

Environmental Consultant Vetting Guide

How to verify qualifications, evaluate experience, and avoid unqualified Phase I ESA providers

- ✓ EPA Environmental Professional qualifications explained
- ✓ Key certifications and licenses (PE, PG, CEP, ASTM-CEP)
- ✓ 10 red flags that indicate an unqualified consultant
- ✓ Sample vetting questionnaire you can send to providers

Who Is Qualified to Perform a Phase I ESA?

ASTM E1527-21 requires that a Phase I ESA be performed by or under the supervision of an Environmental Professional (EP) as defined in 40 CFR 312.10. This is a specific regulatory definition — not just anyone with environmental experience qualifies. The EP definition was established by the EPA to ensure that the person signing your Phase I report has the education, training, and experience to identify Recognized Environmental Conditions reliably.

EPA Environmental Professional Qualifications

A person meets the definition of Environmental Professional if they satisfy ANY ONE of the following:

Pathway	Education	Experience Required	Licensed?
Licensed PE or PG	Engineering or geoscience degree	3 years of relevant full-time experience	Yes — current state PE or PG license
Bachelor's + 5 years	Bachelor's (or higher) in engineering or science	5 years of relevant full-time experience	Not required
10 years experience	No degree requirement	10 years of relevant full-time experience	Not required

"Relevant experience" includes:

- Environmental assessments and investigations
- Environmental compliance auditing
- Environmental management or remediation
- Recognizing environmental conditions and identifying contamination indicators

The person who signs your Phase I report must meet the EPA's Environmental Professional definition.

If they don't, the report does not satisfy All Appropriate Inquiries, and you do not receive CERCLA innocent landowner protection. Ask for qualifications BEFORE contracting.

Key Certifications and Licenses

Certifications That Signal Competence

Credential	Issuing Body	Requirements	What It Proves
PE (Professional Engineer)	State licensing board	Engineering degree + 4 years experience + FE + PE exam	Highest engineering credential; legally authorized to stamp reports
PG (Professional Geologist)	State licensing board	Geology degree + experience + ASBOG exam	Geoscience expertise; critical for subsurface contamination
CEP (Certified Environmental Professional)	ABCEP (Academy of Board Certified Environmental Professionals)	Bachelor's + 5 years experience + written exam	Broad environmental competence; exceeds EPA EP definition
ASTM-CEP (Certified Environmental Professional)	ASTM International	3–5 years Phase I/II experience + exam	Specifically validates Phase I/II ESA competence
QEP (Qualified Environmental Professional)	IPEP (Institute of Professional Environmental Practice)	Education + experience + exam	Alternative to CEP with similar rigor
CHMM (Certified Hazardous Materials Manager)	IHMM	Education + experience + exam	Hazmat management expertise
LSP / LSRP (Licensed Site Professional)	State-specific (MA, NJ, CT)	State licensing requirements + exam	State-level remediation oversight authority

PE or PG license is the gold standard.

A licensed Professional Engineer or Professional Geologist has passed rigorous state exams, maintains continuing education, and is subject to state board disciplinary action for malpractice. When in doubt, hire a PE/PG.

Firm-Level Qualifications

Beyond individual credentials — what to look for in the firm

Firm Qualification	What It Means	How to Verify
Years in business	Established track record; firms with 10+ years have weathered market cycles	Ask directly; check state registration
Number of Phase I ESAs completed annually	Volume indicates expertise and efficiency	Request approximate volume per year
Professional liability / E&O insurance	Financial protection if the report misses a significant environmental condition	Request COI with coverage limits (\$1M+ minimum)
State-specific experience	Familiarity with local regulatory agencies, databases, and environmental history	Ask for references in the target state
Lender-approved status	Some lenders maintain approved consultant lists	Check with your lender before selecting a consultant
Environmental database provider	Quality of database reports affects Phase I thoroughness	EDR and GeoSearch are the leading providers
In-house technical capabilities	Firm can perform Phase II if needed, avoiding delays from re-mobilization	Ask if they perform Phase II, remediation design, etc.
SBA HUBZone, 8(a), WOSB, MBE, DBE status	Diversity certifications for government-funded transactions	Ask if relevant to your project

Ask your lender if they have an approved consultant list.

