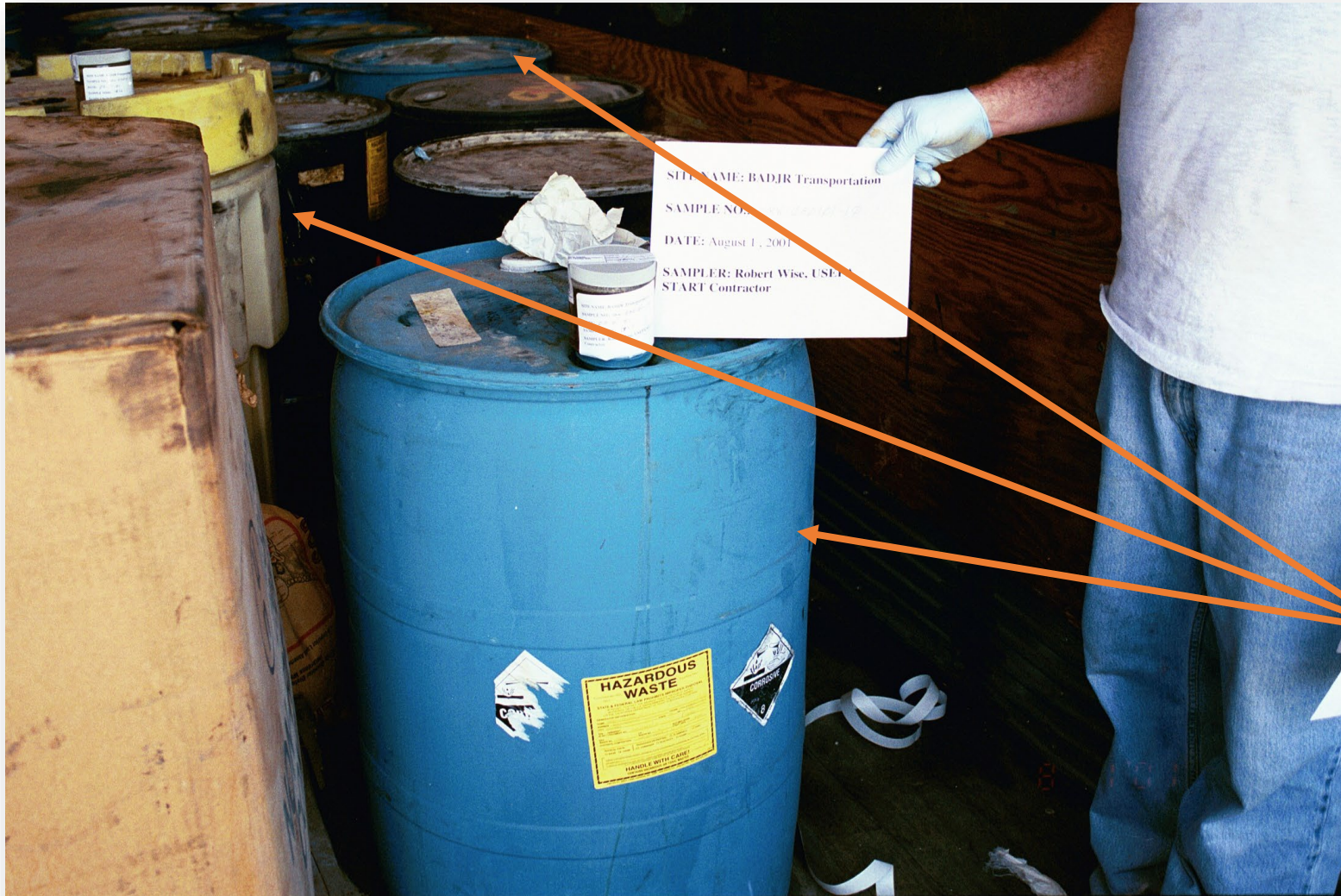




Enforcement Sampling



General Rules on Enforcement Sampling



Conduct a thorough inventory of all containers in the location that are part of the investigation. The inventory should include the following:

- type of containers
- construction of container
- physical integrity of the container
- contents of the container if known
 - info on the drum.



