

SECOND EDITION  
MANUAL OF CUSTODY AND NON-CUSTODY  
SAMPLE HANDLING PROCEDURES  
UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V

U.S. EPA  
Central Regional Laboratory  
Chicago, Illinois  
August 1978

Encl.  
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230 South Dearborn Street  
Chicago, Illinois 60604

U.S. EPA, Region V  
Procedures for Handling  
Custody and Non - custody Samples

I Introduction

As in any other litigation, EPA must be able to prove that any analytical data offered into evidence in a court of law accurately represents environmental conditions existing at the time of sample collection. This implies that it can be clearly demonstrated that none of the involved samples could possibly have been tampered with during collection, transfer, storage or analysis. Therefore, an accurate written record must be maintained to trace the possession of each sample from the moment of its collection through its introduction into evidence. Samples for which this accurate documentation is maintained are called custody samples. A sample is in someones "custody" if:

1. It is in his actual physical possession, or
2. It is in his view, or
3. It was in his physical possession and he locked it up so no one could tamper with it, or
4. The sample is kept in a secured area which is restricted to authorized personnel only, or
5. The sample is placed in a container which is then sealed with a "custody" seal that will be broken when the container is opened.

In Region V, a Non-Custody sample is generally handled in the same manner as a custody sample, except that personnel handling the sample may not insure at all times that the sample is in their custody. For example, laboratories that do not contain custody samples are normally not locked when the scientist must leave the laboratory for 1-2 minutes. Chain of custody forms are not completed for non-custody samples. In summary, the procedures are intended to make it highly improbable for non-authorized persons to tamper with non-

custody samples and impossible for them to tamper with custody samples.

This document describes handling procedures used by Region V to handle all samples, both custody and non-custody. Special consideration used for custody samples only are identified below as required.

## II The Physical Sample and its Description

Maintenance of custody requires satisfactory completion of three functions:

- a) Maintain custody of the samples during collection, shipping, analyses, and storage.
- b) Maintain custody of the written information describing sample collection, shipment, analyses and storage.
- c) Insure that the relationship between the physical sample and the sample description is clear, complete and accurate.

In order to relate the descriptive information to a physical sample, a unique log number is assigned to each sample, both custody and non-custody.

It should be noted that a sample may consist of several bottles and that each bottle is given the same log number indicating that all bottles contain parts of one sample. The bottles making up a sample, are differentiated by use of both a color coded label and a preservative code. Bottles containing different preservatives, are analyzed for different parameters.

## III Sample Descriptive Documentation

The written information describing a sample consists of at least a study plan, a field record sheet, (Attachment I) an initialled and dated label on each bottle making up the sample, an analysis request form that lists all measure-

ments to be performed on each sample (see Attachment II) and a "chain of custody" form (Attachment III) which lists the names of all persons having access to the sample. The file of original information is complete when all samples are analyzed and the results are recorded on the analysis request forms. These files of original data are reviewed for completeness by the Office Director or his designee and filed in locked custody files in each of the Surveillance & Analysis Division Offices. A log book is maintained in each office for the custody files which lists the files stored and the name of all persons having access to any files, the date and item(s) removed at any time from the file, and the name of the person who removed the file. Therefore, all original information, relative to a sample or group of samples, should be available shortly after a request for such information is made and the files should be up to date, complete and accurate at all times.

#### IV Custody

Sample custody is initiated at the time of sample collection by fixing a numbered custody seal to each sample taken or by placing the sample in a locked container or into a container which is sealed with a custody seal. The custody form is also immediately filled out and signed by the person collecting the sample. It is the responsibility of the sampler to insure that the sample and sample descriptive forms are in custody (locked or properly sealed to prevent tampering) and that all descriptive information is accurate and complete. Each individual who subsequently signs the custody form has a similar responsibility and in addition, must insure that all information added to the sample descriptive forms is also complete and accurate.

In addition to the general procedures described above, there are several specific items which further explain custody procedures. These are as follows:

1. A unique sample number is assigned to each sample by the office that first receives or collects the sample, (Attachment IV). This number is subsequently used to describe the sample.
2. Any unique sample, such as grab and composite samples, may be assigned a log number providing the sample is clearly defined to differentiate it from other samples. No distinction is made in the log number between custody and non-custody samples.
3. Each office that assigns log numbers must keep an official log book. An entry should be made for each sample collected (or planned for collection) which includes, as a minimum, sample number, sample description, collection date and time, name of sampler and preservative bottles used to contain the sample. The log book should also include the numbers of all custody seals used to detect tampering and a description of how/where the seal was used.
4. All packages shipped to another location should be accompanied by the chain of custody record and analysis request form. A copy of these forms should be retained by the originating office (either carbon or photo copy). Mailed packages should be registered with return receipt requested. If packages are sent by common carrier, a Government Bill of Lading should be obtained. Receipts from post offices, and bills of lading or other common carrier receipts, including UPS shipment books, should be retained as part of the permanent chain of custody documentation. The samples must be secured so that no one can tamper with them until they are delivered to the appropriate laboratory custodian.
5. When shipped samples arrive at the CRL, or District Office, they are unpacked by the shipping and receiving clerk (alternate sample custodian)

