

**Preliminary Assessment
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.

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EXECUTIVE SUMMARY

On Sunday, January 22, 2012, Pueblo (Colorado) Police Department performed a law enforcement action at Room 145 of the Motel 6 located at 4103 North Elizabeth St., Pueblo, CO (the subject property). During that action, police reportedly recovered approximately eight grams of methamphetamine as well as methamphetamine paraphernalia in the room. The law enforcement action met the definition of “discovery” and “notification” of an “Illegal Drug Laboratory” as defined in CRS 25-18.5-101 *et seq.*, 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). From January 26, 2012 to February 7, 2012, personnel from FACTs performed the PA pursuant to Colorado Regulation 6 CCR 1014-43, Part 4.

Samples taken during the PA conclusively demonstrated the presence of widespread methamphetamine contamination throughout Room 145 and Room 146. Sampling confirmed the presence of trace amounts of methamphetamine spread to Rooms 254 and Room 144.

The following areas in the structure were found to be noncompliant and will be scheduled for remediation:

- Room 145, and all items contained therein
- Room 146, and all items contained therein

Samples taken during the PA were designed to satisfy two regulatory aspects; Preliminary Assessment testing, and Final Verification Testing, pursuant to Section 7 of the Regulations. Pursuant to Regulation 6 CCR 1014-3:

Where the drug laboratory is located in a structure other than a single-family dwelling, the potential of fugitive emissions must be considered. For example, if the functional space was located in an hotel room, and evidence of contamination extended into the corridor, the elevator, the lobby, and one adjacent room, there would be four separate functional spaces to evaluate: 1) The primary hotel room, 2) the corridor/elevator complex 3) the lobby, 4) the adjacent hotel room.

Therefore, samples thus collected during the PA also permitted the exclusion from remediation the surrounding rooms, and the common portico.

Based on the totality of the circumstances, FACTs makes the following observations:

- Rooms 145 and 146 of the subject property exhibit overt noncompliance with Colorado’s methamphetamine cleanup standards.



- “Discovery” and “Notification” existed by virtue of the law enforcement activity.
- A noncompliant illegal drug lab, as that term is defined in CRS §25-18.5-101, existed at the subject property from at least January 22, 2012 forward, and continues to exist at the time of this Preliminary Assessment.
- A Class 1 Public Nuisance, as defined in CRS §16-13-303(1) existed at the subject property from at least Sunday, January 22, 2012 forward, and continues to exist at the time of this report.
- Each room, and the entire contents of each of the rooms, and the heating systems and all associated ductwork, must be decontaminated in a manner consistent with State regulations.
- Following the decontamination activities, a qualified Industrial Hygienist must perform the post-decontamination process and issue a Decision Statement before reentry or occupancy of the subject Rooms may occur.

REGULATORY REQUIREMENTS

Federal Requirements

All work associated with this PA was performed in a manner consistent with regulations promulgated by the Federal Occupational Safety and Health Administration (OSHA).

State Requirements

Preliminary Assessment

According to Colorado State Regulation 6-CCR 1014-3, following the discovery of an illegal drug lab, as that term is defined in CRS §25-18.5-101, and following “notification,” the property must either be demolished or a “Preliminary Assessment” must be conducted at that property to characterize extant contamination (if any), and to direct appropriate decontamination procedures (if any). Pursuant to these regulations, information obtained in the PA, and those findings, enter the public domain and are not subject to confidentiality.¹

An illegal drug laboratory is defined as:

CRS 25-18.5-101(2.7)... the areas where controlled substances...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.

Discovery of an illegal drug laboratory is said to have occurred when:

¹ Section 8.26 of 6 CCR 1014-3



CRS 25-18.5-103(1)(a) Upon notification from a peace officer that chemicals, equipment, or supplies indicative of an illegal drug laboratory are located on a property, or when an illegal drug laboratory used to manufacture methamphetamine is otherwise discovered and the property owner has received notice, the owner of any contaminated property shall meet the cleanup standards for property established by the board in section 25-18.5-102; except that a property owner may, at his or her option and subject to paragraph (b) of this subsection (1), elect instead to demolish the contaminated property. ...

The PA must be conducted according to specified requirements² by an authorized Industrial Hygienist as that term is defined in CRS §24-30-1402. This document, and all associated appendices and photographs, is the PA pursuant to those regulations. Included with this discussion is a read-only digital disc. The disc contains mandatory information and photographs required by State regulation for a PA. This PA is not complete without the digital disc and all associated support documents.

Pursuant to CRS §25-18.5-105, the subject property is deemed a “public health nuisance.” Pursuant to CRS §16-13-303, the subject property and all of its contents is deemed a Class 1 Public Nuisance. As such, the subject property must be remediated according to State Board of Health regulations 6-CCR-1014-3 or demolished (CRS §25-18.5-103).

County Requirements

According to the Pueblo County Department of Health, the County of Pueblo has no regulations over and above those specified by the State of Colorado.

City Regulations

According to the Pueblo County Department of Health, the City of Pueblo has no regulations over and above those specified by the State of Colorado.

Preliminary Hypothesis

During the PA, the initial hypothesis is made that the subject area is clean, and data are collected to find support for this hypothesis. Any reliable data that fails to support the hypothesis, including police records, visual clues of illegal production, storage, or use, or documentation of drug paraphernalia being present, is considered conclusive, and requires the Industrial Hygienist to accept the null hypothesis and declare the area non-compliant.³ The strength of evidence needed to reject the hypothesis is low, and is only that which would lead a reasonable person, trained in aspects of meth laboratories, to conclude the *presence* of methamphetamine, and/or its precursors or waste products as related to processing.

² Section 4 of 6 CCR 1014-3

³ This language and emphasis is verbatim from Appendix A (mandatory) of 6 CCR 1014-3



Contrary to common belief, sampling is **not** required during a PA; however, if sampling is performed, it is conducted in the areas with the highest probability of containing the highest possible concentrations of contaminants. According to the State regulations:⁴

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.

Initial Statement on Hypothesis Testing

Regarding this subject property, during the PA, FACTs initially accepted the primary regulatory null hypothesis that each functional space was noncompliant, and then pursuant to testing consistent with Section 7, 6 CCR 1014-3, FACTs challenged the noncompliance for each functional space.

