

**Final Verification Sampling and
DECISION STATEMENT
of an**

**Identified Illegal Drug Laboratory
618 Park County Road 68
Bailey, Colorado**

Prepared for:

Clay Pederson
Administrative Vice President
National Farmers Union
5619 DTC Parkway, Suite 300
Greenwood Village, CO 80111

Prepared by:

FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.
185 Bounty Hunter's Lane
Bailey, CO 80421



October 7, 2008

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EXECUTIVE SUMMARY

On March 14, 2008, the Park County Sheriff's Office (PCSO) executed a search warrant at the National Farmers Union Educational Center, 618 Park County Road 68, Bailey, Colorado, 80421 (the subject property). During the search, members of PCSO identified a small amount of methamphetamine stored on the property.

On Thursday, June 12, 2008, Forensic Applications Consulting Technologies, Inc. (FACTs) performed a standard cursory evaluation for the presence of methamphetamine contamination at the subject property. The cursory evaluation conclusively confirmed the presence of methamphetamine in three of the buildings, as described in a report of the cursory evaluation dated June 19, 2008.

During the week of June 23, 2008, FACTs performed a State mandated Preliminary Assessment as defined by Colorado State Board of Health Regulation 6 CCR 1013-4. As required by regulation, each structure was independently assessed, but the entire complex was deemed to be the subject property (the illegal drug lab). In all, over 100 locations were sampled throughout the complex.

The results of the Preliminary Assessment indicated three of the structures were not in compliance with state regulation and required remediation. The structures that required remediation were:

1. The Great Hall
2. Residential Trailer
3. Spruce Lodge

The Preliminary Assessment was conducted such that the collected samples would also meet the requirements of final verification sampling, and, if site conditions permitted, serve as a Decision Statement releasing eleven of the fourteen structures without need for further action. The Preliminary Assessment resulted in a Decision Statement¹ for the following buildings:

¹ Ibid. (§8)



Building Number	Building Name
2	Lean-to and Garage
3	Aspen Lodge
4	Aspen Pump House (Generator House)
5	Nurse's Trailer
6	Cedar Lodge
7	Cedar Lodge / Residential Pump House
8	Work Shop
10	Bridge Pump House
12	Juniper Lodge
13	Juniper Lodge Trailer
14	Field Kitchen

**Table 1
Structures for which the Decision Statement Applies**

Although FACTs had no involvement whatsoever in any of the remediation activities, and has no firsthand knowledge of any activities performed by any contractors on site, based on the best information available, two contractors were hired by the Registered Owner to perform remediation activities.

During the first part of September, 2008, Crystal Clean Decontamination LLC performed remediation activities at two structures; Structure 1 (The Great Hall) and Structure 11 (Spruce Lodge). The remediation activities in Structure 1 were exclusively limited to the Administration Office; the remediation activities in Structure 11 included all occupiable areas.

At an undetermined time, during September 2008, H&S Excavating demolished Structure 9, the Residential Trailer.

Although FACTs is required to include specific information of the contractor's activities, FACTs lacks the statutory authority to compel a contractor to provide that information. Included with this document package are both contractor's submittals, without our interpretation.

REGULATORY REQUIREMENTS

Federal Requirements

All work performed by FACTs was consistent with OSHA regulations. The Remediation Contractors were responsible for ensuring their own compliance with OSHA. FACTs is not aware of any violations of OSHA regulations during this project.

State Requirements

The Colorado State Board Of Health *Regulations Pertaining to the Cleanup of Methamphetamine Laboratories* (6-CCR 1014-3) become applicable when an owner of a property has received notification from a peace officer that chemicals, equipment, or supplies indicative of a drug laboratory are located at the property or when a drug



laboratory is otherwise discovered and the owner of the property where the drug laboratory is located has received notice. Whenever a methlab has been so discovered, the property must be either demolished or documented as containing contaminant levels below statutory thresholds.²

If a structure has been demolished, no further action is required.

After a property has been remediated, an Industrial Hygienist must test the hypothesis that the property is not compliant with State Statutes (i.e. the property contains contamination levels in excess of regulatory thresholds). As part of the hypothesis testing, the Industrial Hygienist must perform objective sampling to quantify the remaining contamination (if any).

If, based on the totality of the circumstances, the Industrial Hygienist finds insufficient evidence to support the hypothesis that any given area is non-compliant,³ that area shall be deemed to be compliant with CRS §25-18.5-103 (2) and the Industrial Hygienist shall release the property.⁴

In order for a proper final declaration to be made, a final decontamination verification assessment must be performed by an Industrial Hygienist as defined in CRS §24-30-1402. This decontamination verification was performed by Mr. Caoimhín P. Connell, Forensic Industrial Hygienist, who meets the statutory definition and is entitled to practice Industrial Hygiene in the State of Colorado and is additionally qualified to perform the necessary testing.

According to 6-CCR 1014-3, specific mandatory information must be presented in the final verification assessment. Included with this discussion, is the mandatory information as summarized in Table 1, below.

² The actual contaminant thresholds will vary based on the type of activities identified at the lab; the actual statutory threshold is incumbent on the number of samples collected as a composite or discrete samples.

