Crosswalk Between 40 CFR 312.10 Definitions of “Environmental Professional” and the IHMM CHMM Requirements and Specification Blueprint

**40 CFR § 312.10 Definitions**

Environmental Professional

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, in, or to a property, sufficient to meet the objectives and performance factors in § 312.20(e) and (f).

2. 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; or

2. 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.

**IHMM CHMM Blueprint**

See the IHMM CHMM Specification Blueprint under “Domains and Competencies/ Tasks; Domains 1 through 12 for specific education, training and experience for § 312.1(c)) on, at, in, or to a property, sufficient to meet the objectives and performance factors in § 312.20(e) and (f). **Exceeds 40 CFR 312**

2. iii. Requires a Baccalaureate degree or higher from an accredited college or university and a minimum of 4 years of relevant experience in the field of hazardous materials management or related field. **At 5 years or more meets or exceeds 40 CFR 312**

3. Requires recertification every 5 years by earning a minimum of 200 certification maintenance points directly related to the domains of the CHMM blueprint. **Meets or exceeds 40 CFR 312.**
“In response to requests from members of independent certification organizations that EPA recognize in the regulation those organizations whose certification requirements meet the environmental professional qualifications included in the final rule, we point out that today’s final rule does not reference any private party professional certification standards.

Such an approach would require that EPA review the certification requirements of each organization to determine whether or not each organization’s certification requirements meet or exceed the regulatory qualifications for an environmental professional. Given that there may be many such organizations and given that each organization may review and change its certification qualifications on a frequent or periodic basis, we conclude that such an undertaking is not practicable. EPA does not have the necessary resources to review the procedures of each private certification organization and review and approve each organization’s certification qualifications.

Continued on Page 3...
Therefore, the final rule includes within the regulatory definition of an environmental professional, general performance-based standards or qualifications or determining who may meet the definition of an environmental professional for the purposes of conducting all appropriate inquiries. These standards include education and experience qualifications, as summarized below. The final rule does not recognize, or reference, any private organization’s certification program within the context of the regulatory language. However, the Agency notes that any individual with a certification from a private certification organization where the organization’s certification qualifications include the same or more stringent education and experience requirements as those included in today’s final regulation will meet the definition of an environmental professional for the purposes of this regulation.”
Crosswalk Between 40 CFR 312.10 Definitions of “Environmental Professional” and the IHMM CHMM Requirements and Specification Blueprint

40 CFR § 312.10 Definitions
Environmental Professional

From page 3., continued

Therefore, the final rule includes within the regulatory definition of an environmental professional, general performance-based standards or qualifications or determining who may meet the definition of an environmental professional for the purposes of conducting all appropriate inquiries. These standards include education and experience qualifications, as summarized below. The final rule does not recognize, or reference, any private organization’s certification program within the context of the regulatory language. However, the Agency notes that any individual with a certification from a private certification organization where the organization’s certification qualifications include the same or more stringent education and experience requirements as those included in today’s final regulation will meet the definition of an environmental professional for the purposes of this regulation.”

IHMM CHMM Blueprint

From page 3, continued

Domain 11. Environmental Studies. 5 subdomains covering environmental due diligence, property transfers, building surveys, contamination exposure routes. Meets or exceeds 40 CFR 312.


https://ihmm.org/chmm/