



FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.

August 10, 2015

Don Roybal
Maintenance Supervisor
Boulder County Housing Department
PO Box 471
Boulder, CO 80306

RE: 769 Cleveland Circle, Lafayette, CO 80026

Dear Mr. Roybal:

We have reviewed the August 7, 2015 letter from Mr. Richen regarding the property located at 769 Cleveland Circle, Lafayette, CO 80026.

In the past, Mr. Richen has expressed his confusion regarding particular State regulations and therefore, we are happy to help provide some clarification here.

Essentially, none of the issues raised by Mr. Richen in his letter are actually issues at all, but rather stem from Mr. Richen’s confusion.

ISSUE 1

Issue 1: The report of a positive Field Blank (CM030215-04, result of 0.32 micrograms per sample) was not resolved in the report. A positive blank result should be resolved in the report since the result may indicate cross contamination problems with other samples. [Part 1 Section 6.12.8 and Section 9 “USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review, Office of Superfund Remediation and Technology Innovation, United States Environmental Protection Agency, OSWER 9240.1-48, USEPA-540R-08-01 (June 2008).”]

Response 1:

This is actually just an error on Mr. Richen’s part. In our report, we extensively discuss the issue of the field blank. In fact, even within the Table of Contents (Page 2) of our report, we identify where the discussion occurs:

Methamphetamine Analysis	20
QA/QC Precautions	20
Field Blanks	20
Field Spikes	21
Cross Contamination	21

Beginning on Page 20, we discuss the blanks in detail in the context of pertinent standards and regulations; the discussion continues into Page 21. In that discussion, we point out that the new regulations make requirements that are contrary to good, normal, established Industrial Hygiene practices, and are contrary to established environmental sampling protocols.

When I wrote the language for the original regulations, I was very explicit in the use and purpose of the blanks, which were specifically identified as a “media blank.” During the recent revision of these regulations, the private sector members of the stakeholders committees did not know the difference between a “media blank” and a “field blank” and we got stuck with bad-science regulations.

In his comments, Mr. Richen references the US EPA guidance document (USEPA-540-R-08-01 June 2008); this document is titled “USEPA *Contract Laboratory Program* National Functional Guidelines for Superfund Organic Methods Data Review”

I used to be a Chemist with the USEPA’s *Contract Laboratory Program* where it was my job to establish QA/QC programs for the various laboratories; carry out and confirm the Quality Assurance/Quality Control (QA/QC) provision on 1) an instrument level, 2) a method level and 3) final “Data Validation” on the final data for submission to the US EPA as part of the data package for both USEPA CLP SAS and USEPA CLP RAS analysis packages. (To my knowledge, I was the only private consultant present during the revision rule-making processes with this kind of experience). During the rule-making process, I objected to the proposed blank requirements and proposed QA/QC provisions pointing out that the proposed rules would likely lead precisely to these problems (as discussed in our closeout report), and that the regulations required no resolution to the issue if problems were encountered.

Under the old State regulations, the Industrial Hygienist was required to resolve these issues for their data – under the new regulations, there are **no** resolutions required, instead, the Industrial Hygienist is prohibited from using the QA/QC data for interpretation of results (see for example: 6 CCR 1014-3 §3.7.6.3, §4.15.3, §4.17.3, §8.5). Under the new regulations, the Consultant is only required to *describe* the QA/QC (See §3.7.6.1, §4.15.1, §4.17.1, §8.3): which is precisely what we did in our report.

Contrary to Mr. Richen’s impressions, in our report, we fully complied with the regulations, by describing the blanks and the QA/QC thusly:

Field Blanks

Field blanks were collected and submitted for analysis pursuant to the requirements of the regulations. Under normal established, standard environmental sampling protocols, there are various types of “blanks.” The purpose of a field blank is to determine if the sampling materials and the handling procedures contributed to the presence of any contaminant identified. According to State regulations (Section 6.2.12.1), however, the Consultant is *required* by regulations to intentionally expose the blank to potential contamination. Reason notwithstanding, the regulations read:

6.2.12.1 To collect a field blank, remove a wipe from the wrapper with a new glove, shake the wipe open, refold in the same manner as during the sampling procedure, and then insert the wipe into the sample container.

