

OIL SAMPLE HANDLING & TRANSMITTAL GUIDE



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About MSL

The Marine Safety Laboratory (MSL) is a Headquarters Unit under the Office of Investigations and Analysis (CG-INV-1) and is the Coast Guard's sole forensic laboratory for oil pollution investigations. Samples collected by field units are submitted to MSL to determine if a relationship exists between the spilled oil sample(s) and the suspected source sample(s). Samples may also be analyzed to determine the path of discharge during the alleged bypass of oil filtration equipment and to identify an unknown petroleum product in the environment. Note: MSL does not analyze hazardous materials other than petroleum oil.

The Oil Identification System (OIS) was developed in the mid-1970's by the Coast Guard Research and Development Center (RDC). Its purpose is to identify the unique, intrinsic properties of petroleum oil that would allow for matching spilled oil to its source. The OIS draws upon three analytical techniques: gas chromatography (GC), gas chromatographymass spectrometry (GC-MS), and infrared spectroscopy (IR). Each of these techniques measures different chemical properties of oil and has been shown to produce results independent of the others. Because no single technique provides unequivocal results in all cases, the OIS employs a tiered, multi-method approach. Each method has been formalized into an ASTM-approved standard method.

MSL uses the OIS to characterize the unique chemical fingerprints of petroleum oil samples and to compare the samples to each other. An Oil Sample Analysis Report is prepared for each case. This report provides chemical evidence to affix oil pollution responsibility, assess penalties and recover federal pollution funds expended during a spill event.

Sampling Safety

All standard safety procedures found in the Marine Safety Manual apply to oil spill sampling. Protective nitrile gloves and appropriate eye protection should be worn during sample collection. It is best to obtain additional information prior to sampling if safety considerations are unknown or if hazardous chemicals other than petroleum oil may be present.

Sampling Equipment

MSL suggests the following equipment be included in a basic field sampling kit:

- 1 sampling kit carrier and/or cooler
- 16 clear glass 4 oz. sample jars with Teflon-lined lids
- 16 jar rings
- 5 McGill sheen net kits
- 10 4" x 4" 2 ply PTFE absorbent pads for swipe sampling
- 1 box nitrile gloves
- 1 roll cotton twine
- 1 roll electrical tape to seal jar lids and prevent leaking during transport
- 1 sampling extension pole
- 8 cardboard mailing tubes
- Adhesive labels
- Sorbent material
- Waterproof markers
- Evidence tape to place over jar lid seals during criminal investigation

This list should be modified by each unit in accordance with its routine sampling activities. A unit monitoring high vessel traffic or conducting frequent vessel inspections should maintain more supplies than a unit rarely responding to spill events.

Samples should be placed in a cooler during lengthy field investigations conducted in hot weather to preserve the samples until they can be placed into the sample refrigerator.

The sampler should don a clean pair of gloves prior to collecting each sample and gloves should be removed promptly after sample collection. Each sample jar should be sealed with electrical tape and clearly marked with identifying information before moving on to the next sample. MSL recommends the use of evidence tape in conjunction with electrical tape during criminal investigations. A small piece of evidence tape containing the sampler's initials and date of sample collection placed over the electrical tape provides proof the jar remained sealed during storage and transport.

Suggested sources of supply are provided in <u>Attachment 1</u>. MSL retains the cardboard shipping tubes received with incoming cases and will ship them to field units for reuse when requested.

Sampling Considerations

There are many factors to consider during the investigation and sampling that are important to the overall effectiveness of the Oil Identification System. One critical factor is weathering. Evaporation, dissolution, oxidation, and biodegradation are some of the weathering processes that alter petroleum fingerprints. A sample may not be useful for conclusive analysis if severe weathering has occurred. Rapid response to spills, proper sample storage, and prompt shipment of samples to MSL can greatly reduce the effects of weathering.

Contamination is another area of concern. Hazardous chemicals, sewage, and other substances in the environment may interfere with the petroleum fingerprint. A note should be made on the Letter of Request (LoR) if the Pollution Investigator suspects such contamination may be present so the analyst can account for it during analysis.

Choice of sampling supplies is important to reduce the introduction of non-petroleum contamination to the samples by the investigator. Oil samples should not be in contact with plastic. A $4" \times 4"$ PTFE pad should be used whenever feasible to collect swipe samples, as traditional sorbent material typically contaminates an oil sample. A suggested source of supply for these sampling pads is provided in <u>Attachment 1</u>.

Because of their configuration, bilges often have spaces where oil can become trapped. These spaces do not allow oil to mix thoroughly with the rest of the bilge, and therefore, oil in one space may have a different fingerprint than oil in another space. Homogeneity may also be a concern with large waste pits. Every effort should be made to sample multiple spaces and locations whenever non-homogenous sources are sampled.

Sample Designations

Each sample shall be designated in accordance with one of three categories: spill, source, or background.

