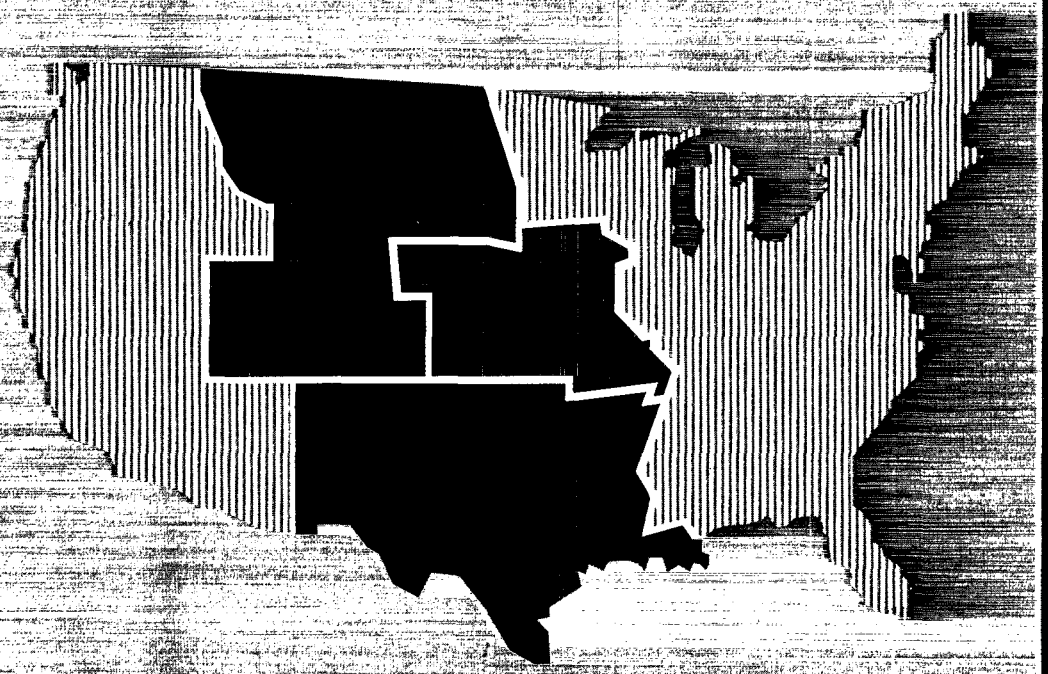
ARCS

Remedial Activities at Uncontrolled Hazardous Waste Sites in the Zone of Regions VI, VII, VIII

Contract No. 68-W8-0112

United States
Environmental Protection Agency



CH2M HILL

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Field Sampling Plan
RSR Corporation Superfund Site
Operable Unit No. 2

ARCS Contract No. 68-W8-0112
EPA Work Assignment No. 68-6P2H
CH2M HILL Master Project No. TXE68117

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Prepared for

U.S. Environmental Protection Agency

Prepared by

CH2M HILL

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List of Abbreviations

AOC	Administrative Order on Consent
CLP	Contract Laboratory Procedure
DHA	Dallas Housing Authority
EPA	(U.S.) Environmental Protection Agency
FS	Feasibility Study
FSP	Field Sampling Plan
GLP	George Loving Place
JN	Jones & Neuse, Inc.
MS/MSD	Matrix Spike/Matrix Spike Duplicate
NPL	National Priorities List
OU	Operable Unit
QA	Quality Assurance
QAPP	Quality Assurance Project Plan
QC	Quality Control
RA	Remedial Action
RAS	Routine Analytical Services
RI	Remedial Investigation
RRS	Rust Remedial Services, Inc.
SMO	Sample Management Office
TCLP	Toxicity Characteristics Leaching Procedure
TNRCC	Texas Natural Resource Conservation Commission (formerly TWC)
TWC	Texas Water Commission (now TNRCC)

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Section 1

Field Sampling Plan Overview

1.1 Introduction

This Field Sampling Plan (FSP) was prepared for the United States Environmental Protection Agency (EPA), Region VI, in response to Work Assignment No. 68-6P2H under Contract No. 68-W8-0112 for the Dallas Housing Authority (DHA) at Operable Unit (OU) No. 2 of the RSR Corporation Superfund Site located in Dallas, Texas. The Oversight Plan covers oversight activities associated with the implementation of the final Administrative Order on Consent (AOC) between EPA and DHA. The remedial investigation/feasibility study (RI/FS) and Remedial Action (RA) activities at locations under DHA's jurisdiction are documented in the AOC. Field activities associated with OU No. 2 are described in the RI Work Plan for DHA's West Dallas Development and in the Demolition and Removal Action Plan Work Plan for DHA. The field activities to be conducted are as described in the AOC and in the final work plans and the sampling and analysis plan (SAP).

