



FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.

**Regulatory Audit
of**

**Quality Environmental Services
Joe Boatman**

**Quality Environmental Services
Preliminary Assessment
1815 Regal Ct., Unit B
Louisville, CO 80027**

**(234 Regulatory Violations
of 6 CCR 1014-3)**

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EXECUTIVE SUMMARY

Forensic Applications Consulting Technologies, Inc. (FACTs) is a private S-Corporation in the State of Colorado offering classical Industrial Hygiene services.

FACTs is performing a series of regulatory audits on public domain documents. This document has been prepared by Forensic Applications Consulting Technologies, Inc. in response to actions by the Boulder County Department of Health, and the Colorado Department of Public Health and Environment (CDPHE), and pursuant to the provisions of C.R.S. 18-8-115 *Duty to report a crime - liability for disclosure*.

This review pertains to the document identified as:

PRELIMINARY ASSESSMENT REPORT
1815 Regal Ct., Unit B, Louisville, CO 80027
Prepared For
Don Roybal
Boulder County Housing Authority
PO Box 471
Boulder, CO 80306

Prepared By
Joe F. Boatman
Quality Environmental Services
4432 Wellington Road, Boulder, CO 80301
June 28, 2015

The purpose of this review is to document regulatory violations associated with regulatory work regarding the assessment of methamphetamine affected properties (6 CCR 1014-3). The level of scrutiny employed in this review is that which has been established by Mr. Michael Richen (Boulder County Department of Health).

The Contractor in question, Quality Environmental Services (QES), has an increasingly long history of technical incompetence and regulatory violations.^{1,2,3,4}

¹ 769 Cleveland Circle, Lafayette, CO 80026, February 10, 2015 , CO (Secure review available here: http://forensic-applications.com/meth/BCDH_Secure/Boatman_Cleveland_RA.pdf) Username required: BCHA_01; Password required: BCHealth_01

² 731 Excelsior Place, Lafayette, CO 80026 (Secure review available here: http://forensic-applications.com/meth/BCDH_Secure/Boatman_Excelsior_PA_RA.pdf) Username required: BCHA_01; Password required: BCHealth_01

³ 502C West South Boulder Road Louisville, CO 80027 (Secure review available here: http://forensic-applications.com/meth/BCDH_Secure/Boatman_502C_PA_RA.pdf) Username required: BCHA_01; Password required: BCHealth_01

⁴ Screening Level Assessment, 1815 Regal Ct., Unit B, Louisville, CO 80027 (Secure review available here: http://www.forensic-applications.com/meth/Boatman_Screening_Regal_RA.pdf) Username required: BCHA_01; Password required: BCHealth_01



For this regulatory audit, FACTs has identified no fewer than 234 total individual regulatory violations. The 234 individual regulatory violations are grouped into 34 broader categories.

REVIEW OF THE DOCUMENT

During the performance of a Preliminary Assessment for methamphetamine contamination in a property, the Consultant is required by regulations to perform specific mandatory tasks and provide specific mandatory documentation.

In reviewing the Preliminary Assessment report by Quality Environmental Services, (QES) prepared for 1815 Regal Ct., Unit B, Louisville, CO 80027 (the subject property), the following deficiencies have been identified:

Inability to Comply with Section 4.6

During the performance of a Screening Assessment, the Consultant is required by regulations to perform specific mandatory functions including:

4.6 Identification of chemicals used, based on the Consultant's observations and knowledge of manufacturing method(s), and if available, identification and documentation of any methamphetamine lab wastes or precursor chemicals discovered at the subject property.

Inherent in this language is the intent that the consultant would have the appropriate training and knowledge to make such decisions and observations.

The regulations were revised in December of 2014 to counter the serious problem created by fraudulent and incompetent consultants who were performing invalid assessments. Forensic Applications Consulting Technologies, Inc. (the author of this review), helped the State Legislature write the statutory language that eventually became codified and required the Colorado Department of Public Health and Environment (CDPHE) to revise the regulations. Unfortunately, the task for the revision was given to the CDPHE regulator who, in violation of Colorado's criminal statutes, had helped create the problem in the first place.⁵

The revised regulations required the CDPHE to restrict Authorization for performing assessments under the regulations exclusively to those consultants who were A) *bona fide* Industrial Hygienists, and B) had an history of performing valid assessments under the old regulations. Instead, the CDPHE handed *carte blanc* Authorization to anyone who applied, including individuals with no known knowledge of Industrial Hygiene, and the untrained fraudulent consultants who had been performing fraudulent and invalid assessments, which was the reason for this revision.

⁵ See for example, the discussion here: http://www.forensic-applications.com/meth/Addendum_7_Woellner_11767_Grant.pdf



For this subject property, the consultant who performed the reported work has never provided any documentation which indicates that he has any knowledge or training in Industrial Hygiene, or in the assessment of illegal drug laboratories. As such, there is no expectation that the consultant would possess the necessary skills or knowledge to fulfill the regulatory requirements. This opinion is supported by incompetence and regulatory violations exhibited by the consultant as documented in the past, and in this review.

To date, including the violations identified in this review, FACTs has identified no fewer than 1,051 (one thousand and fifty one) regulatory violations by this consultant. For this property, for example, the consultant is so apparently incompetent, that he was incapable of even identifying the correct regulation he was required to be following. The opening sentences in his report state:

The Preliminary Assessment requirements before cleaning Methamphetamine contamination are given in by the Colorado Department of Public Health and Environment Regulations Pertaining to the Cleanup of Methamphetamine Laboratories (6 CCR 1014-3) in Section 4.

The Regulations Pertaining to the Cleanup of Methamphetamine Laboratories (6 CCR 1014-3) expired on December 15, 2014 and were replaced by new revised regulations, which Mr. Boatman was required to follow. It would be difficult to argue the consultant followed the regulations, when the consultant lacked the competency to even correctly identify the regulations he was required to follow

In his report, the consultant states:

We did not observe any chemical storage areas, waste disposal areas, cooking areas, drug paraphernalia, or other evidence of drug use inside the home.

In fact, the photographs provided in the QES report documents several indicators of an illegal drug laboratory that would have been readily identifiable by a consultant who had training in clandestine drug laboratories. The fact that the consultant failed to identify the indicators underscores the inability to comply with the regulations.

Violation of Section 4.0 Preliminary Assessment.

During the performance of a Preliminary Assessment, the Consultant is required by regulations to perform and fulfill specific elements that constitute a Preliminary Assessment. For this project, QES failed to perform those activities. As such, as delineated below, no valid Preliminary Assessment was ever performed for this subject property, and until such time that a valid Preliminary Assessment is performed, no cleaning of the property is permitted.