Spill -

Spilled oil is subject to weathering. For this reason, spill samples should be collected first. At least three samples of the waterborne oil should be obtained from various locations (e.g. center, leading edge, trailing edge) to account for slight differences in the oil, and to determine if more than one spill is present. Sample where the oil appears to be heaviest.

The McGill sheen net is made of an oleophilic ("oil loving") material, which makes it an excellent resource for sampling light sheens. A sheen net almost always collects sufficient oil for analysis at MSL, whereas direct sampling of light sheens frequently does not. Sheen net samples are highly susceptible to biodegradation so it is important to ship them to MSL as soon as possible after collection. Decanting should be used whenever a sheen net is not available to maximize the amount of oil relative to water in the sample jar. A suggested source of supply for sheen nets is located in Attachment 1.

Source -

Suspected source samples include, but are not limited to, any facility or vessel that had opportunity to cause the spill. The Pollution Investigator should exercise discretion in formulating a sample taking strategy, and all possible sources should be investigated. All tanks and bilges from any suspected source should be sampled, since each space will have a unique fingerprint.

Background -

When possible, a clean water sample should be obtained for all spill cases. It acts as a baseline measurement for conditions that exist in the area prior to the spill. A clean background sample should be submitted for sorbent material if it is used for sample collection.

Each sample jar should be no more than ¾ full to reduce the possibility of leaking during transport and to facilitate sample preparation at MSL.

Sample Storage

Samples are subject to weathering even after they are collected so all samples should be sent to MSL as soon as possible for optimum results. Samples that cannot be sent to MSL just after collection should be stored in a cool, dark place to minimize any degradation of the samples due to sunlight, heat, or microbial activity. Coolers with cold packs may be used for temporary storage on-scene. Optimal conditions for storing oil samples at the unit are in an explosion-proof¹, lockable refrigerator maintained at 40–42 °F. **Do not** freeze the samples.

It is important to note that a flammable storage refrigerator may be used instead of an explosion-proof refrigerator if the conditions are appropriate. It is the unit's responsibility to consult applicable regulations² to determine whether the refrigerator in use for oil sample storage is compliant with safety standards.

¹ Excerpt from ASTM Standard D3325: Standard Practice for the Preservation of Waterborne Oil Samples:

5. Apparatus

5.3 Refrigerator, explosion proof at about 4 to 5 °C

²**29 CFR 1910.307, NFPA 45,** and **NFPA70** address electrical safety requirements in hazardous (classified) locations and storage of flammable/combustible liquids.

Labeling

Sample jar labels provide detailed information pertaining to each sample and are very important in tracking the sample throughout the case. At a minimum, labels should assign a unique identifier to every sample jar, and the sample descriptions should be thorough enough to eliminate any ambiguity regarding sampling location. MSL records the descriptions from the labels onto the Check-In Log, which is included in the final Oil Sample Analysis Report.

A template for sample jar labels is available on the MSL website. The template is formatted for 1.3" x 4" label dimensions (Avery style 5162) and can be printed directly on to pregummed sheets of blank labels. A suggested label format (not to scale) is provided below.

Sample Information Label					
Sample Number:	Date/Time:/				
□ SPILL	□ SOURCE □ BACKGROUND				
Description:					
Sampler:	Witness:				
Unit Name:					
MISLE Evidence Control Number (ECN):					

Make sure the sample jar is clean and dry prior to label application. Do not use the label to seal the jar, as important information may be lost when MSL opens the jar for processing. Position the label such that information is not covered over when jars are sealed with vinyl electrical tape for shipment. Cross-check the sample jar labels against the Chain of Custody document to ensure sample numbers, descriptions, and spill/source designations are consistent. It is critical that the person listed on the jar label as the sampler (or witness) be the first person to relinquish the samples on the Chain of Custody.

MSL does not require the use of Chain of Custody labels. These labels may be used at the discretion of the investigator if custody of the samples will be transferred out in the field prior to generation of the Chain of Custody document in the office. All information documented on a Chain of Custody label must be accurately transferred onto a Chain of Custody document, as the labels do not substitute for the actual document.

Activity / Case Numbers

All USCG cases sent to MSL shall have a MISLE Incident Investigation Activity number (IIA). The IIA provides a link between the case documentation and samples. The IIA shall be listed on the Letter of Request, Chain of Custody, and sample jar labels. If a case has a Federal Project number (FPN), the FPN shall also be provided on the Letter of Request but does not replace the IIA.

MSL cannot complete the sample analysis without electronic custody of the samples in MISLE. Each sample shall be "shipped" to "CG MSL" in the tracking section of the "Oil Sample Evidence" tab. The Oil Sample Analysis Report will be uploaded to MISLE as a Standard Evidence Item. An email containing a link to the report will be sent to the Point of Contact once the report is available.

Federal, State and local government agencies utilizing MSL's services shall provide an agency case number for tracking purposes. The Oil Sample Analysis Report will be provided as a PDF through email.

Chain of Custody (CoC)

The Chain of Custody (CoC) record is the most important document related to samples sent to MSL. The CoC is used to track custody of the samples from the time they are collected until the time they are destroyed. This record is considered a legal document and requires great attention to detail. The original CoC stays with the samples; accordingly, MSL will not accept a photocopy or scanned copy of the CoC.