1.2 Background

The RSR Corporation Superfund Site is located in a primarily residential/light industrial section of west Dallas, just south of the Trinity River. From 1934 until 1971, a lead smelting facility located near the approximate center of the site was operated by Murph Metals, Inc., and its predecessors. In 1971, RSR Corporation acquired the lead smelting operation and established Murph Metals as an operating subsidiary. The facility continued to operate under RSR Corporation until March 1984, when it was purchased by the current

owner, Murmur Corporation. The Murmur Corporation facility consists of the smelter facility and a manufacturing and fabricating producing facility producing lead shot and foil.

As a result of a lawsuit brought by the City of Dallas and the Texas Air Control Board against RSR Corporation in 1983, the company was required to take corrective measures at the facility, which included installation of stack emission controls. RSR Corporation was also required to fund a cleanup of the residential community within 1/2-mile of the smelter. The cleanup, conducted in 1984 through 1985, required the removal of soils in the residential areas where analytical results indicated lead concentrations greater than 1,000 ppm, which was believed to be an appropriate removal level at that time. The soils were removed to a depth of 6 inches, replaced with clean fill, and covered by sod. Soils from public play areas, day care centers, and residential gardens were removed to a depth of 12 inches and replaced with washed sand or clean soil.

Also in 1983, the City of Dallas declined to renew the operating permit for the smelter. This decision was based on the facility's historical operational practices and City zoning ordinance restrictions. As a result, the smelter facility closed in 1984.

Concerns about lead contamination in the west Dallas area reemerged in 1991 when the Texas Water Commission (TWC, now the Texas Natural Resource Conservation Commission, or TNRCC) began receiving complaints from area residents about slag piles and battery ships allegedly originating from the former RSR Corporation facility. A sampling study was conducted and the results indicated many properties in the area were contaminated. Subsequently, TNRCC and EPA agreed to conduct activities necessary to identify contaminated properties in the area, and to remediate where necessary.

Soil sampling conducted by EPA in 1991 verified the presence of soil led contamination greater than 500 ppm in residential areas surrounding the smelter facility, and the use of battery chips and slag as fill materials. As a result, EPA initiated a removal action in the

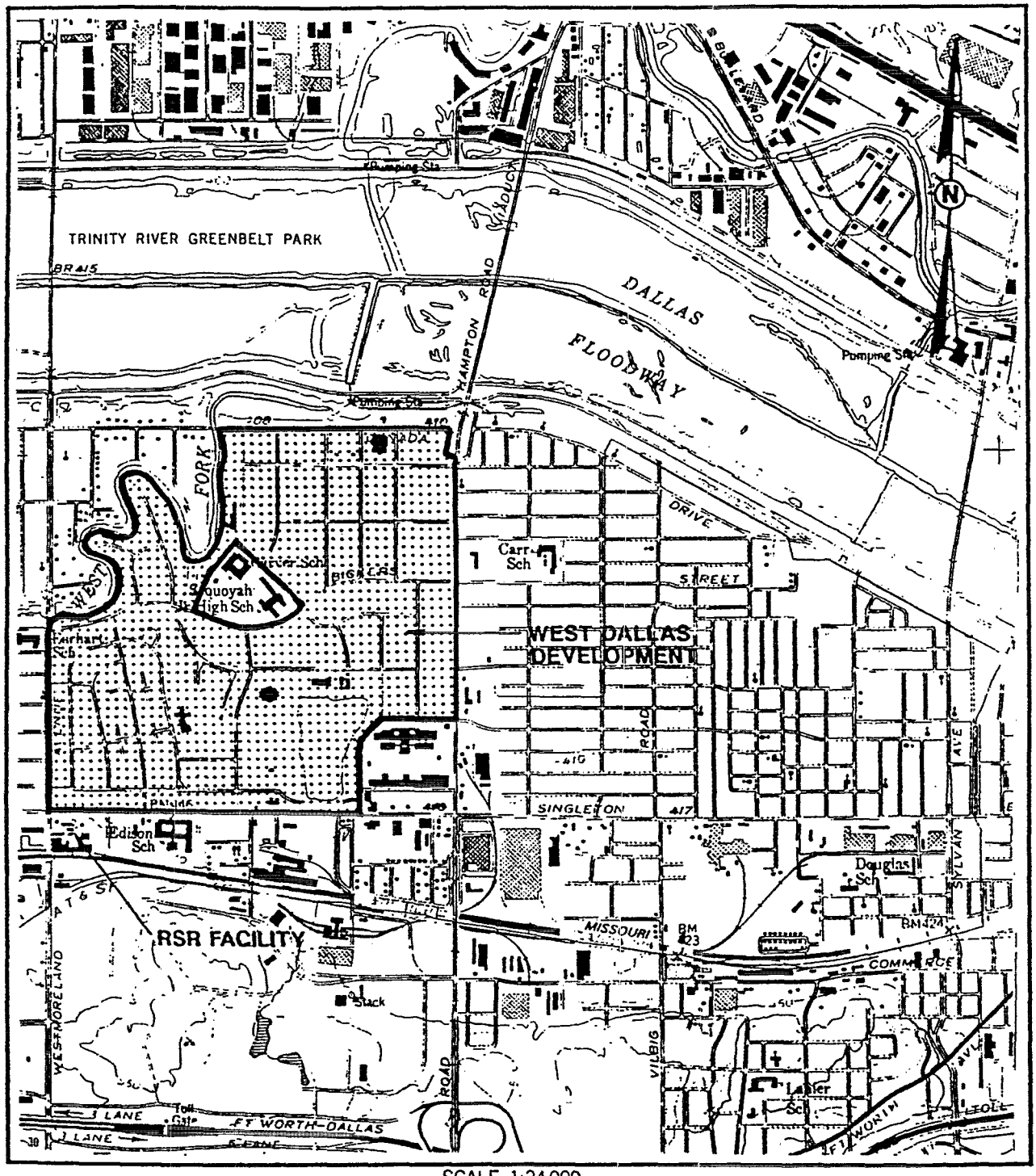
residential area adjacent to the smelter. Cleanup levels for this removal action were 500 ppm lead, 20 ppm arsenic, and 30 ppm cadmium. In addition, the TWC initiated a door-to-door residential survey and sampling investigation in 1992 to ascertain the location of areas where battery chips and slag were used as fill and to determine soil contamination levels in those areas. The TWC investigation and EPA removal action are completed, with the final reports now available.

