EPA Region III

Users' Guide for Acquiring

Analytical Services

Prepared by:

Technical Support Branch Contracts Group
Office of Analytical Services and Quality Assurance

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1.0 Introduction

The Office of Analytical Services and Quality Assurance (OASQA) provides centralized analytical services and quality assurance support for Region III. EPA Order 5360.1 A2 (May 2000) requires the use of a systematic planning approach to develop acceptance or performance criteria and an approved QAPP prior to sampling and analysis. The QAPP is used as a tool by project managers to document the type and quality of data needed for environmental decisions and are used as a blueprint for the collection and assessment of data for all Agency environmental programs.

The Technical Services Branch Contracts Group (TSB Contracts Group) serves as a broker of analytical and technical services for the regional programs, and assists field personnel with the procedures for packaging, shipping, and documenting environmental sampling events. The TSB Contracts Group coordinates and manages the acquisition of analytical services through the following mechanisms:

Regional Program/Division	Service Description	Mechanisms Used
Superfund	Routine Analytical Services (RAS) – Fixed price routine analytical services	Contract Laboratory Program (CLP) OASQA Lab/ESAT
Superfund	Delivery of Analytical Services (DAS) – Analytical services needed by Superfund that are not available from the CLP	OASQA Lab/ESAT Commercial lab procurements Field Contractors or IAGs
WCMD WPD OECEJ APD CID EAID Other	Non-Superfund (NSF) - Analytical services provided to the non-Superfund programs of Region III	OASQA Lab Commercial lab procurements Buy-in to CLP or ESAT

2.0 Analytical Services Contact List

Service	Primary Contact	Secondary Contact
Superfund Contract Laboratory Program (CLP)		
Regional Sample Control Center (RSCC)	C. Harris	D. Slizys
RAS Scheduling Coordinator	C. Harris	D. Slizys
RAS Problem Resolution & Letters	D. Slizys	C. Harris
Data Package/Mail Receiving	D. Slizys	C. Harris
RSCC Database Tracking	C. Harris	J. Snyder (ESAT)
Request for Paperwork/Tags	J. Snyder (ESAT)	C. Harris
FORMS II LITE	D. Slizys	C. Harris
CST Database	J. Kwedar	C. Harris
CLP Project Officer (CLP PO)	D. Slizys	K. Thaung
RAS Rejection/Reduced Invoice Payment	D. Slizys	K. Thaung/R. Donovan
RAS CLP PE Requests	D. Slizys	K. Thaung
CLP Sample Projections	D. Slizys	C. Harris
RAS/ DAS CSF Evidence Audit	J. Kwedar	C. Harris
CLP Analytical Services Support (CLASS) Contractor Coordinators	Colin Walsh (FEDCSC)	
Electronic Sample Documentation System (ESDS)		
DAS Project Officer	J. Kwedar	K. Thaung
DAS Scheduling Coordinator	J. Kwedar	K. Thaung
DAS Problem Resolution & Letters	J. Kwedar	K. Thaung
DAS Rejection/Reduced Invoice Payment	J. Kwedar	F. Forman
DAS PE Request	K. Thaung	D. Slizys
DAS Bid Solicitations	J. Kwedar	K. Thaung/R. Donovan
DAS Invoice Inventory	J. Kwedar	E. Stiles
DAS CSF Evidence Audit	J. Kwedar	K. Thaung
DAS Bank Card Procurements (<$2,500.00)	R. Donovan	S. Ozer (CO)
DAS Procurements (>$2,500 to $25,000.00)	R. Donovan	S. Ozer (CO)
DAS Procurements (>$25,000.00)	S. Ozer (CO)	
ESAT Regional Project Officer	K. Thaung	F. Foreman
Non-CLP Data Tracking (ANSETS)	Beth Holman (ASB)	D. Slizys
Non-Superfund (NSF) Analytical Services		
Non-Superfund Scheduling Coordinator	J. Kwedar	K. Thaung
Non-Superfund Problem Resolution	J. Kwedar	K. Thaung
ASQAB Laboratory Sample Coordinator	P. Sosinski	J. Curry

Contact Information

Technical Services Branch Contract Group

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E-mail		**R3 Clients@epa.gov (internal only)**

OASQA Laboratory

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Pat Sosinski	**(410) 305-2667**	**sosinski.pat@epa.gov**

Regional Contracting Officer

Sidney Ozer	**(215) 814-5305**	**ozer.sidney@epa.gov**

CLP Contractor Support

Michelle Berardino (SMO)	**(703) 818-4544**	**cwalsh20@fedcsc.com**
Judy Snyder (ESAT)	**(410) 305-3015**	**snyder.judy@epa.gov**

EPA OSRTI/Analytical Services Branch (ASB)

Beth Holman	**(703) 603-8761**	**holman.elizabeth@epa.gov**

3.0 Superfund Analytical Services

3.1 Introduction

Region III has fully implemented the tiered **Field and Analytical Services Technical Advisory Committee** (FASTAC) **Strategy** by establishing a centralized analytical services brokerage team. This centralized approach channels all analytical requests through the TSB Contracts Group brokerage. The brokerage applies the FASTAC tiered decision approach to determine where samples will be analyzed. This process provides the region control over the process and reserves field contractor subcontracting (Tier 4) for emergency responses and other unique circumstances.

