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 Organization Paducah Remediation Services, LLC, SPCI
 Document Number _____ Number of Pages 300 pages
 Accession Number (DMC only) _____
 Document Title/Date PRS-ENM-2708, CHAIN-OF-CUSTODAY FORMS, FIELD SAMPLE LOGS, SAMPLE LABELS, AND CUSTODY SEALS, 03/12/2007

Author _____ Corporate Author _____

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OPSEC *M Brennan* Date MAY 11 09

OWNER: Environmental Monitoring	PRS-ENM-2708	REV. NO. 0
SUBJECT MATTER AREA: Sampling	PREPARER: Tracy Kulik	Page 1 of 14
DOC TYPE: <input checked="" type="checkbox"/> PROCEDURE <input type="checkbox"/> POLICY	APPROVED BY/DATE:	
PROC TYPE: <input checked="" type="checkbox"/> OPERATING PROCEDURE <input type="checkbox"/> FACILITY SPECIFIC PROCEDURE FACILITY: _____	Tracey Brindley (Signature on File in DCC) 3/5/07	
TITLE: CHAIN-OF-CUSTODY FORMS, FIELD SAMPLE LOGS, SAMPLE LABELS, AND CUSTODY SEALS		
USQD <input checked="" type="checkbox"/> UCD <input checked="" type="checkbox"/> CAT EX <input type="checkbox"/>	EFFECTIVE DATE: 3/12/07	
USQD/UCD No: USQD-PH-SITE-0037/R1-UCD-PH-SITE-0075/T1	REQUIRED REVIEW DATE: 3/12/10	
Mandatory Subcontractor Pro Forma Procedure? <input type="checkbox"/>	If an interim Procedure, Expiration Date:	

REVISION LOG		
Revision Number	Description of Changes	Pages Affected
0	Initial Release. Intent Change. Changed numbers and headings to define the beginning point of PRS documentation. This document replaces BJC-ES-2708, Rev. 0, <i>Chain of Custody Protocol for Environmental Sampling</i> .	All

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1.0 PURPOSE

The purpose of this procedure is to describe the use of COC forms to track samples and ensure the integrity of those samples by documenting possession of transfers from the time of collection to acceptance by the designated laboratory. It includes requirements for the generation, use, and completion of COC forms, sample labels, and custody seals.

2.0 SCOPE

The requirements of this procedure apply to sampling performed for PRS and its subcontractors at the Department of Energy-owned Paducah Site.

3.0 PRECAUTIONS AND LIMITATIONS

To simplify the COC record and minimize the potential for error and other problems, as few people as possible shall have custody of the samples.

Entries on the COC form and sample labels shall be made using black indelible ink. Entry errors shall not be erased, altered, or otherwise rendered illegible. Void entry errors by drawing a single line through the entry, and initial and date the correction. Insertions after the initial entry should be initialed and dated. Do not use correction tape and white-out.

4.0 PROCEDURE

NOTE: The PRS blue-sheeted BJC procedures referenced in this document are the active procedures as of the date of issuance of this procedure. Procedures noted in parentheses will become the reference procedures once these procedures are approved and implemented by PRS.

4.1 Pre-Performance Activities

4.1.1 Individuals who record information on COC forms, sample labels, and custody seals shall be knowledgeable of the latest version of this procedure before beginning any activities.

4.1.2 Gather needed supplies prior to the start of work. The items listed in this section may be used as a guide; however, additional items may be needed as determined by the Work Package.

- COC forms generated from Paducah PEMS database
- Sample labels generated from Paducah PEMS database
- Custody seals, as defined in section 4.7
- Extra blank COC forms, sample labels, and custody seals
- Black indelible ink pens
- Clear tape to cover sample labels, if they are not waterproof
- Logbook

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4.2 Chain-of-Custody Form Generation

- 4.2.1** The Sample Handler is responsible for collecting, properly handling, and maintaining and documenting custody of the samples until they are formally transferred to another person or the laboratory.
- 4.2.2** A separate COC form shall be used for each laboratory that will perform sample analysis. COC forms should be pre-printed from the Paducah PEMS database if possible. In the event Paducah PEMS is not accessible and sampling is required, an equivalent COC shall be used. See Attachment B for an example of a blank COC.
- 4.2.3** The COC form(s) typically includes the following information:
- Project Identification Number
 - Sample ID Number
 - Sampling description and location
 - SOW number
 - Lab COC Number
 - Laboratory Name
 - Sample Types
 - Container Sizes and Types
 - Number of containers
 - Sample Preservatives
 - Matrix Codes
 - Analysis requested
 - Date and time of collection
 - Sampler's initials

4.3 Chain-of-Custody Form Completion

- 4.3.1** All entries on the COC shall be made using black indelible ink.
- 4.3.2** Documentation of COC is accomplished by using a COC form. The COC follows the sample from the time of collection to receipt by the laboratory that will analyze the sample and sometimes until the sample is disposed (see Attachment C for an example COC form generated from Paducah PEMS).

