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Environmental Protection  
Agency

Environmental Services Div.

Region 10  
1200 Sixth Avenue  
Seattle WA

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Alaska  
Idaho  
Oregon  
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# Field Sampler Training Course Manual



EPA REGION 10  
FIELD SAMPLER TRAINING COURSE  
MAY 19, 1986

AGENDA

<u>Time</u>	<u>Topic</u>	<u>Speaker</u>	<u>EPA Phone Extention</u>
9:00	Introduction	Dick Bauer/Paul Boys	1567
9:15	Quality Assurance	Roy Jones	7373
9:45	Sample Control Center and Administrative Procedures	Joyce Crosson	8562
10:10	Sample Equipment Assembly and Cleaning Procedures	Andy Hess	0370
10:20	<u>Break</u>		
10:45	Elements of Field Sampling	Paul Boys/ Dan Tangarone	1567
11:00	Field Documentation	Dan Tangarone	1630
11:40	Labeling, Packaging & Shipping	Andy Hess	0370
12:00	<u>Lunch</u>		
1:00	Sample Shipment Logistics	Andy Hess	0370
1:15	Safety	Ron Blair	0370
2:00	Data Access	Joyce Crosson	8562
2:15	Legal Considerations	Dave Heineck	1498
2:45	Laboratory Considerations	Steve Pope	0370

EPA REGION 10  
FIELD SAMPLER TRAINING COURSE MANUAL

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## 1.0 INTRODUCTION

For a variety of reasons, field sampling has become more complicated both technically and administratively. Uniform procedures for field sampling activities are needed to:

- . Provide data of known quality for making environmental decisions or taking enforcement action,
- . Make efficient use of the available laboratory capacity,
- . Reduce problems created by improper sample handling procedures.

The Region 10 Field Sampler Training Course is intended to acquaint EPA samplers with the important elements for successful field sampling. This course emphasizes the general procedural aspects of sampling common to all programs administered by EPA. Other training references must be consulted for specific sampling techniques and statistical sample plan design.

The information provided in the Field Sampler Training Course is part of a larger training program for EPA field inspectors covering administrative, technical, legal and communications aspects of field sampling, inspection and compliance activities. The modules of the Inspector Training Program that are included in this Field Sampler Training Course are highlighted in Figure 1.1. EPA samplers may also want to participate in other elements of the Inspector Training Program.

The material is presented in the logical sequence of a typical sampling exercise as shown in the table of contents. The course is intended to present the proper procedures and to explain the reasons for the procedures. The manual can be used as a reference to remind you of the critical elements of a field sampling project. It is not, however, intended to be a comprehensive treatise on field sampling.

Each section of the manual is numbered and dated. Revised sections will be distributed when any significant change is made. If at any time you have questions related to proper sampling procedures, please contact the appropriate person listed by each topic on the agenda on the Chief of the Field Operations and Technical Support Branch, Environmental Services Division.

Basic Training Program  
for Region 10 Compliance Inspectors

## Training for Inspectors

	Laboratory/Field Data Access	Confidential Business Information	
Finance Considerations	Basic Photography	Overview of Environmental Statues	
Time Accounting Considerations	Laboratory Considerations	Criminal vs. Civil Investigations	
Field Equipment And Supplies	Sample Management	Case Development Procedures	Technical Report Writing
Safety Policy/Admin. Procedures	Project Plan Development	Entry Protocol	Relationship Between EPA & State/ Local Inspectors
Employee Conduct	Safety Training	Witness Guidelines	Dealing with the Media & Public
<i>Administration</i>	<i>Technical</i>	<i>Legal</i>	<i>Communication</i>

Figure 1.1

## What Is Quality Assurance ?

The Environmental Protection Agency is a regulatory agency, an enforcement predicated organization, and as such, all data generated or used by EPA must be of known, defensible, and verifiable documented quality. This is a matter of agency policy, as expressed in EPA Order 5360.1, and as such should be viewed as an integral requirement of all data gathering activities.

We're all familiar with QC; it is (or should be) a normal part of good field and laboratory practice. It is the "built ins" included in methods to be sure we're getting the data we want. QC includes all of the procedures applied to data collection and generation activities in order to achieve and maintain a desired level of data quality as established by Agency and Program Managers. The desired level of data quality should be based on the intended use of the data. Therefore the QC should include all of the technical controls utilized, i.e. sampling and analytical methods, use of blanks, replicate and duplicate samples, inclusion of performance or standard samples, standard curves and statistics, etc. The controls start with the design of the data acquisition project and carry through to the ultimate data reporting and completion of all of the documentation of the use of these controls.

QA, on the other hand, refers to the procedures used by the management to assure that the QC is what is required and that it is being adhered to at any point on the project. QA constitutes the overview and monitoring processes designed to be sure that the quality of the data generated meets the desired levels as established by the management. These controls include establishing data quality objectives based on the intended use of the data, the institution of procedures for formalizing planning documents prior to the initiation of data collection activities, and the use of audits to identify problems in QC.

The headquarters Quality Assurance Management Staff (QAMS) and the Regional Quality Assurance Management Office (RQAMO) has been working with individual program managers, field specialists, and the Office of Regional Counsel to develop program specific QA guidance materials. These are intended to aid the regional monitoring programs in developing their site specific Quality Assurance Project Plans (QAPs).

We hope to reduce the paperwork, but we also want to make sure that the whole program team is involved and understands why they are doing what they are doing when monitoring and gathering environmental data. We feel that resource expenditure for sound QA at the front end of a project will more than pay for time and resources utilized at the end. As professionals, we cannot condone never having enough time to do a job right, but always having enough time to do it over. With this philosophy in mind, let's review the QA program required elements, and illustrate them with some of the RQAMO's guidance material.

The Region 10 Format addresses the following elements:

- **Project Description and Site Location:** This element documents the WHAT, WHERE and part of the WHY of the project being conducted. This will include some of the history and the justification for the project and deals with the physical aspects defining the project area, space, and environmental concerns requiring the generation of data.
- **Project Measurement Objectives:** Here we "zero in" on the information we need as professionals to meet the requirements of the project. These may be clearly defined by regulatory specification, or may be based on enforcement needs requiring investigative procedures developed scientifically to address one particular site or type of problem. Ideally, this is a joint decision of both the field investigator and the project manager if they are different individuals.
- **Sample Rationale and Network Design:** This is the description of HOW you decided to take the samples or measurements WHERE you are going to take them. Such decisions (rationale) are site related, but the mechanisms of selecting the actual sample points (network) is a mixture applied statistics, regulatory requirement, enforcement needs and, most important, COMMON SENSE.
- **Analyses Rationale:** This is presented as a matrix to help the preparer(s) of the QAP document the regulatory required information relevant to analytical methods. Remember, the analyses of a sample really starts with the designation and preparation of the sample container, and the statistical evaluation of some elements of quality are time and consistency dependent, hence the holding time and preservation factors. This section starts the real "paper trail" which we hope will make clear to the planners and anyone later in the process the physical accountability of the project. Here, for the first time in the process, some of the field QC samples normally used are designated as QA samples, and so listed.
- **Data Quality Objectives:** Actually, the majority of these elements we are discussing are Data Quality Objectives; by breaking them down into discrete steps we can avoid overlooking any of them. This particular section is another matrix essential to the QA process, but also helpful to the planners and their successors. They list what elements, compounds, classes of compounds, and/or physical data required for the needs of the project. Tied to this is listed the method the planners have chosen (usually from experience, consultation with the laboratory, or because of regulatory requirement) to best generate the type of data desired and help ensure data comparability. The method listed usually spells out the Detection Limit, and should help define the Precision and Accuracy for the total measurement system or at least for the analyses specified. The Completeness information lets the planner define the actual amount of the data generated, and be certain that sufficient data is acquired to satisfy the plan and its validity.

- This completeness information provides a built in control to be sure that the actual samples taken are analyzed and reported, or that their loss results in a corrective action. All of the DQO's are used to be sure the data is representative of the conditions on site, and results should be expressed in terms or units comparable with previously collected data.
- Sample Procedures to be used: This section keys the planner and the sampler to a clearer agreement of the positions stated in the Project Measurement Objectives and the Sample Rationale and Network Derivation sections. It should provide a meeting ground for professional understanding of both technical and management special considerations. It should provide any reviewer at any point in time basic information about the physical acquisition of the samples.
- Sample Custody and Documentation: This is the very core of the "paper trail". At the minimum, this section should meet the recording and documentation requirements authorizing the specific project. This does not mean we do not perform the most conscientious and professional job we can on a given project, but that we also have to assume additional duties to document what we have done. Hopefully, this QA planning format will make this easier.

One very important point to remember about the Sample Documentation and Chain of Custody requirements of the QA planning process: They are designed to protect you as a potential witness, and your credibility as a professional. If this is accomplished, then the credibility and litigational position of the agency is greatly strengthened. It could be three years or more for some litigational processes to pass before you might be called as a witness. You will need every document you can get your hands on to refresh your memory or establish that you acted in a professional manner, according to the normal conduct of your business.

- Calibration Procedures and Frequency: This element deals primarily with physical measurements in the field and the laboratory. It may be dealt with best by encouraging the use of Standard Operating Procedures (SOP), (as is done in the Laboratory) in the field. Such an SOP would define calibration and standardization procedures, required frequency, and operational checks (zero and span adjustments) etc. It is also the place to list acceptable deviations, or cite alternate approved methods. Field expedients are acceptable, provided they do not compromise data required by a regulation, are technically sound, and are completely documented.
- Preventative Maintenance: Really an extension of above, but more concerned with the instruments used and documenting their consistent condition. This section could best be satisfied if both Lab and Field Instruments were covered in an SOP listing manufacturer's operational and maintenance recommendations.



- **Laboratory Data Reduction/QA Review:** In this section, the planner of the project can designate what degree of QA effort each involved element of a project would require. Normally, the Laboratory QA review will classify the laboratory data by evaluating the QC/QA sample results for checking the Precision, Accuracy, Completeness and other objectives defined by the QAP or other supporting or cited QA documents.
- **Field Data Reduction/QA Review:** In this section, the planner and the field technical professionals should detail the degree of operational procedures to be used on physical measurements taken in the field. Use of blank, duplicate, or check samples, sampler/recorder to verify each other's observations, retention of read-out or analog charts, photographs, self-check by entering observations (where applicable) on both the Field Data Sheet and in a Field Log or Notebook, all are examples of the type of information required here.
- **System and Performance Audits:** In this section, the project planners or their management may request or specify a variety of audits. The QAO can supply standard QC materials for project specific performance evaluation (PE) type audits, and can conduct in depth Management System Audits (MSA), Technical System Audits (TSA) and Document System Audits (DSA) at either the field, laboratory or office level. Alternately, an audit may be scheduled by the RQAMO, ESD peer review, or externally by ORC, NEIC, EMSL, etc.
- **QA Report to Management:** Normally, RQAMO will review data packages in cooperation with laboratory staff, or project managers. Any audit performed will result in a complete report to the appropriate management, and in the event of a corrective action being required, will result in additional documentation of the solution sought and reached or action taken.
- **Corrective Action:** This is the element which allows a great degree of flexibility in meeting QA/QC requirements when actually conducting field operations in the real world. If, in your professional opinion, you cannot perform the field operation as described in this plan, even through no fault of your own, you can exercise your training, ability, and professional innovativeness to generate the data required. If an auditor sees a need for a different approach, if another investigator sees a related problem not addressed in the plan, if a legal point arises, you can add or subtract samples or other activities, provided you document your changes and reasons for the actions on a form, such as that appended to our model QAP. You will have to justify why, after the fact, but if you had sufficient cause to deviate from the plan, you should have no problem with use of a the Corrective Action Checklist.

**Sample Alterations:** The same philosophy applies to use of this Checklist, but is aimed more at the actual measuring or analyzing protocols used both in the field and in the Laboratory. They are both verifiable points on the paper trail, supplying defensible reasons for deviating from a plan, and tracking changes in the amount of data generated for a specific plan.

- Safety: This is technically a part of the QA plan, but this section can be used to cite Regional or Agency plans acceptable to the Regional Safety Officer. Any deviation from accepted Regional or Agency Safety Protocols must be defined in a separate Site or Project Safety Plan approved by the Regional Safety Officer.

Again, the RQAMO, in cooperation with program staff personnel, have developed comprehensive guidance packages for meeting the QA requirements of specific programs. I would stress the fact that these are Program specific GUIDANCE, and as such contain a variety of material, not all of which would be applicable to one particular site specific Quality Assurance Plan. Remember, the desired level of data quality should be based on the intended use of the data. The planner can extract from the guidance that level of QA dictated by the needs of the specific project. The RQAMO would like to see the Project Officers develop their site specific QA Plans, and will cooperate and assist in the development of Standard Operating Procedures (SOP) for specific operations like NPDES, PCB Inspections, etc..

We have included in the packages a suggested format for individual QAP's, which also serves as a tracking/scheduling document for the sampling and analysis phases of an investigation or inspection. We would appreciate, for the purposes of reviewing and assisting the preparers of QAP's, that the order of information follow the outline of this format, and include the first page containing the sign-off information critical to the scheduling.

# QUALITY ASSURANCE PROJECT PLAN

Project Name: \_\_\_\_\_

Project Manager: \_\_\_\_\_

Field Operations: \_\_\_\_\_

QA Office Concurrence: \_\_\_\_\_ Date: \_\_\_\_\_

ESD Peer Review: \_\_\_\_\_ Date: \_\_\_\_\_

Project No.: \_\_\_\_\_ Account No.: \_\_\_\_\_

Laboratory Designated: \_\_\_\_\_ EPA \_\_\_\_\_ CLP \_\_\_\_\_ Private

Sample Numbers assigned: from \_\_\_\_\_ to \_\_\_\_\_

Sample Schedule and Milestones:

Activity/Date:    /    /    /    /    /    /    /    /    /  
/                    /  
                     /  
                     /  
                     /  
                     /  
                     /

Reports required: \_\_\_\_\_

/ \_\_\_\_\_

Sample Management Contrpl Center \_\_\_\_\_

Date: \_\_\_\_\_

Project Description and Site Location:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Project Measurement Objectives (Intended use of data):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Sample rationale and network derivation:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Analyses Rationale:

<u># of Samples</u>	<u>Parameter</u>	<u>QA Samples</u>	<u>Matrix</u>	<u>Container</u>	<u>Holding Time</u>	<u>Preservation</u>

Data Quality Objectives:

<u>Parameter</u>	<u>Method #</u>	<u>Detection Limits</u>	<u>Precision</u>	<u>Accuracy</u>	<u>Completeness</u>

Sample procedures to be used:


Sample Custody and Documentation:


Calibration Procedures and Frequency:


Preventative Maintenance:


If, for any reason, the schedules or procedures above cannot be followed, the appropriate person must complete a "Sample Alteration Checklist" for each element changed and have it (them) verified and reviewed by the Project Manager and the QA Officer/Peer Review. (See page 5)

Laboratory Data Reduction / QA Review:

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Field Data Reduction/QA Review:

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Reports (as deliverable or required):

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System and Performance Audits:

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Scheduled: \_\_\_\_\_ Conducted: \_\_\_\_\_

Corrective Action: (IF YES, COMPLETE CORRECTIVE ACTION CHECKLIST AND/OR  
SAMPLE ALTERATION FORMS, Appendix B.)

QA Report to Management:

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Safety:

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## SAMPLE ALTERATION CHECKLIST

Project Name and Number:

\_\_\_\_\_

Material to be sampled:

\_\_\_\_\_

Measurement Parameter:

\_\_\_\_\_

Standard Procedure for Field collection & Laboratory Analysis (cite references):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Reason for change in Field Procedure or Analytical Variation:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Variation from Field or Analytical Procedure:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Special Equipment, Materials, or Personnel Required:

\_\_\_\_\_  
\_\_\_\_\_

Initiators Name: \_\_\_\_\_ Date: \_\_\_\_\_

Project Approval: \_\_\_\_\_ Date: \_\_\_\_\_

Laboratory Approval: \_\_\_\_\_ Date: \_\_\_\_\_

QA Officer/Reviewer: \_\_\_\_\_ Date: \_\_\_\_\_

Sample Control Center: \_\_\_\_\_ Date: \_\_\_\_\_

## CORRECTIVE ACTION CHECKLIST

Project Name and Number:

\_\_\_\_\_

Sample Dates Involved:

\_\_\_\_\_

Measurement Parameter(s):

\_\_\_\_\_

Acceptable Data Range:

\_\_\_\_\_

\_\_\_\_\_

Problem Areas Requiring Corrective Action:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Measures Required to Correct Problems:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Means of Detecting Problems and Verifying Correction:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Initiators Name: \_\_\_\_\_ Date: \_\_\_\_\_

Project Approval: \_\_\_\_\_ Date: \_\_\_\_\_

Laboratory Approval: \_\_\_\_\_ Date: \_\_\_\_\_

QA Officer/Reviewer: \_\_\_\_\_ Date: \_\_\_\_\_

Sample Control Center: \_\_\_\_\_ Date: \_\_\_\_\_



### 3.0 REGIONAL SAMPLE CONTROL CENTER

- 3.1 Introduction
- 3.2 Major Responsibilities
- 3.3 Procedures for reserving laboratory space
- 3.4 Priorization of samples at the EPA Laboratory
- 3.5 Obtaining a project code, lab numbers and lab space
- 3.6 After samples are shipped / Calling in shipping information
- 3.7 Hard data

## REGIONAL SAMPLE CONTROL CENTER

### 3.1 Introduction

The Regional Sample Control Center (RSCC) is located in the Field Operations and Technical Support Branch of the Environmental Services Division. The basic objectives of the RSCC are to:

- maximize the utility of Regional Laboratory support resources including the EPA Lab and the National Contract Laboratory Programs, and
- provide timely and accurate Laboratory support to all regional environmental programs.

### 3.2 Major Responsibilities

The RSCC's major responsibilities include:

- Ensuring that Regional administrative procedures (i.e., an approved QA plan prior to sampling) are adhered to.
- Providing to Headquarters sample demand estimates and updates for the Superfund and RCRA programs.
- Coordinating and tracking the Quality Assurance review of Contract Laboratory data.
- Gathering sampling projections for the EPA Lab from all Programs.
- Reserving lab space and making Lab arrangements for the analysis of samples at the EPA lab and contract labs.
- Providing sample priority information to the Manchester lab.
- Coordinating the entry of contract lab data with the Manchester Lab.
- Assisting the Quality Assurance Office in performing QA audits.
- Providing data (several outputs are available) to Project Officers.

## REGIONAL SAMPLE CONTROL CENTER

### 3.3 Procedure For Reserving Laboratory Space

- Each month Programs and Operations Offices are asked, by the the RSCC, for their Laboratory support needs for the coming month.
- Superfund requests for Laboratory support should be given to the RSCC as soon as possible. Routine contract lab work is scheduled the Tuesday before the week of sampling. Special Analytical Services requests require 2-3 weeks advance notice.
- Programs are encouraged to give the RSCC as much advance notice as possible for longer range lab needs.
- The RSCC maintains a master, long range calendar of upcoming laboratory support necessary. Last minute, non-emergency requests for lab support will be honored to the extent possible.
- If analyses of special or non-routine parameters are to be performed by the EPA Lab or the CLP this information should be given to the RSCC as soon as possible for scheduling and coordination with the EPA Lab or the Sample Management Office.
- Project Officers should inform the RSCC of any changes in the sampling plans (i.e., sampling is delayed) and why immediately. Contract lab space must be cancelled or rescheduled as soon as possible once the plans have changed. Headquarters also tracks closely the Region's useage of the CLP.

