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QUALIFICATIONS NECESSARY TO PERFORM ENVIRONMENTAL  
REMEDATION TASKS

United States Environmental Protection Agency  
Washington, D.C. 20460  
Office of Solid Waste and Emergency Response

September 14, 1994

Mr. Willard R. Kleckner  
Oxford Environmental, Inc.  
25 Riverside Drive  
Pine Brook, New Jersey 07058

Dear Mr. Kleckner:

Thank you for your letter of August 10, 1994 regarding your request for information on the qualifications necessary to perform environmental remediation tasks under Environmental Protection Agency (EPA) regulations. I understand that you spoke to Wayne Roepe of my staff about this issue.

EPA regulations promulgated under the Resource Conservation and Recovery (RCRA) contain a definition of "qualified ground water scientist." (See 40 CFR 258.50(f) and 40 CFR 260.10). This definition states that a "qualified ground-water scientist" is a scientist or engineer who has received a baccalaureate or post-graduate degree in the natural sciences or engineering, and who has sufficient training- and experience in ground-water hydrogeology and related fields. This may be demonstrated by state registration, professional certification, or completion of accredited university programs that enable an individual to make sound professional judgements regarding ground-water monitoring, contaminant fate and transport, and corrective-action. Unfortunately, this definition only directly addresses one scientific discipline, but it is the only one that exists under the RCRA program. However, the principles it embodies can be applied to related scientific disciplines such as environmental engineering.

You also raise concerns regarding the present New Jersey Professional Engineers Examination, which does not address environmental issues. The relevant RCRA definitions do not specifically regulate the contents of a professional certification, nor do they address other organizations such as the National Registry of Environmental Professionals. However, the definitions do state that a person conducting a particular activity must have

the appropriate training and experience. Further, under 40 CFR 271.1(i)(1), States are allowed to adopt or enforce provisions which are more stringent or broader in scope than the federal RCRA provisions.

I hope that this information has been helpful. If you have further questions, please call Wayne Roepe of my staff at (703) 308-8630.

Sincerely yours,

Michael Shapiro, Director  
Office of Solid Waste

Enclosure