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, Itlinois August 1978

> Edition Fusion 11 230 Scular de Lorra Flanck Chicago, Illucas 60304

#### 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. Sample, 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 <u>Non-Custody</u> 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 assignes 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.

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																µg/l	Total Vanadium	01087	Lab Arrival Date Account No.
																l/64	Total Titanium	01152	No
																L/Br	Total Boron	01022	Year
																			Analysis Due Date
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	•																mg/l	Total Calcium	00916	Office
																	mg/l	Total Magnesium	00927	
															•		mg/1	Total Sodium	00929	Sampling Date_
																	mg/1	Total Potassium	00937	Date <u>Day Month</u>
AME 65-74																	g/gal	By Atomic Absorption	Lead i	Year Leb A
																	g/gal	By Kit Kit #	in Gasoline	Date Day
	,												And a strong control							ronth Year Analysis Due Date.
																				Due Date <u>Day Month</u>

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																		l/64	Dis. Aluminum	01106	fice
																		h9/1	Dis. Cadmium	01025	
										}								l/6ri	Dis. Chromium	01030	Sampl
																		L/bri	Dis. Copper	01040	Sampling Date
																		l/5㎡	Dis. Iron	01046	Day Month
																		1/6M	Dis. Lead	01049	Year La
																		l/6m	Dis. Manganese	01056	Lab Arrival Date. Account No.
																		µ9/1	Dis. Nickel	01065	Day
																		ид/1	Dis. Zinc	01090	Month Year
									•												Analysis Due Date

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																				Units	CRL Sample Log Number	Parameter No.	
																er van de		The state of the s		mg/kg	Al Mud Dry Wt	01108	Sediment Samples
																				mg/kg	Ba Mud Dry Wt	01008	
																				mg/kg	Cd Mud Dry Wt	01028	
																				mg/kg	Cr Mud Dry Wt	01029	Day Month
																				mg/kg	Co Mud Dry Wt .	01038	Year Ac
																				ng/kg	Cu Mud Dry Wt	01043	Account No
																	-			mg/kg	Fe Mud Dry Wt	01170	Montn Year
!																				mg/kg	Pb Mud Dry Wt	01052	Study
																				mg/kg	Mn Muc Dry Wt	01053	Day
										6													Month

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																	mg/kg	Ni Mud Dry Wt	01063	Sediment
																	mg/kg	Zn Mud Dry Wt	01093	Samples .
																	mg/kg	As Mud Dry Wt	01003	Sampling
																	ing/kg	Se Mud Dry W+	01148	Sampling Date Day 14
																				Touth Year
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																			mg/kg	Oil and Grease Mud	00553	
																						Samp1 i
																			µg/1	Methylene Chloride		ng Date Day
														·					μ9/1	Carbon tetrachloride		Sampling DateDay 'Month Year
																			μg/]	Chloroform		Lab Arrival Date_ Account No
	I																		р9/1	l,2-dichloro ethane		tr <u>Day Month Year</u> o
																			μ9/1	Bromo- dichloro- methane		
			i																јуј/1	Chloro- dibromo- methane		_Analysis Due Date_ _Study
																			μ9/1	Bromo form		Day Month
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not to sod																			Treflan		
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#### U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION V DISTRICT OFFICE CHAIN OF CUSTODY RECORD

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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.

SAMPLER(S)		
	Signature	Date and Time
Transmitted to		
	Signature	Date and Time
Transmitted to		
Transmitted to		
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to		
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to		

1

#### 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:

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

Example - CL99S98 where

C = Central District Office

L = Toscoe 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.

> K = QAO $\Lambda = Air Surveillance Branch$ D = Ohio0 = OtherC = Central District Office F = Michigan E = Eastern District Office G = Indiana
> W = Western District Office H = Wisconsin N=GLNPO

· 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 1

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 shoul he 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 AM01801

A = Air Surveillance Branch

M = Charles Miller

O1 = Miller's first survey in FY-78

S = Sample

Ol = First sample collected for project Ol

Sample Number AM02Z37

 $\Lambda = Air Surveillance Branch$ 

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

 $\Lambda = \Lambda$  duplicate analysis of sample AMO2S37

38 = The thirty-eighth sample in project 02

End of Residence Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Contract Cont

Sample Number AMO2D39

A, M, O2 as defined above

D = A duplicate sample of AMO2A38 (or AMO2S37)

39 = the 39th sample in project O2.