### 3.4 Priorization of samples at the EPA, Manchester Lab

A request for sample priorization is sent out by the RSCC to the Program Section Chiefs twice a month. The Program is asked to prioritize their projects or indicate if there are any samples which require a high priority. High priority samples are usually those where there is a public health threat or the data is needed quickly for an enforcement or legal action. The maximum recommended sample holding time for the scheduled analyses is also a factor which the Lab will consider. If no priority information is received samples are analyzed on a first-in-first-out basis. The goal is to have a 30-45 day turnaround on all samples, however, the turnaround time may increase when the Lab is performing more complicated or non-routine analyses.

Project Officers should inform the RSCC of samples which will be high priority in advance (before the samples are collected). The RSCC may ask the Project Officer to consider rescheduling if a quick turnaround is not possible due to a large Lab Backlog or other samples requiring a quick turnaround. All efforts will be made to respond to the Program's needs. Contact the RSCC to change the priority of samples between sample priorization request periods.

## REGIONAL SAMPLE CONTROL CENTER

### 3.5 Obtaining a Project code, lab numbers and lab space

Before laboratory space is provided an approved Quality Assurance plan or, in the case of a TSCA inspection, a PCB inspection plan, must be provided to the RSCC. However, as soon as a Project Officer knows of upcoming sampling the RSCC should be informed. This early notification is necessary so that lab space can be reserved.

Once the QA plan is approved and a Lab is assigned the applicable codes will be issued to the Project Officer. Necessary paperwork for field documentation can also be obtained through the RSCC.

### 3.6 After samples are shipped

After the samples are shipped to the Manchester lab, the lab should be called with the number of samples shipped and the expected arrival date. If the Lab cannot be reached call the RSCC. On samples going to a contract lab, either the RSCC or the Sample Management Office should be called with the shipping information (i.e., airbill number, number and matrix of samples, and receiving Lab).

### 3.7 Hard Data

Once all analyses are completed by the EPA lab the data is sent automatically by the RSCC to the designated Project Officer. If partial data retrievals are desired the Project Officer can inform the RSCC of this at the time the Lab is assigned.

Contract Lab data is now being entered into the Laboratory Management System; the main database for analytical results. After the data packages are quality assured and the data stored and verified in the database; computerized outputs will be sent to the Project Officers. The entering of CLP data is still a relatively new procedure. Initially, Project Officers may still receive some data in memo form.

## 4.0 Sample Equipment Assembly

### 4.1 Equipment and Supply Requisition

- Complete Field Supply List (see page 4-2) and submit it to Andy Hess to request field supplies, sampling containers, blank water and safety gear.
- Attached is a copy of the Field Supply List with the recommended sample containers for the Manchester Lab listed on the back.
- Refer to the Equipment Tracking System catalog (available from John Osborn, Rene Fuentes, Paul Boys, Billie Lee, Dave Turpening, Bob Burd, and Dave Bueker for lists of available supplies and equipment.
- Allow adequate time for preparation and shipment.

### 4.2 Sample of Equipment and Supplies Available

#### Air Equipment

Air pumps  
Air sample bags  
Wind system recorder  
Flow meter  
Temperature meter  
Thermal desorber

#### Biological Equip.

Fish shocker  
Benthic samplers  
Plankton samplers  
Benthic respirometer  
Van Dorn samplers  
Kemmers  
Live fish holders

#### Clothes

Rubber boots  
Chest waders  
Hip waders  
Rain gear  
Gloves-neoprene,  
& disposable  
Cotton coveralls  
Disposable tyvek  
coveralls  
Boot covers  
Hardhats

#### Communication

2-way radios  
Remic headsets  
Megaphone  
Air horn

#### Vehicles & Boats

4x4 Van & Truck  
Van with raised roof  
16' Boston Whaler  
24' Monark with winch  
17' Smokercraft  
Electroshocking boat

#### Soil Sample Equip.

Hand auger  
Mobile drills  
Dredges  
Coring devices  
Shovels, etc.  
Disposable wood  
tongue depressors  
Sieves  
Stainless spatulas  
Piston corer

#### Ground Water Equip.

Water level indicator  
Bailers  
Electrical logger  
Resistivity meter  
Gamma-ray logger  
Well point sampler  
Hydrolab (4" diam.)  
Hydrologic monitor  
Proton magnetometer  
Submersible pump  
Peristaltic pump

#### Miscellaneous

Survey equipment  
Rangefinder  
Camping gear  
Buckets  
Carboys  
Fire extinguisher  
Fence posts  
Generator  
Multimeter  
Power inverter  
Rain gauges  
Tools  
Metal Detector  
Steam cleaner  
Flashlights  
Chart recorder

#### Hazardous/Safety Equip.

Combustable gas &  
oxygen alarm  
Combustable gas indicator  
Draeger detector & tubes  
Dosimeter  
Encapsulated suits  
Respirators & cartridges  
Escape masks  
Explosimeter  
Eye and face wash  
First aid kit  
HNU photoionizer  
SCBA's & air cylinders  
Organic Vapor Analyzer  
Radiation detector  
Resuscitator  
Sound level meter

#### Surface Water Equip.

Alpha sampling bottles  
Current meters  
Suspended Sed. samples  
Chlorine test kit  
Conductivity meter  
Depth finder  
DO meter  
pH meters  
Dye, florescent  
ISCO samplers  
Manning flowmeters  
Hydrolabs  
Horiba Water tester  
Inhoff cones  
Salinometer  
Secchi discs  
Tele-thermometer  
Thermographs  
Thermometers  
Turbidimeter  
Drum thieves

U.S. ENVIRONMENTAL PROTECTION AGENCY  
Region 10 - Seattle

FIELD SUPPLY LIST

DATA

\_\_\_ Field Sample Data \_\_\_ Custody Tape \_\_\_ Chain of Custody Sheet  
\_\_\_ & Chain of Custody Sheet

Analysis Required Sheets

\_\_\_ Priority Pollutants - Organics \_\_\_ Oxygen Demand, Solids & Nutrients  
\_\_\_ Physical & General Inorganics & Ion Chromatograph \_\_\_ Metals

Containers

Glass Jars

Cubitainers

___ 1 gal	___ C-Free	___ 8 oz.	___ C-Free	___ 1 qt(1L)	___ Deion/Dist
___ 1/2 gal	___ C-Free	___ 4 oz.	___ C-Free	___ 1 gal	___ Deion/Dist
___ 32 oz.	___ C-Free	___ 120ml vial	___ C-Free	___ 2+ gal	___ Deion/Dist
___ 16 oz.	___ C-Free	___ 40ml VOA	___ C-Free	___ other	_____

General Supplies

___ Sample Labels	___ Roll Paper Towels/Kimwipes	___ Duct Tape
___ Label Tape	___ Plastic Bags, size _____	___ Flashlight
___ Lab Markers	___ Tags & Rubber Bands	___ Measuring Tape
___ Strapping Tape	___ Rite-in-the-Rain Notebook	___ Detergent
___ Shipping Labels	___ Empty Ice Chests	___ Washwater
other _____		

Protective Clothing and Gear

___ Neoprene Gloves, size _____	___ Hard Hat
___ Disposable Vinyl Gloves, size _____	___ Goggles/Face Shield
___ Boot covers, size _____	___ Respirator cartridge/canister: specify type _____
___ Rubber boots (steel toe), size _____	___ Cotton Coveralls, size _____
___ Rain gear, size _____:	___ Waders, Hip/Chest, size _____
___ Jacket, ___ Pants, ___ Overalls	___ First Aid Kit
___ Tyvek Coveralls, size _____	
other _____	

Sample Collection Gear

Sediment

Water/Liquid

___ Disposable wood spatulas	___ Automatic Water Sampler (ISCO)
___ Hand Trowel/Shovel	___ Peristaltic Pump
___ Hand Coring Device	___ Bailer
___ Hand Auger	___ Van Dorn/Kemmer Bottle
___ Dredge	___ Drum Thief
___ Power Drilling Rig	___ Bucket/Scoop with long handle
other _____	other _____

Meters/Detectors

\_\_\_ pH; \_\_\_ Conductivity; \_\_\_ DO; \_\_\_ Temperature; \_\_\_ Turbidity; \_\_\_ Multiparameter  
\_\_\_ HNU, \_\_\_ 10.2ev., \_\_\_ 11.7ev.; \_\_\_ OVA; \_\_\_ CGI/Oxygen; \_\_\_ Current  
\_\_\_ pH paper; \_\_\_ Thermometer, °C/°F; Detector Tubes, specify \_\_\_\_\_  
other \_\_\_\_\_

Requestor: \_\_\_\_\_ Phone: \_\_\_\_\_ Date Required: \_\_\_\_\_  
Sample Location: \_\_\_\_\_ Account Number: \_\_\_\_\_  
Return to Andy Hess, M/S LAB, 442-0370

OTHER ITEMS AND ACCOUNTABLE ITEMS WITH EPA DECAL NUMBERS:

Sample volumes and containers required by the EPA Manchester Lab for certain analyses are shown below. This information is intended as a guide only. It is recommended that the Laboratory be contacted when determining the proper sample containers.

<u>Parameter and Matrix</u>	<u>Size and Type of Container</u>
Base/Neutral/Acid - Water	1 gallon glass
Pesticides - Water	1/2 gallon glass (wide mouth)
Base/Neutral/Acid/Pesticides - Sediment	8 ounce glass
Volatile Organics - Water	2 40 ml glass vials
Volatile Organics - Sediment	8 ounce glass
PCB - Oil	16 or 40 ml glass vial
PCB - Water	1/2 gallon glass
PCB - Sediment	8 ounce glass
Herbicides - Water	1/2 gallon glass
Herbicides - Sediment	8 ounce glass
Oil and Grease - Water	1/2 gallon glass
Oil and Grease - Sediment	8 ounce glass
Cyanide - Water	1 quart cubitainer
Phenols - Water	1 quart glass
Metals - Water	1 quart cubitainer
Cyanide/Phenols/Metals - Sediment	8 ounce glass
Total Organic Halides (TOX) - Water	1 quart glass
Total Organic Carbon (TOC) - Water	1 quart cubitainer
Ignitability - Liquid (60 mls required)	4 or 8 ounce glass
Biological Oxygen Demand (BOD) - Water	1 gallon cubitainer

## 5.0 ELEMENTS OF FIELD SAMPLING

This course is not intended to go into any significant detail on the technical procedures for sampling. Each program has reference manuals or guidance documents which provide this type of information. In this section only a brief listing of some of the general sampling considerations will be mentioned. The point is to stimulate the sampler/project officer to give sufficient thought to the particular sampling techniques that may be needed for the planned project. Several sampling considerations which need to be included in the planning are listed below.

### 5.1 REPRESENTATIVENESS

- Space and time
- Grab or composite
- What will the sample result be compared with or used for

### 5.2 CONTAMINATION

- Take care not to cross-contaminate samples
- Use disposable sampling utensils whenever possible
- Pre-rinse cubitainers with the water from the sample source, if appropriate

### 5.3 IN-SITU MEASUREMENTS

- Insure proper calibration of the instrument prior to performing the measurement (and afterwards, if appropriate)
- Record the instrument range/span/or gain settings used at the time of measurement

### 5.4 VOLUME OF SAMPLE COLLECTED

- Consider the amount needed to perform the requested analyses (see page 4-3), but remember that the lab prefers not to have much residual sample volume for hazardous waste samples (ie. soil analysis requires about 6 ounces)
- VOA, O<sub>2</sub>, pH, CO<sub>2</sub>, H<sub>2</sub>S, NH<sub>3</sub>, free chlorine, SO<sub>2</sub>, and hardness samples must completely fill the container
- Allow 10% ullage for all other samples or overpack into a larger container

### 5.5 SAMPLE COLLECTION DEVICES/TECHNIQUES

- Refer to the ESD Equipment Tracking System listing for available sampling equipment (or call Andy Hess at 2-0370)
- Go prepared for several alternative sampling approaches
- Refer to program specific sampling manuals and guidance manuals



## 6.0 FIELD DOCUMENTATION

# FIELD SAMPLE DATA AND CHAIN OF CUSTODY SHEET (FSDCOCS)

- 1 Project Code & Account No Obtain from Joyce Crosson 442-8562
- 2 Name / Location As appropriate.
- 3 Project Officer Name of person who should receive lab data.  
Usually person collecting samples.
- 4 Check appropriate box
- 5 Notes Use for comments.
- 6 Samplers List names
- 7 Recorder Signature of person completing the FSDCOCS
- 8 Examples  
    Source Code See Back of FSDCOCS  
    Matrix As appropriate  
    Number of Containers Enter number  
    Lab Number Obtain from Joyce Crosson before sampling  
    Note 4 digit sequence number  
    Station Number STORET station number (If available)  
    Date/Time Military time  
    For composite samples -- beginning date/time of first aliquot  
    Ending Date/Time Date/Time of last aliquot  
    Type See back of FSDCOCS  
    T - Time Aliquots taken at set frequency  
    S - Space -- Grabs over an area  
    F - Flow -- Variable time intervals  
    B - S&T  
    Frequency See back of FSDCOCS  
    Station Description Be specific
- 9 Codes See back of FSDCOCS
- 10 CHAIN OF CUSTODY Document POSSESSION of samples en route to Region 10 laboratory.  
If sent to another lab via common carrier, sign in "DISPATCHED BY" box.

(In many cases, samples are brought to the Region 10 office and picked up by someone for delivery to lab. In this case, the intermediate person should sign in "RECEIVED BY" box and also when RELINQUISHING the sample to the lab or when samples are DISPATCHED via common carrier to some other laboratory.)



EPA Region 10  
1200 Sixth Avenue  
Seattle WA 98101

# FIELD SAMPLE DATA AND CHAIN OF CUSTODY SHEET

① Project Code: TEC-094 A Account: TFA 10 PC  
② Name/Location: ABC Inc SEATTLE  
③ Project Officer: JON DOUGH

④ ☐ Enforcement/Custody

☐ Possible Toxic/Hazardous Notes:

☐ Data Confidential

☐ Data for Storet

CASE No: 1057

SAS No: 1234 J

⑥ Samplers: JON DOUGH

Second Sample taken

⑦ Recorder: Jon Dough  
(Signatures Required)

SOURCE CODE	MATRIX				CONTAINERS & PRESERV.				LAB NUMBER			STATION NUMBER			DATE				COMPOSITE ONLY						STATION DESCRIPTION		
	Water	Sediment	Tissue	Oil	Unpres	H <sub>2</sub> SO <sub>4</sub>	HNO <sub>3</sub>			Yr	Wk	Seq				Yr	Mo	Dy	Time	ENDING DATE			Type	Freq			
																				Mo	Dy	Time					
		X			3	1				84	49	51	50				84	12	07	09	15					FIELD TRANSFER BLANK - ABC INC	
34		X			3	1				84	49	51	51	J	15	96	84	12	07	09	30					ABC INC Secondary Effluent -	
49		X			1					84	49	51	52	D	30	00	84	12	07	10	00					ABC INC - SOIL next to #5 Tank Outlet Valve	
34		X			3	1				84	49	51	53				84	12	07	10	15	12	08	09	15	T24	ABC INC - Secondary Effluent
71			X		1					84	49	51	70				84	12	07	13	15					ENGLISH SOLE - EAGLE HARBOR #12A	
42		X			1					84	49	51	71				84	12	07	14	00					Eagle Harbor #37	

LAB NUMBER			DEPTH	COL MTD CD	QA CODE	TEMP DEG C	pH	CONDUCTIVITY umho/cm	MISCELLANEOUS	CHAIN OF CUSTODY RECORD		
Yr	Wk	Seq								⑩		
84	49	51	50		FXFR					RELINQUISHED BY: (Signature)	RECEIVED BY: (Signature)	DATE/TIME
84	49	51	51	21		26	7.2		90° V Notch 8" Head	RELINQUISHED BY: (Signature)	RECEIVED BY: (Signature)	DATE/TIME
84	49	51	52	10					TOP 6" of SOIL	RELINQUISHED BY: (Signature)	RECEIVED BY: (Signature)	DATE/TIME
84	49	51	53	21		20	7.4			RELINQUISHED BY: (Signature)	RECEIVED BY: (Signature)	DATE/TIME
										RELINQUISHED BY: (Signature)	REC'D BY MOBILE LAB FOR FIELD ANAL.: (Signature)	DATE/TIME
										DISPATCHED BY: (Signature)	DATE/TIME	RECEIVED FOR LAB BY: (Signature) DATE/TIME
										METHOD OF SHIPMENT		

See back of sheet

Laboratory Copy  
White

Project Officer Copy  
Yellow

Field or Office Copy  
Pink

## ANALYSIS REQUEST SHEETS

These forms must be used when submitting samples to the EPA Laboratory.  
Analysis request sheets are available from Joyce Crosson or the laboratory.

Examples are shown for the available Analysis Request Sheets.

- |   |                |                              |
|---|----------------|------------------------------|
| 1 | Project Name   | Enter Project Name           |
| 2 | Project Code   | Enter Code                   |
| 3 | Account Code   | Enter Code                   |
| 4 | Sample Numbers | Enter 8 digit EPA lab number |
| 5 | Matrix Codes   | Circle as appropriate        |

**PHYSICAL & GENERAL INORGANICS AND  
ION CHROMATOGRAPH**Project Name: ABC InkProject Code: TEC-094AAccount Code: TFA 10PC**Matrix Codes** (circle one only)

- 10 Water-Total  
11 Water-Dissolved  
40 Sediment/Soil  
45 Semi-Solid/Sludge  
46 Sediment for EP Toxicity  
70 Tissue  
80 Oil/Solvent  
00 Other

**Sample Numbers**Analy/Con  
Init/Date**Physical & General  
Inorganics WG (10)**

Turbidity	TURB
pH (Lab)	pH
Conductivity	COND
Total Alkalinity	T ALK
Total Hardness	T HARD
Bicarbonate	HCO3
Calcium	Ca
Carbonate	CO3
Chloride	Cl
Fluoride	F
Sulfate	SO4-TOT
Sulfide	S
Cyanide	CN
Acidity	Acidity
Hardness	CaCO3
Color	Color

**Ion Chromatograph WG (80)**

Calcium	Ca
Chloride	Cl
Cyanide	CN
Fluoride	F
Magnesium	Mg
Potassium	K
Sodium	Na
Sulfate	SO4
Nitrate	NO3
Nitrite	NO2
Ortho Phosphorous	O-Phos.

Save samples after analysis? **NONE, SOME** or **ALL**. (If **SOME**, circle sample numbers.)

Special detection limits and comments:

Project Officer Signature

Date

## OXYGEN DEMAND, SOLIDS AND NUTRIENTS

Project Name: **ABC Inc**Project Code: **TEL-094 A**Account Code: **TFA 10 PC**

Matrix Codes (circle one only)

- Water-Total  
Water-Dissolved  
Sediment/Soil  
Semi-Solid/Sludge  
Sediment for EP Toxicity  
Tissue  
Oil/Solvent  
Other

Sample Numbers

Analy/Comp  
Init/Date

## Oxygen Demand &amp; Carbon WG (18)

- Bio. Oxygen Demand BOD/5 day  
Bio. Oxygen Demand BOD/20 day  
Bio. Oxygen Demand BOD/60 day  
Bio. Oxygen Demand (5-day) Carbonaceous BOD/5 day-C  
Chem. Oxygen Demand COD  
Total Organic Carbon TOC

## Solids WG (15)

- Total Dissolved TDS  
Total Sus. Solids SS  
Total Solids TS  
Volatile TVS  
Volatile Suspended TVSS  
Settleable Solids SetSlds  
% Total Solids % Tot  
% Volatile Solids % V Slds  
Grain Size Grn Siz

## Nutrients WG (20)

- Ammonia NH3  
\*Nitrate NO3  
\*Nitrite NO2  
Nitrate + Nitrite NO3 + NO2  
Kjeldahl Kjel-N  
Total Phosphorous T-Phos  
Dissolved Phosphorous D-Phos  
\*Ortho Phosphorous O-Phos  
Dissolved Orth. Phos. D-O Phos

\*Parameters may also be analyzed via the Ion Chromatograph workgroup methodology.