Through that sampling, we determined that although methamphetamine was present in trace quantities in the surrounding rooms, in all but one room, the concentrations did not rise to the standard of “contaminant.”

Elements of the Preliminary Assessment

Specific mandatory information must be presented as part of the PA. This discussion, in its totality, contains the mandatory information for a PA as follows:

Mandatory Final Documents 6-CCR 1014-3	DOCUMENTATION	Included
§4.1	Property description field form	<i>Cal</i>
§§4.4, 4.5	Description of manufacturing methods and chemicals	<i>Cal</i>
§4.2	Law Enforcement documentation review discussion	<i>Cal</i>
§4.7	Description and Drawing of Storage area(s)	<i>Cal</i>
§4.8	Description and Drawing of Waste area(s)	<i>Cal</i>
§4.9	Description and Drawing of Cook area(s)	<i>Cal</i>
§§4.3, 4.6, 4.10	Field Observations field form	<i>Cal</i>
	FACTs Functional space inventory field form	<i>Cal</i>
§4.11	Plumbing inspection field form	<i>Cal</i>
	FACTs ISDS field form	NA
§4.12	Contamination migration field form or description	<i>Cal</i>
§4.13	Identification of common ventilation systems	<i>Cal</i>
§8.11	Description of the sampling procedures and QA/QC	<i>Cal</i>
§8.12	Analytical Description and Laboratory QA/QC	<i>Cal</i>
§8.13	Location and results of initial sampling with drawings	<i>Cal</i>
§8.14	FACTs health and safety procedures in accordance with OSHA	<i>Cal</i>
§8.15 - §8.19	These sections are not applicable to a Preliminary Assessment	
§8.20	FACTs Pre-remediation photographs and log	<i>Cal</i>
	FACTs Post-remediation photographs and log	NA

⁴ Section 4.6 of 6 CCR 1014-3



§8.21	FACTs SOQ	<i>Cal</i>
§8.22	Certification of procedures, results, and variations	<i>Cal</i>
§8.23	Mandatory Certification Language	<i>Cal</i>
§8.24	Signature Sheet	<i>Cal</i>
NA	Analytical Laboratory Reports	<i>Cal</i>
	FACTs final closeout inventory document	NA
	FACTs Field Sampling Forms	<i>Cal</i>

Table 1
Inventory of Mandatory Elements and Documentation

Subject Structure

Based on measurements taken while on site, each of the rooms was 252 square feet. Regulatory sampling requirements are based on this value.

A general aerial layout of the commercial setting is depicted in the aerial photograph below. The subject property is outlined in red and the subject room (Room 145) is depicted as a solid red square.



Figure 1
General Site Layout⁵

Review of Law Enforcement Documentation

As part of the PA, FACTs is required by regulation⁶ to review available law enforcement documents pertinent to a subject property. During this project, FACTs contacted two

⁵ Courtesy of USDA Farm Service Agency as accessed through Google™

⁶ 6 CCR 1014-3 (Section 4.2)



regulatory agencies for documentation: 1) Pueblo Police Department and 2) Pueblo County Department of Health:

The Department of Health promptly responded and exhibited the highest degree of professionalism and courtesy, and participated openly and responded promptly to our requests for information. Up to the date of the preparation of this report, FACTs did not receive any communications of any kind or response of any kind from the City of Pueblo Police Department.

Based on our review of available documentation, the occupant of the subject room, was in possession of methamphetamine paraphernalia and methamphetamine, and was otherwise well known to law enforcement. There was no indication that the occupant had the ability to manufacture methamphetamine in the room at the time of his occupancy.

Governing Body

Pursuant to statute and regulations, the documentation in this report must be submitted to the “Governing Body” to avail of the statutory liability immunity. The *de facto* “Governing Body” as defined in CRS 25-18.5-101 for this property is:

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

Visual Inspection of the Property

As part of the Preliminary Assessment, on January 30, 2012, Mr. Caoimhín P. Connell, Forensic Industrial Hygienist with FACTs, performed a visual inspection and sampling of the subject property. During the assessment, the property was in an “unoccupied” condition, and contained normal motel furniture. Mr. Connell was assisted by Ms. Christine Carty, Field Technician.⁷ A copy of Mr. Connell’s statement of qualifications is included as a mandatory appendix with this discussion.

FUNCTIONAL SPACE SUMMARY

During a Preliminary Assessment, the Industrial Hygienist is required by regulation to divide the study area into “functional spaces,” and evaluate the potential for contamination in each area. The idea is to segment a property into specific areas which may present different potentials for contamination, based on the anticipated use or function conducted in that area. Thus, in a larger structure, functions of bedrooms and bathrooms may be different, kitchens and living rooms, may be different, etc. Pursuant to regulations, a building is divided into such areas based solely on subjective professional

⁷ Ms. Carty received a training certificate in Clandestine Drug Lab Safety through the State of Colorado Department of Public Safety, Division of Criminal Justice, Colorado Regional Community Policing Institute (CRCPI) sponsored by the US Dept. of Justice High Intensity Drug Trafficking Area fund.



judgment with foundational guidance in Federal Regulation.⁸ In this case, each individual room became the Functional space. Based on our experience, there is not significant contamination difference between a motel bed chamber and a motel bathroom located within that bed chamber.

A general overview of each space is provided in the following discussion. Indicators are detailed in FACTs form ML5, included in the appendix of this report. For evaluation purposes, the following Functional Spaces have been identified and are addressed below:

Functional Space	Describe the functional space
1	Room 144 and associated bathroom
2	Room 145 and associated bathroom
3	Room 146 and associated bathroom
4	Room 254 and associated bathroom
NA	Exterior Grounds

Table 2
Functional Space Inventory

This property did not have an attic, and the plenum above each room was passive containing a 100% recirculating heat pump.

There was no designed common ventilation between the rooms; any and all potential migration would occur by passive infiltration only.

Functional Space 1: Room 144

Located to the east of the Subject Room, this room did not contain any visual indicators. This functional space was subsequently cleared with a discreet sample (PM013012-05) which indicated a methamphetamine concentration of 0.35 µg/100cm². Therefore, this room has been removed from the need for remediation and can be used immediately without further restriction.

Functional Space 2: Room 145

The subject room where the methamphetamine was found did not contain any visual clues of production or additional contamination. We did not observe any indicators of Red-p, Nazi, P-2-P, or One-pot production. We anticipate that methamphetamine was the only contaminant.