NOTE: Field sample logs have been used in the past to document initial custody, but no longer will be used.

- 4.3.3** Record the following information at the time of the sampling event:
- Date and time sampled (military time)
 - Sample handler's initials
 - Volume of sample (if required for specific analysis and calculations)
 - Any relevant comments

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4.3.4 When an ad hoc sample is collected in the field, record all of the required information based on the list in section 4.2.3, to the extent known, on a blank COC form (see Attachment B) and in the Field Logbook in accordance with BJC-ES-2700, *Field Logbooks*, (PRS-ENM-2700, *Logbooks and Data Forms*).

4.3.5 When samples are not collected, draw a “Z” line through the uncollected samples shown on the prepopulated COC form. Initial and date the “Z” line and provide an explanation as to why the sample was not collected.

The explanation shall be more descriptive than “not collected” or “not needed” or “could not collect.” Acceptable explanations must state why the sample was not collected, why the sample was not needed, or why the sample could not be collected. Examples of acceptable explanations include, but are not limited to these:

- Not collected due to poor recovery from the boring;
- Not needed because sample is a matrix spike; and
- Could not be collected because the well was dry.

4.4 Sample Label Generation

4.4.1 Sample labels are required to provide identification of samples collected for analysis at laboratories. When *in situ* measurements are made, the data are recorded directly in the logbook at the time of sampling along with the identifying information and any field observations.

4.4.2 Sample labels should be preprinted from the Paducah PEMS database if possible. In the event Paducah PEMS is not accessible and sampling is required, a Paducah PEMS equivalent label shall be used. See Attachment D for an example of a blank sample label. The following information typically will be included on the label:

- Project identification number
- Sample identification number
- Sample location ID
- Lab COC number
- Matrix Code
- Analysis to be performed
- Container size and type
- Preservatives used
- Laboratory name
- Date and time of collection
- Samplers initials
- NCS exempt designation of “PF” or “NCS Exempt” (contact the data manager for guidance if this information is unknown)

4.4.3 When an ad hoc sample is collected in the field, record all of the required information, to the extent known, based on the list in section 4.4.1 on a blank label (see Attachment D) and in the Field

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Logbook (see BJC-ES-2700, *Field Logbooks*, [PRS-ENM-2700, *Logbooks and Data Forms*]).

4.5 Sample Label Completion

- 4.5.1 All entries on labels shall be made using black indelible ink.
- 4.5.2 Sample containers should be labeled prior to collection of the sample, to the extent feasible.
- 4.5.3 The following information shall be filled in at the time of sample collection:
- Name or initials of sample collector(s),
 - Date and time (military time) of sample collection.

4.6 Special Sample Labels Required

If the samples to be collected contain material that exhibit any characteristic of hazardous waste, such as ignitability, corrosivity, reactivity, or toxicity, or is from a known or suspected asbestos or PCB source, contact the waste management group for guidance on any special labels that may be required before the samples are collected. Appropriate labels are applied based on process knowledge, source, or waste container labeling.

4.7 Custody Seals

- 4.7.1 In this document, custody seals include tape-like seals, tamper indicating tape, and tamper indicating devices that must be broken or removed to open the container after they are applied. Custody seals are used to guard against tampering and as a means to observe visually if tampering has occurred.
- 4.7.2 Any automatic composite sampler shall be secured with a custody seal or padlock to control access to the sample during collection.
- 4.7.3 **IF** samples are kept under positive control, as defined in Section 4.8, from the time of collection until the samples are delivered to the laboratory for analysis, **THEN** custody seals are not required.
- 4.7.4 **IF** the samples are going to be shipped or cannot be kept under positive control, as defined in Section 4.8, from the time of collection until the samples are delivered to the laboratory for analysis, **THEN** custody seals are required, and the following steps shall be followed.
1. As appropriate, use the following:
 - Custody seals with adhesive backs (See Attachment D for an example)
 - Tamper indicating tape
 - Tamper indicating devices such as a uniquely numbered

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- zip tie style (or similar) band, or
 - Padlock
- 2. **IF** an adhesive backed custody seal is used, **THEN** sign and date the custody seal.
- 3. **IF** a zip tie style (or similar) band tamper indicating device is used, **THEN** record the unique identification number(s) on the COC and in the logbook.
- 4. Attach the seal or tamper indicating device to the container across the opening(s), so that the seal must be broken or removed to open the container.

