

ASTM E1527-21 & PFAS:

The right course of action

Is it mandatory? No. ASTM E1527-21 considers PFAS an “emerging contaminant” that is technically out of scope. Thus, a discussion of PFAS is not required. However, it can still be discussed in the report as a “non-scope” item. For instance, Asbestos-Containing Material and Lead-Based Paint are typical “non-scope” items that are regularly discussed in Phase I ESA reports.

Should you include it? Absolutely.

Here’s why: The new ASTM E1527-21, the latest standard for a Phase I Environmental Site Assessment (ESA), now includes a discussion of per- and polyfluoroalkyl substances (PFAS).

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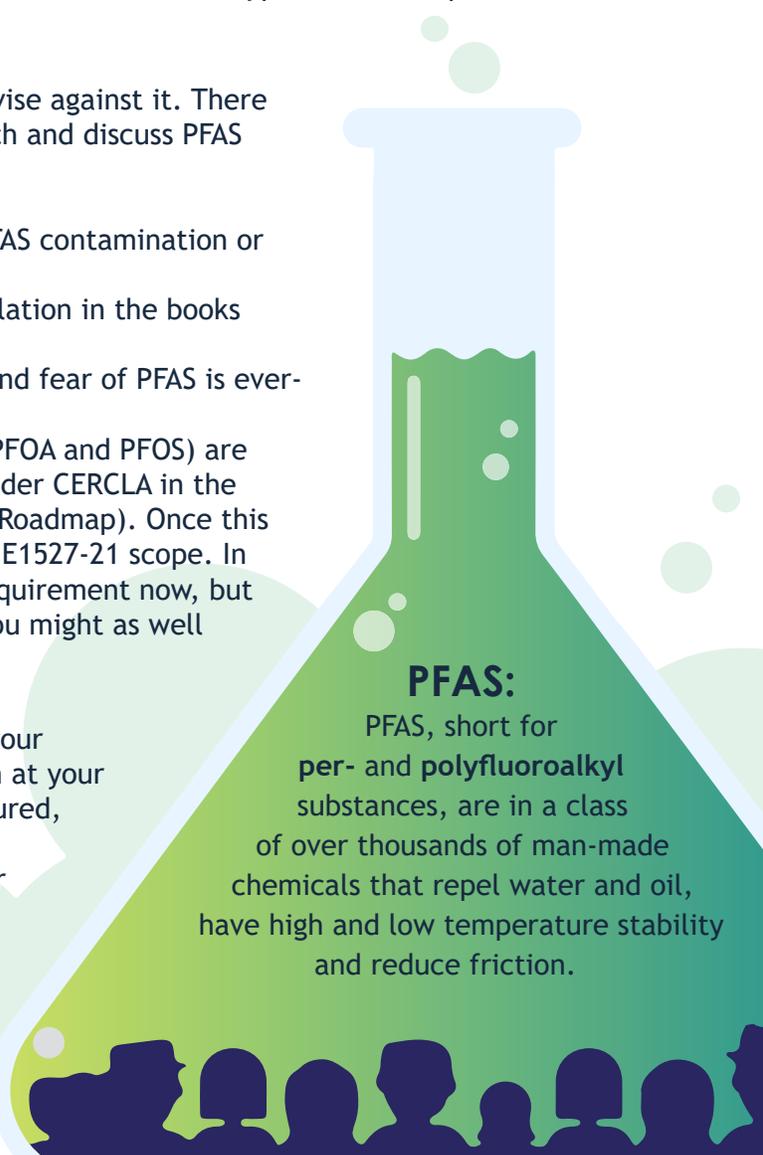
Here’s why: The new ASTM E1527-21, the latest standard for a Phase I Environmental Site Assessment (ESA), now includes a discussion of per- and polyfluoroalkyl substances (PFAS).

So, what does this mean for you? Are you required to discuss PFAS in Phase

- I ESAs?** No. ASTM E1527-21 considers PFAS an “emerging contaminant” that is technically out of scope. Thus, a discussion of PFAS is not required. However, it can still be discussed in the report as a “non-scope” item. For instance, Asbestos-Containing Material and Lead-Based Paint are typical “non-scope” items that are regularly discussed in Phase I ESA reports.
- Oh, phew! So, can you ignore PFAS?** We advise against it. There are several reasons why you should consult AEI to research and discuss PFAS contamination in the Phase I ESAs:
- A property’s value may be significantly impacted if PFAS contamination or perceived potential PFAS contamination is present.
 - State and local regulators actively put new PFAS regulation in the books every day!
 - High level of media coverage: the public awareness and fear of PFAS is ever-growing. With it comes increased scrutiny.
 - Two of the oldest and most widely researched PFAS (PFOA and PFOS) are scheduled to be classified as hazardous substances under CERCLA in the summer of 2023 (according to the EPA PFAS Strategic Roadmap). Once this happens, they will be considered as part of the ASTM E1527-21 scope. In other words, PFOA and PFOS contamination isn’t a requirement now, but they could become one in the summer of 2023. So, you might as well get ready!

So, what should you do now? Start by asking your consultant to assess the potential for PFAS contamination at your property and inform you of any major concerns. Rest assured, we are fully prepared with our [AEI PFAS Action Plan](#) to research and assess potential PFAS contamination on your property.

For more information, please contact us:
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PFAS:
PFAS, short for per- and polyfluoroalkyl substances, are in a class of over thousands of man-made chemicals that repel water and oil, have high and low temperature stability and reduce friction.