or the sample custodian and all written information is checked for completeness and accuracy. If problems are discovered, they are resolved immediately. Once everything is in order, the samples are logged into the official custody log book. Custody samples are transferred to custody storage and stored in refrigerators or on shelves as required prior to analysis. Non-custody samples can be stored on shelves in the shipping and receiving refrigerator, freezer, or room. All sample description forms (analysis request and custody) are delivered to the sample custody office where copies are made for other users and the originals are filed and maintained for at least five years.

6. When samples are to be analyzed, the analyst obtains the samples from the shipping and receiving room, or in the case of custody samples, from the custody room after checking with the sample custodian and signing the chain of custody form. If an analyst is required to be out of the laboratory while custody samples are being analyzed, he/she must insure that the laboratory is locked, or return the samples to custody storage until he/she returns.
7. If all of a custody sample is consumed during analysis, the container is discarded and the sample custodian is so advised. If some sample remains after all analyses on a custody sample are complete, the remaining sample is stored on (non refrigerated) shelving in the custody room pending release by the submitting office. All non-custody samples are discarded as soon as all analyses on them have been completed.
8. The analyst who performs an analysis should date and initial the analysis request form below the data he/she reports. The responsible

Section Chief who transmits the completed analysis request form to the sample custodian with all supporting documentation, should sign and date each set of data released. The sample custodian makes at least two copies of the reported data. One copy is sent to the requesting office, the other copy is filed with the project study.

9. Data stored in the computer is not considered to be custody data. However, computer printouts become custody when signed and dated by an analyst or Section Chief verifying the accuracy of data on the printout. These sheets on "hard copy" are handled like any other piece of written information.
10. Under no circumstances will a sample be analyzed which has not been properly logged in. A priority sheet must be completed for all samples that are to be analyzed on a priority basis.
11. All samples collected by the CRL or D.O. staff will be considered custody, unless otherwise noted.

Initial Time	Final Time	Initial Time	Final Time	Initial Time	Final Time
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# ENVIRONMENTAL PROTECTION AGENCY, REGION V BASIC DATA FORM

District Office \_\_\_\_\_ Sampling Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_ Lab Arrival Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_ Analysis Due Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_

Description: River-02111204 Mun-Trt-Eff-03244240 Ind-Trt-Eff-03444240 Account No. \_\_\_\_\_ Study \_\_\_\_\_

Lake-02111402 Mun-Eff-Riv-02211204 Ind-Eff-Riv-02411204

Mun-Raw-03212240 Ind-Raw-Inf-03412240

CRL Sample Log Number	Sample Description	Agency No. 8 digits	Station No. 6 digits	Grab Sample Collection Data or Beginning Composite Time Y Y M M D D H H H H	Depth	Type of Compo-site C1 C2 C3 C4	Ending Composite Sampling Time Y Y M M D D H H H H	Rt. Bank
1								
2								
3								
4								
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6								
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19								
20								

## 2 of 28

Day Month

## Study

[illegible]

# ENVIRONMENTAL PROTECTION AGENCY, REGION V BASIC DATA FORM

District Office

Sampling Date

Lab Arrival Date

Analysis Due Date

Day

Month

Year

Day

Month

Year

Day

Month

Year

Account No.

Study

1 = Macroinvertebrate, Ident. & Numer. 4 =

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City of New York

## Study

[illegible]

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District Office \_\_\_\_\_ Sampling Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_ Lab Arrival Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_ Analysis Due Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_

Account No. \_\_\_\_\_ Study \_\_\_\_\_

Parameter No.	00403	00310	00951	01032	38260	32730	00720
CRL Sample Log Number	Lab pH	BOD <sub>5</sub>	Fluoride <del>Fluoride</del>	Chromium Hexavalent	MBAS	Phenolics	Cyanide
Units	pH Units	mg/l	mg/l	µg/l	mg/l	µg/l	µg/l
1							
2							
3							
4							
5							
6							
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## 6 of 28

Account No. \_\_\_\_\_ Study \_\_\_\_\_

[illegible]







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Account No. \_\_\_\_\_ Study \_\_\_\_\_