Save samples after analysis? **NONE, SOME or ALL.** (If SOME, circle sample numbers.)

Special detection limits and comments:

Project Officer Signature

Date

## METALS

Project Name: ABC INC Project Code: TEL-094A Account Code: TFA 10PC

**Matrix Codes** (circle one only)

- 10 Water-Total
- 11 Water-Dissolved
- 40 Sediment/Soil
- 45 Semi-Solid/Sludge
- 46 Sediment for EP Toxicity
- 70 Tissue
- 80 Oil/Solvent
- 00 Other

**Metals** (circle WG #)

Workgroup 30 - Standard Method  
Workgroup 34 - EP Toxicity Method

[illegible]

Save samples after analysis? **NONE, SOME** or **ALL**. (If **SOME**, circle sample numbers.)

*Special limits, methods and comments:*

Project Officer Signature

Date

## PRIORITY POLLUTANTS - ORGANICS

Project Name: **ABC INC**Project Code: **TEL-094 A**Account Code: **TFA 10 PC**

## Matrix Codes (circle one only)

- ☒ 10 Water-Total  
☐ 11 Water-Dissolved  
☐ 40 Sediment/ Soil  
☐ 45 Semi-Solid/ Sludge  
☐ 46 Sediment for EP Toxicity  
☐ 70 Tissue  
☐ 80 Oil/ Solvent  
☐ 00 Other

## Sample Numbers

Analy/Comp  
Init/Date

## GC/MS Organic Scans

- 68 Base/Neutrals/Acids B/N/A  
62 Base/Neutrals Only B/N  
51 Volatile Organics VOA  
65 Acids Only Acid  
Specific (GC/MS) Organics List Below

## GC Organic Scans

- 71 Pesticide/PCB's Pest/PCB  
74 PCB's Only PCB  
54 Purgeable Halocarbons Purg  
53 Trihalomethanes Trihal  
73 Herbicides Herb  
70 Chlorinated Hydrocarbons  
70 Organophosphate Pesticides  
Specific (GC) Organics List Below

Specific Organics at  
Other Miscellaneous

- 67 PolyAromHydro (HPLC) PAH  
40 Oil Identification Oil-Id  
40 Phenolics (AAP) Phenol  
40 Oil & Grease Oil & Greas  
40 Flashpoint Flashpt

Save samples after analysis? NONE, SOME or ALL. (If SOME, circle sample numbers.)

Special detection limits and comments:

Project Officer Signature

Date



## INSTRUCTIONS FOR COMPLETION OF ORGANICS TRAFFIC REPORT

This form is used only when:

- A. Routine Analytical Services (RAS) from a contract lab are required
- B. Both RAS and Special Analytical Services are required  
(If only SAS are required, an SAS Packing List is used rather than an OTR.)

When OTR is completed -- KEEP PINK copy for EPA files  
Send WHITE ORIGINAL to Sample Management Office  
Send WHITE COPY+YELLOW to Contract Lab

- |    |                       |  |
|----|-----------------------|--|
| 1  | Case Number           | Enter the Case Number - usually 4-digits and/or the SAS Number - usually 4-digits followed by a "J" for Region 10.   |
|    | Sample Site Name/Code | Enter name of Facility or Project associated with samples  |
| 2  | Concentration         | Environmental samples usually are LOW concentration. This should be determined in advance of the sampling activity since it will affect handling and shipment.   |
| 3  | Matrix                | As appropriate   |
| 4  | Ship To               | Name of contract laboratory and contact person   |
| 5  | Regional Office       | 10   |
| 6  | Sample Type           | As appropriate<br>The peel-off labels are placed on the sample jars and lids if space allows. Place labels on jars and lids BEFORE sampling. Use the appropriate peel off labels for the sample analyses to be completed. These labels are the only identification needed on the bottles but in addition, sample tags may also be filled out and attached to the bottles if desired. |
| 7  | Shipping Information  | As requested   |
| 8  | Sample Description    | Check as appropriate   |
| 9  | Sample Location       | Enter the specific sampling location   |
| 10 | Special Handling      | Use this area for requesting the sample analyses to be completed.  |

# ORGANICS TRAFFIC REPORT

J 1596

Case Number:

1057

# 1234 J

Sample Site Name/Code:

BC INC

SEATTLE

② SAMPLE CONCENTRATION  
(Check One)

☒ Low Concentration  
☐ Medium Concentration

④ Ship To:

CLOSE ENOUGH LABS  
 ADDRESS

Attn: CONTACT NAME

Transfer

Ship To:

Regional Office: 10

Sampling Personnel:

ON DOUGH

(Name)

06-442-1200

(Phone)

Sampling Date:

2/7/84 0930

(Begin)

(End)

⑥ For each sample collected specify number of containers used and mark volume level on each bottle.

	Number of Containers	Approximate Total Volume
Water (Extractable)	1	1 GAL
Water (VOA)	2	80 ml

J 1596 - Water (Extractable)

J 1596 - Water (Extractable)

J 1596 - Water (Extractable)

J 1596 - Water (Extractable)

Shipping Information

FEDERAL EXPRESS

Name of Carrier

12/7/84

Date Shipped:

123456 B

Airbill Number:

Soil/Sediment

Water (Ext/VOA)

Other

J 1596 - Water (VOA)

J 1596 - Water (VOA)

J 1596 - Soil/Sediment (Ext & VOA)

J 1596 - Soil/Sediment (Ext & VOA)

J 1596 - Water (Ext & VOA)

J 1596 - Water (Ext & VOA)

⑧ Sample Description

☐ Surface Water ☐ Mixed Media

☐ Ground Water ☐ Solids

☐ Leachate ☒ Other (specify) EFFLUENT

⑨ Sample Location

SECONDARY EFFLUENT @  
 V-NOTCH WEIR

⑩ Special Handling Instructions:  
 (e.g., safety precautions, hazardous nature)

ANALYSES REQUIRED:  
 BASE NEUTRALS  
 ACID EXTRACTABLES  
 PESTICIDES  
 VOA

## INORGANICS TRAFFIC REPORT

This form is USED when shipping samples to a CONTRACT laboratory for analysis of INORGANICS.

When completed --    Keep PINK  
                              Send WHITE original to Sample Management Office  
                              Send WHITE copy + YELLOW to contract lab

- |   |                                      |  |
|---|--------------------------------------|--|
| 1 | Case Number<br>Sample Site Name/Code | Enter case Number<br>Enter Station name/location   |
| 2 | Concentration                        | As appropriate -- usually determined prior to sampling   |
| 3 | Matrix                               | As appropriate   |
| 4 | Ship to                              | Name/address of Contract lab   |
| 5 | Sampling Office                      | As appropriate   |
| 6 | Shipping Info                        | Usually Federal Express -- normally the airbill number is not completed since forms should be packed inside shipping containers  |
| 7 | Sample description                   | As appropriate   |
| 8 | Mark Volume level                    | Use grease pencil if possible  |
| 9 | Peel-Off Labels                      | Put a peel-off label on the LID and on the BOTTLE. This is usually for Tasks 1 & 2. <u>Bottles and lids must be dry for labels to adhere properly.</u> If Task 3 is required, also use the Task 3 label in addition to the Task 1 & 2 label. |



U.S. ENVIRONMENTAL PROTECTION AGENCY HWI Sample Management Office

P.O. Box 2815 Alexandria, VA 22304-7118 SSF 2491-FIS SSF 2431

# INORGANICS TRAFFIC REPORT

Sample Number

**MJ 0911**

1) Case Number: 1057  
Sample Site Name/Code:  
ABC Inc, Seattle  
Secondary Effluent

2) SAMPLE CONCENTRATION  
(Check One)  
☒ Low Concentration  
☐ Medium Concentration  
3) SAMPLE MATRIX  
(Check One)  
☒ Water  
☐ Soil/Sediment

4) Ship To:  
CONTRACT LAB

Attn: CONTACT

Transfer  
Ship To:

5) Sampling Office: REGION 10  
Sampling Personnel:  
(Name) JOE DOUGH  
(Phone) 206-442-1200  
Sampling Date:  
(Begin) 12/7/84 (End) 12/7/84

6) Shipping Information:  
Name Of Carrier:  
FEDERAL EXPRESS  
Date Shipped: 12/7/84  
Airbill Number: 155

MJ 0911 - Task 1 & 2

MJ 0911 - Task 1 & 2

MJ 0911 - Task 3

MJ 0911 - Task 3

MJ 0911 - Task 3

MJ 0911 - Task 3

MJ 0911 - Task 3

7) Sample Description:  
(Check One)  
☐ Surface Water  
☐ Ground Water  
☐ Leachate  
☐ Mixed Media  
☒ Solids  
☒ Other EFFLUENT  
(specify)

8) Mark Volume Level  
On Sample Bottle  
Check Analysis required  
☒ Task 1 & 2  
☐ Task 3 Ammonia  
Sulfide  
Cyanide

ATCHES ORGANIC SAMPLE NO. J1596

SMO COPY

## PACKING LIST

This form is used only if:

\* Special Analytical Services (SAS) are the only analytical services that have been requested. It is NOT used if Routine Analytical Services (RAS) or RAS + SAS are required.

When completed -- Keep YELLOW  
Send WHITE to SMO  
Send PINK + GOLD to Contract Lab

- |   |   |   |
|---|---|---|
| 1 | SAS   | Enter the SAS number - obtain through Joyce Crosson   |
| 2 | Sampling Office<br>Sampling Contact<br>Phone<br>Sampling Date<br>Date Shipped<br>Site Name Code<br><br>Ship To<br>Lab Contact | Region 10<br>Project Officer<br>Project Officer phone<br>Sampling Date<br>Date Shipped<br>Leave blank or enter the project code number obtained from Joyce Crosson<br>Name of Contract Lab<br>Name of person at Lab |
| 3 | Sample Number   | Enter the EPA Region 10 lab number assigned on the Field Sample Data and Chain of Custody Sheet. (Note: all samples should be assigned a Region 10 lab number regardless of the analytical laboratory.)             |
| 4 | Concentration   | enter MEDIUM or LOW<br>(This will normally have been determined in advance of the sampling)   |
|   | Matrix  | Next enter SOIL, WATER, OR TISSUE   |
|   | Sample Description  | Complete Sample description   |

U.S. ENVIRONMENTAL PROTECTION AGENCY  
SLP Sample Management Office  
P.O. Box 818 - Alexandria, Virginia 22313  
Phone: 703/557-2490 - FTS/557-2490

①

SAS Number  
1234 J

SPECIAL ANALYTICAL SERVICE  
PACKING LIST

②

Sampling Office: <u>REGION 10</u>	Sampling Date(s): <u>12/7/84</u>	Ship To: <u>CONTRACT LAB</u> <u>NAME/ADDRESS</u>	For Lab Use Only
Sampling Contact: <u>JON DOUGH</u> (name)	Date Shipped: <u>12/7/84</u>		Date Samples Rec'd: _____
<u>206-442-1200</u> (phone)	Site Name/Code: _____	Attn: <u>LAB CONTACT</u>	Received By: _____

③

Sample  
Numbers

④

Sample Description  
i.e., Analysis, Matrix, Concentration

Sample Condition on  
Receipt at Lab

1. <u>84495152</u>	<u>MEDIUM SOIL next to #5 TANK OUTLET VALVE</u>	
2. _____	_____	_____
3. _____	_____	_____
4. _____	_____	_____
5. _____	_____	_____
6. _____	_____	_____
7. _____	_____	_____
8. _____	_____	_____
9. _____	_____	_____
10. _____	_____	_____
11. _____	_____	_____
12. _____	_____	_____
13. _____	_____	_____
14. _____	_____	_____
15. _____	_____	_____
16. _____	_____	_____
17. _____	_____	_____
18. _____	_____	_____
19. _____	_____	_____
20. _____	_____	_____

For Lab Use Only

White - SMO Copy, Yellow - Region Copy, Pink - Lab Copy for return to SMO, Gold - Lab Copy

## DIOXIN SHIPMENT RECORD

This form is used when shipping samples for DIOXIN analysis at a contract lab.

When completed -- KEEP YELLOW  
Send WHITE to SAMPLE MANAGEMENT OFFICE  
Send PINK + GOLD to Contract Lab

- 1 Case Number Enter Case Number  
  
Batch Number Enter 1 -- If a second sheet is required -  
enter 2 on the second sheet. See SMO  
version of instructions for this sheet for  
more detail.
- 2 Site Number  
City/State  
EPA Site Number Leave Blank  
Latitude/Longitude/Tier Fill in only for National Dioxin Sampling  
Program samples  
Sampling Office 10  
Sampling Contact Project Officer  
Data Turnaround Usually 40 days -- determine prior to  
sampling
- 3 Sample Numbers Enter the number shown on the peel-off  
labels. There should be 2 peel-off labels  
with the same number. One goes on the LID,  
the other on the BOTTLE.  
  
Enter this number also on the Field Sample  
Data and Chain of Custody Sheet.

①

BATCH NO:

②

DJ 0046 01 -DIOXIN  
DJ 0046 02 -DIOXIN  
DJ 0046 03 -DIOXIN  
DJ 0046 04 -DIOXIN  
DJ 0046 05 -DIOXIN  
DJ 0046 06 -DIOXIN  
DJ 0046 07 -DIOXIN  
DJ 0046 08 -DIOXIN  
DJ 0046 09 -DIOXIN  
DJ 0046 10 -DIOXIN  
DJ 0046 11 -DIOXIN  
DJ 0046 12 -DIOXIN  
DJ 0046 13 -DIOXIN  
DJ 0046 14 -DIOXIN  
DJ 0046 15 -DIOXIN  
DJ 0046 16 -DIOXIN  
DJ 0046 17 -DIOXIN  
DJ 0046 18 -DIOXIN  
DJ 0046 19 -DIOXIN  
DJ 0046 20 -DIOXIN  
DJ 0046 21 -DIOXIN  
DJ 0046 22 -DIOXIN  
DJ 0046 23 -DIOXIN  
DJ 0046 24 -DIOXIN

**ADD'L  
ANALYSIS**

③

DG004601

[illegible]

**GOLD—Lab Copy**



U.S. ENVIRONMENTAL PROTECTION AGENCY  
Contract Laboratory Program

SAMPLE MANAGEMENT OFFICE

MEMORANDUM

DATE: July 6, 1984  
TO: Primary Regional Sample Control Center Contacts  
FROM: Linda Haas  
Sample Management Office *Linda Haas*  
SUBJECT: Dioxin Shipment Records

Attached please find a supply of the new Dioxin Shipment Records (DSR) and an instruction document for distribution to the CLP users in your Region. The DSR replaces the SAS Packing List which was used as an interim Dioxin Shipment Record. Use of the SAS Packing List for RAS Dioxins is to be discontinued at this time.

In addition to the DSR we will be supplying each Region with preprinted sample labels. Each duplicate set of labels will consist of twenty-four (24) sample numbers corresponding to a batch shipment (e.g., DA000101 through DA000124). I hope to have the labels ready for distribution in August.

If you or any of your users have questions about the use of the DSR, please feel free to call me at telephone number FTS-557-2490, 703/557-2490, or 703/683-0885.

cc: RSCC's (memo and one form)  
Stan Kovell, CLP Program Manager  
Fred Haeberer, CLP Project Officer  
Joan Fisk, CLP Project Officer  
Ross Robeson, EMSL/LV  
Rob Laidlaw, NEIC  
Dick Thacker, SMO Deputy Project Manager  
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## DIOXIN SAMPLE DOCUMENTATION AND SHIPMENT INSTRUCTIONS

July 1984

### Instructions for Completing DSR Form

A separate Dioxin Shipment Record (DSR) form is to be completed for each shipment of samples to a laboratory. First, enter the Case number on the top right corner of the DSR form, where indicated. The Case number is the identifying number that was assigned by SMO at the time the sampling was scheduled. This is followed by the Batch number, which is assigned by the sampler when samples are packed for shipment to the laboratory(ies).

The Batch number represents represents one shipment of up to twenty-four (24) samples from one specific location to one laboratory on one day and is assigned sequentially. For example, the first shipment of samples in a Case would be identified as Batch #1, the second shipment would be Batch #2, etc. When sampling occurs over several days, care must be taken not to repeat Batch numbers within the Case.

The use of Batch numbers allows for identification of groups of samples within a Case that are shipped to different laboratories and/or that are shipped on different days. The Batch number may also be used to signify a group of samples collected at a specific location within the overall site perimeter, should the site encompass a large geographical area.

Next, complete header information, excluding the areas on the top right of the form that are set off by bold lines. These areas are for laboratory use.

Make sure to mark either 15-day or 30-day data turnaround requirement, indicating the delivery terms arranged when scheduling the analyses with SMO.

Along with the DSR forms, the Region has two sets of labels bearing sample numbers. Two strips of labels containing the same series of 24 sample numbers are provided for use in labeling the sample bottles and the outer metal cans in which samples are packaged for shipment. The same numbered label must be placed on both the sample bottle and the outer metal can. In order to protect the labels from water or solvent attack, labels on both the sample container and the outer metal can should be covered with clear, waterproof tape.

Enter the Sample numbers (from the labels) on the lower left side of the DSR form, where indicated. Record all Sample numbers for samples included within the Batch shipment. (Extra numbered labels from the original strips of 24 should be discarded and new strips of labels should be used for the next Batch samples.)

For each sample, indicate sample matrix and description by checking the appropriate box in each category. There is also a block for indicating that additional analysis under Special Analytical Services is required for a sample. Check this block, if appropriate, and specify type of additional analysis required. (Any additional analytical work must be requested through SMO at the time sampling is scheduled, to ensure that proper arrangements can be made in advance to accommodate the request.)

After completion of the SMO DSR form, the bottom two copies of the completed DSR (pink and gold copies) are included with the sample shipment to the laboratory. The DSRs, as well as chain-of-custody documentation accompanying the sample shipment, should be enclosed in a clear plastic bag and securely taped to the underside of the lid of the shipping cooler.

Following sample shipment, distribute remaining DSR copies as follows:

- o Mail top (white) copy to SMO at the address shown on the top of the DSR form.
- o Second (yellow) copy of DSR form is retained by the sampler as the Region's file copy.

### Procedures for Coordinating Sample Shipment

Immediately following sample shipment, call SMO, as appropriate, and provide the following information:

- o Sampler name
- o Batch number(s)
- o Total number of samples included in each Batch
- o Date of shipment
- o Courier name and airbill number
- o Type of shipment (e.g., overnight, two-day)
- o Laboratory samples shipped to
- o Any irregularities or anticipated problems with the samples
- o Status of sampling project (e.g., final shipment, update of future shipping schedule)

SMO notifies the laboratory that samples are in transit and confirms arrival of the samples in good condition at the receiving laboratory. SMO assists in resolution of any problems concerning the samples, coordinating with the appropriate Regional or sampling personnel.