On May 10, 1993, the EPA announced the proposal of the RSR Corporation Site to the National Priorities List (NPL) of Superfund sites. The site received a score of 50.0 based on the soil exposure pathway. Fallout from historical air emissions resulted in contamination of properties near the site. In addition, the use of battery chips and slag as residential fill materials is believed to be a significant route of exposure to the residential population in the area.

The RSR Corporation Superfund Site is currently divided into five operable units. The boundaries of the OU No. 2 are presented in Figures 1-1 and 1-2. This FSP covers activities associated with OU No. 2, which includes single and multi-family public housing developments completed in 1958. The property is presently under the jurisdiction of the DHA; it is bounded by Westmoreland Road to the west, Hampton Road to the east, Canada Drive to the north, and Singleton Boulevard to the south.

1.3 Scheduling

The proposed schedule for monitoring and sampling activities is shown in Table 1. The schedule is contingent upon weather, and the work of DHA's contractor (Rust Remedial Services, Inc., or RRS) and consultant (Jones and Neuse, Inc., or JN). RRS will be removing contaminated soil, and JN will be collecting verification samples from which CH2M HILL will take splits. A revised schedule is expected by August 1994.



SCALE 1:24 000

1 ½ 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929

DEMOLITION & REMOVAL ACTION WORKPLAN

SITE TOPOGRAPHY MAP

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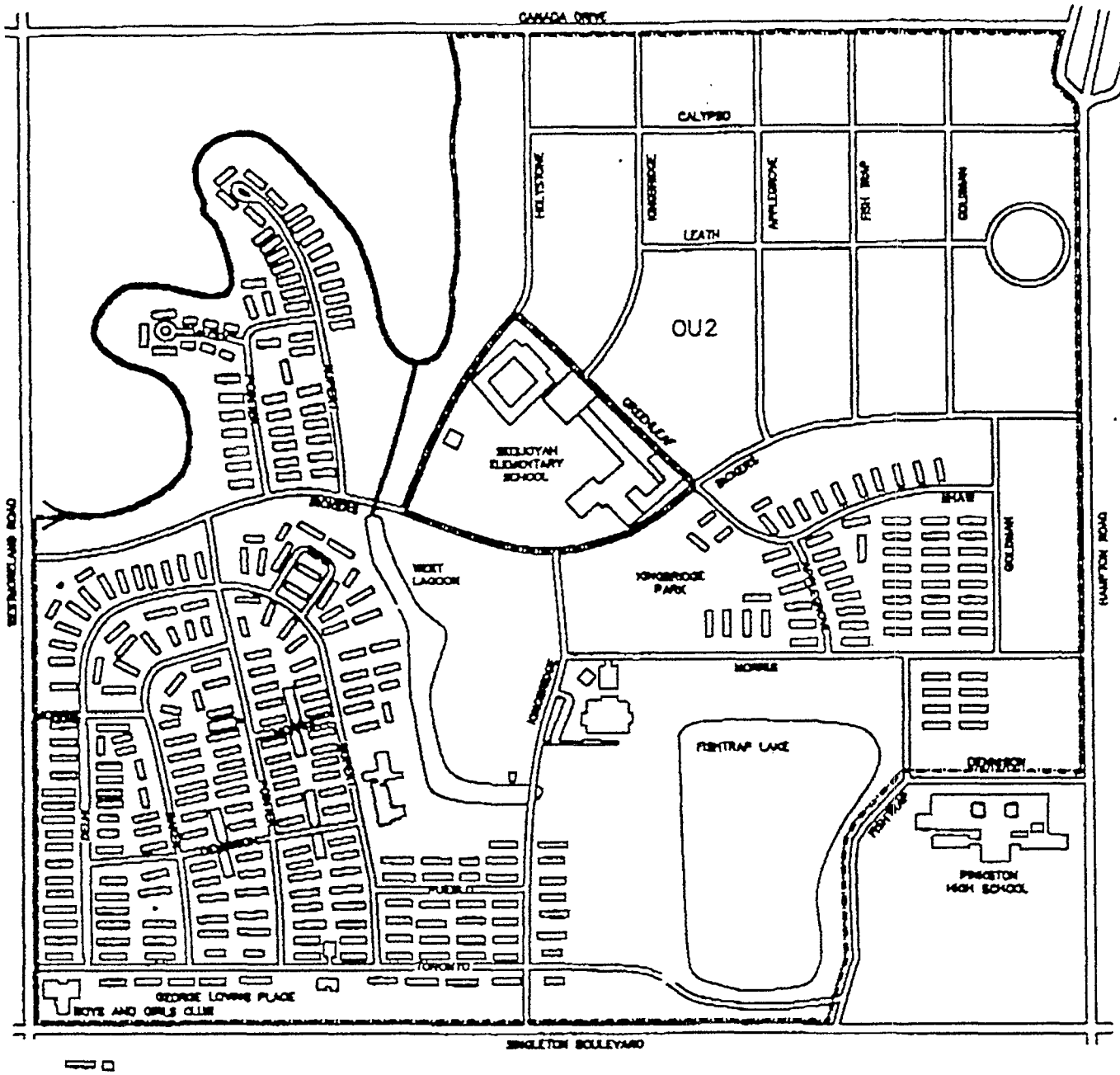
DALLAS HOUSING AUTHORITY
DALLAS, TEXAS