The TSB Contracts Group is supported by the TSB Quality Assurance Staff for QAPP/SAP approvals and QC. The Region 3 OASQA Lab (Tier 1) primarily analyzes non-routine or DAS samples. The ESAT contract provides services for data validation, analysis of samples and CEAT audits.

The brokerage is based on the **FASTAC Tiered Hierarchy**, as follows:

Tier 1: **U.S. EPA Regional Laboratory**
Tier 2: **Contract Laboratory Program**
Tier 3: **Delivery of Analytical Service through Commercial Laboratories**
Tier 4: **Field Contractor Subcontracting for Analytical Services**

There is some field subcontracting due to emergencies, labile nature of samples, short holding times, proximity of lab services and for services that are not provided by the CLP or the EPA Regional Lab. As a measure of control, field contractors must provide a documented justification form for approval to EPA site program officials prior to subcontracting;

3.2 Superfund Contract Laboratory Program (CLP) Routine Analytical Services (RAS)

The Superfund Contract Laboratory Program (CLP) is a national contract mechanism for obtaining Routine Analytical Services (RAS) for Superfund related field activities, including preliminary site inspections, remedial activities, monitoring, enforcement actions, or removal actions. The CLP provides a suite of fixed price contracts with standardized **Statements of Work (SOW)** for the analysis of water and soil/sediment samples to determine organic and inorganic contaminants. Modifications to the routine SOWs are also available through **Modified Analysis (MA)**. The EPA project lead can request a MA to modify the SOW to include additional compounds to the TCL list, lower quantitation limits, additional cleanup options, sample preparation options, or other requirements specific to site QAPP/SAP criteria.

The CLP is centrally managed by the Analytical Services Branch (ASB) within the Office of Superfund Remediation & Technology Innovation (OSTRI). The Contract Laboratory Program Project Officers (CLP POs) monitor the performance of CLP laboratories and provide technical support.

Regions schedule CLP samples through their Regional Sample Control Center (RSCC), which coordinates with ASB's contractor identified as Contract Laboratory Analytical Support Services (CLASS) or SMO. The CLASS contractor provides management, operation, and administrative support to the CLP. The CLASS contractor routinely receives Regional analytical requests, coordinates and schedules sample analyses, and tracks sample shipments.

The most current CLP SOWs are available on the Internet at the following web site:
http://www.epa.gov/oerrpage/superfund/program/clp/methods.htm

3.2.1 Available CLP RAS Contracts Statements of Work (SOW)

CLP SOW SOM01.2
ASB has combined the organic Low Concentration level SOW and the Multi-Media, Multi-Concentration levels into one SOW. The SOW offers 7, 14, and 21day turnaround times (TAT) with preliminary results (PR) available for Volatiles in 48 hours, for Semi-volatiles and Pesticides/PCBs in 72 hours. Electronic deliverables are required.

CLP SOW ILM05.4

Inorganic Analysis: Multi-Media, Multi-Concentration offers 7, 14, and 21 day turnaround times with preliminary results available in 72 hours for all TATs. The SOW offers low medium and low drinking level analytical services. Electronic deliverable is required.

3.3 Regional Delivery of Analytical Services (DAS)

The DAS program provides Superfund specialized analyses which are not available through the CLP. A combination of the OASQA Lab and procurement of services from commercial labs comprise the process. All DAS acquisitions are established and managed by EPA Region III. A team of Region III Contracting Officers and OASQA/ TSB Contracts Group Project Officers manage the program.

The matrices range from sludge, air, tissues, and individualized site wastes. Analytes can be anything from common metals to proprietary compounds for which there is very little historical data. DAS uses a wide variety of analytical services sources to fulfill customer's special needs.

4.0 Non-Superfund (NSF) Analytical Services

The U.S. EPA Regional Laboratory provides analytical services support to other regional non-Superfund programs. Some of the programs supported are RCRA, TSCA, Water, Air, NPDES, CID, EAID, CBP and Office of Enforcement, Compliance and Environmental Justice. Since most of these programs and offices have regulatory limits or criteria, the EPA laboratory staff provides not only analytical support but also expert witness testimonies in litigation procedures for these programs.