Upon sample receipt, the laboratory completes designated sections of the DSR, recording date of sample receipt and sample condition, signs the DSR, and returns a copy to SMO. SMO retains the laboratory-signed DSR copy as written confirmation of sample receipt.

CASE NO: 2000 BATCH NO: 1

CLP DIOXIN SHIPMENT RECORD

Site Name: <b>NAME</b>	Sampling Office: <b>REGION</b>	Ship To: <b>LAB</b>
City & State: <b>City Name, ST.</b>	City & State: <b>City Name, ST.</b>	<b>ATTN</b>
EPA Site No: <b>MOD 1234567F9</b>	Sampling Contact: <b>NAME</b> (name)	Date Shipped: <b>MM-DD-YY</b>
Latitude: <b>7 digit No.</b>	Sampling Date: <b>MM-DD-YY</b>	
Longitude: <b>8 digit No.</b>	Data Turnaround:	
Tier: ① 2 3 4 5 6 7 (circle one)	15-Day _____ 30-Day <input checked="" type="checkbox"/>	

SAMPLE NUMBERS	MATRIX		DESCRIPTION						ADD'L ANALYSIS
	SOIL/ SEDIMENT	OTHER: solvent	FIELD SAMPLE	SAMPLE TO DUPLICATE	SAMPLE TO SPIKE	BLANK	EQUIPMENT RINSATE	OTHER: (SAS ONLY)	SPECIFY: (SAS ONLY)
DG000101	✓		✓						
DG000102	✓		✓						
DG000103	✓		✓						
DG000104		✓					✓		
DG000105	✓		✓						
DG000106	✓			✓					
DG000107	✓		✓						
DG000108	✓		✓						
DG000109	✓		✓						
DG000110	✓		✓						
DG000111	✓				✓				
DG000112	✓		✓						
DG000113	✓		✓						
DG000114	✓		✓						
DG000115	✓		✓						
DG000116	✓		✓						
DG000117	✓		✓						
DG000118	✓		✓						
DG000119	✓					✓			
DG000120	✓		✓						
DG000121	✓		✓						
DG000122	✓		✓						
DG000123	✓		✓						
DG000124	✓		✓						

WHITE—SMO Copy YELLOW—Region Copy PINK—Lab Copy for Return to SMO GOLD—Lab Copy

## 7.0 SAMPLE PACKAGING AND SHIPPING

### 7.1 Sample Packaging

#### 7.1.1 Environmental Samples (low level)

- Not expected to be grossly contaminated with high levels of hazardous materials. Estimated to contain less than 10ppm of any contaminant.
- a. Secure sample container lid and place it, properly identified, in a polyethylene bag and seal the bag.
- b. Place the sample in a metal picnic cooler which has been lined with a large polyethylene bag.
- c. Pack the cooler with enough noncombustible, absorbant, cushioning material to guard against container breakage.
- d. Seal the large bag.
- e. Documentation accompanying the shipment must be enclosed in a waterproof plastic bag and taped to the underside of the cooler lid.
- f. Secure the cooler lid shut with fiber tape and custody seal tape.
- g. Print "Environmental Samples" and "This End Up" on top of the cooler and put upward pointing arrows on all four sides.

#### 7.1.2 Hazardous Material Samples

- Samples suspected of containing concentrations of contaminants of 10ppm to 15% (medium level) or greater than 15% (high level).
- a. These samples when being transported by other than a government vehicle must be packaged, marked, labeled, and shipped according to DOT regulations.
- b. Most hazardous samples are classified as flammable liquid or flammable solid shipments and require the following packaging procedure:
  - 1) Place the sample container, properly identified, in a polyethylene bag and seal the bag.
  - 2) Place the sample in a metal can, cushion it with vermiculite and secure the can lid tightly with clips or tape.
  - 3) On the metal can print or in label form show the Laboratory name and address and "Flammable Liquid, n.o.s. UN 1993" or "Flammable Solid, n.o.s. UN 1325."
  - 4) Place the metal can(s) into the plastic bag lined cooler, surround the can(s) with vermiculite, and seal the outer plastic bag.
  - 5) Documentation accompanying the shipment must be enclosed in a waterproof plastic bag and taped to the underside of the cooler lid.
  - 6) Secure the cooler lid shut with fiber tape and custody seal tape.
  - 7) The following DOT labels should be placed on top of the cooler: "Flammable Liquid, n.o.s." or "Flammable Solid, n.o.s.". A "Cargo Aircraft Only" label is needed if the net sample quantity is greater than 1 quart (liquid) or 25 pounds (solid).
  - 8) Print "Laboratory Samples" and "This End Up" on top of the cooler and put upward pointing arrows on all four sides.

## 7.2 Sample Shipping

### 7.2.1 Environmental vs/ Hazardous Sample Shipment

#### a. Environmental Samples

- No DOT marking, labeling, or shipping papers are required, nor are there any DOT restrictions on the mode of transportation.

#### b. Hazardous Samples - medium and high concentrations

- 1) Complete a carrier approved airbill or Shippers Certification for Restricted Articles providing the following information in the order listed:
  - "Flammable Liquid, n.o.s. UN 1993" or "Flammable Solid, n.o.s. UN 1325"
  - "Limited Quantity" (or "Ltd. Qty.")
  - Net weight or net volume of total sample material in cooler
  - "Laboratory Samples"
  - "Cargo Aircraft Only"
- 2) Ship by airlines that ONLY carry cargo such a Federal Express, Emory, etc.
- 3) DOT regulations do not apply to transport by government owned vehicles, including aircraft.



PLEASE COMPLETE ALL INFORMATION IN THE 5 BLOCKS OUTLINED IN ORANGE  
SEE BACK OF FORM SET FOR COMPLETE PREPARATION INSTRUCTIONS.

293233474



YOUR FEDERAL EXPRESS ACCOUNT NUMBER  
123456-7

DATE  
5/19/86

TO (Recipient's Name)  
JACK D. SAMPLER

If Hold For Pick-Up or Saturday Delivery,  
Recipient's Phone Number

DEPARTMENT/FLOOR NO.  
DIRT DETECTIVES, INC.

COMPANY  
PRECISION LABORATORIES

STREET ADDRESS (P.O. BOX NUMBERS ARE NOT DELIVERABLE)  
87 CLEAN ROSE DR.

STREET ADDRESS (P.O. BOX NUMBERS ARE NOT DELIVERABLE)  
1032 LABRADOR DR.

CITY  
BOZEMANVILLE, WA

CITY  
CLEANWATER, OR

293233474

ZIP 98188

IN TENDERING THIS SHIPMENT, SHIPPER AGREES THAT  
F.E.C. SHALL NOT BE LIABLE FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES ARISING FROM

ZIP 98202

REFERENCE NUMBERS (FIRST 12 CHARACTERS WILL ALSO APPEAR ON INVOICE)

CARRIAGE HEREOF, F.E.C. DISCLAIMS ALL WARRANTIES, EXPRESS OR IMPLIED, WITH RESPECT TO THIS SHIPMENT. THIS IS A NON-NEGOTIABLE AIRBILL SUBJECT TO CONDITIONS OF CONTRACT SET FORTH ON REVERSE OF SHIPPER'S COPY. UNLESS YOU DECLARE A HIGHER VALUE, THE LIABILITY OF FEDERAL EXPRESS CORPORATION IS LIMITED TO \$100.00. FEDERAL EXPRESS DOES NOT CARRY CARGO LIABILITY INSURANCE.

FEDERAL EXPRESS USE

Bill Shipper ☐ Bill Recipient's F.E.C. Acct. ☒ Bill 3rd Party F.E.C. Acct. ☐ Bill Credit Card

FREIGHT CHARGES

Cash In Advance Account Number/Credit Card Number

DECLARED VALUE CHARGE

SERVICES  
CHECK ONLY ONE BOX  
1 ☐ HOLD FOR PICK-UP AT FOLLOWING FEDERAL EXPRESS LOCATION SHOWN IN SERVICE GUIDE. RECIPIENT'S PHONE NUMBER IS REQUIRED.

AGT/PRO ADVANCE ORIGIN

AGT/PRO ADVANCE DESTINATION

2 ☒ DELIVER  
3 ☐ SATURDAY SERVICE REQUIRED (See Reverse (Extra charge applies for delivery.)

TOTAL TOTAL TOTAL

OTHER

4 ☒ RESTRICTED ARTICLES SERVICE (P-1 and Standard Air Packages only, extra charge)  
5 ☐ SSS (Signature Security Service required, extra charge applies)

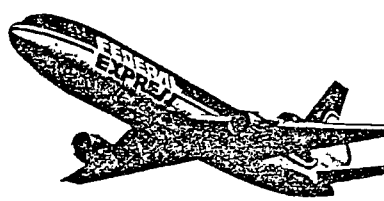
RECEIVED AT  
SHIPPER'S DOOR  
☐ REGULAR STOP  
☐ ON-CALL STOP  
☐ F.E.C. LOC.

TOTAL CHARGES

6 ☐ DRY ICE LBS.  
7 ☐ OTHER SPECIAL SERVICE

Federal Express Corporation Employee No.

DATE/TIME For Federal Express Use



PART #2041730764  
REVISION DATE 10/82  
PRINTED U.S.A.

AIRBILL NUMBER

3233474

SHIPPER'S CERTIFICATION FOR RESTRICTED ARTICLES  
(TYPE OR PRINT)

PROPER SHIPPING NAME CLASSIFICATION IDENTIFICATION NO. NET QUANTITY PER PACKAGE

FLAMMABLE LIQUID, N.O.S. UN 1993  
LIMITED QUANTITY LABORATORY SAMPLES

16 oz.

CARGO AIRCRAFT ONLY

RADIONUCLIDE	FORM	ACTIVITY	CATEGORY OF LABELS	TRANS. INDEX	PACKAGE IDENTIFICATION

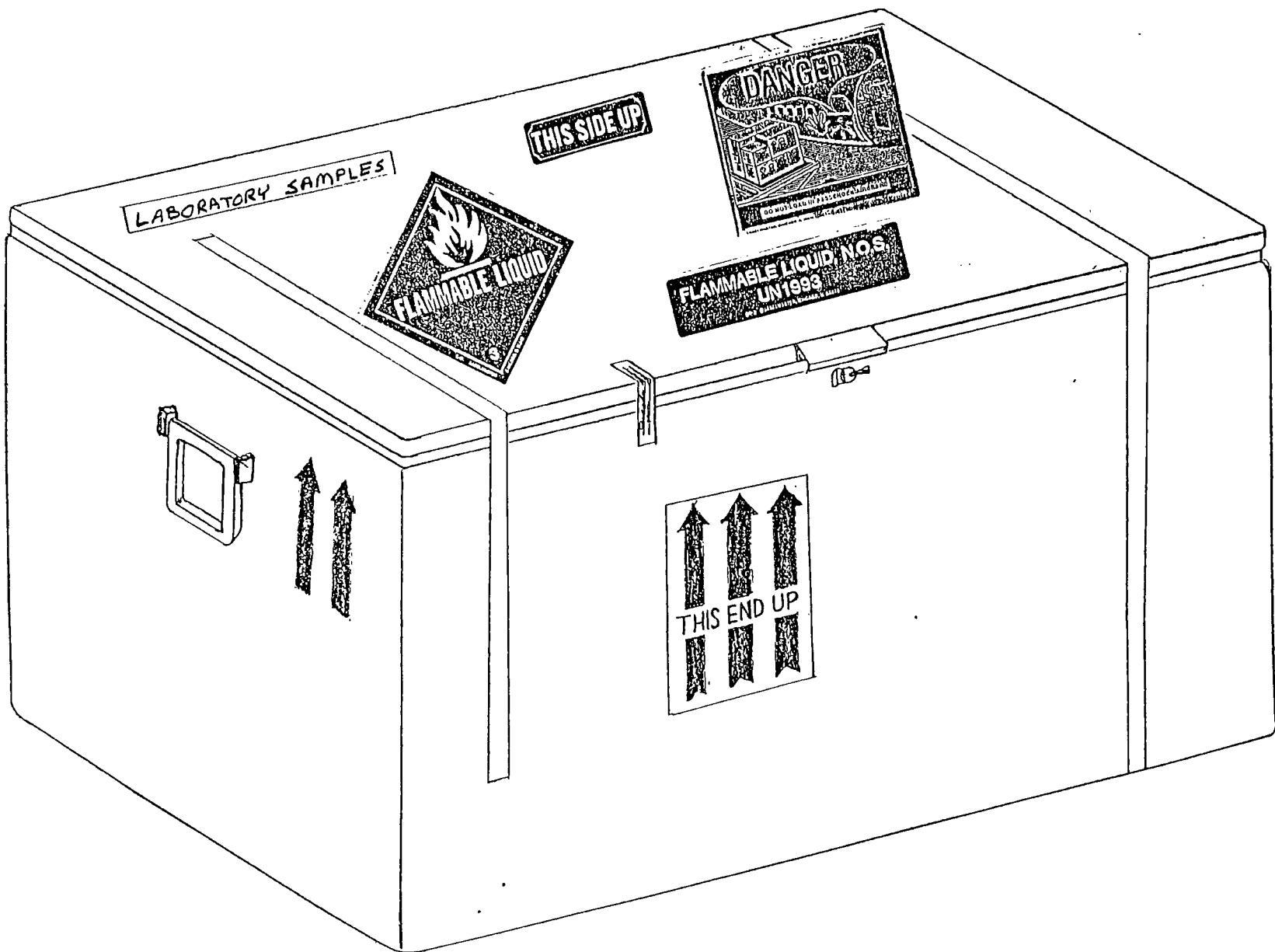
SHIPMENT IS WITHIN THE LIMITATIONS PRESCRIBED FOR PASSENGER AIRCRAFT ☒ CARGO AIRCRAFT ONLY ☐ DELETE-NONAPPLICABLE

ACCEPTABLE FOR PASSENGER AIRCRAFT, THIS SHIPMENT CONTAINS RADIOACTIVE MATERIAL INTENDED FOR USE IN, OR INCIDENT TO, RESEARCH, MEDICAL DIAGNOSIS OR TREATMENT.

HEREBY CERTIFY THAT THE CONTENTS OF THIS CONSIGNMENT ARE FULLY AND ACCURATELY DESCRIBED ABOVE BY PROPER SHIPPING NAME AND ARE CLASSIFIED, PACKED, MARKED, AND LABELED, AND IN PROPER CONDITION FOR CARRIAGE BY AIR ACCORDING TO APPLICABLE NATIONAL GOVERNMENTAL REGULATIONS.

NAME AND TITLE OF PERSON SIGNING CERTIFICATION: JACK D. SAMPLER - DETECTIVE  
EMERGENCY TELEPHONE NO.: 206 442-9999  
SIGNATURE OF SHIPPER: Jack D. Sampler





## 8.0 SHIPPING LOGISTICS AND NOTIFICATION

### 8.1 Shipping Logistics

- a. When making a shipment under \$150.00 with Alaska Airlines or Federal Express simply provide the carrier with their respective shippers account number (acquired from Andy Hess or Mary Moore) and the bill will go directly to the finance office.
- b. To use other airlines or when a charge exceeds \$150.00 use a Government Bill of Lading (GBL) acquired from Duane Taylor or prepare a Procurement Request (PR).
- c. We have established account numbers for Western, Horizon, Northwest Orient, and Republic airlines which can be used for billings less than \$150.00 provided a Procurement Request is completed and submitted to Mary Moore immediately upon shipment.
- d. It is prudent to take a GBL to the field for possible unforeseen needs. These are accountable forms and must be returned to the issuing officer if not used.
- e. Do NOT send shipments COD.
- f. If samples are not delivered directly to the lab, inform the carrier to "notify on arrival" and give them the lab's phone number (EPA lab 442-0370).
- g. RETURN your copy of the airbill to Mary Moore, M/S 337.

### 8.2 Sample Shipment Notification

- Immediately after delivering the shipment to the carrier, call the Sample Management Office (8 557-2490, CLP shipments) or the Manchester Lab (206 442-0370, or FTS 8 399-0370) and give the following information:
  1. Airbill number
  2. Name of carrier
  3. Exact number and type of samples, including QA samples
  4. Estimated date and time of arrival
  5. Any deviations from standard procedures

## U.S. GOVERNMENT BILL OF LADING

MEMORANDUM  
COPYB/L  
NO.

R-0639349

TRANSPORTATION  
COMPANY  
TENDERED TO

CONSOLIDATED FREIGHTWAYS

ROUTE ORDER/RELEASE NO.

STOP THIS CAR OR TRUCK AT

## IMPORTANT

Issuing office is to retain one  
memorandum copy and send  
one to the fiscal office.CAR-TRUCK-CONTAINER<sup>1</sup>

ORDERED

FURNISHED

MARKED CAPACITY<sup>2</sup>

ORDERED

FURNISHED

DATE  
FURNISHED<sup>3</sup>DATE B/L  
ISSUED

FOR

CAR, TRUCK OR CONTAINER INITIALS  
AND NO.

KIND

Receive  
named  
order  
destin  
like good

CFWY PRO NUMBER

DEST. SIC

050- 04160-0

BMW

CC

ORG. SIC CIRCLE ONE DEST. SIC

to conditions  
apparent good  
forwarded to  
be delivered inIf extra services are ordered see  
Administrative Directions No. 2 on reverse

FROM Andy Hess M/S 329/LAB

7411 Beach Dr.

(Shipping point) Port Orchard, WA 98366

FULL NAME OF SHIPPER

United States Environmental Protection Agency

CONSIGNEE (Name, address and ZIP code)

USEPA (Western Processing Test)  
200 SW 35th. Street c/o Bill Miller  
Corvallis, OR 97333 (no Saturday delivery)

DESTINATION (Name, address and ZIP code of installation)

U.S. Environmental Protection Agency  
200 SW 35th. St. c/o Bill Miller  
Corvallis, OR 97333 (no Saturday delivery)

VIA (Route shipment when advantageous to the Government)

MARKS

BILL CHARGES TO (Dept./agency, bureau/office, mailing address and ZIP code)

U.S. Environmental Protection Agency  
1200 Sixth Avenue, Finance, M/S 313  
Seattle, Wa. 98101-3188

APPROPRIATION CHARGEABLE

PEO087 PSGB10P616 2209 Approp. #6820X3145  
EST. \$40.00Contractor will return unused or canceled bills of lading to the Government of-  
fice from which received.

SEAL NUMBERS

FOR CARRIER'S USE ONLY — WAYBILL  
NO. OR FREIGHT BILL NO.

APPLIED BY:

050-04160-0

PACKAGES		DESCRIPTION OF ARTICLES (Use carrier's classification or tariff description if possible; otherwise use a clear nontechnical description.)	NUMBERS ON PACKAGES	WEIGHTS*
NO.	KIND			
2		Ice Chests containing environmental samples.		120 LBS
TARIFF OR SPECIAL RATE AUTHORITIES (CL, TL or Vol. only)				

If this shipment fully loads the car or truck used, check ☐ YES

CARRIER FURNISHED SERVICE AT ORIGIN

B/L NO.

☐ PICKUP ☐ TRAP-  
CAR Initials of  
shipper's agent:

R-0639349

FOR USE OF  
ISSUING  
OFFICE

CONTRACT OR PURCHASE ORDER NO. OR OTHER AUTHORITY

DATED

NAME OF  
TRANSPORTATION  
COMPANY

Consolidated Freightways

F.O.B. POINT NAMED:

ISSUING OFFICER (Name and title)

DATE

DATE OF RECEIPT OF SHIPMENT

Initial carrier's agent, by signature below,  
certifies he received the Original Bill of Lading.

