



FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.

**Final Verification Sampling and
DECISION STATEMENT
of an
Identified Illegal Drug Laboratory
at:**

**Motel 6
4103 North Elizabeth St.
Pueblo, CO 81008-2009
Room 145
and
Room 146**

Prepared for:

Motel 6
4103 North Elizabeth St.
Pueblo, CO 81008-2009

Prepared by:

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

March 2, 2012



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EXECUTIVE SUMMARY

On Sunday, January 22, 2012, Pueblo (Colorado) Police Department performed a law enforcement action in Room 145 of the Motel 6 located at 4103 North Elizabeth St., Pueblo, CO (the subject property). During this action, police reportedly recovered approximately eight grams of methamphetamine as well as methamphetamine paraphernalia in the room. The action resulted in “discovery” and “notification” of an “Illegal Drug Laboratory” as defined in CRS 25-18.5-101 *et seq*, and which subsequently triggered Colorado State Board of Health Regulation 6 CCR 1014-3.

On January 26, 2012, Forensic Applications Consulting Technologies, Inc. (FACTs) was contracted by the Registered Owner of the subject property to perform a standard State-mandated Preliminary Assessment (PA), and FACTs produced its report on February 7, 2012.

Samples taken during the PA conclusively demonstrated the presence of widespread and noncompliant methamphetamine contamination throughout Room 145 and Room 146. Sampling confirmed trace amounts of methamphetamine had spread to Rooms 254 (directly above Room 145) and Room 144 (one of the rooms adjacent to Room 145), but at levels that are not of regulatory or toxicological concern.

Rooms 145 and 146 and all items contained therein were found to be noncompliant and were subjected to remediation.

From February 7, 2012 through February 17, 2012 a recognized and authorized remediation contractor, (Crystal Clean Decontamination LLC) performed decontamination operations in the noncompliant areas.

On February 17, 2012, FACTs personnel performed verification inspections and sampling pursuant to State Regulations. Those inspections and sampling indicated the subject areas were in full compliance with State regulations.

Based on the analytical results of the objective sampling, and based on our observations, and based on the totality of the circumstances, FACTs concludes that insufficient information exists to support the hypothesis that any assessed area in the property is noncompliant.

Therefore, pursuant to State Board of Health Regulations, FACTs accepts the null hypothesis, and is required by State Regulation to issue this **DECISION STATEMENT** and hereby declare the subject property compliant with CRS 25-18.5-103 (2).

FACTs makes the recommendation to the Governing Body for this subject property to allow immediate reoccupancy of the subject property without further action.



REGULATORY REQUIREMENTS

Federal Requirements

All work performed by FACTs was consistent with OSHA regulations. The Remediation Contractor was responsible for ensuring its own compliance with OSHA. FACTs has no firsthand knowledge of the remediator's actions, activities or procedures at the subject property. However, 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.¹

After a property has been remediated, an authorized 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 noncompliant,² that area shall be deemed to be compliant with CRS §25-18.5-103 (2) and the Industrial Hygienist shall release the property.³

In order for a proper final declaration to be made, a final decontamination verification assessment must be performed by an authorized Industrial Hygienist as defined in CRS §24-30-1402. For this subject property, 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

¹ 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.

² No guarantee is ever made or implied that the property is completely free of contamination. Rather, a reasonable, standardized approach to decontamination is executed.

³ 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.



additionally qualified and authorized to perform the necessary testing and issue this document.

According to 6-CCR 1014-3, specific mandatory information must be presented in the final verification assessment. Included with this discussion is a DVD which contains mandatory information. This Decision Statement is not complete without the DVD. Table 1, below, summarizes the mandatory information:

Mandatory Final Documents 6-CCR1014-3	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 figures	<i>Carl</i>
§8.14	FACTs health and safety procedures in accordance with OSHA	<i>Carl</i>
§8.15	Contractor's description of decontamination procedures and each area that was decontaminated	<i>Carl</i>
§8.16	Contractor's description of removal procedures each area where removal was conducted, and the materials removed	<i>Carl</i>
§8.17	Contractor's description of encapsulation areas and materials	<i>Carl</i>
§8.18	Contractor's description of waste management procedures	<i>Carl</i>
§8.19	Drawing, location and results of final verification samples	<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>
NA	Analytical Laboratory Reports	<i>Carl</i>
	FACTs final closeout inventory document	<i>Carl</i>
	FACTs Field Sampling Forms	<i>Carl</i>

Note 1: See the Preliminary Assessment dated February 7, 2012 (included with this Decision Statement on the DVD) and filed with the appropriate Governing Body.