³ No guarantee is ever made or implied that the property is completely free of contamination. Rather, a reasonable, standardized approach to decontamination is executed.

⁴ If objective sampling data indicates contamination is less than the cleanup level, that data may be used as *prima facie* evidence that insufficient evidence exists to support the hypothesis that any given area is non-compliant.



Mandatory Final Documents 6-CCR 1014-3	DOCUMENTATION	Included
§8.1	Property description field form	Note 1
§8.2	Description of manufacturing methods and chemicals	Note 1
§8.3	Law Enforcement documentation review discussion	Note 1
§8.4	Description and Drawing of Storage area(s)	Note 1
§8.5	Description and Drawing of Waste area(s)	Note 1
§8.6	Description and Drawing of Cook area(s)	Note 1
§8.7	Field Observations field form	Note 1
	FACTs Functional space inventory field form	Note 1
§8.8	Plumbing inspection field form	Note 1
	FACTs ISDS field form	Note 1
§8.9	Contamination migration field form	Note 1
§8.10	Identification of common ventilation systems	Note 1
§8.11	Description of the sampling procedures and QA/QC	<i>Carl</i>
§8.12	Analytical Description and Laboratory QA/QC	<i>Carl</i>
§8.13	Location and results of initial sampling with drawings	Note 1
§8.14	FACTs health and safety procedures in accordance with OSHA	<i>Carl</i>
§8.15	Contractor's description of the decontamination procedures used and a description of each area that was decontaminated	<i>Carl</i>
§8.16	Contractor's description of the removal procedures used and a description of area where removal was conducted, and the materials removed	<i>Carl</i>
§8.17	A description of the encapsulation procedures used and a description of the areas and/or materials where encapsulation was performed	<i>Carl</i>
§8.18	A description of the waste management procedures used, including handling and final disposal of wastes.	<i>Carl</i>
§8.19	Description of location and results of post decontamination sampling, identification and figure of location	<i>Carl</i>
§8.20	FACTs Pre-remediation photographs and log	Note 1
	FACTs Post-remediation photographs and log	<i>Carl</i>
§8.21	FACTs SOQ	<i>Carl</i>
§8.22	Certification of procedures, results, and variations	<i>Carl</i>
§8.23	Mandatory Certification Language	<i>Carl</i>
§8.24	Signature Sheet	<i>Carl</i>
	Analytical Laboratory Reports	<i>Carl</i>
	FACTs final closeout inventory document	Note 1
	FACTs Field Sampling Forms	<i>Carl</i>

Note 1: See the Preliminary Assessment dated July 15, 2008, (included with this Decision Statement as an Appendix on the CD) filed with Park County Department of Health

Table 2
Inventory of Mandatory Information



VERIFICATION SAMPLING

Sample Collection

During final verification sampling, wipe samples were collected by FACTs in a manner consistent with State Regulation 6-CCR 1014-3. The wipe sample medium was individually wrapped commercially available Johnson & Johnson™ gauze pads (FACTs Lot # G0804). Each pad was moistened with reagent grade methyl alcohol (FACTs Lots A0703). Each gauze pad was prepared in a clean environment and inserted into an individually identified plastic centrifuge tube with a cap.

Prior to the collection of each sample, the Industrial Hygienist donned fresh surgical gloves to prevent the possibility of cross-contamination. Consistent with State Regulations and good sampling theory, the location of the samples was based on professional judgment. In this case, it was FACTs' professional opinion that both biased sampling and authoritative judgmental sampling would be appropriate.

Biased sampling was used during the sampling of Structure 1, in the Administrative Offices. Biased sampling was selected based on our visual observation of heavy residual dust remaining on the top of the electrical junction box.

Based on our professional opinion, the potential for residual contamination in Structure 11, was not expected to be greater in any one area. Therefore, we used a random sampling strategy followed by authoritative judgmental sampling strategy. The general sample locations within each functional space was randomly identified by the input of an unpredictable number, whose output was a function of a simple algorithm. In this way, every and all surfaces had an equal probability of being sampled, and the Industrial Hygienist had no way of knowing the exact location of the sample. Once the algorithm identified the general sample location, each possible sample area was assigned a numerical value, and the final sampling location was determined by the algorithm. If the final area did not represent a suitable surface (such as new window glass, etc), authoritative judgmental sampling was used to select an area adjacent to the randomly selected area. Each sample area was then delineated with a measured outline.

Each wipe sample was collected by methodically wiping the entire surface of the selected area with moderate pressure; first in one direction and then in the opposite direction, folding the gauze to reveal fresh material as necessary. Each sample was returned to its centrifuge tube and capped with a screw-cap.

Samples were maintained in the control of FACTs at all times, and submitted via FedEx to Analytical Chemistry, Inc. (ACI) of Tukwila, Washington. ACI is one of the laboratories identified in State regulation 6-CCR 1014-3 as being proficient in performing methamphetamine analysis.



Quality Assurance/Quality Control Precautions

Introduction of Contamination

Prior to entering any structure, FACTs personnel donned fresh outer clothing which may have consisted exclusively of Level D ensemble with booties, or an outer full body Tyvek suit.

