CREATING AND MAINTAINING CHAIN OF CUSTODY

Purpose

This Water Quality & Hydrology Group (ENV-WQH) procedure describes the process for establishing and maintaining the proper chain of custody in the collection, management, and processing of ENV-WQH samples.

Scope

This procedure applies to the control and tracking of samples collected by ENV-WQH personnel or contractors.

In this procedure

This procedure addresses the following major topics:

Topic	See Page
General Information About This Procedure	2
Personnel Requiring Training to This Procedure	2
Creating a Chain of Custody	4
Maintaining Custody of Samples	6
Completing Chain of Custody Process	10
Records Resulting from This Procedure	11

First authorization review date is one year from Group Leader signature below; subsequent authorizations are on file in group office.

Signatures

Prepared by. Signature on file	Date: 4/6/06
Penny Gomez, ENV-WQH	
Approved by. Signature on file	Date: 4/6/06
Ken Mullen, ENV-WQH IM Team Leader	
Approved by. Signature on file	Date: 4/6/06
Steve Rae, ENV-WQH Group Leader	

CONTROLLED DOCUMENT

General Information About This Procedure

Attachments This document has the following attachments:

Number	Attachment Title	No. of pages
1	Sample Chain of Custody Form	1
2	ENV-WQH Chain of Custody System User Manual	18

History of revision

This table lists the revision history and effective dates of this procedure.

Revision	Date	Description Of Changes	
0	1/04	New document.	
1	5/05	Annual review changes	
2	4/05	Annual review changes	Jares

training to this procedure

Who requires The following personnel require training before implementing this procedure:

Personnel assigned to collect, package, and transport samples.

Training method

The training method for this procedure is "self-study" (reading) and is documented in accordance with the procedure for training (ENV-WQH-QP-024, Personnel Training).

General Information About This Procedure, continued

this procedure

Definitions to Chain of Custody: The requirement for demonstration of possession of a sample by only authorized individuals. The chain of custody (COC) process provides confidence and documentation in analytical data integrity by establishing the traceability of the data from the time of collection, to delivery, through processing, to final maintenance as a record.

> IM Team: The ENV-WOH Information Management Team (IM Team) works with data stewards to translate their sampling and QC requirements into a consistent format easily accessible to those collecting the samples.

The IM Team captures relevant information from completed COC forms and field notes in the WQDB for sample tracking purposes. The COC database application is maintained by the IM team.

ER SMO: The Environmental Restoration Project Sample Management Office (ER SMO) provides shipping for all samples. They also provide other services on occasion.

EDD: An electronic data deliverable (EDD) is a data file containing chemistry results from an analytical laboratory. It is in a specific format outlined by the IM Team.

Field Parameters: These are measurements and observations taken from samples in the field including, but not limited to, turbidity, conductance, pH, temperature, water level, and whether a visual inspection was performed.

Policies

Samples will be controlled to maintain legally defensible data and to prevent cross contamination or data loss.

The following documents are specific to this procedure:

- ENV-WQH-QP-025, Records Management
- ENV-WQH-QP-027, Managing Electronic Data
- ENV-DO-206, Sample Containers and Preservation
- ENV-DO-207, Handling, Packaging, and Transporting Field Samples

Note

Actions specified within this procedure, unless preceded with "should" or "may," are to be considered mandatory guidance (i.e., "shall").

Creating a Chain of Custody

Using the sampling schedule

Sampling activity is scheduled annually for planned and sampling and periodically for new programs and projects. That schedule is maintained in the Water Quality Database (WQDB). The sampling schedule is loaded into the database and will assign analytes, methods, bottles, preservatives, QC samples, and field parameters to a specific sample location.

All WQH sampling personnel have access to the sampling schedule through Oracle Discoverer. COC forms are customized for each sampling activity with pre-assigned chain of custody numbers, sample identification numbers, and other information required for sample collection, shipping, and analysis. See Attachment 1 for a sample COC form.