Figure 1-1

CDM
environmental engineers, scientists
planners, & management consultants



RSR SMELTER

NORTH

1" = 800'

0 400 800

BASE MAP
DALLAS HOUSING AUTHORITY
DALLAS, TEXAS

JONES AND NEUSE, INC.
Environmental and Engineering Services

Figure 1-2

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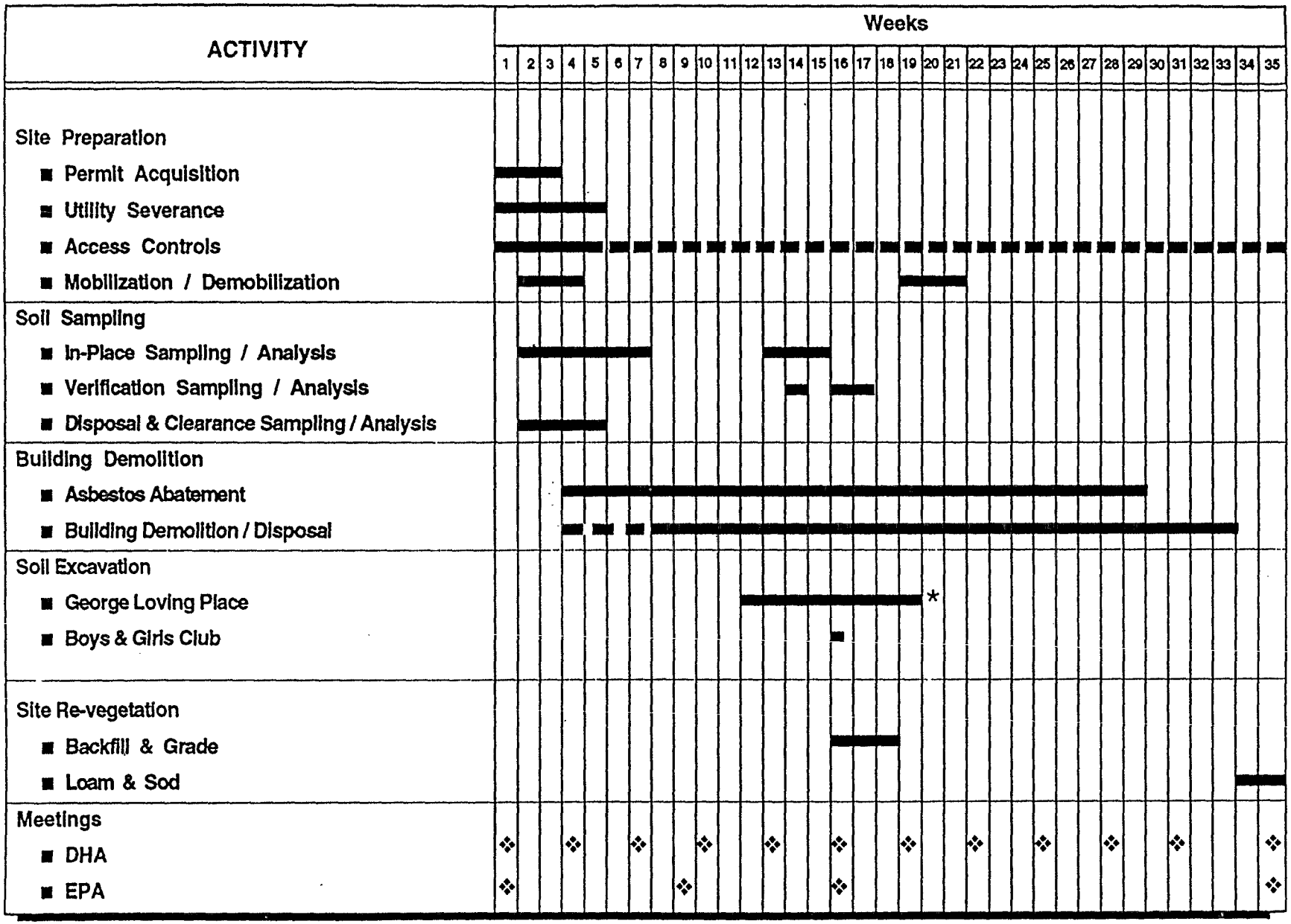

