



**FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.**

**Appendix C of  
Preliminary Assessment  
of an  
Identified Illegal Drug Laboratory  
at:**

**XXXX N. Xxxroe Street  
Loveland, CO**

**Review of Koch Environmental Health, Inc. Report**

Prepared by:

**FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.**

185 Bounty Hunter's Lane  
Bailey, CO 80421



September 19, 2013

# Table of Contents

Table of Contents .....	2
EXECUTIVE SUMMARY .....	3
CHRONOLOGY.....	4
PRELIMINARY ASSESSMENT.....	4
Section 4.2.....	8
Section 4.3.....	9
Section 4.4.....	9
Section 4.5.....	10
Section 4.6.....	10
Section 4.7.....	11
Section 4.8.....	11
Section 4.9.....	11
Section 4.10.....	12
Section 4.11.....	12
FINAL VERIFICATION SAMPLING .....	12
Sample Requirements .....	13
Functional Spaces to be Included .....	13
Prohibited Surfaces .....	13
<i>Mixed Matrices</i> .....	14
<i>Iodine</i> .....	14
Low Probability Surfaces (§ 6.1 ).....	14
Prohibited Sampling Technique (Section 6.2.1).....	15
Missing Documentation .....	16
Section 8.15.....	16
Section 8.16.....	16
Section 8.17.....	16
Section 8.18.....	17
Section 8.19.....	17

FACTs performed a cursory review of the additional documents provided to us by Xxxxxx Co., (Xxxxx; herein after called FIE); specifically, the Koch Environmental Health, Inc., July 26, 2013 Preliminary Assessment and Post-verification testing report regarding the above mentioned subject property.

Fraudulent and incompetent consultants performing drug laboratory assessments have become such a problem in Colorado that in March of 2013, Senator Lois Tochtrop introduced SB13-219. FACTs provided advice and consultation to Sen. Tochtrop in the development of Senate Bill 13-219. Due to the serious nature of the problem and the number of methamphetamine contaminated properties involved, on May 28, 2013, Colorado Governor Hickenlooper signed into Law SB13-219; and several of the provisions of that law became effective on August 7, 2013. Since there has been a lack of enforcement of the regulations, the quality of work, and the errors associated with meth-lab assessment work, have become commonplace.



## EXECUTIVE SUMMARY

Overall, we identified several deficiencies with the work and documentation provided to us by FIE. We identified several fatal flaws associated with the Koch Environmental Health, Inc. (KEH) documentation. These fatal flaws indicated outstanding noncompliance in the attic, in the basement bathroom, in the garage, in the kitchen and living room, in the southeast bedroom, and other locations at the Xxxroe Street, Loveland, CO property.

Although we overlooked many errors and flaws in the KEH report (such as where, in violation of Section 8.1, the consultant is required to identify the property owner and the KEH report did not) the overall compliance score for the KEH Preliminary Assessment was 37.5%. The overall compliance score for the Decision Statement was 42.8%.

Generally speaking, several of the areas of the residence were never cleared according to the mandatory sections of State regulations.

For example, 6 CCR 1014-3 requires each Functional Space to be subjected to sampling before a declaration of compliance can be met. For this property KEH never collected any verification samples from the garage or the basement bathroom (two areas that KEH itself had identified as Functional Spaces).

Similarly, State regulations prohibit the collection of final verification samples from porous surfaces. However, KEH collected samples from porous surfaces in the attic and in the southeast bedroom of the basement.

Several other deficiencies are identified in the following discussion.



# CHRONOLOGY

In general, it is our impression that the chronology of events looks something like this:

Date	Activity	Comments
6/16/2012	Loveland PD Discovery	Regulations triggered
11/1/2012	Century Environmental Sampling	No actual date, report or info
Unknown	Unlawful trash- out and removal	
12/13/2012	FIE's Photos	
12/28/2012	Helping Hands remediation proposal	Identifies previous sampling
12/26/2012	Century Environmental Bid	
Unknown	Unlawful trash- out and removal	
1/28/2013	Xxxxx County Letter of Concern - dumping	Identifies meth waste at landfill
1/29/2013	Post remediation assessment	Date is probably a typographical error on the part of KEH (found on KEH report p. 3)
3/1/2013	Preliminary Assessment conducted	Date is probably a typographical error on the part of KEH (found in KEH Executive Summary)
3/19/2013	PA Site visit performed	
3/21/2013	Remediation plan developed	
7/1/2013	First Post Remediation Inspection	Date is probably a typographical error on the part of KEH (found in KEH Executive Summary)
7/11/2013	Post Remediation Visual Inspection	Date is probably correct
7/15/2013	Second Post Remediation Inspection	
7/26/2013	PA and DS document completed	

Table 1  
Approximate Chronology

# PRELIMINARY ASSESSMENT

Prior to cleaning or remediation of any kind, in Colorado, a Preliminary Assessment must be performed. The remediation must then be based on the findings of the Preliminary Assessment.