For the WQDB to generate COCs for new or unplanned sampling, provide the following information to the IM Team:

- Project cost code
- Source organization and data steward
- Field matrix
- Field prep
- Analytical laboratory
- Location name
 - If new location, provide X, Y coordinates
- Sample technique
- Analysis, method, and specific analytes
- Field parameters to be collected
- Sampling Frequency
- Campaign

At time WQH may help other groups with sampling activities. If a sampling plan cannot be made or maintained in the WQDB, the COCs will follow the same procedures an unplanned sampling and use an older version of a COC that is set up through an existing Excel spreadsheet.

Creating a Chain of Custody, continued

Initiating COC

A COC is initiated by the **sampler**. When assigned a sampling activity, the sampler shall perform the following steps in initiating a COC.

Step	Action
1	Print the COC form for the sample to be taken from the WQDB.
	For specific instructions on accessing the WQDB and using the
	WQH Chain of Custody Application, reference Attachment 2.
2	If any items are missing or incorrect on the COC they must be
	fixed prior to sampling. All changes need to go through the
	WQDB. If there are any problems or questions, contact the IM
	Team.

Maintaining Custody of Samples

Policy

A sample is physical evidence collected from a facility or the environment.

Chain of custody must be documented for all samples to verify that the possession and handling of samples is traceable at all times. A sample is considered in custody if it is one of the following:

- In one's physical possession.
- In one's view after being in one's physical possession.
- In one's physical possession and then locked up so that no one can tamper with it.
- Kept in a secure area where access is restricted to authorized and accountable personnel only.

NOTE: A secured area is an area that is locked, such as a room, cooler, vehicle, or refrigerator. If the area cannot be secured by locking, use a custody seal to secure the area or the sample container.

Completing COC Form

COC forms shall be completed immediately when samples are taken.

The **sampler** shall provide all information on the form in a legible format and in indelible ink.

Mandatory information for the COC includes:

Unique COC identification number Unique sample identification number(s) Analytical lab where samples are to be sent Matrix Program Cost Code Container description Number of containers Preservatives Name of lead sampler (sampler who assumes custody and control) and all other samplers present (provided by sampler) Date and time of sample was relinquished for shipping (provided by sampler)

Non-mandatory information on the COC may include field parameters, any problems with the sampling, and special instructions for the laboratory such as turn-around-times, reporting, and QC compositing.

Maintaining Custody of Samples, continued

Completing COC Form, Continued

If a sample is not collected, the **sampler** shall cross out the sample with a single line, initial and date the cross out, and give a reason the sample was not collected. The table below lists database-allowable reasons for not collecting a sample. If there is a new reason, contact the IM Team to add it to the database.

The **sampler** shall give a copy of the COCs with deletions and reasons to the IM Team. If data needs to be added, or modified in any way, contact the IM Team at email address referenced above. All additions, deletions, or changes of any kind, must go through the database for sample tracking purposes.

SAMPLE_STATUS_DESC
Area inaccessible
Area inaccessible-poison ivy
Area inaccessible-rattle snakes
Area inaccessible-rodent infested
Area temporarily off limits
Cancelled per project leader
Cancelled, did not follow procedure
Cancelled, due to weight limitations
Cancelled, insufficient budget
Cancelled, insufficient sample available
Cancelled, no snowmelt
Cancelled, removed from plan
Dry
Lab Error
Location frozen
Mechanical problem
No power
Not marked and could not find
Out of service-permanent
Out of service-temporary
Shipping Problem-broken containers
Shipping Problem-hold time issues
Shipping Problem-temperature
Source destroyed
Spring under water
Water level below pump
Well was not installed when sampling was scheduled
bottle broken in field
bottle missing in field
hold time expired before sample submission
port not operable yet
sample requires recollection
unnecessary qc removed from plan

Maintaining Custody of Samples, continued

custody

Transferring To transfer samples into the custody of another person or organization, the sampler shall perform the following steps:

Step	Action
1	Complete the "relinquished by/received by" and "date" sections of the form (Attachment 1). These sections of the form must provide a complete history of custody of the samples from collection to transfer to the analytical laboratory.
2	Ensure that samples are custody sealed when relinquished. Chain of custody tape shall be placed on each sample bottle so if the bottle is opened, the tape will tear.
3	Lead sampler initials the tape on each container.
4	Any tampering after the sample is relinquished should be documented by the receiving agency.
5	Submit the original COC form with the samples.

custody to **ER-SMO**

Transferring All samples are relinquished to ER-SMO for shipping. ER-SMO personnel will verify that samples submitted correspond with what is on the COC. ER-SMO must sign the COC to indicate acceptance of the samples, then send and relinquish it to the appropriate analytical laboratory.