Violation of Section 4.1

During the performance of a Preliminary Assessment, the Consultant is required by regulations to provide specific mandatory information, including:



4.1 Subject property description, including physical address, legal description, number and type of structures present, description of adjacent and/or surrounding properties, and any other observations made.

In their report, QES failed to provide the required information.

In his report, the consultant identifies the structure as a two unit structure:

The structure is an apartment building. Unit B is a ground floor unit with another apartment above it.

In fact, the structure contains four units, including an attached residence to the South, which the consultant failed to identify and failed to consider for possible contamination migration.

Violation of Section 4.2

During the performance of a Preliminary Assessment, the Consultant is required by regulations to provide specific mandatory information, including:

4.2 Summary of information from review of available law enforcement reports regarding the manufacturing method, chemicals present, cooking areas, chemical storage areas, and areas of contamination, or waste disposal.

Nowhere in the reviewed report has QES documented any attempt to obtain law enforcement documents or ascertain the availability of such documents. Therefore, the locations of pertinent areas within the structure, as may have been identified by law enforcement personnel, have not been provided.

Violation of Paragraph 4.3

According to mandatory State regulations, the consultant is required to include specific information in the Preliminary Assessment including:

4.3 Description of structural features in all buildings, such as attics, false ceilings, crawl spaces, and basements, including:

The QES report states that the subject property has no accessible attic

Unit B did not contain an accessible attic or a basement.

Therefore, the issue regarding the presence of an attic in the building remains unresolved. The regulations require the consultant to determine if the building has an attic; not merely restrict the determination to an “accessible” attic for a particular unit within the building. In fact, nowhere in the regulations is the issue of the accessibility of an attic. In fact, based on the photographs included, it would appear the structure in question does have a attic, and appears to be suitable for entry and storage. In previous property assessments, QES has historically ignored the presence of attics.



Violation of Paragraph 4.3.1 (Attic)

According to mandatory State regulations, the consultant is required to include specific information in the Preliminary Assessment including:

4.3.1 If the building has an attic, a description of the integrity of the building ceiling (i.e., attic floor), any signs of access, storage, manufacturing, or venting into the attic (e.g., holes cut in ceiling for the purpose of venting gases from a cook),

Since QES has failed to identify the attic, it would be impossible for QES to address this provision.

Violation of Paragraph 4.3.1 (Ducting)

According to mandatory State regulations, the consultant is required to include specific information in the Preliminary Assessment including:

4.3.1 ...a description of observations of the ducting associated with all bathroom and kitchen exhaust vents.

The property has various ducts, as evidenced by photographs taken by QES, however, in violation of §4.3.1, there is no description of the bathroom ducts or the kitchen vents or laundry ducting or where these vents go or terminate.

Violation of Paragraph 4.3.2 (Seven Violations)

According to mandatory State regulations, the consultant is required to include specific information in the Preliminary Assessment including:

4.3.2 A description of the integrity of the building floor, and if there is a crawl space, a description of any signs of access, storage, venting, or disposal related to methamphetamine manufacturing, integrity of any vapor barriers, and any signs of disposal onto the soil of the crawl space. ...

QES was required to describe the following:

- Signs of access
- Existence and/or condition of vapor barrier
- Evidence of storage
- Venting (the photographs provided by QES clearly show some kinds of vents)
- Disposal related to methamphetamine manufacturing
- Integrity of any vapor barriers
- Signs of disposal onto the soil of the crawl space

Nowhere in the QES report, do we see where QES has provided any of these descriptions as required by regulations.

Violation of Paragraph 4.5

According to mandatory State regulations, the consultant is required to include specific information in the Preliminary Assessment including:



4.5 Identification of manufacturing methods based on the Consultant's observations and law enforcement reports, if available.

As already documented, there is no evidence that QES attempted to ascertain the availability of or obtain any law enforcement documents. There is no documentation to indicate that the author of the report as ever received any kind of training in illegal drug laboratories or their assessment and therefore would not be expected to possess the necessary skills needed to identify the manufacturing methods or even know of the existence of manufacturing methods.

Indeed, there is no indication that the author of the QES report is an Industrial Hygienist; a mandatory requirement for Authorization to perform assessments of methamphetamine affected properties. Based on previous work by this consultant, Mr. Boatman has exhibited a lack of training and knowledge in the science of Industrial Hygiene. There is nothing in the documentation that would indicate that Mr. Boatman would meet the mandatory qualifications as identified in the Colorado Revised Statutes §24-30-1402 definition of an "Industrial Hygienist."

According to the *Colorado Department Of Regulatory Agencies, Office Of Policy And Research, Industrial Hygienists, And Safety Professionals 2001 Sunrise Review* (October 15, 2001) Mr. M. Michael Cooke, Executive Director stated:

Another avenue of redress is the Colorado Consumer Protection Act. This law prohibits individuals from misrepresenting their certification, abilities, and associations, and making false or misleading statements concerning the price of goods, services, or property. In addition, §6-1-707(1)(a)(I), C.R.S., prohibits an individual from claiming "either orally or in writing, to possess either an academic degree or an honorary degree of the title associated with said degree, unless the person has, in fact, been awarded said degree." While this Act does not prevent individuals from performing industrial hygiene work, it does prohibit individuals from claiming that they have education or background that they do not possess. An individual who misrepresents his or her qualifications may be in violation of this Act. 18 18 § 6-1-105(1)(b), (c), (e) and (I), C.R.S.

It is the opinion of FACTs that this audited report of work performed at 1815 Regal Ct., Unit B, Louisville, CO 80027, demonstrates consultant incompetence, and demonstrates the problems created by the CDPHE when the CDPHE, in violation of Regulations, permitted literally anyone, without any kind of documented training and without any documentation of being an Industrial Hygienist, to perform such assessments.

Since QES made no documented attempts to obtain any pertinent law enforcement documents from appropriate law enforcement agencies, and QES has no documented training in the assessment of illegal drug laboratories, QES could not have complied with this requirement.

Violation of Paragraph 4.6

According to mandatory State regulations, the consultant is required to include specific information in the Preliminary Assessment including:



4.6 Identification of chemicals used, based on the Consultant's observations and knowledge of manufacturing method(s), and if available, identification and documentation of any methamphetamine lab wastes or precursor chemicals discovered at the subject property.

As already described, QES failed to determine the availability of law enforcement documents and there would be no expectation that the consultant would have the necessary professional skills to identify manufacturing methods, if they were present at the property.