5.0 Requesting/Scheduling RAS, DAS and NSF Analytical Services

Region III field personnel or program personnel are responsible for initiating and submitting analytical requests. The intent of this guidance is to assist Region III project managers, site leaders and field personnel in the preparation and submittal of requests for the Superfund Contract Laboratory Program's Routine Analytical Services (RAS), Superfund Delivery of Analytical Services (DAS), and non-Superfund (NSF) analytical services. The TSB Contracts Group secures lab space, notifies customers of lab assignments, receives and provides shipping information, and assists in problem resolutions.

5.1 Procedure for Requesting/Scheduling CLP RAS and DAS Analytical Services

For Superfund CLP RAS and DAS requests, the process begins with the field sampler preparing an electronic Analytical Request Form (see attached). The electronic form can be downloaded from Region 3 web site at www.epa.gov/region3/esc. The form is then submitted via email to the Regional Project Manager (RPM), On Scene Coordinator (OSC), Site Assessment Manager (SAM) or other EPA project lead for approval. The EPA project lead approves and forwards the request via email 4 weeks prior to the sampling event to the TSB Contracts Group at email group **R3 Clients**.

The TSB Contracts Group forwards the request to the OASQA's TSB Quality Assurance (QA) Staff and OASQA Lab Branch. The QA Group determines whether the request matches the data requirements in the approved Quality Assurance Project Plan (QAPP) or site specific Sampling and Analysis Plan (SAP). After the assessment by the TSB QA Staff, the TSB Contracts Group applies the FASTAC decision tree to determine which analytical service would be most cost effective and meets the needs of the project.

After the TSB QA Staff QAPP compliance check, TSB Contracts Group splits out RAS and DAS parameters and the presents the request for OASQA Lab's consideration. If the selected service is RAS, the TSB Contracts Group will coordinate with SMO to schedule the work at a CLP lab and provide the lab assignment to the field samplers. Lab assignments are provided on a rolling schedule, the day after receiving the request. For example, if a request is submitted on a Monday by 3:00 p.m., lab assignments are available by noon on Tuesday. For requests that are submitted two or more weeks in advance of the sampling event, lab assignments are provided on the Tuesday one week before the sampling event. Requests submitted after 3:00 p.m. on Thursday will receive lab assignments on the following Monday.

If the OASQA Lab accepts the DAS request, the OSQAB Lab Sample Scheduling Coordinator will forward the acceptance notice to TSB Contracts Group, who notifies the field sampler. If the OASQA Lab declines the request, TSB Contracts Group procures analytical services from commercial laboratories. The TSB Contracts Group Contracting Officer (CO) has a warrant for awards up to $25,000.00. The CO makes the awards to the labs and notifies the sampler where to ship the samples. For analytical requests greater than $25,000.00, the TSB Contracts Group will perform a market research to determine labs available and capable to meet analytical requirements and provide results to the Regional CO in the Regional Office in Philadelphia for solicitation and award. The Regional Office CO will notify the field contractors which laboratory was awarded the contract and provide shipping information.

5.2 Procedure for Requesting/Scheduling NSF Analytical Services

For Non-Superfund (NSF) analytical services, the field sampler prepares an electronic Analytical Request form and emails the form at least 4 weeks prior to the sampling event to the TSB Contracts Group at email group **R3 Clients**.

The TSB Contracts Group forwards the request to the OASQA mangers for concurrence and for OASQA Lab's consideration. If the OASQA Lab accepts the request, the OASQA Lab's Sample Scheduling Coordinator will schedule the request for analysis with the sampler. If the OASQA Lab declines the request, The TSB Contracts Group will solicit requests for bids from commercial labs. If the bids are less than $25,000.00, the TSB Contracts Group will contact the program officials to receive funding information so that commercial lab services can be procured and samples scheduled. For bids greater than $25,000.00, the TSB Contracts Group will perform a market research to determine labs available and capable to meet analytical requirements and provide results to the Regional CO in the Regional Office in Philadelphia for solicitation and award. The Regional Contracting Officer will contact the program officials to arrange funding for the analytical services. The Regional Contracting Officer will notify the sampler which laboratory is awarded the contract and provide shipping information.

6.0 Procedure for Preparing Analytical Services Request Form

The Analytical Request Form is a Microsoft Word 2003 form (see attached). The request preparer enters all necessary information into the electronic form. There is a **Special Instructions** section at the end of the form to indicate special instructions or unique requirements such as: type of deliverables required, format of deliverables, TAT for preliminary results, sample preparation, Quantitation Limits (QLs), etc. If you are specifying QLs, you must provide a CAS number to specifically identify the compound requested. After the preparer completes the entry of all pertinent data, the request is either emailed to the EPA project lead (RPM, OSC, etc.) for approval and forwarding to **R3 Clients** (Superfund RAS and DAS), or emailed directly to **R3 Clients** (NSF).