Two samples were collected from this room, PM013012-01 and PM013012-07 (from the Bathroom and Bed chamber respectively), which indicated a methamphetamine contamination concentration of 1.2 µg/100cm² and 0.72 µg/100cm² respectively. This room and all contents are considered noncompliant and must be cleaned pursuant to Board Rules.

⁸ Asbestos Containing Materials in Schools; Final Rule and Notice, Title 40 CFR Part 763, Fed. Reg. Vol. 52, No. 210, Fri. Oct. 30, 1987



Functional Space 3: Room 146

Located to the west of the Subject Room, this room did not contain any visual indicators. Therefore we attempted to clear this room and exclude it from remediation. Sample PM013012-04 was collected from this room which indicated a methamphetamine contamination concentration of 1.3 µg/100cm². This room and all contents are considered noncompliant and must be cleaned pursuant to Board Rules.

Functional Space 4: Room 254

Located directly above the Subject Room, this room did not contain any visual indicators. This functional space was subsequently cleared with a discreet sample (PM013012-06) which indicated a methamphetamine concentration of 0.06 µg/100cm². Therefore, this room has been removed from the need for remediation and can be used immediately without further restriction.

Furnace and Ventilation

The heating and cooling system is a self-contained 100% recirculating system located in the plenum above the room. The system draws air into the heating and cooling deck, and immediately returns the tempered air as supply. Based on our best attempts to evaluate the system, the air does not mix and is not distributed to any other location or room.

EXTERIOR GROUNDS

Although not truly a functional space *per se*, the exterior grounds were assessed independently. At the time of our visit, the grounds were in their winter vegetative state. Nevertheless, the structure is primarily surrounded by paving materials, and there is no place to discreetly dispose of waste materials without detection.

We did not observe any indication of illegal dumping in the surrounding exterior grounds.

SEWERAGE SYSTEM

The sewer system is “city sewer.” Based on our visual assessment and based on our on-site direct readings of acid gases, phosphine and organic vapors, we did not observe any indications of disposal of illegal materials or wastes into the domestic sewer.

SAMPLE COLLECTION

Wipe Samples

The samples collected during the Preliminary Assessment comprised of “discreet” samples. Discreet samples are a single wipe, collected from a single area, and submitted for analysis as a unique location.

Discreet samples were collected for regulatory compliance purposes and represented structural features.



Each sample location was identified by the Industrial Hygienist based on authoritative bias sampling theory. In this theory, consistent with State regulation, samples are purposely collected from those areas which have the highest probability of containing the highest concentrations of methamphetamine.

Methamphetamine Analysis

Wipe samples were collected in a manner consistent with State regulations. The wipe sample medium was individually wrapped commercially available Johnson and Johnson™ brand gauze pads. Each gauze material was assigned a lot number for quality assurance and quality control (QA/QC) purposes and recorded on a log of results. Each pad was moistened with reagent grade methyl alcohol. Each batch of alcohol was assigned a lot number for QA/QC purposes and recorded on a log of results. Each proposed sample area was delineated with a measured outline. The ruler used to measure each the surface area was decontaminated with a single-use disposable alcohol wipe between samples where the ruler contacted the surface.

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. The wipe samples were submitted for analysis to Reservoirs Environmental Laboratories in Denver, CO for analysis by GCMS.

QA/QC Precautions

The sampling media were prepared in small batches in a clean environment (FACTs Corporate Offices). The sample media were inserted into individually identified disposable plastic centrifuge tubes with caps.

Field Blanks

For QA/QC purposes, and in accordance with State requirements, one field blank was submitted for every ten wipe samples. The field blank (PM013012-03) was randomly selected from the sampling sequence and included with the samples. To ensure the integrity of the blanks, FACTs personnel were unaware, until the actual time of sampling, which specific sample would be selected as a blank. Similarly, to ensure the integrity of the blank, laboratory personnel were unaware of the presence of a blank in the sample suite.

Field Spikes

As part of our general QA/QC protocol, FACTs regularly submits surreptitious spikes to the analyzing laboratory. "Spiked" samples consist of randomly selecting samples 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 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 are then corrected to the spike



recovery. In this case, there was a single spike submitted (PM013012-02) that contained 4 µg of d-methamphetamine. The laboratory reported recovering 90% of the spike amount, which is within tolerance for environmental samples, and therefore the spike has confirmed the laboratory can confidently quantify the mass of methamphetamine in the unknown samples.

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 entry into the subject room, each member of FACTs donned a disposable Tyvek suit. Prior to entering each of the ancillary rooms FACTs personnel donned disposable booties.

The ladder used during our assessment had been decontaminated at a car wash prior to being brought on site.

Collection Rationale

Primary Objective

It is a common misconception that the Industrial Hygienist is required to collect samples during a PA. However, no such requirement exists in Colorado. Rather, regarding samples, the regulations state:

Pre-decontamination sampling

In pre-decontamination sampling, the question that is being asked is “Is there evidence of the presence of methamphetamine production in this area?” The assumption (hypothesis) is that the area is clean i.e. “compliant,” and data will be collected to find support for the hypothesis. Data (such as samples) are collected to “prove” the area is compliant. Sampling, if it is performed, is conducted in the areas potentially containing the highest possible concentrations of contaminants. Any data that disproves the hypothesis, including police records, visual clues of production, storage, or use or documentation of drug paraphernalia being present, is considered conclusive, and leads the consultant to accept the null hypothesis and declare the area non-compliant. The strength of evidence needed to reject the hypothesis is low, and is only that which would lead a reasonable person, trained in aspects of methamphetamine laboratories, to conclude the presence of methamphetamine, its precursors as related to processing, or waste products.

Similarly, there is a misconception that if samples are collected, and the laboratory results are below the value often misinterpreted as the State’s regulatory threshold value (0.5 µg/100 cm²), the samples necessarily indicate that the area is not contaminated and no action is required. However, the regulatory threshold values are exclusively to be used as *prima facie* evidence during final verification activities in the absence of all other information. Except, during a final verification or a properly designed Preliminary Assessment, there is no *de minimis* concentration of methamphetamine below which a statement of compliance can be made in the absence of final verification sampling. Although State regulation does not require samples to be collected during a Preliminary Assessment, as part of this Preliminary Assessment, samples were collected.