The ladder used by FACTs was washed at a commercial car wash prior to entry into any structure.

Field sampling equipment and containers were strategically staged at the entry of the structure to be sampled.

Field Blanks

For QA/QC purposes, and as required by regulation, one field blank was randomly selected from the batch, and randomly inserted in the sampling sequence and submitted along with the samples for methamphetamine analysis. To ensure the integrity of the blank, FACTs personnel were unaware, until the actual time of sampling, which specific sample would be submitted as a blank. To ensure the integrity of the blank, laboratory personnel were not informed which specific samples were blank. The blanks confirm the materials are not contaminated with methamphetamine.

Field Duplicates

For the purposes of the data quality objectives associated with this Decision Statement, no duplicates were required, and none were collected.

Cross Contamination

Prior to the collection of each specific sample area, the Industrial Hygienist donned fresh surgical gloves, to protect against the possibility of cross contamination.

Collection Rationale

The samples that were collected throughout the subject property comprised of “discreet” samples. Discreet samples are collected at single isolated locations. In the following table, the “Threshold” is that value below which the sample result would need to be to confirm compliance.

There are two criteria that determine the minimum number of samples that must be collected prior to issuing a Decision Statement. A minimum number of sample must be collected based on the total area comprising the methlab, one sample must be collected for each functional space. Under no circumstances, may fewer than 5 samples be collected per subject property to be cleared.

In this case, the total floor space in question was 20,735 square feet. Based on this area, a minimum of 39 samples would be required. This property had 43 identified Functional Spaces, however, eight of those spaces were eliminated when the residential trailer was



demolished - leaving a total 35. The higher of the two values represents the minimum number of samples necessary. One blank must be submitted for every ten samples resulting in a minimum of 43 analyses necessary to clear the property. In all, 39 discreet samples were collected pursuant to final clearance sampling criteria, along with a total of six field blanks. Only the final clearance samples for the areas remediated are included with this discussion. All other samples are discussed in the Preliminary Assessment.

Sample Locations

Great Hall

One sample was collected from the functional space identified as the Office in the Great Hall. The office was the only area where contamination was identified during the Preliminary Assessment. The sample was collected from the top of an electrical junction box.

FACTs was concerned that during the remediation activities, fugitive emissions of contamination may have migrated from the remediation area into otherwise uncontaminated locations. To confirm that no such migration occurred, FACTs collected samples from two areas adjacent to the remediation area, and which were known to be contamination free prior to the commencement of remediation activities. The remediation contractor was not aware that such confirmatory samples were to be collected, and made no special provisions to accommodate the selected areas.

We collected one sample from the floor of the Great Hall approximately three meters north and west of the Office entrance. We also collected one sample from the top of the clothes dryer in the Laundry Room adjacent to the Office.

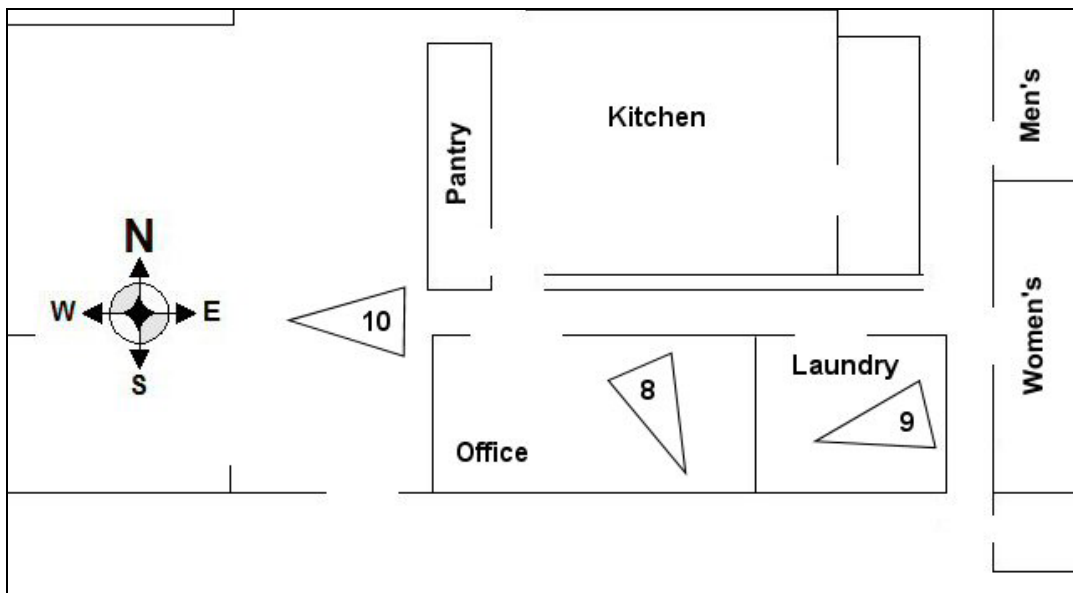


Figure 1
Final Verification Samples
Great Hall (Not to scale)



Spruce Lodge

Pursuant to regulations, FACTs collected one discreet wipe sample from each functional space within Spruce Lodge.

