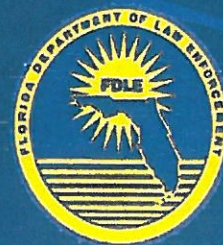
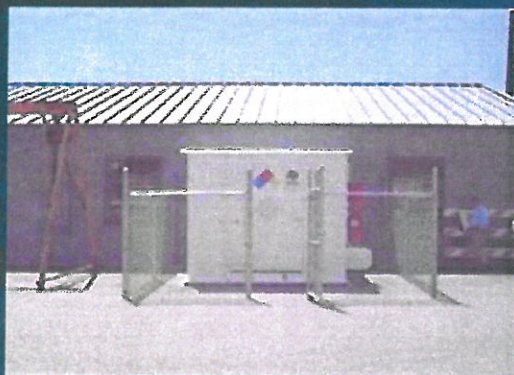
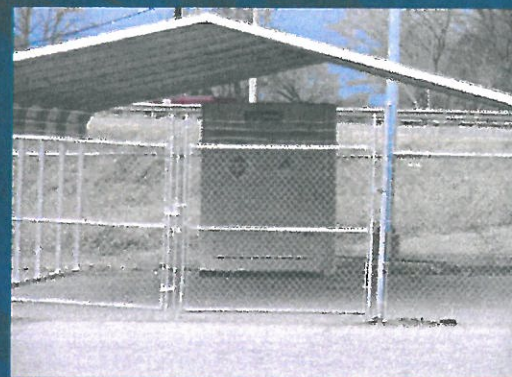


8/10/12

DEA CLANDESTINE DRUG LABORATORY CLEANUP PROGRAM



CONTAINER PROGRAMS



Current States with Container Programs

- Alabama
- Illinois
- Indiana
- Kentucky
- Tennessee
- Oklahoma



Why consider the container program?

- Expedited removal of seized chemicals
- Minimize time and fiscal resources
- Minimize Agency's liability
- Useful tool for small/remote cleanups



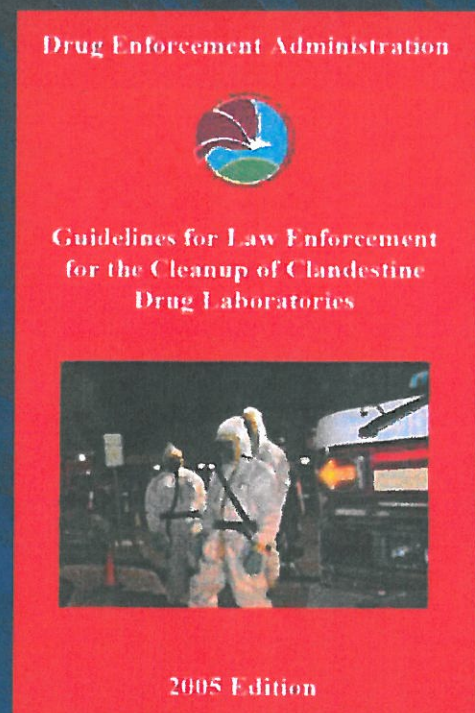
Why do I have to use the container program?

- Law Enforcement responsibility to public safety and crime prevention
- Guidelines outlined in the DEA Red Book
- Law Enforcement becomes the “generator” of any hazardous waste removed as a result of seizing and dismantling a clandestine lab



Guidance Document

- Guidelines for Law Enforcement for the Cleanup of Clandestine Drug Laboratories – 2005 Edition
- AKA “Red Book”
- Electronic version located on the DEA public website:
www.dea.gov



Generator – 40CFR 260.10

- A Hazardous Waste Generator:

Any person, by site, whose act or process produces hazardous waste identified or listed in the 40 CFR part 261 or whose act first causes a hazardous waste to become subject to regulation.



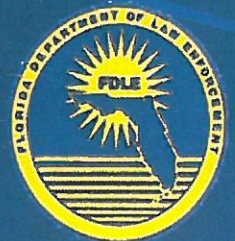
Applicable Regulations

- EPA's Hazardous Waste Regulations
(40 CFR Parts 260 et seq.)
- OSHA's Safety and Health Regulations
(29 CFR 1910.120 and 1910.1200)
- DOT's Hazardous Material Transportation Regulations
(49 CFR Parts 100 et seq. and Parts 350 and 399)
- Controlled Substances Regulations
(21 CFR Parts 1300 et seq.)