To objectively test the *a priori* assumption that some areas may in fact be compliant, FACTs collected a sample from all other functional spaces which would best represent the worst case scenario in those spaces, as required by regulation. These samples, along with their blanks and spikes were submitted for analysis. Based on these samples, we were able to exclude all of the adjoining rooms except Room 146 which, along with Room 145, will need to be remediated.

Sample Results

Methamphetamine

The results of the methamphetamine samples are summarized in the table below.

Sample ID	Sample Location	Area	Result	Criterion	Status
PM013012-01	Room 145 top of light fixture in bathroom	500	1.18	0.50	FAIL
PM013012-02	4 µg Spike	100	4.00	0.50	PASS
PM013012-03	Blank	100	0.05	0.50	PASS
PM013012-04	Room 146 top of light fixture in bathroom	500	1.27	0.50	FAIL
PM013012-05	Room 144 top of light fixture in bathroom	500	0.35	0.50	PASS
PM013012-06	Room 254 top of light fixture in bathroom	138	0.06	0.50	PASS
PM013012-07	Room 145 top of light fixture over beds	613	0.72	0.50	FAIL

Area is expressed in square centimeters

Result and Criterion are expressed as µg/100cm² (Field blanks are reported as absolute mass in µg)

The symbol "<" indicates that methamphetamine was not detected at the detection limit expressed.

BRL indicates the analyte was not detected in the sample.

Table 3
Results of Methamphetamine Wipe Samples

Wipe Sample Results

The samples confirm noncompliant concentrations of methamphetamine in Room 145 and Room 146.

Quality Assurance/Quality Control

The following section is required by regulation and is not intended to be understood by the casual reader.

PA Data Set

MDL was not specified by the laboratory; LOQ was 0.05 µg; MBX <LOQ; LCS mass was not provided by the laboratory reported a 115% recovery; Matrix spike mass was not reported but the laboratory reported 114% with a matrix spike Dup RPD of 3. No surrogate spikes reported. FACTs reagents: MeOH lot #A11Ø1 <MDL for n=28, >MDL for n=0; Gauze lot G1ØØ6 <MDL for n=42, >MDL for n=0. The QA/QC indicate a no bias.



Sample Locations

Consistent with State Regulations and good sampling theory, the location of the samples was based on professional judgment. In this case, it was FACTs' Industrial Hygienist's professional judgment that authoritative biased sampling would be appropriate.

As such, during this project, the Industrial Hygienist selected those areas which had the highest probability of exhibiting the highest concentrations of contamination. Based on our experience, state of the art information on indoor methamphetamine migration patterns and professional judgment, FACTs selected specific locations throughout the rooms in an attempt to represent the highest possible concentrations of methamphetamine. Each sample area was then delineated with a measured outline.

In the figures that follow, the sample locations have been presented. The drawings are stylized and not to scale. In the diagrams, the sample locations are indicated by triangles.

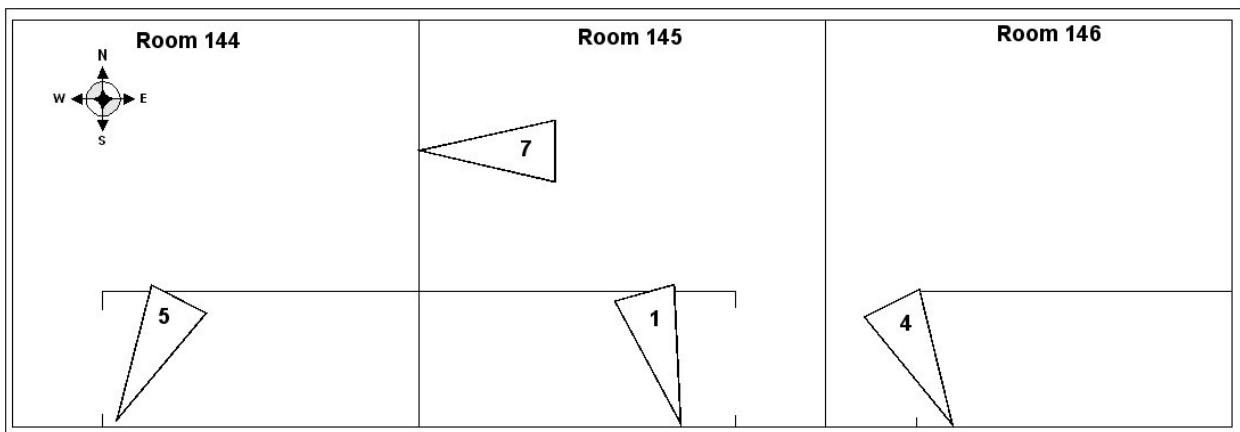


Figure 2
Ground Floor Sample Locations



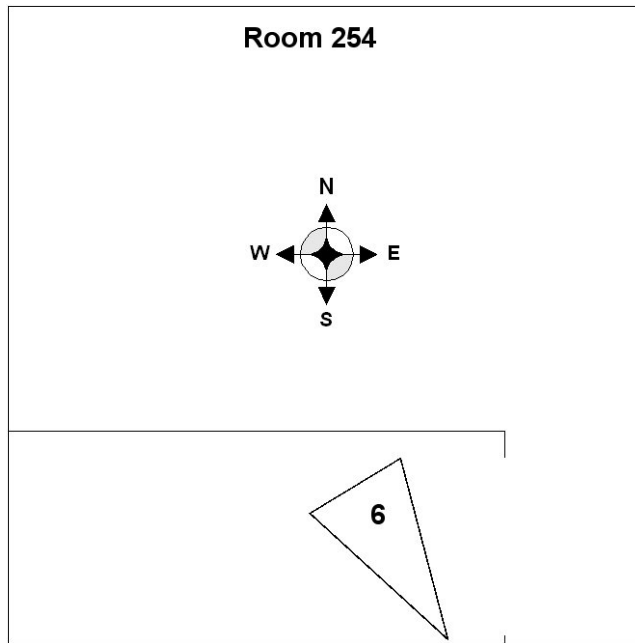


Figure 3
Room 254 Sample Location

Identification of Cook/Storage Areas

Colorado Regulations 6 CCR 1014-3 (4.2) states that the Industrial Hygienist is required to perform a:

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

In this case, based on the best information available and based on visual indicators, we were confident that no manufacturing occurred. Our best assessment at this point is that the widespread contamination is the result of methamphetamine being smoked and stored in Room 145. Although it is possible to determine if manufacturing occurred, the question of whether or not methamphetamine was actually manufactured is not of regulatory significance.