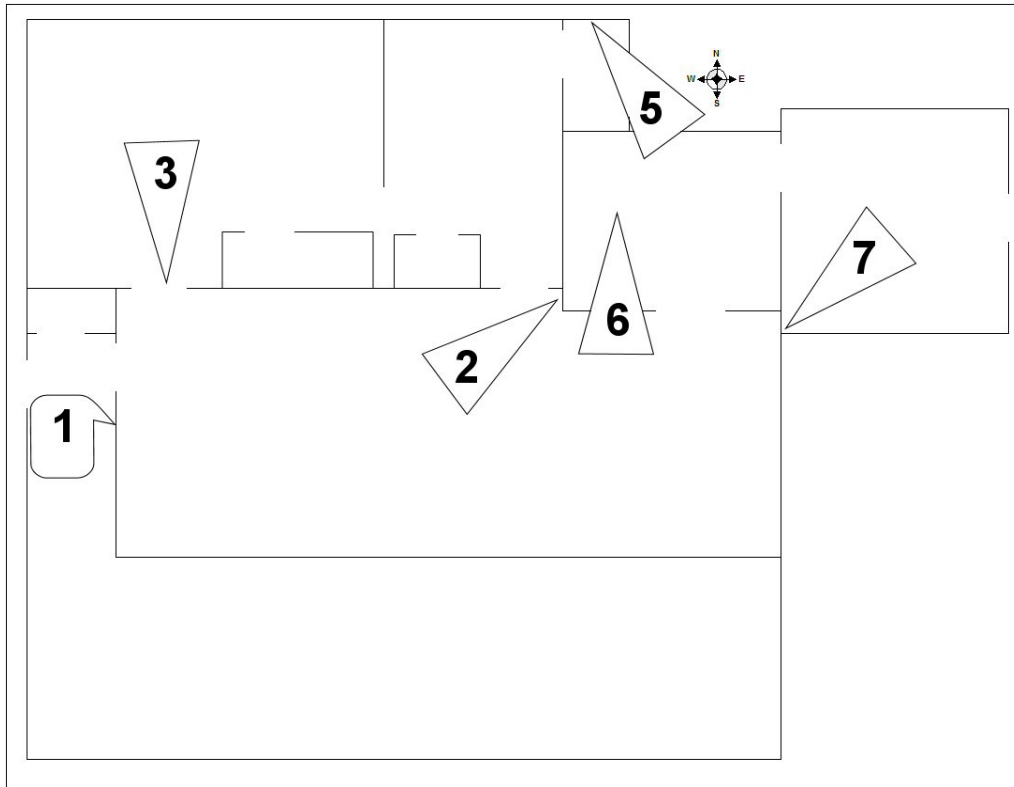


Figure 2
Final Verification Samples
Spruce Lodge (Not to scale)

Sample ID	Location	Bldg. #	Area cm ²	Result μ /100 cm ²	Compliance Criterium	Compliance Status
FM091608-01	East wall in north end of veranda	11	523	BDL	0.50	PASS
FM091608-02	East wall between DR and LR	11	523	0.04	0.50	PASS
FM091608-03	S Door in NW most bedroom	11	523	0.01	0.50	PASS
FM091608-04	BX	11	NA	BDL	0.50	PASS
FM091608-05	Horizontal surface bathroom window	11	740	0.02	0.50	PASS
FM091608-06	Kitchen floor	11	523	0.07	0.50	PASS
FM091608-07	East Bedroom Ceiling SW Corner	11	523	0.01	0.50	PASS
FM091608-08	Top of electrical junction box in office	1	548	0.04	0.50	PASS
FM091608-09	Laundry room top of clothes dryer	1	523	BDL	0.50	PASS
FM091608-10	Floor of great hall	1	523	BDL	0.50	PASS

Table 3
Summary of Final Verification Samples



Each sample collected from the subject property during final verification sampling indicated compliance. Several sample results were below the detection limit for the method (BDL).

Quality Assurance / Quality Control

The following section is not intended to be understood by the casual reader; this mandatory QA/QC section is standard SW846 style QA/QC reporting. All abbreviations are standard laboratory use. The QA/QC indicate the data meet the stated data quality objectives.

Final Data Set

MDL was 0.004 µg; LOQ was 0.03 µg; MBX <MDL; LCS 0.1 µg (RPD <1%, recovery =100%); Matrix spike 0.020 µg (RPD 16%; recovery 85%); Matrix spike Dup 0.020 µg; (RPD <1%; recovery 100%); Surrogate recovery (all samples): High 110% (Sample 8), Low 95% (Samples 1); FACTs reagents: MeOH lot #A0703 <MDL for n=20; Gauze lot G0804 <MDL for n=7.

The QA/QC indicate the data met the data quality objectives; and the results appear to be biased high (that is, the samples may contain less methamphetamine than reported by the laboratory).

CONCLUSIONS

Diligent adherence to the State regulations does not guarantee that a remediated property will be completely free of all residual contamination. Rather, the purpose of the regulations is to ensure that properties are assessed and remediated in a consistent fashion, and that verification of remediation is performed in a scientifically valid manner.