7.0 Hard Copy Deliverables and Turnaround Times (TAT)

CLP: Hard copy data packages are available from the CLP in 7 days, 14 days and 21 days. The Analytical Request Form preparer specifies the hard copy TAT in the **Validated Data Package Due** field on the form. The data packages must be original and are sent within the specified TAT simultaneously to SMO and the RSCC for further processing. **PLEASE NOTE:** Quick TATs increase the cost of CLP and DAS deliverables and should be requested with discretion.

DAS: Hard copy data packages are in CLP format and are available as requested on the Analytical Request Form (either in the **Validated Data Package Due** field or in **Instructions**). The data packages must be original and are sent within the specified TAT the RSCC for further processing. See note under CLP for information regarding quick TATs for DAS deliverables.

OASQA Lab: Hard copy data packages are available as requested on the Analytical Request Form (either in the **Validated Data Package Due** field or in **Instructions**), or as negotiated with the EPA project lead. Data packages are delivered to the field sampler/requester and the EPA project lead within the specified TAT.

8.0 Preliminary Results (PRs)/Unvalidated Data:

Preliminary Results (PRs) is a contractually defined term used to deliver **unvalidated data to our regional customers from CLP labs.** Unvalidated data is available from the OASQA Lab, and the DAS commercial labs. The available formats are hard copy FORM Is, electronic FORM Is as .pdf files, or electronic data summary forms. The type of electronic format or hard copy must be entered in the **Instructions** section of the Analytical Services Request Form. **PLEASE NOTE**: PRs and unvalidated data increase the cost of CLP and DAS deliverables and should be requested with discretion.

CLP PRs TATs offered:

Volatiles	48 hours
Semi-volatiles, pesticides and PCBs	72 hours
All inorganics	72 hours

A CLP flex clauses may be used to request quicker turnaround times.

OASQA Lab: Unvalidated data are provided as specified in the **Special Instructions section** of the Analytical Request Form, or as negotiated with the EPA project lead.

DAS: Unvalidated data are provided as specified in the **Special Instructions section** of the Analytical Request Form.

9.0 Electronic Data Deliverables

CLP laboratories are required to provide an electronic deliverables as part of their CLP contract. SMO uses the electronic deliverables in Data Assessment Support Services (DASS) review process. The DASS review process of data checks for compliance, completeness, recalculation and instrument output. DASS electronic review consists of Contract Compliance Screening (CCS) to determine contract compliance and data assessment based on NFG criteria. Once the data is screened by DASS, it is placed in a database accessible by the EPA project lead through the internet. This DAT data is available about three days after the analytical TAT specified in the Analytical Services Request Form. DAT data is not validated data but it has been assessed by CCS and NFG criteria. DAT data is available as a spreadsheet or as a database electronic file.

Electronic data is also available in a variety of formats. The preparer must indicate the software (Lotus, Microsoft) and format (spreadsheet or database) of the EDD. Electronic data deliverables must be specified in the **Special Instructions** section of the Analytical Request Form. The electronic data deliverables can be downloaded into the end users' computer which facilitates the end user to more quickly assess data and make decisions.

10.0 Data Validation Process

This section provides an overview of the Superfund RAS and DAS data validation process in Region III. All Superfund analytical results produced by CLP, DAS labs or other contract labs must be validated. The data validation functions are performed by the Region III ESAT data review team. All data packages received by OASQA RSCC are transferred directly to ESAT for processing.

NOTE: Analytical results (both Superfund and non-Superfund) produced by the OASQA Lab are validated in house. Analytical results produced by a commercial lab for a NSF request are not validated, unless the EPA project lead requests and arranges for validation by an independent organization or through a "buy in" to the ESAT contract.

All data is validated using the Region III Modifications to the CLP National Functional Guidelines, and follows the Innovative Approaches to Data Validation, which identifies various levels of validation based on the use(s) of the data. On the Analytical Services Request Form, the data validation level is specified in the **Validation Level Fields**, and the requested turnaround time for validation is specified in **Validated Data Package Due field**.

Following is a summary of the validation levels:

Organic Data Validation
M1: DASS and manual verification of positive hits (blanks checked for contamination)
M2: DASS and manual QC verification
M3: DASS plus full manual validation
Inorganic Data Validation
IM1: DASS and manual QC verification
IM2: DASS plus full manual validation

Following is a table describing recommended data validation levels based on data use:

Region III Data Validation Data Uses Matrix					
Data Uses	**Organic Tiers**			**Inorganic Tiers**	
	M1	**M2**	**M3**	**IM-1**	**IM-2**
Oversight	**X**		X	**X**	X
Action Level Comparison	**X**		X	**X**	X
Initial Investigation		**X**	X	**X**	X
Nature & Extent		**X**	X	**X**	X
Preliminary Risk Assessment		**X**	X	**X**	X
Risk Assessment with Known High Level Toxins		**X**	X	**X**	X
Feasibility Study		**X**	X	**X**	X
Treatability Study		**X**	X	**X**	X
Preliminary Design		**X**	X	**X**	X
Initial Cleanup Verification		**X**	X	**X**	X
Risk Assessment with Marginal Risk			**X**		**X**
Low Level Contamination Nature & Extent			**X**		**X**
Cleanup Near Detection or Action Levels			**X**		**X**
Uses in Courts			**X**		**X**
Controversial Site			**X**		**X**

11.0 Paperwork Requirements for RAS, DAS, and NSF

Each analytical service has specific paperwork requirements. These paperwork requirements are summarized below. TSB Contracts Group will inform the customer which service was procured for analytical services and what type of paperwork is required for sample submission.

NOTE: The OASQA Lab has it own paperwork requirements for both Superfund and non-Superfund analyses as specified below. Other NSF services follow the DAS paperwork requirements.

ANALYTICAL SERVICES PAPERWORK REQUIREMENTS

Paperwork	RAS	DAS/Other NSF	OASQA (SF and NSF)
Chain-of-Custody	X	X	X
Hazard /Risk Sheet	NR	NR	X
Sample Numbering	X	X	NR
Sample Label & Tags	X	X	X
Sample Seals	X	X	X
Communicate Shipping Information	X	X	X

X Required
NR Not required

11.1 CLP RAS Paperwork Requirements

11.1.1 FORMS II LITE

FORMS II LITE is the mandatory electronic format for the Traffic Report/Chain-of-Custody (TR/COC) for all CLP requests. FORMS II LITE is an electronic windows based application which automates sampling event documentation. It generates a Traffic Report/Chain-of-Custody Form, sample tags, and container labels. FORMS II LITE must be used for all Superfund analytical services -- RAS and DAS. Access to FORMS II LITE software is available for downloading at: http://dyncsda01.dvncorp.com/itq/forms2Iite/.

11.1.2 Electronic Sample Documentation System (ESDS)

ESDS is a tool that allows FORMS II Lite Extensible Markup Language (XML) files to be uploaded and saved to a database. The data from the XML files is collected by SMO and used to provide shipping information to Contract Laboratory Program (CLP) laboratories. FORMS II Lite users may now submit FORMS II Lite XML files to SMO via ESDS. The F2L user (field contractors) can use this system to satisfy the ANSETS requirement by sending all DAS and their subcontracted analytical services as TR/COC files to SMO.

Instructions for Submitting FORMS II Lite TM XML *TR/COCs* to the Sample Management Office (SMO) via the Electronic Sample Documentation System (ESDS)

Requirements:

- Latest version of FORMS II Lite (version 5.1.47). The most current version of the application can be found by going to the FORMS II Lite Web site at http://dyncsda01.dvncorp.com/itq/forms2Iite/ and clicking on "Upgrade"
- Internet Explorer Version 5.0, or above or Netscape Version 4.0, or above
- Working Internet connection
- Valid email account

Exporting a FORMS II Lite TR/COC to an XML File:

- Click the "Export TR" button from the "PrinWiew a Specific TR" step in FORMS II Lite.
- Select the TR(s) you wish to export, making note of their specific TR Numbers.
- Select the "Include Site and Field QC Information" checkbox.
- Click the "Export TR" button.
- Select the drive and directory where the file will be saved, and make a note of the location.
- Name the file and click the "Save" button.

Uploading an XML file to ESDS

- Go to the SMO Superfund Customer Service Site located on the internet at: http://epasmoweb.dvncsc.com/scstr/
- Log on to the Web site using your User Name and Password.
- Select the "Browse" button and locate the XML file you wish to upload. Up to three separate XML files may be uploaded at the same time by selecting the "Browse" buttons.
- Click the "Upload" button.
- You will see a listing of your XML files separated out by TR Number. If applicable, select "Case complete" and/or "Resubmission" checkboxes. You may also enter comments, up to 250 characters in length, into the "Comments" box.
- Enter your email address in the email address field and click "Upload".
- A message will be displayed to notify you that your file(s) has been sent to the queue. Once the file(s) has been imported, ESDS will send a verification message to your email account.

If the file(s) is not uploading successfully, please check that you have the latest version of FORMS II Lite and that you have uploaded the correct file (must have an extension of ".xml").

Technical Resources

- For general questions or problems concerning ESDS please contact your SMO Coordinator.

- For questions or problems concerning FORMS II Lite, please contact the FORMS II Lite Help Desk at f2lite@dvncorp.com or (703) 818-4200.

