

Tim,

I'm still in the process of reviewing the draft, and will send specific comments when my review is complete, but I must express my dismay at the fact that much of this appears to have been taken verbatim from our regulation

<http://www.cdphe.state.co.us/regulations/boardofhealth/101403methlabrules.pdf>

While I don't mind the idea of this standard mirroring our regulation, I have a fundamental problem with something taken from the public domain and being incorporated into a standard that must be purchased. If this standard is going to be published, I think at a minimum it should include a statement that it is primarily based on the Colorado regulation. And given that, why should they buy this from ASTM when they can get it free from us.

Please call if you want to discuss this issue further.

Colleen Brisnehan
Hazardous Materials and Waste Management Division Colorado Department of Public Health and Environment
(303) 692-3357
FAX: (303) 759-5355