Table 1
Inventory of Mandatory Final Information



VERIFICATION SAMPLING

Inspection

During the final inspection of the subject property, FACTs made no visual observations that supported the primary hypothesis of noncompliance.

Upon completion of the final verification inspection, FACTs performed verification sampling.

Sample Collection

During the post mitigation verification sampling, wipe samples were used in our decision making process.

Exclusively, discrete samples were collected from suitable surfaces at the subject property. All samples were collected by FACTs in a manner consistent with State Regulation 6-CCR 1014-3.

For this property, it was FACTs' professional opinion that, based on the totality of the circumstances, authoritative judgmental biased sampling was the most appropriate method.

Surfaces with a low intrinsic probability of contamination were excluded from consideration (e.g. windows, water basins or water catchment areas, faucets, etc.). Instead, FACTs selected areas that, based on our observations, had the highest probability of bearing contamination.

Wipe Samples

The wipe sample medium was individually wrapped commercially available Johnson & Johnson™ gauze pads (FACTs Lot# G1ØØ6). Each pad was moistened with reagent grade methyl alcohol (FACTs Lot# A11Ø1). Each gauze pad was prepared in a clean environment and inserted into an individually identified plastic centrifuge tube with a screw-cap.

Prior to the collection of each sample, the Industrial Hygienist donned a fresh pair of surgical gloves and wiped the measuring ruler with a disposable alcohol wipe to prevent the possibility of cross-contamination.

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, under chain of custody, to Reservoirs Environmental Laboratories, in Denver, Colorado for analysis by GCMS.

Sample Results

In the table below, we have presented the results of the final verification sampling. In the following table, the “Result” and “Criterion” values are expressed as µg/100 cm².

Date	Sample	Location	Surface (cm ²)	Result	Criterion	Status
01/30/12	PM013012-02	Field Spike	NA	3.59*	4.0*	PASS
01/30/12	PM013012-03	Field Blank	NA	BDL	<0.05*	PASS
01/30/12	PM013012-05	Room 144 top of light fixture in bathroom	500	0.35	0.50	PASS
01/30/12	PM013012-06	Room 254 top of light fixture in bathroom	500	0.06	0.50	PASS
02/17/12	MM021712-01	Room 145 Bathroom door jamb	501	0.16	0.50	PASS
02/17/12	MM021712-03	Room 145 room mirror	500	0.01	0.50	PASS
02/17/12	MM021712-02	Field Blank	NA	BDL	<0.05*	PASS
02/17/12	MM021712-04	Room 146 Door frame	501	0.19	0.50	PASS

*Absolute mass in µg; “BDL” indicates that the concentration was below the reported detection limit.

Table 2
Summary of Final Sample Results

Quality Assurance/Quality Control Precautions

Field Blanks

For QA/QC purposes, and in accordance with State requirements, at least one field blank was submitted for every ten wipe samples. The field blanks were randomly selected from 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(s) would be submitted as a blank. To ensure the integrity of the blank, laboratory personnel were not informed which specific sample(s), if any, may have been blank.



Field Spikes

Although not required by regulations, as part of our general QA/QC protocol, FACTs regularly submits surreptitious spikes to the analyzing laboratory. "Spiked" samples consist of randomly selecting sampling assemblies that are submitted to a third party independent laboratory for the inclusion of known amounts of methamphetamine into the selected samples. The spiked samples are then surreptitiously submitted with the normal project samples. To ensure the integrity of the spikes, laboratory personnel are unaware of the presence or nature of the spikes. The spikes allow FACTs to determine the adequacy of the laboratory in recovering known amounts of methamphetamine from the samples. Sample results reported in the Decision Statement are then corrected to the spike recovery. It is for this reason that unless the correction is employed an auditor will not be able to reconcile the laboratory report with the reported concentrations.

In this case, both spikes contained 4 µg of *d*-methamphetamine (only one of the spikes is shown with the data, since the other spike was part of a different project, but was used with the February 17, 2012 sampling visit). For the first data set, the laboratory reported recovering 88% of the spike amount, which is within tolerance for environmental samples.

For the second data set, not shown in the results table, was a spike whose recovery was 90%, which is also within accepted tolerances

Therefore, when a reader is reconciling the reported concentrations with the presented laboratory report, the spike correction must be considered.

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. Prior to entering the property, FACTs personnel donned fresh disposable Tyvek suits, and/ or Tyvek booties. The rulers used to delineate sample areas were decontaminated with disposable alcohol wipes between each sample.