General Rules on Enforcement Sampling



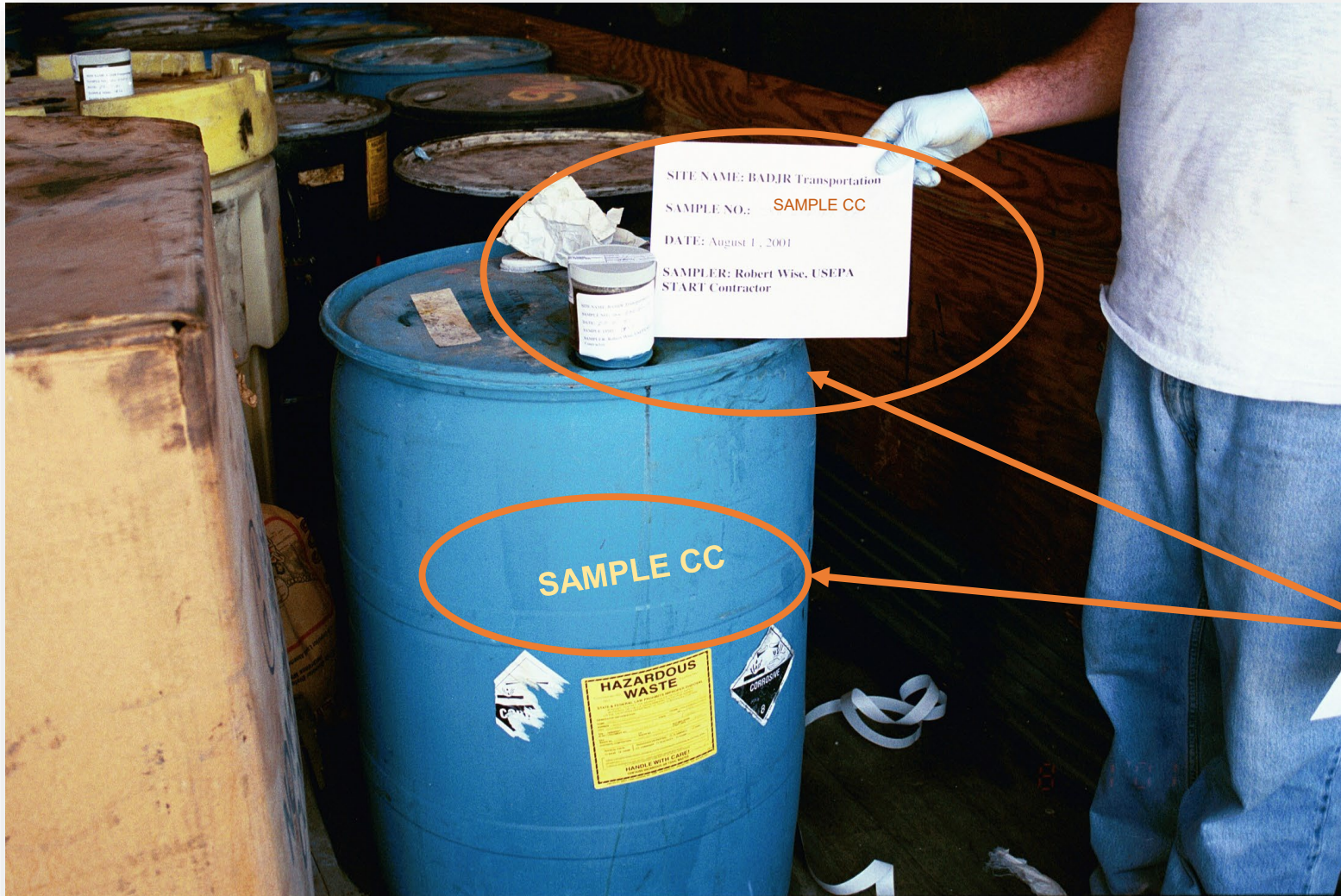
Note whether the marking on the container are:

- hazardous waste
- DOT Label
- Universal (pictorial) labeling
- Handwritten letters indicating the contents

Make sure to copy all information on the container!



General Rules on Enforcement Sampling



Place an inventory/sample number on the drum above the hazardous waste mark or some other visible location. Use a color that stands out from the drum.

All the inventory information, photo logs and sample information will be tied to this number.



General Rules on Enforcement Sampling



If sample is to be field analyzed, collect separate laboratory and field analytical samples.



Collect samples using proper protocol.



General Rules Enforcement Sample Photography

- Photograph:
 - all sides of the container
 - the information (each mark, label, or writing) on the container up close and individually.
- Maintain a photo log that corresponds the drum inventory number to the photos. Included descriptions of the photos in the log when the picture is taken.
- Upon completion of the sampling event, take a photo of the sample on the drum or container. Try to include inventory number, marks or labels in the picture.



General Rules Enforcement Sample Photography



- During enforcement sampling involving law enforcement, do not take any photos of the actual sampling activities (i.e. no action photos).
- If action video is to be collected for training purposes, state so in the audio of the tape.