11.1.3 Emergency TR/COC FORMS

There may be occasions or conditions when your field computer will fail. Emergency TR/COC Forms were created for those situations. You should download these forms and keep copies of these for emergency use. The URL address for the forms is as follows: http://www.epa.gov/superfund/programs/clp/trcoc.htm

11.1.4 CLP RAS Sample Numbering and Labeling

FORMS II LITE generates unique sample numbers that must be assigned to each organic and inorganic sample. The CLP Sample Numbers are printed on adhesive labels by the F2L software. You may also obtain unique sample numbers from SMO.

Organic Sample Numbers are in this format CXXXX, (five characters), and have ten labels per strip: four for extractables, two for volatiles and four extra.

Inorganic Sample Numbers are in this format MCXXXX, (six characters), and have seven labels per strip: two for Total Metals, two for Cyanide and three extra. Remember dissolved (field filtered) metals aliquots MUST be given a separate CLP Sample Number from total (unfiltered) metals aliquots.

Remember that the unique Sample Number must be used only once**. DESTROY THE UNUSED LABELS** to prevent duplication of sample numbers.

11.1.5 Communicating Shipping Information

Notify the CLASS Coordinator and the regional RSCC of all CLP sample shipments within 24 hours of shipment by e-mail. **CLASS must be notified by 3:00 PM on Friday for samples intended for Saturday delivery.** The following information is required:

Case Number
Name of Laboratory
Date of Shipment
Overnight Carrier (FedEx) Airbill number
Number and Matrices (Waters, Soils, etc.) of samples shipped
Information on completions, changes, delays continuations, etc.
Sampler's name and Phone number

11.2.1 DAS Paperwork Requirements

11.2.2 Chain of Custody

Region III uses FORMS II LITE (F2L) for chain of custody documentation. The

documentation is used to ensure that the integrity and possession of the samples is maintained from the time the samples are collected, delivered to the laboratory and to the time they are introduced as evidence in legal proceedings. The relinquisher (field sampler) must sign, date the form, place it into the cooler, seal the cooler lid with tape and place a custody seal between the lid and walls of the cooler. The laboratory receiver of the cooler (COC custodian) checks to determine if the custody seals have not been tampered with, opens the cooler and signs the chain of custody form indicating the time and date of receipt. The samples are placed in secure storage and later distributed to the analysts. Internal laboratory COC is applied during the preparation and analysis of samples. For more details on F2L see Section 11.1.1 of this guide.

11.2.2 DAS Sample Numbering and Labeling

DAS requests are assigned a DAS Request Number by the DAS Scheduling Coordinator. All DAS Request Numbers are expressed as follows: **R3XXX**.

DAS organic and inorganic sample identification numbers consist of (7) characters (R3XXX00). The DAS Request Number (R3XXX) is the beginning of the DAS sample identification number. The last two characters are assigned by the sampler to create a unique sample identification number. The last two characters in the identification number can be expressed in any numeric or alphanumeric combination. A filtered sample must be assigned a distinct and separate number. Preprinted sample labels will not be provided for DAS samples. FORMS II LITE software will generate DAS sample ID numbers.

Example of DAS Sample Identification Number:
DAS Request Number is: R3222
DAS Sample Identification Number is: R3222**01** (where 01 is sample identifier)

11.2.3 Communicating Shipping Information

Notice of shipping information for DAS cases must be e-mailed the DAS Scheduling Coordinator within 24 of shipment. Information for **SATURDAY DELIVERIES** must be requested by e-mail to the DAS Scheduling Coordinator by 3:00 p.m. on Friday so that the laboratory be notified. The following shipment information is required:

Case Number
Name of Laboratory
Date of Shipment
Overnight Carrier (FedEx) Airbill number
Number and Matrices (Waters, Soils, etc.) of samples shipped
Information on completions, changes, delays continuations, etc.
Sampler's name and Phone number

11.3 OASQA Laboratory Paperwork Requirements

11.3.1 Chain of Custody

FORMS II LITE or EPA Chain-of-Custody form must be completed and must accompany each sample shipment. See Sample Submission Procedures - Sample Identification.

11.3.2 Sample Numbering and Labeling

The OASQA Lab does not have a specified sample numbering system. Samplers should use their own identification system for sample numbering. See Sample Submission Procedures -Sample Identification.

Each sample container must have a sample label and tag. The information on the sample label and tag must be written with indelible (water proof) ink and must match the information on the Chain-of-Custody form. See Sample Submission Procedures - Sample Identification.

The sample shipping coolers must be sealed with strapping tape and EPA custody seals on the outside. The custody seal must be placed so that it will be broken when the cooler is opened. See Sample Submission Procedures - Shipping Requirements.