Duane Taylor, Shipping Clerk

2/19/85

ISSUING OFFICE (Name and complete address)

SIGNATURE OF AGENT

PER

U.S. Environmental Protection Agency  
1200 6th Ave. M/S 349, Seattle, Wa. 98101-3188THIS CONSIGNMENT DELIVERED COMPLETE  
AND IN APPARENT GOOD ORDER EXCEPT  
AS MAY BE INDICATED HEREAFTER☐ SHORTAGE☐ DAMAGE☐ CARRIER OS30  
REPORT ATTACHEDSERVICE FURNISHED  
NATION

\*Show also cubic measurements for shipments via

## 9.0 EQUIPMENT CLEANING AND RETURN PROCEDURES

### 9.1 Sample Gear Cleaning Procedure

- a. Dispose of wood tongue depressors and other disposable sampling gear.
- b. If practical cover meters and samplers with clear plastic prior to use so that at the completion of work the plastic can be discarded minimizing followup cleaning.
- c. Clean meter and sampler housing with a mild detergent and wipe dry. Be careful not to get any electronic components wet.
- d. Basic cleaning procedure for sampling gear:
  - 1) Detergent wash and scrub if necessary
  - 2) Tap water rinse
  - 3) Acid (HCl and/or HNO<sub>3</sub>) rinse where there is heavy metal contamination\*
  - 4) Distilled water rinse
  - 5) Solvent (acetone and/or methylene chloride) rinse for non-plastic materials\*
  - 6) Air dry
- \* Wear neoprene gloves and allow for good ventilation
- e. A pressure steam cleaner is available for heavy duty cleaning
- f. Always clean gear ASAP after use

### 9.2 Sample Gear Return

1. Assure all meters and samplers are "off" and packed properly in their carrying cases if provided.
2. All gear is to be cleaned prior to return.
3. Return field gear, supplies, and unused sampling containers to: Andy Hess, Regional Field Equipment Center, EPA Region 10 Lab, 7411 Beach Dr. E., Port Orchard, WA, 98366.
4. If the field gear is not to be directly delivered to the lab, specify the carrier to "notify on arrival, Andy Hess 442-0370".
5. NEVER return sampling gear in the same cooler with samples.

## SECTION 10

### SAFETY AND HEALTH

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## 10.1 RIGHTS AND RESPONSIBILITIES

### 10.1.1 EMPLOYEE RIGHTS

- ° EPA employees are entitled to work under safe and healthful conditions, free of recognized hazards.
- ° If an investigation or inspection activity is unsafe, it should be postponed.
- ° EPA employees are entitled to have basic and when necessary specific safety and health training.
- ° Employees are entitled to personal protective clothing and equipment
- ° Field employees are entitled to participate in the occupational medical monitoring program.
- ° EPA employees are entitled to report hazardous working conditions, without any adverse consequences, and they have the right to make the reports anonymously if they wish.

#### References:

1. Occupational Safety and Health Act, Section 19
2. Presidential Executive Order 12196
3. EPA Occupational Health and Safety Manual



## 10.1.2 EMPLOYEE RESPONSIBILITIES

- ° Employees are responsible for complying with the Agency's health and safety standards and regulations.
- ° Employees are responsible for reporting accidents, injuries, and property damage of \$100.00 or more.
- ° Reporting unsafe and unhealthful working conditions
- ° Responsible for having a baseline medical examination to confirm their fitness for duty.
- ° Employees are responsible for using the safety clothing and equipment provided.
- ° Employees are responsible for reporting to work ready, willing and able to perform assigned duties.
- ° All employees are expected to observe all rules, signs, and instructions relating to personal safety.
- ° Willful non-observance of certain safety regulations constitute grounds for disciplinary action.

### 10.1.3 SUPERVISOR'S RESPONSIBILITIES

Supervisors are responsible for:

- ° The health and safety of their employees.
- ° Compliance with the Agency's Occupational Health and Safety requirements.
- ° For enforcing correct work practices.
- ° For providing safety and health training.
- ° For purchasing and providing personal protective clothing and equipment for their employees.

## 10.2 TRAINING REQUIREMENTS

### 10.2.1 EPA Order 1440.2 - Health and Safety Requirements for Employees Engaged in Field Activities

- ° Established three levels of training and certification commensurate with the degree of anticipated hazards.
- ° Requires all field employees have at least 3 days of health and safety training prior to becoming involved in normal, routine activities.
- ° Requires 8 hours of refresher training be given to field employees annually covering health and safety.
- ° Requires new employees to perform 3 days of field OJT within 3 months of classroom instruction.

### 10.2.2 Region 10 Policy on Health and Safety and Proficiency Training February 6, 1986.

- ° Establishes "program specific" health and safety training requirements for Region 10 Laboratory and field employees.
- ° Establishes a certification process for initial and refresher health and safety training requirements.
- ° Describes medical monitoring requirements for Region 10 field employees.
- ° Establishes non-compliance provisions for failure to satisfy the training requirements.
- ° This policy was designed to conform to the intent of EPA Order 1440.2 (July 12, 1981).
- ° Established a "Grandparent Clause" and requires full compliance by October 1, 1986.

### 10.2.3 Hazardous Materials Incident Response Training Program

As part of a comprehensive program for protecting the public and the environment from chemical incidents resulting from vehicle or train accidents, spills, discharges from industrial operations, and hazards associated with uncontrolled waste sites, the Hazardous Response Support Division, Environmental Response Branch, develops and presents training courses in safety and technical operations related to hazardous material responses.

The courses presented by the Environmental Response Branch last from 3 to 5 days. Although each course is tailored to cover technical material, relevant to the course title, no course will provide participants with exhaustive treatment of any subject. All courses emphasize the practical application of lecture information through problem-solving, case studies, demonstrations, and outdoor exercises. These courses are periodically held in various Region 10 locations as well as other locations throughout the United States.

#### SOME OF THE COURSES OFFERED ARE:

- ° Hazardous Material Incident Response Operations
- ° Personnel Protection and Safety
- ° Sampling for Hazardous Materials
- ° Air Surveillance for Hazardous Materials
- ° Incident Mitigation and Treatment Methods
- ° Hazard Evaluation and Environmental Assessment
- ° Response Safety Decision Making

### 10.3 OCCUPATIONAL MEDICAL MONITORING PROGRAM

The Region 10 Occupational Medical Monitoring Program is designed to serve as a "watch" over the health of those employees whose work regularly poses the possibility of exposure to toxic material or other hazardous working conditions. It is not a direct substitute for "general check-up" or other periodic examinations designed to monitor or promote general health. The occupational medical monitoring program is designed to screen for evidence of adverse effects of occupational exposure, particularly exposure to toxic substances.

#### OBJECTIVES OF THE PROGRAM:

- ° To detect adverse effects of occupational exposure.
- ° Initiate prompt corrective action when needed.
- ° Insure fitness for duty

#### FOUR TYPES OF EXAMINATIONS ARE PROVIDED:

- ° Baseline - (Critical for new employees)
- ° Periodic - (Usually annual exams)
- ° Acute exposure monitoring
- ° End of employment or termination exams.

## 10.4 PROTECTIVE CLOTHING AND EQUIPMENT

### 10.4.1 Basic Personal Protective Clothing and Equipment Items for Field Inspectors.

- ° Steel toed leather safety shoes or boots
- ° Hardhat (faceshield is optional)
- ° Safety glasses or chemical splash goggles
- ° Cotton/polyester coveralls

The following clothing and equipment items may be required for certain types of inspections based on the activities or toxic material on site:

- ° Steel toed chemical resistant rubber boots
- ° Chemical resistant gloves (Inner and Outer)
- ° Disposable boot covers
- ° Acid splash suit
- ° Disposable chemical resistant coveralls with attached hood
- ° Noise reducing ear plugs or muffs
- ° Respiratory Protective Equipment
- ° Duffle Bag

EPA inspectors must wear equivalent or higher levels of protection than the on-site or company employees when performing inspections. Under no circumstances should an EPA field inspector enter areas wearing respirators or other protective clothing that does not meet the same protection level worn by in-plant or on-site workers. This does not mean that an EPA inspector can borrow or wear a respirator or protective clothing provided by the company or facility being inspected. It is Region 10 policy that our field inspectors go out prepared with the proper equipment and clothing to perform the inspection safely using EPA provided equipment.

#### 10.4.2 STOCK SOURCES AND PROCUREMENT REQUIREMENTS

During the budget process, it was agreed by all concerned that the Environmental Services Division would supply all field inspectors with disposable clothing and equipment items. Non-disposable clothing and equipment items must be purchased by the respective branch, division or operation office employing the field inspector. This does not mean that unusually large quantity requirements of disposable items will automatically be furnished by ESD. Orders for large quantities or unusual items, even though disposable, must be ordered by the respective branch, division or operation office.

The field employee and his or her supervisor are responsible for insuring the employee has the proper safety and health clothing and equipment to perform their work safely. The supervisor/Branch Chief is responsible for purchasing the safety clothing and equipment needed by the employee. The Regional Safety Officer can provide assistance in the type of clothing or equipment to purchase and the various suppliers available for purchasing this material.

The ESD contact for disposable clothing and equipment is Andy Hess. His telephone number is 442-0370.

##### DISPOSABLE CLOTHING INCLUDES:

- ° Cartridges and canisters for respirators
- ° Inner and outer chemical resistant gloves
- ° Disposable booties
- ° Disposable coveralls
- ° Ear plugs
- ° Cleaner/Sanitizer for respirators
- ° Duct tape
- ° Trash bags
- ° Hard hats (non-disposable but furnished by ESD)

# OCCUPATIONAL HEALTH AND SAFETY REGULATIONS

## 10.5 OVERVIEW

We are governed by OSHA and EPA Safety and Health Regulations. Since we are a federal agency, we must meet the OSHA Standards. You must be aware and conscious of the fact that contractors and state employees must abide by the state OSHA Regulations (where applicable) which may be more stringent than the federal OSHA Standards. EPA Region 10 staff should abide by the state regulations if they are more stringent than the federal OSHA Standards.

### SOME OF THE REGULATIONS AND GUIDELINES ARE:

- ° 29 CFR 1910 - OSHA Standards
- ° State OSHA Regulations (where applicable)
- ° EPA Occupational Health and Safety Manual
- ° EPA Region 10 Policies and Guidelines
- ° In-plant or Company Policies
- ° State-of-the-Art Factor

Copies of these regulations and guidelines are available through the Regional Safety Officer (Ron Blair) at 442-0370.



## 10.6 SITE SAFETY AND HEALTH PLANS

The purpose of a site safety and health plan is to establish procedures and requirements for protecting EPA employees investigating or inspecting facilities, sites or other areas where sampling and monitoring activities are conducted. The content of a safety and health plan is dependent on the degree of risk associated with the inspection or survey activity. The greater the hazards or risk, the more information and procedural requirements needed for the plan.

A site safety and health plan may be as simple and short as adding a short narrative or discussion to the sampling plan. For example, simple investigations which require the collection of a few environmental samples may only require several paragraphs in the sampling plan. On the other hand, an investigation of an abandoned hazardous waste site suspected of containing highly toxic materials in drums and tanks will require a detailed site safety and health plan.

In emergency response situations, the sample site safety plan included in the EPA Standard Operating Safety Guides, Annex 10 can be used. It should be completed on the way to the incident by the Team Leader. If all EPA field employees involved in the response have had the required training covering personal protection and safety, levels of protection, and other EPA protocol, then this sample safety plan format may be used. It should be read and signed by all employees involved in the investigation, as should all site safety and health plans for each activity.

### SOME OF THE GENERAL REQUIREMENTS FOR A HAZARDOUS WASTE TYPE OF SURVEY OR INSPECTION SITE SAFETY PLAN ARE:

- ° Background of the site
- ° Hazard evaluation
- ° List of EPA personnel and their responsibilities
- ° Levels of protection for each activity
- ° Delineate work areas
- ° Establish procedures to control site access
- ° Decontamination procedures
- ° Site emergency procedures
- ° Emergency medical care

## 10.6 CONTINUED

- ° Air monitoring and environmental surveillance
- ° Specific training required
- ° Establish procedures for weather related problems

## WE NOW HAVE THREE GENERIC SITE SAFETY AND HEALTH PLANS FOR:

- ° Asbestos inspections at demolition/renovation sites
- ° PCB inspections
- ° Placer mine inspections

## 10.7 HAZARDOUS DUTY PAY

EPA has developed and issued procedures covering hazardous duty pay. You must be an EPA employee in order to request and receive hazardous duty pay.

### THE FOLLOWING ARE SOME OF THE GENERAL GUIDELINES FOR PAYMENT OF HAZARDOUS DUTY PAY:

- ° If levels A,B or C categories of protection are required during an emergency response, waste removal, or other situation involving hazardous conditions, then hazard pay should be authorized in advance, provided that all other regulatory requirements are met.
- ° Helicopter flights requiring the execution of unusual patterns to avoid obstructions, enter sheltered valleys, and deep narrow canyons, avoid turbulent winds, or land on isolated lakes amidst mountainous or wooded terrain warrant hazardous duty pay.
- ° Low-level (i.e. under 500') helicopter flight operations over wooded or open water areas involving flight at low altitudes or landing at unprepared sites in wooded or mountainous terrain warrant hazardous duty pay.

## 10.8 SPECIAL OR UNIQUE SAMPLING REQUIREMENTS

One of the most important things an EPA sampler or field employee should consistently remember and follow is recognize your limitations. This is especially true when only one employee is involved in the survey or inspection activity. The importance of collecting a sample during a specific environmental incidence or episode is just simply not worth it if collecting the sample will involve risk to life or health.

- ° Occasionally, EPA inspectors may need to request additional assistance in collecting samples under unique and hazardous situations. There are three groups that can be called on for additional assistance, depending on the program area, time required, and other factors associated with the specific site. They are:
  - ° The Regional Field Hazardous Waste Investigation Team. The contact for this source of assistance is the Chief, Field Operations and Technical Support Branch, ESD.
  - ° The Regional Superfund Removal and Emergency Section and their contracted Technical Assistance Team (TAT Team). The contact for this assistance is the Chief, Superfund Removal and Emergency Section.
  - ° The Region 10 Field Investigation Team (FIT-Remedial Investigations). The contact for this source of assistance is the Chief, Field Operations and Technical Support Branch.

## 10.9 ON-THE-JOB INJURIES AND ACCIDENT REPORTING

### 10.9.1 BASIC REQUIREMENTS

The EPA Occupational Health and Safety Manual, Chapter 3, Accident and Illness Investigation, Reporting, and Recordkeeping Requirements outlines the requirements for reporting on-the-job accidents or illnesses. A copy of this manual has been distributed and should be maintained by each division and operations office.

### PROCEDURES FOR THE REPORTING OF INFORMATION ON ACCIDENTS OR ILLNESS INCIDENTS BY THE EMPLOYEE AND SUPERVISOR ARE AS FOLLOWS:

- ° THE EMPLOYEE MUST:

1. Report any job-connected incidents to his or her supervisor immediately.
2. Furnish accurate and detailed information regarding the incident on EPA Form 1440-9.
3. Complete a CA-1 form, if an occupational injury is involved.
4. Complete a CA-2 form if an occupational illness is involved.
5. Complete an SF-91 form if a vehicular accident is involved.
6. Provide the attending physician or hospital with a CA-16 form signed by the supervisor.

- ° THE SUPERVISOR MUST:

1. Sign and complete Part A of form CA-16, Request for Examination and/or Treatment. This form basically commits the federal government to paying for the medical services, and the supervisor should ensure that the injury or illness occurred on the job before signing this form.
2. Investigate all job-connected incidents within two working days of the incident and complete EPA Form 1440-9.
3. Complete Optional Form 26, Data Bearing Upon Scope of Work where vehicular collision is involved.

### 19.9.2 EMERGENCY CONSIDERATIONS

In an emergency situation, get treatment as soon as possible for the injured employee and do not worry about the forms. They can be completed and filled out later.

Emergency planning and services available are a very important element of a good site safety plan. Everyone on the sampling team should know where the nearest telephone is located and whether or not they are in an emergency 911 telephone area. If not, the telephone numbers for the emergency services should be listed in the site safety plan. It may be necessary on some investigations to carry cellular telephones or radios for emergency communication purposes. Emergency situations in remote locations are very critical aspects of sampling or field activities in these types of areas. All team members or EPA employees should know what to do in these situations and discuss what they are going to do if a medical emergency occurs in a remote location. This type of sampling will usually require at least two and probably three employees to be involved in this type of investigation.

## 11.0 Data Access / The Laboratory Management System

- 11.1 Introduction
- 11.2 Program TRNPRY
- 11.3 Program PRJDMP
- 11.4 Program LABTAB1
- 11.5 Program LABTAB3
- 11.6 Program LABTAB4

## 11.0 Data Access / The Laboratory Management System

### 11.1 Introduction -----

The Laboratory Management System is the database on the PDP 11/70 for the storage of sample analysis results from the EPA, Manchester Lab. Recently, we have started entering contract laboratory data into the database. The data is entered by the laboratory and retrieved for the Project Officers by the Regional Sample Control Center.

Within the LMS, there are five general programs that generates sample analysis reports.

1. TRNPRT (Pronounced 'tran \* print')
2. PRJDMP (pronounced 'project \* dump')
3. LABTAB1 (pronounced 'lab \* tab \* one')
4. LABTAB3 (pronounced 'lab \* tab \* three')
5. LABTAB4 (pronounced 'lab \* tab \* four')

A detailed explanation and example of each report type can be found on the attached pages.

Normally, the Project officer will receive output from the PRJDMP program when all analyses have been completed. Partial data retrievals can be requested and will automatically be provided should only one fraction delay the completion of all requested analyses. Contact the Regional Sample Control Center for data retrievals.

Any data stored in the Lab Management System can also be transferred to the IBM PCs where graphs and charts can be generated. Upon request the RSCC will transfer data and aid in the manipulation of the data.



11.2 Program Name: TRNPRT (pronounced 'tran \* print')

Description: Generates a report containing all data entry transactions containing the sample analysis results of a given sample with multiple parameters (TRNIN1) or a given parameter analysis of multiple samples (TRNIN2).