In the absence of contradictory information, wall cavities, and similar inaccessible places on the property are presumed to contain *de minimis* methamphetamine residue. However, these areas are reasonably considered to be “no-contact” or “low-contact” areas that do not present a reasonable probability of exposure.

Pursuant to the current state of knowledge, and pursuant to state regulations, “contaminant” is defined as “...a *chemical residue that may present an immediate or long-term threat to human health and the environment.*” The risk models⁵ described in the supporting documentation for 6-CCR 1014-3, suggest that exposure from these areas would not reasonably pose “an immediate or long-term threat to human health and the environment” and, therefore, the presumed residues (if they exist at all) do not meet the definition of “contamination.”

In post-decontamination sampling, the hypothesis is made that the area is non-compliant, and data are collected to test the hypothesis. The lack of data supporting the hypothesis

⁵ *Support For Selection Of A Cleanup Level For Methamphetamine At Clandestine Drug Laboratories*, Colorado Department Of Public Health And The Environment, February 2005



leads the Industrial Hygienist to accept the null hypothesis and conclude that the area is compliant.

In this case, the sampling failed to demonstrate that the subject property was non-compliant. **As such, pursuant to 6-CCR 1014-3, we accept the null hypothesis and find the subject property at 618 Park County Road 68, in its entirety as defined in the Preliminary Assessment compliant as defined in 6-CCR 1014-3.** *We recommend* the property be immediately released for occupancy.



APPENDIX A
REMIATOR'S SUBMITTAL

Crystal Clean Decontamination LLC.
2594 South Wolff St.
Denver CO 80219
Direct 303.884.5489
Fax 303.975.9972
priley@crystalcleandecon.com

Decontamination Summary for properties located at 618 Park County Rd Bailey CO. 80421

Spruce House

8.14 All work performed by Crystal Clean Decon LLC (CCD). Involving the affected property adhered to *Colorado 6 CCR 1014-3 State Board of Health Regulations pertaining to the Cleanup of Methamphetamine Laboratories* and the *Local Health Regulations*.

All work was performed by Clan Lab Certified & OSHA (Hazwoper) Certified workers and supervisors. All workers wore a minimum of level 'C' PPE until the decontamination was complete.

8.15 The decontamination on the subject property (Spruce House) began by establishing a Negative air environment and containment. One 2000 CFM HEPA filtered negative air machine was set up outside of the property and vented through exterior windows. The Spruce House is approximately 1500 sq. ft. consisting of three bedrooms, one bathroom, one kitchen, one dining room, one living room, one large L shaped enclosed porch. The majority of the surfaces are finished wood.

A single chamber decontamination chamber was set up outside the front door. One 30 yard roll off dumpster was placed as close to the property as possible.

8.16 All chattels were bagged and transported to the roll off as well as all of the furniture, appliances and carpeting prior to the decontamination phase.

8.17 Not applicable

No encapsulation was performed during the decontamination of this property.

8.18 Mt.View waste systems provided one 30 yard container. All waste was disposed of at the D.A.D.S. landfill on Tower rd. in Denver CO. The receipt is available upon request. The decontamination phase began with HEPA vacuuming the property, twice. Then all surfaces were sprayed with a neutral detergent, scrubbed by hand and then extracted using industrial equipment. This process was repeated three times. All affluent generated was tested to be neutral using Ph strips prior to disposing of in the ISDS.

No encapsulation was performed during the decontamination of this property.

Peter C Riley, President
Crystal Clean Decon, LLC
2594 S. Wolff St.
Denver CO 80219
303.884.5489 direct
303.975.9972 fax

Administration Office

8.14 All work performed by Crystal Clean Decon LLC (CCD). Involving the affected property adhered to *Colorado 6 CCR 1014-3 State Board of Health Regulations pertaining to the Cleanup of Methamphetamine Laboratories* and the *Local Health Regulations*.

All work was performed by Clan Lab Certified & OSHA (Hazwoper) Certified workers and supervisors. All workers wore a minimum of level 'C' PPE until the decontamination was complete.

8.15 The decontamination on the subject property (Admin Office) began by establishing a Negative air environment and containment. One 2000 CFM HEPA filtered negative air machine was set up outside of the property and vented through exterior windows. The Admin office is approximately 300 sq. ft. consisting of one room. The majority of the surfaces are finished wood or concrete.

A single chamber decontamination chamber was set up outside the front door. One 30 yard roll off dumpster was placed as close to the property as possible.

8.16 All chattels were bagged and transported to the roll off as well as all of the furniture, appliances and carpeting prior to the decontamination phase.

8.17 Not applicable

No encapsulation was performed during the decontamination of this property.

8.18 Mt. View waste systems provided one 30 yard container. All waste was disposed of at the D.A.D.S. landfill on Tower rd. in Denver CO. The receipt/manifest will be forwarded as soon as it is received. The decontamination phase began with HEPA vacuuming the property, twice. Then all surfaces were sprayed with a neutral detergent, scrubbed by hand and then extracted using industrial equipment. This process was repeated three times. All effluent generated was tested to be neutral using Ph strips prior to disposing of in the ISDS.