Violation of Paragraph 4.7

According to mandatory State regulations, the consultant is required to perform specific tasks including:

4.7 Identification and documentation of areas of contamination. This identification may be based on visual observation, law enforcement reports, proximity to chemical storage areas, waste disposal areas, cooking areas, use areas, or the professional judgment of the Consultant.

As already demonstrated, the consultant failed to ascertain the availability of law enforcement documents and failed to identify those contamination indicators that were present at the property.

If the Consultant determines that assessment sampling is appropriate, such sample collection and analysis shall be conducted in accordance with the assessment level sampling protocols and other requirements of Section 6 of this Part 1.

As described below, the consultant failed to perform such sample collection and analysis in accordance with the assessment level sampling protocols of Section 6. Part 1.

Violation of Paragraph 4.9

According to mandatory State regulations, the consultant is required to perform specific tasks including:

4.9 Identification and documentation of signs of contamination such as staining, etching, or fire damage.

As mentioned above, the consultant has no documented training or specialized knowledge in the assessment of illegal drug laboratories, and therefore, there is no information to indicate the consultant would possess the skills necessary to identify such signs. Nowhere in the report, does QES even mention "fire damage" or that they looked for such or would know what to look for. In fact, the public domain documents contain photographs that clearly show signs of contamination. However, lacking any known training or knowledge of illegal drug lab operations, the consultant failed to recognize those signs for what they were.



Violation of Paragraph 4.11.1 (Two Violations)

According to mandatory State regulations, the consultant is required to perform specific tasks including:

4.11.1 If contamination above the standard is identified in any unit in a multi-unit structure with shared attics (i.e., open space with no fire walls), the shared attic spaces **shall** be investigated to determine whether they are also contaminated. If access is not available to inspect or sample shared attic spaces, the owner of the contaminated unit or their representative shall give notice to the owner(s) of the shared attics and the owners and tenants of the units that are immediately below the shared attic spaces that methamphetamine contamination may be present. Notice shall also be given to the homeowners' association (HOA), if one has been established. The consultant shall document any limitations on access in the final report.

Although contamination was conclusively identified in the Unit, QES failed to inspect the attic (as required), and should have notified the owner, as they were required to

...give notice to the owner(s) of the shared attics and the owners and tenants of the units that are immediately below the shared attic spaces that methamphetamine contamination may be present. Notice shall also be given to the homeowners' association (HOA), if one has been established.

Nowhere in the QES report, do we see where this information has been addressed.

Violation of Section 4.14

During the performance of a Preliminary Assessment, the Consultant is required by regulations to perform specific duties, including:

4.14 Photographic documentation of property conditions, including cooking areas, chemical storage areas, waste disposal areas, and areas of obvious contamination.

Nowhere in the reviewed Preliminary Assessment do we see photographs of the attic.

Violation of Section 4.15

During the performance of a Preliminary Assessment, the Consultant is required by regulations to perform specific duties, including:

4.15 If assessment sampling is conducted, it shall be conducted in accordance with Section 6 of this Part 1. Documentation of assessment sampling shall include:

As discussed below, sampling was not conducted pursuant to the requirements of Section 6 and none of the samples collected were collected pursuant to Section 6 and none of the samples collected by QES were valid, and none may be used for regulatory purposes.

Violation of Section 4.15.3 (Layout of Buildings)

During the performance of a Preliminary Assessment, the Consultant is required by regulations to provide specific information including:

4.15.3 ... a computer generated figure illustrating the layout of the building(s) ...



Nowhere in their report has QES provided a computer generated figure of the layout of the buildings. Nowhere in the QES report is the layout of the buildings(s) given. The QES report only provides a floor plan purporting to be Unit B, but does not include a drawing of layout of the building itself.

Violation of Section 4.17

During the performance of a Preliminary Assessment, the Consultant is required by regulations to provide specific information including:

4.17 If clearance sampling is conducted during the preliminary assessment, it shall be conducted in accordance with Section 6 of this Part 1. Documentation of clearance sampling shall include:

In his report, QES erroneously states:

This was a Methamphetamine Preliminary Inspection. Clearance sampling will be completed at a later date.

And yet, QES performed clearance sampling during the Preliminary Assessment. For example, in their report QES explicitly stated:

The following rooms and locations were found to contain Methamphetamine at concentrations above the trigger limit.

1. Heater, Return Air, Return Air, Supply Air.

In their report, QES only recommended the above for remediation and stated:

The following rooms and locations were found not to contain Methamphetamine at concentrations above the trigger limit.

1. Living Room.

2. Dining Room.

3. Kitchen.

4. Hall.

5. Laundry.

6. Center Bedroom.

7. Master Bedroom.

8. Outer Bath.

9. Inner Bath.

10. Crawl Space.

Therefore, QES cleared those areas with samples; that is, QES performed Clearance Sampling for these areas. According to the regulations:

§4.8 In the case of single-family dwellings, all rooms, attics, crawl spaces, and forced air ventilation systems of all buildings on the subject property must be assumed to be contaminated above the cleanup standards of Section 7, unless sampling conducted in



accordance with the clearance level sampling protocols of Section 6 demonstrates the absence of such contamination in a given room, attic, crawl space, or ventilation system.

Furthermore, QES “cleared” all the major appliances in the structure, without the collection of **any** samples from **any** of the appliances.

Violation of Section 4.17.1 (Two Violations)

During the performance of a Preliminary Assessment, the Consultant is required by regulations to provide specific information including:

4.17 If clearance sampling is conducted during the preliminary assessment, it shall be conducted in accordance with Section 6 of this Part 1. Documentation of clearance sampling shall include:

4.17.1 A description of the sampling procedures used, including sample collection, handling, and QA/QC.

As will be described later, none of the sampling performed at this subject property by QES was performed pursuant to 6 CCR 1014-3 and none of the sampling can be used for regulatory purposes.

Nowhere in their report has QES described their QA/QC, and failed to mention that the QA/QC apparently used by QES failed to meet the State regulation (described later).

Violation of Section 4.17.2

During the performance of a Preliminary Assessment, the Consultant is required by regulations to provide specific information including:

4.17.2 Documentation of the analytical methods used and laboratory QA/QC documentation, including the laboratory analytical report and chain-of-custody documentation.

As described below, QES failed to complete the chain-of-custody as required.

Violation of Section 4.17.4

During the performance of a Preliminary Assessment, the Consultant is required by regulations to provide specific information including:

4.17.4 Documentation of variations from standard practices.

Nowhere in his report for this subject property has QES documented the many deviations and variations from the standard practices (regulations) as identified in this review.

