

KEY CHANGES IN DUE DILIGENCE:

ASTM E1527-21 ENVIRONMENTAL SITE ASSESSMENT STANDARD

WITH THE UPDATE (E1527-21) TAKING EFFECT IN THE
COMING MONTHS, WE ARE HELPING OUR CLIENTS PREPARE
FOR RESPONDING TO STRONGER DEFINITIONS AND FIRMER
GUIDANCE WITHIN THE REFINED STANDARD.



Please reach out to the
following Geosyntec staff
regarding the new standard:

WEST COAST

Wendy Key

wkey@geosyntec.com | (916) 813-7445

ROCKY MOUNTAIN

Randy Brandt

rbrandt@geosyntec.com | (775) 307-0121

MIDWEST

Mark Willabee

mwillabee@geosyntec.com | (630) 203-3351

SOUTHEAST

Elaina Modlin

emodlin@geosyntec.com | (954) 562-6951

NORTHEAST

Julianne Bolton

jbolton@geosyntec.com | (410) 910-7665

MID-ATLANTIC & CAROLINAS

Kaitlyn Rhonehouse

krhonehouse@geosyntec.com | (910) 372-6402

NATIONWIDE & GLOBAL

Mark Johnson

mjohnson@geosyntec.com | (410) 382-4438

ASTM International has published an approved update to the Phase I Environmental Site Assessment (ESA) Standard (E1527-21) following three years of work by the environmental assessment, risk management, and corrective action committee (E50). Geosyntec practitioners were actively involved in the E50 committee, and the new Standard is now pending U.S. Environmental Protection Agency (USEPA) adoption for meeting the AAI Rule. Key changes that may affect our clients are:

- **Clarified terminology:** Recognized Environmental Condition (REC), Controlled Recognized Environmental Condition (CREC), and Historical Recognized Environmental Condition (HREC) definitions have been strengthened. A new appendix clarifies these terms to support decision-making.
- **New definitions:** Property Use Limitation (PUL) and Significant Data Gap are formally defined.
- **Historical records review:** This section has been updated to clarify subject property and adjoining property identification, use, and research objectives.
- **Site reconnaissance:** Additional requirements are included.
- **Deliverable:** Report requirements now include consistent use of the term “subject property,” identification of RECs, CRECs, and significant data gaps, photos of site reconnaissance items, and a site map.
- **Appendices:** The legal appendix, REC/HREC/CREC guidance, report outline, and discussion of business environmental risks (including emerging contaminants) have all been strengthened.
- **Liability defenses and emerging contaminants:** Users who wish to avail themselves of state liability defenses are advised to determine if their state includes PFAS or other emerging contaminants as “hazardous substances.” If so, users may request the contaminant be included in the Phase I ESA scope.

Purchase and download the update from ASTM International and contact us today: [Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process](#)