A person is considered to have custody of the samples when that person physically controls access to the samples, thereby ensuring the samples cannot be tampered with. Custody remains intact when someone either has the samples on their person or when the samples are in a secured location, such as an evidence refrigerator with a lock. Discretion should be used when determining who has access to a secured storage location.

The number of transfers on a CoC should be kept to a minimum whenever possible. The person who collected a sample (or the witness) shall always be the first person listed on the CoC relinquishing that sample. The individuals relinquishing and receiving a sample are both required to sign the CoC to document the transfer. The date/time a sample is "relinquished" shall be exactly the same date/time the sample is "received" since the transfer of custody occurs at a single point in time. If unit policy states that the watch stander has custody of samples in storage in the evidence refrigerator, the CoC does not need to be signed each time the watch changes. Instead, the samples may be relinquished to the refrigerator.

It is very important that the information recorded onto the CoC be consistent with the sample jar labels so there is no confusion as to the identity of the samples. The Incident Investigation Activity number must be written on the CoC. The descriptions from the sample jar labels should be copied verbatim. Annotations to these descriptions can be made in brackets or parentheses. Sample numbers listed on the top of the CoC must correspond precisely to the sample numbers listed in the transfer section.

The person packaging the samples for shipment shall relinquish the samples to MSL on the CoC. This person's name shall be printed below their signature, and the date/time the box is sealed shall be provided. MSL will sign as receiving the samples once we open the box. Do not relinquish the samples to FedEx on the CoC! Since the box is sealed, FedEx is not officially taking custody of the samples. A small piece of evidence tape placed over the box closure may help prove the package was not tampered with during transport should the case go to court.

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Errors on the CoC may raise questions about the admissibility of the sample evidence in court. Therefore, it is important to verify all information on this document is correct prior to shipping samples to MSL. Cross-check the CoC against the sample jar labels. Verify the descriptions, spill/source designations, date/time of transfers, and sample numbers. Handwritten CoC documents are acceptable but should be clearly legible. Any errors shall be lined through and initialed by the person making the change in such a way that both the error and the correction are legible. Do not use correction fluid or tape.

MSL cannot close a file and release a report until all discrepancies on the CoC are resolved. If a signature is missing, MSL will return the document to the sender to obtain the required information. These processing delays are avoidable by thoroughly reviewing the paperwork prior to shipment.

A CoC template can be downloaded from the MSL website and is also provided in Attachment 2.

Letter of Request (LoR)

The second document to accompany the samples to the lab will be the Letter of Request (LoR) for Analysis. The LoR serves as the primary line of communication between the field units and MSL. The original letter shall be generated as a unit memorandum in accordance with the CG Correspondence Manual (COMDTINST M5216.4 series) and forwarded to MSL with the samples.

Information to include on the LoR:

- Signature of a unit representative with "By Direction" signing authority
- Number of samples being shipped to MSL for analysis
- Type of service required Regular, Priority or Rush (see next section for more information regarding MSL's response time)
- Enforcement type (civil or criminal) if the enforcement type is unknown at the time of sample submission or if a case has the potential to go criminal at a later time, designate the case as "criminal" on the LoR.
- Type of Analysis -
 - Comparison of samples spill samples compared to each other and to all suspected source samples; product type and weathering also addressed
 - Comparison of samples to previously run CG MSL case number newly submitted samples compared to samples already stored at MSL
 - o *ID only* samples analyzed to determine type of product present without comparison of samples
 - Prep only samples prepared and preserved for potential future analysis –
 MSL will dispose of the samples if the submitting unit later determines analysis is not required.
- Incident Investigation Activity number, CGIS case number, or non-USCG agency case number
- Federal Project Number (FPN), if applicable
- A unit point of contact (POC), including phone number and email address the POC will be contacted to resolve any discrepancies noted in the paperwork and will be notified when the Oil Sample Analysis Report is available.
- Additional case information the investigator would like to convey to MSL, such as possible contaminants, specific sample comparison requests, soil seepage, etc.

A template for the LoR is available on the MSL website. See Attachment 3.

Response Time

MSL completes each analysis as efficiently as possible while maintaining high-quality standards. The time required to process a case is directly related to the number of samples submitted. In addition to the time required for sample preparation and for a chemist to perform data analysis, it takes approximately 65 minutes per sample to acquire the analytical data. MSL will strive to meet the response time you require and have specified in the Letter of Request. It is important to note that most delays in processing result from improper or incomplete paperwork submitted with the case.

Routine or "Regular" sample analysis is completed within 3-5 business days after receipt of the case at MSL.

Some circumstances may call for expedited analysis. A request for "Priority" analysis is justified if a large expenditure has been made from the Oil Spill Liability Trust Fund or if a potential responsible party questions the extent of the spill. "Priority" analyses are completed within 1-3 business days after receipt of the case.