Many SBA lenders, CMBS servicers, and community banks maintain lists of pre-approved environmental consultants. Using a pre-approved firm avoids delays from lender review of the consultant's qualifications.

How to Verify Consultant Qualifications

Step-by-step verification process

Request the resume/CV of the Environmental Professional (EP) who will sign the report. Verify their qualifications meet 40 CFR 312.10 (PE/PG + 3 years, or BS + 5 years, or 10 years experience).

If the EP is a licensed PE, verify through the state licensing board's online database (e.g., NCEES provides a national search tool). If PG, check the state geologist licensing board. Confirm the license is active and in good standing.

Request proof of professional liability (E&O) insurance. Minimum \$1M per occurrence. The COI should name the insured firm and show current policy dates.

Ask for 2–3 sample Phase I reports (redacted for confidentiality). Evaluate:

- Does the report follow ASTM E1527-21 format?
- Are findings clearly categorized (REC, CREC, HREC, de minimis)?
- Is the historical research thorough (Sanborn maps, aerial photos, city directories)?
- Is the site reconnaissance well-documented with photographs?
- Are conclusions and recommendations clear and specific?

Check for disciplinary actions. State PE/PG boards publish enforcement actions. The ABCEP and ASTM certification bodies also maintain records.

Request client references — preferably from your transaction type (acquisition, refinancing, portfolio due diligence). Ask the reference: Did the consultant meet the timeline? Were there any surprises? Would they hire them again?

Confirm the consultant will use ASTM E1527-21 (not the superseded 2013 standard) and ask about their approach to vapor intrusion screening and emerging contaminants (PFAS).

10 Red Flags of an Unqualified Consultant

1 The person signing the report doesn't meet the EPA Environmental Professional definition.

Ask directly: "Do you meet the qualifications of 40 CFR 312.10?" If they can't answer clearly, walk away.

2 No professional liability (E&O) insurance.

A Phase I that misses a major environmental condition can cost the buyer millions. E&O insurance is the minimum financial backstop.

3 Uses the superseded ASTM E1527-13 standard.

ASTM E1527-21 has been the governing standard since the updated AAI rule took effect. A consultant still citing E1527-13 is not current.

4 Bargain-basement pricing (\$1,500 or less for a standard commercial site).

A proper Phase I requires 20–40 hours of professional time. At \$1,500, someone is cutting corners — shorter site visits, skipped interviews, limited historical research, or using unqualified staff.

5 No site visit or a drive-by site visit.

ASTM E1527-21 requires a thorough site reconnaissance including interior and exterior inspection. A consultant who performs a 20-minute drive-by is not performing a compliant Phase I.

6 Template reports with no site-specific analysis.

Every Phase I should contain site-specific findings, photographs, and analysis. If the report reads like a template with the address changed, the analysis is superficial.

7 Cannot explain the difference between REC, CREC, and HREC.

These are the fundamental finding categories under ASTM E1527-21. A consultant who conflates them doesn't understand the standard.

8 Doesn't address vapor intrusion.

While vapor encroachment screening (ASTM E2600) is technically optional under E1527-21, it's a recognized concern. A consultant who ignores vapor intrusion potential on a property near a dry cleaner or gas station is not performing a thorough assessment.

9**Won't discuss PFAS.**

PFAS is the emerging contaminant of the decade. While not yet a CERCLA hazardous substance for Phase I purposes, competent consultants address it as a non-scope consideration when the property is near airports, military installations, landfills, or firefighting training areas.

10**Pushes you toward a Transaction Screen instead of a Phase I.**

A Transaction Screen costs less but provides ZERO CERCLA protection. A consultant who recommends a Transaction Screen for a property acquisition is either uninformed about the legal implications or prioritizing their fee over your protection.

