



July 1, 2026

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Nicole Shao, Office of Ground Water and Drinking Water, Standards and Risk Management Division (Mail Code 4601M), Environmental Protection Agency, 1200 Pennsylvania Avenue, NW, Washington, DC 20460

**Concerning:**

**Docket ID No. EPA-HQ-OW-2025-0654  
RIN 2040-AG53**

**Rescission of Regulatory Determinations and Removal of Related Provisions for Four PFAS Substances (PFHxS, PFNA, HFPO-DA (GenX), and the Mixture of These Three PFAS Plus PFBS)**

**Docket ID No. EPA-HQ-OW-2025-1742  
RIN 2040-AG49**

**Extending the Compliance Deadline for the PFOA and PFOS Maximum Contaminant Levels**

Submitted to Regulations.Gov

Dear Ms. Lan and Ms. Shao,

The Institute of Hazardous Materials Management [IHMM] is pleased to submit comments concerning the docket cited above regarding the U.S. Environmental Protection Agency's Notice of Proposed Rulemaking under Dockets **EPA-HQ-OW-2025-1742** and **EPA-HQ-OW-2025-0654**

Founded in 1984, the Institute of Hazardous Materials Management® (IHMM®) is a not-for-profit organization headquartered in Rockville, Maryland, operating in all 50 states and 85 countries. IHMM has been protecting the environment and the public's health, safety, and security through the creation of credentials recognizing professionals who have demonstrated a high level of knowledge,



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expertise, and excellence in the management of hazardous materials, dangerous goods transportation, environmental protection, health, and workplace safety.

It is primarily through three of IHMM's professional credentials that we provide comments in this submission: the Certified Hazardous Materials Manager® [CHMM®] and the Certified Hazardous Materials Practitioner® [CHMP®].

Both of these credentials are accredited by the ANSI National Accreditation Board [ANAB], under the international ISO/IEC 17024-2012 standard, containing principles and requirements for a body certifying persons against specific requirements, and includes the development and maintenance of a certification scheme for persons.

ANSI/ANAB accreditation of IHMM's credentials is the strongest and highest level of accreditation of professional credentials and serves as the indicator of the vigorous ANSI annual surveillance process. ANSI accreditation is recognized both nationally and internationally and has become the hallmark of a quality certification program.

The IHMM CHMM and CHMP certification programs are also accredited by The Council of Engineering & Scientific Specialty Boards (CESB). CESB is an independent, voluntary membership body for organizations that recognize, through specialty certification, the expertise of individuals practicing in engineering and related fields. Accreditation is earned by demonstrating adherence with CESB Accreditation Guidelines, including a robust review program of compliance with those standards.

## **I. Executive summary**

IHMM's comments may be summarized as follows:

1. IHMM supports EPA's continued retention of the PFOA and PFOS Maximum Contaminant Levels ("MCLs") and urges EPA to make clear in any final rule that those standards remain federally enforceable drinking water protections.
2. IHMM recognizes that some public water systems, particularly small, rural, and disadvantaged systems, may need additional time, funding, and technical assistance to achieve PFOA/PFOS compliance. However, any extension should be targeted, documented, transparent, and conditioned on meaningful interim public-health protections.
3. IHMM is concerned that EPA's proposed "exemption by rule" under SDWA § 1416 could become too automatic unless EPA preserves meaningful system-specific review, compliance milestones, public notice, and enforceable interim control measures.
4. IHMM urges EPA to require Tier 2 public notice, rather than Tier 3 notice, for systems operating under a PFOA/PFOS compliance exemption. A two-year delay in compliance with enforceable

PFAS drinking water standards is material information that consumers should receive promptly.

5. For systems with PFOA or PFOS results at or above 12 ppt, IHMM urges EPA to require at least one direct exposure-reduction measure, such as alternative water, certified point-of-use or point-of-entry treatment, or certified filtration devices. Public education and outreach are important but should not substitute for exposure reduction.
6. IHMM urges EPA to strengthen its administrative record supporting the proposed 12 ppt “unreasonable risk to health” threshold, particularly with respect to pregnant people, infants, children, and other sensitive populations.
7. With respect to EPA’s proposed rescission of regulatory determinations and related provisions for PFHxS, PFNA, HFPO–DA/GenX, PFBS, and the Hazard Index, IHMM recognizes EPA’s obligation to comply with SDWA’s procedural requirements. However, IHMM urges EPA not to leave a federal regulatory vacuum if the Agency concludes that the 2024 process was legally defective.
8. If EPA finalizes the rescission, EPA should immediately initiate a corrected SDWA process for PFHxS, PFNA, HFPO–DA/GenX, PFBS, and PFAS mixtures; preserve monitoring and public-disclosure requirements to the maximum extent permitted by law; clarify that states may retain or adopt more protective standards; and establish a clear timeline for renewed regulatory determinations.
9. EPA should expressly recognize that PFAS drinking water treatment generates treatment residuals that may require competent hazardous materials, waste management, and transportation oversight. EPA should encourage public water systems to use qualified environmental professionals in PFAS compliance planning and residuals management.

## **II. Comments on EPA’s Proposed Rescission Rule**

### **Docket ID No. EPA–HQ–OW–2025–0654**

EPA proposes to rescind the regulatory determinations and remove associated provisions for PFHxS, PFNA, HFPO–DA/GenX, and the Hazard Index mixture of PFHxS, PFNA, HFPO–DA, and PFBS. EPA states that the proposed action is based solely on an asserted legal defect in the sequencing of the 2024 rulemaking, not on any substantive reassessment of PFAS health risks, occurrence, or treatment feasibility.