Sample Locations

The drawings below identify the locations of each final verification sample. Shaded locations indicate the clearance sample collected during the Preliminary Assessment.



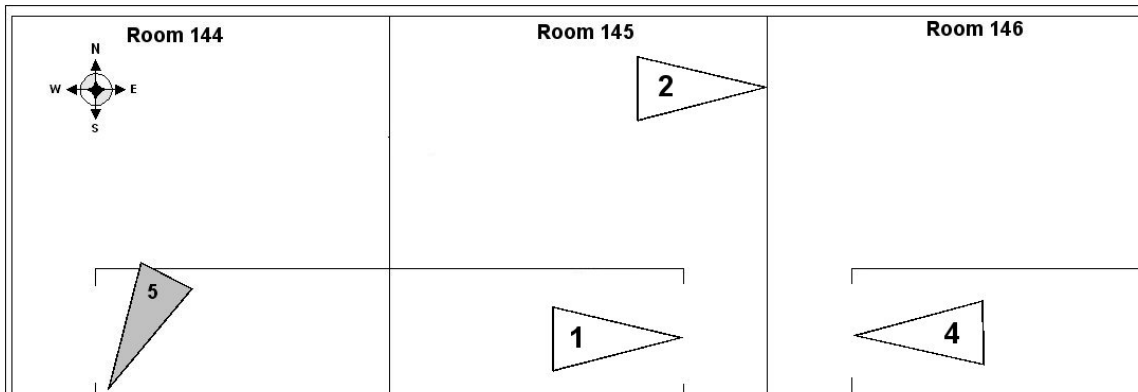


Figure 1
Final Verification Samples – Ground Floor

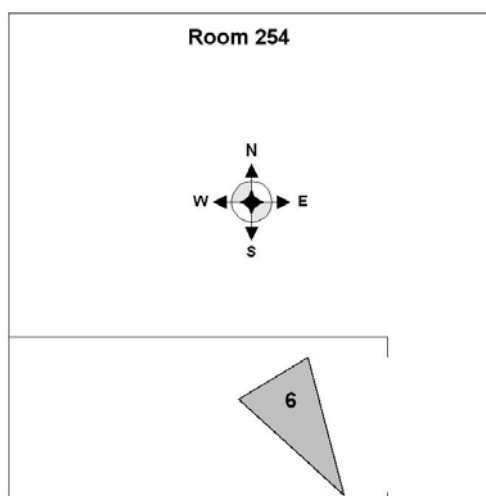


Figure 2
Final Verification Samples – Second Floor

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.

January 30, 2012 Set

MDL was not given; LOQ was reported as 0.05 $\mu\text{g}/100\text{cm}^2$, FACTs recognizes that this information cannot be correct as the LOQ cannot be expressed as $\mu\text{g}/100\text{cm}^2$ – this is a non fatal error associated with the analyzing laboratory; MBX <MDL, FACTs recognizes that this information also cannot be correct as the MBX cannot be expressed as $\mu\text{g}/100\text{cm}^2$ – this is a non fatal error associated with the analyzing laboratory; LCS mass was not given, however, the laboratory reported 115% recovery, RPD was not given. Matrix spike mass was not given however the recovery was given as 114% (RPD was not given); Matrix spike Dup mass was not given, and the recovery was not given, however the RPD was reported to have been 4%. Surrogate spike recoveries are not



given by the laboratory and are unknown. FACTs reagents: MeOH lot # A1101 <MDL for n=28; Gauze lot # G1006 <MDL for n=42.

February 17, 2012 Set

MDL was not given; LOQ was reported as 0.05 µg/100cm², FACTs recognizes that this information cannot be correct as the LOQ cannot be expressed as µg/100cm² – this is a non fatal error associated with the analyzing laboratory; MBX <MDL, FACTs recognizes that this information also cannot be correct as the MBX cannot be expressed as µg/100cm² – this is a non fatal error associated with the analyzing laboratory; LCS mass was not given, however, the laboratory reported 95% recovery, RPD was not given. Matrix spike mass was not given however the recovery was given as 98% (RPD was not given); Matrix spike Dup mass was not given, and the recovery was not given, however the RPD was reported to have been 4%. Surrogate spike recoveries are not given by the laboratory and are unknown. FACTs reagents: MeOH lot # A1101 <MDL for n=29; Gauze lot # G1006 <MDL for n=42.

There is nothing in the QA/QC that would indicate the data did not meet the data quality objectives; there is insufficient information included in the laboratory report to determine if the data exhibit bias.