The Preliminary Assessment must contain specific elements to be valid. We have summarized each section with a general comment of compliance or adequacy. Adequacy of compliance is numerically rated. Where KEH may not have had the information available, that score is removed and not included.

Regulatory Section	Compliance	Compliance Score
4.1	Adequate	3/3
4.2	Deficient - missing	2/3
4.3	Adequate	3/3
4.4	Slightly deficient	2/3
4.5	Missing	0/3
4.6	Missing	0/3
4.7	Missing	0/3



4.8	Missing	0/3
4.9	Missing	0/3
4.10	Unknown	Not Scored
4.11	Unknown	Not Scored
4.12	Missing	0/3
4.13	Adequate	3/3
4.14	Inadequate	2/3
Total Score		37.5% Compliant

**Section 4.1**

*4.1. 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.*

The surrounding properties – which could be impacted - were not discussed or photographed. Therefore, the potential impact on surrounding structures is not known, and was not determined.

In their report KEH incorrectly stated:

**SITE DESCRIPTION**  
 The Site is a 884 ft<sup>2</sup> two-bedroom, single family ranch style home with a detached garage in a residential area located at [REDACTED] in the City of [REDACTED] County, Colorado. There are residential properties under separate ownership surrounding the property. The legal description of the property, from the Larimer County Assessor website, is:

The site is actually 2,152 square feet of occupiable floor space and not 884 square feet as stated. Furthermore, the attic space (which, by regulation must be included), increases the impacted square footage to 3,036 square feet.

It would appear the language in the KEH report is merely boiler-plate regardless of actual site conditions since KEH entirely failed to notice there was an Elementary School (Xxxroe Elementary School) across the street from the subject property and not residential as stated in their report. (The KEH report actually contains numerous errors of this type that are not addressed here).

KEH restates the same error later in their report:

The property is located in a residential neighborhood and is surrounded by similar single-family properties under separate addresses. Domestic water and waste services

This is similar to other reports we have reviewed by KEH which failed to properly address site conditions.<sup>1</sup>

Other language in the report also speaks to the lack of attention to detail with regard to site conditions; for example:

<sup>1</sup> <http://forensic-applications.com/meth/164thCriticalReview.pdf>



ISDSs (septic systems/tanks) on the property. Floors were mostly wood or linoleum with carpeting in the bedrooms only. Interior walls and ceilings are of drywall construction.

In fact, this is simply not true as the Living room was fully carpeted (See Photo below):



The Stairwell was carpeted:





The upper hallway was carpeted:



Upper Hall Looking East





Upper Hallway Looking West

Based on our experience, the lack of attention to detail is common for KEH.

#### Section 4.2

*4.2 Review of available law enforcement reports that provide information regarding the manufacturing method, chemicals present, cooking areas, chemical storage areas, and observed areas of contamination or waste disposal.*

KEH did not take into account the full information in the Police reports and failed to identify the storage, possible cook areas, and the use areas. Specifically, the police reports focus primarily on the basement as an area of heavy drug use, storage, and possibly cooking "Raid Dope" (production of a counterfeit (fake) controlled substance).

Often, although reports exist, it is not always possible to review those reports. Nevertheless, it is important for the consultant to document their attempts to comply with the regulations and document their attempts to obtain those law enforcement documents. Otherwise, there is no way to know if the consultant ignored the regulatory requirement, or made a good faith attempt to obtain otherwise unavailable documents.

In this case, it does not appear that KEH made any attempt to obtain or review the law enforcement documents involving SWAT from February 29, 2012 (Incident Number XXXXXXX).

Also, it does not appear that KEH made any attempt to obtain or review the law enforcement documents involving the drug activities from March 1, 2012 (Incident Number XXXxxx-xxxx).