4.7.5 IF a sample or shipping container must be opened as part of the sampling or shipping process (e.g., filtering a sample, adding additional ice to a composite sampler, adding additional materials to shipping container), **THEN** a new custody seal shall be applied. Record the action on the COC and in the logbook.

4.8 Positive Control

Maintain “positive control” of samples and COC forms from the time of collection until transfer to another custodian. “Positive control” requires one or more of the following:

- Physical possession;
- Visual control/oversight;
- Secured storage (i.e., lock and key) that only personnel authorized to handle the samples and COC forms can obtain keys to access; or
- Located in a secure area, with access to that area restricted to personnel authorized to handle the samples and COC forms.

4.9 Custody Transfer

4.9.1 To simplify the COC record, as few people as possible should handle the samples. Transfer of samples between field personnel in the same work group or between lab personnel in same work group does not need to be documented on the COC form; however, positive control of the samples must still be maintained. Before custody is transferred, ensure completeness of COC records.

4.9.2 When sample custody is transferred (e.g., for further processing, packaging, or transporting), the Sample Handler shall sign the form as “relinquished by” and enter the date and time. The receiving person shall verify sample container integrity and completeness of the COC form(s), sign the form as “received by” and enter the date and time of receipt. Each custodian must maintain positive control (see Section 4.8) of the samples and COC forms.

4.9.3 IF custody is transferred directly to another person, **THEN** the date/time will be the same for both the relinquished and received signatures.

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4.9.4 IF the samples are shipped off-site, **THEN** the date/time will NOT be the same for the relinquished and received signatures.

4.9.5 On-site Laboratory Analysis

4.9.5.1 Transfer the samples and the original COC forms to the laboratory Sample Custodian.

4.9.5.2 Obtain a copy of the COC record and forward a copy of the signed COC record to the PRS Data Manager.

4.9.6 Off-site Laboratory Analysis

4.9.6.1 Common carriers (e.g., Federal Express), are not required to sign the COC record. When samples are shipped to an off-site for analysis, the COC record is signed by the laboratory Sample Custodian upon receipt at the laboratory; therefore, the date/time will not be the same for the relinquished and received signatures.

4.9.6.2 IF the samples require off-site shipment, **THEN** place the original COC form in a watertight bag and secure the bag inside the shipping container. Ensure custody seals are applied to the containers in accordance with Section 4.7.

4.9.6.3 Process the off-site shipment according to the applicable Department of Transportation regulations. Follow PRS procedures for shipment to the laboratory for analysis.

4.9.6.4 When the signed COC is received from the off-site laboratory, forward a copy of the signed COC record to the PRS Data Manager.

4.10 Post-Performance Activities

Submit a copy of the COC form to the PRS Data Manager for entry into Paducah PEMS.

5.0 RECORDS

Once the COC form is completed, it becomes a QA record and a copy of each form shall be maintained according to BJC-OS-1001, *Records Management, Including Document Control* (PRS-DOC-1009, *Records Management, Administrative Records, and Document Control*).

6.0 SOURCE DOCUMENTS

U.S. Environmental Protection Agency, November 2001. *Environmental Investigations Standard Operating Procedures and Quality Assurance Manual*, Section 3.5. Region 4, Environmental Compliance Branch, Athens, GA.

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Attachment A
DEFINITIONS/ACRONYMS
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DEFINITIONS

Ad Hoc Sample - Unplanned sample.

Chain-of-Custody - A process used to document the transfer of custody of samples from one individual to another from the time of collection until final disposition.

Custody - That process of assuring positive control (see Section 4.8 for more information) of a sample's integrity from the time of collection to receipt by the laboratory that will analyze the sample and sometimes until the sample is disposed. Documentation of COC is accomplished by using a COC form.

Custody Seals - A tape-like seal, tamper indicating tape, or tamper indicating device that must be broken or removed to open the container after it has been affixed. Custody seals are used to guard against tampering and as a means to observe visually if tampering has occurred.

In Situ Measurements - Field measurements of sample characteristics taken and recorded at the time of sampling. Examples of *in situ* measurements include pH, temperature, dissolved oxygen, conductivity, and flow measurement.

Logbook - A bound book with sequentially numbered pages used to create a permanent, near real-time record of activities and conditions, significant events, observations, and measurements that occur during each day of field activities.

