



What to Keep and What to Drop: Managing Legacy Data in Brownfield CSRs

Georgia Brownfield Association Seminar

April 16, 2026

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Brownfield CSR Goal

Demonstrate Compliance with Risk Reduction Standards

Stars of the CSR

- Data table(s)
- Figure(s) of site with supporting sample locations / data
- Concise summary of analytical data and corrective actions to achieve RRS compliance

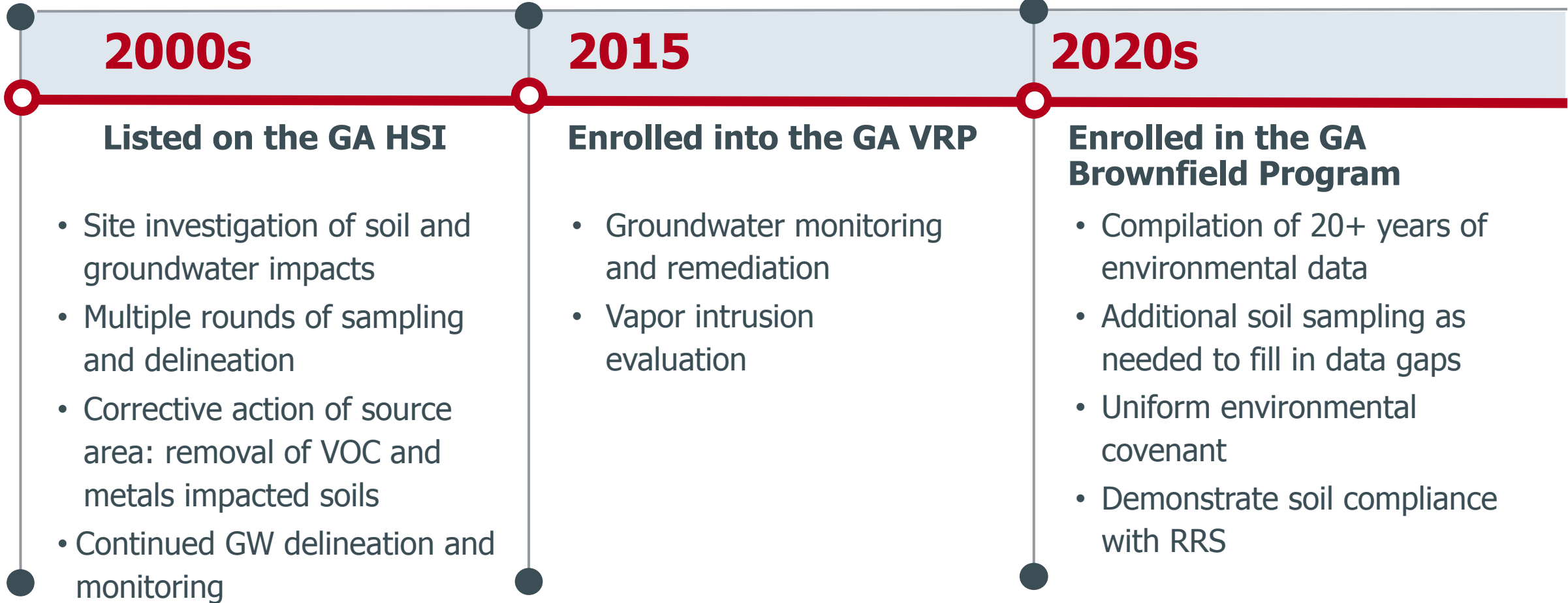
Example - Industrial Site



- Former manufacturing facility
 - Releases of VOCs and metals to soil and groundwater
- Current use – laydown and storage yard for adjoining commercial business

Example Site Timeline

HSI, VRP, Brownfield Program Events



Historical Data

Benefits

- Describe historical impacts
- Confirms corrective action success
- Informs additional data collection
- Potentially certifies compliance