A "Rush" analysis is reserved for cases involving a detained vessel, a closed port, or if extreme public interest and media coverage has been generated due to the spill. Results will be made available as soon as possible, even if it is outside normal business hours.

"Rush" analyses require special staffing arrangements and often special shipping arrangements. Saturday delivery of samples must be arranged with MSL BEFORE the samples are given to FedEx. If MSL staff will be required over the weekend or during the night, MSL shall be contacted by the unit ahead of time with the number of samples, case details and a tracking number. Failure to notify MSL of a "Rush" analysis prior to sample submission greatly reduces the probability a "Rush" request can be accommodated.

The point of contact provided for a "Rush" request must be available outside normal working hours. MSL will not leave results on voicemail. The phone number provided shall be one for a person prepared to receive verbal results as soon as they are available.

These are not the only reasons to request a "Rush" or "Priority" analysis, but units should use discretion when making these requests.

MSL's routine business hours are Monday-Friday 0730-1600 Eastern Standard Time. The duty watch stander is available 24/7 at (860) 912-8022.

Sample Shipment

Proper shipment of samples to MSL is an important step in pollution investigations. All oil samples collected by USCG investigators shall be submitted to MSL, as per USCG Marine Safety Manual, Volume V, Part B, Chapter 8. The use of other laboratories for the analysis of oil samples is not authorized.

Samples shall be submitted as soon as possible after collection to reduce the effects of weathering. A sample may become too degraded for analysis if held at the unit, even when properly stored in the refrigerator. The samples should be designated "Prep Only" on the LoR if the unit does not require analysis at the time of shipment but may require it at a later time, such as for a NOV case. Attachment 4 contains an example of a memorandum requesting MSL either analyze or dispose of samples originally submitted as "Prep Only."

MSL recommends that samples be shipped by a method that assigns a unique, traceable number to each package. Suggested methods include Federal Express, registered domestic mail, or other similar carriers that assign a specific airway bill and/or tracking number to a package.

Oil spill samples are Dangerous Goods so the packaging and shipment of samples are regulated by 49 CFR. Most carriers belong to the International Civil Air Organization (ICAO) and regulate Dangerous Goods using the International Air Transport Association Dangerous Goods Regulations (IATA DGR). These guidelines are more stringent than those found in 49 CFR and are allowed under 49 CFR 171.22.

MSL's guidance is in accordance with IATA DGR. It is the responsibility of the shipper to check transportation regulations and ensure each package is compliant with current regulations.

Packaging Samples

The guidance provided below is intended for:

- Samples containing strictly petroleum products and water. Sheen net and sorbent samples are covered by this guidance. Any other chemical contaminants will make the sample subject to different regulations.
- Samples in 4 oz. or smaller glass sample jars, up to eight (8) jars per box.

Refer to the IATA DGR for the proper method of packaging and shipping whenever samples do not meet the criteria provided above. MSL's guidance does not supersede or replace the regulations established in the IATA DGR.

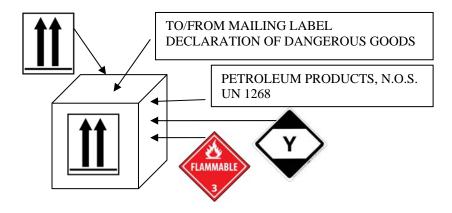
Samples should be shipped as Petroleum Products, N.O.S., UN 1268, PGII.

Inner Packaging

Samples should be shipped in 4 oz. glass jars with sufficient space allowed for expansion of samples during transport. No more than eight jars should be packed into a single box. Non-reactive cushioning must be used, as well as enough sorbent material to absorb the contents of one sample jar should it break. MSL recommends sealing each jar with vinyl electrical tape prior to placing it in the shipping tube to prevent leakage. Also check orientation of the jars within the box.

Outer Packaging

Samples should be packaged in a fiberboard box with a gross weight of no more than 30 kg (66 lbs). To/From addresses and a properly completed Declaration of Dangerous Goods must be included. One side of the box must contain the proper shipping name ("Petroleum Products, N.O.S.), UN1268, a Hazard Class 3 label and a Limited Quantity label. Orientation arrows shall be affixed to two opposite sides of the box.



Shipper's Declaration of Dangerous Goods (DoDG)

This guidance pertains only to the Declaration of Dangerous Goods (DoDG) for samples meeting the criteria specified under "Packaging Samples." Shipping any other type of sample requires consultation of the IATA DGR for proper regulations.

In accordance with IATA 1.5, unit personnel designated to sign the DoDG must be properly trained and certified to ship the samples. Training and certification is available from several commercial sources. For example, FedEx offers a 3-day IATA certification course at multiple locations throughout the year. Online certification is an acceptable alternative and may be preferred to reduce travel time and funding obligations. The shipper must retain a copy of the certificate and be able to produce it should the Federal Aviation Administration (FAA) audit a package.

A copy of the DoDG shall be maintained at the originating unit for a period of two years (49 CFR 172.201(e)).

