



Brownfields Department

GUIDE TO

Phase II Environmental Site Assessments

BROWNFIELD PROGRAM PROCESS



What is a Phase II?

A Phase II ("Phase II") Environmental Site Assessment follows a Phase I Environmental Site Assessment ("Phase I") that lists Recognized Environmental Conditions ("RECs") for a property.

A Phase II's goal is to determine the real impacts to the site from the RECs listed in the Phase I and determine if remediation is needed. If no RECs are found in the Phase I, then the site is ready to be redeveloped without a Phase II. However, if RECs are found, then a Phase II Environmental Assessment is recommended.

Phase II Environmental Assessments include soil and groundwater sampling, building materials sampling (looking for lead and asbestos), and sometimes removal of underground storage tanks.

What are the risks?

In many states, including Oklahoma, anyone who learns of contaminants that exceed state or federal limits for human health and the environment is obligated to report the event to the state environmental regulatory agency. This means that if contaminants are found during the Phase II over limits set by the OCC, **further action will be required.**

- At oilfield sites, the OCC Guardian Guidance sets limits. [See Guardian Guidance >>](#)
- At petroleum storage tank sites, the OCC Petroleum Storage Tank Division rules (**165:25-3-8** and **165:29-3-3**.) set limits. [See PSTD Rules >>](#)

Do I really need one?

If RECs are found in the Phase I, then a Phase II Environmental Assessment is recommended to investigate the real impacts to the property from the listed RECs. The OCC cannot require anyone to do a Phase II. The Phase II Assessment does not have to be conducted immediately and can even wait to be negotiated in a real estate transaction.

Does the OCC sample for all RECs?

No. The OCC can only look for and give liability relief for contaminants related to activities under our jurisdiction. We look for:

- BTEX (benzene, toluene, ethylbenzene, xylene)
- TPH (total petroleum hydrocarbons)
- RCRA 8 Metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver)
- lead-containing paint
- asbestos-containing materials

This means that if RECs related to hazardous materials are found, the Oklahoma Department of Environmental Quality should be included in decision-making.

What happens during a Phase II?

- Consultant writes a **Quality Assurance Project Plan** that must be approved by OCC, then EPA, before site work can begin
- Consultant drills 20-40' **temporary wells**, from which soil and water samples are taken
- Consultant coordinates **removal of the underground storage tanks** and takes more soil samples. The empty tank pit is backfilled with soil and covered with gravel
- Consultant hires licensed **asbestos and lead inspectors** to take samples of the building (walls, plaster, pipe coatings, flooring, etc.) to send to a lab
- Consultant compiles all information into a report and sends it to the OCC, who reviews it, approves it, and sends it to the landowner and applicant
- All drums and waste will be disposed of off-site. **Landowner will need to sign the waste generator forms before waste is hauled away.**

The only evidence left behind of the investigation is missing paint, caulking, etc., for building materials testing, plugged monitoring wells, and gravel over empty tank pit (if applicable).



Report: The final product of a Phase II Assessment is a Phase II Report. It may take 3-9 months from the completion of the Phase I to have a completed Phase II Report.



What does it cost?

- **FREE** - The OCC Brownfields Department has grant funds to pay for assessments at sites enrolled in our program with approval from EPA.
- **\$10,000 - \$100,000+**: For sites that are not enrolled in the OCC Brownfield Program, or for whom a Phase II Assessment has not been approved, the Phase II would need to be paid for by a non-OCC entity. They should expect to pay between \$10,000 and \$100,000+ depending on the size of the property, number of borings, contaminants tested for, and various other factors.
- To get a Phase II done privately, hire an environmental consulting company that conducts Phase II Environmental Site Assessments. A list of Licensed Environmental Consultants can be found on the OCC's website:
<https://oklahoma.gov/occ/divisions/petroleum-storage-tank/licensees.html>

For sites enrolled in OCC Brownfields, we contract the same consultant to conduct a Phase I and Phase II on a site.

We also generally begin Phase II work immediately after receiving results of the Phase I, unless requested otherwise. The only exception is sites requiring tank removal, for which Phase II's may only be conducted after the buyer takes ownership of the property.

How do I get an OCC Brownfields Phase II Assessment?

You must be enrolled in Brownfields and have your site work approved by our EPA grant Project Officer. Email or call us today to request our application packet.

ELIGIBILITY REQUIREMENTS:

- **Applicants** must have a credible reuse plan and have no prior involvement with on-site operations. For this reason, we usually do Phase I's and II's for cities, economic development authorities, and buyers.
- **A site** must have a suspicion of being impacted by activities under OCC jurisdiction -- namely petroleum storage tanks and oilfield exploration and production.

Sites that do not meet OCC requirements may be referred to the [ODEQ Brownfields Program](#).

Contact Us



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