Violation of Section 4.17.5

During the performance of a Preliminary Assessment, the Consultant is required by regulations to provide specific information including:



4.17.5 A certification statement, signed by the Consultant, in substantially the following form:

"I hereby certify that I conducted **clearance sampling** of the subject property in accordance with 6 CCR 1014-3, Part 1, § 6. I further certify that the cleanup standards established by 6 CCR 1014-3, Part 1, § 7 [**choose one**: have/have not] been met as evidenced by testing I conducted."

For this assessment, QES performed clearance testing, however, nowhere in the QES report, does QES certify the clearance sampling.

Review of Section 6 Violations

During the performance of a Preliminary Assessment, the Consultant is required by regulations to follow specific sampling protocols.

Violation of Paragraph 6.1.3

During the performance of a Preliminary Assessment, the Consultant is required by regulations to perform specific duties including:

6.1.3 The following sample collection procedures shall be followed for screening level sampling, preliminary assessment sampling and clearance sampling, except as provided in Section 6.8.2 of this Part 1.

As described below the mandatory elements were not performed as required.

Violation of Paragraph 6.1.3.2

During the performance of a Preliminary Assessment, the Consultant is required by regulations to perform specific duties including:

6.1.3.2. Wipe sampling shall be used to determine the extent of lead contamination on all surfaces at properties whenever the preliminary assessment indicates the phenyl-2-propanone (P2P) method of methamphetamine manufacture was used on the property

As documented earlier in this report, law enforcement documents were not obtained, and therefore, the production process (if any at all) was not determined by the QES.

Furthermore, as already documented, the QES consultant has no documented training in the assessment of illegal drug laboratories (as evidenced by the technical incompetence exhibited by QES as documented in this review) and therefore, there is no expectation that the author of the QES report would possess the necessary skill set to determine if the P2P process was used at the property. Therefore, compliance with this section could not have been met.

Violation of Paragraph 6.1.3.3

During the performance of a Preliminary Assessment, the Consultant is required by regulations to perform specific duties including:



6.1.3.3 Wipe sampling shall be used to determine the extent of iodine contamination whenever there is visible evidence of iodine staining on surfaces that will not be removed

As documented earlier in this report, law enforcement documents were not obtained, and therefore, the production process (if any at all) was not determined by the QES. Furthermore, as already documented, the QES consultant has no documented training in the assessment of illegal drug laboratories and therefore, there is no expectation that the author of the report would possess the necessary skill set to determine what process, if any, was used at the property. Therefore, compliance with this section could not have been met. The available photographs document the potential for iodine contamination, which was entirely overlooked by the untrained QES consultant.

Violation of Paragraph 6.1.3.5

During the performance of a Preliminary Assessment, the Consultant is required by regulations to perform specific duties including:

6.1.3.5 Vapor sampling shall be used to determine the extent of mercury contamination whenever the preliminary assessment indicates the P2P method of methamphetamine manufacture was used on the property.

As already documented, law enforcement documents were not obtained, and therefore, the production process (if any at all) was not determined by the QES. Furthermore, as already stated, the QES consultant has no documented training in the assessment of illegal drug laboratories and therefore, there is no expectation that the author of the report would possess the necessary skill set to determine what process, if any, was used at the property. Therefore, compliance with this section could not have been met.

Violation of Paragraph 6.2.1 (40 Violations - Wipe Aliquots)

During the performance of a Preliminary Assessment, the Consultant is required by regulations to perform specific duties including:

6.2 Discrete Wipe Sample Collection Procedures. The following procedure shall be used for collecting discrete wipe samples:

6.2.1 Sample media shall consist of 2x2 inch wipes made of one of the following:

According to QES in their report:

All the samples were collected using Methamphetamine (sic) sampling wipes moistened with isopropyl alcohol (supplied by Reservoirs Environmental, Incorporated).

The wipes provided by Reservoirs Environmental are **not** compliant with State regulations and may **not** be used for regulatory sampling. It was not the obligation of the analyzing laboratory to supply the correct sampling materials, rather, it was the obligation of QES to use the correct sampling materials in compliance with the regulations.



Therefore the wipes used by QES for sampling are not allowed by regulations. Since none of the sampling media used during the sampling at this subject property was permitted by regulations, none of the samples collected by QES were valid. Since there were 40 individual aliquots, each with the unlawful media, there are 40 violations of this section.

Violation of Paragraph 6.2.1 (40 Media Violations)

During the performance of a Preliminary Assessment, the Consultant is required by regulations to perform sampling pursuant to mandated protocols including:

6.2 Discrete Wipe Sample Collection Procedures. The following procedure shall be used for collecting discrete wipe samples:

6.2.1.1 Cotton gauze material.

6.2.1.2 4-ply non-woven cotton/polyester blend.

6.2.1.3 Tightly knitted continuous filament polyester.

Not only were the size of the pads used by QES not compliant with mandatory regulations, there is nothing in the QES report to indicate that sampling media itself was compliant to the extent that according to Section §6.2.14.9 QES was required to identify the matrix, and failed to do so. As it is, there is nothing in the document to demonstrate QES used required sampling materials.

Since there were 40 aliquots, each with the unlawful media, there are 40 violations of this section.

Violation of Paragraph 6.2.2 (Three Violations)

During the performance of a Preliminary Assessment, the Consultant is required by regulations to perform sampling pursuant to mandated protocols including:

6.2.2 Delineate a 100 cm² area on the surface to be sampled, either by attaching a physical template to the surface (being careful not to touch the area within the template), or by an equivalently reliable and accurate method. The area within the template (i.e., the sample area) shall be 100 cm². Physical templates may not be re-used.

Historically, this consultant has merely held a 100cm² template to a surface, and erroneously believed that they are within the confines of the template are surface, when in fact, the areas within the confines of the template may be empty air.

For example, in another property (731 Excelsior Place, Lafayette, CO 80026) the QES consultant merely holds a template up to a surface that is approximately 50% air (see the photograph below):





And so it was with this property. At least three of the sample locations comprised of approximately 50% air; and if the locations actually were as identified, then it would have been a virtual impossibility to have collected the sample pursuant to §6.2.7 through §6.2.10.

Violation of Paragraph 6.2.2 (36 Template Violations)

During the performance of a Preliminary Assessment, the Consultant is required by regulations to perform sampling pursuant to mandated protocols including:

6.2.2 Delineate a 100 cm² area on the surface to be sampled, either by attaching a physical template to the surface (being careful not to touch the area within the template), or by an equivalently reliable and accurate method. The area within the template (i.e., the sample area) shall be 100 cm². Physical templates may not be re-used.