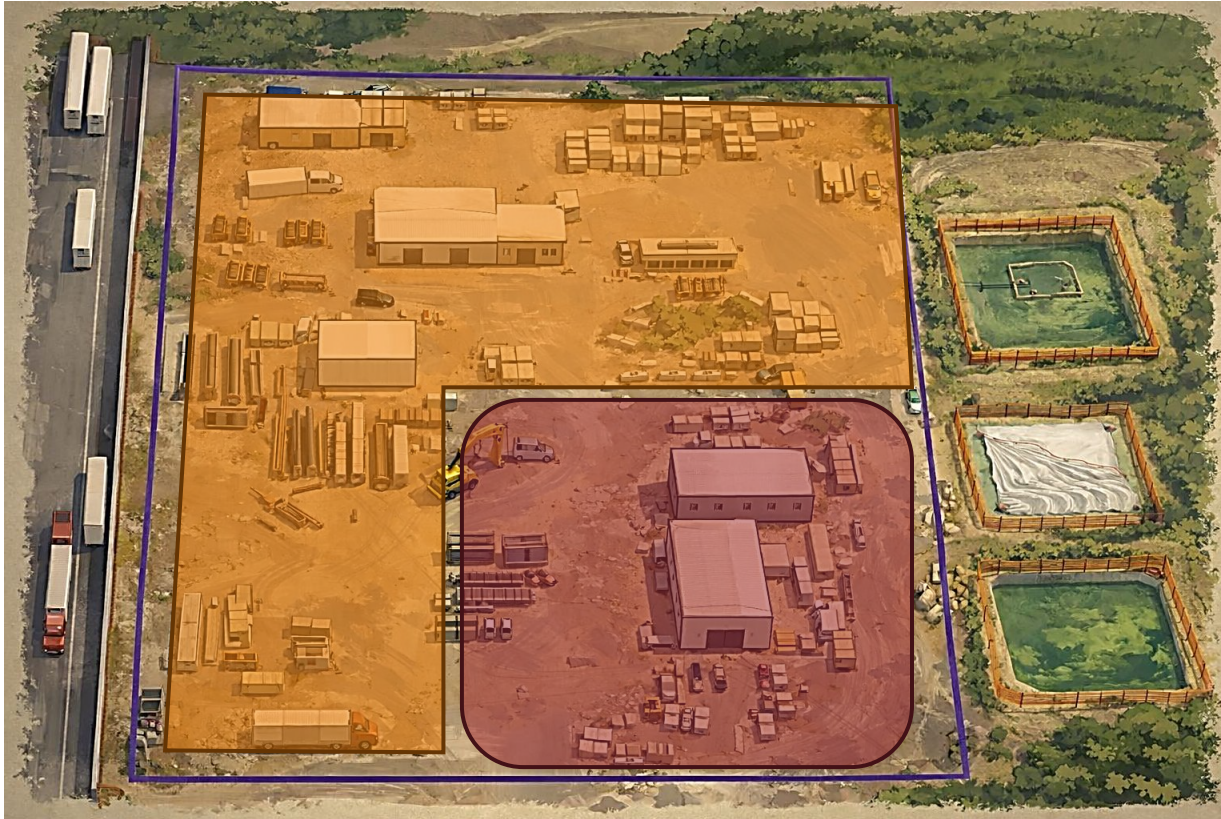
Information Sources

- Clients, current and previous property owners
- Regulatory records


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Review of Historical Data

- Summarize past assessment and remedial activities
- Determine compliance and/or status with other programs
- Identify and fill in data gaps
- Informs new data collection
- Shows trends
 - ❖ Groundwater - leaching pathway and VI
 - ❖ Soil gas - VI



 Historic impacts, assessment, and remediation

 Remainder of site with little or no data

Historical Data Challenges & Risks

QA/QC of historical data

- Age of data
- Availability of laboratory reports – incomplete report appendices
- Outdated laboratory methods or reporting limits

Risks

- Validity of data collected by others
- Potentially incomplete
 - Partial analyte list
 - Groundwater data with no soil data above
- Seasonal impacts
- Comparable with current data



Things to Avoid

Don't include

- Data dump
- Unnecessary information or detail
- References to old / outdated RRS

Instead

- Create new table(s) screening data to current RSLs
- Include historical and new data that demonstrates compliance with RRS
- Carve out data from material that was removed from site



Recipe for Success

- Include all analytical reports for samples used to certify compliance.
- Data from historical reports can be referenced in the text.
- Full reference list can be included.
- Data are only part of the property history.
- Use the narrative to enhance the story.

