LANGAN

REGULATORY UPDATE

| DECEMBER 2021 |

NOVEMBER 16, 2021 – ASTM INTERNATIONAL PUBLISHED E1527-21 STANDARD PRACTICE FOR ENVIRONMENTAL SITE ASSESSMENTS: PHASE I ENVIRONMENTAL SITE ASSESSMENT PROCESS

ASTM International published E1527-21 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process on November 16, 2021. When published, it became the effective standard of practice from ASTM for Phase Is. The changes were largely intended to provide clarity on definitions and consistency in scope and findings among providers of Phase I Environmental Site Assessments (ESA). Langan's November 2021 client advisory What To Expect from ASTM Standard provides an overview of key changes.

Phase I ESA users should be aware that:

- The publication date on the cover of your Phase I ESA report is typically not indicative of the start day for the report "shelf life."
- EPA may take up to a year to revise the E1527 reference in the all appropriate inquiry standards although ASTM E1527-21 may become standard industry practice first. Unless otherwise directed by you or your legal counsel/lenders, Langan will:
 - Continue to reference ASTM E1527-13 until early 2022
 - Incorporate references to both ASTM E1527-13 and ASTM E1527-21 until ASTM E1527-21 is officially adopted by EPA
- You will see changes to report formats and language and definitions for conformance to E1527-21. Your Langan project manager will reach out to discuss these changes prior to issuance of a report following our new standard format.

If you would like to discuss how these changes will impact your future projects, please contact your Langan representative or:



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