CONCLUSIONS

Diligent adherence to State regulations does not guarantee that a remediated property will be completely free of all residual methamphetamine. 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, inaccessible places in the residence are presumed to contain *de minimis* methamphetamine residue. These residues are not considered to be toxicologically significant, and are not within the definition of “contamination” as found in State regulation. Furthermore, 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 models⁴ described in the supporting documentation for 6-CCR 1014-3, suggest that exposure to *de minimis* concentrations 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) do not meet the definition of “contamination.”

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

⁴ *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 regulations require the Industrial Hygienist to thus conclude that the area is compliant.

In this case, there were no visual indicators that supported the hypothesis and 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 Rooms 145 and 146 at the subject property located at 4103 North Elizabeth St., Pueblo, CO, compliant as defined in 6-CCR 1014-3. We recommend that the Governing Body responsible for this subject property immediately release this property for occupancy.

To avail of the civil liability immunity provided by CRS §25-18.5-103(2) and to ensure complete compliance with State regulations, this Decision Statement must be submitted to the Governing Body with jurisdiction over the property. Based on the best information available, The Governing Body is:

Chad Wolgram
Pueblo City-County Health Department
101 W. 9th Street
Pueblo, CO 81003

FACTs has supplied a copy of this document, complete with all appendices and the digital disc, to the Governing Body via email and registered mail through the US Post Office.

-**END**-



APPENDIX A
REMIEDIATOR'S SUBMITTALS



Crystal Clean Decontamination, llc



A meth lab clean-up and bio-recovery company

2594 S. Wolff St. Denver CO. 80219

303.884.5489 direct 303.975.9972 fax

priley@crystalcleandecon.com

www.crystalcleandecon.com

Decontamination Summary per 6 CCR 1014-3

Re: 4103 N. Elizabeth St Pueblo CO. Rooms # 145 & #146

Date: February 25, 2012

§8.15 Contractor's description of decontamination procedures and each area that was decontaminated.

- All areas being decontaminated were contained under negative air pressure with HEPA filtration prior to and during the decontamination.
- Subject property consisted of two, 250 square foot studio style hotel rooms, located on the ground floor and separated by a common wall.
- All exposed surfaces areas were decontaminated using industrial equipment and detergent.

§8.16 Contractor's description of removal procedures each area where removal was conducted and the materials removed.

- One thirty yard roll off container was placed in the parking lot of the subject property.
- All carpeting, padding, tact strip, beds, mattresses, Heat pump, window coverings, light fixtures and other miscellaneous debris were removed and disposed of.
- The HVAC system including all duct work and vent covers were removed bagged and disposed of.

§8.17 Contractor's description of encapsulation areas and materials

No encapsulation was preformed.

§8.18 Contractor's description of waste management procedures

- A total of one 30 yard roll off container was used.
- Container provided by Waste connections of Colorado. Landfill was notified that waste was classified as non-hazardous solid waste contaminated with Meth residue.
- All containers were covered and secured prior to their removal from the site.

Peter C. Riley
President
Crystal Clean
Decontamination LLC.
303.884.5489

priley@crystalcleandecon.com

www.crystalcleandecon.com



WASTE CONNECTIONS
OF COLORADO INC.
Connect with the Future™

COLORADO LANDFILL DIVISION
NON-HAZARDOUS SPECIAL WASTE MANIFEST

112 001876 S

GENERATOR

Generator Name Motello Generating Location Same
Address 4103 N. Elizabeth St Address Same
Pueblo, CO 81008
Phone No. 719-543-6221 Phone No. Same

WCI Waste Code

Description of Waste

Moth Contaminated Waste

Quantity

Units

30

- Units
- D - Drums
 - B - Bags
 - Y - Yards
 - T - Tons
 - O - Other

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations; AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restriction, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

Brandie Martinez
Generator Authorized Agent Name (Print/Type)

Brandie Martinez
Signature

021612
Shipment Date

TRANSPORTER

Transporter Name _____ Phone No. _____
Address _____ Truck # _____
Vehicle License No./State _____

Acknowledgment of receipt of materials.