In their report, QES documented that they did not follow this mandatory protocol when they stated:

*A new 100 sq cm template was **held** to all surfaces for sampling.*

The regulations require the template to be *attached*, since holding a template to a surface with one hand and attempting to wipe the surface with the other allows the template to slip and thus, one cannot know if they actually collected 100 cm². Therefore, the method described by QES in their report cannot meet either requirement of §6.2.2 in that the



template was neither attached as required, nor was it an equivalently reliable and accurate method.

Violation of Section 6.2.7 (36 Violations)

During the performance of a Preliminary Assessment, the Consultant is required by regulations to follow specific sampling protocols including:

6.2.7 Wipe the surface using one of the following methods:

6.2.7.1 Square method: Start at the outside edge and progress toward the center of the surface area by wiping in concentric squares of decreasing size.

6.2.7.2 "S" method: Wipe horizontally from side-to-side in an overlapping "S"- like pattern as necessary to completely cover the entire wipe area.

6.2.8 Without allowing the sample media to come into contact with any other surface, fold the sample media with the sampled side in.

6.2.9 Use the same sample media to repeat the sampling of the same area using the same method. If using the "S" method, the second pass shall be sampled by wiping with overlapping "S"-like motions in a top-to-bottom direction.

6.2.10 Fold sampled side in. Using the same sample media, sample the same area a third time. The third pass shall be sampled by wiping using the method not previously used (i.e., use the square method if the "S" method was originally used).

According to Mr. Richen, with the Boulder County Department of Health, failure to comply with this requirement necessarily invalidates the entire assessment.

In the QES report we see that QES has explicitly documented they did not follow this mandatory sampling protocol:

The "S" method was used to collect the samples in accordance with 6 CCR 1014-3 Part 1, Section 6.2.7 through 6.2.11.

Since there were 36 individual wipes and only the "S" method was employed, each constitutes a violation.

On February 19, 2015, FACTs officially requested a variance from the provisions of §§6.2.7 through 6.2.10, especially where it was physically impossible to comply with this sampling requirement. In her response to our request,⁶ Ms. Brisnehan with the CDPHE explicitly rejected this variance from the regulations:

⁶ February 27, 2015, letter from Colleen Brisnehan, Hazardous Waste Corrective Action Unit, Hazardous Waste Program, to Mr. Caoimhín P. Connell, Forensic Applications Consulting Technologies, Inc., 185 Bounty Hunter's Lane, Bailey, Colorado 80421, RE: Request for Variance under 6 CCR 1014-3, 788 West Lois Court, Louisville, Colorado, cc: Mr. Dan Miller - Colorado Attorney General Office, Michael Richen - Boulder County Public Health



The Regulations, as amended, merely add a third pass to increase sample recovery. The sample collection procedure included in the Regulations is based on wipe sample collection procedures developed by the Occupational Safety and Health Administration (OSHA) and the National Institute for Occupational Safety and Health (NIOSH). The sample collection procedure using the "S" method is also referenced in the NIOSH analytical methods for methamphetamine.

The Department does not consider the deviations proposed by FACTs to be *de minimis* variations from standard sampling requirements. The Department is not willing to provide FACTs a "blank check" to determine when it will or will not comply with the sample collection requirements. Therefore, the Department has determined that approval of this variance may result in substantial deviation from the intent of the regulatory requirement. This variance request is denied.

Based on the February 27, 2015, letter from Ms. Brisnehan (CDPHE,) the method used by QES at the subject property is prohibited, and therefore, ALL of the samples thus collected by the QES consultant are invalid.

Violation of Paragraph 6.2.14

According to mandatory State regulations, the consultant is required to include specific information in the Preliminary Assessment including:

6.2.14 Maintain a Chain-of-Custody Record covering the time of sample collection through final disposition. Document sample(s) collected from a single methamphetamine-affected property on one Chain-of-Custody Record. Every transfer of custody shall be noted and signed for and a copy of the record shall be kept by each individual who has signed it. Samples shall be sealed, labeled, and secured. All samples collected shall be transported directly to the laboratory. Shipping samples overnight is considered direct transport, and the shipping label shall be considered part of the Chain-of-Custody Record. Retain all sample documents for the project record and include them in the project reports. At a minimum, the Chain-of-Custody Record shall include the following:

Violation of Paragraph 6.2.14.2 (Fail to Identify Situs)

According to mandatory State regulations, the consultant is required to include specific information in the Preliminary Assessment including:

6.2.14.2 subject property address;

The chain-of-custody provides only a partial address. The situs location contains at least four separate units; QES has failed to identify which of the four units the submission represents.

Violation of Paragraph 6.2.14.3 (Failed to Identify Sampler)

According to mandatory State regulations, the consultant is required to include specific information in the Preliminary Assessment including:

6.2.14.3 sampler name and contact information;

Nowhere on the chain-of-custody is the mandatory information included. Nowhere on the chain-of-custody has the sampler been identified.



Violation of Paragraph 6.2.14.6 (10 Violations- Number of Aliquots)

According to mandatory State regulations, the consultant is required to include specific information in the Preliminary Assessment including:

6.2.14.6 number of sample aliquots;

This information is missing for 10 samples on the chain of custody.

Violation of Paragraph 6.2.14.7 (10 Violations- Number of Containers)

According to mandatory State regulations, the consultant is required to include specific information in the Preliminary Assessment including:

6.2.14.7 number of containers for each sample;

This information is missing for 10 samples on the chain of custody.

Violation of Paragraph 6.2.14.9 (10 Violations- Matrix)

According to mandatory State regulations, the consultant is required to include specific information in the Preliminary Assessment including:

6.2.14.9 sample matrix;

This information is missing for 10 samples on the chain of custody.

Violation of Paragraph 6.2.14.11

According to mandatory State regulations, the consultant is required to include specific information in the Preliminary Assessment including:

6.2.14.11 sample preservatives, if applicable; and

This information is missing from the chain-of-custody.

Violation of Section 6.3.6

During the performance of a Preliminary Assessment, the Consultant is required by regulations to follow specific sampling protocols including:

6.3.6 Collect all individual aliquots from 100 cm² sampling areas.

As already documented above, QES failed to use a reliable method to delineate the sample locations and cannot state with any degree of accuracy that QES collected 100 cm² for each of the samples.



