



ASTM E1527-21:

The changes and how they impact you

What you need to know about the 2021 ASTM Standard Changes

Summary

In November 2021, ASTM International revised the standard practice for a Phase I Environmental Site Assessment (ESA) for improved clarity, consistency, and usability. The Phase I ESA report identifies existing and potential environmental liabilities at a property.

What does this mean to you?

The new standard has “raised the bar” to improve report quality across the entire industry. AEI has met or exceeded the E1527 standard in all of its iterations. Our rigorous approach has resulted in a relatively seamless transition to the new E1527-21 standard. Changes and clarifications have been made to improve the overall report consistency and quality; however, AEI’s Phase I ESAs will remain the detailed and well-researched report you have come to expect.

AEI has been involved and at the forefront of all new developments with ASTM and emerging issues within the industry. We’ve taken an active approach to determining the potential impacts of emerging contaminants (particularly PFAS) on real estate. Additional information on PFAS and its potential risk to assets is available upon request.

AEI has organized the 2021 changes to ASTM 1527 for Phase I ESAs in a simple and clear manner. Below you will find the most notable changes and their impact on you.

Notable Changes:



Improved Consistency in Report Deliverables



Clarifying Language



Expanded Appendices

I. Improved Consistency in Report Deliverables

ITEM	OLD	NEW/IMPACTS
Historical Property Review		
Subject Property	Only as many sources as considered appropriate by Environmental Professional	Minimum of 4 sources unless specifically justified otherwise
Adjoining Properties	Limited research requirements	Same as subject property (minimum of 4 sources) The additional requirements include research and analysis of city directory listings for each adjoining property
Title Searches for Environmental Liens and AULs	Search date: last change in title	Title search for each parcel must date back to 1980 For many properties, this expanded requirement will require additional research and analysis
Report Figures and Photographs	Not specified	Required to include site figures and color photographs of significant features/RECs

II. Clarifying Language

ITEM	OLD	NEW/IMPACTS
Discussion of Opinions and Findings	-	The opinions shall specifically include the environmental professional's rationale for concluding that a finding is or is not a REC, HREC, CREC.
Significant Data Gaps	-	The report shall identify significant data gaps in the Findings section of the report. EP shall also comment on how the missing information impacts the EP's ability to identify RECs and if additional information may address this significant data gap.
HRECs	-	Clarifies the requirement of a multi-step approach required to classify a finding as a HREC

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II. Clarifying Language Continued

ITEM	OLD	NEW/IMPACTS
CRECs	-	<p>Clarifies the requirement of a multi-step approach required to classify a finding as a CREC</p> <p>“Property Use Limitation” (PUL) added as a new defined term</p>
Emerging Contaminants	N/A	<p>Adds emerging contaminants such as PFAS to the list of “non-scope issues”</p> <p>While Emerging Contaminants are currently considered a non-ASTM item (i.e., out of scope like mold or asbestos), chemicals like PFAS are expected to be identified as a “CERCLA hazardous substance” in the near future, in which case they would then need be evaluated as part of the ASTM standard. Due to the nature of chemicals such as PFAS, additional research and analysis for onsite and nearby sources and sites of concern will be conducted by AEI unless otherwise specified by the client</p>
Report Shelf Life	180-day viability was based on key report research dates	<p>Report viability dates and language clarified</p> <p>Exact 180-day report viability date will be calculated and clearly stated in the beginning of AEI's report</p>
“Likely”	The term “likely” was a point of confusion	<p>“Likely” clarified to represent something that is neither certain nor proven, but can be reasonably believed based on findings</p>
“Subject Property”	The site of the assessment did not have a name	<p>“Subject Property” is now the term for referencing the site of the assessment; AEI has always used this term</p>

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II. Clarifying Language Continued

ITEM	OLD	NEW/IMPACTS
Detailed Site Reconnaissance	-	Clarifying language added about the scope and objectives of the site visit to make it easier to understand
Government Databases	Existed	Names updated

III. Expanded Appendices

Several appendices of the 2021 version of ASTM 1527 were expanded, including the legal appendix and the addition of a discussion of emerging contaminants, which will provide useful legal background and technical information for these important issues.



AEI Consultants is a national consultancy providing building and environmental assessments and sustainability services to lenders, investors, owners, and occupiers of commercial real estate. AEI's core ideology is to help clients progress as responsible stewards of the built environment by upholding quality real estate assets for the betterment of people and our planet.

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