Driver Name (Print/Type)

Signature

Shipment Date

DESTINATION

SITE INFORMATION

- Pueblo - 5715 Highway 78 West • Pueblo, CO 81005 • 719-948-2900
- Fountain - 10000 Squirrel Creek Road • Fountain, CO • 719-382-9661

Discrepancy Indication Space _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

Authorized Agent Name (Print/Type)

Signature

Receipt Date

DISPOSAL INSTRUCTIONS

ASBESTOS CELL	
BURY AT BASE	
DIG A TRENCH	
MIX WITH REFUSE	

SAFETY PRECAUTIONS

AVOID SKIN & EYE CONTACT	
AVOID BREATHING DUST	

































DISPOSAL COORDINATES

APPENDIX B
POST-REMEDIATION PHOTOGRAPH LOG SHEET



POST-REMEDIATION PHOTOGRAPH LOG SHEET

FACTs project name: Motel 6	Form # ML9
Date: February 17, 2012	
Reporting IH:	Caoimhín P. Connell, Forensic IH

Name ▲	Date Picture Taken
 Room 145	
 Room 145	1/17/2012 1:28 PM
 Room 145 (2)	1/17/2012 1:28 PM
 Room 145 (3)	1/17/2012 1:28 PM
 Room 145 (4)	1/17/2012 1:29 PM
 Room 145 (5)	1/17/2012 1:29 PM
 Room 145 (6)	1/17/2012 1:29 PM
 Room 145 (7)	1/17/2012 1:29 PM
 Room 145 (8)	1/17/2012 1:29 PM
 Room 145 (9)	1/17/2012 1:29 PM
 Room 145 (10)	1/17/2012 1:29 PM
 Room 145 (11)	1/17/2012 1:30 PM
 Room 145 (12)	1/17/2012 1:30 PM
 Room 145 (13)	1/17/2012 1:30 PM
 Room 145 (14)	1/17/2012 1:30 PM
 Room 145 (15)	1/17/2012 1:45 PM
 Room 145 (16)	1/17/2012 1:45 PM
 Room 145 (17)	1/17/2012 1:46 PM
 Room 145.THM	
 Room 146	1/17/2012 1:53 PM
 Room 146 (2)	1/17/2012 1:53 PM
 Room 146 (3)	1/17/2012 1:53 PM
 Room 146 (4)	1/17/2012 1:53 PM
 Room 146 (5)	1/17/2012 1:53 PM
 Room 146 (6)	1/17/2012 1:53 PM
 Room 146 (7)	1/17/2012 1:53 PM
 Room 146 (8)	1/17/2012 1:53 PM
 Room 146 (9)	1/17/2012 1:53 PM
 Room 146 (10)	1/17/2012 1:54 PM
 Room 146 (11)	1/17/2012 1:54 PM
 Room 146 (12)	1/17/2012 1:54 PM
 Room 146 (13)	1/17/2012 1:54 PM



APPENDIX C
FINAL CERTIFICATION SIGNATURE SHEET



FINAL SAMPLING CHECKLIST

FACTs project name:	Motel 6	Form # ML18
Date: February 24, 2012		
Reporting IH:	Caoimhín P. Connell, Forensic IH	

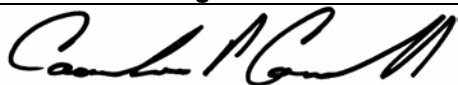



Space #	Cleared with	General Sampling Considerations	
1	PM013012-05	Floor Space Area of Lab (ft ²)	1,008
2	MM021712-01 MM021712-02	One extra sample is required for every 500 ft ² of floor space >1,500ft ² . Enter number of <u>extra</u> samples required:	0
3	MM021712-04	Enter minimum number of final samples required based on floor space.	5
4	PM013012-06	Enter Number of Functional Spaces to be included	4
This Space is Blank		Enter the minimum number of sample required based on the number of functional spaces	4
		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?	No
		For vehicles that are merely functional spaces a 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
		Enter total number of samples to be collected.	5
		One BX must be included for every 10 samples. Enter the number of BX required.	1
		Enter total number of samples/BXs required	6
		Enter total number of samples/BXs actually collected for clearance	7
		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	



CERTIFICATION, VARIATIONS AND SIGNATURE SHEET

FACTs project name: Motel 6	Form # ML14
Date: March 2, 2012	
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 the property has been decontaminated in accordance with the procedures set forth in 6 CCR 1014-3, § 5.	See Body of Report
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:

At the time of the preparation of this report, the waste manifest, signed by the receiving landfill has not been received. When the manifest is received from the decontamination contractor, FACTs will forward an electronic copy of the manifest to the property owner, and to the Governing Body.