* *Additional soil excavation based on verification sampling / analysis.*

Table 1
Removal Action Schedule
Dallas Housing Authority

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1.4 Sample Splits

The EPA will collect a number of sample splits. Sample splits are collected from those locations deemed to be especially significant with respect to a correct interpretation of contaminant extent. Sample splits are being collected to provide a quality control check on the quality of analytical work being performed by DHA and JN.

Inorganic analyses requested for soil sample splits will be Contract Laboratory Program (CLP) routine analytical services (RAS). Appropriate lead time is necessary to coordinate sample shipments and laboratories through the Sample Management Office (SMO). Field oversight personnel should determine anticipated sampling dates for the sampling locations listed above as soon as possible and inform the oversight task manager. The task manager will coordinate sample collection with the SMO and ensure that all necessary supplies and paperwork are at the field site.

The split samples will be collected by JN and handed over to CH2M HILL oversight personnel. Sample preparation, documentation, packaging, and shipping shall be conducted in accordance with the procedures described in EPA's Sampler's Guide to the CLP (1990) and the EPA's User's Guide to the CLP (1988).

1.5 Overview of Field Oversight Plan

The July 30, 1993, EPA Field Oversight Plan presents general procedures for providing oversight of field work associated with the RI/FS and RA for the RSR Corporation Superfund Site, OU No. 2 (DHA Property). This FSP presents information and specific instructions for oversight personnel related to field sampling activities to be performed by JN.

The following items are general procedures for field oversight of sampling activities. Specific items are found in Section 2. It will not be possible to observe, on a daily basis, all of the items listed below. Oversight personnel should concentrate on a major category of items (e.g., cross-contamination potential, paperwork, etc.) on a daily basis. Relisting each item in the oversight logbook for each site sampled is not necessary. Rather, oversight personnel should observe events, note that the checklisted items were evaluated and document any specific discrepancies observed.

The general procedures for oversight of sampling activities are as follows:

- Note the appropriate field planning documents pertinent to the activity being observed and note any amendments made to the sampling plan to reflect changes in sampling/safety procedures.

- Observe and note whether or not a representative set of field measurements (such as, pH, temperature, and conductivity) are being taken as specified in the sampling plan. Observe whether or not a representative set of initial calibrations have been made and the general frequency of calibration checks.

- Observe the documentation of field measurements.

- Sample Collection.

  - Observe the types of containers versus those specified in the sampling plan.

  - Observe that the sample is properly transferred from the sampling device to the sampling container.

- Observe that samples are preserved as specified in the sampling plan.

- Observe that the number and types of samples collected are as specified in the sampling plan.

- Document sample splits that are collected.

- Observe that field blanks are being collected.

- Observe that rinseate samples are being collected.

• Sample collection paperwork.

- Observe 3 days worth of sample paperwork.

- Observe that logbook entries match sample paperwork entries.

- Observe that chain-of-custody records are filled out according to the DHA/JN Field Operations Plan.

- Observe that sample tags are correctly filled out.

- Observe that the appropriate paperwork accompanies the samples in the coolers.

- Cross-contamination potential.

  - Observe that samples are collected in order, beginning with the least likely contaminated area and proceeding to the most likely contaminated area or site.

  - Observe that surgical gloves are changed often (at a minimum changed at each sampling location).

  - Observe that proper decontamination procedures for equipment and personnel are followed, as specified in the sampling plan.

  - Observe that contaminated materials are properly handled and disposed, as specified in the Plan.

  - Observe that sampling equipment is properly protected from contamination when not in use, and when transported between sites.

Section 2

Specific Procedures for Sample Splits During the Removal Action

This section of the FSP presents objectives and methods to be used for split sampling during on-site activities, which include soil excavation and disposal.