Methamphetamine is currently being stored at the property in Room 145 and Room 146 on all surfaces in the noncompliant functional spaces.

Identification of Contamination Migration

FACTs has knowledge that methamphetamine was stored on the property. However, for this project, FACTs must rely exclusively on subjective extant observations we make on site. Based on the best information readily available, FACTs was not able to find any indicators that would suggest contamination migration.



CONCLUSIONS

Based on the totality of the circumstances, including our subjective observations and objective data from sampling, we find that there is insufficient evidence to support the preliminary hypothesis and we accept the null hypothesis and conclude that methamphetamine contamination exists in specific locations within the subject property.

Based on our observations, all surfaces in Room 145 and Room 146, including contents and the furnace system and associated duct work, must be cleaned pursuant to 6 CCR 1014-3.

Universal Site Requirements

Based on our observations, and laboratory results, we recommend standard industry practices for decontamination be followed. The remediation contractor should be given full responsibility for their own standard operating procedures. The following are provided as guidance and reflect standard practices for the remediation of similar properties. The Governing Body has statutory authority to require a greater degree of decontamination of the subject property.

1. To ensure guests are not alarmed and to allow sufficient room for the decontamination contractor, a section of parking lot should be roped off to allow staging of equipment. A shower and decontamination air-lock should be constructed at the entrance to the front door of Room 145 and Room 146. The entrance of the plastic air lock should bear a sign stating:

UNDER CONSTRUCTION – Excuse Our Dust!
No Entry
Authorized Construction Personnel Only

2. Decontamination personnel should conduct all suiting, donning and doffing of respirators, and other transloading activities within the privacy of the isolated air lock.
3. During cleaning activities, negative pressure shall be established in each room by the installation of a suitable negative pressure machine. Active cleaning should not take place except during the operational hours of the negative air machine.
4. The negative air machines should only operate from 9 a.m. until 10 p.m. each day.
5. Outside of the operational hours, the bathroom vents shall be sealed with a poly critical barrier.
6. Exhaust from the negative air machine should be to an outside window.



7. After cleaning activities are completed in each room, the bathroom exhaust vents shall be sealed with a critical barrier and the negative air machine can be removed, and the entrance door to each room sealed with a critical barrier.
8. Once entry is made in a room, the cleaning personnel should immediately clean and cover the exterior windows with opaque plastic to the windows to prevent guests from observing activities in the room.
9. A secure on-site storage container should be established on the grounds (such as a poly lined and covered roll on—roll off container or temporary trailer).
10. The on-site container shall be secured with a padlock at all times when not immediately manned by remediation personnel.
11. Mattresses and furniture that are slated for disposal shall be damaged in such a manner as to prevent future use – mattresses shall be sliced open on both sides and otherwise damaged prior to being discarded.
12. A licensed contractor, who is trained and experienced in methlab decontamination, as required by State regulations, should be contracted for the decontamination work. All work performed at the subject property should be conducted by an experienced contractor whose employees are documented to have been properly trained in accordance with 29 CFR §1910.120 and Colorado Revised Statute §25-18.5-104; *Entry into illegal drug laboratories*.
13. We recommend the decontamination process be conducted in a minimum of Level C PPE ensembles with a minimum of half-face APRs or PAPRs.
14. All work performed at the subject property should be conducted with open communication and cooperation with the Pueblo County Department of Health and the City of Pueblo Police Department.
15. Any evidence of child pornography shall be immediately reported to the City of Pueblo Police Department.
16. Discovery of any controlled substances shall be immediately reported to the City of Pueblo Police Department.
17. Once negative pressure has been established, carefully bag and remove all clothing, debris and other personal items from the affected room.
18. Microwave ovens, refrigerators, flat screen TVs, telephones and all other hard surfaced appliances can be economically salvaged by thoroughly wiping down the surfaces.
19. Any salvaged items can remain in the room for final clearance testing.



20. Window coverings (window blinds) should be discarded.
21. Window draperies can be laundered in a controlled off site laundry designed for the decontamination of hazardous materials, if one is available. Otherwise, the draperies will need to be discarded.
22. Once all items are bagged and/or wrapped, the items can be transported through the airlock and transloaded to the bag-out. At the bag-out, the exterior surfaces of the bags and wrapping should be wiped down, and the bags and items may be discarded.
23. All bathroom exhaust vents shall be removed and wiped.
24. The carpeting can be adequately decontaminated and the contractor is encouraged to provide a proposal for steam-cleaning the carpet, and allowing the carpet to remain. If the carpet remains, it will be subjected to final clearance sampling in accordance with standard industrial hygiene microvacuum sampling procedures.⁹ Otherwise, the carpeting and associated padding should be removed and discarded.
25. Following the removal of interior contents, all surfaces in the entire interior space including all ceilings, all hanging fixtures, all cabinets (interior and exterior surfaces), all shelving, all floors, doors, hinges, bathtubs, sinks, appliances (interior and exterior surfaces), and every other interior surface whether specifically mentioned or not, shall be thoroughly wiped down to remove residual contamination.
26. Contractors should be contractually obligated to cover industrial hygiene costs of return visits and sample expenses as a result of a failed final clearance.
27. Following the decontamination process, and prior to the final clearance sampling by the Industrial Hygienist, the remediation contractor/subcontractor should be contractually obligated to collect a minimum of one QA/QC wipe sample from each room as part of their own QA program, and submit those samples for methamphetamine analysis. The contractor should be contractually obligated to provide their wipe sampling data (including location of sample, area of sample, and analysis results), to the consulting Industrial Hygienist for review prior to final clearance sampling.
28. If the contractor's QA/QC samples suggest that contamination in the subject property remains at a concentration in excess of $0.25 \mu\text{g}/100 \text{ cm}^2$, the contractor

⁹ For example, see ASTM Method D 5756-02



- should be contractually obligated to continue to clean, and sample, until the elevated concentrations are not observed.
29. Once the contractor's samples indicate the contamination has been sufficiently reduced, FACTs will return to the site and perform the State mandated post remediation verification.
 30. State regulations prohibit painting or otherwise encapsulating surfaces prior to final clearance sampling by the Industrial Hygienist.
 31. State regulations prohibit the use of strong oxidizers to mask the presence of methamphetamine; no cleaning agents containing greater than 5% hydrogen peroxide (or other oxidizer) are permitted on site.