(The State never explained “wrapper” or how this “wrapper” exists, or how the blank material became “wrapped.”)

As such, if contamination is identified in the field blanks there is no way to know if the contamination in the blank is due to tainted sampling materials, or if the reported



contamination is the result of contamination of the material as it was being exposed while being opened in a contaminated property and waving the sampling material around in potentially contaminated air.

Similarly, pursuant to State regulations, the Consultant is required to make the 11th sample and every 10th sample thereafter and the last sample of the collection suite a field blank. As such the ability to submit surreptitious blanks to check the laboratory's abilities is lost.

Therefore, our description is in full compliance with Colorado 6 CCR 1014-3 as well as compliant with the referenced OSWER *Contract Laboratory Program* National Functional Guidelines for Data Review which states:

9. If contaminants are found in the storage, field, or trip blanks, the following is *recommended*:

II. If the analyte was not present in the method blank, the source of contamination may be in the storage area, in the field, or during sample transport. Consider all associated samples for possible cross-contamination.

Very clearly, as described in our report, we considered the issue when we stated:

As such, if contamination is identified in the field blanks there is no way to know if the contamination in the blank is due to tainted sampling materials, or if the reported contamination is the result of contamination of the material as it was being exposed while being opened in a contaminated property and waving the sampling material around in potentially contaminated air.

Mr. Richen mentions his concern for “cross-contamination.” However, clearly, this is not a “cross contamination” issue since:

- A) None of the other field blanks contain measureable concentrations of methamphetamine
- B) Several samples collected from the field such as CM040915-12, CM040915-09, CM042715-06, did not contain measurable concentrations of methamphetamine. (If cross-contamination was occurring in a property for which there was even a single positive sample, none of the other samples could be below the reportable limit for the analyte.)
- C) The field blanks, as required by regulations, would be incapable of speaking to the issue of cross-contamination.

To our knowledge (as supported by records obtained under the Colorado Open Records Act), FACTs is the only Industrial Hygiene firm that actually complies with the regulatory QA/QC provisions. That is, if Mr. Richen is going to reject our report based on this “issue,” then he would need to reject every report submitted to him under 6 CCR-1014-3, since our review of the CORA records indicates that NO consultant, except FACTs, actually complies with this regulatory requirement.

Finally on this issue – public records obtained through CORA indicate that although several contractors have reported field blank contamination, and those contractors never even discussed the QA/QC or the fact their blanks were contaminated, the Colorado Department of Public



Health and Environment (CDPHE) has, without exception, allowed the issue to pass. (See for example our discussion regarding the 229 violations associated with the assessment performed at 1138 32nd Street, Unit 201, Denver, Colorado 80205, a copy of which may be downloaded from <http://www.forensic-applications.com/meth/coloregs.html>)

ISSUE 2

Issue 2: There was no discussion as to the disposition of the medicine cabinet, sample [CM040915-04] which had a result of 0.90 micrograms per 100 centimeters squared (cm²). Was the cabinet washed or disposed? [Part 1 Section 7.1]

RESPONSE 2:

This statement is a puzzlement. If the above were true, it would be a non-issue. The “issue” is the result of Mr. Richen’s apparent confusion. Mr. Richen referenced Paragraph §7.1 which states:

7.1 The methamphetamine concentration of any sample shall not exceed 0.5 µg /100 cm², except as provided in Sections 7.1.1 and 7.1.2 below.

Once the results for the surface of the Common Bath were identified as being non-compliant, FACTs rejected the entire room, as required, and the contractor re-cleaned the entire room and every surface within the room, as required. We very clearly stated that fact in our report:

Between April 16, 2015, and April 23, 2015, Excel Environmental isolated the compliant foyer, master bedroom and master bathroom and the compliant upstairs portion of the residence, as well as the compliant downstairs bedroom, from the noncompliant areas and under negative pressure, performed additional decontamination activities at the subject property.

