

HASQARD Focus Group
Meeting Minutes
January 18, 2011

The meeting was called to order by Dave Crawford, Focus Group Chairman at 2:08 PM on January 18, 2011 in Conference Room 208 at 2425 Stevens.

Those attending were: Dave Crawford (Chair), Cliff Watkins (Secretary), Heather Anastos, Paula Ciszak, Jim Conca, Scott Conley, Glen Clark, Scott Conley, Jim Douglas, Scot Fitzgerald, Stewart Huggins, Jim Jewett, Joan Kessner, Larry Markel, Huei Meznarich, Karl Pool, Dave Shea, Steve Smith, Chris Sutton, Amanda Tuttle, Rich Weiss, Eric Wyse.

Dave requested the new attendees to introduce themselves and their affiliation. The new attendees were: Jim Conca (Director of WSCF Laboratory), Scott Conley (Sampling Activities Manager for CHPRC), Jim Douglas (CHPRC), Amanda Tuttle (WCH QA), Stuart Huggins (CHPRC Groundwater QA).

- I. Dave Crawford requested approval of the minutes from the November 16 meeting. The Secretary noted that comments were made and were shown in the text of the minutes distributed. No objections were raised to the November meeting minutes and hearing no objections were approved. The Chairman then requested comment on the December minutes. Hearing no comments or objections, the minutes from the December 13 meeting were approved.
- II. The Action Tracking matrix was not discussed knowing that the discussion of the use of custody tape and the organic subcommittee's presentation would likely consume the remainder of the meeting's available time. The Chairman requested that all actions on the action tracking matrix be deferred by one month.
- III. Chris Sutton requested that the matter of applying custody tape to bottles be re-addressed as an agenda item for this meeting of the Focus Group. Chris reminded the Group that he and Huei Meznarich had accepted an assignment at the last Focus Group meeting to get together and see if an agreement on proposed language could be achieved that would satisfy CHPRC sampling personnel and WSCF laboratory safety concerns. Chris stated that a meeting had been held and while no agreement was reached, a path forward was agreed to. The path forward was to discuss this issue one more time with the Focus group because the issue transcends all contractors collecting samples at the site.

CHPRC's current practice is to put custody tape on all bottles, around the top and on the glass with the initials of the sampler. All primary containers are taped. WSCF has a safety concern with the use of tape. Tape can stick to gloves and even after removal of the tape, a sticky residue remains making it

easy to inadvertently have a bottle stick to a lab coat or glove resulting in spilling the sample or in the worst case pulling the sample bottle out of a hood where it falls to the floor and breaks.

CHPRC takes a conservative approach to use of custody tape because they want to meet requirements associated with ensuring samples are allowable and defensible as evidence in court hearings that may occur associated with closure of CHPRC sites. The use of custody tape is done to minimize liability associated with ensuring the integrity of samples collected and delivered to laboratories. Because they ship samples to multiple laboratories, because there are other safety issues with putting tape on secondary bags containing the primary sample container, and because not all samples are delivered in coolers, CHPRC does not want to change their conservative approach to custody because of a concern being raised at only one laboratory. CHPRC believes a change in this procedure would require approval from Environmental QA and possibly CHPRC Legal and the Regulators.

The path forward agreed to by CHPRC and WSCF was to bring the matter back to the Focus Group and discuss experiences of other contractors at Hanford concerning this issue.

Steve Smith stated that as of today, CHPRC is in compliance with all known guidance and requirements for ensuring sample custody by use of custody seals. He believes that if some sort of relief from the use of custody seals is granted, it may be more than a de minimis change and require a contract change from DOE to allow deviation from published requirements.

Dave Crawford stated that this issue represents a technical challenge and safety concern between WSCF and sampling organizations sending samples to WSCF, but does not become a Focus Group issue until a proposed revision to the HASQARD can be proposed.

Paula Ciszak suggested that there may be some other solutions like the use of less sticky custody seals. Scott Conley stated that he agreed and that alternative materials are being investigated.

Rich Weiss reminded the group that this issue began as a discussion of VOA vials that are either tared before sample collection or are used in auto-samplers that get jammed if sticky residue from tape remains on the vial. Chris Sutton said sampling personnel recognize this issue and package VOA samples in plastic bags which are sealed. Chris said VOA vials are no longer the issue, it's all other bottles.

Stewart Huggins asked if any other sampling organizations hear this issue from any other laboratories or if broken samples due to the use of custody seals are a recurring issue.

Joan Kessner says that they have samples lost on very rare occasions, but it is usually not known if this is due to breakage during shipping, a bad sample bottle having a weakness that caused it to break under normal handling conditions or if it was the result of the custody tape issues being discussed. She said that WCH's laboratories have never raised the issue of custody tape causing problems. Scot Conley echoed this perspective from CHPRC.

Dave Crawford suggested that Chris Sutton take the action to prepare revised language for the HASQARD and provide it to the Focus Group at the next meeting.

Jim Conca stated that the proposed language looked OK to him.

Chris Sutton stated that he believes the language that Jim Conca was reading was not the language on the web site (<http://www.hanford.gov/page.cfm/HASQARDFocusGroup>). The Secretary stated that this could be the case because the wrong file may have been provided.

Editorial Note: The actual language on the web site is:

The text of the sixth paragraph in HASQARD Volume 2, Revision 3, Section 4.2.4 is revised to say:

“Custody seals shall be used to verify that sample integrity has been maintained during transport. The field custodian shall seal the cap of the individual sample container so that any tampering is easy to detect. In lieu of using a custody seal directly applied to sample containers, the sample container may be placed inside a secondary container that is sealed with a custody seal. Custody tape shall be selected that is not removable from the shipping container without breaking the seal. Samples shall be shipped in insulated containers with either synthetic ice or ice packed in plastic bags when samples require cooling to $4\pm 2^{\circ}\text{C}$.”