As stated in ALCOAST 126/11 (Attachment 5), the FX-18 variation requires that the DoDG accompanying packages shipped via FedEx be completed using a FedEx provided shipping system. There are several pay per use sites available online if a FedEx shipping system is not available. Hand-written DoDG or those completed from a PDF are no longer accepted by FedEx.

<u>Attachment 6</u> provides an example of a completed DoDG. <u>Attachment 7</u> provides guidance for completing the DoDG.

The Oil Sample Analysis Report

The Oil Sample Analysis Report is made available to the unit as an attachment in MISLE. A Standard Evidence Item will be created by MSL, and the report uploaded to it as a PDF. A link to the Standard Evidence Item will be emailed to the Point of Contact once the report is available. Additional guidance on locating the report in MISLE is available on the MSL website (see "Finding the Analysis Report in MISLE" under the "Documents" tab).

The Oil Sample Analysis Report is comprised of five sections:

- 1. Title Page with case number and originating unit
- 2. Letter or Memo providing general MSL information and report contact
- 3. Chemist Report providing the correlation and identification results obtained from the samples
- 4. Cost Recovery Sheet, which is an itemized account of costs incurred during analysis. MSL prepares one sample in duplicate for quality control so the number of samples listed on this sheet will be one more than originally submitted (two more if a library sample was used for quality control). These costs are provided for informational purposes and may be added to total violation charges against the responsible party for the spill. MSL does not recoup these costs. Non-USCG customers are not responsible for reimbursing MSL for the charges listed.
- 5. Sample Check-In Log is the document generated by MSL to assign internal numbers to each case and sample. The original sample number, description, and date/time of sampling as provided on the sample jar label are recorded on the Check-In Log. If a case is being compared to samples previously analyzed by MSL, a copy of the comparison case Check-In Log is also provided.

Hardcopies of the report and/or supporting data are available upon request.

Understanding the Chemist's Report

Each petroleum oil has distinctive molecular characteristics that distinguish it from other oils. Known as a "fingerprint," these characteristics are used by the chemist to determine if a chemical relationship is present between oil samples. It is very important to note that the analysis is specific enough to distinguish between tanks on a single vessel. Therefore, all locations on a suspected vessel/facility should be sampled as opposed to a single location. The report may come back as a "non-match" if the exact tank from which the discharge occurred is not sampled, even when the responsible vessel/facility has been identified.

Two samples that are a "match" are said to "derive from a common source of petroleum oil." Samples that are different from each other are "not derived from a common source" and are a "non-match." Comparison of samples may be "inconclusive" if a sample is too degraded for comparison purposes or if non-petroleum contamination is interfering with the analysis.

Units are strongly encouraged to contact MSL with questions regarding the results, especially if the samples do not fit in to one of the three categories described above.

Sample Disposal

MSL retains samples in secured, refrigerated storage for a minimum of five fiscal years. At the end of this hold time, MSL submits a list of cases to each USCG District and to the National Pollution Funds Center (NPFC) requesting authorization to destroy samples no longer required for enforcement purposes. An investigating agency may contact MSL at any time to authorize the destruction of samples.

A reasonable effort will be made to reach a point of contact for non-USCG cases. The contact may request the samples be returned to the originating office or that they be destroyed. If a contact cannot be located or a response is not received after multiple attempts by MSL, the samples will be destroyed.

MSL's storage space is finite. Samples shall not be shipped to MSL solely for disposal. It is the responsibility of the unit to ensure oil samples not submitted to MSL are disposed of in accordance with applicable regulations.

The memorandum provided in <u>Attachment 4</u> may be used to notify MSL of final case disposition in NOV cases or any other case initially sent in as Prep Only.

The Marine Safety Lab Website

The MSL website offers many useful tools to Pollution Investigators and unit sample custodians. The site contains information on lab services and methodology. Within the "Documents" tab, unit personnel can find templates for sample case documentation, such as the CoC, LoR, DoDG, and sample labels. This tab also contains various PowerPoint presentations aimed at assisting units with sample preparation and shipment. The "Frequently Asked Questions" section offers answers to some of the most common unit questions, and also provides some examples of the most commonly noted discrepancies in case documentation.

Please visit our website at:

http://www.uscg.mil/hq/cg5/msl/default.asp

Attachment 1 - Suggested Sources of Supply

Nitrile Gloves

New Pig Government Scientific 1-800-468-4647 1-800-248-8030

Box (100) (references different sources of Kimberly Clark companies which sell gloves)
GLV107-(xs-xl sizes) http://www.govsci.com

Government Services Administration (GSA)

http://www.gsaadvantage.gov/

Sample Jars

Government Scientific Source Thermo Scientific 1-800-248-8030 1-800-550-4964

Case (24) Case (24) Item#130-04C Item#130-04C

http://www.govsci.com http://thermoscientific.com

General Oceanics

1-305-621-2882 http://www.generaloceanics.com

Case (24) Item#5080J1

Cardboard Mailing Tubes

Call MSL first, we may have them available for free

General Oceanics Government Scientific 1-305-621-2882 1-800-248-8030 Item#5080MT Item#5080MT

http://www.generaloceanics.com http://www.govsci.com

Sampling Poles

General Oceanics 1-305-621-2882 Item#2030WN

http://www.generaloceanics.com

Sampling Net Kit #1 (includes one 4" Teflon net with disposable ring/handle and two pairs of nitrile gloves)

