

HASQARD Focus Group
Meeting Minutes
February 3, 2010

The meeting was called to order by Don Hart, Acting Focus Group Chairman, at 9:30 AM on February 3, 2010 in Federal Office Building Rm. 780.

Those attending were: Lynn Albin, Taffy Almeida, Laura Buelow, Glen Clark, Cindy English, Al Hawkins, Jim Jewett, Kris Kuhl-Klinger, Joan Kessner, Larry Markel, George Mata, Huei Meznarich, Karl Pool, Steve Smith, Noe'l Smith-Jackson, Chris Sutton, Chris Thompson, Rich Weis, Eric Wyse, Cliff Watkins, Stuart Huggins, Bill Thackaberry, Doug Duvon, Shelby Turner, Mike Hassell, Heather Anastos.

- I. Don Hart requested input on whether the group convened was complete. It was suggested that Aruna Arakali be contacted to see if he wants to represent WTP at these meetings. Karl Pool added that in the past, WTP has been reluctant to participate in HASQARD efforts. Al Hawkins said he would encourage WTP to participate.
Action: Don will contact Ms. Arakali to gauge her interest in the Focus Group. Al Hawkins will contact Pat Carrier to request WTP involvement.
- II. Don Hart requested a round table introduction
- III. Cliff Watkins was introduced as Secretary of the Committee with responsibilities to include production of meeting minutes, action tracking and follow-up.
- IV. Don Hart stated that the MSA has responsibility for HASQARD maintenance in their contract and Al Hawkins asked him to coordinate reconvening the Focus Group. Al Hawkins said that hearing no objections he would like to appoint Don Hart to the chairman position. No objections were tendered and Don was appointed Chairman of the HASQARD Focus Group.
- V. Don stated that he spent a bit of time leading up to this meeting looking into the process with which the group operates and requested input from the group when we need to invoke procedure.
- VI. A discussion was held on the status of the Focus Group Charter. It was recognized that no version of the document is up to date. Don asked the group to look at the 2006 version of the charter to see if the wording is problematic for incorporation in a new charter. Jim Jewett asked how the DOE lead section of the charter will be worded. Al Hawkins said that RL and ORP will share equally in the responsibilities. Don Hart added that he has talked to Andy Stevens at ORP and Andy indicated he expects he'll be involved.
Action: Don and Cliff will draft a revised charter for presentation to the group

for acceptance.

- VII. A discussion was held on handling interpretations. Don Hart requested Karl Pool to provide some historical background on this subject. Karl said that the HASQARD e-mailbox was used to submit issues. He stated that the box was perhaps not monitored, nor used, as well as envisioned. The typical situation was laboratory or field personnel would get issues to the Focus Group's attention through Focus Group members. Questions involving interpretation would then come before the group. The issue would be discussed and some level of agreement would be reached. Some items would then be cued for inclusion in the next revision of the document. Al Hawkins asked if the group always worked on a consensus basis or just majority vote. Karl said by vote rather than consensus. Rich Weiss added that historically, most of the effort of the Focus Group was spent getting Rev. 3 produced, so the questions of interpretation were always resolved and cued for inclusion in Rev. 3. Joan Kessner added that the resolution would be communicated to whoever brought the issue up so the individual with the concern had closure. Sometimes, interpretations were easy and verbal communication of the Focus Group's interpretation was all that was needed. Al Hawkins discussed the contractual nature of the HASQARD document and asked whether a change in the document necessitated DOE contract officers to issue a change request to the contracts. The group indicated that a letter from a contracts officer would be required. There was a general discussion about a desire to be able to quickly communicate interpretations that result in changed language in the HASQARD. The group would like to see a web site created and maintained where HASQARD and all current interpretations could be posted for use by the user community.

Action: Al Hawkins will discuss changes to HASQARD with contract officers to seek the easiest method to communicate them.

Action: Don Hart will check to see if HASQARD e-mailbox still works.

Don asked if interpretive issues could be resolved via e-mail.

Kris Kuhl-Klinger stated that would depend on the complexity of the interpretation, how much explanation of the perspective of the person asking for the interpretation is needed, etc. Huei Meznarich stated that Volume 4 of HASQARD is probably in better shape than the sampling volume. Rich Weiss added perspective of the HEIS Technical Advisory Group which has to address similar issues. This group uses monthly meetings with an agenda that typically includes 1-7 issues. When consensus is reached it is disseminated electronically. Rich suggested HASQARD could operate in a similar manner Huei Meznarich indicated that ownership of the web site that has HASQARD on it and how to obtain the most current documents has been an issue in the past. Don Hart stated that if we attempt to streamline the interpretation process, he will err on the side of inclusion of people for input rather than exclusion.

Action: Don and Cliff to develop process for handling interpretations.