Also, it does not appear that KEH made any attempt to obtain or review the law enforcement documents involving the drug activities from March 6, 2012 (Incident Number XXXX-xxxx).

Also, it does not appear that KEH made any attempt to obtain or review the law enforcement documents involving the drug activities from September 14, 2012 (Incident Number XXXXX-xxxx).

Section 4.3

*4.3. Identification of structural features that may indicate separate functional spaces, such as attics, false ceilings and crawl spaces, basements, closets, and cabinets.*

KEH appears to have adequately identified all functional spaces except one – the detached garage. Although, KEH initially identified the garage as a Functional Space, KEH then inexplicably ignored the garage entirely, and failed to evaluate or include the garage in their Preliminary Assessment (PA) and in the final verification sampling.

According to State statutes:

*(2.7) "Illegal drug laboratory" means the areas where controlled substances, as defined by section 18-18-102, C.R.S., have been manufactured, processed, cooked, disposed of, used, or stored **and all proximate areas that are likely to be contaminated** as a result of such manufacturing, processing, cooking, disposal, use, or storing.*

In their report, KEH states that the garage has not been assessed. However, KEH provides no explanation as to why they failed to include the garage, as required by regulation, into the assessment.

Section 4.4

*4.4. Identification of manufacturing methods based on observations and law enforcement reports.*

In its hand written notes, KEH fails to identify the manufacturing processes identified in the police reports as Raid Dope; this section is merely left blank in the KEH report:

<p><b>According to Law Enforcement Reports:</b></p> <p>Manufacturing Method: _____</p> <p>Chemicals present: _____</p> <p>Cooking areas: _____</p> <p>Chemical storage areas: _____</p> <p>Areas of contamination or waste disposal: _____</p>
--

Figure 1  
Excerpt from KEH Report

KEH fails to note the significance of the method described.



The FIE Photograph Log contains several photographs depicting scenes consistent with manufacturing methamphetamine by a red phosphorous pseudoephedrine reduction method. Those photographs include:

Photograph 2 on the FIE photolog, Page 16  
Photograph 2 on the FIE photolog, Page 18  
Photograph 1 on the FIE photolog, Page 19  
Photograph 2 on the FIE photolog, Page 20  
Photograph 1 on the FIE photolog, Page 27  
Photograph 1 on the FIE photolog, Page 37  
Photograph 2 on the FIE photolog, Page 41  
Photograph 1 on the FIE photolog, Page 43  
Photograph 1 on the FIE photolog, Page 47  
Photograph 2 on the FIE photolog, Page 47  
Photograph 1 on the FIE photolog, Page 49  
Photograph 2 on the FIE photolog, Page 58  
Photograph 1 on the FIE photolog, Page 65  
Photograph 2 on the FIE photolog, Page 71  
Photograph 1 on the FIE photolog, Page 73  
Photograph 2 on the FIE photolog, Page 73  
Photograph 1 on the FIE photolog, Page 74

Although none of the photographs are conclusive, these should have been mentioned in the KEH report. Therefore, we conclude one of two conditions must exist:

- 1) The site conditions were heavily modified in March, 2013 when KEH performed its assessment AND the FIE photos were not available to KEH; or
- 2) KEH observed either the conditions or the photographs and lacked the technical competency to understand what the visual indicators meant.

#### Section 4.5

*4.5. Identification of chemicals used, based on observations, law enforcement reports, and knowledge of manufacturing method(s).*

KEH failed to note the significance of the "Raid Dope" method described in the police reports.

#### Section 4.6

*4.6 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, or cooking areas, or based on professional judgment of the consultant; or the consultant may determine that assessment sampling is necessary to verify the presence or absence of contamination. If the consultant determines that assessment sampling is necessary, such sampling shall be conducted in accordance with the sampling protocols presented in Appendices A and D. Sample analysis shall be conducted in accordance with the method requirements presented in Appendices B and D.*



The KEH report is silent on the garage – which apparently remains a non-compliant Functional Space on the property. There is no indication or discussion on why KEH permitted the non-compliant space to remain noncompliant.