General Oceanics 1-305-621-2882 Item# 5080-KIT

http://www.generaloceanics.com

Sampling Net Kit #2 (includes above sampling net kit plus sample jar ring and one 4 oz. Sample jar)

General Oceanics 1-305-621-2882

Item#5080-KIT2

http://www.generaloceanics.com

Pads for Swipe Sampling

General Oceanics 1-305-621-2882 Item#5080-PAD

http://www.generaloceanics.com

Jar rings for 4 oz. Sample Jar

General Oceanics 1-305-621-2882 Item#5080-JR

http://www.generaloceanics.com

Sample Kit Carrier

Pelican Products Stock #1550 w/Padded Divider http://www.gsaadvantage.gov

http://www.pelicancases.com

http://www.thepelicanstore.com

Sample Shipping Boxes/Kits

1. HazPlus (866-596-6786)

Company's website: http://www.hazplus.com/

Click on "4GV/Variation 2 Packaging" to find the following products:

2 x 250ml/8oz (or less) V-Pack, PART #30-1440

4 x 250ml/8oz (or less) V-Pack, PART #30-1441

6 x 250ml/8oz (or less) V-Pack, PART #30-1405

2. Labelmaster (800-621-5808)

Company's website: http://www.labelmaster.com/

Click on "UN Packing/4GV Packing" to find the following products:

2 x 250ml/8oz (or less) V-Pack, PART #UN4GV2X8A

4 x 250ml/8oz (or less) V-Pack, PART #UN4GV4X8A

6 x 250ml/8oz (or less) V-Pack, PART #UN4GV6X8A

Multiple sources online:

http://airseacontainers.com

http://uline.com

http://hazmat-boxes.com

http://cargopak.com

http://thecompliancecenter.com

Attachment 2 - Sample Chain of Custody

CHAIN OF CUSTODY RECORD

United States Coast Guard Commanding Officer

	Commanding Officer			
Unit Name:	10 10 10 10 10 10 10 10 10 10 10 10 10 1	12		
MISI E Incident Inve	stigation Activity Number:			
MISEE ITICIDED TITLE	sigation Activity Number.			

0 1	Chec	k Sample	Type.	CANT	DI E DESCRIPTIONS ED	OMIADIADE	ZT C
Sample Number	Spill	Source	Back- ground				
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Sample			quished	VE SAF	Control of the Contro	Date/	Reason for
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Attachment 2 - Sample Chain of Custody

Please see Sample Chain of Custody from MSL webpage at this hyperlink:

COC (PDF Version)

http://www.uscg.mil/hq/cg5/msl/docs/Chain%20of%20Custody%20Record.pdf

COC (Word Document)

http://www.uscg.mil/hq/cg5/msl/docs/Chain%20of%20Custody%20Record.docx

Attachment 3 - Sample Letter of Request



COMMANDING OFFICER
UNIT NAME



MEMORANDUM

r	om: TITLE/NAME/(SIGNATURE)				
Го	USCG Marine Safety Laboratory (CG MSL)				
su	bj: REQUEST FOR OIL SPILL SAMPLE ANALYSIS AND STORAGE				
	Total number of samples:				
	Type of Service:				
	□ REGULAR (Results available in 3-5 business days)				
	□ PRIORITY (Expedited analysis, results available in 1-2 business days)				
	□ RUSH (Results available ASAP. *Contact MSL directly for special arrangements)				
	Type of Investigation:				
	□ CIVIL □ CRIMINAL				
	Type of Analysis (Use line 8 for more specific instructions):				
	□ Comparison of samples				
	□ Comparison of samples to previously run CG MSL case number:				
	ID Only: Provide 'fingerprint' characteristics of each sample without comparing.				
	□ Prep Only: Prepare samples and store/preserve for potential future analysis.				
	MISLE Incident Investigation Activity number:				
	Federal Project Number (FPN) if applicable:				
	Unit Point of Contact:				
	Phone:(
	Additional sample information (optional):				

Attachment 3 - Sample Letter of Request

Please see Sample Letter of Request from MSL webpage at this hyperlink:

LOR (Word Document)

http://www.uscg.mil/hq/cg5/msl/docs/CG%20MSL%20Letter%20of%20Request.docx

Attachment 4 - Sample Letter of Disposition for Notice of Violation Case

U.S. Department of Homeland Security
United States
Coast Guard

UNIT INFORMATION

ADDRESS ADDRESS PHONE # FAX #

16482 DATE

MEMORANDUM

From: NAME Reply to UNIT Attn of:

To: Marine Safety Laboratory

Subj: DISPOSITION OF OIL SAMPLES FOR ACTIVITY ########

- 1. On (date) this office forwarded (number of samples) oil samples for sample (preparation/analysis) and subsequent storage at your facility for the activity number listed above.
- 2. This activity has been closed and authorization is granted to dispose of the samples in your custody.
- 3. If you have any questions, please contact (unit point of contact) at (phone number).