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: March 2, 2012



APPENDIX D
FIELD DATA SHEETS AND ANALYTICAL SUBMITTALS



Forensic Applications

Final Report

RES 230020-1

February 24, 2012

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Cover Sheet	1
Letter	2
Report / Data	3
Quality Control Data	4
Chain of Custody	5

February 24, 2012

Laboratory Code: RES
Subcontract Number: NA
Laboratory Report: RES 230020-1
Project # / P.O. #: Pueblo
Project Description: None Given

Caoimhin Connell
Forensic Applications
185 Bounty Hunter Ln.
Bailey CO 80421

Dear Customer,

Reservoirs Environmental, Inc. is an analytical laboratory accredited for the analysis of Environmental matrices by the National Environmental Laboratory Accreditation Program, Lab Certification #E871030. The laboratory is currently proficient in the ERA PAT Program.

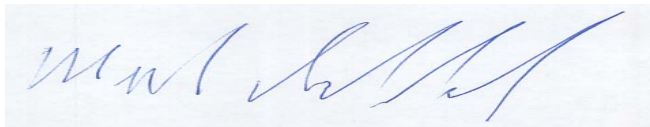
Reservoirs has analyzed the following sample(s) using Gas Chromatography Mass Spectrometry (GC/MS) / Gas Chromatography Flame Ionization Detector (GC/FID) per your request. The analysis has been completed in general accordance with the appropriate methodology as stated in the analysis table. Results have been sent to your office.

RES 230020-1 is the job number assigned to this study. This report is considered highly confidential and the sole property of the customer. Reservoirs Environmental, Inc. will not discuss any part of this study with personnel other than those authorized by the client. The results described in this report only apply to the samples analyzed. This report shall not be reproduced except in full, without written approval from Reservoirs Environmental, Inc. Samples will be disposed of after sixty days unless longer storage is requested. If you should have any questions about this report, please feel free to call me at 303-964-1986.

Sincerely,



Jeanne Spencer Orr
President



Analyst(s): _____
Mike Schaumloeffel

RESERVOIRS ENVIRONMENTAL, INC.

NVLAP Accredited Laboratory #101896
AIHA Certificate of Accreditation #480 LAB ID 101533

TABLE I. ANALYSIS: METHAMPHETAMINE BY WIPE

RES Job Number: **RES 230020-1**
Client: **Forensic Applications**
Client Project Number / P.O.: **Pueblo**
Client Project Description: **None Given**
Date Samples Received: **February 17, 2012**
Analysis Type: **Methamphetamine by GCMS**
Turnaround: **5 Day**
Date Samples Analyzed: **February 24, 2012**

Client ID Number	Lab ID Number	Reporting Limit (µg)	METHAMPHETAMINE CONCENTRATION (µg)
M6M021712-01	EM 866066	0.05	0.72
M6M021712-02	EM 866067	0.05	BRL
M6M021712-03	EM 866068	0.05	0.13
M6M021712-04	EM 866069	0.05	0.85

* Unless otherwise noted all quality control samples performed within specifications established by the laboratory.

Data QA _____

RESERVOIRS ENVIRONMENTAL, INC.

NVLAP Accredited Laboratory #101896
AIHA Certificate of Accreditation #480 LAB ID 101533

QUALITY CONTROL: METHAMPHETAMINE BY WIPE

RES Job Number: **RES 230020-1**
Client: **Forensic Applications**
Client Project Number / P.O.: **Pueblo**
Client Project Description: **None Given**
Date Samples Received: **February 17, 2012**
Analysis Type: **Methamphetamine by GCMS**
Turnaround: **5 Day**
Date Samples Analyzed: **February 24, 2012**

Quality Control Batch	Reporting Limit ($\mu\text{g}/100\text{cm}^2$)	Matrix Blank ($\mu\text{g}/100\text{cm}^2$)	Matrix Duplicate (% RPD)	Matrix Spike (% Recovery)	Laboratory Control Sample (% Recovery)
1	0.05	BRL	4	98	95

* Unless otherwise noted all quality control samples performed within specifications established by the laboratory.
** These analytical results meet NELAC requirements.

Data QA _____

Forensic Applications

Final Report

RES 228840-1

February 7, 2012

	Page
Cover Sheet	1
Letter	2
Report / Data	3
Quality Control Data	4
Chain of Custody	5

February 7, 2012

Laboratory Code: RES
Subcontract Number: NA
Laboratory Report: RES 228840-1
Project # / P.O. #: Pueblo
Project Description: None Given

Caoimhin Connell
Forensic Applications
185 Bounty Hunter Ln.
Bailey CO 80421

Dear Customer,

Reservoirs Environmental, Inc. is an analytical laboratory accredited for the analysis of Environmental matrices by the National Environmental Laboratory Accreditation Program, Lab Certification #E871030. The laboratory is currently proficient in the ERA PAT Program.