Applicable Exemptions

- 21CFR 1301.24 – Law Enforcement Exemption for transporting Controlled Substances
- 49CFR 171.1(d)(5) – Federal, State or Local government employees not subject to DOT Hazardous Materials Regulations
- 40CFR 261.5 – Conditionally Exempt Small Quantity Generator (CESQG), < 100kg or 220lbs HW per month

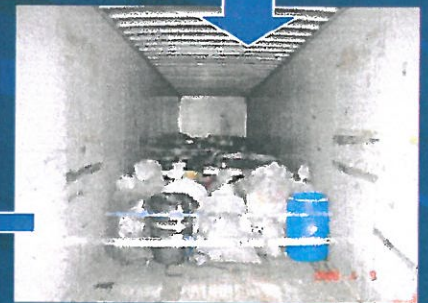


EPA ID NUMBERS

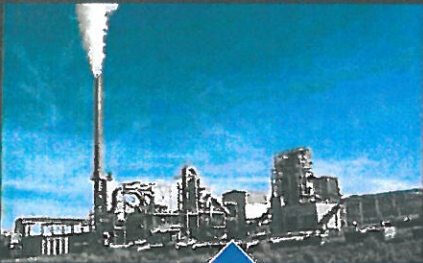
- Not Required by DEA – Check with your State Environmental Regulatory Officials
- Site Specific to a geographic location
- Pro's – allows greater flexibility for HW handling (i.e. consolidation, lab packing, bulking, and increased waste capacity)
- Con's – increased liability and requirements (i.e. tracking, reporting, possible fees and closure requirements)



"Cradle to Grave"...



Protect Your Liability!

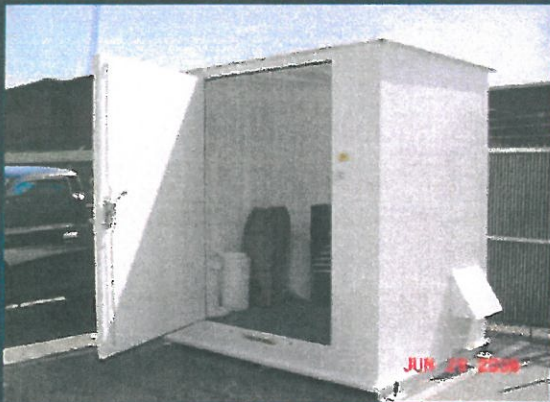


Container Program

Storage Containers & Equipment



Hazmat Storage Container

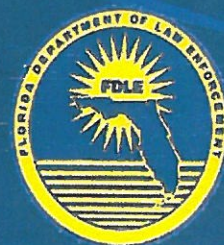
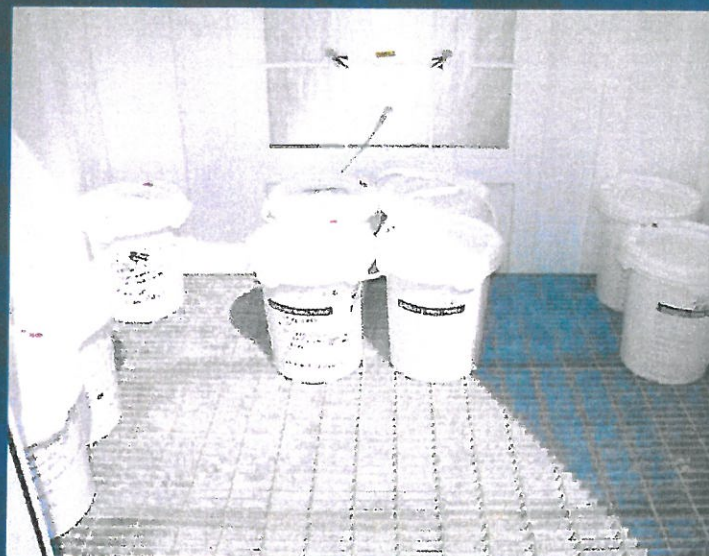
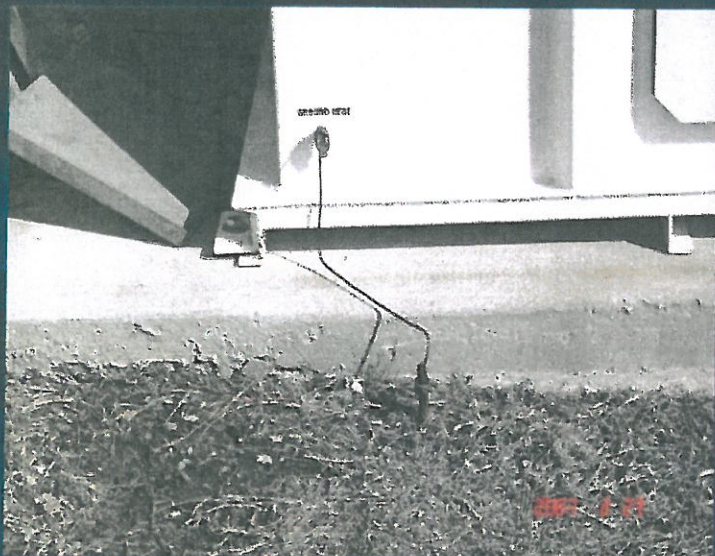