- VIII. The discussion of the current requirement to use custody tape on every sample bottle versus a proposed revision to allow an option to use the tape on a secondary container was held. Many opinions and points of view were discussed on this matter. The representatives from the Regulatory Agencies present indicated no opposition to any of the proposed revisions to the HASQARD. Laura Buelow of EPA stated that EPA's position would be to ease off requirements and allow projects to decide the best way to meet custody requirements. Chris Sutton indicated he had done research into the requirements in the 2008 revision of the EPA CLP Samplers Guide. That document does not require every bottle to be sealed allowing the shipping container to be sealed instead. A vote was held to accept the proposed revised language. The voting members were established as:

Joan Kessner – Washington Closure Hanford
Steve Smith – CH2MHill Plateau Remediation Company
Chris Thompson – Battelle Pacific Northwest National Laboratory
Eric Wyse – Advanced Testing Laboratories
Larry Markel – Washington River Protection Solutions
Huei Meznarich – Mission Support Alliance

By unanimous vote the originally proposed language was accepted to be issued as an interpretation.

A discussion of the contractual implications of issuing a change like this was held. DOE will likely issue revisions to the HASQARD in letters stating that in the opinion of the Government the changes do not represent an increase in cost to the contractor and should not require a request for equitable adjustment. However, this will be discussed between Al Hawkins and DOE contracts officers as part of the previously mentioned action item.

A discussion on the fact that Volume 2 of the HASQARD needs a major revision was held.

Action: Chris Sutton will lead a subcommittee aimed at preparing Rev. 4 of Volume 2. Joan Kessner will ask Wendy Thompson if she will represent WCH in this effort. Larry Markel will determine and appropriate representative for WRPS. Chris Thompson will check on PNNL participation.

Action: Al Hawkins will talk to PNSO and ORP to ensure a Federal interface is established for HASQARD matters.

- IX. Eric Wyse discussed an issue he has with MDL requirements as stated in HASQARD. Eric has been reading about EPA's desire to move away from the traditional method for determining MDL using the technique described in 40CFR 136, Appendix B. The literature Eric has been reviewing indicates EPA is suggesting a move toward a quantification limit and reporting limit

approach as opposed to the traditional MDLs. Eric would like to see HASQARD reflect this position. A discussion of where the driver for MDLs comes from was held. Noel Smith Jackson said she assumes the need for low MDLs comes from the need for measurements at the low concentrations associated with toxicity and risk assessment decisions. Lynn Albin said that most Department of Health measurements are based on reporting to MDLs. Huei Meznarich and others agreed that the MDL versus PRQL issue is customer specific and these requirements should be determined during the DQO process and passed down to the laboratory. Additional discussion indicated more specific information on this matter was required before any decisions could be made; Eric Wyse agreed to send out additional references for people to have. The matter was tabled pending further information being provided the group.

Action: Eric Wyse to provide references that are the basis for his proposal to revise the HASQARD language on MDLs

- X. Jim Jewitt discussed the issue of preparation blank data reporting being associated with a “shall” for inorganic analysis and only associated with a “should” for organic and radiochemistry analyses. Larry Markel stated that he suspects the language in these sections came from analytical methods from which the QC reporting requirements in the HASQARD were derived. Huei Meznarich concurred with Jim Jewett that this discrepancy is confusing for the laboratory. She added that data reporting requirements are found elsewhere in the HASQARD and they need not be specified in the Quality Control (Section 6) {**Post-Meeting Secretary’s Note:** Section 5.0 of Volume 4 of the HASQARD discusses Data Reporting. However, the amount of QC data to be reported is not specified. Rather, the HASQARD says, “Appropriate QC results (correlation with sample batch shall be traceable and documented)”}. Lynn Albin stated that DOH would expect to see prep blank results with data packages used for decision making. Rich Weiss stated that a general scrub of all uses of the words “shall” and “should” should be undertaken. For the specific issue being discussed, he proposed language such as “The data generated as a result of prep blank analysis shall be retained by the laboratory and provided with data packages as specified by the client.” Rich added that there are likely many instances where language like that should be added to the HASQARD Volume 4. Don Hart proposed a subcommittee convene to look at this issue for incorporation in a revision to the HASQARD. Volunteers for this subcommittee were selected.
- Action:** Rich Weiss, Eric Wyse, Huei Meznarich, Heather Anastos and Jim Jewett will begin addressing this issue.
- XI. Don Hart stated that Cindy English and Cliff Watkins have been requested to look at the requirements flow down issue mentioned in the Operational Awareness entry prepared by Tom Ferns.

- XII. A discussion was held on the gap analyses that have been performed and still need to be performed comparing the DOE Quality Systems for Analytical Services (QSAS) Revision 2.5 to HASQARD Revision 3. The goal is to integrate the two documents as appropriate. The gap analyses that have been done in the past (except the one recently completed by Cindy English on Volume 1 of the HASQARD) were done before the most recent QSAS was issued. Rich Weiss pointed out that the QSAS is not “locked” and we could propose changes to it if necessary. He also pointed out that the HASQARD is much larger in scope than the QSAS so the QSAS could never replace HASQARD. Eric Wyse indicated he had done a recent gap analysis on the HASQARD versus QSAS and said he would distribute his results.
Action: Eric Wyse to distribute QSAS vs. HASQARD gap analysis results.
- XIII. The final order of business was to discuss a preferred time and place for future meetings. The group agreed Thursday afternoons work good for people coming in from the areas. No preferred location was determined. Don Hart said he will be scheduling another meeting in two weeks since there are several unresolved items still being discussed, subcommittees organizing, etc.
Action: Don Hart to schedule next meeting and notify the HASQARD Focus Group.

The meeting adjourned at 11:50 AM.