



Governor Joe Lombardo
State of Nevada
State Capitol Building
101 N. Carson Street
Carson City, NV 89701

March 2, 2023

Dear Governor Lombardo,

Congratulations and thank you for issuing Executive Order 2023-004 in January. It is on that Executive Order that we write to you today.

https://gov.nv.gov/Newsroom/ExecOrders/2023/Executive_Order_2023-004/

The Nevada Division of Environmental Protection currently administers a “Certified Environmental Manager” [CEM] program to manage hazardous waste, respond to and clean up releases of hazardous substances, remediation of soil or water contaminated by hazardous substances, and other associated purposes (NAC 459.970 – 459.9729).

The reciprocity provisions [NAC 459.972 [3][b]] allowed for in the Nevada DEP CEM program still require the applicant to take a Nevada exam even though the applicant has passed an exam elsewhere. **Nevada and New Jersey** are among the few states in the nation **without** full reciprocity provisions and, at the same time, provide for no recognition of other professional credentials **in place of** the state-mandated licensing program. In the case of the IHMM CHMM credential, our requirements are virtually identical to those of the Nevada DEP and the CEM licensing program.

Further, the 13 states of *New York, Connecticut, Pennsylvania, Indiana, California, Colorado, Nebraska, Minnesota, Arkansas, Oklahoma, Ohio, North Dakota, and Georgia* are states where IHMM credentials are cited or 40 CFR 312.10 is cited by reference. In the 16 states of *Alaska, Hawaii, Idaho, Montana, Arizona, Kansas, Iowa, Missouri, Illinois, Kentucky, Florida, Delaware, Rhode Island, Massachusetts, Vermont, and Maine* are states where the requirements of an “environmental professional” match those of 40 CFR 312.10. Finally, there are 21 states where no reference to an IHMM credential is made in either statute or regulation, nor is there anything defined in the area of an environmental professional.

Since 1984, the Institute of Hazardous Materials Management [IHMM] has created and maintained the [Certified Hazardous Materials Manager \[CHMM®\]](#) credential, [recognized by U.S. Environmental Protection Agency regulation 40 CFR § 312.10, as an “Environmental Professional.”](#) The IHMM CHMM credential is further accredited by the American National Standards Institute [ANAB/ANSI], the gold standard of accreditation under international standard ISO/IEC 17024.

The ANAB symbol signals to an employer that the credential holder has undergone a valid, fair, and reliable assessment to verify that they have the necessary competencies to practice. ANAB accreditation provides an added layer of legal defensibility against invalid claims. Many government agencies, such as



Accredited by the American National Standards Institute and
the Council of Engineering and Scientific Specialty Boards



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the U.S. Department of Defense, Department of Energy, Federal and State OSHA, and the FDA, rely on ANAB accreditation as it assures the competency of the certification program.

The core of the IHMM CHMM credential is its blueprint, which I am attaching to this letter. The 12 domains and 85 subdomains encompass not only the requirements of the Nevada CEM program but further encompass the primary legal authorities administered by the U.S. Environmental Protection Agency.

In light of the spirit and writing of Executive Order 2023-004, we encourage you to do the following:

1. Require the Nevada DEP to adopt recognition of the IHMM CHMM credential as an acceptable credential taking the place of the CEM license; and
2. Have the Nevada DEP enter into a compact with IHMM allowing for the Nevada DEP to take IHMM's CHMM examination as a guest of IHMM, and to appoint one employee of the Nevada DEP to sit on the IHMM CHMM Scheme Committee to participate in the ongoing development of the IHMM CHMM credential; or
3. Replace the Nevada DEP CEM program with the IHMM CHMM credential or its equivalent that meets the requirements of U.S. Environmental Protection Agency regulation 40 CFR § 312.10, as an "Environmental Professional."

The IHMM CHMM credential is the strongest environmental credential in America. After passing the CHMM examination and becoming certified, holders of the CHMM credential must recertify their credential by earning 200 points over 5 years in the areas of the CHMM blueprint, ensuring that the CHMM credential holder constantly seeks to upgrade their skills, knowledge, and abilities.

IHMM also has a foundation, the Hazardous Materials Society, <https://hazmatsociety.org/education-training/> whose core purpose is the education and training of IHMM certificants and applicants. With some 1,400 programs, HMS' support of IHMM's credential holders means our certified professionals have access to the strongest education and training assets available. We would be pleased to work with Nevada and the Nevada DEP in the development of programs strengthening hazardous materials management programs.

IHMM again thanks you for your Executive Order, and looks forward to working with you and the agencies of the Nevada state government on all matters relating to professional licensing, reciprocity with professional credentialing programs, and ensuring that our citizens are served by the best professionals available.

Sincerely,



Eugene A. Guilford, Jr., CAE
Executive Director