

REGULATORY UPDATE

| NOVEMBER 2021 |

WHAT TO EXPECT FROM THE REVISED ASTM PHASE I ESA STANDARD

The publication of the revised ASTM E1527 Standard Practice on Phase I Environmental Site Assessments (ESAs) is fast approaching. Compliance with this revised standard will affect the scope, reporting format and level of effort involved for future Phase I Environmental Site Assessments. Here are some highlights of what to expect:

Consistency on what defines a REC

• To improve consistency on what defines a recognized environmental condition (REC), the revision includes an augmented definition and new decision-tree style guide with examples.

· Contaminant Clarification

 Clarifications to how the presence of contaminants of emerging concern is classified under the ASTM standard.

· Report Shelf-Life

 Clarification that the 180-day or 1-year shelf life of the report begins from the date each task was conducted, and that those dates must be listed in the report.

Adjoining and Area Property Guidelines

• Expanded requirements and guidelines for evaluating uses of adjoining and area properties. The change will expand the level of effort currently expended by many consultants performing Phase I Assessments.

Expanded Requirements for HRECs and CRECs

- Any new exposure pathways (e.g., vapor intrusion) must be identified and considered for any historical REC (HREC) conclusions.
- Current onsite conditions must satisfy the current regulatory risk-based closure standard for HREC and controlled REC (CREC) conclusions.

Interpretation of CRECs

 Replacement of ambiguous property use limitation with more commonly used activity and use limitations, and clarification that other types of property use limitations (e.g. zoning) may be used to support a CREC conclusion.

Our priority is keeping our clients in a position to minimize their environmental liabilities while executing business-critical and time-sensitive transactions. If you would like to discuss how these revisions can impact your business, please contact your Langan project manager or:



Charlene Drake, LSRP, PG Associate <u>cdrake@langan.com</u> 215.845.8921



Christina Lewis Senior Project Manager <u>clewis@langan.com</u> 571.366.6847

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