IHMM appreciates EPA’s concern that rules issued under the SDWA must be legally durable. A drinking water standard that cannot survive judicial review does not provide stable public-health protection. Nevertheless, IHMM is concerned that full rescission of the affected regulatory determinations and standards, without a simultaneous corrective regulatory pathway, could undermine public confidence and delay meaningful risk reduction for PFAS contaminants that EPA has not determined are safe.

## **A. EPA Should Preserve the Public-Health Purpose of the SDWA While Correcting Any Procedural Error**

EPA's proposal is premised on the conclusion that SDWA § 1412 requires a sequential process: a preliminary regulatory determination, public comment, a final regulatory determination, and only then a proposed NPDWR, which may be published concurrently with the final regulatory determination. EPA now asserts that the 2024 PFAS NPDWR did not follow that sequence for PFHxS, PFNA, HFPO-DA/GenX, PFBS, and the Hazard Index.

IHMM does not object to EPA correcting a legal procedural defect where one exists. However, where the Agency has not withdrawn or repudiated the scientific concerns associated with these PFAS, the remedy should be carefully tailored. EPA should avoid creating the impression that rescission reflects a determination that the affected PFAS are not of public-health concern.

Accordingly, if EPA finalizes any rescission, IHMM urges EPA to state expressly that the action is procedural only and does not constitute a finding that PFHxS, PFNA, HFPO-DA/GenX, PFBS, or mixtures of these PFAS are safe in drinking water.

## **B. EPA Should Consider Alternatives to Full Rescission**

EPA should consider whether full rescission is the only lawful remedy for the asserted procedural error. IHMM urges EPA to evaluate and respond to the following alternatives in the final rule:

1. Re-propose the affected regulatory determinations and NPDWR provisions through the corrected SDWA sequence on an expedited schedule.
2. Stay the affected MCLs while preserving monitoring, reporting, and public-disclosure requirements.
3. Preserve analytical methods, sampling, occurrence-data collection, and Consumer Confidence Report disclosures to the maximum extent permitted by SDWA and EPA's independent information-gathering authorities.
4. Maintain the regulatory architecture necessary to support future re-proposal without forcing states, public water systems, laboratories, and compliance professionals to restart implementation planning from zero.
5. Establish a firm schedule for renewed regulatory determinations for PFHxS, PFNA, HFPO-DA/GenX, PFBS, and PFAS mixtures.

Full rescission may be administratively simple, but it is not necessarily the most protective or legally prudent remedy.

### **C. EPA Should Address Reliance Interests Created by the 2024 PFAS NPDWR**

Public water systems, states, laboratories, consultants, vendors, and environmental professionals have already devoted time and resources to understanding and preparing for the 2024 PFAS NPDWR. Even where compliance deadlines have not yet passed, regulatory standards influence capital planning, treatment evaluation, monitoring programs, procurement, public communications, state primacy work, and workforce development.

EPA should therefore address reliance interests in the final rule. A final rescission should explain how EPA will avoid wasting investments already made in PFAS monitoring and compliance preparation and how EPA will maintain continuity for systems that have begun planning for PFHxS, PFNA, HFPO-DA/GenX, PFBS, and Hazard Index compliance.

### **D. EPA Should Reconsider Its Anti-Backsliding Analysis**

EPA argues that SDWA's anti-backsliding provision does not apply because the affected provisions were unlawfully promulgated. EPA further argues that, even if anti-backsliding applies, rescission does not reduce existing public-health protection because the compliance deadlines have not passed.

IHMM urges EPA to strengthen and reconsider that analysis. A future compliance deadline may still provide present protection by driving monitoring, planning, public awareness, treatment design, and funding decisions. The existence of an enforceable federal standard changes behavior even before the compliance date. EPA should not assume that the public-health protection "actually provided" by an NPDWR is zero merely because the compliance deadline has not yet arrived.

If EPA finalizes the rescission, the Agency should explain how it will maintain comparable public-health protection through continued monitoring, public disclosure, technical assistance, state standards, or expedited re-proposal.

### **E. EPA Should Not Categorically Exclude Health-Risk Comments From Consideration**

EPA states that the rescission proposal is based solely on legal grounds and that comments on substantive health risks, occurrence, cost, or technical issues are outside the scope of the rulemaking. IHMM understands EPA's stated procedural theory. However, the rescission of drinking water standards has public-health consequences. Health-risk information is relevant to the appropriate remedy, the anti-backsliding analysis, reliance interests, and the reasonableness of EPA's decision under the Administrative Procedure Act.

IHMM therefore urges EPA to consider health-risk, occurrence, and treatment information at least to the extent such information bears on whether rescission is the appropriate remedy and what interim protections should accompany rescission.

#### **F. EPA Should Clarify State Authority**

If EPA finalizes rescission, EPA should make clear that states, territories, and Tribes may retain, adopt, or enforce more protective drinking water standards for PFHxS, PFNA, HFPO–DA/GenX, PFBS, and PFAS mixtures. EPA should also provide implementation guidance to primacy agencies so that rescission does not create unnecessary confusion in state regulatory programs.

#### **G. EPA Should Immediately Initiate a Corrected Regulatory Pathway**

If EPA concludes the 2024 regulatory process was procedurally defective, the proper public-health response is not regulatory abandonment. EPA should immediately initiate a corrected SDWA regulatory-determination process for PFHxS, PFNA, HFPO–DA/GenX, PFBS, and PFAS mixtures. IHMM urges EPA to include in the final rule a schedule for renewed action, including anticipated dates for preliminary determinations, public comment, final determinations, and any proposed NPDWR.