## Study

CRL Sample Log Number	Parameter No.					
	Sample Description		Date Received	SO <sub>2</sub>	NO <sub>2</sub>	Particulates
	Identify high polluted samples	* Units	No./Day	µg/m³	µg/m³	µg/m³
1	East Chicago	Gas	/			
2	East Chicago	Ht-Vol	/			
3	Evansville	Gas	/			
4	Evansville	Ht-Vol	/			
5	Fort Wayne	Gas	/			
6	Fort Wayne	Ht-Vol	/			
7	Gary	Gas	/			
8	Gary	Ht-Vol	/			
9	Harmond	Gas	/			
10	Hammond	Ht-Vol	/			
11	Indianapolis	Gas	/			
12	Indianapolis	Ht-Vol	/			
13	Muncie	Gas	/			
14	Muncie	Ht-Vol	/			
15	Monroe Co.	Gas	/			
16	Monroe Co.	Ht-Vol	/			
17	New Albany	Gas	/			
18	New Albany	Ht-Vol	/			
19	South Bend	Gas	/			
20	South Bend	Ht-Vol	/			

Day Month Year

Account No. \_\_\_\_\_ Study \_\_\_\_\_

[illegible]

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## Air Parameters

[illegible]

## ENVIRONMENTAL PROTECTION AGENCY, REGION V BASIC DATA FORM:

District Office \_\_\_\_\_ Sampling Date \_\_\_\_\_  
Lab Analysis Date \_\_\_\_\_ Analysis Due Date \_\_\_\_\_

## Air Parameters

Account no. \_\_\_\_\_ Study \_\_\_\_\_

[illegible]

\* A17 "The assessment + evaluation conditions of femininity and masculinity"

## 13 of 23

Account No. \_\_\_\_\_ Study \_\_\_\_\_

Study \_\_\_\_\_

\* All values converted to standard conditions of temperature and pressure

## 14 of 22

Day Month

## Study

[illegible]

# ENVIRONMENTAL PROTECTION AGENCY, REGION V BASIC DATA FORM

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District Office _____		Sampling Date _____			Lab Arrival Date _____			Analysis Due Date _____		
		Day	Month	Year	Day	Month	Year	Day	Month	Year
Parameter No.	01067	01147	01077	01092	01012	01102	01087	01152	01022	
CPL Sample Log Number	Total Nickel	Total Selenium	Total Silver	Total Zinc	Total Beryllium	Total Tin	Total Vanadium	Total Titanium	Total Boron	
Units	µg/l	µg/l	µg/l	µg/l	µg/l	µg/l	µg/l	µg/l	µg/l	
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Account No. \_\_\_\_\_

Study \_\_\_\_\_

# ENVIRONMENTAL PROTECTION AGENCY, REGION V BASIC DATA FORM

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District Office \_\_\_\_\_ Sampling Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_ Lab Arrival Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_ Analysis Due Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_

Account No. \_\_\_\_\_ Study \_\_\_\_\_

Parameter No.	00916	00927	00929	00937	Lead in Gasoline	
CRL Sample Log Number	Total Calcium	Total Magnesium	Total Sodium	Total Potassium	By Atomic Absorption	By Kit
Units	mg/l	mg/l	mg/l	mg/l	g/gal	g/gal
1						
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## 17 of 28

## Study

[illegible]

Day Month Year

Account No. \_\_\_\_\_ Study \_\_\_\_\_

[illegible]

## 19 of 28

Day Month Year

## Study

## Account No.

[illegible]

Day Month

## Study

[illegible]



# ENVIRONMENTAL PROTECTION AGENCY, REGION V BASIC DATA FORM

District Office \_\_\_\_\_ Sampling Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_ Lab Arrival Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_ Analysis Due Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_

Check for routine pesticides ☐ ; PCB's ☐ or both ☐  
 All units are micrograms per liter of water or mg per kilogram dry sediment

Account No. \_\_\_\_\_ Study \_\_\_\_\_

	Kater *	39700		39732		39330		39430	39420											
CFL Sample Log Number	Hexachloro benzene	A-BHC	Lindane	Treflan	Diclone	Aldrin	Zytron	Isodrin	Heptachlor epoxide	γChlordane										
Sediment *	39701		39783			39333		39433	39423											
1																				
2																				
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4																				
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\* Mark out the set of parameter numbers not used

## 23 of 28

Day	Month
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Account no. \_\_\_\_\_ Study \_\_\_\_\_

[illegible]

# ENVIRONMENTAL PROTECTION AGENCY, REGION V BASIC DATA FORM

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District Office \_\_\_\_\_ Sampling Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_ Lab Arrival Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_ Analysis Due Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_

All units are micrograms per liter or milligrams per kilogram

Account No. \_\_\_\_\_ Study \_\_\_\_\_

Water *	39488	39492	39496	39500	39504	39508	39511	39512	39510	39100		
* CRL Sample Log Number	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Aroclor 1262	Aroclor 1268	Dibutyl Phthalate	Diethyl Hexyl Phthalate		
Sediment *	39491	39495	39499	39503	39507	39511			39112	39102		
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2												
3												
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\* Mark out set of parameter numbers not used



# ENVIRONMENTAL PROTECTION AGENCY, REGION V BASIC DATA FORM

District Office \_\_\_\_\_ Sampling Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_ Lab Arrival Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_ Analysis Due Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_

All units are µg/l or mg/kg.