Example of Report: Attachment A - TRNIN1  
Attachment B - TRNIN2  
Attachment C - Long Version

Enty  
Vst> Transaction #: 03051141

Work Group: (71) Pest/PCB - PP Scan

Instrument: (GCT-EC ) Tracor GC 222 No.1, Ni-63 EC Detector

Method: (EP2-608 ) GC Ext Scan

Chemist: (RHR) Rieck, Bob ESD Hours Worked:

Project: AMB-034B OREGON RIVERS

Prs Ele#: A53B2F

Prj Off: Cleland, Bruce ESD Analysis Due: Revised Due:

\*\*\* Sample Records in Transaction \*\*\*

Parameter Form File: PEST

Title: Pesticide Analysis

Seq#	Sample #	Date/Time	Description
01	84500851	840731	TILLAMOOK OYSTERS

Record Type: TRNIN1 Date Verified: 85/04/23 By: Beckner, Laura M. ESD  
Transaction Status: Verified Transaction...Ready to release.  
\*\*\* Verified and Transferred to VERTRANS \*\*\*  
Processed: 16-SEP-85 07:25:37 Status: V Batch: A (In VFR DR)

Transaction #: 03051141

(71) Pest/PCB - PP Scan

Proj Code : AMB-034B OREGON RIVERS

PE # : A53B2

Sample Id: 84500851  
Matrix: Tissue  
Units: ug/kg  
% Slds:  
QA Code:  
Date Extract: 850110  
Date Analyzed: 850116  
1 Aldrin 1U  
2 Chlordane 1U  
3 Dieldrin 1U  
4 DDT, 4,4'- 10  
5 DDE, 4,4'- 8  
6 DDD, 4,4'- 1U  
7 Endosulfan, alpha- 1U  
8 Endosulfan, beta- 1U  
9 Endosulfan sulfate 1U  
10 Endrin 1U  
11 Endrin aldehyde 1U  
12 Heptachlor 1U  
13 Heptachlor epoxide 1U  
14 BHC, alpha- 1U  
15 BHC, beta- 1U  
16 BHC, gamma- 1U  
17 BHC, delta- 1U  
18 Toxaphene 30U  
19 PCB - 1016 10U  
20 PCB - 1221 10U  
21 PCB - 1232 10U  
22 PCB - 1242 10U  
23 PCB - 1248 10U  
24 PCB - 1254 10U  
25 PCB - 1260 10U  
26 Methoxychlor  
27 DDE (I.S.) IntStd ZRC

SEP-85

EPA Region X Lab Management System

Page 1

\*\*\* Lab Analysis Report \*\*\*

Transaction #: 03220915 Seq #: 01 (31) Metals - PP

TO: OREGON RIVERS

(AMB-034B)

A53B2F

BRC

Var: MERCURY TISMG/KG WET WGT

(Par# 71930 S)

Instrument: ACF403 AA Cold Flame (PE403)

Method: EP1-245.1 Mercury, Cold Vapor, Manual

Chemist: (RYA) Araki, Roy A. ESD Hours Worked:

Lab Prep: ( ) Unspecified

Date Preprd:

Date Analyzd: 850118

Matrix: (70) Tissue

Units: (23) ug/sm

Line	Sample #	Result	Sample Location/Description	#Days to Anal
1	84 500851	.012	TILLAMOOK OYSTERS	841120 ( 59)
2	84 500853	.011	TILLAMOOK OYSTERS	841120 ( 59)
3	84 500855	.012	COOS BAY OYSTERS	841120 ( 59)
4	84 500857	.019	COOS BAY OYSTERS	841120 ( 59)
5	84 500858	.613	MALHEUR LAKE CATFISH	841120 ( 59)
6	84 500860	.329	SANTIAM SUCKER - TISSUE	841120 ( 59)
7	84 500862	.528	COLUMBIA SLOUGH SUCKER-TISSUE	841120 ( 59)
8	84 500864	.550	YAMHILL SUCKER-TISSUE	841120 ( 59)
9	84 500866	.066	ROGUE SUCKER - TISSUE	841120 ( 59)
10	84 500868	.515	SP&S RAILROAD BR.-SUCKER TISSUE	841120 ( 59)
11	84 500870	.134	WHEATLAND FERRY SUCKER TISSUE	841120 ( 59)
12	84 500872	.417	TUALATIN SUCKER TISSUE	841120 ( 59)
13	84 500874	.212	DESCHUTES SUCKER TISSUE	841120 ( 59)
14	84 500876	.575	UMPUQUA SQUAWFISH TISSUE	841120 ( 59)
15	84 500878	.515	UMPUQUA SUCKER TISSUE	841120 ( 59)
16	84 500880	.057	KLAMATH RIVER SUCKER TISSUE	841120 ( 59)
17	84 500882	.105	STAUFFEER SUCKER TISSUE	841120 ( 59)
18	84 500884	.112	MAKENZIE SUCKER TISSUE	841120 ( 59)
19	84 500886	.768	OWYHEE RESERVIOR C.S. SUCKER-TISSUE	841120 ( 59)
20	84 500888	.027	OWYHEE RESERVOIR -B.LIP TISSUE	841120 ( 59)
21	84 500890	.051	MALHEUR BRIDGELIP SUCKER TISSUE RM 10	841120 ( 59)
22	84 500892	.212	MALHEUR COARSESCALE SUCKER TISSUE RM 1	841120 ( 59)
23	84 500894	.474	MALHEUR COARSESCALE SUCKER TISSUE RM 6	841120 ( 59)
24	84 500896	.840	OWYHEE RIVER RM2 COARSESCALE SUCKER TI	841120 ( 59)
25	84 500898	.729	OWYHEE RVR RM 19 COARSESCALE SUCKER TI	841120 ( 59)

Record Type: TRNIN2

Date Verified: 85/03/22

By: Roberson, Ray

ES0

Transaction Status: Verified Transaction...Ready to release.

\*\*\* Verified and Transferred to VERTRANS \*\*\*

Processed: 16-SEP-85 07:25:37 Status: V Batch: A (In VER DB)

Transaction #: 04220830 Seq #: 04 (74) PCB Scan  
 Proj Code : HWD-053A QUEEN CITY FARMS PE # : GB10P

Sample No.: 86 144603 Alternate Keys:  
 Station # : Description: NORTH WASTE FILE, NW CORNER  
 Source: Sludge (General) Tox/Haz: Y Enforcement: Y Confidential: i  
 Begin Date: 860403 1150 End Date: Received Date: 860404 0935  
 Comments:

Instrument: GCT-570 Method: EP2-608 Chemist: Rieck, Bob ES  
 Sample Matrix: (40) Sediment Units: (22) ug/ks %Sids: 89.2  
 QA Code: ( ) Unspecified Lab Pre: ( ) Unspecified  
 Date Extracted: 860409 Date Analyzed: 860418 # Days to Ext/Anal: 6/

Line	Par #	Parameter Description	Units	Value
1	12674112	PCB - 1016	ug/ks	450U
2	11104282	PCB - 1221	ug/ks	450U
3	11141165	PCB - 1232	ug/ks	450U
4	53469219	PCB - 1242	ug/ks	450U
5	12672296	PCB - 1248	ug/ks	450U
6	11097691	PCB - 1254	ug/ks	450U
7	11096825	PCB - 1260	ug/ks	7300
8	0	DDE (I.S.)	Pct Recv	NAI

11.3 Program Name: PRJDMP (pronounced 'project \* dump')

Description: PRJDMP Generates a report that provides a one-  
page statement of sample analysis results for  
each sample number requested.

Example of Report: Attachment A

Project: TEC-2226

MARINE PUMPS AND EQUIPMENT

Officer: SKK

Account: A5302F

Sample No: 85 250850

Begin Sample Date: 05/06/14 08:30

Source: Sediment (General)

Depth:

QA Code:

Laboratory: RX

Description: MA BARNES (UNUSEU SAND&LAST SAND)

Metals-Specified		Sediment	
Parameter		Result	Units
Arsenic	Sedmg/kg	3.466	Dry Wgt
Ba Mud	Dry wgt	17	ug/kg-Ba
Cd Mud	Dry wgt	4.72	ug/kg-Cd
Chromium	Sedmg/kg	104.8	Dry Wgt
Copper	Sedmg/kg	4.470	Dry Wgt
Lead	Sedmg/kg	NEQ	Dry Wgt
Silver	Sedmg/kg	4.23	Dry Wgt
Zinc	Sedmg/kg	14.956	Dry Wgt
Selenium	Sedmg/kg	1.5	Dry Wgt
MERCURY	SEU-PULP	0.003	ug/kg wt

Metals - EP Toxicity		EPT-Stu	
Parameter		Result	Units
Arsenic	As,Tot	1	ug/l
Barium	Ba,Tot	170	ug/l
Cadmium	Cd,Tot	24.8	ug/l
Chromium	Cr,Tot	10	ug/l
Copper	Cu,Tot	9326	ug/l
Lead	Pb,Tot	56	ug/l
Silver	Ag,Tot	0.1	ug/l
Zinc	Zn,Tot	2,075	ug/l
Selenium	Se,Tot	4	ug/l
Mercury	Hg,Tot	0.030	ug/l

Organics - General		Sediment	
Parameter		Result	Units
OIL-GRSE	MUD FRGR	NEQ	ug/kg
Lead	Sedmg/kg	2,420	Dry Wgt

VOA - PP Scan (GCMS)		Sediment	
Parameter		Result	Units
Methane, Tetrachloro-		NEQ	
Methane, Trichloro-		NEQ	
Benzene		NEQ	
Ethane, 1,1,1-Trichloro		NEQ	
Methane, Bromo-		NEQ	
Methane, Chloro-		NEQ	
Ethane, Chloro-		NEQ	
Ethylene, Chloro-		NEQ	

VOA - PP Scan (GCMS)		Sediment	
Parameter		Result	Units
Methane, Dichloro-		NEQ	
Methane, Tribromo-		NEQ	
Methane, Dichlorobromo-		NEQ	
Ethane, 1,1-Dichloro-		NEQ	
Ethylene, 1,1-Dichloro-		NEQ	
Methane, Trichlorofluor		NEQ	
Methane, Dichlorodifluor		NEQ	
Propane, 1,2-Dichloro-		NEQ	
Ethane, 1,1,2-Trichloro		NEQ	
Ethylene, 1,1,2-Trichloro		NEQ	
Ethane, 1,1,2,2-Tetrachloro		NEQ	
Benzene, Ethyl-		NEQ	
Acrolein		NEQ	
Ethane, 1,2-Dichloro-		NEQ	
Acrylonitrile		NEQ	
Toluene		NEQ	
Benzene, Chloro-		NEQ	
Ether, Chloroethyl Viny		NEQ	
Methane, Chlorocyclohexene		NEQ	
Ethylene, Tetrachloro-		NEQ	
Ethylene, 1,2-Trans-Dic		NEQ	
Propylene, 1,2-Dichloro		NEQ	

B/H/Acid Scan		Sediment	
Parameter		Result	Units
2-Methylnaphthalene		100	ug/kg-dr
Unknown		300	ug/kg-dr
Pyrene, benzo(a)-		100	ug/kg-dr
Phenol, 2,4-Dinitro-		100	ug/kg-dr
Anthracene, benzo(a,h)		100	ug/kg-dr
Anthracene, benzo(a)-		100	ug/kg-dr
m-Cresol, p-Chloro-		100	ug/kg-dr
Aniline		NEQ	
Nitrosamine, Dimethyl-		NEQ	
benzoic Acid		100	ug/kg-dr
Ethane, hexachloro-		100	ug/kg-dr
Cyclopentadiene, Hexach		100	ug/kg-dr
Isophorone		100	ug/kg-dr
Acenaphthene		100	ug/kg-dr
Phthalate, Diethyl-		100	ug/kg-dr
Phthalate, Di-n-butyl-		100	ug/kg-dr
Phenanthrene		100	ug/kg-dr

B/H/Acid Scan		Sediment	
Parameter		Result	Units
Phthalate, n-Butyl Benz		100	ug/kg-dr
Nitrosamine, Diphenyl-		100	ug/kg-dr
Fluorene		100	ug/kg-dr
Butadiene, Hexachloro-		100	ug/kg-dr
Phenol, Pentachloro-		100	ug/kg-dr
Phenol, 2,4,6-Trichloro		100	ug/kg-dr
Phenol, 2-Nitro-		100	ug/kg-dr
Naphthalene		100	ug/kg-dr
Naphthalene, 2-Chloro-		100	ug/kg-dr
benzidine, 3,3'-Dichlor		100	ug/kg-dr
benzidine		NEQ	
o-Cresol		100	ug/kg-dr
benzene, 1,2-Dichloro-		100	ug/kg-dr
Phenol, 2-Chloro-		100	ug/kg-dr
Phenol, 2,4,5-Trichloro		100	ug/kg-dr
benzene, Nitro-		100	ug/kg-dr
Phenol, 4-Nitro-		100	ug/kg-dr
benzyl Alcohol		100	ug/kg-dr
Ether, 4-Bromophenyl Ph		100	ug/kg-dr
Phenol, 2,4-Dimethyl-		100	ug/kg-dr
p-Cresol		100	ug/kg-dr
benzene, 1,4-Dichloro-		100	ug/kg-dr
Aniline, p-Chloro-		100	ug/kg-dr
Phenol		100	ug/kg-dr
Ether, bis(2-Chloroethy		100	ug/kg-dr
Methane, bis(2-Chloroeth		100	ug/kg-dr
Phthalate, bis(2-Ethylh		100	ug/kg-dr
Phthalate, Di-n-Octyl		100	ug/kg-dr
benzene, Hexachloro-		100	ug/kg-dr
Anthracene		100	ug/kg-dr
benzene, 1,2,4-Trichlor		100	ug/kg-dr
Phenol, 2,4-Dichloro-		100	ug/kg-dr
Toluene, 2,4-Dinitro-		100	ug/kg-dr
Pyrene		100	ug/kg-dr
Phthalate, Dimethyl		100	ug/kg-dr
Ubenzofuran		100	ug/kg-dr
Pyrene, Benzo(g,h,i)-		100	ug/kg-dr
Pyrene, Indeno(1,2,3-c,		100	ug/kg-dr
Fluoranthene, 3,4-Benzo		NEQ	
Fluoranthene		100	ug/kg-dr
Fluoranthene, Benzo(k)-		100	ug/kg-dr
Acenaphthylene		100	ug/kg-dr
Chrysene		100	ug/kg-dr
o-Cresol, 4,6-Dinitro-		100	ug/kg-dr

(Continued on next page)

## ATTACHMENT - A 11.3

SEP-85  
123:49EPA Region X Lab Management System  
\*\*\* Sample/Project Analysis Results \*\*\*

Page

Project: AMB-0348

OREGON RIVERS

Officer: BRC

Account: A5

Sample No: 84 500851

Begin Sample Date: 94/07/31 :

Source: Tissue (General)

Depth:

QA Code:

End Sample Date: 94/11/20 :

Comp:

Freq:

Metals-Specified		Tissue	
Parameter		Result	Units
ARSENIC	TISMG/KG	.34	WET WGT
MERCURY	TISMG/KG	.012	WET WGT
LEAD	TISMG/KG	.020	WET WGT
COPPER	TISMG/KG	35.00	WET WGT
CR-FISH	UG/G DR	.38	MG/KG WT
CADMIUM	TISMG/KG	.69	WET WGT

Metals - PP		Tissue	
Parameter		Result	Units
MERCURY	TISMG/KG	.012	WET WGT

Pest/PCB - PP Scan		Tissue	
Parameter		Result	Units
DDT, 4,4'-		10	ug/kg
Chlordane		10	ug/kg
BHC, Gamma-		10	ug/kg
Dieldrin		10	ug/kg
Endrin		10	ug/kg
DDD, 4,4'-		10	ug/kg
DOE, 4,4'-		8	ug/kg
Heptachlor		10	ug/kg
Aldrin		10	ug/kg
BHC, Alpha-		10	ug/kg
BHC, Beta-		10	ug/kg
BHC, Delta-		10	ug/kg
Endosulfan, Alpha-		10	ug/kg
Heptachlor Epoxide		10	ug/kg
Endosulfan Sulfate		10	ug/kg
Endrin Aldehyde		10	ug/kg
Toxaphene		300	ug/kg
PCB-1260 (Arochlor 1260		100	ug/kg
PCB-1254 (Arochlor 1254		100	ug/kg
PCB-1221 (Arochlor 1221		100	ug/kg
PCB-1232 (Arochlor 1232		100	ug/kg
PCB-1248 (Arochlor 1248		100	ug/kg
PCB-1016 (Arochlor 1016		100	ug/kg
Endosulfan, Beta-		10	ug/kg
PCB-1242 (Arochlor 1242		100	ug/kg

(Sample Complete)



11.4 Program Name: LABTAB1 (pronounced 'lab \* tab \* one')

Description: LABTAB1 generates a table report for up to eight lab numbers across the top of a page and up to fifty STOKET parameter numbers down the side of the page.

Example of Report: Attachment A

ATT.

Management System: Station Table Program (LABTAB1)

Run Date: 16-SEP-85

EXAMPLE OF REPORT GENERATED BY THE PROGRAM 'LABTAB1'

Lab #	# 84 500851	# 84 500853	# 84 500855	# 84 500857	# 84 500858	# 84 500860	# 84 500861
Station	TILLAMOOK OY	TILLAMOOK OY	COOS BAY OYS	COOS BAY OYS	MALHEUR LAKE	SANTIAM SUCK	SANTIAM SUCK
Date	84/07/31	84/07/31	84/09/26	84/09/26	84/09/21	84/09/17	84/09/17
Time							
GENIC TISMG/KG WET WGT	.34	.28	.82	.84	.04 U	.04 U	.09
MIUM TISMG/KG WET WGT	.64	.52	.70	.92	.01	.01 U	.039
FISH UG/G OR MG/KG WGT	.38	.02 U	.12	.64	.02 U	.12	--
PER TISMG/KG WET WGT	35.00	27.00	48.00	64.00	.80	1.10	1.9
ID TISMG/KG WET WGT	.02 U	.02 U	.02 U	.02 U	.02 U	.02 U	.03 U
ICURY TISMG/KG WET WGT	.012	.011	.012	.019	.013	.029	.05

End of Processing \*\*\*

11.5 Program Name: LABTAB3 (pronounced 'lab \* tab \* three')

Description: LABTAB3 creates a table report for up to eight lab sample numbers across the top of a page; up to fifty CAS parameter numbers down the side.