OR

- 2. This activity remains open and we now request analysis on the samples associated with this activity.
- 3. Please forward a copy of the MSL case report to this office upon completion of analysis.
- 4. If you have any questions, please contact (unit point of contact) at (phone number).

#

Attachment 5 - ALCOAST 126/11

When shipping Dangerous Goods via FedEx make sure you follow ALCOAST 126/11. If your unit does not have access to the FedEx provided shipping system or approved vendor software/applications you can use one of many pay per use online sites to create approved Declaration of Dangerous Goods.

R 231510Z MAR 11

ALCOAST 126/11

COMDTNOTE 5110

SUBJ: DANGEROUS GOODS SHIPPERS DECLARATION COMPLIANCE BY 31 MARCH 2011

- A. COMDT COGARD WASHINGTON DC 051821Z (AIG 4900)
- B. TRANSPORTATION OF FREIGHT, COMDTINST M4610.5(SERIES)
- C. FEDEX FX-18 VARIATION FOR DANGEROUS GOODS SHIPPER DECLARATIONS REQUIREMENTS
- 1. THIS ALCOAST REITERATES THE PROVISIONS OF REF A, PARTICULARLY THE 31 MARCH 2011 DEADLINE AFTER WHICH SHIPPERS OF HAZMAT(HM)/DANGEROUS GOODS (DG) MUST HAVE IN PLACE A METHOD OF CONDUCTING COMPLIANCE/EDIT CHECKS OF REQUIRED DECLARATIONS BEFORE A HM/DG SHIPMENT CAN BE MADE USING THE UNITS FEDEX ADMINISTRATIVE/SMALL PACKAGE (0 TO 150 LBS) ACCOUNT. THIS REQUIREMENT CAN ONLY BE ACCOMPLISHED BY REQUESTING A FEDEX PROVIDED SHIPPING SYSTEM OR BY THE USE OF APPROVED VENDOR SOFTWARE/APPLICATIONS.
- 2. SHIPPERS OF HM/DG MUST BE CERTIFIED/QUALIFIED TO MAKE THE SHIPMENT AND MUST BE THE INDIVIDUAL COMPLETING THE WAYBILL WHETHER ONLINE OR BY PAPER. IF A SHIPMENT IS AUDITED/VERIFIED BY THE FEDERAL AVIATION ADMINISTRATION AND THE SHIPPER IS UNABLE TO PROVIDE THE APPROPRIATE DOCUMENTATION, THE UNIT COULD BE ASSESSED SIGNIFICANT PENALTIES AND/OR FINES. PER REF B. CHAPTER 4, PARAGRAPH F.1. ALL PERSONNEL INVOLVED WITH THE PREPARATION AND SHIPMENT OF HAZMAT FOR COMMERCIAL OR SURFACE MILITARY TRANSPORTATION MUST RECEIVE TRAINING IAW TITLE 49 CFR 172.704.
- 3. VOLUME SHIPPERS (UNITS MAKING 20 OR MORE HM/DG SHIPMENTS PER YR): COMDT (CG-611) NEGOTIATED WITH FEDEX TO OBTAIN FEDEX SHIPPING SYSTEMS (COMPUTER, MONITOR, PRINTER, ETC.). A LIST OF THESE UNITS AND THE CURRENT STATUS REGARDING ORDERING/INSTALLATION CAN BE FOUND AT THE LINK BELOW (FILE NAME FX-18 FSMS).
- 4. ALL OTHER HM/DG SHIPPERS: ARE REQUIRED TO SELECT ONE OF THE TWO VENDORS INDENTIFIED IN REF C PARAGRAPH 4. TO PERFORM DATA-COMPLIANCE CHECKS OF HM/DG REQUIRED DOCUMENTATION.
- 5. AS A REMINDER, REF A STATED EFFECTIVE 1 JAN 2011, HAZMAT SHIPMENTS WILL REQUIRE FEDEX FORMS OP950, OP900, OP900LL AND OP900LG TO BE TYPED OR COMPUTER GENERATED, AND CANNOT BE HANDWRITTEN. THIS REQUIREMENT HAS NOT BEEN WAIVED.
- 6. UNITS ARE ENCOURAGED TO USE GROUND SERVICES (UNLESS THE USE OF EXPRESS IS REQUIRED BY POLICY, DIRECTIVE, OR REQUIRED DELIVERY DATE), AS THE PRIMARY MODE OF TRANSPORTATION.
- 7. ADDITIONAL INFORMATION IS AVAILABLE AT THE CG PORTAL URL BELOW (TYPE THE ENTIRE WEB ADDRESS IN LOWER CASE LETTERS):

Marine Safety Lab Transmittal Guide – 8th Edition – January 2013

HTTPS://CGPORTAL.USCG.MIL/LOTUS/MYQUICKR/POSTAL-MANAGEMENT WHEN THE PAGE OPENS, SELECT THE TAB TITLED FEDEX FX-18 VARIATION FOR DANGEROUS GOODS, CLICK ON THE FILE YOU WANT TO REVIEW, AND THEN SELECT DOWNLOAD FROM THE RIGHT COLUMN.