If COC is broken

Whenever there is a break in the chain of custody of a sample, document the failure by initiating a deficiency report in accordance with ENV-WQH-QP-033, Issues Reporting and Action Tracking. The deficiency process will document the occurrence, evaluate the potential impact (if any) on the samples, and propose a fix to prevent recurrence.

Maintaining Custody of Samples, continued

Relinquishing samples for shipping

When the sampling is complete and the COC is properly filled out, the samples will follow the process set forth in ENV-DO-207, *Handling, Packaging, and Transporting Field Samples*, and be turned into the ER SMO for shipment to the analytical laboratory. The samples are then relinquished to the ER SMO sample custodian through the COC.

The **ER SMO** shall make two copies of the COC form. The original is submitted with the samples. One copy of the completed COC form is given to the individual submitting the samples and the second copy is faxed to the analytical laboratory. The **sampler** shall submit the first copy of the COC together with field notes containing the field parameters to IM Team.

The analytical laboratory will include a scanned image of the original COC form in the electronic data package and/or will include the original COC form in the hard copy data package, depending on the program. These are available on the ENV-WQH server at: ENV-WQH on '128.165.174.200'(S:)/ Data Packages. In addition, all copies given to the IM Team by the sampler are stored locally for one year before being sent to the Records Room..

All records are maintained in accordance with RRES-WQH-QP-025, *Records Management*.

Using field notes

All persons present at the sampling event, or who later handle the samples prior to being custody sealed, shall be identified in the field notes.

The IM Team stores copies of all COCs and field notes that contain field parameters and water levels.

Completing COC process (releasing field parameters)

Confirm sample collection The sampler shall complete the COC process after the IM team has completed the sample tracking. The sampler and IM Team shall perform the following steps:

Step	Action
1	Sampler shall drop off copy of COC and field notes including water levels if appropriate to the IM Team.
2	 The IM Team will complete the sampling event in the database using the COC and field notes: Samples are marked as being collected as planned or if a sample was not collected a reason is given. All field parameters including water levels are entered.
3	The lead sampler shall verify that the field parameters were entered correctly into the WQDB and either change or release the data. For specific instructions on accessing and using the Instruction for Confirming Field Parameters in the ENV-WQH Chain of Custody System, see Attachment 2.

package receipt

Confirm data When a data package with EDD and original COC is received, the date is entered in the database for tracking purposes.

Records resulting from this procedure

Records

The following records generated as a result of this procedure are:

- Chain of custody forms (also location sheet and container labels)
- Field notes
- Hard copy data package (for some programs)
- Electronic data deliverable (EDD)
- PDF Data Package



SAMPLE CHAIN OF CUSTODY FORM

Shed Main Ship Top Top Top Top Top Top Top Top Top To	Circuid Wilder		ENV-WQH	ηÒ.		
Analysis Request	Acr	Ship To: General Enganeing Labor Charleston, SC 2040 Savage Rd.		reis 7-8171	WOH Contact: But Vanden Plas Los Alamos Nation Laboration MS K497 DDP 598 Los Alamos, NM 8	
Fight Page: UF Preservable Desc 74.7 Wilth Comment		And the latest the lat	(843) 789-	4178	Sampler Initials	-
Field Propr. UF			Analysis Reque	sst		
Order State Desc Container Desc Qt		Field Prep: UF				
### Chain of Custod A	Onder Suffe Desc			727	WQH Comment	Analytical Lab Comments
Einstei: 4 Genud Total: 4 Cenud Total: 4 Chain of Custody cam: Chain of Custody Chain of Custody (sumplar) Chain of Custody Time Date Time Time Time Time Time Time Time Time Time	WO, WM, WP: S081A PEST	H	1			
Craud Total: 4	WG, WM, WP: 8081A PEST wWS					
crand Total: 4 team: Chain of Custody cam: Chain of Custody A Secretarial By Date Time						
chain of Custody.						
Chain of Custody (sampler) Time Received By Date Time	schmiggs.					
Chain of Custody (samplet) (samplet) (samplet) (samplet)						
Chain of Custody (sampler) Time Received By Date Time	TRAINIS COLOR					
Dava Time Received By Date Time (samplet)			Chain of Custod	ly v		
(amplet) Date Time Secarced By Date Time						
(include)			Received By	Date	Time	Reason for Transfer
	(sampler)					