Example of Report: Attachment A

## ATTACHMENT A - 11.5

Management System: Station Table Program (LABTAB 3)

Run Date: 16-SEP-85 Time: 07:13

EXAMPLE OF REPORT GENERATED BY THE PROGRAM 'LABTAB3'  
PESTICIDES AND PCBs

Lao #:	# 84 500851	# 84 500853	# 84 500855	# 84 500857	# 84 500858	# 84 500860	# 84 500861
Station:	TILLAMOOK OY	TILLAMOOK OY	COOS BAY OYS	COOS BAY OYS	MALHEUR LAKE	SANTIAM SUCK	SANTIAM SUCK
Date:	84/07/31	84/07/31	84/09/26	84/09/26	84/09/21	84/09/17	84/09/17
Time:							
Matrix:							
Analysis units:	Tissue ug/kg	Tissue ug/kg	Tissue ug/kg	Tissue ug/kg	Tissue ug/kg	Tissue ug/kg	Tissue ug/kg
Drin	1 U	1 U	1 U	1 U	1 U	1 U	5 U
Endosulfan	1 U	1 U	1 U	1 U	1 U	1 U	5 U
Endrin	1 U	1 U	1 U	1 U	1 U	1 U	5 U
DT, 4,4'-	10	10	10	11	1 U	312	146
DE, 4,4'-	8	8	3	8	5	310	720
DD, 4,4'-	1 U	1 U	7	1 U	1 U	43	275
Endosulfan, Alpha-	1 U	1 U	1 U	1 U	1 U	1 U	5 U
Endosulfan, Beta-	1 U	1 U	1 U	1 U	1 U	1 U	5 U
Endosulfan Sulfate	1 U	1 U	1 U	1 U	1 U	1 U	5 U
Endrin	1 U	1 U	1 U	1 U	1 U	1 U	5 U
Endrin Aldenhyde	1 U	1 U	1 U	1 U	1 U	1 U	5 U
Heptachlor	1 U	1 U	1 U	1 U	1 U	1 U	5 U
Heptachlor Epoxide	1 U	1 U	1 U	1 U	1 U	1 U	5 U
BHC, Alpha-	1 U	1 U	1 U	1 U	1 U	1 U	5 U
BHC, Beta-	1 U	1 U	1 U	1 U	1 U	1 U	5 U
BHC, Gamma-	1 U	1 U	1 U	1 U	1 U	1 U	5 U
BHC, Delta-	1 U	1 U	1 U	1 U	1 U	1 U	5 U
Toxaphene	30 U	30 U	30 U	30 U	30 U	30 U	150 U
PCB-1016 (Arochlor 1016)	10 U	10 U	1 U	10 U	10 U	10 U	50 U
PCB-1221 (Arochlor 1221)	10 U	10 U	1 U	10 U	10 U	10 U	50 U
PCB-1232 (Arochlor 1232)	10 U	10 U	1 U	10 U	10 U	10 U	50 U
PCB-1242 (Arochlor 1242)	10 U	10 U	1 U	10 U	10 U	10 U	50 U
PCB-1248 (Arochlor 1243)	10 U	10 U	1 U	10 U	10 U	10 U	50 U
PCB-1254 (Arochlor 1254)	10 U	10 U	1 U	10 U	10 U	10 U	50 U
PCB-1260 (Arochlor 1260)	10 U	10 U	1 U	10 U	10 U	10 U	50 U
Methoxychlor	--	--	--	--	--	--	--

\* Indicates known or suspected carcinogen

(End of Processing)

# ATTACHMENT A - 11.6

Lab Management System Parameter Table Program (Labtab4)

Run Date: 16-SEP-85

EXAMPLE OF REPORT GENERATED BY THE PROGRAM 'LabTab4'

Station	Date	Time	Lab#	ARSENIC	CADMIUM	CH-FISH	COPPER	LEAD	MER
				TISMG/KG WET WGT 1004	TISMG/KG WET WGT 71940	UG/G DR MG/KG WT 71939	TISMG/KG WET WGT 71937	TISMG/KG WET WGT 71936	TISMG/KG WET WGT 71936
TILLAMOOK OYSTERS	84/07/31		500851	.34	.09	.38	35.00	.02U	
TILLAMOOK OYSTERS	84/07/31		500853	.28	.52	.02U	27.00	.02U	
COOS BAY OYSTERS	84/09/26		500855	.82	.70	.12	48.00	.02U	
COOS BAY OYSTERS	84/09/26		500857	.84	.92	.64	64.00	.02U	
MALHEUR LAKE CATFISH	84/09/21		500858	.04U	.01	.02U	.80	.02U	
SANTIAM SUCKER - TISSUE	84/09/17		500860	.04U	.01U	.12	1.10	.02U	
SANTIAM SUCKER-LIVER	84/09/17		500861	.09	.039	--	1.9	.03U	

\*\*\* End of Processing \*\*\*

11.6 Program Name: LABTAB4 (pronounced 'lab \* tab \* four')

Description: LABTAB4 generates a table report for up to six STOKET parameter numbers across the top of a page and up to fifty lab sample numbers (either single numbers or a range of samples) down the side.

Example of Report: Attachment A

# LIST OF RESULT QUALIFIERS FOR NON NUMERIC RESULTS

A result qualifier indicates the reason the analysis did not produce a numerical result.

<u>Qualifier</u>	<u>Full name</u>	<u>Definition</u>
FPS	Failed Preliminary Screening	A preliminary screening of the sample for the subject parameter was conducted.
NSQ	Not Sufficient Quantity	There was not a sufficient quantity of the sample to conduct an analysis to determine the concentration of the subject parameter.
LAC	Laboratory Accident	There was an accident in the laboratory that either destroyed the sample or rendered it not suitable for analysis.
FAC	Field Accident	There was an accident in the field that either destroyed the sample or rendered it not suitable for analysis.
ISP	Improper Sample Preservation	Due to improper preservation of the sample it was rendered not suitable for analysis.
NAI	Not Analyzed Due to Interference	Because of uncontrolled interference the analysis for the subject parameter was not conducted.
NAR	No Analysis Result	There is no analysis result. Reason is unspecified.
CAN	Cancelled	The analysis of this parameter was cancelled and not performed.
FOC	Failed Quality Control	The analysis result is unusable because quality control limits were exceeded when the analysis was conducted.
BDL	Below Detectable Limits	There was not a sufficient concentration of the parameter in the sample to exceed the lower detection limit in force at the time the analysis was performed.
E	Exponent	Used to report results with large values. The value is equal to the number before E times 10 to the power of the number after E.

## List of Remark Codes

A remark code is used to qualify a data value.

<u>Remark Code</u>	<u>Definition</u>
R	Analyte is found in the blank as well as the sample, indicates possible/probable blank contamination.
J	Estimated value; value not accurate.
M	Presence of material verified but not quantified.
U	Compound was analyzed for but not detected. The number is the minimum detection limit.
UJ	Compound was analyzed for but not detected. The number is the estimated minimum detection limit.

## 12.0 LEGAL CONSIDERATIONS

Three general issues to discuss: (1) Gaining entry to a site; (2) Legal issues relating to activities on-site; (3) Post inspection issues.

### 12.1 Gaining entry to a site

- Consent

- "Conditional" consent: conditions cannot be accepted if they improperly limit EPA's statutory rights to enter and inspect. Improper conditions include:

- (1) requirements not only to sign visitors' log (that's ok), but "hold harmless" or "indemnification" agreements
- (2) requirements of prior notice
- (3) "confidentiality" agreements
- (4) restrictions on use of photographs
- (5) allowing entry only to portions of the facilities, or consent to some but not all of the inspectors.

- Obtaining an inspection warrant in the event of denial or "conditional" consent (legally equivalent to denial): Bases for obtaining civil warrant are (1) reason to believe a violation is occurring or has occurred, or (2) selection of site pursuant to a "neutral administrative scheme"

- Warrant also naming state inspectors as EPA "Authorized representatives"



- Executing a warrant: need to make a return of warrant "giving inventory of samples and documents obtained

## 12.2 Legal Issues Relating to Activities Conducted On-Site

- Chain-of-custody procedures for all samples taken: labeling, proper storage, etc., keep the "links" strong and few

- Splitting samples with site operator

- Inspectors' notebooks: may be discoverable through a request for production of documents in litigation, subject to FOIA re Congressional subpoena: keep them objective, well-organized, and identify in the notebook any information given confidentiality by company or by informant

- Estoppel: operators may attempt to tie Government's hands by asserting that they relied upon something you said, and preventing Government from taking position (e.g. an enforcement) different from one allegedly taken by you. Be circumspect in your comments to site operator.

## 12.3 Post-Inspection Issues

- Responding to claims of confidentiality

- Press relations: may indicate facts of inspection, but not recommendations or views as to enforcement or other follow-up

- Appearing as a witness in deposition, hearing, or trial (see attached list of pointers for prospective witnesses)

- Expert witness training seminar: valuable training in the litigation process and in testifying as an expert witness

POINTS FOR PROSPECTIVE WITNESSES (Second Version)

1. ALWAYS TELL THE TRUTH. As a witness in a federal criminal case it is your absolute duty to tell the truth to the best of your ability. Do that and let the chips fall where they may - what effect the facts may have on the prosecution or the defense is solely the concern of the judge or jury, not of the witness.

2. DON'T VOLUNTEER INFORMATION YOU ARE NOT ASKED.

In your living room you can inject comments nobody has asked you to make. In Court you can't. Confine your answers to what you are asked, because information you volunteer may be inadmissible evidence or may be irrelevant to the case. If you are right that the information you might want to volunteer is important, one lawyer or the other will ask you.

3. DO NOT TELL WHAT OTHER PEOPLE SAID OR WHAT YOU THINK UNLESS YOU ARE SPECIFICALLY ASKED TO DO SO.

If you are asked what someone said or what you think about something, you can answer the question. But in most cases "hearsay" and opinions are improper in Court. Unless you are specifically asked to tell about a conversation or to give your opinion, assume that every question calls solely for what you actually saw, heard, or did. Above all, don't volunteer hearsay or opinions you are not asked to give.

4. IF YOU SEE A LAWYER STARTING TO STAND UP, WAIT FOR THE OBJECTION.

If you see a lawyer for the Government or for the defense starting to get up, he probably wants to object to a question you were asked. He has the right to have the judge rule on the objection before your answer. Don't jump the gun and answer first. If the Judge says "Objection overruled," then you may answer.

5. YOU CANNOT BE ASKED LEADING QUESTIONS ON DIRECT EXAMINATION.

As a Government witness, you cannot be asked "leading" questions by the Government on direct examination. A leading question is one which contains a suggested

answer. For example, "Were you able to see the defendant aim a gun at the car?" is leading. Or, "Isn't it a fact that . . ." is a leading question. Since the Government cannot lead you, you have to remember all of the facts pertinent to every question you are asked yourself, without help from the lawyer. Take your time and be sure to answer the question completely. If you are asked "Did anything else happen at that time?" or "Was anything else said" you can be sure you have omitted a fact which you mentioned to the U. S. Attorney or to a Government agent previously. Take your time and think back to what else may have happened which you failed to mention. Do not quickly answer "No" unless you are sure your answer is complete.

6. YOU CAN REFER TO DOCUMENTS IF YOU NEED TO. It is usually more effective if you can testify from memory without looking at anything. But if you need to look at something to refresh your recollection, you can. "May I see a copy of my statement to the FBI, I think that will refresh my recollection on that exact date," or a similar answer is entirely proper for you to say from the stand, on either direct examination by the Government or on cross-examination.

7. DON'T GUESS. If you don't know the answer to a question, just say so. It is wrong to guess if you don't actually know the answer. If you know most of the answer but not all of the details, you can say so. For example, if you are asked, "When did your last see the defendant" and you know the month or year but not the date, don't say "I can't recall", say that you can recall the approximate but not the exact time, and state it to the best of your recollection. But never guess if you have no first hand information.

8. DO NOT ASSUME THAT LONG-PAST EVENTS ARE ALWAYS DIM IN YOUR MEMORY.

Some witnesses will say in answer to a question "That was five years ago and so I can't remember" or "My recollection is poor for what happened that far back."

This is usually wrong and misleading. The importance of an event is usually more important than how long ago it was in determining how well you can remember it. Charts of memory have proven that most forgetting takes place within a very short time after the event. You may remember Pearl Harbor Day in 1941 and may not remember what you had for breakfast two days ago. If what you saw or heard struck you as important or unusual, you can probably remember it clearly even if it was a long time ago. If that is true and if you are asked, say so. If you don't remember something, just say "I don't remember". The chances are that you don't remember it because it didn't strike you as important at the time.

9. NEVER GET ANGRY. Some cross-examiners try to get witnesses angry so that they will make an error that the cross-examiner can dramatize. When you are angry, you are least likely to do your duty as a witness, which is to give truthful answers. If a lawyer tries to anger you, remember that he has a purpose. Your best reply is to remain absolutely calm and answer the questions. Remember that nothing a lawyer says is evidence of anything unless it is answered affirmatively by the witness. Remember that you are a witness and are not on trial in the case, no matter what you may be asked. If questions are too insulting, the Government may object, but it is much better if the witness can remain calm and handle every question without help from the Government. If you have made any mistakes in connection with the case, just admit them and the suspense will be gone from the subject. If you haven't, you should have no problem either.

10. BE SURE YOU UNDERSTAND THE QUESTION. If you don't absolutely understand a question, ask the examiner to explain what he means. This is especially important if the question is vague or contains value-judgment words, such as "Isn't it a fact that the defendant was always open and above-board in his dealings?" A question like

that can cause your answer to be misleading unless you have it clarified as to just what is meant.

11. BEWARE OF COMPOUND QUESTIONS. If you are asked several questions rolled into one, it will usually be impossible to answer accurately unless you break them down. In such a case, you may say, "That contains several aspects, which I'll try to answer one by one." Or, if the questions is too long, you can say, "Can you break that down for me and ask me the questions one at a time."

12. BEWARE OF LEADING QUESTIONS CONTAINING HALF-TRUTHS. Witnesses are frequently asked leading questions suggesting information that is either half true or contains facts not within the witness's knowledge. Such questions frequently sound plausible on their face, and there is a temptation to answer them "Yes" or "No" when that would not be accurate. If a question contains information that partly true and partly false, an explanation is necessary. The explanation should be in your own words. Don't allow a cross-examiner to put words in your mouth. Remember that the judge or jury will draw conclusions from your answers. The lawyer is not there to engage in polite conversations. He is trying to establish facts that he thinks will help his client. It is your duty to see to it that whatever is established by your testimony is "the truth, the whole truth, and nothing but the truth."

13. BEWARE OF YES OR NO. Some witnesses have the notion that all questions should be answered "Yes" or "No." That is frequently untrue. Many questions cannot be answered accurately with "Yes" or "No" because they contain half-truths or ambiguous phrases that can be misinterpreted later if answered "Yes" or "No." These are the questions that call for an explanation and in response to which you should state the facts of what happened in your own words. If the lawyer asks you to answer "Yes or No", you are entitled to tell him that it can't be answered "Yes or No" without the

answer being misleading. If he insists, you can say something like, "If it has to be answered 'Yes or No' I suppose the answer would be 'No..' It should be explained or it is misleading." The Court will not direct you to answer "Yes or No", unless the question permits that kind of answer.

14. "ISN'T IT A FACT" Be careful of questions start "Isn't it a fact that . . ." or "The fact is . . ., isn't it?" These are usually leading questions containing implications that may be only partly true and that require an explanation.

15. YOU MAY BE INTERRUPTED. When you explain an answer, you may often be interrupted by the cross-examiner, who will start the next question. Let him finish and then bring him back to your unfinished answer. "Before I answer that, I want to finish my answer to our last question." This is very important because the cross-examiner may try to stop you when you have answered the rest of the question that explains the first part of the answer. You have to say whether you were finished, because the Government counsel doesn't know if you were through or not.

16. BEWARE OF EXACT DISTANCES AND TIMES. The cross-examiner will frequently suggest to you distances and times of events when you do not recall the actual time or distance. Do not agree with him unless you would independently arrive at the same estimate as he gives. If you make an estimate, be sure to say it's only an estimate.

17. YOU HAVE TALKED WITH GOVERNMENT REPRESENTATIVES. There is no secret about the fact that you have talked with an Assistant U.S. Attorney or with other Government agents. Indeed there is no secret, of course, about anything you know about the case once you are on the stand. You will be under oath to tell whatever you know that you are asked. Some witnesses think there is something improper about talking to the prosecutor before trial and when asked if they talked with anyone will answer "No." The credibility of such a witness is, naturally, entirely destroyed because no lawyer will put a witness

on the stand without talking with him first. Your conversations with Government agents may, however, be the subject of leading questions designed to create a false impression. For example, if you are asked "Did you discuss your testimony?" and say "No" the impression is that you didn't talk with anyone; if you say "Yes" the implication is that you were told what to say. Here as with other leading questions, state the facts in your own words. For example, if it is true you can say "I talked with the Assistant and he asked me questions, and then went over it with me to see if his impression of what I knew was correct. He told me to tell the truth."

18. YOU MAY BE ASKED ABOUT PRIOR STATEMENTS. Under the law, defense counsel may get to see prior statements you may have made to Government agents. One group of questions may be designed to learn whether you made such statements. If you did sign a written statement, or if someone took notice while you were interviewed, there is no secret about that. On the other hand, if you are not sure, do not assume that someone was taking notes. That may lead defense counsel to demand nonexistent notes and could prove embarrassing to the Government. If you are not sure whether notes were taken or whether you signed a statement, you can simply say that you can't recall.

19. DON'T BE UPSET IF THERE ARE SOME INCONSISTENCIES. Anytime a person tells the same story twice, no matter how carefully, there are likely to be at least some inconsistencies. If there is an inconsistency with a prior statement you made, simply tell the best recollection you have of what happened, and if there is an explanation for the inconsistency, give it. Sometimes it can't be your mistake, but the mistake of the one who took your statement. If that is so, simply say that your recollection is that you told him something else, and you believe it's his mistake.

20. YOU DON'T HAVE TO DISCUSS THE CASE WITH ANYONE.

It is possible that the defendant, his counsel or someone on his behalf may ask to talk with you about the case. You are entirely free to do that if you want to. But you don't have to. Whether you do or not is entirely up to you. It is not up to the Government to tell you that you should or that you shouldn't discuss the case with the defense. But you should understand that you have no legal obligation to talk with anyone unless you wish to. The only time you are required to answer questions is on the witness stand on direct or cross-examination, and if the defense wants to subpoena you, they can do so and you will have to answer their questions on the stand. That is the only time you are required to talk. If you do discuss the case prior to taking the stand with the defendant or his counsel, remember that you will be asked about any claimed inconsistencies between what you say on the stand and what the defendant or his counsel may believe you told them. You will not have a stenographic transcript to establish what you said or did not say. In the event, of course, that you are subjected to any threats or pressure, you should contact the U.S. Attorney's Office immediately. Should that happen, try to note down exactly what was said to you as soon after the event as you can.

21. REMAIN DIGNIFIED ON THE STAND AT ALL TIMES. As a witness called on behalf of the United States in a federal criminal case, it is your duty to remain dignified on the stand at all times. Do not chew gum or have things which you may have brought with you, other than necessary records, in your hands while testifying. Wear appropriate clothing. In some cases, witnesses have appeared in combat boots to testify in Federal Court. This makes a poor impression on the Court. Never wisecrack in answer to a question or try to make fun of the cross-examiner. He has a right to ask questions and have them answered in a serious manner. Do not answer a question with another question unless it is to ask the cross-examiner to clarify what he is asking. Answers such as "How am I supposed to remember?" or "what would you have done?" are improper.

22. YOU ARE PERFORMING AN IMPORTANT PUBLIC SERVICE.

By testifying in a federal criminal trial, you are performing an important service for your country and



fulfilling an important duty as a citizen. Some witnesses look on testifying as an inconvenience. This is wrong, because if we wish to have the benefits of law enforcement we have to do our part to establish the facts. Whether there has been a violation, of course, is for the Court or jury to decide, not for you. Even if your knowledge seems small, it may form a crucial part of a larger mosaic that must be established for the case to be decided properly. You should look on the duty to testify as an opportunity to play a significant part in an important function of Government rather than an absolutely necessary requirement. The length of time other witnesses will take is largely beyond the control of the Government, as it depends on the length of cross-examination.

## 13.0 LABORATORY CONSIDERATIONS

### 13.1 INTRODUCTION

To many people, the laboratory is something like a magical "Black Box", where samples of every conceivable form is sent in one door, and then, given enough time and urgent phone calls to the chemists, the answers are wondrously, if not belatedly, received through the answer door. There is a little bit more to it than that; a great deal of preparation of samples must be done. There are instruments that need calibration and quality assurance samples to be done. After that, the reports must be calculated, and the data verified and entered into the computer. The types of analyses that are performed by the laboratory vary in the degree of complexity, but a rule of thumb that can be used is that the more answers that can be gleaned from a single analysis, the more complex the analysis, and the more effort and time that has to be invested into the procedure. The purpose of this section is to familiarize the reader more closely with the amount of work involved with each analysis to give him/her more appreciation of the effort and costs needed.

The reader should also understand that there is a tremendous amount of "overhead" associated with sample handling that does not appear on the data report sheets; sample storage, dumping, hazardous waste handling, quality assurance, and maintenance of supplies and instruments are also needed to keep the lab functioning and does not permit the chemist or biologist to work only on samples all of the time. Continual bureaucratic and administrative folderol also occupy a significant amount of time. The reader should also remember that one analyst performs several different types of analyses; the commitment of a person to one analysis means that others will not be done at that time.