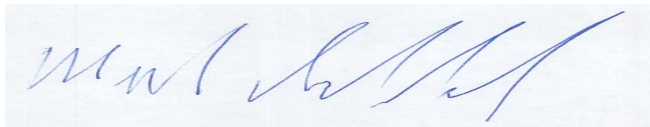
Reservoirs has analyzed the following sample(s) using Gas Chromatography Mass Spectrometry (GC/MS) / Gas Chromatography Flame Ionization Detector (GC/FID) per your request. The analysis has been completed in general accordance with the appropriate methodology as stated in the analysis table. Results have been sent to your office.

RES 228840-1 is the job number assigned to this study. This report is considered highly confidential and the sole property of the customer. Reservoirs Environmental, Inc. will not discuss any part of this study with personnel other than those authorized by the client. The results described in this report only apply to the samples analyzed. This report shall not be reproduced except in full, without written approval from Reservoirs Environmental, Inc. Samples will be disposed of after sixty days unless longer storage is requested. If you should have any questions about this report, please feel free to call me at 303-964-1986.

Sincerely,



Jeanne Spencer Orr
President



Analyst(s): _____
Mike Schaumloeffel

RESERVOIRS ENVIRONMENTAL, INC.

NVLAP Accredited Laboratory #101896
AIHA Certificate of Accreditation #480 LAB ID 101533

TABLE I. ANALYSIS: METHAMPHETAMINE BY WIPE

RES Job Number: **RES 228840-1**
Client: **Forensic Applications**
Client Project Number / P.O.: **Pueblo**
Client Project Description: **None Given**
Date Samples Received: **January 31, 2012**
Analysis Type: **Methamphetamine by GCMS**
Turnaround: **5 Day**
Date Samples Analyzed: **February 7, 2012**

Client ID Number	Lab ID Number	Reporting Limit (µg)	METHAMPHETAMINE CONCENTRATION (µg)
PM013012-01	EM 858316	0.05	5.29
PM013012-02	EM 858317	0.05	3.59
PM013012-03	EM 858318	0.05	BRL
PM013012-04	EM 858319	0.05	5.70
PM013012-05	EM 858320	0.05	1.58
PM013012-06	EM 858321	0.05	0.26
PM013012-07	EM 858322	0.05	3.98
PM013012-08	EM 858323	NA - Sample Not Submitted	
PM013012-09	EM 858324	NA - Sample Not Submitted	
PM013012-10	EM 858325	NA - Sample Not Submitted	

* Unless otherwise noted all quality control samples performed within specifications established by the laboratory.

Data QA _____

RESERVOIRS ENVIRONMENTAL, INC.

NVLAP Accredited Laboratory #101896
AIHA Certificate of Accreditation #480 LAB ID 101533

QUALITY CONTROL: METHAMPHETAMINE BY WIPE

RES Job Number: **RES 228840-1**
Client: **Forensic Applications**
Client Project Number / P.O.: **Pueblo**
Client Project Description: **None Given**
Date Samples Received: **January 31, 2012**
Analysis Type: **Methamphetamine by GCMS**
Turnaround: **5 Day**
Date Samples Analyzed: **February 7, 2012**

Quality Control Batch	Reporting Limit ($\mu\text{g}/100\text{cm}^2$)	Matrix Blank ($\mu\text{g}/100\text{cm}^2$)	Matrix Duplicate (% RPD)	Matrix Spike (% Recovery)	Laboratory Control Sample (% Recovery)
1	0.05	BRL	3	114	115

* Unless otherwise noted all quality control samples performed within specifications established by the laboratory.
** These analytical results meet NELAC requirements.

Data QA _____

Due Date: 2.7.12
 Due Time: 4:00

RES 228840

Page 1 of 1



After Hours Cell Phone: 720-339-9228

INVOICE TO: (IF DIFFERENT)

CONTACT INFORMATION:

Company: Forensic Applications, Inc
 Address: 185 Bounty Hunters Lane
 Bailey, CO 80421

Contact: Caoimhin P. Connell
 Phone: 303-903-7494
 Fax: V-3128
 Callpager: Paid

Project Number and/or P.O. #: Pueblo
 Project Description/Location: admin@forensic-applications.com