Recent representations made<sup>2</sup> by Ms. Coleen Brisnehan (Colorado Department of Public Health and Environment) regarding sampling are false.<sup>3</sup> Ms. Brisnehan has recently asserted that the regulations require sampling to be conducted during a Preliminary Assessment; however, no such requirements are found anywhere within the regulations. Therefore, during their Preliminary Assessment, KEH was fully within their professional judgment when they decided not to collect any samples during the Preliminary Assessment, and instead chose to assume noncompliance (in fact, in this case, KEH made the most prudent decision by not collecting any samples, since such sampling would have been a waste of financial resources).

However, since the garage was not sampled, KEH was therefore required to identify the garage as noncompliant.

#### Section 4.7

##### *4.7. Identification and documentation of chemical storage areas.*

KEH failed to identify the basement as the primary area of chemical storage; and failed to identify any other areas of primary chemical storage.

#### Section 4.8

##### *4.8. Identification and documentation of waste disposal areas.*

KEH failed to address this issue; and failed to identify the issue with the dumpster. It is not known if KEH was aware of the letter from the Xxxxx County Department of Health regarding the dumpster. spud

#### Section 4.9

##### *4.9. Identification and documentation of cooking areas.*

If the FIE photologs were known to KEH, and/or the site conditions depicted in those photos were present during the KEH site visit, then KEH should have addressed these to satisfy this Section.

On the other hand, if the FIE photologs were not known to KEH, the site conditions had sufficient information to satisfy this section.

---

<sup>2</sup> Letter from Coleen Brisnehan, to Joan Whittemore (CSPD) and Sgt. Harrell (CSPD) regarding Citizen Request #4967 (Tuesday, September 4, 2012 4:00 pm) From:, [WHITTEJO@ci.colospgs.co.us](mailto:WHITTEJO@ci.colospgs.co.us) to FACTs, Inc.

<sup>3</sup> At the time of this report (August 26, 2013), it is our understanding that Ms. Brisnehan and her office are still under investigation for regulatory misconduct, and for making various false statements.



### Section 4.10

4.10. Identification and documentation of signs of contamination such as staining, etching, fire damage, or outdoor areas of dead vegetation.

In their report KEH states:

Visual inspection indicated no evidence of chemicals or containers typically associated with clandestine drug manufacturing nor was any staining of surfaces considered to be the result of methamphetamine production observed during the final inspection(s). Upon

If the FIE photologs were not known to KEH, the site conditions had sufficient information to satisfy this section and there was considerable evidence of staining.

Even if the FIE photologs were not known to KEH, heavy staining was still present at the site during our September 4, 2013 assessment. Therefore, it is difficult to know why KEH did not note the prominent staining that was consistent with methamphetamine production.

### Section 4.11

4.11. Inspection of plumbing system integrity and identification and documentation of potential disposal into the sanitary sewer or an individual sewage disposal system (ISDS). If the consultant determines that field screening and/or sampling of an ISDS is necessary to determine if methamphetamine lab wastes have been disposed of into an ISDS, such field screening and/or sampling shall be conducted in accordance with the field screening and sampling protocols presented in Appendix D. Sample analysis shall be conducted in accordance with the method requirements presented in Appendices B and D.

Over all, the "Preliminary Assessment" performed by KEH failed to meet the State mandated requirements.

## **FINAL VERIFICATION SAMPLING**

According to Colorado Regulations, specific elements must be included as part of the final verification sampling and Decision Statement. Each of those sections are identified below along with the general statement of compliance observed by FACTs during our review.

Regulatory Section	Compliance	Score
Section 8.1	Deficient	2/3
Section 8.2	Deficient	2/3
Section 8.3	Deficient	2/3
Section 8.4	Deficient	2/3
Section 8.5	Deficient	2/3
Section 8.6	Deficient	2/3
Section 8.7	Deficient	2/3
Section 8.8	Deficient	2/3
Section 8.9	Adequate	3/3
Section 8.10	Adequate	3/3
Section 8.11	Deficient	2/3
Section 8.12	Deficient	2/3



