

Phase I (1527-00) and AAI Compliant Phase I (1527-05) Comparison

Main Differences	Final AAI Standard / ASTM 1527-05	ASTM E1527-00
Definition of Environmental Professional	<ul style="list-style-type: none"> • Specific certification/license, education, and experience requirements • Applies only to individuals supervising all appropriate inquiries 	<ul style="list-style-type: none"> • No specific certification, licensing, education, or experience requirements • Applies to all individuals involved in conducting all appropriate inquiries
Interview with Current Owner and Occupants of the Subject Property	Mandatory	A reasonable attempt must be made to interview key site manager and reasonable number of occupants
Interview with Past Owner and Occupants	Interviews with past owners and occupants must be conducted as necessary to achieve the objectives and performance factors in §§ 312.20(e)-(f)	Not required, but must inquire about past uses of the subject property when interviewing current owner and occupants
Interview with Neighboring or Nearby Property Owners or Occupants	Mandatory at abandoned properties	Discretionary
Review of Historical Sources: period to be covered	From the present back to when the property first contained structures or was used for residential, agricultural, commercial, industrial or governmental purposes	All obvious uses from the present back to the property's first obvious developed use or 1940, whichever is earlier
Records of Activity and Use Limitations (e.g., Engineering and Institutional Controls) and Environmental Cleanup Liens	<ul style="list-style-type: none"> • No requirement as to who is responsible for the search • Scope of environmental cleanup lien search includes those liens filed or recorded under federal, state, tribal or local law 	<ul style="list-style-type: none"> • User's responsibility • The search results must be reported to the environmental professional • Scope of environmental cleanup lien search is limited to reasonably ascertainable land title records
Government Records Review	<ul style="list-style-type: none"> • Federal, state, tribal, and local • Records 	<ul style="list-style-type: none"> • Federal and state records • Local records/sources at the discretion of the environmental professional
Site Inspection	<ul style="list-style-type: none"> • Visual inspection of subject property and adjoining properties required • Limited exemption with specific requirements if the subject property cannot be visually inspected 	<ul style="list-style-type: none"> • Visual inspection of subject property required. No exemption. • No specific requirement to inspect adjoining properties; only to report anything actually observed
Data Gaps	Requires identification of sources consulted to address data gaps and comments on significance of data gap with regard to the ability of the environmental professional to identify conditions indicative of releases and threatened releases	<ul style="list-style-type: none"> • Generally discretionary; • Sources that revealed no findings must be documented.
Shelf Life of the Written Report	One year, with some updates required after 180 days	Updates of specific activities recommended after 180 days