Violation of Paragraph 6.5

According to mandatory State regulations, the consultant is required to perform the sampling pursuant to specific protocols including:

6.5 Vapor Sample collection procedures. If the preliminary assessment indicates the phenyl-2-propanone (P2P) method of methamphetamine manufacturing was used, vapor samples for mercury shall be collected in accordance with the procedures for sample collection described in NIOSH Method 6009 as incorporated in Section 9 of this Part 1.

As already documented, there is no evidence that QES attempted to ascertain the availability of or obtain any law enforcement documents, and there is no documentation to indicate that the author of the report has ever received any kind of training in illegal drug laboratories or their assessment and therefore would not be expected to possess the necessary skills needed to identify if a P2P process had occurred. Therefore, since QES does not address the process, or even describe how or why the contamination was present, it remains possible that a P2P process occurred in the property, and the issue remains unresolved.

Violation of Paragraph 6.9

According to mandatory State regulations, the consultant is required to perform the sampling pursuant to specific protocols including:

6.9 Clearance level sampling protocols for buildings and personal property. The Consultant **shall** conduct clearance level sampling of any subject property that meets the definition of a methamphetamine-affected property, or that is suspected of being a methamphetamine-affected property as provided in Sections 3.2, 3.3 or 3.4 of this Part 1, to verify that cleanup standards have been met. ...

As demonstrated below, QES failed to meet the mandatory provisions.

Violation of Paragraph 6.9.1

According to mandatory State regulations, the consultant is required to perform the sampling pursuant to specific protocols including:

6.9.1 Except as provided in Section 6.9.1.1, at least 400 cm² of surface area shall be sampled from every room, attic, and crawl space.

In the QES report, there is no indication that 400 cm² was collected from the attic.

Violation of Paragraph 6.9.7 (Six Violations)

According to mandatory State regulations, the consultant is required to perform the sampling pursuant to specific protocols including:

6.9.7 The interior of major appliances (microwaves, refrigerators, freezers, ovens, and dryers) **must** be sampled using **discrete** samples.

Although the QES photographs clearly demonstrate the presence of major appliances, none of the appliances were addressed in the Preliminary Assessment.



The QES photographs include:

- 1) Clothes Washer
- 2) Clothes dryer
- 3) Stove
- 4) Microwave oven
- 6) Kitchen refrigerator

Violation of Paragraph 6.9.11.1

According to mandatory State regulations, the consultant is required to perform the sampling pursuant to specific protocols including:

6.9.11.1 Areas expected to have the highest levels of contamination, such as cooking areas, chemical storage areas, and waste disposal areas.

Since QES has no documented training in the assessment of illegal drug laboratories, QES was unaware of the fact that virtually all of his samples were collected from areas expected to have the lowest levels of contamination (for example, middle of walls).

Colorado Consumer Protection Act

In Colorado, consumers are protected against deceptive trade practices as delineated in the Colorado Consumer Protection Act, CRS Title 6, Article 1. According to those statutes, a person engages in a deceptive trade practice when, in the course of such person's business or occupation, that person knowingly makes a false representation as to the certification of their services, and/or knowingly makes a false representation as to the characteristics of their services and/or represents their services are of a particular standard, quality, or grade if he knows or should know that they are not as specified.

We believe that Mr. Boatman (QES) has violated the Colorado Consumer Protection Act, and as a result, the registered owner of this subject property (and several others named in previously audited QES reports), and the general public, have been harmed.

We recommend that the situation be forwarded to the District Attorney for proper evaluation, and to determine if the case rises to the level of criminal conduct.

CONCLUSION

For this regulatory audit, FACTs has identified no fewer than 234 total individual regulatory violations in the Preliminary Assessment portion (grouped into approximately 34 broader regulatory categories), and, as described elsewhere, 90 individual regulatory violations in the "Screening Level Assessment" portion.



Appendix A

Reviewer's Statement of Qualifications





Forensic Applications Consulting Technologies, Inc. Consultant Statement of Qualifications

FACTs project name:	Web	Form # ML15
July 9, 2015		

Caoimhín P. Connell, has been involved in clandestine drug lab investigations since 2002 and meets the Colorado Revised Statute §24-30-1402 definition of an "Industrial Hygienist" and is authorized under 6 CCR 1014-3 to perform assessments in illegal drug laboratories. He has been a practicing Industrial Hygienist since 1987. Mr. Connell is a recognized authority in drug-lab operations and is a Certified Instructor in Meth-Lab Safety through the Colorado Regional Community Policing Institute, CRCPI (Colorado Division of Criminal Justice) and was the lead instructor for the CRCPI providing over 260 hours of methlab training for over 45 Colorado Law Enforcement Agencies, federal agents, probation and parole officers throughout Colorado judicial districts. He has provided meth-lab lectures to the US Air Force, the National Safety Council, and the American Industrial Hygiene Association (of which he is a member and serves on the Clandestine Drug Lab Work Group and for whom he conducted the May, 2010, Clandestine Drug Lab Course, and is a coauthor of the AIHA methlab assessment publication.)

Mr. Connell is a member of the American Conference of Governmental Industrial Hygienists, the Occupational Hygiene Society of Ireland, the Colorado Drug Investigators Association, an appointed Member of the National Fire Protection Association, and the ASTM International Forensic Sciences Committee, (where he was the sole sponsor of the draft ASTM E50 *Standard for the Assessment of Suspected Clandestine Drug Laboratories*).

From 2009, Mr. Connell served as the Industrial Hygiene Subject Matter Expert on the Federally funded Interagency Board (Health, Medical, and Responder Safety SubGroup), and was elected full member of the IAB-HMRS in 2011 where he now serves. He is the only private consulting Industrial Hygienist in Colorado certified by the Office of National Drug Control Policy High Intensity Drug Trafficking Area Clandestine Drug Lab Safety Program, and P.O.S.T. certified by the Colorado Department of Law.

He has received over 194 hours of highly specialized law-enforcement sensitive training in drug lab operation, and under supervision of the US DEA, he has manufactured methamphetamine using a variety of street methods. He has received highly specialized drug lab assessment training through the Iowa National Guard, Midwest Counterdrug Training Center and the Florida National Guard Multijurisdictional Counterdrug Task Force, St. Petersburg College, Rocky Mountain HIDTA, as well as through the US NHTSA, and the U.S. Bureau of Justice Assistance (US Dept. of Justice) and he is currently ARIDE Certified.

