

ASTM Task Group Meeting News

The ASTM E 1527 Task Group met on January 27, 2010 to start the process of evaluating the standard and determine what options if any for the Task Group. ASTM requires that the standard be revisited on a recurring schedule, and if no action is taken to reapprove or revise the standard, then the standard sunsets at 8 years. The Sunset date would be November 2013 for E 1527.

There were four options presented for revising the standard. The first option is to make no revisions and consent to the sunset standard. The second option involves a re-ballot with no modifications; especially if the current market does not justify modifications then the Environmental Protection Agency (EPA) would only face a date change with this option. A third approach would be to create modifications that do not challenge the existing AAI rule. With this approach, the EPA would have to issue a propose rule, then permit public response and finally present a final rule. The last option would be to create modifications that directly challenge the AAI rule, in turn being the more difficult approach and process. Currently, the first and final options do not appear to be very popular amongst the Task Group Members.

Four marketplace suggestions on the E 1527 categories were discussed. The primary suggestion was for the Table of Contents to become a requirement to encourage consistency of reports. A second suggestion would be to include recommendations as part of the standard. The third suggestion was to reduce the size of the database reports, while still including all necessary environmental information. This suggestion would be attractive as a “Going Green” approach. A final suggestion that the current market has expressed interest in is requiring agency file reviews. In addition to the marketplace feedback, some other topics of discussed:

- Address handling of severe limitations when encountered, such as activity use limitations
- Access to property
- Clarify standard regarding past use
- Add storm water runoff to list of “out of scope” items
- Expanding interview requirements to off-site owners
- Requiring environmental professional to conduct site visit
- Clarify handling of historical recognized environmental conditions
- Clarify that user does not have to provide market value/sales price to environmental professional
- What is a reasonable time frame? 20 days?
- Clarify that “material threat” refers to future release

In conclusion, of the four options that were presented for revising the standard, the second and third options are most feasible involving either a re-ballot with a date change or modifications that do not challenge the existing AAI. All other suggestions nominated during this meeting will be considered by Task Group participants to aid in the decision making process. The EPA will work diligently with the Task Group with any proposed modifications of E 1527.

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