-*END*-

Enclosures: One CD; Data package, and Appendices



APPENDIX A:

SUPPORTING DOCUMENTS





**FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.
CLANDESTINE METHAMPHETAMINE LABORATORY
ASSESSMENT FIELD FORMS[©]**

FACTs project name: Hotel 6	Form # ML1
Date: January 30, 2012	
Reporting IH:	Caoimhin P. Connell, Forensic IH

PROPERTY DESCRIPTION:

Physical address	Motel 6 4103 North Elizabeth St. Pueblo CO 81008-2009		
Legal description or VIN	Lot 6, College Road Shopping Center Sub, 3rd Filing; Schedule: 73313 Neighborhood: 0 Analysis Area: 0; Tax District: 60BP		
Registered Property Owner	COMPASS GROUP PO BOX 260888 PLANO TX 75026-0888		
Number of structures	One		
Type of Structures (Each affected structure will need a "Functional Space" inventory)	Room 144	252	Square feet
	Room 145	252	Square feet
	Room 146	252	Square feet
	Room 254	252	Square feet
Adjacent and/ or surrounding properties	North: Light medical services building		
	South: Commercial hotel		
	East: Interstate highway and frontage road		
	West: Undeveloped lot		
General Property Observations	Well maintained commercial hotel property		
Presumed Production Method	Storage, distribution and smoking		

Year Built: 1981, Total Building Area: 31,407 ft². Building Perimeter: 926, affected area total of 1,008 square feet.

PLUMBING INSPECTION AND INVENTORY

FACTs project name: Hotel 6	Form # ML2
Date: January 30, 2012	
Reporting IH:	Caoimhin P. Connell, Forensic IH

Functional Space	Room	Fixture	Indicia?	Comments
1	Bathroom # 1	Bath	N	
1	Bathroom # 1	Shower	N	
1	Bathroom # 1	Sink 1	N	
1	Bathroom # 1	Toilet	N	
2	Bathroom # 2	Bath	N	
2	Bathroom # 2	Shower	N	
2	Bathroom # 2	Sink 1	N	
2	Bathroom # 2	Toilet	N	
3	Bathroom # 3	Bath	N	
3	Bathroom # 3	Shower	N	
3	Bathroom # 3	Sink 1	N	
3	Bathroom # 3	Toilet	N	
4	Bathroom # 4	Bath	N	
4	Bathroom # 4	Shower	N	
4	Bathroom # 4	Sink 1	N	
4	Bathroom # 4	Bath	N	

THIS SECTION IS INTENTIONALLY BLANK

VENTILATION INSPECTION AND INVENTORY

Item	Y/N	Indicia ?	Sampled ?	Comments
Isolated AHU?	Y	N	N	
Common air intake?	N	NA	NA	
Common bathroom exhausts?	N	NA	NA	
Forced air system?	Y	N	N	
Steam heat?	N	NA	NA	
Common ducts to other properties?	N	NA	NA	
Passive plena to other properties?	Y	N	N	Possible passive rout
Active returns to other properties?	N	NA	NA	
Passive wall grilles to other properties?	N	NA	NA	
Industrial ventilation?	Y	N	N	
Residential ventilation?	N	NA	NA	
Pressurized structure?	N	NA	NA	



FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.

FUNCTIONAL SPACE INVENTORY

FACTs project name: Hotel 6	Form # ML3
Date: January 30, 2012	
Reporting IH:	Caoimhin P. Connell, Forensic IH

Structure Number	Functional Space Number	Indicia (Y/N)	Describe the functional space (See drawings for delineating structural features)
1	1	Y	Room 144 and associated bathroom
1	2	Y	Room 145 and associated bathroom
1	3	Y	Room 146 and associated bathroom
1	4	Y	Room 254 and associated bathroom

THIS SECTION INTENTIONALLY LEFT BLANK



LAW ENFORCEMENT DOCUMENTATION

FACTs project name: Hotel 6	Form # ML4
Date: January 30, 2012	
Reporting IH:	Caoimhin P. Connell, Forensic IH

Inventory of Reviewed Documents	No response from Pueblo Police Department
Described method(s) of production	Smoking and storage
Chemicals identified by the LEA as being present	Methamphetamine
Cooking areas identified	None
Chemical storage areas identified	Room 145 and Room 146
LE Observation on areas of contamination or waste disposal	Unknown





FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.

January 26, 2012

Deputy Chief A. M^cLachlan
Pueblo Police Department
200 S. Main St.
Pueblo, CO 81003

Via Fax: (719) 553-2479

Dear Deputy Chief M^cLachlan:

Forensic Applications, Inc. has been contracted to perform a "Preliminary Assessment" at an identified illegal drug laboratory pursuant to Colorado Board Of Health Regulations 6-CCR-1014-3, and CRS §25-18.5-101 *et seq.* The property is located in the City of Pueblo at:

Motel 6, (Room 145), 4103 N Elizabeth Street

As you are aware, as part of that assessment, the Industrial Hygienist is required by regulation 6-CCR-1014-3 (§4.2) to review available Law Enforcement documents associated with the property. Generally, we initially do not require copies of any documents; and, if preferable, we can visit your records offices and review available information there.

We would like to review any narratives or call histories regarding controlled substances or hazardous materials responses, or speak with any Law Enforcement personnel who may be familiar with the incident at the property. We are only interested in issues involving controlled substances or hazardous materials responses on the day of the most recent arrest that took place involving methamphetamine. If no such records are available please let us know and we will merely make that notation in our report to the Pueblo County Department of Health.

We will be performing the on-site assessment on January 30 or 31, 2012, and we will need to review documents before then. We apologize for the short notice, however, we generally do not have any control over the timeframes involved. FACTs would be happy to contact your office prior to our site visit and invite your investigators to observe our activities. We will naturally immediately make your office aware of any additional evidence of criminal activity we encounter.