Therefore, the *entire* bathroom containing the cabinet was recleaned, and the entire room was subjected to final verification sampling. It would appear that M. Richen is under the belief that if a surface in a room is found to be non-compliant, then only that specific surface must be addressed. In fact, the surface from which a sample is collected is merely a representation of ALL surfaces in that room (with the following exceptions). Only very rarely, and in the case of appliances or ventilation surfaces (for example) is a sample designed to represent a single item (and then, if it is, the selected surface is representative of that item as an whole). For example, if an interior shelf of a refrigerator is sampled and found to be noncompliant, the contractor can’t just discard that particular shelf and claim compliance – the contractor would be required to address the entire interior of the appliance. Similarly, in this case – in full compliance with the regulations -- a surface within a room was selected to represent that room. That surface indicated the room (as represented by the surface) was noncompliant, and the entire room was recleaned. It is for that reason, in our report we stated:

Between April 16, 2015, and April 23, 2015, Excel Environmental isolated the compliant foyer, master bedroom and master bathroom and the compliant upstairs portion of the residence, as well as the compliant downstairs bedroom, from the noncompliant areas and under negative pressure, performed additional decontamination activities at the subject property.



The downstairs bathroom was recleaned in its entirety, and, as required by regulations, was subjected to post-remediation verification sampling. That sample indicated compliance of the room, and therefore, compliance of all surfaces remaining in that room (unless the surface is a ventilation surface, etc). The compliance status of the room is documented in several places in our report, including the following:

Room #	Description	Cleared with	Result
1	Foyer Hall and Stairs	CM040915-01	0.09
2	Master Bedroom and closet	CM040915-02	0.07
3	Master bathroom	CM040915-03	0.15
4	Common bathroom	CM042715-04	0.16

There is no requirement in the regulations to return to the exact same surface and re-sample that same surface during verification of a room that has failed; there is no requirement to specifically address the existence or fate of every surface in the property from which a sample has been collected.

If Mr. Richen has problems with the decontamination *per se*, and documentation of decontamination, *per se*, then he should put those questions to the decontamination contractor (in this case, Excel Environmental). FACTs has no regulatory obligations, vis-à-vis the decontamination contractor, or their activities, and neither does FACTs have any control over the clean-up contractor or their document submittals. If there are such deficiencies in the clean-up descriptions, then we respectfully suggest that Mr. Richen contact the appropriate personnel with Excel Environmental for additional information.

ISSUE 3

Issue 3: I do not think it is possible to sample a 100cm² area from these items. [Part 1 Sections 6.2.2; 6.3.6]

- Tops of door frames samples CM040915-01; CM0040915-05
- Top of light fixture CM0040915-02
- On a sub-basement gas line CM042715-05

[Part 1 Part 1, Section 2 Definitions for "Composite sample" and "Composite sample result", and Part 1 Sections 6.2.2, 6.3.6, 6.3]

RESPONSE 3:

This appears to be a statement about Mr. Richen's personal belief system, and not a regulatory or sampling issue. The referenced rubrics (6.2.2; and 6.3.6) state:

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.

6.3.6 Collect all individual aliquots from 100 cm² sampling areas.

FACTs fully complied with both referenced rubrics. Nothing in Mr. Richen's letter indicates that there was any question about compliance with these provisions, but rather Mr. Richen's



apparent personal belief system. The documentation we provided with our report very clearly and very explicitly identifies the individual sampling dimensions for the samples referenced by Mr. Richen. Mr. Richen references our sample “CM0400915-01;” so let’s take a look at that sample. Our report very clearly and very explicitly identifies individual sampling area dimensions as 1.5 cm X 66.7 cm. When we do the math we see:

$$1.5 \text{ cm} \times 66.7 \text{ cm} = 100 \text{ cm}^2$$

And that is exactly the area we sampled. In compliance with State regulations, we did that for each of the four individual wipes collected. That Mr. Richen doesn’t “believe” that 1.5 cm by 66.7cm is 100 cm² is a belief FACTs does not have the ability to correct. It is possible that Mr. Richen is more familiar with the sampling protocols of untrained consultants, who habitually use a 10X10 template and pretend that if one holds the template over an item, then the sample area is magically 100 cm²; (when in fact the actual surface area is not even close to 100 cm²).