General Rules Enforcement Sample Photography

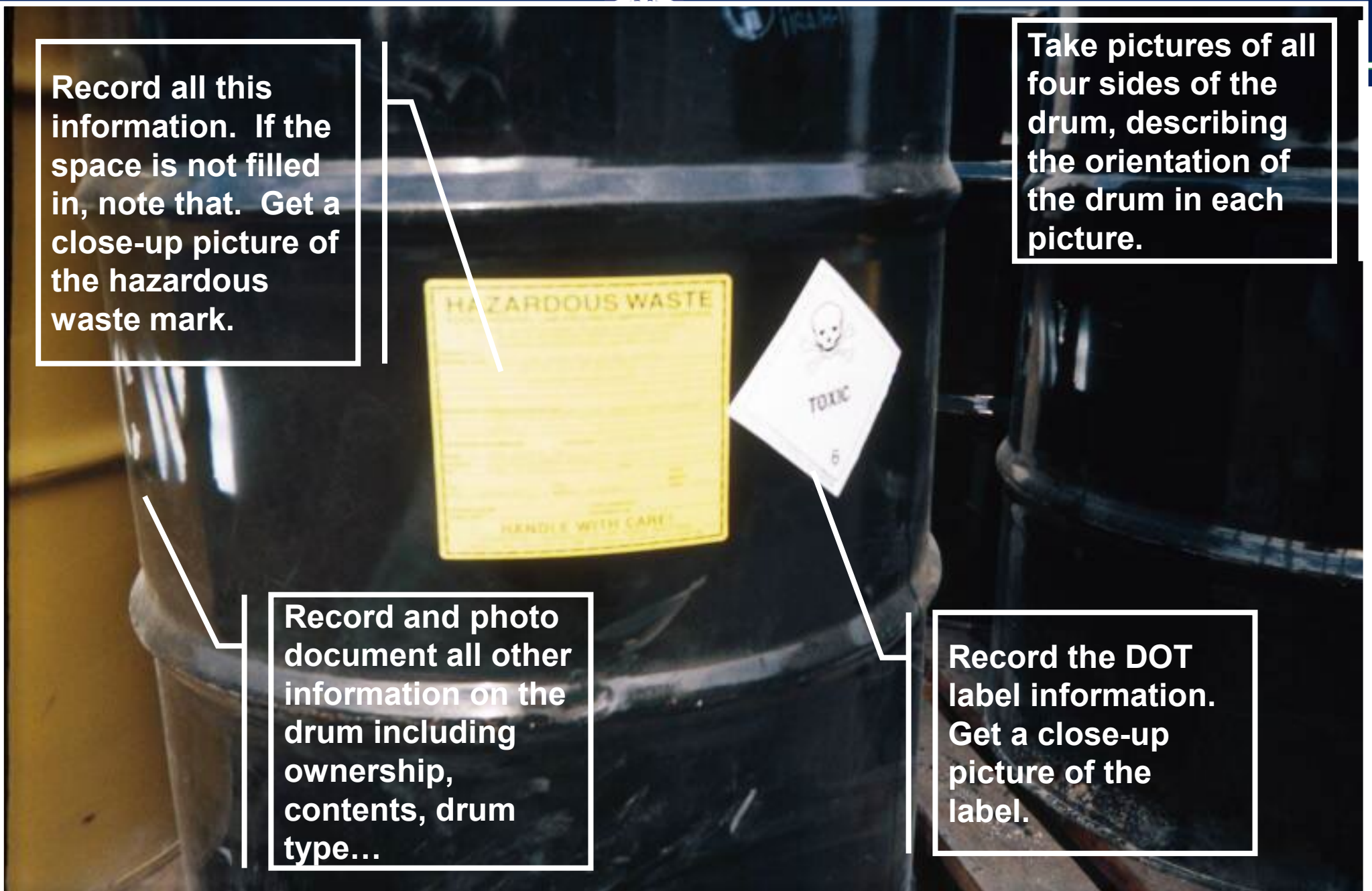
- **DO NOT USE PERSONAL CAMERAS OR PHONES TO TAKE ENFORCEMENT PICTURES!**
- **If you use your personal camera or phone you are opening everything on the device up for discovery especially in Federal court.**

Record all this information. If the space is not filled in, note that. Get a close-up picture of the hazardous waste mark.

Take pictures of all four sides of the drum, describing the orientation of the drum in each picture.

Record and photo document all other information on the drum including ownership, contents, drum type...

Record the DOT label information. Get a close-up picture of the label.





Proper photo documentation of a drum with an enforcement sample.



DOCUMENT EVERYTHING
But, for your sake, don't over
document



Example: Information for Inventory

Drum Type: 55-gallon, fiber, open top drum. Approximately 20% full.

Condition: Poor condition with numerous holes

Information on drum: Hazardous Waste Mark (record all info on mark), DOT label, Manufacturer information, spray painted information