### **III. Comments on EPA’s Proposed Part 142 PFOA/PFOS Compliance Extension Rule**

#### **Docket ID No. EPA–HQ–OW–2025–1742**

EPA proposes to amend 40 C.F.R. Part 142 to establish a federal exemption framework extending the PFOA and PFOS MCL compliance deadline from April 26, 2029, to April 26, 2031, for eligible systems that submit a request. EPA relies on SDWA § 1416(f) and § 1450(a)(1), asserting authority to provide a streamlined exemption-by-rule process for public water systems in jurisdictions where the state, territory, or Tribe has not yet obtained primacy for the relevant PFAS NPDWR provisions.

IHMM supports reasonable implementation flexibility where public water systems face genuine capital, technical, workforce, or funding constraints. However, IHMM urges EPA to ensure that any extension is not merely an administrative delay, but a structured compliance pathway with enforceable milestones and meaningful interim health protections.

#### **A. EPA Should Preserve April 26, 2029 as the Default Compliance Date**

The 2024 PFAS NPDWR established enforceable MCLs for PFOA and PFOS. EPA’s proposed extension should not be read as weakening those standards. IHMM urges EPA to make clear that April 26, 2029 remains the default compliance deadline for systems that do not qualify for and obtain an exemption. A two-year extension should be available only to systems that demonstrate a documented need and commit to a specific compliance plan.

## **B. EPA Should Avoid an Overly Automatic Exemption Process**

EPA proposes that any exemption request satisfying the regulatory submission requirements is granted. IHMM is concerned that this structure could be viewed as too automatic and insufficiently individualized under SDWA § 1416.

IHMM recommends that EPA require, at minimum:

1. A certified statement of need signed by the owner or operator.
2. A compliance plan identifying major milestones for funding, engineering, procurement, construction, installation, treatment optimization, or alternative compliance measures.
3. Recent monitoring data for PFOA and PFOS.
4. A description of public communications already provided or planned.
5. A statement identifying the qualified professionals responsible for compliance planning, treatment evaluation, residuals management, and regulatory reporting.
6. EPA or Regional Administrator authority to deny, condition, or terminate an exemption where the submission is incomplete, unsupported, or inconsistent with public-health protection.

EPA should preserve the efficiency of a national framework while avoiding the legal vulnerability of a purely paper-based automatic extension.

## **C. EPA Should Require Tier 2 Public Notice**

EPA proposes Tier 3 public notice for systems operating under the exemption, while requesting comment on whether Tier 2 notice should be required. IHMM strongly recommends Tier 2 public notice.

Consumers should receive prompt notice when their water system is not meeting the otherwise applicable compliance deadline for PFOA or PFOS. PFAS contamination is a matter of substantial public concern, and a two-year delay in compliance with enforceable drinking water standards is material information for households, schools, health-care facilities, employers, and sensitive populations.

IHMM recommends that EPA require notice within 30 days of the exemption becoming effective, with annual updates thereafter. Notices should include:

1. PFOA and PFOS sampling results.
2. The reason for the exemption.
3. The system's compliance schedule.
4. Interim control measures.
5. Steps consumers may take to reduce exposure.

6. Contact information for the water system and relevant public-health authorities.
7. Plain-language explanation of potential health risks, including risks to pregnant people, infants, and children.

#### **D. EPA Should Strengthen the 12 ppt “Unreasonable Risk to Health” Record**

EPA proposes that systems below 12 ppt for PFOA and PFOS may receive the two-year exemption without additional interim control measures, while systems at or above 12 ppt must implement at least two control measures.

IHMM urges EPA to more fully justify the 12 ppt threshold in the final rule. EPA should explain why exposure above the 4 ppt MCL but below 12 ppt for two additional years does not present an unreasonable risk to health, particularly for sensitive populations. EPA should also address cumulative PFAS exposures from drinking water, food, consumer products, occupational settings, and environmental pathways.

IHMM does not oppose EPA’s use of a risk-based threshold for interim control requirements, but the final rule should include a more robust explanation of the scientific, legal, and public-health basis for 12 ppt.

#### **E. Systems at or Above 12 ppt Should Implement at Least One Direct Exposure-Reduction Measure**

EPA proposes six possible control measures: alternative water supplies, point-of-use or point-of-entry devices, pitcher filters, source water controls, public education, and community outreach. IHMM supports this menu but urges EPA to distinguish between measures that directly reduce exposure and measures that merely communicate risk.

Public education and community outreach are important, but they do not themselves reduce contaminant levels. IHMM recommends that EPA require systems at or above 12 ppt to implement at least one of the following direct exposure-reduction measures:

1. Alternative water supply.
2. Certified point-of-use or point-of-entry treatment.
3. Certified pitcher filters with replacement filters and instructions.
4. Source water control measures that demonstrably reduce PFOA/PFOS concentrations.

Education and outreach should supplement, not substitute for, direct exposure reduction.

## **F. EPA Should Require Practical Compliance Milestones During the Exemption Period**

The proposed rule should require exempted systems to demonstrate progress toward compliance. IHMM recommends that EPA require annual reports during the exemption period identifying:

1. Updated PFOA/PFOS monitoring results.
2. Funding applications and awards.
3. Engineering and design progress.
4. Treatment technology selection.
5. Procurement and construction status.
6. Interim control measures implemented.
7. Public notices issued.
8. Treatment residuals management planning.
9. Expected date of full compliance.