Forensic Applications takes extreme caution to protect all Law Enforcement Sensitive information. When requested by the Law Enforcement Agency, we do NOT reveal names, document identities, or include any information considered sensitive by an investigating agency. We have developed a very close working relationship with agencies state-wide and we value and respect that open line of communication. Please let me know if you need a copy of our final report(s).

I affirm that upon receipt of requested records of official actions and/or criminal justice records from the Pueblo Police Department, such records shall not be used for the direct solicitation of business for pecuniary gain, pursuant to CRS §24-72-305.5

Sincerely,

Caoimhín P. Connell
Forensic Industrial Hygienist
CC: Chad Wolgram, PCDH

Successful transmission to 17195834524. Re: Corrected request

Thursday, January 26, 2012 3:54 PM

From:

"send@mail.efax.com" <send@mail.efax.com>

[Add sender to Contacts](#)

To:

admin@forensic-applications.com



Dear Caoimhín P. Connell,

Re: Corrected request

The 3 page fax you sent through [eFax.com](http://www.efax.com) to 17195834524 was successfully transmitted at 2012-01-26 22:54:12 (GMT).

The length of transmission was 137 seconds.

The receiving machine's fax ID: .

Best Regards,

If you need additional assistance, please visit our online help center at <http://www.efax.com/help/>. Thank you for using the eFax service.

eFax.com

Customer Service

Online Help: <http://www.efax.com/help/>

Tel: 323-817-3205 (US) or 0870 711 2211 (UK)

Email: help@mail.efax.com

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FIELD OBSERVATIONS

FACTs project name: Hotel 6	Form # ML5
Date: January 30, 2012	
Reporting IH:	Caoimhin P. Connell, Forensic IH

Structure:

Indicator	Functional Space	Indicator	Functional Space
Acids	No comment	Match components	No comment
Aerosol cans	No comment	Mercury	No comment
Alcohols (MeOH, EtOH)	No comment	Methamphetamine	1,2,3,4
Ammonia	No comment	Modified coolers/containers	No comment
Ammunition	2	Modified electrical	No comment
Artistic expressions	No comment	Modified plumbing	No comment
Bags of salt	No comment	Modified structure	No comment
Bases	No comment	Modified ventilation	No comment
Basters/Pipettes	No comment	Needles/Syringes	No comment
Batteries	No comment	OTC Containers	No comment
Bi-phasic wastes	No comment	OTC drugs	No comment
Booby traps	No comment	pH papers/indicators	No comment
Bullet holes	No comment	Phenyl-2-propanone	No comment
Burn marks	No comment	Pornography, Sex toys	No comment
Cat litter	No comment	Prescription drugs	No comment
Chemical storage	No comment	Presence of cats	No comment
Colored wastes	No comment	Propane bottles	No comment
Corrosion on surfaces	No comment	Pseudoephedrine	No comment
Death bag	No comment	Red P	No comment
Delaminating paint	No comment	Red Staining	No comment
Drug paraphernalia	No comment	Reserved	No comment
Empty OTC Containers	No comment	Salters	No comment
Ephedrine	No comment	Security devices	No comment
Feces	No comment	Signs of violence	No comment
Filters	No comment	Smoke detectors disabled	No comment
Forced entry marks	No comment	Solvents - (organic)	No comment
Funnels	No comment	Squalor	No comment
Gang markings	No comment	Staining on floors	No comment
Gas cylinders	No comment	Staining on walls or ceiling	No comment
Gerry cans	No comment	Stash holes	No comment
Glassware	2	Taping on surfaces	No comment
Graffiti	No comment	Tubing	No comment
Heating mantle/hot plate	No comment	Urine containers	No comment
Hidden items	No comment	Wall anchors	No comment
Hydrogen peroxide	No comment	Wall coverings	No comment
Iodine	No comment	Wall damage	No comment
Lead	No comment	Weapons	2
Lithium	No comment	Window block material	No comment
Marijuana	2	Yellow staining	No comment

- ① Present but not as indicia
- ② Copious or unusual quantities
- ③ Present in normal household expectations
- ④ Modified in manner consistent with clanlab use



INDIVIDUAL SEWAGE DISPOSAL SYSTEM FIELD FORM

FACTs project name: Hotel 6	Form # ML7
Date: January 30, 2012	
Reporting IH:	Caoimhín P. Connell, Forensic IH

	Yes	No	N/C
Does the property have an ISDS		X	
Is there unusual staining around internal drains		X	
Are solvent odors present from the internal drains		X	
Is there evidence of wastes being disposed down internal drains		X	
Are solvent odors present from the external sewer drain stacks			X
Was the septic tank lid(s) accessible	City Sewer		
Was the leach field line accessible			
Was the septic tank <u>or</u> leach field lines opened			
Are solvent odors present from the leach field lines (if "yes" see below)			
Are solvent odors present from the septic tank (if "yes" see below)			
Is "slick" present in the septic tank			
Are biphasic (aqueous-organic) layers present in the septic tank			
Was pH measured in the septic tank			
Were organic vapors measured in the septic tank (if "yes" see below)			
Is sampling of the ISDS warranted			
Were calawasi/drum thief samples collected from the septic tank			

*NC = Not checked

Qualitative Organic Vapor Monitoring

Instrument Type	Make and Model
Hydrocarbon detector	EnMet Target Series, MOS detector
pH Strips	Baker Industries

Location	MOS*	PID*	FID*
All internal sinks	<1 ppm	NA	
All surrounding soils (see body of report for explanation)			

*Units of measurement are in parts per million equivalents compared to the toluene calibration vapor. Detection limit 1 ppm

Locator Notes:



PRE-REMEDIATION PHOTOGRAPH LOG SHEET

FACTs project name: Hotel 6		Form # ML8
Date: January 30, 2012		
Reporting IH:	Caoimhin P. Connell, Forensic IH	