Section 8.13	Deficient	2/3
Section 8.14	Missing	0/3
Section 8.15	Missing	0/3
Section 8.16	Missing	0/3
Section 8.17	Missing	0/3
Section 8.18	Missing	0/3
Section 8.19	Deficient	2/3
Section 8.20	Missing	0/3
Section 8.21	Deficient	2/3
Section 8.22	Deficient	2/3
Section 8.23	Deficient	2/3
Section 8.24	Adequate	3/3
Functional Space 1 cleared?	Invalid- mixed substrates	0/3
Functional Space 2 cleared?	Invalid – mixed substrates Invalid- Low probability surface	0/3
Functional Space 3 cleared?	Invalid -Porous surfaces	0/3
Functional Space 4 cleared?	Invalid -Porous surfaces Missing Iodine results	0/3
Functional Space 5 cleared?	Adequate	3/3
Functional Space 6 cleared?	Invalid - Not performed	0/3
Functional Space 7 cleared?	Invalid – Porous surfaces	0/3
Functional Space 8 cleared?	Adequate	3/3
Functional Space 9 cleared?	Invalid- Porous surfaces Invalid - Low probability surface	0/3
Functional Space 10 cleared?	Invalid – Porous surfaces	0/3
Functional Space 11 cleared?	Invalid - Not performed	0/3
Compliance Score		42.8%

Many of the provisions found in the final documentation section are similar or exactly the same as those found in Section 4. Since this overview is not intended to be a detailed discussion, we have not independently address the failures of documentation in Section 8, where those same failures appear in Section 4 already addressed above. Instead, we have merely identified the fatal flaws in sampling requirements as described below.

### **Sample Requirements**

#### **Functional Spaces to be Included**

During final verification sampling, all functional spaces must be included. According to State regulations:

- For any given *functional space*, at least 500 cm<sup>2</sup> of surface shall be sampled, unless the area is assumed to be non-compliant.

For this property, KEH identified the downstairs bathroom and the garage as functional space. However, neither of these Functional Spaces were subjected to final verification sampling.

#### ***Prohibited Surfaces***

According to State regulations:

Wipe sampling shall not be used to demonstrate that cleanup levels have been met on porous surfaces.



In their report, KEH states that they collected final verification samples from porous surfaces in the attic, west bedroom (upstairs), and in the northeast bedroom (upstairs). Therefore, neither of those areas were ever cleared pursuant to State regulations.

### ***Mixed Matrices***

According to mandatory State regulations, where composite samples are collected, they must be collected:

Any composite sampling must consist of like media, matrices or substrates. The mixing of media, matrices or substrates is not permitted.

In its report, in recognition of the prohibition of mixing substrates, KEH state they did not mix substrates in their composite sampling. However, a review of the actual data in the KEH report, clearly demonstrates that, in violation of State regulations, KEH did mix substrates in their final samples, thus rendering those samples invalid, and therefore rendering the clearance for those Functional Spaces similarly invalid. Mixed substrates were used by KEH in an attempt to clear the Living Room –Kitchen Functional Space and the Upstairs bathroom Functional Space.

### ***Iodine***

According to Section 7 of Colorado 6 CCR 1014-3:

7.2. If there is evidence of iodine contamination on materials or surfaces that will not be removed, surface wipe samples for iodine shall not exceed a concentration of 22 µg/100 cm<sup>2</sup>.

In this case, the northwest upstairs bedroom contained heavily yellowed walls that were left in place by KEH. Contrary to mandatory State requirements, the surfaces were not evaluated for iodine contamination. In their report, KEH states:

Sampling for surface or airborne iodine or any other compounds typically associated with methamphetamine production was not conducted at the Site as it had been subject to air-out for at least a year prior to the assessments described herein. Residue of such contaminants was not observed or suspected on any surfaces subsequent to cleanup.

However, there are no such regulatory exemptions that permit the consultant to forgo the mandatory sampling if the property has been “aired-out” and indeed, such “airing-out” would not reduce the surface contamination of iodine that was still clearly visible during our September 4, 2013 assessment.

Furthermore, there was considerable and profound visible evidence of yellow staining (indicating potential iodine release) throughout the entire structure during the KEH initial assessment.

### ***Low Probability Surfaces (§ 6.1 )***

State regulations require that samples be collected from:

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



This requirement is part and parcel of the post-mitigation sampling theory which requires the following:

Post-Decontamination sampling

In post-decontamination sampling, the hypothesis is made that the area is non-compliant, and data is collected to test the hypothesis. The role of the consultant in post decontamination sampling is not to demonstrate that the area is “clean,” but rather, using biased sampling, to diligently attempt to prove that the area is not clean. The lack of data supporting the hypothesis leads the consultant to accept the null hypothesis and conclude that the area is compliant.