An exemption should be a bridge to compliance, not a pause in compliance activity.

## **G. EPA Should Address PFAS Treatment Residuals**

PFAS drinking water treatment may generate spent granular activated carbon, ion exchange resins, reverse-osmosis concentrate, filter media, and other residuals requiring proper handling, storage, transportation, treatment, destruction, or disposal. If residuals are mismanaged, PFAS contamination may be transferred from drinking water into waste streams, air emissions, wastewater, landfills, or transportation pathways.

IHMM urges EPA to address residuals management in the final rule and associated guidance. Public water systems should be encouraged to use qualified environmental, hazardous materials, and dangerous goods professionals to evaluate:

1. Waste characterization.
2. Storage and handling requirements.
3. Transportation obligations.
4. Disposal or destruction options.
5. Worker protection.
6. Emergency response planning.
7. Contractor oversight.
8. Documentation and recordkeeping.

PFAS compliance is not complete merely because contaminants are removed from drinking water. Responsible implementation must account for the full lifecycle of treatment residuals.

## **H. EPA Should Provide Additional Support for Small, Rural, and Disadvantaged Systems**

IHMM supports EPA's recognition that small, rural, and disadvantaged systems may face unique challenges, including limited rate bases, operator shortages, engineering constraints, funding delays, and procurement burdens. EPA should pair any final extension rule with technical assistance, model compliance plans, model public notices, procurement guidance, residuals-management guidance, and funding-navigation tools.

EPA should also encourage states and primacy agencies to prioritize assistance to systems with the highest PFOA/PFOS concentrations and the most vulnerable served populations.

## **I. EPA Should Clarify the Relationship Between Federal Exemptions and State Primacy**

EPA states that once a state obtains primacy, EPA will no longer be authorized to issue exemptions in that state, and states may decide whether to continue federal exemptions. IHMM urges EPA to provide clear guidance to avoid regulatory uncertainty.

The final rule should explain:

1. Whether and how existing federal exemptions continue after state primacy is obtained.
2. How states may adopt, reject, modify, or condition federal exemptions.
3. Whether states may impose more protective requirements.
4. How public water systems should proceed where state law does not permit exemptions.
5. How EPA will coordinate with primacy agencies during the transition.

Public water systems and the public need certainty regarding who is responsible for enforcement and what compliance deadline applies.

## **IV. The Role of Qualified Environmental Professionals**

Both proposed rulemakings highlight the need for competent implementation. PFAS drinking water compliance is not simply a laboratory or engineering issue. It involves environmental law, toxicology, sampling, treatment selection, waste and residuals management, public communications, procurement, operator training, emergency planning, transportation, and long-term regulatory compliance.

IHMM urges EPA to recognize in the final rule preamble, guidance, and technical-assistance materials that public water systems benefit from the involvement of qualified environmental professionals. Such professionals can help ensure that PFAS sampling is reliable, compliance decisions are documented, treatment residuals are lawfully managed, public communications are accurate, and regulatory obligations are met.

EPA should encourage systems to identify responsible, qualified professionals as part of exemption requests, compliance plans, and interim control-measure implementation. IHMM further believes that the IHMM CHMM and CHMP are constructed for just this purpose.

## **V. Specific Requests to EPA**

IHMM respectfully requests that EPA take the following actions in any final rules:

### **For Docket EPA-HQ-OW-2025-0654**

1. Do not finalize full rescission unless EPA simultaneously establishes a corrected regulatory pathway for PFHxS, PFNA, HFPO-DA/GenX, PFBS, and PFAS mixtures.
2. Clarify that rescission is procedural only and does not represent a finding that the affected PFAS are safe.
3. Preserve monitoring, occurrence-data collection, analytical-method capacity, and public-disclosure requirements to the maximum extent legally permissible.
4. Address reliance interests created by the 2024 PFAS NPDWR.
5. Strengthen EPA's anti-backsliding analysis.
6. Clarify that states may retain or adopt more protective PFAS drinking water standards.
7. Establish a public timeline for renewed regulatory determinations and, if warranted, re-proposed MCLGs and NPDWR provisions.

### **For Docket EPA-HQ-OW-2025-1742**

1. Maintain the PFOA and PFOS MCLs and make clear that April 26, 2029 remains the default compliance deadline.
2. Limit exemptions to systems that make documented, certified, system-specific showings of need.
3. Require compliance milestones during the exemption period.
4. Require Tier 2 public notice for systems operating under exemptions.
5. Strengthen the record supporting the 12 ppt threshold.
6. Require systems at or above 12 ppt to implement at least one direct exposure-reduction measure.
7. Require annual status reporting during the exemption period.
8. Address PFAS treatment residuals and encourage the use of qualified environmental professionals.
9. Provide clear guidance on federal-state primacy transitions.

## **VI. Conclusion**

IHMM appreciates EPA's work to address PFAS drinking water regulation under the Safe Drinking Water Act. The Agency's task is difficult: EPA must produce rules that are legally durable, technically

feasible, economically realistic, and protective of public health. IHMM supports lawful, orderly, and professionally implemented PFAS regulation. At the same time, IHMM urges EPA to ensure that procedural correction and implementation flexibility do not become a retreat from meaningful drinking water protection.

For the rescission rule, EPA should avoid creating a regulatory gap and should promptly pursue a corrected pathway for PFHxS, PFNA, HFPO-DA/GenX, PFBS, and PFAS mixtures. For the Part 142 compliance-extension rule, EPA should preserve PFOA/PFOS protections, condition any extension on documented need and interim controls, and require transparent public notice and enforceable progress toward compliance.

