

CLARIFICATION NUMBER CAO-00-025, REV. 3
SAMPLE TRACKING, CUSTODY, AND PRESERVATION

ISSUE

1. What are the permit's requirements for canister tags? B-4a(3), B1-1c, B1-1c(1), B1-4, and B3-10a(2)
2. What do the sample preservation requirements in Table B1-4 mean relative to the use of SW-846? Table B1-4

CONCLUSION

1. The permit refers to sample tags and canister tags, often synonymously. The permit discusses canister and/or sample tags in two contexts. First, B1-1c(1) requires the laboratory responsible for canister cleaning and certification to maintain canister certification documentation and *initiate* the canister tags. There is little in the permit regarding what this initiation entails. The CBFO interprets that this *initiation* is the laboratory responsible for cleaning and documenting the traceability of a canister to a specific equipment cleaning batch. Second, B1-4 refers to sample tags, completed by the sampler, which must contain the following information:

- Sample ID number
- Sampler initials and organization
- Ambient temperature and pressure (for gas samples only)
- Sample description
- Requested analyses
- Data and time of collection
- QC designation (if applicable)

Canister tags and sample tags may be combined into a single tag. If laboratories use separate canister and sample tags, however, traceability between sample tags and relevant canister and sample information must be maintained.

The laboratory is responsible for removing the sample tag from the canister and retaining it in the project files. Originals or copies of the gas sample tags are also to be included in batch data reports [B3-10a(2)].

2. The sample preservation requirements in Table B1-4 specify the use of SW-846. These shall be specified as follows:
 - a. The requirement to cool to 4°C is consistent with SW-846.

- b. "Cool to 4°C" will mean that the samples will be placed in an insulated container and packed with frozen chemical ice. Sufficient ice will be used to ensure the samples remain cool until analyzed or stored in a refrigerated unit. Sites will not be required to produce temperature records for the samples if they document that the ice is still cool when the sample is unpacked.
- c. If a refrigerator is used for interim storage of samples, the temperature in the refrigerator should be recorded periodically to assure adequate cooling. Site procedures should specify the use of refrigerators and recording temperatures.

The generally accepted practice for sample preservation is that shipments are considered adequately cooled if ice remains when the shipment is unpacked or if the temperature is measured to show that the criterion is met.