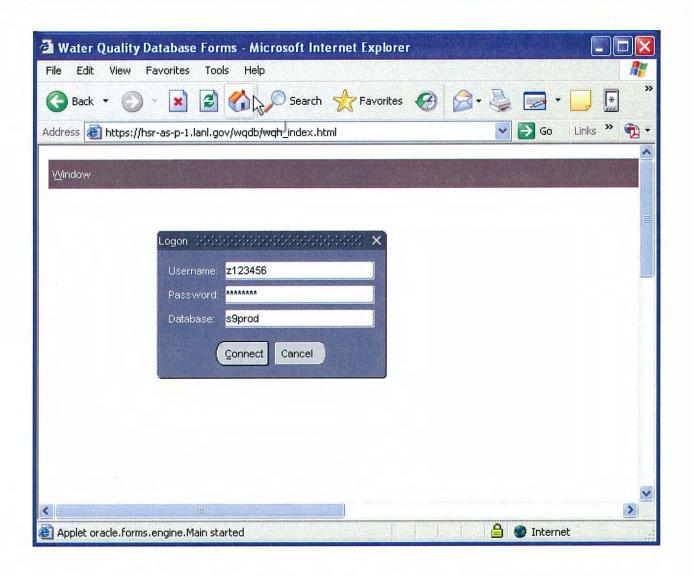
ENV-WQHChain of Custody System

Users Manual



Release 3 April 2006

Instruction for Generating Chain of Custody Forms, Labels, and Location Sheet



From your browser, connect to the Chain of Custody Application by entering: https://hsr-as-p-1.lanl.gov/wqdb/wqh index.html

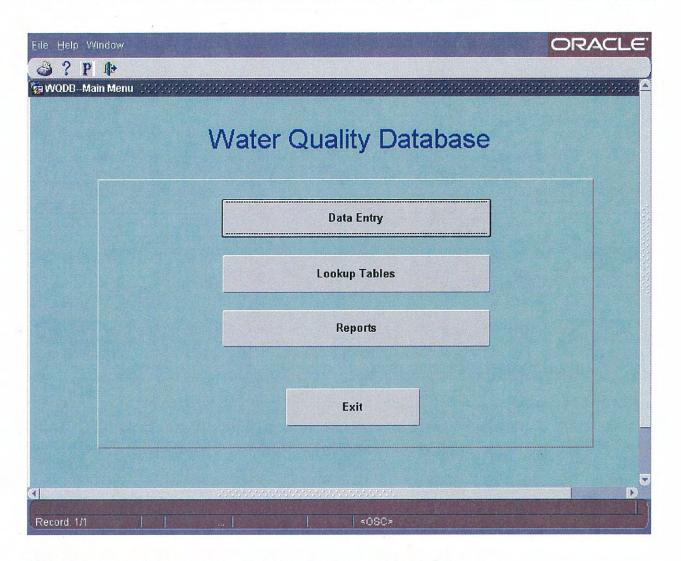
Log onto application by entering:

