

CLARIFICATION NUMBER CAO-00-050, REV. 2
SAMPLE CONTAINERS

ISSUE

Are purchased sample containers that meet *EPA Specifications and Guidance for Contaminant-Free Sample Containers, 9240.0-5A* useable under the permit? B1-2b(3)

CONCLUSION

Yes. The practice of purchasing certified clean containers satisfies the Permit requirement. Sites are required to keep records of the certification of cleanliness for sampling equipment. Table B-7 of the Permit lists sampling equipment certifications as a required record that must be maintained in the project files.

DISCUSSION

Although the permit provides requirements for cleaning sample containers, it is appropriate for the generator sites to use *EPA Specifications and Guidance for Contaminant-Free Sample Containers, 9240.0-5A*. SW-846, Section 9.2.2.4 states:

The choice of sampling equipment and sample containers will depend upon the previously described waste and site considerations. For the following reasons, the analytical chemist will play an important role in the selection of sampling equipment: ~~consistent with the requirements of the permit:~~

1. The analytical chemist is aware of the potential interactions between sampling equipment or container material with analytes of interest. As a result, he/she can suggest a material that minimizes losses by adsorption, volatilization, or contamination caused by leaching from containers or sampling devices.
2. The analytical chemist can specify cleaning procedures for sampling devices and containers that minimize sample contamination and cross contamination between consecutive samples.
3. The analytical chemist's awareness of analyte-specific properties is useful in selecting the optimum equipment (e.g., choice of sampling devices that minimize agitation for those samples that will be subjected to analysis for volatile compounds).