Mr. Connell is a current sworn law enforcement officer who has conducted clandestine laboratory investigations and performed risk, contamination, hazard and exposure assessments from both the law enforcement (criminal) perspective, and from the civil perspective in residences, apartments, motor vehicles, and condominiums. Mr. Connell has conducted over 594 assessments of illegal drug labs in CO, SD, NE, OK, and collected over 5,378 samples during assessments (a partial detailed list of drug lab experience is available on the web at): <http://forensic-applications.com/meth/DrugLabExperience2.pdf>

He has extensive experience performing assessments pursuant to the Colorado meth-lab regulation, 6 CCR 1014-3, and was an original team member on two of the legislative working-groups which wrote the original regulations for the State of Colorado and he was the primary contributing author of Appendix A (*Sampling Methods And Procedures*) and Attachment to Appendix A (*Sampling Methods and Procedures Sampling Theory*) of the original Colorado regulations. Mr. Connell strongly objected to the unscientific, unfounded and inappropriate amendments now applicable to those original regulations.

Recommended by the US NIOSH as Peer Review Expert for the NIOSH 9109 Method, *Methamphetamine*, he has been admitted as a drug lab expert in Colorado, and an Industrial Hygiene Expert in Colorado in both civil and criminal courts as well as Federal Court in Pennsylvania. He has provided expert testimony in several criminal cases including Grand Jury testimony and testimony for US Bureau ATF and he testified before the Colorado Board of Health and Colorado Legislature Judicial Committee regarding methlab issues. Mr. Connell has provided services to private consumers, Indian Nations, State Investigators, and Federal Investigators.



Multijurisdictional Counterdrug Task Force Training

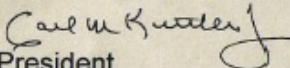


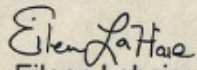
This is to certify that
Caoimhin P. Connell

Has satisfactorily completed the following 24 hour MCTFT training course held at
DIVIDE, CO

Rural Patrol

Training held 9/27/2004 through 9/29/2004


President
St. Petersburg College


Eileen Lahaie
MCTFT Director

A partnership between The Florida National Guard and St. Petersburg College

Midwest Counterdrug Training Center



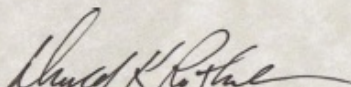
Certificate of Training

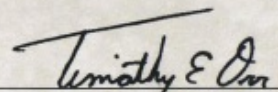
This certifies that

Caoimhin Connell

Has successfully completed the
Clandestine Laboratory Certification

Cheyenne, WY
40 Training Hours
2-6 August 2004


Network Environmental Systems, Inc.


LTC Timothy E. Orr
Commandant



Center *for* Task Force Training™

THIS IS TO CERTIFY THAT

Caoimhin P. Connell

HAS SUCCESSFULLY COMPLETED 20 HOURS OF TRAINING IN

METHAMPHETAMINE INVESTIGATION MANAGEMENT

MARCH 20-22, 2006

DENVER, COLORADO

Domingo S. Herraiz
Director, Bureau of Justice Assistance

Training coordinated by the
Institute for Intergovernmental
Research® on behalf of BJA



State and Local Anti-Terrorism Training

THIS IS TO CERTIFY THAT

Caoimhin P. Connell

HAS SUCCESSFULLY COMPLETED AN 8-HOUR
STATE AND LOCAL ANTI-TERRORISM TRAINING PROGRAM
NARCOTICS TASK FORCE ANTI-TERRORISM BRIEFING

June 1, 2006

Denver, Colorado

Domingo S. Herraiz
Director, Bureau of Justice Assistance



Training coordinated on behalf of BJA
by the Institute for Intergovernmental Research

*Rocky Mountain
High Intensity Drug Trafficking
Area*



Certifies that



Caoimhín Connell

has attended

4 hours of

Hash Oil Extraction: The Scene and The Patient

Aurora, CO

July 25, 2014

Training Manager, Rocky Mountain HIDTA

Director, Rocky Mountain HIDTA



www.nesglobal.net

Certificate of Completion

Caoimhin Connell

has successfully completed training in

Advanced Clan Labs: Beyond the Basics

presented by

NES, Inc.

1141 Sibley Street Folsom, CA 95630

Instructor - Brian Escamilla

04/28/14 04/30/14

Date

Contact Hours:24

This certifies that

Caoimhin P Connell

Has met the requirements for the online course

Expert Testimony Training for the Prosecutor and Scientist



11-07-2012

Certificate Number: 1109778763

For more information please visit <http://www.rti.org/forensiced>



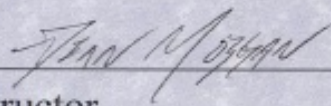
**Park County Sheriff's Office
Certificate of Completion**

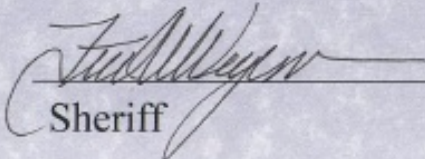
Caoimhin Connell

has completed an 8 hour course in:

Crime-scene Approach and Evidence Collection

Completed this 29th day of April, 2009


Instructor


Sheriff

***Rocky Mountain
High Intensity Drug Trafficking
Area***



Certifies that



Caoimhín P. Connell

*has attended
2 hours of
Hash Oil Explosions
Woodland Park, CO
May 31, 2014*

Training Manager, Rocky Mountain HIDTA

Director, Rocky Mountain HIDTA

Certificate of Completion

This Will Certify That

Caoimhín P. Connell

Successfully Completed

Prescription Drug Crimes

7 Hours Completed

At: CO Law Enforcement Officers Assn. On: September 30, 2010
Greeley, Colorado

P. Ritch Wagner
Instructor



Director, Law Enforcement Liaison & Education



Certificate of Training

This is to certify that
Caoimhin Connell

(Name)

Park County Sheriff's Office

(Agency)

If the bearer of this document possesses a 40 Hour certificate pursuant to 29 CFR §1910.120, this certifies the above named has met the refresher training requirements of 29 CFR §1910.120(e)(8) and is hereby **RECERTIFIED** in Clandestine Laboratory Safety / HazWoper

Sponsored by
Rocky Mountain High Intensity Drug Trafficking Area
Colorado Regional Community Policing Institute

Caoimhin P. Connell 4/12/10
Caoimhin P. Connell, Instructor/Date
Glean HARDEY



Colorado Law Enforcement Officers' Association



This is to certify that

CAOIMHIN CONNELL

Completed **ARIDE (Advanced Roadside Impaired Driving Enforcement)**

hosted by **Loveland Police Department**

on **February 28 – March 1, 2011**

Tom Finelle
Tom Finelle, CLEOA President

M. A. [Signature]
ARIDE Instructor

State of Colorado



THE BOARD ON PEACE OFFICER STANDARDS AND TRAINING
HEREBY AWARDS THIS CERTIFICATE
AS INSPECTOR OF VEHICLE IDENTIFICATION NUMBERS
TO

CAOIMHIN PADRAIG CONNELL

August 27, 2008

Date

VIN INSP— **0952**

Number

For fulfilling the prescribed requirements as an Inspector of Vehicle Identification Numbers and as a peace officer in Colorado, pursuant to Title 42, Article 5, Section 206 Colorado Revised Statutes.