Username: "z" followed by your z-number

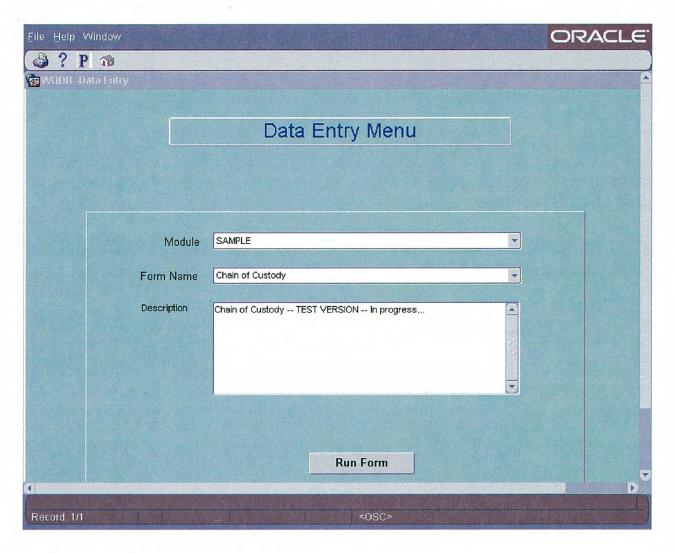
Password: this will be assigned to you

Database: sprod

10



When you see this screen, click on the "Data Entry" button.

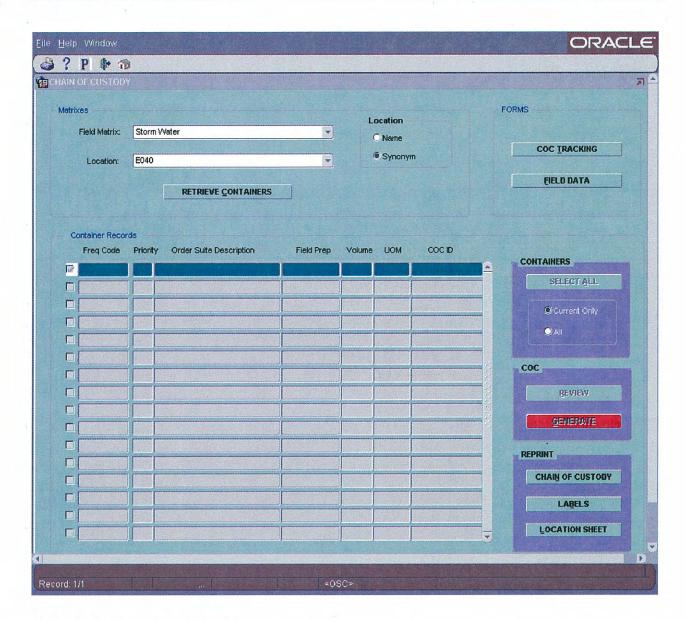


When you see this screen select:

Module: SAMPLE

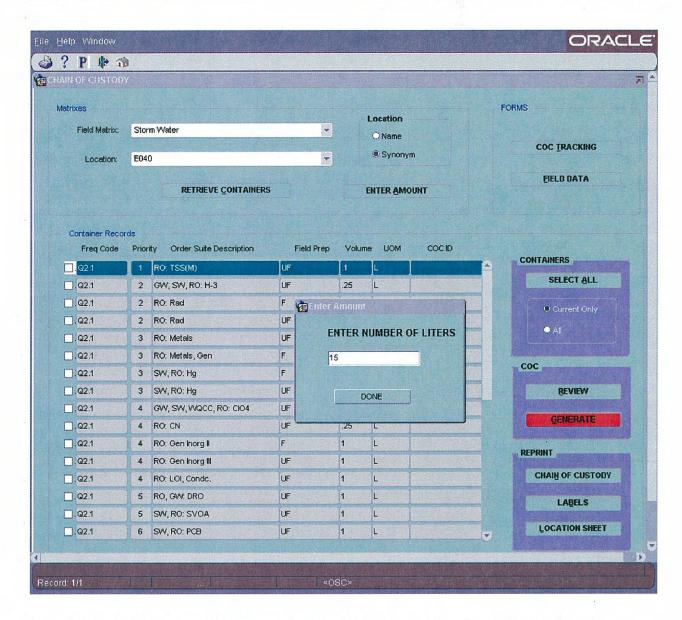
Form Name: Chain of Custody

Then click the "Run Form" button.

