensure training is available for those seeking to stay current and those seeking to become qualified as EPs
  - Distribute the list of EPs via Instruction Bulletin
- National Training Center
  - Coordinate with the Washington Office to ensure training is available for those seeking to stay current and those seeking to become qualified as EPs
  - Coordinate Training results with Panel

# Environmental Professional Application

The purpose of this questionnaire is to use the information provided to determine if the individual completing the questionnaire meets the definition of *environmental professional* as defined in 40 CFR Part 312.10. This is a multipart questionnaire.

Part A: To be completed by the individual.

Part B: To be completed by State Office HAZMAT Program Lead.

Part C: To be completed by WO 280.

## **Part A - To be completed by the individual:**

Name: \_\_\_\_\_ Office: \_\_\_\_\_

Grade/Series/Title: \_\_\_\_\_

Phone Number: \_\_\_\_\_

E Mail Address: \_\_\_\_\_ Date: \_\_\_\_\_

## **Licensing, Registration, Certification, and/or Education (Refer to Definitions)**

1. Do you hold a current Professional Engineer's or Professional Geologist's license or registration from a state, tribe, or U.S. Territory: If Yes, describe:  Yes  No  
\_\_\_\_\_
2. Are you licensed or certified by the federal government, a state, or U.S. Territory to perform environmental inquiries as defined in § 312.21: If Yes, describe:  Yes  No  
\_\_\_\_\_
3. Do you have a Baccalaureate or higher degree from an accredited Institution of higher education in a discipline of engineering or science.  Yes  No
4. Have the equivalent of ten (10) years of full time relevant experience.  Yes  No

**Education/Training**

Academic Information (List All)

University: \_\_\_\_\_  
Major: \_\_\_\_\_  
Degree: \_\_\_\_\_ Date \_\_\_\_\_

University: \_\_\_\_\_  
Major: \_\_\_\_\_  
Degree: \_\_\_\_\_ Date \_\_\_\_\_

University: \_\_\_\_\_  
Major: \_\_\_\_\_  
Degree: \_\_\_\_\_ Date \_\_\_\_\_

BLM Training (list all that are applicable to this application; see attachment for guidance)

Number	Title	Date Completed	Length

Other Training (EPA/ASTM/etc that are applicable to this application; see attachment for guidance)

Number	Title	Date Completed	Length

## Relevant Experience

1. Years spent participating in environmental site assessments including preliminary analysis (PA), initial assessment (IA), Phase I, Phase II, and Phase III.

Specify period (mm/yyyy): \_\_\_\_\_ to \_\_\_\_\_

Percent Time Spent on These Activities During Period \_\_\_\_ %

Describe your role/responsibilities:

2. Years spent working on CERCLA cleanup activities.

Specify period (mm/yyyy): \_\_\_\_\_ to \_\_\_\_\_

Percent Time Spent on These Activities During Period \_\_\_\_ %

Describe your role/responsibilities:

3. Years spent working on RCRA cleanup activities.

Specify period (mm/yyyy): \_\_\_\_\_ to \_\_\_\_\_

Percent Time Spent on These Activities During Period \_\_\_\_ %

Describe your role/responsibilities:



4. Other Experience (ie. NEPA Analysis) include fulltime month equivalents :

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5. \_\_\_\_ I believe \_\_\_\_ I do not believe I meet the requirements for  
“environmental professional” as defined at 40 CFR 312.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Applicant Name: \_\_\_\_\_

**PART B - To be completed by State Office HAZMAT Program Lead**

**Concurrence**

\_\_\_ I believe \_\_\_ I do not believe this individual meets the requirements for environmental professional found at 40 CFR 312.10.

**Comments:**

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Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

E Mail Address: \_\_\_\_\_

Office: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Date: \_\_\_\_\_

**PART C - To be completed by WO 280:**

**Review of Part A and B**

**Concurrence**

\_\_\_ I believe \_\_\_ I do not believe this individual meets the requirements for environmental professional found at 40 CFR 312.10.

**Comments:**

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Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

E Mail Address: \_\_\_\_\_

Office: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Date: \_\_\_\_\_

Use this attachment to assist in the completion of the **Licensing, Registration, Certification, and/or Education** portion of the questionnaire.

**Definition of Environmental Professional found at 40 CFR 312.10**

*Environmental Professional means:*

(1) a person who possesses sufficient specific education, training, and experience necessary to exercise professional judgment to develop opinions and conclusions regarding conditions indicative of releases or threatened releases (see § 312.1(c)) on, at, or to a property, sufficient to meet the objectives and performance factors in § 312.20(e) and (f).

(2) Such a person must:

(i) Hold a current Professional Engineer's or Professional Geologist's license or registration from a state, tribe, or U.S. Territory (or the Commonwealth of Puerto Rico) and have the equivalent of three (3) years full-time relevant experience; or

(ii) Be licensed or certified by the federal government, a state, tribe, or U.S. Territory (or the Commonwealth of Puerto Rico) to perform environmental site inquiries as defined in §312.21 and have the equivalent of three (3) years full-time relevant experience; or

(iii) Have a Baccalaureate or higher degree from an accredited institution of higher education in a discipline of engineering or science and the equivalent of five (5) years of full-time relevant experience.

(iv) Have the equivalent of ten (10) years of full time relevant experience.

(3) An environmental professional should remain current in his or her field through participation in continuing education or other activities.

(4) The definition of environmental professional provided above does not preempt state professional licensing or registration requirements such as those for a professional geologist, engineer, or site remediation professional. Before commencing work, a person should determine the applicability of state professional licensing or registration laws to the activities to be undertaken as part of the inquiry identified in § 312.21(b).

(5) A person who does not qualify as an environmental professional under the foregoing definition may assist in the conduct of all appropriate inquiries in accordance with this part if such person is under the supervision or responsible charge of a person meeting the definition of an environmental professional provided above when conducting such activities.

## Relevant Experience

Relevant Experience as defined in 40 CFR 312:

*Relevant Experience*, as used in the definition of environmental professional in this section, means: participation in the performance of all appropriate inquiries investigations, environmental site assessments, or other site investigations that may include environmental analyses, investigations, and remediation which involve the understanding of surface and subsurface environmental conditions and the processes used to evaluate these conditions and for which professional judgment was used to develop opinions regarding conditions indicative of releases or threatened release (see § 321(c)) to the subject property.

Generally, there are three categories of relevant experience that can be used to determine experience qualifications, as follows:

1. Environmental site assessment work to include preliminary analysis, initial assessment, Phase I, Phase II, and Phase III, which will always be considered relevant.
2. CERCLA Preliminary Assessment and Site Inspection Experience which will always be considered relevant.
3. Other environmental experience (i.e. NEPA, RMPs, etc.) that mirrors the underlying processes of conducting environmental site assessments, which need to be evaluated for relevancy on a case-by-case basis.

## Training

Use this attachment to assist in the completion of the **Training** portion of the questionnaire.

1. List all BLM training courses and date completed that are pertinent to you being qualified as an Environmental Professional. In this table, focus on courses that would support the training aspect of meeting the requirements for environmental professional. Examples include HAZWOPER, COR/PI, Realty, NEPA, etc.
2. List other training that would support environmental professional qualification. In this table, focus on courses provided by private vendors that would support the training aspect of meeting the requirements for environmental professional. Examples include ASTM ESA Training, Government Institutes ESA Training, and other training directly related to ESAs. Also include any EPA or State Environmental Agency training that is directly or indirectly related to ESAs.