### **IHMM Professional Credentials**

The **Certified Hazardous Materials Manager® (CHMM®)** is an environmental professional who has demonstrated, through education, experience, and examination, the ability to identify and assess the risks of hazardous materials, mitigate or eliminate those risks, and manage their impact on human health and the environment. A CHMM provides proper controls for material handling, transportation, and security throughout the life cycle of hazardous materials, from design and production through storage, recycling, and ultimate disposal. They apply scientific knowledge, engineering technologies, and best management practices in compliance with U.S. regulatory requirements. We illustrate the hazardous materials compliance under 49 CFR and the risk management knowledge, skills, and abilities of the CHMM by including the CHMM blueprint in **Attachment One**.

The CHMM is accredited by the Council on Engineering and Scientific Specialty Boards [CESB] and by the American National Standards Institute [ANSI]. The measure of the quality and strength of a certification program is to evaluate its accreditation status. Accreditation is a form of certification for the certifying organization, requiring conformance with strict standards of validity, reliability, and impartiality. A key feature of IHMM credentialing programs, accreditation is essential because of the nature of work performed by IHMM certificants. The handling and management of hazardous materials and the transport of dangerous goods are governed by model regulations published by the US Environmental Protection Agency, US Department of Transportation, the U.S. Department of Labor, the Occupational Safety and Health Administration, as well as by the safety industry best practices regulations. Accredited credentials allow professionals to gain knowledge to use and implement these regulations, but to be recognized for their competency to properly manage and perform the functions of the profession.

The **Certified Hazardous Materials Practitioner® (CHMP®)** is a professional who has demonstrated, through education, experience, and examination, the ability to identify and assess the risks of hazardous materials, mitigate, or eliminate those risks, and manage their impact on human health and the environment. A CHMP provides proper controls for material handling, transportation, and

security throughout the life cycle of hazardous materials, from design and production through storage, recycling, and ultimate disposal. They apply scientific knowledge, engineering technologies, and best management practices in compliance with U.S. regulatory requirements. We illustrate the hazardous materials compliance under 49 CFR and risk management knowledge, skills, and abilities of the CHMP by including the CHMP blueprint in **Attachment Two**.

The CHMP is accredited by the Council on Engineering and Scientific Specialty Boards [CESB] and by the American National Standards Institute [ANSI]. The measure of the quality and strength of a certification program is to evaluate its accreditation status. Accreditation is a form of certification for the certifying organization, requiring conformance with strict standards of validity, reliability, and impartiality. A key feature of IHMM credentialing programs, accreditation is essential because of the nature of work performed by IHMM certificants. The handling and management of hazardous materials and the transport of dangerous goods are governed by model regulations published by the US Environmental Protection Agency, US Department of Transportation, the U.S. Department of Labor, the Occupational Safety and Health Administration, as well as by the safety industry best practices regulations. Accredited credentials allow professionals to not only gain knowledge to use and implement these regulations but to be recognized for their competency to properly manage and perform the functions of the profession.

**Recertification of Credentials.** After recognizing the strength of the content of the credential, and then its accreditation comes the requirements imposed by the certification body [IHMM] for the periodic recertification of the credential. IHMM requires that the CHMM and CHMP holders recertify their competency to continue to hold the credential every 5 years based on the contents of the certification blueprint. This ensures EPA and every public and private sector entity that relies on the professionals who hold these credentials, who are constantly upgrading their skills, knowledge, and abilities in their communities of practice.

**Training.** IHMM's commitment to the excellence of its professional credentials, and throughout DOT/PHMSA's work with employers, is the emphasis on the necessity of receiving training, and IHMM applauds the dedication to training and education as we stand behind and support our credential holders. IHMM has a Foundation, the Hazardous Materials Society [HMS] <https://hazmatsociety.org/> whose reason to exist is principally a focus on the education and training of IHMM's certificants.

Here <https://hazmatsociety.org/education-training/>, our certificants can easily find and take an extraordinary range of courses to upgrade and expand their knowledge, skills, and abilities.

If there are specific areas where EPA-required training can be made available to IHMM certificants, then we are pleased to make these resources available to all.

We appreciate the opportunity to offer IHMM's comments in this proceeding and again commit to working with EPA in every way possible to advance hazardous materials credentials that help create safer workers, safer communities, and a safer environment throughout the nation.

Sincerely,



Eugene A. Guilford, Jr., CAE  
Executive Director

**About the Institute of Hazardous Materials Management - <https://ihmm.org/>**

*Founded in 1984, the Institute of Hazardous Materials Management (IHMM), is a not-for-profit organization. IHMM has been protecting the environment and the public's health, safety, and security through the creation of credentials recognizing professionals who have demonstrated a high level of knowledge, expertise, and excellence in the management of hazardous materials, dangerous goods transportation, environmental protection, health, and workplace safety.*