A good example of this actually occurred in the property adjacent to the subject property under discussion. Public records obtained through CORA demonstrate that an untrained consultant (with a long history of invalid and fraudulent assessments) performed work in the adjoining property (771 Cleveland Circle, Lafayette, CO 80026). During a review of this invalid assessment, the untrained consultant merely holds a template over an item to collect a wipe sample and reports the area as 100 cm² even though the area within the template may be empty space and not contain a surface at all.

In the first photograph below, the consultant holds the template over an area that is approximately 50% empty space, and collected a sample from an area that is actually only about 60cm² (it is also interesting to note that the photograph documents the fact the consultant was violating regulation§6.2.2 by re-using his templates, and selecting areas from which it is impossible to comply with the sampling requirements found in §6.2.7.1 and required by § 6.2.10).





Several other such photographs are discussed in our review of that work wherein we identified no fewer than 55 regulatory violations.¹

Such use of templates is the normal protocol used by untrained consultants who fail to understand the objective of sampling and indeed the objective of using a template in the first place. Mr. Richen has expressed concern for “cross-contamination,” and in the above example, Mr. Richen would be correct to point out true “cross-contamination” since the untrained consultant is placing the exact same template on different surfaces, thus “cross-contaminating” the surfaces as he moves from one surface to the next. (That is why the practice is explicitly prohibited by regulations).

In any event, contrary to common belief, the use of templates is not required, and as demonstrated in the above photograph, such inappropriate use results in inappropriate (and unlawful) sample collection. The public records don’t indicate if Mr. Richen issued a similar rejection letter to the owner of 771 Cleveland Circle, Lafayette, CO 80026 regarding the illegal assessment at that property from which this photograph was taken. If such a letter has not been

¹ Regulatory Audit of Preliminary Assessment Report By Robert Woellner at an Identified Illegal Drug Laboratory Located at: 771 Cleveland Circle Lafayette, CO 80026: A copy of review can be downloaded from http://forensic-applications.com/meth/Woellner_771_Cleveland.pdf



issued, it would lend the impression that Mr. Richen is attempting to single out FACTs by creating “issues” where none actually exist whilst simultaneously ignoring actual violations by other contractors.

Below is another example from the same contractor, but for a different property in Boulder County.² This photograph similarly demonstrates three different violations 1) failure to collect 100 square centimeters, 2) re-use of templates, and 3) failure to collect samples pursuant to §6.2.10 (which, Mr. Richen has stated elsewhere, invalidates the entire sample). Again, we presume that Mr. Richen similarly issued a rejection letter to Ms. Julie Swick, the owner of the property to inform her that the work performed at her property contained multiple regulatory violations, and was thus rejected by Mr. Richen.



In his August 7, 2015 letter, Mr. Richen specifically identifies our sample number CM042715-05, and states he does not think it is possible to collect 100 cm² from the surface from where this sample was collected. So, let's address that sample.

The referenced sample (CM042715-05) was collected from a cylindrical gas line. A “cylinder” is merely a three dimensional representation of a curled flat surface. Thus, if one takes a piece of paper that is 10 cm wide by 10 cm high, and roll the paper such that two opposite edges meet, one has a cylinder that is still exactly 100 cm². Similarly, if one takes a cylinder (such as a gas line) whose circumference is 10 cm and has a length of 10 cm, and one opens the cylinder flat, one still has a 100 cm² surface. This is just basic grade-school geometry.

² 598 Cleveland Avenue in Louisville, CO 80027



Similarly, if one has a cylindrical gas line that is of *any* circumference, and one divides 100 by that circumference, then one will derive the number of centimeters of cylinder length necessary to obtain 100 cm². Some examples are below:

Given:

$$100 \text{ cm}^2 = \frac{\text{Total } 100\text{cm}^2}{X \text{ cm circumference}} = \text{Length of cylinder needed for a gas line of } X \text{ cm circumference}$$

Example 1:

$$\frac{100\text{cm}^2}{10 \text{ cm circumference}} = 10 \text{ cm length}$$

Thus collecting a 10 cm length from a gas line of 10 cm circumference equals a 100 cm² sample.

Example 2:

$$\frac{100\text{cm}^2}{5 \text{ cm circumference}} = 20 \text{ cm length}$$

Thus collecting a 20 cm length from a gas line of 5 cm circumference equals a 100 cm² sample.