11.3.3 Communicating Shipping Information

Shipment information to the OASQA Lab must be communicated directly to the OASQA Lab Sample Scheduling Coordinator by e-mail within 24 hours of shipment. There is no Saturday delivery available to the OASQA Lab. The following shipment information is required:

Case Number
Date of Shipment
Overnight Carrier (FedEx) Airbill number
Number and Matrices (Waters, Soils, etc.) of samples shipped
Information on completions, changes, delays continuations, etc.
Sampler's name and Phone number

12.0 Paperwork Corrections/Memo-To-File

Shipping samples requires an enormous amount of paperwork. The key to error free paperwork is to have everything (COC, tags, labels, FedEx forms) filled out before sampling and to provide adequate time during sampling to check the paperwork. The TSB Contracts Group will inform the sampler when there is an error or discrepancy noted by the laboratory on the paperwork. The proper procedures for correcting errors and omissions on original legal documents are provided below:

- Errors and discrepancies discovered on paperwork prior to shipment of samples from the field is corrected by drawing a single line through the error and entering the correct information. Each correction must be initialed and dated.

- All paperwork errors and discrepancies discovered post shipment must be corrected by a memo-to-file.

- A "corrected" photocopy of the original or and "amended" record (chain-of-custody, sample tags) CANNOT be sent to the laboratory.

To correct errors or discrepancies on paperwork after the samples have been shipped to the laboratory, the sampler must write and distribute a "memo-to-file." A memo-to-file is a business letter on company letterhead -- not a memo -- addressed to the laboratory sample custodian or other designated laboratory personnel. Include a synopsis of the error which occurred and an explanation of the information which should have been sent or the action which should have occurred. It must be in a business letter format and signed by the sampler or project manager, if the original sampler is not available. A separate memo-to-file must be written for each separate case number and laboratory involved.

Do not include the site name and location when writing a memo-to-file to contracted laboratories. Refer to the site by the case number and Region, e.g., Region III, Case 23432. For samples which are sent to the OASQA Lab, the procedures for correcting the paperwork errors is the same with the following exceptions: (1) use the site name and location since case numbers are not assigned, and (2) CLASS does not receive a copy.

Include all pertinent case information. At a minimum include:

(1) carrier used
(2) airbill number
(3) date of shipment
(4) sample number(s)
(5) sample station location
(6) time and date of sampling
(7) sample tag number(s)

Upon receipt of the memo-to-file by the laboratory, it becomes part of the evidentiary file for that case.

Although there is no time limit for correction of the errors and discrepancies, the memo-to-file must be written as soon as an error is discovered.

12.1 RAS Memo-to-File Distribution

At least four copies of the original must be made with distribution as follows: (1) original to the laboratory, (2) copy to RSCC, (3) copy to CLASS, and (4) copy to the EPA Project Manager for the site. You may be distributing other copies, such as a copy to your company's central site files.

12.2 DAS Memo-to-File Distribution

At least three copies of the original must be made with distribution as follows: original to the laboratory, copy to RSCC, and copy to the EPA Project Manager of the site. You may distribute other copies, such as a copy to your company's central site files.

12.3 OASQA Letter-to-File Distribution

At least two copies of the original must be made with distribution as follows: original to the OASQA laboratory, and copy to the EPA Project Manager for the site. You may distribute other

copies, such as a copy to your company's central site files. For samples which are sent to OASQA, use the site name and location since case numbers are not assigned.

13.0 Sample Projections for RAS and DAS Analytical Services

The Contract Laboratory Program (CLP) needs sample analysis projections for Routine Analytical Services (RAS) quarterly so adequate laboratory capacity is reserved for the various analytical service contracts. Region III also requires quarterly projections for DAS analytical services.

Summarized quarterly projections must include a cover memorandum which lists sites that will be sampled during the next quarter. Electronic files in Microsoft Word to input summary projection data are provided upon request by the CST. There are three separate files: 1) ORGANIC RAS form, 2) INORGANIC RAS form and 3) DAS form. The ORGANIC RAS and INORGANIC RAS forms will have Statement of Work fractions listed and their associated turn around times. The DAS form requires the preparer to fill in the parameter and the number of samples to be sampled for each month of the quarter. Do not provide individual site projections or matrix information. Unique matrix information can be submitted in the cover memorandum.

Sample Projection Reporting Due Dates:

First Quarter:	August 10
Months:	October, November, December
Second Quarter:	November 10
Months:	January, February, March
Third Quarter:	February 10
Months:	April, May, June
Fourth Quarter:	May 10
Months:	July, August, September

Quarterly projections should be e-mailed to slizys.dan@epa.gov and harris.carroll@epa.gov, telephone 410-305-2734, fax 410-305-3095.