2.1 Sample Splits

Item 41 of the AOC allows EPA to receive split samples at any time upon request. It is anticipated that EPA will choose to collect sample splits at various times during fieldwork under this Removal Action. EPA and CH2M HILL will concur on locations for splits. After EPA approves these locations, CH2M HILL will inform DHA in advance of specific split samples to be collected. Details on the number of splits, the parameters to be analyzed, and the analytical procedures to be employed are described in the following paragraphs.

2.1.1 Sample Splits for Soil Excavation and Disposal

The soil excavation and disposal consists of removing the soils with concentrations above the action levels for lead, arsenic, or cadmium and its disposal. The concentrations of lead, arsenic, and cadmium in soils at George Loving Place (GLP) were determined from a previous sampling event. Soils in this area were sampled on a 50 foot by 50 foot grid system which was surveyed over the entire area. Areas where analytical results indicate soil concentrations exceeding 500 mg/Kg lead, 20 mg/Kg arsenic, and/or 30 mg/Kg cadmium will be excavated to a minimum depth of 6 inches below land surface.

All of the blocks requiring excavation will undergo verification sampling following excavation to confirm that any residual concentrations are below the removal action limits listed above. Oversight personnel will collect split samples during the verification sampling

at a frequency of 10 percent. Ten percent of the split samples collected will also be used for QA/QC purposes and for analyses of lead, arsenic, and cadmium using the Toxicity Characteristics Leaching Procedure (TCLP).

Appropriate lead time (approximately 4 weeks) is required to coordinate sample collections with the EPA SMO. Oversight personnel will coordinate upcoming sampling schedules with the DHA contractor and inform the SMO of estimated soil sample collection dates.

2.2 Procedures for Splitting Samples

CH2M HILL oversight personnel will:

- Describe and sketch the sample location in a field log book.
- Photograph the sample location.
- Put on a clean pair of gloves and hand the appropriate sample container(s) to the JN sampling personnel to collect the split sample.
- Observe sampling techniques for cross-contamination, composite uniformity, handling of sample during sampling, and decontamination procedures following sample collection.
- Receive sample back from JN personnel with lid/cap in place, with date, time, and location noted.

For each sample, the following will subsequently be conducted:

- Documentation - In field log book with photo number.

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- Labels - CLP number label and generic container label (including sampler initials, date, time, location, and preservatives) will be placed onto the side of each sample container.

- Tape - Following labelling, clear tape will be placed over labels on the container(s).

- Tags - When filled out properly, a CLP sample tag includes sampler signature, analysis requested, preservatives, date, time, project code, location, case number, bottle lot number, CLP number, and traffic report number. The tag will be tied securely around the lid/cap of each sample container. An example of a completed CLP sample tag is included in Appendix A.

- Custody Seal on Sample Container - The custody seal will be signed, dated, and placed around the lid/cap, over the strings of the CLP tag. An example of a completed custody seal is included in Appendix A.

- Traffic Report - The chain-of-custody/traffic report form will be completely filled out, with all sample and QA/QC information listed correctly, and signed by the sampler(s). An example of a completed traffic report for inorganics analysis is included in Appendix A.

- Packaging - Samples will be sealed in plastic bags and placed in a waterproof ice chest packed in absorbent packing material with ice (double-bagged), if required. The chain-of-custody traffic report form and a return airbill will be sealed in a plastic bag taped to the inside of the lid. Signed and dated custody seals will be placed on three sides of the chest after it is closed. Overnight shipment of sample coolers to the assigned CLP laboratory(s) will be conducted in accordance with all state and federal regulations regarding hazardous environmental sample packaging and shipment.

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All CLP sample handling, packing, shipping, and documentation procedures will follow instructions from the EPA's Samplers Guide to the CLP (1990) and the EPA's User's Guide to the CLP (1988).

2.3 QA/QC Samples

Quality Assurance and Quality Control (QA/QC) samples will be taken at an approximate frequency of 10 percent. This will include a duplicate, equipment blank, and matrix spike/matrix spike duplicate (MS/MSD).

The purpose of a duplicate is to check laboratory and field procedures. Duplicates will be assigned separate numbers and be submitted blind to the lab.

The purpose of an equipment blank is to check decontamination procedures. These will be collected from liquid media with deionized or distilled water. The water will be used to rinse decontaminated equipment and pour the water into sample containers. Equipment blanks will be assigned a separate sample number.

MS/MSD consists of triple volume for organics and double volume for inorganics. These are submitted to the laboratory for laboratory Quality Control.

QA/QC sampling activities are discussed further in the Quality Assurance Project Plan (QAPP) which has been prepared under separate cover.

References

Camp Dresser & McKee. *Remedial Investigation/Feasibility Study Workplan for Dallas Housing Authority, Operable Unit 02.* January 1994.

Camp Dresser & McKee. *Demolition and Removal Action Workplan for Dallas Housing Authority, Operable Unit 02.* January 1994.

CH2M HILL. *Oversight Plan for Dallas Housing Authority, Operable Unit No. 2.* ARCS Contract No. 68-W8-0112. EPA Work Assignment No. 68-6P2H. July 30, 1993.