The equation is equally true for rational numbers - Example 3:

$$\frac{100\text{cm}^2}{12.345 \text{ cm circumference}} = 8.1 \text{ cm length}$$

Thus collecting an 8.1 cm length from a gas line of 12.345 cm circumference equals a 100 cm² sample, and so forth for any given circumference.

In each of the above examples, by simply measuring the circumference of the gas line, one knows the exact length of line needed to sample to derive a surface area of 100 cm² as required by regulations. This is not exotic higher math, this is just simple grade-school geometry. We do not know why this has confused Mr. Richen; however, we do know that the approach is fully compliant with regulations.

ISSUE 4

Issue 4: The 4 part composite sample (CMO030315-01) collected on the attic flue with an area calculated [10 X 10 X 4] was not in compliance with the regulation. The areas sampled were not in 4 different locations throughout the room. [Part 1, Section 2 Definitions for "Composite sample" and "Composite sample result", and Part 1 Sections 6.2.2, 6.3.6, 6.3]

RESPONSE 4:

Mr. Richen is apparently confused about what the State regulations actually state, and it is possible he was looking at another consultant's report since there is no such sample as CMO030315-01 in our work; indeed, there aren't any verification sample identifiers that are even remotely similar to the referenced sample identifier. In any event, nowhere in the regulations are the "requirements" he believes to exist. The rubrics he cites are as follows:



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.

6.3.6 Collect all individual aliquots from 100 cm² sampling areas.

In the case of our samples, ALL samples were collected in different locations – that is, none of the samples overlapped any other sample location.

Nowhere in the regulations are there any requirements of spatial separation for composite samples (except that one composite obviously cannot be collected from within the confines of the dimensions from which a sample has already been collected. That is, one cannot overlap two or more sample boundaries). However, if a consultant wanted to collect the mandatory 400 cm² from four adjoining areas on the same wall, floor, or gas-line, etc, there are no regulatory provisions that prohibit that. Furthermore, the equation cited by Mr. Richen (10 X 10 X 4), would represent the mandatory sampling that is required by regulations since the equation provided simply means “four samples, each of 10 cm by 10 cm” – in other words, one 400 cm² composite analysis consisting of four 100 cm² samples, as required by regulations.

It would appear that Mr. Richen is misunderstanding the regulations, or the equation provided, and we respectfully suggest he reference the State regulations in greater detail.

ISSUE 5

Issue 5: There should have been Post-Decontamination samples collected in the interior and exterior of large appliances if they were not disposed of. [Part 1 Section 6.9.7]

RESPONSE 5:

Once again, it appears that Mr. Richen is confused with the State regulations. There is no such requirement as believed by Mr. Richen. If we look at the cited rubric we see the following:

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

The regulations do not state sampling the interior and the exterior of appliances is required.

At one point, on another project, we responded to a similar letter from Mr. Richen – and we asked Mr. Richen to show us the regulatory requirements which he believed we had violated. Eventually, during that project, Mr. Richen admitted that he hadn't actually read the regulations, and neither did he know what the requirements were pursuant to the regulations; but he told us he was nevertheless confident that our work was in violation of the regulations. We believe that when one is referencing the regulations, one should read the regulations first, then determine if the work is compliant.



If you would like us to respond to the other two letters prepared by Mr. Richen, we will provide you with two more letters addressing his “issues.” In those letters, we will provide multiple examples of Boulder County properties for which there are literally hundreds of actual regulatory violations by the consultants involved. If, on the other hand, Mr. Richen chooses to withdraw his three letters, we will consider the matter closed.

We will begin to prepare the additional responses to Mr. Richen’s other letters this Wednesday, August 12, 2015, if we have not heard back from you. If you have any questions, please feel free to contact me.

