



Field Notes

Conversations with a Phase I Provider

In her twelve-year career, Susan Cook has conducted and managed hundreds of Phase I ESAs and transaction screen assessments as well as over 1,000 Section 106/NEPA-related projects. A Phase I ESA department manager and senior project manager for ATC Associates in Novi, Michigan, Susan has conducted or managed projects for the Federal Emergency Management Agency (FEMA)/Department of Homeland Security (DHS), the U.S. Dept. of Housing and Urban Development (HUD), and Michigan State Housing Development Authority (MSHDA).

Read what this experienced professional says is the most rewarding aspect of her job, and learn why she covered her head during one memorable building inspection.

INDUSTRY VIEWS

ESA Report: What significant changes has the ESA industry undergone in the past five years?

Susan Cook: Significant changes include the implementation of EPA's All Appropriate Inquiry (AAI) rule and the subsequent revision of the ASTM E 1527 standard, the regular inclusion of non-CERCLA items in the Phase I ESA, on-line bidding systems, increasing competition and demands for faster turnaround times.

ESA Report: What has been the most significant effect of the federal AAI rule on your firm?

SC: The most significant effect I've noticed at the branch level is the increased time [we spend] educating clients about user responsibilities. In Michigan, we have not seen an increase in Phase I fees associated with the new

rule. As a nationwide company, ATC's experience seems to be consistent with general industry trends, and we have seen a willingness on the part of our clients to pay for increases in scope due to AAI.

ESA Report: What has been the most significant effect of the federal AAI rule on the industry as a whole?

SC: The most significant change is that most users have adapted their environmental due diligence standards and processes to include at least the core elements of AAI.

ESA Report: Where do you believe the industry will be in five years?

SC: I see an increase in speed and data integration between the consultant, the user and third parties assisted by technology and emerging data sharing standards like MISMO.

ESA Report: What concerns you most about the Phase I industry today?

SC: The lack of a national certification process for the Phase I discipline. On a day to day basis, increasing time and budget constraints are our biggest concern. In addition, there are some concerns regarding user awareness of what constitutes an AAI-compliant report and some consultants who are willing to do less AAI while claiming compliance.

ESA Report: Got any tips to share about drumming up—or retaining—clients?

SC: Many more clients are shopping around for the lowest pricing. It is not unusual for them to contact three or more firms for quotes or proposals. With so much competition, it is necessary to market [your services] in order to be considered for a quote. EPs can help retain clients by producing a quality product,

meeting deadlines and being as accommodating as possible. Personal contact on a regular basis is very important.

ESA Report: What's the single best thing a consultant can do to stay abreast of industry trends?

SC: Participate in continuing education and network with other environmental professionals.

PHASE I PRACTICE

ESA Report: What turnaround time is the typical client demanding for a Phase I? Is it sufficient?

SC: The typical turnaround time clients request is two weeks. In some cases, the timeframe is not sufficient to complete the necessary research, especially for properties with a history of regulatory issues.

ESA Report: What is the price range you charge for Phase I ESAs? What factors affect pricing the most?

SC: Our prices in Michigan range anywhere from \$1,800 to approximately \$5,000. The biggest factors influencing fees are the type and complexity of the property and any additional costs for sampling and analyses for issues like asbestos. Pricing varies greatly depending on the project and competition. Industrial properties are generally at the higher end; retail and vacant land at the lower end.

ESA Report: Has technology changed your Phase I practice?

SC: Technology has definitely changed the Phase I practice at ATC. Our computer network connects ATC's

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approximately 65 branch offices so we are able to communicate with colleagues much more efficiently. E-mail has become a powerful communication tool. Digital cameras allow us to download our site photographs right into the ESA report. Efficient color scanning allows us to provide clients with the complete ESA via e-mail, on CD, or via download directly onto a client's website. Having the complete ESA available in a PDF document has allowed us to reduce our paper consumption as well as the size of our hard copy storage. ATC's reports are available on our computers in a fraction of the time it has taken us to search for hard copies in our archives. We have also begun using a web-based platform for some reports.

ESA Report: What do you think of automated report-writing platforms?

SC: They are very useful for some projects; however, there is a learning curve. The biggest complaint from scientists is the loss of text if they forget to save when navigating between sections.

ESA Report: What local issues do you face that might surprise consultants elsewhere in the U.S.?



SC: In Michigan, the struggling automotive industry has greatly affected our market. Construction is down and commercial foreclosures are up. Our industrial base is shrinking. Competition between environmental firms is fierce. ATC has won projects by as little as \$5; it's scary.

ESA Report: If you perform peer reviews of other consultants' Phase I reports, what are some of the common shortcomings you identify? Your pet peeves?

SC: The most common shortcoming I identify is a failure to address data gaps and research a property adequately. Another is the failure to appropriately justify and document recognized envi-

ronmental conditions. Redundancy and open issues with no rational discussion are also pet peeves of mine.

ESA Report: Do clients typically ask for non-scope issues such as mold and asbestos investigations when they order a Phase I?

SC: Typically, ATC's ESAs include at least one non-CERCLA issue—asbestos and mold being the most common. Many ESAs also include lead-based paint, lead in drinking water, wetlands, flood plains and compliance surveys.

ESA Report: What impact do you think ASTM's impending vapor intrusion standard will have on the industry?

SC: It will be an important tool to further identify sites of concern and help make decisions regarding further investigation or mitigation.

ESA Report: Ever run into a meth lab?

SC: No. However, about five years after we conducted a transaction screen on a small motel, the authorities raided one of the rooms on the suspicion that a meth lab was operating there.

PERSONAL VIEWPOINT

ESA Report: How did you get into this industry?

SC: I first got into the environmental industry in college. I worked for a firm of geologists mapping mountains in the western part of the country.

ESA Report: Did your education prepare you for the job?

SC: The organization necessary for me to do well to earn a science degree in college helped prepare me for the skills needed to conduct ESAs efficiently. Writing classes helped prepare me to produce concise, well-written documents.

Chemistry classes helped me learn to interpret data and review subsurface investigations. When I started doing Phase Is, there was not much formal training involved; mostly we learned by actually doing the work with guidance from senior staff.

ESA Report: Do you remember your first Phase I ESA? Did you know what to look for?

SC: Intellectually I knew what to look for, but having no field experience, I had no idea how to go about it. There was definitely a disconnect between book knowledge and applying that knowledge to the actual field work.

ESA Report: What is the most rewarding aspect of conducting a Phase I ESA?

SC: Client satisfaction.

ESA Report: The most frustrating?

SC: Time and budget constraints.

ESA Report: What is the funniest (or most unusual) on-the-job memory you can recall?

SC: Many years ago, the representative of a religious denomination requested that I wear a head covering upon entering their structure for the inspection.

ESA Report: Got any advice for someone just starting out in the industry?

SC: Don't be afraid to ask questions. Be very organized and detailed. Read your drafts. ■