*Over 18,000 homeland security, environmental protection, engineering, health sciences, transportation, and public safety professionals have earned IHMM's accredited **Certified Hazardous Materials Manager**<sup>®</sup> (CHMM<sup>®</sup>) credential. IHMM also administers the **Certified Hazardous Materials Practitioner**<sup>®</sup> (CHMP<sup>®</sup>), the **Certified Dangerous Goods Professional**<sup>®</sup> (CDGP<sup>®</sup>), the **Associate Hazardous Materials Manager**<sup>®</sup> [AHMM<sup>®</sup>], and the **Certified Dangerous Goods Trainer**<sup>®</sup> (CDGT<sup>®</sup>) credentials. IHMM also works with colleges and universities throughout the United States and, to that end, offers the **Student Certified Hazardous Materials Manager**<sup>®</sup> (ST/CHMM<sup>®</sup>) and **Student Associate Safety and Health Manager**<sup>®</sup> [ST/ASHM<sup>®</sup>] credentials. In 2019, IHMM acquired ISHM and now manages the **Certified Safety and Health Manager**<sup>®</sup> [CSHM<sup>®</sup>], **Certified Safety Management Practitioner**<sup>®</sup> [CSMP<sup>®</sup>], **Associate Safety and Health Manager**<sup>®</sup> [ASHM<sup>®</sup>], **Certified School Safety Specialist**<sup>®</sup> [CSSS<sup>®</sup>], and **Certified School Safety Manager**<sup>®</sup> [CSSM<sup>®</sup>] credentials.*

**Attachment One**  
**Certified Hazardous Materials Manager® [CHMM®]**  
**Certification Blueprint**



# CERTIFIED HAZARDOUS MATERIALS MANAGER (CHMM®) EXAM SPECIFICATIONS (BLUEPRINT)

Effective 2021

A Certified Hazardous Materials Manager (CHMM) is a professional who has demonstrated, through education, experience and examination, the ability to identify and assess the risks of hazardous materials, mitigate, or eliminate those risks, and manage their impact on human health and the environment.

A CHMM provides proper controls for material handling, transportation, and security throughout the life cycle of hazardous materials, from design and production through storage, recycling, and ultimate disposal. They apply scientific knowledge, engineering technologies, and best management practices in compliance with U.S. regulatory requirements.

The CHMM examination is a testing instrument designed to evaluate candidate’s minimal competency in the field of hazardous materials management. This Specification Blueprint is intended to offer guidance to candidates by outlining the domains and tasks that will be covered on the examination. The blueprint reflects the consensus of the profession validated via a survey of what hazardous materials managers do in practice. The Blueprint below describes the subject matter covered by the examination. All test items will be drawn from among the domain areas of the Specification Blueprint.

This Specification Blueprint lists below each domain and competencies with tasks given under each domain. A percentage label accompanies each domain in this Specification Blueprint. This percentage represents the proportion of the actual CHMM examination devoted to that domain. Tasks provide reference for activities conducted under each domain.

DOMAINS AND COMPETENCIES/TASKS	% of Exams
<b>1 Planning for Materials with Hazards</b>	<b>9.35</b>
1.1 Identify hazardous materials by name.	
1.2 Given four SDS, identify the hazardous material.	
1.3 Given a laboratory report (boiling point, classification, PH), identify the constituent that makes this mixture hazardous.	
1.4 Given a scenario about pollution prevention, identify the preferred strategy that should be used.	
1.5 Identify examples of effective recycling.	
1.6 Given a scenario involving pollution, identify the pollution impacts and the related regulations.	
1.7 Given a scenario about a Pollution Prevention Opportunity Assessment (PPOA), identify the elements and sequence of events.	
1.8 Given a scenario about hazardous materials and process, identify the impact to air.	
1.9 Given a scenario hazardous materials and process, identify the impact to water resources.	
1.10 Given a scenario hazardous materials and process, identify the impact to soil.	
1.11 Identify the characteristics of minor and major permits.	
1.12 Identify the characteristics of the permit application and permit review.	
1.13 Identify the characteristics of inspection, training, and waste requirements of permitting.	



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1.14 Determine the threshold quantity of a regulated substance in a process required to comply with EPA's risk management program regulation.	
1.15 Identify the components of Standard Operating Procedures (SOP).	
<b>2 Shipping and Transporting Hazardous Waste and Hazardous Materials</b>	<b>10.34</b>
2.1 Given a scenario about hazmat transportation, identify requirements.	
2.2 Given a scenario about packaging, identify the appropriate container.	
2.3 Given a scenario about transporting hazardous waste or hazardous materials and the method of transportation, identify the required labeling.	
2.4 Given a scenario about shipping domestically or internationally, determine how hazardous materials should be marked.	
2.5 Given a scenario, identify what information needs to be included in the shipping documents, and the proper shipping description format, and order of information.	
2.6 Given a shipment scenario, identify the required placarding.	
2.7 Identify conditions under which shipments, or portions of shipments, can be accepted or rejected.	
<b>3 Store Materials with Hazard</b>	<b>9.22</b>
3.1 Identify storage location site requirements for property containing hazardous materials/waste.	
3.2 Given a scenario about controlling inventory, identify the regulations that apply to that inventory.	
3.3 Given a scenario about storage of hazardous waste/material, identify the facility signage requirements.	
3.4 Given a scenario about storing a hazardous waste/material, identify proper container labeling requirements.	
3.5 Given a scenario about controlling access to hazardous materials/waste, identify how to control access.	
3.6 Given a scenario, identify how storage meets requirements.	
<b>4 Facility Operations Involving Materials with Hazards</b>	<b>9.12</b>
4.1 Given a type of hazardous material/waste, identify the engineering control that should be used to treat the material/waste.	
4.2 Given a type of hazardous material/waste, identify the engineering control that should be used to store of the material/waste.	
4.3 Given a type of hazardous material/waste, identify the engineering control that should be used to dispose of the waste.	
4.4 Given a scenario about a process, identify regulatory training record requirements.	
4.5 Given an SDS, identify the hazardous communication requirements that are needed for that material.	
4.6 Given a hazardous material, identify the PPE that should be used when sampling, handling, i.e., sweeping, shoveling, etc., the material.	
4.7 Given a scenario, identify the testing procedures needed to determine the hazard associated with the material.	
4.8 Given a hazardous material, determine health, safety, and security requirements.	
<b>5 Disposition of Materials with Hazards</b>	<b>8.46</b>
5.1 Identify typical components of a waste profile.	
5.2 Given a scenario about a waste material, identify the disposition options.	
5.3 Identify what a generator uses to qualify/disqualify a disposal facility.	
5.4 Given a scenario about a material (soil, chemical product, construction waste, etc.), identify the disposition requirements for the material.	