Thank you,



Caoimhín P. Connell
Forensic Industrial Hygienist





Public Health

Air Quality Program

August 7, 2015

Don Roybal
Housing Maintenance Manager
Boulder County Housing & Human Services
1288 Alaska Avenue
Longmont, CO 80501

RE: 769 Cleveland Circle Lafayette, CO 80027 Methamphetamine (Meth) Affected Property Post-Decontamination Report

Dear Mr. Roybal:

This letter confirms that Boulder County Public Health received a Consultant Meth Post-Decontamination Report for 769 Cleveland Circle Lafayette, CO 80027 from Forensic Applications Consulting Technologies, Inc. (FACTs) and a Contractor Decontamination Summary Report from Excel Environmental Inc. Review of the Consultant report determined that it did not meet the following requirements of the Colorado Board of Health Regulation No. 6 CCR 1014-3 CLEANUP OF METHAMPHETAMINE-AFFECTED PROPERTIES. The Contractor's report met the requirements.

Issue 1: The report of a positive Field Blank (CM030215-04, result of 0.32 micrograms per sample) was not resolved in the report. A positive blank result should be resolved in the report since the result may indicate cross contamination problems with other samples. [Part 1 Section 6.12.8 and Section 9 "USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review, Office of Superfund Remediation and Technology Innovation, United States Environmental Protection Agency, OSWER 9240.1-48, USEPA-540R-08-01 (June 2008)."]

Issue 2: There was no discussion as to the disposition of the medicine cabinet, sample [CM040915-04] which had a result of 0.90 micrograms per 100 centimeters squared (cm²). Was the cabinet washed or disposed? [Part 1 Section 7.1]

Issue 3: I do not think it is possible to sample a 100cm² area from these items. [Part 1 Sections 6.2.2; 6.3.6]

- Tops of door frames samples CM040915-01; CM0040915-05
- Top of light fixture CM0040915-02
- On a sub-basement gas line CM042715-05

[Part 1 Part 1, Section 2 Definitions for "Composite sample" and "Composite sample result", and Part 1 Sections 6.2.2, 6.3.6, 6.3]

Issue 4: The 4 part composite sample (CM0030315-01) collected on the attic flue with an area calculated [10 X 10 X 4] was not in compliance with the regulation. The areas sampled were not in 4 different locations throughout the room. [Part 1, Section 2 Definitions for "Composite sample" and "Composite sample result", and Part 1 Sections 6.2.2, 6.3.6, 6.3]

Issue 5: There should have been Post-Decontamination samples collected in the interior and exterior of large appliances if they were not disposed of. [Part 1 Section 6.9.7]

Issue 6: Because of the report's confusing presentation of sample information in tables, sampling field forms and chain of custodies I cannot completely track the specifics of each sample and so cannot verify if enough different locations were sampled. At least 4 different locations must be sampled and found compliant in every room, attic and crawl space. [Part 1, Section 2 Definitions for "Composite sample" and "Composite sample result" (See cut and paste of these definitions below my signature line.), and Part 1 Sections 6.2.2, 6.3.6, 6.9.1]

These issues can be resolved by some corrective actions and resubmittal of a clearer and easier to track Consultant Report.

For your reference the full updated regulation can be found at the following web link.
[http://www.sos.state.co.us/CCR/6%20CCR%201014-3.pdf?ruleVersionId=6014&fileName=6 CCR 1014-3](http://www.sos.state.co.us/CCR/6%20CCR%201014-3.pdf?ruleVersionId=6014&fileName=6%20CCR%201014-3)

If you have any questions please feel free to contact me at 303-441-1566 or e-mail at mrichen@bouldercounty.org

Sincerely,



Michael J. Richen CIH
Industrial Hygienist
Boulder County Public Health

CC electronically:

Ron Kauffman, City of Lafayette Chief Building Official
Colleen Brisnehan, CDPHE Hazardous Waste Division
Leslie Lacy, Boulder County Attorney's Office
Caoimhin Connell, FACTs

DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT
State Board of Health
CLEANUP OF METHAMPHETAMINE-AFFECTED PROPERTIES
6 CCR 1014-3

Part 1 Section 2.0 Definitions

"Composite sample" means a sample comprised of multiple aliquots collected from separate locations.

"Composite sample result" is the concentration of the analyzed contaminant per unit area. It is derived by dividing the total amount of the contaminant detected by the analytical method by the combined total area of the sample aliquots. Composite sample results for methamphetamine and iodine should be reported as x micrograms/100 cm².