Requirements - Storage

- Container placed on a level hardstand, away from the property line and grounded.
- Electric hookup may be required
- Approvals may be required from:
 - State Environmental Officials
 - Local Fire Department
 - 100 year flood plain designations



Proper Storage

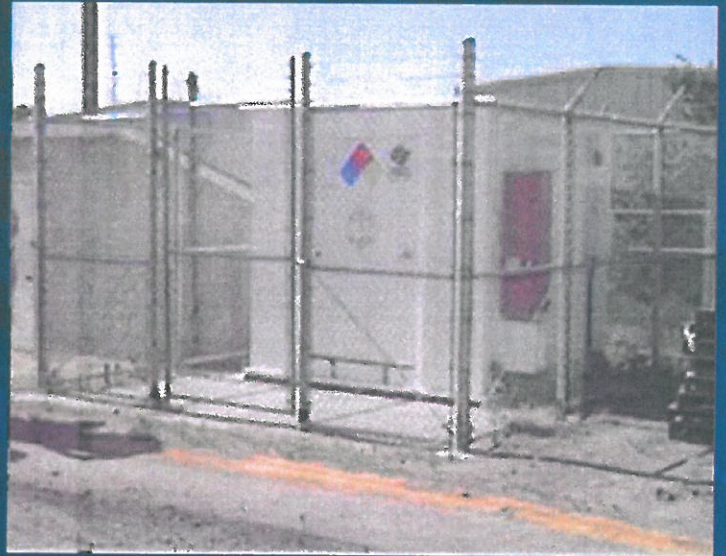


Requirements - Security

- If location is staffed 24/7 (i.e. police stations, highway patrol post), only required to be locked with a padlock.
- If not, a 6ft perimeter fence, and two out of three of the following:
 - locked with written key control policy
 - intrusion detection system
 - closed circuit video monitoring system



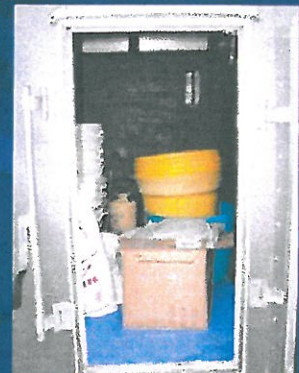
Physical Security



RESPONSE TRAILERS



Equipment and Supplies



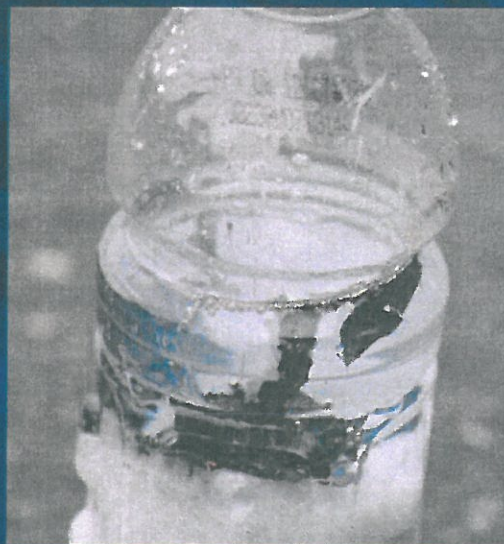
Container Program

TRAINING AND RESEARCH



DEA Authorized Central Storage (ACS) Program Training

- Two day training course
- DOT regulations
- PPE requirements
- Processing Red-P, Anhydrous Ammonia and One-Pot



DEA Authorized Central Storage (ACS) Program Training

- Over packing & Labeling
- Manifest Completion
- Practical Exercises



Roles and Responsibilities

Law Enforcement

- Maintain regulatory compliance; EPA, DOT & OSHA
- Comply w/DEA Red Book for DEA administered cleanups
- Identify, seize, dismantle, and adulterate clan lab
- Characterize, package, and mark the waste container
- Prepare packing list and transport waste to the ACS
- Contact CLC to schedule an ACS pickup
- Provide contractor with the packing list and waste

DEA Contractor

- Maintain regulatory compliance; EPA, DOT & OSHA
- Comply w/DEA Red Book for DEA contracted cleanups
- Verify waste characterization, packaging, and marking of the waste: make correction as needed
- Prepare manifest and transport waste to the TSDF
- Prepare and submit invoice packet to DEA for payment
- Maintain all cleanup and disposal documents





Contact Information

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