A competent Industrial Hygienist, with proper training in illegal drug laboratory assessments, would know that certain surfaces should not be sampled since those surfaces will be expected to have the LOWEST levels of contamination. For example, a legitimately trained Industrial Hygienist would not sample bathroom plumbing fixtures where water has actively run, since these surfaces have virtually no probability of being contaminated.

However, in this property, contrary to State regulations, those are exactly the areas sampled by KEH in the upstairs bathroom; and why those sample results were “not detected.”

Similarly, we see that low probability surfaces (and prohibited surfaces) were sampled in the basement southeast bedroom by KEH. By contrast, pursuant to good sampling theory, FACTs selected the copper pipe in the room; this is why the KEH sample was 0.096 µg/100cm<sup>2</sup> and the FACTs sample was approximately 60 times higher.

***Prohibited Sampling Technique (Section 6.2.1)***

Mandatory Colorado regulations allow composite sampling only under specific site conditions. According to Colorado Regulations:

6.2.1. Discrete sampling is required in all cases, except as provided in 6.2.2 of these regulations.

6.2.2. Composite sampling may only be conducted in situations where contamination is expected to be relatively evenly dispersed throughout a given area, and composite sampling will provide an accurate representation of the area sampled, as described in Appendix A.

A legitimate Industrial Hygienist, trained in the aspects of illegal drug laboratory assessments, would have known that contamination under the circumstances at the Xxxroe property, would exhibit very large spatial variation and would not be “expected to be relatively evenly dispersed throughout a given area.”

A properly trained Industrial Hygienist would have known that field data from fully characterized properties exhibit a lognormal distribution (large variations of concentration). That is, the contamination under the circumstances of the subject property will never be “...expected to be relatively evenly dispersed throughout a given

---

<sup>4</sup> Surface weighted average of three samples



area...” and the geometric standard deviations can be as large as 3.0. This distribution is similar to that reported elsewhere.<sup>5, 6</sup>

Indeed, if we simply look at the FACTs data from the samples we collected on September 4, 2013, we see exactly the type of lognormal variation expected; the geometric standard deviation of the data is a whopping 8.97 and the one-tail Percentage Point of a Shapiro-Wilks W Test was 0.866 and the Gaussian distribution was 0.5791 and was therefore, rejected. However, the lognormal distribution W Test = 0.9065, was not rejected.

Therefore, the concentrations did not (and could not have been expected) “...expected to be relatively evenly dispersed throughout a given area...” and composite sampling for this property was prohibited. Therefore, strictly speaking, ALL of the samples collected by KEH in this property are invalid.

### ***Missing Documentation***

In the final report, the consultant is required to include certain materials. Many of those items have already been addressed in the discussion on the Preliminary Assessment above and will not be repeated here.

#### **Section 8.15**

In the final documentation, the consultant is required to include:

8.15. A description of the decontamination procedures used and a description of each area that was decontaminated.

We do not see where that information was included in the final documentation (provided to FACTs) as required.

#### **Section 8.16**

In the final documentation, the consultant is required to include:

8.16. A description of the removal procedures used and a description of areas where removal was conducted, and the materials removed.

We do not see where that information was included in the final documentation (provided to FACTs) as required.

#### **Section 8.17**

In the final documentation, the consultant is required to include:

8.17. A description of the encapsulation procedures used and a description of the areas and/or materials where encapsulation was performed.

---

<sup>5</sup> Washington State Department of Health: Summary Results from a Pilot Study to Evaluate Variability and Distribution of Methamphetamine Residue in Remediated Residential Illegal Drug Labs, as reported in NIOSH Method 9106 (DRAFT)

<sup>6</sup> Martyny JW, Arbuckle SL, McCammon CS, Esswein EJ, Erb N, *Chemical Exposures Associated with Clandestine Methamphetamine Laboratories*, ( [http://www.njc.org/pdf/chemical\\_exposures.pdf](http://www.njc.org/pdf/chemical_exposures.pdf) , May 10, 2004).



We do not see where that information was included in the final documentation (provided to FACTs) as required.

**Section 8.18**

In the final documentation, the consultant is required to include:

8.18. A description of the waste management procedures used, including handling and final disposition of wastes.

We do not see where that information was included in the final documentation (provided to FACTs) as required.

**Section 8.19**

In the final documentation, the consultant is required to include:

8.19. A description of the location and results of post-decontamination samples, including a description of sample locations and a figure with sample locations and identification.

We do not see where that information was included in the final documentation (provided to FACTs) as required.