Project Manager - The person (or designee) responsible for ensuring that activities are performed in accordance with the current, approved plans or other governing documents and associated procedures. The project manager approves (or coordinates the approval of) deviations from the approved plans or other governing documents.

Sample Handler - The person who collects the sample and maintains custody of the sample following the requirements of this procedure until custody is transferred to another person. This person is responsible for overseeing the possession, exchange, and storage of the samples and COC forms.

ACRONYMS

BJC - Bechtel Jacobs Company LLC
COC - Chain-of-Custody
FSL - Field Sample Log
PEMS - Project Environmental Measurements System
PRS - Paducah Remediation Services, LLC
SOW - Statement of Work
NCS - Nuclear Criticality Safety
PF - potentially fissile

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Attachment B
EXAMPLE OF A BLANK CHAIN-OF-CUSTODY FORM
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(Page 2 contains a full size copy of a blank COC form, which may be used directly. The COC form has no headers.)

Sample Chain-of-Custody Record

Sampling Description: _____	Sample Relinquished By _____ Date/Time _____
Sample ID: _____	Received By _____ Date/Time _____
Date/Time Sampled: _____	Sample Relinquished By _____ Date/Time _____
Project ID: _____	Received By _____ Date/Time _____
Sampler: _____	Sample Relinquished By _____ Date/Time _____
Station: _____ Laboratory: _____	Received By _____ Date/Time _____
LAB COC NO.: _____	Sample Relinquished By _____ Date/Time _____
Turnaround: _____	Received By _____ Date/Time _____

Analysis Requested _____

Matrix Code _____ Bottle Type _____ Bottle Size _____ No. of Bottles _____ SOW No. _____

Preservatives _____ Sample Type _____

Miscellaneous: _____

Analysis Requested _____

Matrix Code _____ Bottle Type _____ Bottle Size _____ No. of Bottles _____ SOW No. _____

Preservatives _____ Sample Type _____

Miscellaneous: _____

Analysis Requested _____

Matrix Code _____ Bottle Type _____ Bottle Size _____ No. of Bottles _____ SOW No. _____

Preservatives _____ Sample Type _____

Miscellaneous: _____

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Attachment B
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Directions for Completing a Blank Chain-of-Custody Form

Most of the information needed below can be obtained from the data manager or the laboratory coordinator if it is not already known.

Sampling Description – Describe what is being sampled (e.g., Asbestos sampling for doors in tank farm area).

Sample ID – Enter the unique sample ID number (e.g., DD06ASBDR-001D).

Date/Time Sampled – Enter the date and time that the sample was collected (e.g., 07/06/06 / 1245).

Project ID – Enter the Project ID for the sample (e.g., DD06-ASBDR).

Sampler – Enter the initials of the person who collected the sample.

Station – Enter the identifying location/station number (e.g., AHV14, MW389, WASTE, etc.).

Laboratory – Enter the Laboratory that will analyze the sample (e.g., PGDP, PORTS, PARAGON, etc)

Lab COC No. – Enter the Lab COC No. (e.g., DD06-ASBDR).

Turnaround – Enter the turn around time for the sample analysis (e.g., 14 days, 28 days, etc.).

Analysis Requested – Enter the analysis paragroup ID for the analysis that the lab will perform (e.g., DD-ASBESTOS, NEW-TC-99-PGDP, etc).

Matrix Code – Enter the matrix code for the material being sampled from the list below.

MATRIX CODE	DESCRIPTION
AIR	Air
FILTER	Filter
GAS	Identifiable non-air gas, or unidentifiable gas
LIQUID	Identifiable non-water liquid, or unidentifiable liquid
OIL	Oil
SD	Sediment
SLUDGE	Sludge
SOIL	Soil
SOLID	Identifiable non-soil solid, or unidentifiable solid
TISSUE	Tissue
WATER	Water (QC)
WG	Groundwater

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EXAMPLE OF A BLANK CHAIN OF CUSTODY FORM
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MATRIX CODE	DESCRIPTION
WIPE	Wipe
WS	Surface Water
WW	Waste Water

Bottle Type – Enter the type of bottle that will be used for the sample (e.g., wide mouth glass).

Bottle Size – Enter the size of bottle that will be used for the sample (e.g., 2 ounce).

No. of Bottles – Enter the number of bottle that will be collected (e.g., 3).

SOW No. - Enter the SOW number for the sample (e.g., DD06-39).

Preservatives – Enter they type of preservative used for the sample (e.g., None, HCL pH<2, 4°C, etc).

