

Issue	ASTM E 1527-00	Final AAI Rule
<b>Environmental Liens on the Property</b>	The user is encouraged to check land title records for environmental liens.	The user <i>must</i> search for any environmental liens filed against the property.
<b>Data Gaps- an inability to obtain information required by the standards and practices despite a good faith effort by the EP or User</b>	The current standard contains very limited requirements for documenting data gaps.	Data gaps <i>must</i> be identified in the report, and the EP must provide an <i>opinion</i> as to whether those data gaps affect his or her ability to identify "conditions indicative of a release or threatened release" on the property. <i>Sampling is not required to fill data gaps.</i>
<b>Historical Records Search and Review</b>	The EP must search records back to 1940 or first developed use, whichever is earlier. The ASTM Standard identifies eight "standard historical sources" that should be reviewed.	The EP must search back to first developed use of the property. <i>i.e.</i> , as far back as "it can be shown that the property contained structures or from the time the property was first used for residential, agricultural, commercial, industrial, or government purpose." The EP is given substantial discretion in identifying which historical sources should be consulted.
<b>Objective of the Environmental Assessment</b>	To identify <i>RECs</i> .	To identify " <i>conditions indicative of releases or threatened release</i> " of hazardous substances or petroleum products, if such releases would pose a threat to human health or the environment.
<b>On-Site Reconnaissance</b>	The EP must indicate a failure to perform an on-site visit as a limitation of the assessment.	The visual on-site inspection must be conducted in all but a very few extraordinary cases. If the on-site reconnaissance cannot be performed, the EP must: (1) conduct the inspection by another method; (2) document his or her efforts to obtain access to the property; and (3) document other sources he or she consulted for information. (The inability to gain access to inspect a property was viewed by the reg- neg committee as a huge red flag.)
<b>Neighboring Site Reconnaissance</b>	The EP should view the surrounding parcels from the vantage point of the subject parcel.	The EP <i>must</i> view the surrounding parcels from the nearest vantage point.
<b>Interviews with Neighboring Property Owners</b>	Left to the discretion of the EP.	If the subject property is "abandoned," the EP must interview neighboring property owners.
<b>Interviews with Prior Owners or Tenants</b>	There is no requirement to interview past owners or tenants.	The EP <i>must</i> interview one or more of the following people if they are likely to have material information about RECs: 1) current and past facility members; 2) past owners, occupants, or operators of the property; or 3) employees of current and past occupants of the property.