Bill Ritter Jr.

Governor

John W. Suthers

Attorney General, Board Chairperson

Certificate of Completion Intoxilyzer 9000 Operator Certification Course

*The Evidential Breath Alcohol Testing Program of the
Colorado Department of Public Health and Environment certifies that*

Caoimhin P Connell

User ID: **841645**

*has successfully completed the "Intoxilyzer 9000 Operator Certification Course"
to determine the alcohol concentration in breath specimens pursuant to the
State Board of Health Rules Pertaining to Testing for Alcohol and Other Drugs (5 CCR 1005-2)
Training was provided by the Evidential Breath Alcohol Testing Program
of the Colorado Department of Public Health and Environment.*

February 21, 2013

Certificate Date

Jeffrey A. Groff

Jeffrey A. Groff, Program Manager
Evidential Breath Alcohol Testing Program



David A. Butcher

David A. Butcher, Director
Laboratory Services Division
Colorado Department of Public Health
and Environment

Certification expires 180 days from certificate date. Recertification must be per 5 CCR 1005-2.



Certificate of Achievement

awarded to:

Caoimhin P. Connell

Has successfully completed Methamphetamine Lab Cleanup Management and Supervision training in accordance with 29 CFR 1910.120 and State Regulations Pertaining to the Cleanup of Methamphetamine Laboratories (8Hrs.)

June 1st, 2005

Date

Signed

HAZMAT Plans & Programs, Inc. 30 S. Havana St. Suite 304F Aurora, Colorado 80012 (303) 360-9801
"Safety Plans, Programs and Training Tailored To The Needs Of Your Business"

CERTIFICATE OF COMPLETION

COLORADO LAW ENFORCEMENT ASSOCIATIONS TRAINING PROJECT

This Certifies That

Caoimhin Connell

Has Attended the

CLEAT 40-HOUR

Train the Trainer Course

Hosted by Breckenridge Police Department
August 14-18, 2006

Karen M. Renshaw, CAE
Executive Director
Colorado Association of Chiefs of Police

John L. Kammerzell
Executive Director
Police Officer Standard & Training

Donald E. Christensen
Executive Director
County Sheriffs of Colorado



COLORADO AUTO THEFT INVESTIGATORS



SINCE 1973

This is to certify that

Caoimlin P. Connell

Has completed a 24 hour training program in Vehicle Identification Number
Inspection

Presented this 24th day of May, 2008

CATI President

VIN Inspector Training Coordinator

State of Colorado



THE BOARD ON PEACE OFFICER STANDARDS AND TRAINING
AWARDS THIS CERTIFICATE
TO

CAOIMHIN PADRAIG CONNELL

May 6, 2004

Date

B- 10670

Number

For fulfilling the prescribed requirements for certification. This certificate expires three years from date of issuance unless the certificate holder meets the requirements for continued certification as established by law and the P.O.S.T. Board.

Governor

Attorney General, Board Chairperson

**Rocky Mountain
High Intensity Drug Trafficking
Area**



Certifies that



Caoimhín Connell

has attended

16 hours of

MCTC / RMHIDTA Indoor Marijuana Grows

Centennial, CO

August 28-29, 2014

Training Manager, Rocky Mountain HIDTA

Director, Rocky Mountain HIDTA

CERTIFICATE OF TRAINING

THIS IS TO CERTIFY THAT

Caoimhín Connell

Has completed 4 hours of successful training for

The Hazards of Hash Oil Extraction

Held at IRIS Fire Investigations in Englewood, CO

on this 7th day of November, 2014

Robert K. Toth
IRIS Fire Investigations, President



COLORADO
Department of Public
Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

December 30, 2014

Caoimhin Connell
Forensic Applications Consulting Technologies Inc
185 Bounty Hunter Ln
Bailey, CO 80421

Consultant Interim Authorization Approval

Dear Caoimhin Connell:

The Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment (the Department) has reviewed the application for Consultant Interim Authorization and has determined the application to be complete and in compliance with 6 CCR 1014-3, Regulations Pertaining to the Cleanup of Methamphetamine-Affected Properties (the Regulations).

The Department approves the application for **Consultant Interim Authorization**. This interim authorization approval shall expire on June 15, 2015.

Assessment and sampling of methamphetamine-affected properties may only be conducted by Consultant Firms that have received interim authorization under Part 2, Section 3.2.4 of the Regulations. Therefore, this interim authorization may only be used to conduct assessment and sampling of methamphetamine-affected properties for a Consultant Firm that has received interim authorization approval from the Department.

Approved By: _____

Date: _____

12/30/2014





COLORADO
Department of Public
Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

December 30, 2014

Forensic Applications Consulting Technologies Inc
185 Bounty Hunters Ln
Bailey, CO80421

Consultant Firm Interim Authorization Approval

Dear Forensic Applications Consulting Technologies Inc:

The Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment (the Department) has reviewed the application for Consultant Firm Interim Authorization and has determined the application to be complete and in compliance with 6 CCR 1014-3, Regulations Pertaining to the Cleanup of Methamphetamine-Affected Properties (the Regulations).

The Department approves the application for **Consultant Firm Interim Authorization**. The firm shall only utilize individuals who have received interim authorization under Part 2, Section 3.2.1 of the Regulations to conduct assessment and sampling of methamphetamine-affected properties. This interim authorization approval shall expire on June 15, 2015.

The Regulations require submittal of electronic copies of reports to the Department. Electronic copies of reports should be submitted via email to cdphe_methlabdocuments@state.co.us. The words "report" or "report submittal" should be included in the email subject line, and the property address should be included in the body of the email.

Alternatively, compact disks with electronic copies of reports may be mailed to:

Colorado Department of Public Health and Environment
Hazardous Material and Waste Management Division
4300 Cherry Creek Drive South
Denver, CO 80246-1530
Attn: Colleen Brisnehan or Richard Mruz

Packages may also be hand delivered to the Department's mail room located in the northwest corner of Building B (700 South Ash Street).

Approved By: _____

Date: 12/30/2014