Sample Type – Enter the sample type for the sample from the list below.

SAMPLE TYPE	DESCRIPTION
FB	Field Blank - a sample that is prepared in the field to evaluate the potential for contamination of a sample by site contaminants from a source not associated with the sample collected.
FR	Field Duplicate - two or more samples collected at the same sampling location either side by side or one immediately following the other.
FTB	Filter Blank - analyte-free water passed through a filter and collected in a sample container.
REG	Regular - primary sample collected for analysis.
RB	Refrigerator Blank - analyte-free water that is used to detect any cross contamination of samples stored in the laboratory refrigerator.
RI	QC Equipment Rinsate/Decontamination - a sample collected using analyte-free water which has been run over/through sample collection equipment used to determine if contaminants have been introduced by contact of the sample medium with sampling equipment.
TB	Trip Blank - a sample which is prepared prior to the sampling event and is stored with the investigative samples throughout the sampling event used to determine if samples were contaminated during storage and/or transportation to the laboratory.

Miscellaneous – Enter any other important information or comments regarding the sample.

Attachment C
EXAMPLE OF A CHAIN-OF-CUSTODY GENERATED FROM PEMS
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Sample Chain of Custody Record

NW Tc-99/TCE - 30-Day TAT - EQ & Well Vaults
Sample ID HV082EW1-0606
Date/Time Sampled _____
Project ID NWOPS06-11 **Sampler:** _____
Station HV082
LAB COC NO.: NWOPS06-11 PGDP

Planned Sampling Date: 8/1/2006

NEW-YOA-PGD Matrix: WG

Bottle: 40 ml YOA	Pres: HCL pH<2, 4C	2 ml	Volatiles Organics
Bottle: 40 ml YOA	Pres: HCL pH<2, 4C	2 ml	Volatiles Organics
Bottle: 40 ml YOA	Pres: HCL pH<2, 4C	2 ml	Volatiles Organics

SOW Numbers: NWOPS06-02 NA
8260 Trichloroethene

NEW-TC-99-PGD Matrix: WG

Bottle: 1000 ml plastic
Pres: HNO3 pH<2 2 ml

SOW Numbers: NWOPS06-02 NA
RL-7100 Technellum-99

Miscellaneous: _____

Chain of Custody

Sample Relinquished By _____	Date/Time _____
Received By _____	Date/Time _____
Sample Relinquished By _____	Date/Time _____
Received By _____	Date/Time _____
Sample Relinquished By _____	Date/Time _____
Received By _____	Date/Time _____
COC Relinquished By _____	Date/Time _____
Received By _____	Date/Time _____

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Attachment D
EXAMPLE OF A BLANK LABEL AND CUSTODY SEAL
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Blank Label – These labels may be printed onto sticker paper or shrunk and copied onto sticker paper for use as needed.

Project ID: _____
Sample ID: _____
Lab COC No.: _____
Matrix Code: _____ Sampler: _____
Location ID: _____ Lab: _____
Analysis Requested: _____
Date/Time Sampled: _____
Bottle Type: _____ Bottle Size: _____
Preserv. _____ NCS Exempt <input type="checkbox"/> PF <input type="checkbox"/>

Project ID: _____
Sample ID: _____
Lab COC No.: _____
Matrix Code: _____ Sampler: _____
Location ID: _____ Lab: _____
Analysis Requested: _____
Date/Time Sampled: _____
Bottle Type: _____ Bottle Size: _____
Preserv. _____ NCS Exempt <input type="checkbox"/> PF <input type="checkbox"/>

Project ID: _____
Sample ID: _____
Lab COC No.: _____
Matrix Code: _____ Sampler: _____
Location ID: _____ Lab: _____
Analysis Requested: _____
Date/Time Sampled: _____
Bottle Type: _____ Bottle Size: _____
Preserv. _____ NCS Exempt <input type="checkbox"/> PF <input type="checkbox"/>

Project ID: _____
Sample ID: _____
Lab COC No.: _____
Matrix Code: _____ Sampler: _____
Location ID: _____ Lab: _____
Analysis Requested: _____
Date/Time Sampled: _____
Bottle Type: _____ Bottle Size: _____
Preserv. _____ NCS Exempt <input type="checkbox"/> PF <input type="checkbox"/>

Custody Seal - These seals may be copied or printed onto sticker paper for use if needed. Other similar custody seals also are acceptable.

	CUSTODY SEAL

	CUSTODY SEAL

	CUSTODY SEAL

	CUSTODY SEAL