Peter C Riley, President

Crystal Clean Decon, LLC
2594 S. Wolff St.
Denver CO 80219
303.884.5489 direct
303.975.9972 fax

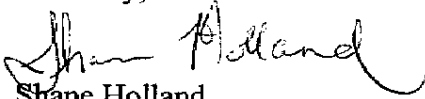
Shane D. Holland Excavating, Inc DBA
H & S Excavating

1769 Nova Rd.
Pine, CO 80470
303-838-5769 / 303-838-0581
Fax 303-816-0349

Mr. Caoimhin Connell,

The Farmer's Union mobile home trailer was demolished on dates per normal industry standards using a track hoe with a thumb attachment. The material was then loaded into roll off dumpsters and removed by Mountain View Waste. All industry standards and OSHA safety requirements were followed.

Sincerely,



Shane Holland
Owner/President
H & S Excavating

APPENDIX B
POST-REMEDIATION PHOTOGRAPH LOG SHEET FIELD FORM

POST-REMEDATION PHOTOGRAPH LOG SHEET

FACTs project name: Farmers Union	Form # ML9
Date: October 6, 2008	
Reporting IH:	Caoimhin P. Connell, Forensic IH

Name ^	Date taken	Name ^	Date taken
Bathroom	9/16/2008 12:23 PM	Kitchen (3)	9/16/2008 12:25 PM
Bathroom (2)	9/16/2008 12:23 PM	Kitchen (4)	9/16/2008 12:24 PM
Bathroom (3)	9/16/2008 12:17 PM	Laundry	9/17/2008 03:21 PM
Bathroom (4)	9/16/2008 12:16 PM	Laundry (2)	9/17/2008 03:36 PM
Bathroom (5)	9/16/2008 12:16 PM	Laundry (3)	9/17/2008 03:37 PM
Bathroom (6)	9/16/2008 12:15 PM	Living room	9/16/2008 12:03 PM
Bathroom (7)	9/16/2008 12:15 PM	Living room (2)	9/16/2008 12:03 PM
East Bedroom	9/16/2008 12:33 PM	Living room (3)	9/16/2008 12:01 PM
East Bedroom (2)	9/16/2008 12:32 PM	Living room (4)	9/16/2008 12:01 PM
East Bedroom (3)	9/16/2008 12:32 PM	Living room (5)	9/16/2008 12:00 PM
East Bedroom (4)	9/16/2008 12:29 PM	Livingroom dining room	9/16/2008 12:05 PM
East Bedroom (5)	9/16/2008 12:29 PM	Livingroom dining ro...	9/16/2008 12:04 PM
Exterior	9/16/2008 11:36 AM	Northwest bedroom	9/16/2008 12:14 PM
Exterior (2)	9/16/2008 11:35 AM	Northwest bedroom (2)	9/16/2008 12:14 PM
Floor of great hall	9/9/2008 03:38 PM	Northwest bedroom (3)	9/16/2008 12:11 PM
Floor of great hall (2)	9/17/2008 03:21 PM	Northwest bedroom (4)	9/16/2008 12:09 PM
Floor of great hall (3)	9/17/2008 03:39 PM	Office	9/17/2008 03:38 PM
General overview vi...		Office (2)	9/16/2008 11:17 AM
General overview vi...		Office (3)	9/16/2008 11:13 AM
IMG00253	9/17/2008 03:38 PM	Office (4)	9/16/2008 11:12 AM
Juniper	9/16/2008 11:35 AM	Office (5)	9/16/2008 11:12 AM
Juniper (2)	9/16/2008 11:34 AM	Office (6)	9/16/2008 11:12 AM
Kitchen	9/16/2008 12:27 PM	Office (7)	9/16/2008 11:02 AM
Kitchen (2)	9/16/2008 12:27 PM	Office (8)	9/16/2008 11:00 AM
Name ^	Date taken		
Office (9)	9/16/2008 10:58 AM		
Office (10)	9/16/2008 10:58 AM		
Office (11)	9/16/2008 10:57 AM		
Office (12)	9/16/2008 10:57 AM		
Office (13)	9/16/2008 10:57 AM		
Office (14)	9/16/2008 10:56 AM		
Office tunnel	9/16/2008 10:59 AM		
Office tunnel (2)	9/16/2008 10:59 AM		
Office tunnel (3)	9/16/2008 10:56 AM		
Office tunnel (4)	9/16/2008 10:56 AM		
Trailer location	9/16/2008 10:40 AM		
Trailer location (2)	9/16/2008 10:40 AM		
Trailer location (3)	9/16/2008 10:39 AM		
Trailer remnant	9/16/2008 10:39 AM		
Veranda	9/16/2008 11:59 AM		
Veranda (2)	9/16/2008 11:58 AM		
Veranda (3)	9/16/2008 11:56 AM		
Veranda (4)	9/16/2008 11:53 AM		
Veranda (5)	9/16/2008 11:53 AM		

