

# FCS03 - SOP for Ordering, Receiving and Storage of Controlled Dangerous Substances

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## 1. Scope

- 1.1. This SOP covers the procedures to follow for ordering, receipt and storage of Controlled Dangerous Substances (CDS), including reference standards, within the Forensic Chemistry Unit (FCU).

## 2. Background

- 2.1. Due to the illegal and/or hazardous nature of CDS, appropriate procedures must be in place in order to ensure control of reference standards and to minimize risk of exposure, contamination or diversion of ordered reference materials. This SOP covers the controls taken and procedures followed when ordering, receiving and storing reference standards for CDS.

## 3. Safety

- 3.1. Read Safety Data Sheets (SDS) to determine the safety hazards for chemicals and reagents used in the standard operating procedures prior to initiating activities with chemicals.
- 3.2. Wear personal protective equipment (*i.e.*, lab coat, gloves, mask, eye protection), when carrying out standard operating procedures.

## 4. Materials Required

4.1. Not applicable

## **5. Standards and Controls**

5.1. Not applicable

## **6. Calibration**

6.1. Not applicable

## **7. Procedures**

7.1. Ordering of Controlled Dangerous Substances

7.1.1. Suppliers

7.1.1.1. Suppliers of Controlled Dangerous Substances will be registered with the Drug Enforcement Agency (DEA).

7.1.1.2. Suppliers will be evaluated to ensure that the supplier is DEA compliant for supply of CDS, and, ideally, ISO Guide 34 compliant.

7.1.1.3. The FCU will provide all legally required documentation for CDS purchasing. This includes DEA registration or relevant forms such as the DEA 222 form.

7.1.1.4. Either the vendor or a 3<sup>rd</sup> party proxy providing the drug must be authorized for selling of products or services in the District of Columbia.

7.1.1.5. The vendor must have a Department of Health (DOH) certificate to sell CDS in the District of Columbia.

7.1.2. Authorization

7.1.2.1. New suppliers must be authorized by the FCU Manager, or designee, before use.

7.1.3. Procedure for Ordering CDS Standards

7.1.3.1. When a chemist determines that CDS reference standards need to be ordered, they will submit a request to the FCU Manager, or designee, to authorize the order.

7.1.3.2. FCU Manager, or designee, will submit a request for a purchase order or will use an existing open purchase order.

7.2. Receiving of CDS

7.2.1. Authorization

7.2.1.1. Only individuals who are listed on the agency DEA 223 form or their designees are authorized to receive CDS standards.

7.2.2. Shipping Address

7.2.2.1. Packages containing Controlled Dangerous Substance (CDS) reference standards will be addressed in the following manner, or near approximate):

Attn: Forensic Chemistry Unit-SET ASIDE  
Consolidated Forensics Laboratory  
401 E St SW, 2<sup>nd</sup> Floor  
Washington, DC 20024

7.2.3. Receipt Procedure

7.2.3.1. Packages containing Controlled Dangerous Substance reference standards will be received by the Consolidated Forensics Laboratory (CFL) Dock Manager or designee and will be set aside apart from other received packages in a secured area to prevent access by unauthorized personnel.

7.2.3.2. If practicable, the FCU Manager, or designee, will inform the CFL Dock Manager before package receipt if a package will need to be set aside.

7.2.3.3. The Dock Manager, or designee, will notify the FCU Manager, or designee, of the package's arrival upon delivery to the CFL.

7.2.3.4. The FCU Manager, or designee, will take custody of the package as soon as possible after receipt and will transfer to the FCU Controlled Dangerous Substance (CDS) laboratory and secured.

7.2.3.5. The Public Health Lab (PHL) Accessioning Unit may accept the package from the CFL Dock Manager or designee for temporary storage but will not be permitted to open the package.

7.2.3.6. The package's contents will be inspected to ensure their proper handling and will be stored in a secure location according to 7.3. Storage of Controlled Dangerous Substances. The Unit Manager or Technical Supervisor is responsible for verifying the contents and will update the appropriate logbooks.

7.2.4. Access Controls

7.2.4.1. The CFL is a secured facility and the package receipt and shipping areas are not open to the public.

7.3. Storage of Controlled Dangerous Substances

7.3.1. Storage Locations

7.3.1.1. CDS Standards that are not in use will be stored in the secured Drug Vault area of the CDS lab.

7.3.2. Documentation

7.3.2.1. CDS Standards will be documented in the CDS Standards Logbook (or electronic equivalent) upon receipt, use, emptying or disposal. Access to the logbook will be controlled and password protected in order to prevent unauthorized modification of records.

7.3.3. Security Protocols

7.3.3.1. Storage containers for CDS standards will be locked and kept in the secure Drug Vault.

7.3.3.2. The FCU Manager, and/or designee, and the DFS Health and Safety Manager will have iris scan access to the Drug Vault.

7.3.3.3. The FCU Manager, or designee, will have key access to Drug Freezers.

7.3.3.4. All CDS standards will be inventoried upon storage to the CDS Standards Logbook (or electronic equivalent).

7.3.4. Secondary Standard Storage

7.3.4.1. Samples of particular cases of interest may be retained for reagent testing, examination or for a training case.

7.3.4.2. A notification will be sent to the submitter and any interested parties asking for permission before retaining a sample this way.

7.3.4.3. If a sample is retained this way, the weight of the sample taken for this case will be documented in both the case file and the Secondary Standards Logbook (or electronic equivalent).

7.3.4.4. The amount of material remaining in the case after taking a retained sample should be sufficient for retesting. Care should be taken to only select samples for retention that will avoid total sample consumption.

7.3.4.5. Secondary standards will be securely stored in the FCU Drug Vault when not in use.

7.3.5. Working Standard Storage

7.3.5.1. Working standard solutions that are used on a regular basis for analysis are stored in the main CDS Laboratory area in a secured container when not in use.

7.3.6. Drug Inventory Audits

7.3.6.1. Every three months, an internal inventory will be taken of all drug

standards currently in FCU's possession in order to verify the accuracy of the CDS Standards Logbook (or electronic equivalent).

7.3.6.2. At the conclusion of the drug inventory audit, the current CDS Standards Logbook (or electronic equivalent) will be archived and an updated CDS Standards Logbook (or electronic equivalent) will be generated with updated information on the standards currently in the Forensic Chemistry Unit's possession.

7.3.6.2.1. The newly generated CDS Standards Logbook will only contain information on currently retained CDS standards and will not contain information on standards that have been completely consumed prior to the most recent Drug Inventory Audit.

7.3.6.2.2. Alternatively, the newly generated CDS Standards Logbook may contain information for both non-expended and expended standards as long as the categories can be clearly separated (i.e. in generated reports).

7.3.6.3. Standards that have been completely consumed will have records of use retained in the archived CDS Standards Logbooks (or electronic equivalent).

## **8. Sampling**

8.1. Not applicable.

## **9. Calculations**

9.1. Not applicable.

## **10. Uncertainty of Measurement**

10.1. Not Applicable.

## **11. Limitations**

11.1. This is only a general procedure and may be modified with additional controls or safety procedures, if it is deemed necessary.

## **12. Documentation**

12.1. CDS Standards Logbook

12.2. Secondary Standards Logbook

## **13. References**

13.1. Forensic Chemistry Unit Quality Assurance Manual, (Current Revision).

13.2. DFS Departmental Operations Manuals, (Current Revision).