



# All Appropriate Inquiries: Environmental Professional

## What are “All Appropriate Inquiries”?

All appropriate inquiries (AAI) is the process of evaluating a property’s environmental conditions and assessing potential liability for any contamination.

## Why did the U.S. Environmental Protection Agency (EPA) establish standards for conducting AAI?

The 2002 Brownfields Amendments to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund, required EPA to promulgate regulations establishing standards and practices for conducting AAI. The AAI final rule was published in the Federal Register on November 1, 2005 (70 FR 66070) and went into effect on November 1, 2006.

## Who can perform AAI?

Many AAI-required activities must be conducted by, or under the supervision or responsible charge of, an individual who meets the definition of an “environmental professional.” The AAI final rule defines an environmental professional as someone who possesses the specific education, training and relevant experience necessary to exercise professional judgment to develop opinions and conclusions regarding conditions indicative of releases or threatened releases of hazardous substances on, at, in, or to a property, sufficient to meet the objectives and performance factors of the rule.

## Who qualifies as an environmental professional?

The final AAI rule includes specific educational and experience requirements for an environmental professional. The definition applies only to persons conducting AAI for the specific purposes outlined in the final rule. An environmental professional is defined as someone who has one of these qualifications:

- A state- or tribal-issued certification or license and three years of relevant, full-time work experience.
- A bachelor’s degree or higher in science or engineering and five years of relevant, full-time work experience.
- Ten years of relevant, full-time work experience.

## Qualifying as an environmental professional through certification or license requirements

For the purpose of AAI investigations, individuals can qualify as an environmental professional with a state- or tribal-issued certification or license and the equivalent of three years of relevant, full-time experience.

The certification and license requirements include and are limited to:

- A current professional engineer (PE) license.
- A current professional geologist (PG) license.
- A current license or certification from a state, tribe, U.S. territory or Puerto Rico to perform environmental site assessments or AAI, as defined in the AAI final rule.

Individuals who do not have one of these licenses or certifications can still qualify as an environmental professional through the educational and experience requirements outlined below.

## Qualifying as an environmental professional through educational requirements

Individuals who have a bachelor's degree or higher in engineering or science from an accredited institution of higher education and who have the equivalent of five years of relevant, full-time experience qualify as an environmental professional under the AAI final rule.

Individuals who do not meet the educational requirements can still qualify as an environmental professional through the experience requirements outlined below.

## Qualifying as an environmental professional through experience requirements

Individuals who do not meet the qualifications for an environmental professional outlined above can still qualify as an environmental professional if they have the equivalent of 10 years of relevant, full-time experience.

## What is the definition of relevant experience?

For the purposes of qualifying as an environmental professional under the AAI final rule, relevant experience is:

“Participation in the performance of environmental site assessments that may include environmental analyses, investigations, and remediation which involve the understanding of surface and subsurface environmental conditions and the processes used to evaluate these conditions and for which professional judgment was used to develop opinions regarding conditions indicative of releases of hazardous substances.”

## Can individuals who do not qualify as environmental professionals participate in the conduct of AAI?

Individuals who do not meet the environmental professional requirements can still participate in the conduct of AAI. However, they must work under the supervision or responsible charge of an individual who does meet the requirements.



## Hiring an environmental professional to perform AAI

When Brownfields decision-makers and grantees evaluate the capabilities of environmental professionals for AAI, the following qualifications should be considered:

- Does the individual who will supervise the AAI meet the minimum qualifications of an environmental professional as defined above and in the AAI final rule, Section 312.10?
- Does the vendor have experience performing Phase I and Phase II environmental site assessment activities, including interviewing owners, operators and occupants; reviewing historical sources of information and federal, state, tribal and local government records; performing visual inspections; conducting multimedia sampling and analysis; interpreting geologic, hydrologic, and chemical data; and preparing site assessment reports?
- Can the vendor demonstrate experience within the industry associated with the property being assessed (e.g., aerospace and defense, chemicals, electronics, energy, manufacturing, metals/mining, petroleum, pharmaceuticals, real estate, telecommunications, or transportation)?
- Is the vendor knowledgeable about federal, state, tribal and local environmental laws and policies, particularly those related to the industry of the property?

## Further information

For more information, visit the EPA Brownfields website at [www.epa.gov/brownfields](http://www.epa.gov/brownfields).

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