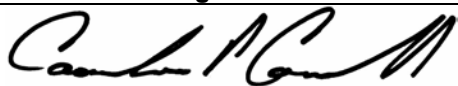
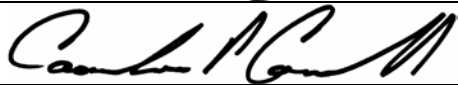




APPENDIX C
FINAL CERTIFICATION SIGNATURE SHEET

CERTIFICATION, VARIATIONS AND SIGNATURE SHEET

FACTs project name: Farmers Union	Form # ML14
Date: October 7, 2008	
Reporting IH:	Caoimhín P. Connell, Forensic IH

Certification

Statement	Signature
I do hereby certify that I conducted a preliminary assessment of the subject property in accordance with 6 CCR 1014-3, § 4.	
I do hereby certify that I conducted post-decontamination clearance sampling in accordance with 6 CCR 1014-3, §6.	
I do hereby certify that the cleanup standards established by 6 CCR 1014-3, § 7 have been met as evidenced by testing I conducted.	
I do hereby certify that the analytical results reported here are faithfully reproduced.	

In the section below, describe any variations from the standard.

Pursuant to the language required in 6 CCR 1014-3, § 8:

I do hereby certify that I conducted a preliminary assessment of the subject property in accordance with 6 CCR 1014-3, § 4. I further certify that the cleanup standards established by 6 CCR 1014-3, § 7 have been met as evidenced by testing I conducted.

Signature  Date: October 7, 2008



APPENDIX D
FIELD DATA SHEETS AND ANALYTICAL SUBMITTALS



ANALYTICAL CHEMISTRY INC.

Established in 1979

4611 S. 134th Place, Ste 200
Tukwila WA 98168-3240
Phone: 206-622-8353
Fax: 206-622-4623

E-mail: aci@acilabs.com

Website: www.acilabs.com

Lab Reference:	08151-04
Date Received:	September 22, 2008
Date Completed:	September 24, 2008

September 24, 2008

CAOIMHIN P CONNELL
FORENSIC APPLICATIONS INC
185 BOUNTY HUNTER'S LN
BAILEY CO 80421

CLIENT REF: Farmer

SAMPLES: wipes/10

ANALYSIS: Methamphetamine by Gas Chromatography-Mass Spectrometry.

RESULTS: in total micrograms (ug)

Sample	Methamphetamine, ug	% Surrogate Recovery
FM091608 - 01	< 0.030	95
FM091608 - 02	0.221	99
FM091608 - 03	0.076	97
FM091608 - 04	< 0.030	106
FM091608 - 05	0.120	107
FM091608 - 06	0.362	107
FM091608 - 07	0.053	100
FM091608 - 08	0.200	110
FM091608 - 09	< 0.030	108
FM091608 - 10	< 0.030	104
QA/QC Method Blank	< 0.004	
QC 0.100 ug Standard	0.100	
QA 0.020 ug Matrix Spike	0.017	
QA 0.020 ug Matrix Spike Duplicate	0.020	
Method Detection Limit (MDL)	0.004	
Practical Quantitation Limit (PQL)	0.030	

'<': less than, not detected above the PQL

Robert M. Orheim
Director of Laboratories



ANALYTICAL CHEMISTRY INC.

4611 S 134th Pl, Ste 200 Tukwila WA 98168-3240
 Website: www.acilabs.com

Phone: 206-622-8353
 FAX: 206-622-4623

CDL SAMPLING & CUSTODY FORM

Page 1 of 2
Carl

Please do not write in shaded areas.

SAMPLING DATE: Sept 16, 2008		REPORT TO: Caoimhin P. Connell		ANALYSIS REQUESTED													
PROJECT Name/No: FARMER		COMPANY: Forensic Applications, Inc.		1 Methamphetamine													
eMail: Fiosrach@aol.com		ADDRESS: 185 Bounty Hunters Lane, Bailey, CO 80421		2 Use entire contents													
SAMPLER NAME: Caoimhin P. Connell		PHONE: 303-903-7494		3													
				4													
				5													
				6 Not Submitted													
LAB Number	Sample Number	SAMPLE MATRIX		ANALYSIS REQUESTS						SAMPLER COMMENTS	LAB COMMENTS	No of Containers					
		Wipe	Vacuum	Other	1	2	3	4	5				6				
	FM091608-01	X			X												
	FM091608-02	X			X												
	FM091608-03	X			X												
	FM091608-04	X			X												
	FM091608-05	X			X												
	FM091608-06	X			X												
	FM091608-07	X			X												
	FM091608-08	X			X												
	FM091608-09	X			X												
	FM091608-10	X			X												
				Wipes Results in:		Total µg		Total µg		Total Number of Containers (verified by laboratory)							
				□ µg/100cm ²		☑ Total µg		Turnaround Time		Custody Seals:		Yes		No			
PRINT NAME		Signature		COMPANY		DATE		TIME		Container:		Intact		Broken			
Caoimhin P. Connell		<i>C. P. Connell</i>		FACTS, Inc.		09/16/08		1620		☑ 24 Hours (2X)		☑ 2 Days (1.75X)		☑ 3 Days (1.5X)			
MIA SAZON		<i>Mia Sazon</i>		ACT		9/22/08		1400		☑ 2 Days (1.75X)		☑ 3 Days (1.5X)		Inspected By: MIA SAZON			
										☑ Routine		Lab File No.		08151-04			

