



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**


WASHINGTON, DC 20460

**JUN 17 2016**

OFFICE OF COMPLIANCE

**MEMORANDUM**

**Subject:** Issuance of "Policy on the Use of Mobile Field Inspection Tools"

**From:** Betsy Smidinger, Acting Director  
Office of Compliance 

**To:** Office Director, Office of Civil Enforcement  
Office Director, Office of Criminal Enforcement, Forensics and Training  
Regional Counsels, Regions I-X  
Enforcement Coordinators, Regions I-X  
Enforcement Directors, Region I-X

I am pleased to announce the issuance of the "Policy on the Use of Mobile Field Inspection Tools". As you know, electronic devices offer the ability to access, create, use, analyze and collect information quickly and accurately, enhancing the work of inspectors and investigators. This policy establishes the use of mobile field inspection tools as part of inspections, field investigations or compliance evaluations and identifies appropriate parameters.

This policy was developed and drafted through a collaborative effort. Members of the Workgroup who developed the policy included representatives from the Office of Compliance, the Office of Civil Enforcement, the Office of Criminal Enforcement, Forensics and Training, the Office of Environmental Information, the Department of Justice, the Office of General Counsel, Regions 6 and 9, ECOS, Oklahoma, Arizona, New Hampshire, Vermont, North Dakota and Tennessee.

If you have any questions about this policy or about the use of mobile field inspection tools, please contact Helene Ambrosino of my staff at (202) 564-2627.

**ATTACHMENT**

cc:

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Smart Tools Workgroup Chairs  
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### **POLICY ON THE USE OF MOBILE FIELD INSPECTION TOOLS**

This policy authorizes the use of mobile field inspection tools during an inspection, field investigation or compliance evaluation. A “mobile field inspection tool” is a tablet, laptop or other electronic device containing software, applications and/or data used during an inspection, field investigation or compliance evaluation. Mobile field inspection tools can be used to access, create, use, analyze and/or collect information, document field observations and develop reports. In some instances, a mobile inspection tool is intended to replace the use of hardcopy notebooks but hardcopy notebooks may be used to supplement use of the mobile inspection tool. When using mobile field inspection tools, the following applies:

- Only fully functional Agency issued mobile field inspection tools are to be used.
- Inspectors using mobile field inspection tools are to follow Agency Standard Operating Procedures (SOPs) governing inspections and field investigations, inspection reports, field documentation, records management, sampling and environmental data management, field equipment management, as well as any additional applicable policies and procedures. Electronic records should be managed in accordance with Agency record retention schedules. Applicable SOPs, policies and procedures address, but are not limited to, the following:
  - a. Rules of Behavior – Users of mobile field inspection tools are to comply with all applicable Agency policies and procedures in order to ensure that the security and integrity of IT systems, software and data are protected. These include, but are not limited to, EPA Policy *CIO 2150-P-21.0, Information Security – National Rules of Behavior* (<http://intranet.epa.gov/oei/imitpolicy/qic/ciopolicy/CIO-2150-P-21-0.pdf>) and *CIO 2150.4-P-01.1, Mobile Computing Management Procedures* (<http://intranet.epa.gov/oei/imitpolicy/qic/ciopolicy/CIO-2150.4-P-01.1.pdf>), and *CIO 2105-P-02.0, EPA QA Field Activities Procedure*.
  - b. Field Documentation - Documenting field activity should, to the extent practicable, occur contemporaneously with the field observation/collection of information. Facility records collected electronically are to be identified and handled in a manner consistent with the requirements for other field inspection records. Revisions made to electronic field documentation, other than the correction of typographical errors, should be made in a manner that preserves all previous entries (for example, use the redline/strikeout function).
  - c. Inspection Reports –Draft versions of Inspection Reports are to be saved and labeled as working files. Final Inspection Reports are to be approved by the Approval Authority by either a wet ink signature or an Agency approved electronic signature.

- d. Preservation of Records – Unedited versions of all documents and data, before any revisions, should be saved and labeled as original files. Save originals and final versions of records to an unmodifiable/read only format. Keep electronic files in a suitable location to maintain original records, final records as well as working files. Back up the data in the electronic file folders as soon as is practicable.

Disclaimer:

This policy has been developed for federally credentialed inspectors acting on behalf of EPA and is intended solely for internal management purposes. It does not create any rights, substantive or procedural, enforceable at law. EPA may periodically revise this policy to make improvements and/or to reflect changes in EPA policy. EPA reserves the right to act at variance with this policy. Variances must be explained and documented. Varying from this policy does not disqualify the use of information obtained, for any purpose.