What to Expect in a Quality Phase I Report

Phase I ESA Report Quality Checklist

Report Section Checklist

- ☐ **Executive Summary** — Clear summary of findings, RECs/CRECs/HRECs identified, recommendations
- ☐ **Introduction** — Property description, purpose of assessment, scope of services, limitations
- ☐ **User-Provided Information** — Environmental liens, specialized knowledge, purchase price reduction for environmental issues
- ☐ **Records Review** — Environmental database report findings (radius search), regulatory agency records, historical records
- ☐ **Historical Use Information** — Sanborn maps, historical aerial photographs, city directories, topographic maps, building permits
- ☐ **Site Reconnaissance** — Detailed description of current conditions with photographs, interior and exterior
- ☐ **Interviews** — Owner, occupants, local government, neighbors (summarized)
- ☐ **Evaluation of Findings** — Analysis of all information gathered; assessment of each potential concern
- ☐ **Opinions and Conclusions** — Clear identification of RECs, CRECs, HRECs, de minimis conditions, or no RECs
- ☐ **Recommendations** — Specific next steps (Phase II sampling, monitoring, no further action)
- ☐ **Environmental Professional Statement** — EP's declaration of qualifications per 40 CFR 312.10
- ☐ **Appendices** — Environmental database report, historical records, photographs, regulatory correspondence, site plans

Missing any of these sections means the report may not comply with ASTM E1527-21.

The Environmental Professional Statement and the clear categorization of findings as REC/CREC/HREC/de minimis are the most commonly omitted — and the most important for your legal protection.

Sample Vetting Questionnaire

Phase I ESA Consultant Vetting Questionnaire — Send This Before Hiring

Copy and send these questions to any environmental consultant you're considering for a Phase I ESA. Their answers will tell you everything you need to know.

1. Environmental Professional Qualifications

- Does the person who will sign the report meet the EPA's definition of Environmental Professional per 40 CFR 312.10?
- What are their specific qualifications? (PE/PG license number + 3 years experience, BS + 5 years, or 10+ years experience)
- What professional certifications do they hold? (PE, PG, CEP, ASTM-CEP, QEP)

2. Firm Experience

- How many Phase I ESAs has your firm completed in the past 12 months?
- How many years has your firm been performing Phase I ESAs?
- Do you have experience in our state / metro area? How many Phase I ESAs in this area?
- Are you on any lender-approved consultant lists? If so, which lenders?

3. Standard & Scope

- Will the Phase I be performed in accordance with ASTM E1527-21?
- What environmental database provider do you use (EDR, GeoSearch)?
- Do you include vapor intrusion / vapor encroachment screening (ASTM E2600)?
- Do you address PFAS as a non-scope consideration when relevant?
- What historical records sources do you use (Sanborn maps, aerial photos, city directories)?

4. Insurance & Liability

- Do you carry professional liability (E&O) insurance? What are your per-occurrence limits?
- Can you provide a Certificate of Insurance?
- Do you carry general liability insurance?

5. Timeline & Deliverables

- What is your standard turnaround time from authorization to draft report?

- What is the rush / expedited turnaround time and additional cost?
- Do you provide a draft report for review before finalization?
- What format is the final report delivered in? (PDF, hard copy, both)
- How long do you retain Phase I records?

6. Pricing

- What is your fee for a Phase I ESA on [describe the property]?
- What is included in the base fee? What costs extra?
- Is the environmental database report included or billed separately?
- Are there additional charges for regulatory file review, vapor intrusion screening, or PFAS screening?
- What is your cancellation policy?

7. References

- Can you provide 2-3 client references from recent Phase I ESA projects?
- Can you provide a redacted sample Phase I report for our review?

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EnviVault

The most comprehensive directory of Phase I ESA environmental consultants in the United States

Search consultants at envivault.com