Scott Conley suggested that WSCF take the lead on this action because they have the issue with the current language and CHPRC does not.

Dave Crawford agreed and assigned the **Action Item** to provide proposed language to Jim Conca and Huei Meznarich.

- IV. The schedule status of the subcommittees established to compare the QSAS and HASQARD requirements was not discussed because the Chairman wanted to devote the rest of the time established for this meeting to ensure the organic analysis subcommittee could get as close to finishing their presentation as possible.

V. New Business

- a. Eric Wyse mentioned that the HASQARD currently does not specify a standard reference for the physical properties of radiological constituents (e.g., half lives). He believes the Focus Group should consider specifying one.
- b. Eric Wyse has proposed alternative language for the Method Detection Limit (MDL) determination and verification sections of HASQARD. The secretary has distributed that language to the coordinators of the subcommittees for their consideration as they prepare proposed revisions to be incorporated in revision 4 of the HASQARD.

VI. HASQARD Revision 4 Proposals

- a. The organic analysis subcommittee continued their presentation of revisions they suggest should and should not be made to the HASQARD Volume 4 as a result of the DOECAP/QSAS/HASQARD gap analysis.

The members of the organic analysis subcommittee documented the group's comments electronically as they presented. The highlights of the groups discussions are presented below:

A proposed revision to Section 4.4.3 to add a requirement to dilute an extract or analyze less sample when a constituent is present at a concentration greater than the highest analyzed standard was discussed. Some felt that this requirement was universal to all analyses and not an organic analysis issue. Karl Pool stated that ICP methods allow quantitative results be reported without qualification if a concentration exceeds the highest standard and linearity in that concentration range has been demonstrated by that instrument. The Focus group asked this material be re-evaluated after the other subcommittees present their proposed revisions to see if revised language is still needed.

A revision to Section 4.2.4 was proposed specifying which records are required to be retained for calibration data. The Focus Group requested the organic subcommittee to make sure these details are not covered in some other part of HASQARD.

A revision to Section 5.2.3 was proposed stating that data review will be documented and records retained for inspection. The group debated what this would require. Most agreed that a checklist of some sort is used for data review and that would suffice as documentation. The proposed language was approved.

A revision to Section 6.1 was proposed that would add specificity to

actions taken when blank contamination is discovered by the laboratory. This was discussed by the group and some of the words from the QSAS that were proposed such as “corrective action plan” were not palatable to the Focus Group. Eric Wyse mentioned that the tables in HASQARD concerning blank contamination were less detailed than the proposed new language and would like to see the document stay consistent. Eric Wyse accepted an **Action Item** to provide revised language for this proposed revision. Larry Markel added that there’s a bulleted corrective action section that already may include contamination, but he believes that blank contamination is already covered in the Organic QC section and is sufficient for analytical work.

A revision to Section 6.1.4 was proposed that would add requirements for pre-approval of reagents prior to use. The Focus Group had no comments on this proposed revision.

A revision to Section 6.6.3 was proposed that would add specificity to how the number of analytes used in LCS samples is determined. The Focus Group had no comments on this proposed revision.

A revision to Section 6.6.3 was proposed that would add a requirement to obtain the standards used for preparation of LCS samples from an independent source when the continuing calibration standard and initial calibration standards are obtained from the same source. The wording of these requirements was deemed confusing and the Focus Group rejected this proposed revision.

A revision to Section 6.6.4 was proposed that would add specificity to how the number of analytes used in matrix spike samples is determined. The Focus Group had no comments on this proposed revision.

A revision to Section 6.7.1 was proposed that would add specificity to the requirements for confirmation analyses on GC instruments. After discussing this issue Hue Meznarich accepted an **Action Item** to revise the language presented and propose new language for confirmation analyses.

Another revision to Section 6.7.1 was proposed that would add specificity to the requirements for the documentation contained in run logs. After discussing this issue Hue Meznarich accepted an **Action Item** to revise the language presented and propose new language for run log requirements and determine the most appropriate place in the document for these specifications.

A proposed new footnote to Table 6-7 was accepted by the Focus Group except that it had erroneously been placed under Table 6-8.

A revision to Section 7.5 was proposed that would add specificity that laboratories have procedures in place to document the approach taken to determine detection limits and that this procedure specifies the frequency at which they are determined or verified. The Focus Group had no comments on this proposed revision.

A revision to Section 7.5.1.1 was proposed that would add specificity to the frequency and method for updating and/or verifying MDLs. A specific resolution on this language was deferred in light of the fact that Eric Wyse has recently proposed MDL language that may address this proposed revision. The specific language used for annual verification of MDLs will be decided based on the consideration of Eric's proposal.

A revision to Section 7.5.1.3 was proposed that would add specificity to the frequency for verifying EQLs. A specific resolution on this language was deferred in light of the fact that Eric Wyse has recently proposed MDL language that may address this proposed revision. The specific language used for annual verification of MDLs will be decided based on the consideration of Eric's proposal.

This concluded the organic analysis subcommittee's presentation of proposed revisions based on the material found in the QSAS but not in HASQARD.

Hearing neither additional new business nor objections to the proposal to adjourn, Dave Crawford adjourned the meeting at 3:55 PM. The next meeting is scheduled for February 15, 2011 at 2420 Stevens, Room 153.