

CLARIFICATION NUMBER CAO-00-057, REV. 0
SAMPLING UNDER THE DRUM LID
(SECTION B1-1a(3)(i))

ISSUE

Is it necessary to prepare a non conformance report (NCR) for discarded samples taken under the drum lid when the rigid liner is unvented?

CONCLUSION

No. The NCR is only needed if the sample is retained for analysis.

DISCUSSION

In cases where generators are not sure that a rigid liner is vented, they have established procedures which allow them to sequentially take a sample from under the drum lid, then open the lid to determine if the rigid liner is vented. If not, a subsequent sample is taken from under the rigid liner.

The original sample from beneath the drum lid is considered to be non representative and is discarded.

As long as these steps are written in site procedures and the procedures are followed an NCR is not needed.