5.5 Given a scenario about the final disposition of a hazardous waste under RCRA, identify how final disposition is confirmed and documented.	
5.6 Given a scenario where there is a release from a container, identify how the release should be managed.	
5.7 Given a waste disposition scenario, identify how emissions (air) should be managed.	
5.8 Given a waste disposition scenario, identify how discharges (water) should be managed.	
<b>6 Record Keeping and Reporting</b>	<b>7.49</b>
6.1 Given a scenario about a spill of a hazardous material, identify the reporting requirements (timeframe, threshold reporting quantities, who receives the reports.)	
6.2 Given a scenario, identify the record keeping requirements for the relevant regulatory program (RCRA, EPCRA, TSCA, UST, CWA, CAA, CERCLA, HMTA, and SARA).	
<b>7 Training Personnel</b>	<b>8.07</b>
7.1 Given a scenario, identify the training requirements for the relevant regulatory program (RCRA, EPCRA, TSCA, UST, CWA, CAA, CERCLA, HMTA, SARA, and OSHA.)	
7.2 Given an activity involving materials with hazard, identify the competencies that would be needed for that activity (could include identifying hazards, determine if respiratory protection is needed, determine PPE needed, decontamination sequences, site worker needs a physical).	
7.3 Given a scenario about a job, identify the types of training that are required.	
7.4 Given a scenario about training, identify the assessment that should be used.	
7.5 Given a scenario about a Hazmat event when conducting drills and exercises, identify which types of agencies should be involved.	
7.6 Given a regulatory requirement, determine the adequacy of the training content and duration.	
<b>8 Response and Recovery</b>	<b>7.95</b>
8.1 Given a scenario about a spill or release, identify the chemical and physical hazards of the material, the quantity of material, and the location of the spill /release.	
8.2 Given a scenario about a spill or release, identify the amount of material that has been spilled or released.	
8.3 Identify the conditions that require the incident to be reported to the National Response Center.	
8.4 Given a scenario about a spill or release, identify how to mitigate the impact to receptors.	
8.5 Identify the steps to develop a recovery or incident action plan.	
8.6 Given an accident situation, identify data needed to investigate the cause of the incident.	
<b>9 Remediation</b>	<b>6.5</b>
9.1 Given a scenario about a spill or release, determine how to identify the constituents of concern, the vertical and horizontal extent of the constituents of concern, and the characteristics of the receiving media.	
9.2 Given a release scenario, determine the appropriate remedial objectives.	
9.3 Given a scenario about physical characteristics of a contaminant and a situation involving the contaminant, identify the treatment option that should be used to remediate the contaminant.	
9.4 Given a scenario about a remedial technology that was selected, identify the tools that should be used to ensure remedial action objectives are achieved.	
9.5 Identify capital and recurring costs (O&M costs) associated with a selected remedial action.	
9.6 Given a scenario and remediation technology, identify redevelopment considerations and pitfalls.	
9.7 Given soil analytical results, determine if the clean-up standard has been achieved.	





<b>10 Management Systems</b>	<b>6.58</b>
10.1 Given a scenario, identify which regulations would apply to a multi-media program.	
10.2 Given a scenario, identify the requirements for the maintenance and retention of records.	
10.3 Given a scenario, identify how the investigator can determine if a regulation is current.	
10.4 Given a scenario, identify knowledge needed to participate in regulation development.	
10.5 Given a scenario, identify the required interested parties and the process for the interested parties to communicate.	
10.6 Given a scenario, what are the required public outreach mechanisms?	
10.7 Identify elements of a management system audit and difference(s) from a compliance audit.	
10.8 Identify variables in a financial analysis.	
10.9 Given a scenario, describe operations that require a program.	
<b>11 Environmental Studies</b>	<b>6.35</b>
11.1 Given a scenario about a property transfer (sales or purchase of property), describe the required environmental due diligence.	
11.2 Given a scenario where lead-based paint, asbestos, and other regulated materials are thought to be present, describe how a building survey should be conducted.	
11.3 Given a regulatory framework, describe the required process and output.	
11.4 Given a scenario of analytical data, identify contaminants of concern.	
11.5 Given a scenario of a source of contamination, describe likely exposure routes.	
<b>12 Health and Safety</b>	<b>10.57</b>
12.1 Given a concentration of a contaminant of concern, identify exposure routes and susceptible populations that may be affected.	
12.2 Given screening thresholds, identify potential hazardous material exposure routes.	
12.3 Given a scenario, identify tasks to complete a job, the hazards of those tasks, and the control of those hazards.	
12.4 Determine process safety management.	
12.5 Identify recommended basic elements of an OSHA-compliant site safety plan.	
12.6 Identify recommended elements of an emergency response plan.	
12.7 Given the presence of hazardous materials, identify the appropriate containment.	
12.8 Identify labeling requirements for products.	