ASBESTOS LABORATORY HOURS: Weekdays: 7am - 7pm	REQUESTED ANALYSIS	VALID MATRIX CODES	LAB NOTES:
PLM / PCM / TEM RUSH (Same Day) PRIORITY (Next Day) STANDARD (Rush PCM = 2hr, TEM = 6hr.)	METALS - Analyte(s) RCRA 8, TCLP, Welding Fume, Metals Scan	Air = A Bulk = B Dust = D Paint = P Soil = S Wipe = W Swab = SW F = Food Drinking Water = DW Waste Water = WW O = Other	
CHEMISTRY LABORATORY HOURS: Weekdays: 8am - 5pm Metal(s) / Dust RUSH 24 hr. 3-5 Day RCRA 8 / Metals & Welding RUSH 5 day 10 day Fume Scan / TCLP RUSH 24 hr. X 5 Day	MICROBIOLOGY E.coli O157:H7, Coliforms, S.aureus Salmonella, Listeria, E.coli, APC, Y & M Mold	**ASTM E1792 approved wipe media only**	
MICROBIOLOGY LABORATORY HOURS: Weekdays: 9am - 6pm E.coli O157:H7, Coliforms, S.aureus Salmonella, Listeria, E.coli, APC, Y & M Mold	ORGANICS - METH		
Special Instructions: Standard REI Reportable limits. Please report all samples as total µg. Please use entire sample.	PLM - Short report, Long report, Point Count TEM - AHERA, Level II, 7402, ISO, +/-, Quant, Semi-quant, Micro-vac, ISO-Indirect Preps PCM - 7400A, 7400B, OSHA DUST - Total, Respirable METALS - Analyte(s) RCRA 8, TCLP, Welding Fume, Metals Scan	Matrix Code Containers Date Collected mm/dd/yyyy Time Collected hh:mm:ap	EM Number (Laboratory Use Only)

Client sample ID number	EM Number
1 PM013012-01	858316
2 PM013012-02	17
3 PM013012-03	18
4 PM013012-04	19
5 PM013012-05	20
6 PM013012-06	21
7 PM013012-07	22
8 PM013012-08	23
9 PM013012-09	24
10 PM013012-10	25

Number of samples received: 10 (Additional sal)

NOTE: REI will analyze incoming samples based upon information received and will not be responsible for analysis as indicated on this Chain of Custody. Signatures constitute an analytical services agreement will

Relinquished By: [Signature]
 Laboratory Use Only

Received By: [Signature]
 Results:

Date/Time: 1.31.12 4:00
 Carrier: AFMEX

Sample Condition: On Ice Yes / No
 Temp. (F) 27.0 Time 12:15P

Contact: Phone Email Fax
 Initials: Initials

APPENDIX E
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:	Motel 6	Form # ML15
Date	February 7, 2012	
Reporting IH:	Caoimhín P. Connell, Forensic IH	

Caoimhín P. Connell, who has been involved in clandestine drug lab (including meth-lab) investigations since 2002, is a consulting forensic Industrial Hygienist meeting the Colorado Revised Statutes §24-30-1402 definition of an "Industrial Hygienist." He has been a practicing Industrial Hygienist in the State of Colorado since 1987; and is the contract Industrial Hygienist for the National Center for Atmospheric Research.

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 was the lead instructor for the Colorado Division of Criminal Justice and has provided over 260 hours of methlab training for officers of over 25 Colorado Police agencies, 20 Sheriff's Offices, federal agents and probation and parole officers throughout 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, US Air Force, 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; he is a member of the Colorado Drug Investigators Association, the American Industrial Hygiene Association (where he serves on the Clandestine Drug Lab Work Group), the American Conference of Governmental Industrial Hygienists and the Occupational Hygiene Society of Ireland. Mr. Connell served as the Industrial Hygiene Subject Matter Expert for the Department of Homeland Security, IAB (Health, Medical, and Responder Safety SubGroup), from 2009 and was elected full member of the HMRS in 2011, and he conducted the May 2010 Clandestine Drug Lab Professional Development Course for the AIHA.

He has received over 144 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 US NHTSA, and 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" and is currently ARIDE Certified.

Mr. Connell is 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 250 assessments in illegal drug labs in Colorado, Nebraska and Oklahoma, and collected over 2,540 samples during assessments (a detailed list of drug lab experience is available on the web at):

<http://forensic-applications.com/meth/DrugLabExperience2.pdf>

He has extensive experience performing assessments pursuant to the Colorado meth-lab regulation, 6 CCR 1014-3, (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 services to private consumers, Indian Nations, state officials and Federal Government representatives with forensic services and 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 a coauthor of a 2007 AIHA Publication on methlab assessment and remediation.

185 BOUNTY HUNTER'S LANE, BAILEY, COLORADO 80421
PHONE: 303-903-7494 www.forensic-applications.com

APPENDIX F
COMPACT DIGITAL DISC