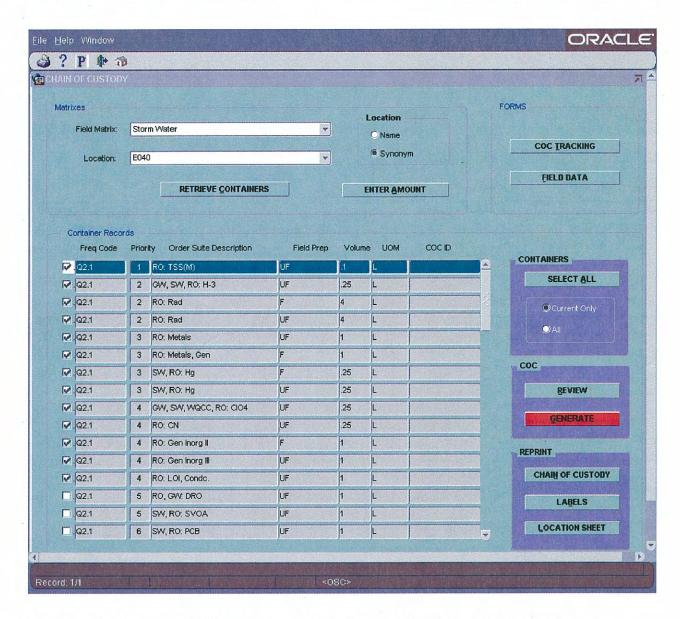


When you see this screen:

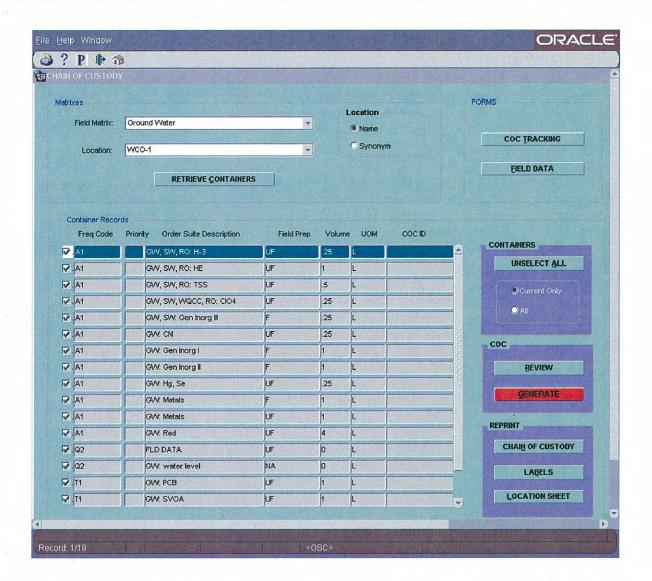
- 1. Choose the appropriate Field Matrix.
- 2. Choose the appropriate Location. Locations may be chosen using the name or synonym.
- 3. Click on the "Retrieve Containers" Button.



If a matrix of Storm Water is chosen, you have the option of entering the amount of water collected. This number will be used to calculate what analyses should be requested.



For storm water, entering the amount of water collected will select the analyses to be requested. You still have the option to select or unselect any containers.

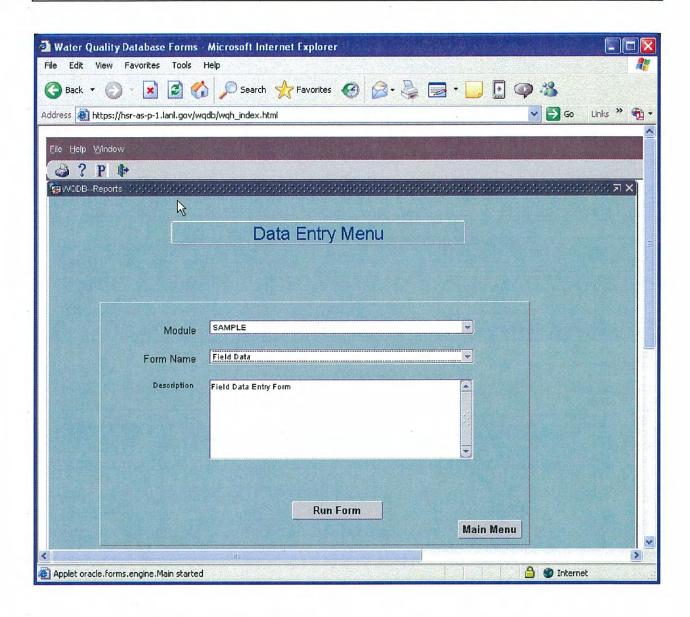


For all other matrices, you will typically want to choose "Current Only" and "Select All" under "Containers". This will select all containers that need to be collected at that time.

