

Revisions to the ASTM E1527-13 Standard are Underway

Revisions to the current Phase I Environmental Site Assessment Standard (E1527-13 Standard) that was last updated in 2013 officially kicked off at ASTM Committee Week in San Diego in April. A Task Group responsible for developing and revising the E1527-13 Standard is composed of various environmental consultants, attorneys, bankers/investors, regulatory agencies, and users throughout the country. The Task Group has a common interest of improving the E1527-13 Standard and increasing consistency in the environmental due diligence process.

Over the past several years, the Task Group received feedback from the marketplace, environmental industry, and legal community regarding sections of the E1527-13 Standard needing clarification. The Task Group developed focus groups, with appointed legal liaisons, to tackle these areas needing clarification. Some of the areas identified include: limitations/data gaps; reasonable time; Activity Use Limitations predating current property owners; historical reviews; simplified definitions and examples of RECs, HRECs, and CRECs; Business Environmental Risk; and de minimis conditions.

The process for revising and updating a Standard is no easy task and requires the collaboration of the Task Group. The revisions to the E1527-13 Standard can take years to achieve since any proposed changes from the Task Group require approval from the United States Environmental Protection Agency to ensure the revisions meet or exceed the requirements of All Appropriate Inquiries. Most ASTM standards and guidance documents do not need EPA approval; however, E1527-13 is cited in federal regulations to meet All Appropriate Inquiries and the requirement must be met in order to satisfy one of the criteria to be eligible for CERCLA liability protection.

If you have an interest in becoming a Task Group member and/or want to participate in the revision process, I encourage you to get involved now while the Task Group is still in early conversations regarding the areas of the E1527-13 Standard that need improvement. Input from the User community is always needed.

You can register to become a member at <https://www.astm.org/COMMITTEE/E50.htm> or get more information by contacting the Chair of the ASTM 1527 Task Group, Julie Kilgore of Wasatch Environmental at jk@wasatchenvironmental.com. ■



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