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*For more information about the Certified Hazardous Materials Manager certification program, including eligibility requirements and application procedures, see the IHMM [Candidate Handbook](http://www.ihmm.org) available at [www.ihmm.org](http://www.ihmm.org). If you have questions about the CHMM Blueprint, please contact M. Patricia Buley at [pbuley@ihmm.org](mailto:pbuley@ihmm.org).*



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**Attachment Two**  
**Certified Hazardous Materials Practitioner® [CHMP®]**  
**Certification Blueprint**



**CERTIFIED HAZARDOUS MATERIALS PRACTITIONER (CHMP®)  
EXAM SPECIFICATIONS (BLUEPRINT)**

*Effective Q4/2022*

A Certified Hazardous Materials Practitioner (CHMP) is a professional experienced in handling hazardous materials in a wide variety of specialties, such as safety, environmental protection and compliance, and transportation. The CHMP professional focuses on technical knowledge and expertise in handling hazardous materials.

A CHMP provides proper controls for material handling, transportation, and security throughout the life cycle of hazardous materials, from design and production through storage, recycling, and ultimate disposal. They apply scientific knowledge, engineering technologies, and best management practices in compliance with U.S. regulatory requirements.

The CHMP examination is a testing instrument designed to evaluate a candidate’s minimal competency in the field of hazardous materials management. This Specification Blueprint offers guidance to candidates by outlining the Domains and Tasks covered in the examination. The Blueprint reflects the consensus of the profession validated via a survey of what hazardous materials managers do in practice. The Blueprint below describes the subject matter covered by the examination. All test items come from the Domain areas of the Specification Blueprint.

This Specification Blueprint lists each Domain and Competencies with Tasks given under each Domain. A percentage of the exam accompanies each Domain in this Specification Blueprint. This percentage represents the proportion of the actual CHMP examination devoted to that Domain. The Tasks provide a reference for activities conducted under each Domain.

<b>DOMAINS AND COMPETENCIES/TASKS</b>		<b>% of Exams</b>
<b>1</b>	<b>Identification, Handling, and Transport of Hazardous Materials</b>	<b>35.58%</b>
1.1	Declarative -- Identify management, transport, treatment, and disposal regulations for hazardous materials	
1.2	Declarative -- Identify mandated training (Example: HAZWOPER training.)	
1.3	Declarative -- Identify the difference(s) between DOT hazardous material, EPA/RCRA hazardous waste, and OSHA hazardous substance	
1.4	Declarative -- Identify generator, transporter, and TSDF standards	
1.5	Declarative -- State criteria for identifying the characteristics of hazardous waste and for listing hazardous waste	
1.6	Declarative -- Identify standards for VSQG, SQG, LQG, and generators of Universal Waste	
1.7	Declarative -- Identify shipping papers, labels, markings, placarding, packaging, and record keeping requirements	



1.8	Declarative -- Identify standards for managing specific hazardous waste, standards for owners and operators of TSD, land disposal restrictions (LDR), and standards for universal waste management	
1.9	Declarative -- Identify waste minimization activities	
1.1	Declarative -- Identify waste record and reporting requirements	
<b>2</b>	<b>Management of Emergencies &amp; Incidents (E&amp;I)</b>	<b>18.46%</b>
2.1	Procedural - Given a scenario, determine resources needed to provide an HSP and emergency planning and training; include an employee right to know (RTK) and access to safety data sheets (SDS)	
2.2	Procedural -- Given a scenario about an incident, determine the size and role and responsibilities of the incident command system (ICS)	
2.3	Procedural -- Given a scenario, determine if record keeping and reporting are necessary according to state and federal regulations and requirements	
<b>3</b>	<b>Sampling and Analysis of Hazardous Materials/Waste</b>	<b>15%</b>
3.1	Declarative - Identify requirements of a Waste Analysis and Sampling Plan (WASP)	
3.2	Declarative - Identify how and when to use different types of direct-reading instruments, such as Draeger Tubes, OVA = Organic Volatile Analyzer, CGM = Combustible Gas Meter, FLID = Flame Ionization Detector, PID = Photoionization Detector	
3.3	Application - Given a scenario for a specific waste matrix, describe the sampling methods, sampling equipment, and sample preservation methods.	
3.4	Declarative - Identify how specific analytical results correlate to waste characterization and specific treatment standards	
3.5	Declarative - Identify standardized test methods used in waste characterization and/or determining DOT hazard class	
3.6	Declarative - Identify proper sampling procedures and pertinent sampling media for the establishment of appropriate administrative and engineering controls	
<b>4</b>	<b>Site Investigation and Remediation</b>	<b>14.04%</b>
4.1	Declarative - Identify potential physical or chemical hazards that may arise when a task is being performed and determine the engineering controls, administrative controls, and PPE requirements	
4.2	Declarative - Identify procedures to conduct a site investigation/assessment	
4.3	Declarative - Identify appropriate abatement methods based on investigation and risk assessment data	
4.4	Declarative - Identify site hazard characteristics and select appropriate administrative and engineering controls including PPE	
4.5	Declarative - Identify steps for long-term monitoring of hazardous waste	
<b>5</b>	<b>Program and Project Management</b>	<b>16.92%</b>
5.1	Declarative - Identify hazardous waste programs scope including managing cradle-to-grave responsibility	



5.2	Declarative - Identify requirements of the Hazard Communication Standard (HCS)
5.3	Declarative - Identify training requirements for hazardous materials for OSHA, RCRA, and DOT
5.4	Declarative - Identify OSHA training requirements for general requirements and respiratory protection

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