

Due Diligence Services Consulting/Phase I ESA

- Phase I ESA
- SBA Phase I ESA/RSA
- Transaction Screen Questionnaire
- · Property Transfer Consulting
- Comprehensive Document Review and Regulatory Analysis
- Due Diligence Consulting
- HUD/NEPA
- Historical Reviews
- Area-wide Initial Site Characterization
- Phase I Peer Reviews

Phase II/Site Investigations

- Subsurface Soil Borings
- Soil, Water and Vapor Sample Collection and Analysis
- Geophysical Testing
- · Risk Analysis and Monitoring
- Groundwater and Soil Vapor
 Monitoring and Well Installation
- · Risk analysis and modeling
- Remediation design and risk management
- · Brownfields redevelopment
- Underground storage tank closure
- Petroleum Storage Tank Insurance Fund assistance
- · Vapor mitigation systems
- Removal and disposal of contaminated soils
- Disposal of abandoned hazardous wastes
- · Groundwater treatment and recovery



New Phase I Due Diligence Standard

The new standard for Phase I Environmental Site Assessments (E1527-21) was recently approved. The new standard takes into account best practices from environmental professionals and users to establish a more comprehensive document, also considering litigation claims arising from Phase I ESA disputes. The takeaways from the new standard include:



- Clarification and expansion on historical document review, interviews, and user provided information. As well as best practices for reviewing and making recommendations from the information provided.
- Further clarification on controlled recognized environmental conditions (CRECs) and additional requirements of the environmental professional to provide information regarding the CREC and conditions pertaining to the subject property.
- Further inclusion of non-Recognized Environmental Condition, Business
 Environmental Risks. Inclusion of substances not defined as Hazardous
 Substances under CERCLA through interpretation by EPA regulations and
 the courts, including PFAS and other "emerging contaminants".
 - Guidance on discussing these substances under Non-Scope
 Consideration to satisfy both federal and state requirements.

The current ASTM E1527-13 will remain applicable until the USEPA updates the All Appropriate Inquires (AAI) rule (anticipated up to a year). However, the new standard should also be compliant with the AAI rule.

Environmental Operations, Inc. (EOI) will begin implementing the new standard into all our due diligence projects beginning calendar year 2022. In the meantime, we are available to address any questions or concerns you may have regarding the implications of the new standard and your project. EOI provides solution focused approaches to environmental conditions. Our team prides itself on working closely with clients to develop creative solutions for solving complicated environmental issues, offering the best solutions for the project.