United States Environmental Protection Agency. *Administrative Order on Consent.* CERCLA Docket No. 6-21-93.

United States Environmental Protection Agency. *Sampler's Guide to the Contract Laboratory Program.* Office of Emergency and Remedial Response. Washington, D.C. 1990.

United States Environmental Protection Agency. *User's Guide to the Contract Laboratory Program.* Office of Emergency and Remedial Response. Washington, D.C. December 1988.

Appendix A

Examples of Sample Tag, Custody Seal, and Traffic Report Form

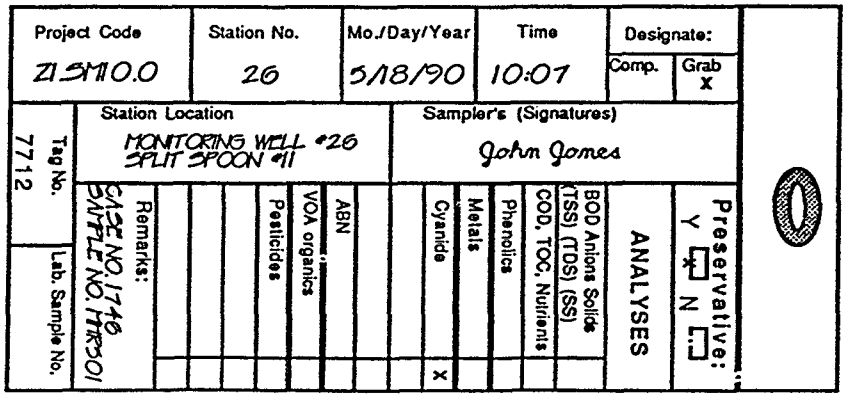
F. Sample Tag

The sample tag identifies each sample removed from a hazardous waste site and transferred to a laboratory for analysis. Place a sample tag on each sample container. Check with your RSCC to obtain sample tags as sample tags differ between Regions.

SAMPLE TAG INSTRUCTIONS

BOX 1	Under the "Remarks" heading, enter the CLP Case and/or SAS Number and record the CLP sample number.
BOX 2	Record the Project Code assigned by EPA.
BOX 3	Enter the Station Number assigned by the sampling team coordinator.
BOX 4	Record the date to indicate the month, day, and year of sample collection.
BOX 5	Enter the military time of sample collection, i.e., 13:01 = 1:01 p.m.
BOX 6	Place a check to indicate composite or grab sample.
BOX 7	Record the station location (description) as specified in the project plan.
BOX 8	Sign the sample tag with your name.
BOX 9	Place a check next to "yes" or "no" to indicate if a preservative was added.
BOX 10	Under "analyses," place a check next to the parameters for which the sample is to be analyzed. Note: Do not write in the box for "laboratory sample number."

Figure 19. Sample Tag



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H. Custody Seal

For potential litigation purposes, you must sign and date the custody seal. The custody seal is used to seal the lids on sample containers before placement into the cooler. Custody seals are also placed across the cooler opening after the cooler has been properly secured. Note: the space for "sample no." does not need to be filled out on custody seals placed across the cooler opening. An example of a signed custody seal is shown below.

Figure 21. Custody Seal

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY OFFICIAL SAMPLE SEAL	SAMPLE NO. MTR 501	DATE 3/18/90	SEAL BROKEN BY	DATE
	SIGNATURE John Jones			
	PRINT NAME AND TITLE JOHN JONES TECHNICIAN			

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TRAFFIC REPORT FORM INSTRUCTIONS

BOX 1 — Record the SAS number for RAS plus SAS samples that has been assigned to the project.

BOX 2 — Record the Case number that has been assigned to the sampling event.

BOX 3 — Transcribe the project code and account code assigned to the project by the RSCC. If sampling is not under Superfund, write the name of the program in the space provided, e.g., RCRA. Record the site name, city, state, and Site Spill ID (assigned by your Region).

BOX 4 — Record your Region number and the name of your sampling company. Print your name and write your signature in the space following.

BOX 5 — If sampling is under Superfund, place a check in the box that describes the task of the sampling mission.

ENF	-	Enforcement
ER	-	Emergency Response (Removal)
LSI	-	Listing Site Investigation
NPLD	-	National Priorities List Delete
PA	-	Preliminary Assessment
RA	-	Remedial Action
RD	-	Remedial Design
STSI	-	State Lead Site Investigation
O + M	-	Operations and Maintenance
RIFS	-	Remedial Investigation Feasibility Study
SSI	-	Screening Site Investigation
ST	-	State Lead
STPA	-	State Lead Assessment
Other	-	Please Specify

BOX 6 — Record the date shipped, the carrier name (e.g., Federal Express, Purolator, Emery, or Airborne) and the airbill number.

BOX 7 — Record the name and full address of the contract laboratory. Enter the name of the sample custodian or CLP contact.

BOX 8 — Carefully transcribe the CLP sample number from the preprinted sample labels.