14.0 Reporting non-CLP Acquisitions to Analytical Services Tracking System (ANSETS)

OSWER Directive 9240.02 implemented the Analytical Services Tracking System (ANSETS) to collect all non-CLP Superfund analytical services data. OSWER Directives 9240.02A and 9240.02B identified the responsible parties for the collection of non-CLP Superfund analytical services. Non-CLP analytical services refer to any Superfund services that are not acquired or generated through CLP Routine Analytical Services (RAS). Superfund activities are those which are funded by Superfund or involve work at a Superfund site. Analytical services include any analytical data generated by fixed labs, mobile labs, portable equipment, and test kit analysis. Non-CLP analytical services participating parties include EPA laboratories, field contractors and their subcontractors, states, other federal facilities, and potentially responsible parties (PRP).

Field contractors must provide monthly reports on all non-CLP analytical services (field tests, mobile lab and fixed lab) and submit in electronic format directly to SMO. Directions for submission are on the

internet address as follows **`http://epasmoweb.fedcsc.com/scstr/`**

The sample management office (SMO) is offering **Electronic Sample Documentation System (ESDS)** for FORMS II LITE (F2L) users to export TR/COC files to SMO. The F2L user (field contractors) can use this system to satisfy the ANSETS requirement by sending all DAS TR/COC files and their subcontracted analytical services TR/COC files to SMO.

The field contractors are currently sending F2L TR/COC files for RAS to SMO. The ANSETS requirement can be satisfied by sending all DAS and field subcontracted analytical services TR/COC files to SMO.

The above language in this section should be included as follows:

- For new work, in instructions dealing with sampling and analysis protocols provided to the party prior to field activities.
- For Removals, with the order.
- For RI/FS and RD/RA work, in the Quality Assurance Project Plan (QAPP) or in the standard operating procedure (SOP) and in the scope of work provided to the party prior to work plan development.
- For ongoing work, the OSC or RPM should instruct the party to report this information to the oversight assistant at least on a monthly basis.

15.0 Field Log Book Documentation

Regardless of the type of analytical service provided, samplers must maintain a Log Book that documents the field activities. The information from the field logbooks becomes evidence and can be used in court. The following list is criteria for a field log book:

- Use a bound notebook
- Use indelible ink for entries
- Field log book entries should be factual, detailed, and objective
- Date and time all entries
- Each individual page must be signed by the person recording the information
- USEPA recommends that log book entries be reviewed. Include reviewer signature and date of review.

Examples of field log book entries:

- Date and time of entry
- Purpose of sampling
- Name, address, and affiliation of personnel performing sampling\
- Name and address of the responsible party, if known
- Type of sample, e.g.; sludge or wastewater
- Description of sample container
- Description of sample
- Chemical components and concentrations, if known
- Number and size of samples taken, including the corresponding sample tags numbers for each analytical fraction
- Description and location of the sampling point

- Date and time of sample collection
- Difficulties experienced in obtaining sample
- Visual references such as: maps or photographs of the sampling site. Include the film roll number, the frame number, and a written description of the picture for photographs
- Field observations, such as weather conditions during sampling periods
- Field measurements of the materials, e.g., conductivity, pH, temperature
- Whether chain-of-custody forms have been filled out for the samples; chain-of-custody form numbers
- GIS, GPS, related information (latitude and longitude) for site and each sampling location: if known
- Lab name, address and date shipped

ATTACHMENT 1

ANALYTICAL REQUEST FORM

U.S. EPA Region III Analytical Request Form

ASQAB USE ONLY		
RAS#		Analytical TAT
DAS#		
NSF#		

Site Activity:			
Site Name:		Street Address:	
City:	State:	Latitude:	Longitude:
Program:	Acct. #: 2007	CERCLIS #:	
Site ID:	Spill ID:	Operable Unit:	
Site Specific QA	Title:		Date Approved:
EPA Project	Phone#:	Cell Phone #:	E-mail:
Request	Phone#:	Cell Phone #:	E-mail:
Site Leader:	Phone#:	Cell Phone #:	E-mail:
Contractor:	EPA CO/PO:		

#Samples	Matrix:	Parameter:	Method:
#Samples	Matrix:	Parameter:	Method:
#Samples	Matrix:	Parameter:	Method:
#Samples	Matrix:	Parameter:	Method:
#Samples	Matrix:	Parameter:	Method:
#Samples	Matrix:	Parameter:	Method:
#Samples	Matrix:	Parameter:	Method:
#Samples	Matrix:	Parameter:	Method:
#Samples	Matrix:	Parameter:	Method:

Ship Date To:		Org. Validation Level	Inorg. Validation Level

Unvalidated Data Requested: ☐ No ☐ Yes If Yes, TAT Needed: ☐ 14days ☐ 7days ☐ 72hrs ☐ 48hrs ☐ 24hrs ☐ Other (Specify)

Validated Data Package Due: ☐ 42 days ☐ 30 days ☐ 21days ☐ 14 days ☐ Other (Specify)

Electronic Data Deliverables Required: ☐ No ☐ Yes (EDDs will be provided in Region 3 EDD Format)

Special Instructions:

FORM ARF- 10/06