Account No. \_\_\_\_\_ Study \_\_\_\_\_

Water *	39650					39380			39390			39460						
CRL Sample Log Number	Diuron	2,4-D iso Propylester	DNBP	Endosyl-fan I	Dieldarin	DEHP	Erdrin	Endosyl-fan II	Chloro-benzilate									
Sediment *					39383		39393		39461									
1																		
2																		
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\* Mark out set of parameter numbers not used

## 26 of 28

Date Month Year Lab Arrival Date Day Month Year Analysis Due Date Day Month Year

Account No. \_\_\_\_\_ Study \_\_\_\_\_

## Study

[illegible]

## ENVIRONMENTAL PROTECTION AGENCY, REGION V BASIC DATA FORM

District Office \_\_\_\_\_ Sampling Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_ Lab Arrival Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_ Analysis Due Date \_\_\_\_\_ Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_

All units are  $\mu\text{g/l}$  for water and  $\mu\text{g/kg}$  for sediments.

Account No. \_\_\_\_\_ Study \_\_\_\_\_

[illegible]

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Day Month

## Study

[illegible]

## CHAIN OF CUSTODY RECORD

[illegible][illegible]

The persons whose signatures are listed below certify that the collected samples listed in the sample inventory and master packing list above had the samples in their custody and the only manner in which custody was given up was either to one of the other persons listed below or to a locked and/or secured area or chest.

Signature	Date and Time
Signature	Date and Time

Region V, S&A Division Sample Numbering System

1 Oct. 1977

The general construction of a sample identification number will be according to the following guidelines:

Office Identification	(one letter)
Project Officer, etc.	(one letter)
Survey Number	(two numbers)
Sample Type	(one letter)
Sample Number	(two numbers)

Example - CL99S98 where

7  
C = Central District Office  
L = Roscoe Libby  
99 = Roscoe Libby's 99th project during the current fiscal year  
S = Sample  
98 = Sample number 98

Comments:

The office identification letters are fixed as listed below. Other letters may be added to the list later.

A = Air Surveillance Branch	D = Ohio	K = QAO
C = Central District Office	F = Michigan	O = Other
E = Eastern District Office	G = Indiana	N = GLNPO
W = Western District Office	H = Wisconsin	
L = Laboratory-Central Regional	I = Illinois	
U = U.S. Coast Guard	J = Minnesota	
T = Toxic Substance Coordinator	B = Enforcement Division	

When samples arrive directly from a State, the CRL will assign the appropriate District Office Director as project officer.

The project officer identification should be assigned by each office submitting samples or by the CRL sample custodian if unassigned previously. All assignments should be unique and all changes must be cleared with the CRL sample custodian. An example of assignments for the Central District Office might be as follows:

L = Roscoe Libby  
T = Lee Townsend  
B = Sylvester Bernotas

The survey numbers should be used in sequence by each project officer to number his surveys. If a project officer conducts more than 99 surveys in a given year, he can use another identification letter and repeat the survey numbers as required.

The sample type letter is used to identify quality assurance and other sample types. The following letters are fixed and are to be used only as specified -

- S ~ Sample
- D ~ Duplicate Sample (two samples collected)
- A ~ Duplicate Analysis (one sample split)
- L ~ Laboratory Control Standard
- R ~ Reagent Blank (Field)
- B ~ Reagent Blank (Laboratory)

All other letters may be used as the project officer wishes, after clearing with the CRL sample custodian.

The sample numbers should be assigned in numerical order to all samples collected during the specified survey. If more than 99 samples are collected during a given survey, a new survey number should be used as required to uniquely identify all samples. Quality Assurance samples should receive unique numbers with duplicates being always for the preceding sample.

Additional examples are given below to further explain the system.

Sample Number AM01S01

- A = Air Surveillance Branch
- M = Charles Miller
- 01 = Miller's first survey in FY-78
- S = Sample
- 01 = First sample collected for project 01

Sample Number AM02Z37

- A = Air Surveillance Branch
- M = Charles Miller
- 02 = Miller's second survey in FY-78
- Z = Sample from site "Z" \*
- \* the use of the letter Z to specify a site has been approved by the CRL for the proposed O'Hare Study.

Sample Number AM02A38

- A = Air Surveillance Branch
- M = Charles Miller
- 02 = Miller's second survey in FY-78
- A = A duplicate analysis of sample AM02S37
- 38 = The thirty-eighth sample in project 02

East  
F  
2000  
Chicago, Illinois 60604



Sample Number AM02D39

A, M, 02 as defined above

D = A duplicate sample of AM02A38 (or AM02S37)

39 = the 39th sample in project 02.