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BOX 9	Record the appropriate sample description code from the choices listed in number 7 on the form.
BOX 10	Enter the estimated sample concentration level: "L" for low concentration, "M" for medium concentration, and "H" for high concentration.
BOX 11	Enter the sample type, composite or grab.
BOX 12	Record the type of preservative used (i.e., HCl, NaOH, HNO_3, H_2SO_4) from number 6 on the form.
BOX 13	Check the analytical fractions requested for each sample, for example, VOAs, SVs, and pesticides/Aroclors are for organics, total metals, and cyanide are for inorganics. Note: Either total or dissolved metals can be requested for each individual inorganic sample, but not both analyses.
BOX 14	Transcribe the Regional-specific tracking number or tag number designated by the RSCC.
BOX 15	Enter the station location number.
BOX 16	Record the month, day, year, and time, in military style (e.g., 1600 hours = 4:00 p.m.), of sample collection.
BOX 17	Enter your initials.
BOX 18	Enter the corresponding organic or inorganic CLP sample number, if applicable.
BOX 19	Place a Y or N to indicate if the TR is the final for a complete Case.
BOX 20	Sign and date the completed form. Record the time the form was completed.

After you have properly completed the TR, send the pink copy to SMO, and enclose the white and yellow copies with the sample for receipt at the laboratory. Send the blue (for organic TR) and the green copy (for inorganic TR) to your RSCC.

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Figure 18. Inorganic Traffic Report

EPA — United States Environmental Protection Agency
Contract Laboratory Program Sample Management Office
PO Box 818 Alexandria, VA 22313
703-557-2490 FTS 557-2490

Inorganic Traffic Report
(For Inorganic CLP Analysis)

SAS No. (if applicable) 1

Case No. 2 10,000

1. Project Code: 21510.0
Account Code: 41502
2. Region No.: 1
Sampling Co.: ACE
4. Date Shipped: 8-9-90
Carrier: FEDX

Regional Information: 3
Sampler (Name): JOHN SMITH 4
Airbill Number: 321-687-1234 6

Non-Superfund Program
Sampler Signature: John Smith
5. Ship To: 7
LAB A
100 APRIL WAY
BOSTON, MASS
02104
ATTENTION SAMPLE CUSTODIAN

Site Name: CHEER'S DUMP
3. Type of Activity: 5
ENF ☐ ER ☐ LSI ☐ NPLD ☐
PA ☐ RA ☐ RD ☐ STSI ☐
O&M ☐ RIFS ☐ SSI ☒ ST ☐ STPA ☐ Other ☐

City, State: BOSTON, MA
Site Spill ID: ZZ

6. Preservative (Enter in Column D)
1. HNO_3
2. NaOH
3. HCl
4. H_2SO_4
5. Ice only
6. Other (SAS) (Specify)
N. Not preserved

7. Sample Description (Enter in Column A)
1. Surface Water
2. Ground Water
3. Leachate
4. Rinsate
5. Soil/Sediment
6. Oil (SAS)
7. Waste (SAS)
8. Other (SAS) (Specify)

Double volume required for spike/duplicate analysis sample.

Ship medium and high concentration samples in paint cans.

See reverse for additional standard instructions.

For total or dissolved metals, check only one RAS analysis per each sample.

CLP Sample Numbers (from labels)	A Enter # from Box 7	B Conc. Low Med High	C Sample Type: Comp/ Grab	D Preservative from Box 6	E - RAS Analysis: Metals Total	Metals Dissolved	Cyanide	Low Conc. Nitrate/ Nitrite	Low Conc. Fluoride	High pH	High Conductivity	F Regional Specific Tracking Number or Tag Numbers	G Station Location Number	H Mo/Day/ Year/Time Sample Collection	I Sampler Initials	J Corresp. CLP Org. Samp. No.
MAA123	1	L	G	NAOH	X		X					A7712	MCL-GW-01	8-9-90 13:00	JS	AA123
MAA124	2	L	G	HNO3		X	X					A7713	MCL-GW-02	8-9-90 13:00	JS	AA124
MAA125	2	L	G		X		X					A7714	MCL-GW-03	8-9-90 13:00	JS	AA125
MAA126	2	L	G	HNO3		X	X					A7715	MCL-GW-03	8-9-90 13:00	JS	AA126
8	9	10	11	12			13					14	15	16	17	18

Shipment for Case complete? (Y/N) Y 19

CHAIN OF CUSTODY RECORD

Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
20 John Smith	8/9/90 14:00				
Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Received by: (Signature)	Date / Time	Received for Laboratory by: (Signature)	Date / Time	Remarks Is custody seal intact? Y/N/none	

Split Samples ☐ Accepted (Signature)
☐ Declined

DISTRIBUTION:
Green - Region Copy Pink - SMO Copy White - Lab Copy for Return to SMO Yellow - Lab Copy
EPA Form (10-90) Replaces EPA Form (9110-1), Which May Be Used