- 8. THE COMDT (CG-61) MAIL PROGRAM POC IS LEONARD BELCHER 202-475-3584, OR LEONARD.W.BELCHER(AT)USCG.MIL. THE COMDT (CG-44) TRANSPORTATION OF FREIGHT POC IS BRENDA BARRY 202-475-5654, OR BRENDA.B.BARRY(AT)USCG.MIL.
- 9. RDML R.E. DAY, ASSISTANT COMMANDANT FOR COMMAND, CONTROL, COMMUNICATIONS, COMPUTERS AND INFORMATION TECHNOLOGY, SENDS. 10. INTERNET RELEASE IS AUTHORIZED.

Attachment 6 - Sample Shipper's Declaration of Dangerous Goods

SHIPPER'S DECLARATION FOR DANGEROUS GOODS (Provide at least three copies to the airline.) Air Waybill No. (FULL NAME AND ADDRESS) Page 1 of 1 Pages Shipper's Reference Number (OPTIONAL) Consignee Manager Coast Guard Marine Safety Laboratory 1 Chelsea Street New London, CT. 06320 Two completed and signed copies of this Declaration must WARNING be handed to the operator TRANSPORT DETAILS Failure to comply with all respects with the applicable Airport of Departure Dangerous Goods Regulations may be in breach of This shipment is within the limitations prescribed for: the applicable law, subject to legal penalties. (delete non applicable) (OPTIONAL) PASSENGER AND CARGO AIRCRAFT Shipment type: (delete non-applicable) NON-RADIOACTIVE XXXXXXX (OPTIONAL) NATURE AND QUANTITY OF DANGEROUS GOODS Dangerous Goods Identification Quantity and Packing UN Authorization Class or Division (Subsidiary Risk) Pack-ing Group or ID type of packaging Inst. Proper Shipping Name UN II 1 fiberboard box x .96L Y341 LTD QTY Petroleum products, n.o.s. 1268 Additional Handling Information Name/Title of Signatory I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labelled/placarded, and are in all Place and Date respects in proper condition for transport according to applicable International and National Governmental Regulations. I declare that Signature [A typed signature may be used if the origin and destination (see warning above) are in the United States or its territories.] all of the applicable air transport requirements have been met. are in the United States or its territories.] Emergency Telephone Number FOR RADIOACTIVE MATERIAL SHIPMENT ACCEPTABLE FOR PASSENGER AIRCRAFT, THE SHIPMENT CONTAINS RADIOACTIVE MATERIAL INTENDED FOR USE IN OR INCIDENT TO RESEARCH, MEDICAL DIAGNOSIS, OR TREATMENT. ADR EUROPEAN TRANSPORT STATEMENT: CARRIAGE IN ACCORDANCE WITH 1.1.4.2.1

Attachment 6 - Sample Shipper's Declaration of Dangerous Goods

Please see the example Shipper's Declaration of Dangerous Goods from the MSL website at this link:

http://www.uscg.mil/hq/cg5/msl/docs/Example%20DoDG.pdf

Attachment 7 – Directions for Completing the Shipper's Declaration of Dangerous Goods

Heading	Proper Entry
Shipper	Full Name & Address of Shipper
Air Waybill No.	The Number of the Air Waybill #
•	the DODG will be attached to
	(Normally Assigned by Carrier)
Page of Pages	Page # / # of Pages
Consignee	Manager
	U.S. Coast Guard
	Marine Safety Laboratory
	1 Chelsea Street
	New London, CT 06320
Cargo Aircraft Only	Cross this Block Out
Airport of Departure	Full Name of the Airport, or City of
	Departure (Carrier can Amend this
	Section)
Airport of Destination	Full Name of the Airport, or City of
_	Destination (Carrier can Amend
	this Section)
Radioactive	Cross this Block Out
Proper Shipping Name	Petroleum Products, N.O.S.
Class or Division	3
UN or ID No.	UN 1268
Packing Group	II
Quantity and type of	1 Fiberboard Box X (Gross
packing	Quantity of Jars in L, no more
	than 1)
Packing Inst.	Y341
Authorization	Ltd. Qty.
Additional Handling	N/A
Information	
Emergency Contact phone	Not required for USCG (USG-12)
number	-
Name/Title of Signatory	Full Name and Title of person
	packaging shipment
Place and Date	City and Date DODG Prepared
Signature	Signature of person named in
	Block 17

MSL Contact Information:

U. S. Coast Guard Marine Safety Laboratory1 Chelsea Street, New London, CT 06320-5500

Voice: 860-271-2704

MSL Duty Cell: 860-912-8022

FAX: 860-271-2641 Email: msl@uscg.mil