- 1. Click on the "Generate" Button.
- 2. A location sheet, and Chain of Custody form(s) will display as PDF's. Print these. The labels will automatically print out at the Zebra printer.

You will now have a chain of custody form, container labels, and location sheet. After collecting, submit a copy of the completed chain of custody forms and field notes to the Information Management (IM) Team. The IM Team will use the chain of custody forms to confirm in the database that all containers were collected and submitted. If a container is not collected or submitted, please draw a line through that container on the COC form and give a reason why it was not collected. If no samples are collected give a reason why and indicate the reason. The field notes will be used to enter the field parameters, water level, and if a visual inspection was performed.

Instruction for Confirming Field Parameters



From your browser, connect to the Chain of Custody Application by entering: https://hsr-as-p-1.lanl.gov/wqdb/wqh index.html

Log onto application by entering:

Username: "z" followed by your z-number

Password: this will be assigned to you

Database: s9prod

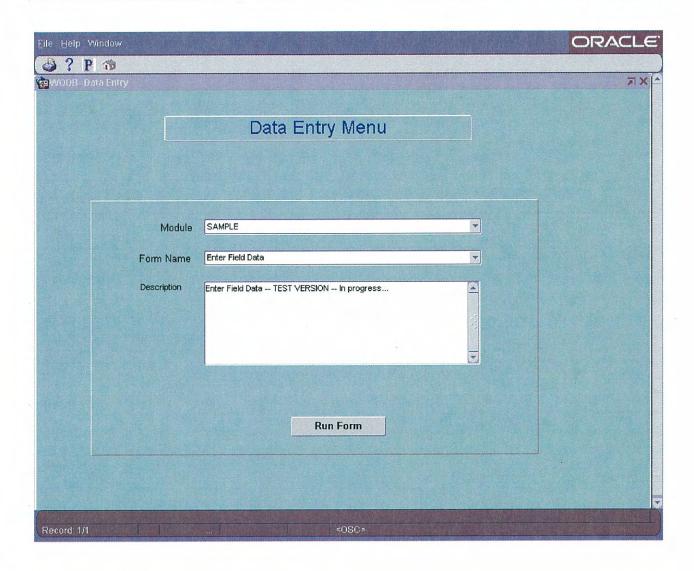
Username: "z" followed by your z-number

Password: this will be assigned to you

Database: sf8ip



When you will see this screen, click on the "Data Entry" button.

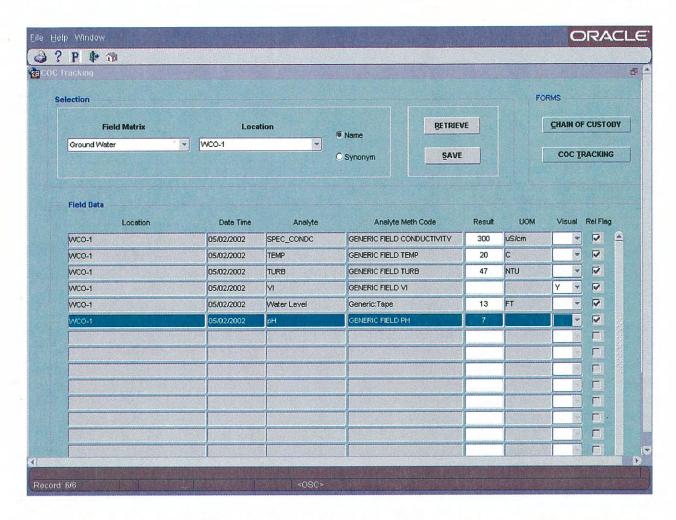


When you see this screen select:

Module: SAMPLE

Form Name: Chain of Custody

Then click the "Run Form" button.



- 1. Chose the "Field Matrix" and "Location" for the samples you want to confirm/release.
- 2. Click on the "Retrieve" button.
- 3. Correct any incorrect results.
- 4. Click on the release flag for each result.
- 5. Click the "Save" button.