APPENDIX E
FINAL CLOSEOUT INVENTORY DOCUMENT

FINAL SAMPLING CHECKLIST

FACTs project name:	Farmers Union	Form # ML18
Date:	October 7, 2008	
Reporting IH:	Caoimhín P. Connell, Forensic IH	

General Sampling Considerations	
Floor Space Area of Lab (ft ²)	20735
One extra sample is required for every 500 ft ² of floor space >1,500 ft ² . Enter number of <u>extra</u> samples required:	39
Is the lab a motor vehicle?	No
Does the lab contain motor vehicles?	No
Enter number of motor vehicles associated with the lab:	0
Are the vehicles considered functional spaces of the lab?	NA
For vehicles that are merely functional spaces, one extra 500 cm ² sample is required for each vehicle. Enter the number of extra samples for functional space vehicles:	0
Enter number of large vehicles (campers, trailers, etc)	0
One extra sample is required for every 50 ft ² of floor space of large vehicles. Enter number of extra samples required:	0
One BX must be included for every 10 samples. Enter the number of BX required.	4
Enter Number of Functional Spaces to be included	35
Enter total number of samples/BXs required	39
Enter total number of samples/BXs actually collected	45
Collected a minimum of 5 samples from the lab?	Yes
Collected a minimum of 3 discrete samples from the lab?	Yes
Collected minimum of 500 cm ² per functional space?	Yes
Collected minimum of 1,000 cm ² surface area from the lab?	Yes
Sketch of the sample locations performed?	Yes



APPENDIX F
INDUSTRIAL HYGIENIST'S SOQ



FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.

CONSULTANT STATEMENT OF QUALIFICATIONS

(as required by State Board of Health Regulations 6 CCR 1014-3 Section 8.21)

FACTs project name:	Farmer's Union	Form # ML15
Date:	Oct 7, 2008	
Reporting IH:	Caoimhín P. Connell, Forensic IH	

Caoimhín P. Connell, is a private consulting forensic Industrial Hygienist meeting the definition of an "Industrial Hygienist" as that term is defined in the Colorado Revised Statutes §24-30-1402. Mr. Connell has been a practicing Industrial Hygienist in the State of Colorado since 1987 and has been involved in clandestine drug lab (including meth-lab) investigations since May of 2002.

Mr. Connell is a recognized authority in methlab operations and is a Certified Meth-Lab Safety Instructor through the Colorado Regional Community Policing Institute (Colorado Department of Public Safety, Division of Criminal Justice). Mr. Connell has provided methlab training for officers of over 25 Colorado Police agencies, 20 Sheriff's Offices, federal agents, and probation and parole officers from the 2nd, 7th and 9th Colorado judicial districts. He has provided meth-lab lectures to prestigious organizations such as the County Sheriff's of Colorado, the American Industrial Hygiene Association, and the National Safety Council.

Mr. Connell is Colorado's only private consulting Industrial Hygienist 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 (Certification Number B-10670); he is a member of the Colorado Drug Investigators Association, the American Industrial Hygiene Association, and the Occupational Hygiene Society of Ireland.

He has received over 120 hours of highly specialized law-enforcement sensitive training in meth-labs and clan-labs (including manufacturing and identification of booby-traps commonly found at meth-labs) through the Iowa National Guard/Midwest Counterdrug Training Center and the Florida National Guard/Multijurisdictional Counterdrug Task Force, St. Petersburg College as well as through the U.S. Bureau of Justice Assistance (US Dept. of Justice). Additionally, he received extensive training in the Colorado Revised Statutes, including Title 18, Article 18 "Uniform Controlled Substances Act of 1992."

Mr. Connell is also a current law enforcement officer in the State of Colorado, 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 80 assessments in illegal drug labs, and collected approximately 1,000 samples during assessments.

He has extensive experience performing assessments pursuant to the Colorado meth-lab regulation, 6 CCR 1014-3, (State Board Of Health *Regulations Pertaining to the Cleanup of Methamphetamine Laboratories*) and was an original team member on two of the legislative working-groups which wrote the regulations for the State of Colorado. Mr. Connell 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 Colorado regulations. He has provided expert witness testimony in civil cases and testified before the Colorado Board of Health and Colorado Legislature Judicial Committee regarding methlab issues. Mr. Connell has provided private consumers, state officials and Federal Government representatives with forensic arguments against fraudulent industrial hygienists and other unauthorized consultants performing invalid methlab assessments.

Mr. Connell, who is a committee member of the ASTM International Forensic Sciences Committee, was the sole sponsor of the draft ASTM E50 *Standard Practice for the Assessment of Contamination at Suspected Clandestine Drug Laboratories*, and he is an author of a recent (2007) AIHA Publication on methlab assessment and remediation.

APPENDIX G
COMPACT DIGITAL DISC