## 13.2 SAMPLE LOG-IN AND DOCUMENTATION PROCEDURES

When samples are received in the laboratory, they must first be logged into the laboratory data system. At this point, the analyst is unaware that they are at the lab. To keep track of all the loose ends that could possibly occur, records must be unambiguous from the beginning. The beginning means THE BEGINNING. Of utmost importance, the paperwork that accompanies the samples to the laboratory must be complete and clear in order to expedite the log-in process. If the paperwork is wrong, resolving discrepancies takes time away from other duties, slowing the entire process. If there are problems and the person doing the logging cannot contact the sampler to clarify questions, the samples are in limbo for that much longer before they can be analyzed. The speed at which the samples are entered into the system also depends on other factors that are beyond the control of the lab; e.g., if the PDP-1170 is burdened with several users at the same time, or if it is taking a vacation, the entry process can be slowed considerably.

The first step in logging in samples is to verify that there is a sample for every sample number on the Field Sample Data Sheet. The number and types of sample containers are noted and checked that the analyses requested are appropriate for the containers present. An in-house form is prepared to document this step.

The next step for the records person is to enter the field data into the computer, establish the computer reporting forms for entering data into the computer, and generate bench data sheets for the chemists to transcribe the data onto. Bench data sheets are not generated for the pesticides, PCBs, or GC/MS organics analyses. GC/MS header sheets will be generated in the near future by the computer printer. Finally, a file is prepared to store all of the hardcopy data for the particular survey to be kept in the records room.

The amount of time required by this procedure depends a great deal upon the number of samples and analyses requested, and how unencumbered the computer is. For 10 samples for organic parameters, with all variables at the optimum level, the amount of time needed would be about 2 hours. If there are problems with the paperwork, that time would increase varying amounts. For 10 samples for inorganic, nutrient or metals, depending upon the number of parameters requested, the time is less, about 1.5 hours. Time is also needed to generate the bench data sheets on the printer, which can add to the time if there are many of them.

Special chain of custody or enforcement samples need much tighter controls as far as access to the samples and related data is concerned. They must be secured in a locked refrigerator and the paperwork must be kept in a locked file. For cases that get to court, much time photocopying lab books and similar documents is consumed.

Samples that are shown to be high in toxic or hazardous compounds require special treatment. If possible, the volume is reduced; but the sample cannot be merely dumped. It must be kept in a special disposal drum for removal to an approved disposal site. It is important, therefore, excessive amounts of a sample not be taken.

### 13.3 INORGANIC SAMPLE PREPARATION AND ANALYSIS

The parameters listed in this section are given on the Physical and General Inorganics and Ion Chromatograph Analysis Required sheet. They are the type of analysis that give only one answer per sample and are the simplest and quickest to run. The sample preparation steps are fairly quick; each of the parameters may use one or several of the steps. The basic preparation steps include weighing and/or measuring, filtration, and instrument calibration. Conductivity, pH, and turbidity only require instrument calibration. Methods that use titration techniques, such as total alkalinity or hardness, acidity, chloride, sulfate, sulfide, and the species of carbonate requires reagent standardization, and accurate measurement of the sample. Cyanide and fluoride require filtration in addition to the above steps.

The turbidimeter, conductivity meter, and pH meter are the instruments used for their respective parameters. They require initial calibration with a known amount of standard, periodic calibration checks during the analysis of the samples, but no accurate volume measurement of samples. Conductivity also requires temperature adjustment of samples. These parameters are the most rapid to perform; if sample preparation and calibration are included, about 10 samples of each parameter can be done per hour.

Titration involves more careful aliquot measurement of samples, in addition to preparation of standards and reagents. They generally rely upon end-point detection to quantify amounts. The end-point detection is done by color indicators or determined by ion specific probes, as for the sulfide determination. They are also fairly rapid to report; about 10 samples of each parameter can be analyzed per hour. Alkalinity and hardness are determined titrimetrically.

The ion chromatograph is similar to a liquid chromatograph in that several different species of ions can be analyzed with one injection. At the present time, only sulfate and chloride are regularly determined with the instrument. Sometimes cyanide samples are run to confirm values from a different technique. In the future, sodium, potassium, calcium, and magnesium will be determined on the ion chromatograph to expedite data reporting, rather than using the atomic absorption spectrophotometer. As with the above procedures, about 10 samples can be analyzed per hour.

A point to remember with all parameters is that if the samples are especially dirty and foul, they will probably require more than one analysis, possibly even 3 or more. In addition, an extremely dirty sample can contaminate the instrument and it would need purging or cleaning before more samples could be run. When several parameters are determined simultaneously on the same instrument, if one parameter is beyond the working limits of the standard curve, the sample must be analyzed again. This can bog down the final reporting process.

### 13.4 OXYGEN DEMAND, SOLIDS, AND NUTRIENTS

The oxygen demand analyses, Biochemical Oxygen Demand (BOD) and Chemical Oxygen Demand (COD) require the least amount of equipment to perform, but require a large amount of chemist's time to do. They are both titration techniques, using colorimetric endpoint detection. BODs require many BOD bottles, and a large incubator. Each sample is set-up in 3 levels of dilution and in duplicate, and allowed to incubate for 5 days, or longer if the method specifies. When the samples are set, the initial oxygen level is determined, and then other bottles are titrated after the incubation period. When preparation time is considered, it takes about 1 hour per BOD sample. CODs do not require incubation, but they do require digestion on a hot plate for about 4 hours. They are also titrated to measure the amount of oxygen consumed in the digestion process. As with the BOD, it takes about 1 hour for each sample.

The solids parameters also do not require much in the way of exotic equipment. What is needed is a balance (accurate to 0.0001 gm), a drying oven, and a muffle furnace capable of achieving temperatures of in excess of 400°C. Most of the time needed to perform these analyses is in the drying or ignition steps rather than hands-on chemist time. Total Dissolved Solids (TDS) and Total Solids (TS) need to be evaporated overnight, while 2 hours' drying time is enough for Total Suspended Solids (SS), Volatile Solids (TVS), or Volatile Suspended Solids (TVSS). But TVS and TVSS both need a 2 hour ignition time in a muffle furnace after the initial drying step. All solids samples must cool down in a desiccator before weighing for an hour after drying or ignition. The amount of hands-on time needed for TDS, SS, and TVS for 10 samples is about 1 hour; for TS, 30 minutes are needed, and 90 minutes are needed for TVSS. These times must be added to the drying and ignition times to arrive at the total analysis time. Percent Total Solids needs only about 15 minutes for preparation of 10 samples, but needs to dry overnight. The other solids parameters are done infrequently.

Most of the nutrient parameters are analyzed on the Technicon AutoAnalyzer II (AAII). Four of the parameters, dissolved ortho phosphate, nitrate-nitrite nitrogen, nitrite nitrogen, and ammonia nitrogen, are analyzed simultaneously. Cyanide and fluoride are also analyzed on the AAII. Kjeldahl nitrogen and total phosphorus require a digestion step before final determination. Kjeldahl nitrogen is then analyzed by the AAII, but total phosphorous is determined manually using a spectrophotometer. The first four parameters listed must first be filtered and transferred to small sample cups for analysis. A great deal of care must be used to prevent cross-contamination of samples during this process. The cups are next loaded onto a sampler and all four parameters are analyzed simultaneously on the same sample.

If one of the samples is beyond the linear range of the calibration curve, the sample must be run again. To analyze 10 water samples that are not particularly dirty requires almost 4 hours. Much of this time is set-up and preparation time; when more samples are done, the amount of time needed increases, but not proportionally. For Kjeldahl and total phosphorous analyses, about 6 hours are needed for 10 water samples, due to the digestion time.

All of the above parameters are reported by manual methods. The raw data is read from the instrument and then transcribed to the bench data sheet. Calculations are then performed on the data using factors that are listed on the sheet. The values are verified by another person before being given to the data records person for entry into the computer. This can lead to occasional clerical errors, but not very often. It is very slow and tedious, and adds more time to the total analysis procedure. If there are a great many samples, reporting can be a very large percentage of the total time.

### 13.5 METALS

Metals analysis involves a great deal more preparation than any of the previously mentioned parameters. A digestion step is necessary for all metals analyses, except the drinking water parameters, and that step can take a great deal of time if the samples are very dirty, or contain a lot of organic matter. The degree of effort needed for sample preparation increases from water samples up through soil/sediment/ sludge, tissue, oil/solvent, and EP TOX. If there is a large amount of organic matter, digestion must continue for a few hours until the samples are ready. They must be watched closely and more acid and/or other reagents are added as needed. The samples are then diluted to a known volume and then run on the atomic absorption spectrophotometer (AAS).

The AAS is automated for analyzing samples. An aliquot of the sample is transferred to a sample cup, and then the cup is put into the sampler. Metals run with the graphite furnace atomizer are fully automated. The initial instrument parameters are set, and the furnace automatically cycles through the proper drying, ashing, and vaporization steps for each sample and also does the desired amount of rinsing of the sampling probe to eliminate contamination. However, every time a new element is wanted, the lamp must be changed and properly aligned before the automated steps can be followed again. The final reporting step is also not automated. Although the microprocessor in the instrument can perform the calculations, the data still has to be manually transcribed to the bench data sheets and verified before they are given to the records person.

The amount of time needed to do 10 water samples for the priority pollutant elements, which consists of 13 different metals, is about 32 hours. For program workgroups that require more or fewer metals, the amount of time is proportionally greater or less. Sample matrix will also increase the time needed. With tissue samples, the amount of preparation time can increase by a factor of 4 or more if the desired tissue has to be dissected before it can be digested. So a set of 10 fish tissues for a hazardous waste workgroup of 24 metals would probably take about 2 weeks to complete. Additionally, if there are severe matrix interferences, the sample would have to be done by the method of standard additions, which involves spiking 4 sample replicates with increasing levels of the metal in order to graphically obtain an answer by extrapolation.

EP TOX metals for soils require a large amount of time for extracting the soils with a water solution and repeated checking of pH. For this reason, 10 EP TOX soil samples require about 6 days to complete.

## 13.6 ORGANIC PRIORITY POLLUTANTS

The organic chemicals analyses as performed by the Gas Chromatograph (GC) or Mass Spectrometer (GC/MS) give several parameters for each sample run. The main limitation as to the number of compounds that can be determined at one time is the number of compounds in the calibrating standard, and the quality of the resulting chromatogram. They are very complex analyses that requiring a great deal of time in all aspects of analysis- preparation, analysis, reduction and reporting. Additionally, very low levels of pollutants are routinely searched for, so extra caution is used to prevent cross contamination. Because very low detection limits for a large number of compounds are readily produced, analysis by these methods seems to be in high demand. Unfortunately, the capacity is finite, and limited largely by the number of persons available to work on the analyses.

The preparation of samples for analysis is a lengthy process. Only organic solvents can be safely injected into the instruments, so the samples have to be extracted from their original medium, and also concentrated to enhance detection limits. To avoid damage to the GC columns and enhance detection limits, additional cleanup of the samples may be necessary. Water samples are the quickest to extract; if there are no physical problems during the extraction, such as emulsions, 10 samples can be extracted is about 6 hours. When a set of samples are extracted, QA/QC samples, such as duplicate spikes and blanks are co-extracted in addition to the samples. If there are problems, the extraction could take from 8 to 10 hours, since the emulsions must be eliminated at each step before proceeding to the next one. Soil and sediment samples are extracted by continuous extraction using a Soxhlet extraction device, which extracts samples in a permeable, cellulose thimble by refluxing heated solvent from a reservoir for several hours. As many as 24 samples, blanks, and spikes can be extracted at the same time, but each requires further cleanup using gel permeation chromatography (GPC). GPC separates the compounds of interest from contaminants by a size exclusion process; large, contaminant molecules pass through faster than smaller molecules. GPC can only do two at a time, and needs about 1 hour for each pair of samples. Extracting 10 soil samples takes about 15 hours, including solvent volume reduction. Sludge samples, which are a combination of water and sediment or muck, take more time than soil samples. Tissue samples are the worst. The tissue, if it has been previously dissected from the animal, has to be mascerated in solvent 3 times using a high-speed homogenizer, and then reduced in volume, followed by GPC cleanup. They take the longest amount of time and effort, about 2.5 days or more for 10 samples. Before final volume reduction, the sample is split if both GC and GC/MS analyses are to be done.

Compounds that are similar to the compounds of interest are added to the samples prior to the extraction process to monitor extraction efficiency; they are called surrogate spikes. A GC separates compounds based on the different length of time a compound may spend in a column before elution into the detector. When the samples are ready for the GC, they are injected manually or automatically on the instrument. The instruments require daily calibration injections, and the samples must be analyzed on two dissimilar columns to confirm the presence of a target compound, i.e., compound present in the standard. Under conditions identical to the

injection of the standards, compounds positively identified in samples have the same retention time as in the standards. The raw data must be transcribed and calculated on bench data sheets to be reported. Pesticides, PCBs, and herbicides are measured on GCs. The herbicides also require an additional step to chemically change (derivatize) it into a compound that can be more reliably chromatographed. Considering only optimum conditions, 10 pesticide samples take 30 hours to analyze, PCBs take 24 hours, and herbicides take 45 hours. These times are increased the more complex and dirty the matrix.

There are a total of 5 GCs in use at the Region 10 Lab. They are used for the analysis of pesticides, PCBs, and herbicides. Each sample has to be injected twice on a GC on dissimilar columns in order to confirm the presence of a target compound. Each day that samples are run, a series of calibration standards must first be injected; they would include about 5 pesticide standards and 2 PCB standards. Three of the GCs have electronic data processors with them, while the other two use strip chart recorders. The chromatograms have to be reduced manually by measuring peak heights or areas. The data for the two GC runs are transcribed onto individual data report sheets prior to reporting the answers for a set of samples. On a best case basis, to analyze and report 10 samples, plus their blanks and spikes, two working days are required. If one or more dilutions must be made to get the samples on scale, then the time needed could take 4 or 5 days.

In the lab, there are 4 GC/MS instruments; two are dedicated to analyzing the base-neutral/acid (BNA) fraction and two are dedicated to analyzing volatile organic samples (VOA). Since there are several of these high-power instruments, one could naively assume that the Manchester Lab can produce data faster than the field personnel can send samples in to feed it; alas, that is very far from the truth. In the first place, not all of the steps necessary to report data are automated. It is true that the data system can automatically search for, find, quantify and report target compounds in a sample. However, there are many manual verification and bookkeeping steps also involved with the samples and other essential tasks that are part of the total analysis but not visible to the person requesting the data. The GC/MS analyst also must visually verify the presence of a compound by inspection of the mass spectra, calculate the concentrations, verify and calculate tentative compounds, calculate recoveries of the surrogate spiking compounds (which are indicators of extraction efficiency), archive the data on magnetic tape, collate the data for a set of samples, and perform several other relatively minor, but critical, jobs related to record keeping.

QA samples and procedures require much more time than on other analyses. Before any samples can be run, the instrument must pass certain tests. The mass calibration is checked by injecting a reference compound into instrument. If the instrument mass calibration meets certain specifications, then a standard must be injected. The standard contains selected target compounds that are either System Performance Check Compounds (SPCC), or Continuing Calibration Compounds (CCC). The SPCC compounds must exceed a minimum response factor (RF) value to demonstrate the GC/MS is functioning satisfactorily. The CCC compounds must have an RF that is within + 25% of the average RF of the initial five standard calibration curve. When these requirements are met, then regular analyses can proceed.



QA samples, such as blanks and spikes, are also run; they can account for at least 30% of the total number of runs, and some months have been as high as 65%.

The amount of time required to analyze 10 water samples for the BNA fraction, assuming the most optimum conditions, including blanks, standards, and spikes, is about 45 hours. Samples that need more than one injection per sample, and have many tentative compounds to report, may take twice or more as much time.

The VOA analysis by GC/MS is similar to BNA considering the instrument calibration. The actual sample preparation is much shorter. The target compounds are removed from the sample matrix by a purge and trap procedure that is a part of the instrumental analysis. The compounds are purged from the sample onto a trap by a stream of He gas for several minutes. A valve is switched, and the compounds are backflushed from the trap onto the GC column, where they are cryogenically concentrated at the top of the column. Thereafter, they are analyzed by a similar process as the BNA samples. Ten water samples that don't require dilution can be analyzed and reported in 35 hours; soil and sediment samples need a little more time because they have to first be weighed and the percent moisture determined. Solid samples that need extraction with methanol and then 2 or more analyses would need at least 3 times the amount of time.

The Manchester Lab also has two high performance liquid chromatographs (HPLC). This instrument can be used for any compound that is too unstable to be analyzed by GC. It is also useful for compounds that have a high boiling point and tend to degrade on a GC column during analysis. It can be used for other compounds that would normally need to be derivatized chemically before analysis on a GC. The HPLC is also useful for analyzing some compounds that are normally determined by GC/MS, but all of the other priority pollutant compounds are not wanted; sample turnaround times can be reduced. The HPLC uses a ultraviolet or fluorescence (or both) detector. The disadvantage of the HPLC is that it is not as sensitive as a GC, nor is it as selective as a GC/MS for PNAs. The HPLC is currently set up to analyze the polynuclear aromatic hydrocarbons (PNAs or PAHs); pentachlorophenol (PCP) has also been analyzed on it. The amount of time needed to analyze 10, relatively clean, water samples is about 20 hours; this includes extraction, analysis (one sample per hour), reduction and reporting. If the samples are dirty and/or have high levels of PNAs, then about twice as much time is needed.

Purgeable halocarbons and trihalomethanes are also analyzed on a GC, but are kind of a hybrid of a GC and a VOA analysis. The purge and trap method of separation is used, as with a VOA, but the detector used is a Hall Electrolytic Conductivity Detector, not a mass spectrometer. The Hall detector can detect compounds with halogen atoms, but not other aromatic (benzene) or aliphatic (unsaturated carbon and hydrogen) compounds. The raw data is recorded on chart paper with the chromatogram and a initial quantitation also printed. It can't detect benzene compounds unless they are halogenated. About 24 work hours are needed to analyze 10 water and QA samples; as with all the rest, more time is needed for highly concentrated samples.

### 13.7 ALLOCATION SYSTEM

The mission of the Manchester Laboratory is to meet the analytical needs of the EPA and WDOE programs. Nearly all of the EPA work performed at the laboratory comes from the Region 10 program offices, and all resources at the lab come from program elements controlled by the programs. It is therefore important that the programs have some method of determining whether they are getting their money's worth.

A laboratory allocation system is being developed that will tie laboratory activities directly to the FTE investment made by the programs. A program that contributes more FTE resources to ESD and the lab will receive a proportionally greater share of the laboratory's sample output. The initial system will allocate based on general program (air, water permits/compliance, etc.) and work station (GC/MS, nutrients, pesticides, metals, etc.) in a given time period. For example, Superfund might have an allocation of 10 BNA scans per month.

The programs will be in control of their allocation. Operation Offices will have to coordinate their needs with the programs for lab time. It is clear that not all programs will use their entire allocation during each allocation period. It is even clearer that during some periods, some programs will need more lab time than they are allocated. One person will be designated in each program to coordinate allocation. In addition to deciding how best to use the lab capacity available to the program, that person will also be expected to project future use. The Regional Sample Control Center will collate current and projected usage information and assist in "brokering" lab time. Laboratory analyses are expensive and the need for this service is vital. While it is not expected that the "brokering" process will be particularly time consuming, it will probably be quite active.

The allocation system is a new initiative. If only the EPA lab were involved, implementation of the system would be challenging with a real likelihood that many adjustments would be necessary before the system was working smoothly. Because the Washington Department of Ecology is located and even integrated with EPA laboratory activities, this period of adjustment will be even more interesting.