Name ▲	Date Picture Taken	Name ▲	Date Picture Taken	Name ▲	Date Picture Taken
Exterior	12/30/2011 1:08 PM	Room 145 (16)	12/30/2011 12:34 PM	Room 146 (7)	12/30/2011 1:00 PM
Exterior (2)	12/30/2011 1:11 PM	Room 145 (17)	12/30/2011 12:34 PM	Room 146 (8)	12/30/2011 1:00 PM
Exterior (3)	12/30/2011 1:11 PM	Room 145 (18)	12/30/2011 12:35 PM	Room 146 (9)	12/30/2011 1:00 PM
Exterior (4)	12/30/2011 1:11 PM	Room 145 (19)	12/30/2011 12:35 PM	Room 146 (10)	12/30/2011 1:00 PM
Exterior (5)	12/30/2011 1:13 PM	Room 145 (20)	12/30/2011 12:35 PM	Room 146 (11)	12/30/2011 1:00 PM
Exterior (6)	12/30/2011 1:23 PM	Room 145 (21)	12/30/2011 12:35 PM	Room 146 (12)	12/30/2011 1:00 PM
Exterior (7)	12/30/2011 1:23 PM	Room 145 (22)	12/30/2011 12:35 PM	Room 146 (13)	12/30/2011 1:01 PM
Exterior (8)	12/30/2011 1:23 PM	Room 145 (23)	12/30/2011 12:37 PM	Room 146 (14)	12/30/2011 1:01 PM
Exterior (9)	12/30/2011 1:24 PM	Room 145 (24)	12/30/2011 12:37 PM	Room 146 (15)	12/30/2011 1:01 PM
Room 144	12/30/2011 1:04 PM	Room 145 (25)	12/30/2011 12:38 PM	Room 146 (16)	12/30/2011 1:01 PM
Room 144 (2)	12/30/2011 1:04 PM	Room 145 (26)	12/30/2011 12:39 PM	Room 254	12/30/2011 1:16 PM
Room 144 (3)	12/30/2011 1:05 PM	Room 145 (27)	12/30/2011 12:39 PM	Room 254 (2)	12/30/2011 1:16 PM
Room 144 (4)	12/30/2011 1:05 PM	Room 145 (28)	12/30/2011 12:40 PM	Room 254 (4)	12/30/2011 1:15 PM
Room 144 (5)	12/30/2011 1:05 PM	Room 145 (29)	12/30/2011 12:40 PM	Room 254 (5)	12/30/2011 1:15 PM
Room 144 (6)	12/30/2011 1:05 PM	Room 145 (30)	12/30/2011 12:40 PM	Room 254 (6)	12/30/2011 1:15 PM
Room 144 (7)	12/30/2011 1:05 PM	Room 145 (31)	12/30/2011 12:47 PM	Room 254 (7)	12/30/2011 1:15 PM
Room 144 (8)	12/30/2011 1:06 PM	Room 145 (32)	12/30/2011 12:48 PM	Room 254 (8)	12/30/2011 1:13 PM
Room 144 (9)	12/30/2011 1:05 PM	Room 145 (33)	12/30/2011 12:48 PM	Room 254 (9)	12/30/2011 1:13 PM
Room 144 (10)	12/30/2011 1:06 PM	Room 145 (34)	12/30/2011 12:50 PM	Room 254 (10)	12/30/2011 1:13 PM
Room 144 (11)	12/30/2011 1:06 PM	Room 145 (35)	12/30/2011 12:50 PM	Room 254 (11)	12/30/2011 1:13 PM
Room 144 (12)	12/30/2011 1:06 PM	Room 145 (36)	12/30/2011 12:50 PM	Room 254 (12)	12/30/2011 1:13 PM
Room 144 (13)	12/30/2011 1:06 PM	Room 145 (37)	12/30/2011 12:50 PM	Room 254 (13)	12/30/2011 1:13 PM
Room 144 (14)	12/30/2011 1:06 PM	Room 145 (38)	12/30/2011 12:50 PM	Room 254 (14)	12/30/2011 1:13 PM
Room 144 (15)	12/30/2011 1:06 PM	Room 145 (39)	12/30/2011 12:51 PM	Room 254 (15)	12/30/2011 1:14 PM
Room 144 (16)	12/30/2011 1:07 PM	Room 145 (40)	12/30/2011 12:51 PM	Room 254 (16)	12/30/2011 1:14 PM
Room 145	12/30/2011 12:31 PM	Room 145 (41)	12/30/2011 12:51 PM	Room 254 (17)	12/30/2011 1:14 PM
Room 145 (2)	12/30/2011 12:34 PM	Room 145 (42)	12/30/2011 12:51 PM	Room 254 (18)	12/30/2011 1:14 PM
Room 145 (3)	12/30/2011 12:34 PM	Room 145 (43)	12/30/2011 12:51 PM	Room 254 (19)	12/30/2011 1:15 PM
Room 145 (4)	12/30/2011 12:34 PM	Room 145 (44)	12/30/2011 12:51 PM		
Room 145 (5)	12/30/2011 12:34 PM	Room 146	12/30/2011 12:59 PM		
Room 145 (6)	12/30/2011 12:34 PM	Room 146 (2)	12/30/2011 12:59 PM		
Room 145 (7)	12/30/2011 12:34 PM	Room 146 (3)	12/30/2011 1:00 PM		
Room 145 (8)	12/30/2011 12:34 PM	Room 146 (4)	12/30/2011 1:00 PM		
Room 145 (14)	12/30/2011 12:34 PM	Room 146 (5)	12/30/2011 1:00 PM		
Room 145 (15)	12/30/2011 12:34 PM	Room 146 (6)	12/30/2011 1:00 PM		



CERTIFICATION, VARIATIONS AND SIGNATURE SHEET

FACTs project name: Hotel 6	Form # ML14
Date: February 7, 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.	XXXXXXXXXXXXXXXX
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.

No known deviation of standard occurred.

MANDATORY LANGUAGE PURSUANT TO 6 CCR 1014-3 (§8.23 AND §8.24)

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: February 7, 2012





**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 B

ANALYTICAL REPORTS FOR FACTS SAMPLES

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.

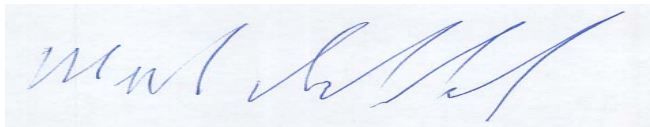
Reservoirs has analyzed the following sample(s) using Gas Chromatography Mass Spectrometry (GC/MS) / Gas Chromatography Flame Ionization Detector (GC/FID) per your request. The analysis has been completed in general accordance with the appropriate methodology as stated in the analysis table. Results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

APPENDIX C

COMPACT DIGITAL DISK (PHOTOGRAPHS AND ADDITIONAL DOCUMENTATION)

