



FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.

October 26, 2007

Georgina Miller
16275 Mt. Vernon Road
Golden, CO 80401

Dear Ms. Miller:

Thank you for permitting Forensic Applications Consulting Technologies Inc. (FACTs) the opportunity to provide you with industrial hygiene services.

At your request, we briefly reviewed the Quest Environmental document titled: "*Miller Residence at 16275 Mt. Vernon Road in Golden, CO 80401, Suspected Clandestine Methamphetamine ("Meth") Lab, Preliminary Assessment Inspection, Sampling and Recommended Scope of Work*" and dated September 21, 2007.

Based on our cursory review, we have found the document is fatally flawed and grossly deficient in its content. Our review has indicated that it does not meet the basic regulatory requirements constituting a "Preliminary Assessment" as that term is defined in State regulations, and the document is not tenable as a "Preliminary Assessment."

Furthermore, the document was prepared by an individual who, based on the best information available, is not authorized to perform a "Preliminary Assessment" in the State of Colorado pursuant to pertinent State regulations.

Although we did not perform a full critical review of the document, we found many fatally flawed problems with the document and we have addressed some of those elements here.

Regulatory Framework

The State of Colorado currently has three methamphetamine *statutes* and one methamphetamine *regulation* that are germane to this particular property. Colorado has one of the country's most comprehensive and scientifically based clandestine drug laboratory regulations. The Colorado regulations are titled "Colorado Department Of Public Health And Environment, State Board Of Health, *Regulations Pertaining to the Cleanup of Methamphetamine Laboratories*" and are codified as 6 CCR 1014-3.

These regulations become applicable when the 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**,¹ and the owner of the property where the "drug laboratory" is located has received notice.

¹ CRS §25-18.5-103

In turn, something that apparently is not understood by Quest Environmental, “drug laboratory” is defined in Colorado Revised Statutes §25-18.5-101 as the areas where controlled substances have been manufactured, processed, cooked, disposed of, *or stored* and all proximate areas that are likely to be contaminated as a result of such manufacturing, processing, cooking, disposing, or *storing*. The definitions of an illegal drug lab includes mere presence in the context of illegal possession and constitutes *storage* and therefore, an “illegal drug lab” as defined by State statutes.

Pursuant to State statute CRS §25-18.5-105(1), an illegal drug laboratory that has not met the cleanup standards set by the Colorado State Board of Health must be deemed a public health nuisance.

Therefore, based on the information you provided to us over the telephone, “Discovery” and “Notification” would have occurred when law enforcement personnel identified the presence of any indicators of the possession or presence of methamphetamine at the property, and the property owner, at that that point, would have been required to follow the mandatory statutes and regulations. We have addressed the property owner’s statutory obligations to you (the buyer) upon selling the house later in this letter.

Authorized Consultants

One of the regulatory requirements facing a property owner following discovery is a “Preliminary Assessment” which must be performed for the property (6 CCR 1014-3 §4). Explicitly pursuant to 6 CCR 1014-3 §3, the Preliminary Assessment can only be performed by an Industrial Hygienist. In Colorado, the term “Industrial Hygienist” is defined by State Statute (CRS §24-30-1402) and only those individuals who meet the requirements found therein may call themselves an “Industrial Hygienist,” present themselves as an “Industrial Hygienist” and practice Industrial Hygiene in Colorado.

To our knowledge, neither of the personnel identified in the Quest report are Industrial Hygienists. Furthermore, implicit in the State regulations is that the Industrial Hygienist has been “...trained in aspects of methamphetamine laboratories...” (Mandatory Attachment to Appendix A of the regulation.) According to the regulations, the Industrial Hygienist performing the Preliminary Assessment is required to provide, as part of the documentation:

§8.21. Consultant statement of qualifications, including professional certification or qualification as an industrial hygienist as defined in section 24-30-1402, C.R.S., and description of experience in assessing contamination associated with methamphetamine labs.

Nowhere in the document you provided to us, do we see where this important requirement has been met by Quest. In fact, it is our understanding that neither Mr. Robert A. Woellner, nor his assistant Leah Ledenbach are Industrial Hygienists, and therefore, neither are authorized to perform the Preliminary Assessment pursuant to state regulations. Furthermore, their own documentation is not signed as “Industrial Hygienist” but rather as “Senior Scientist” (a non-defined term that can be used by any person in this state



regardless of their lack of academic credentials – essentially a ten year old child could sign their reports, “Senior Scientist”).

Indeed, pursuant to State statute CRS §25-18.5-104, entry by Quest personnel into the property may have been illegal.

An example of the required statement of qualifications (SOQ) is provided with this letter, wherein we have provided a copy of our standard methlab SOQ. In our case, in addition to our primary Industrial Hygienist, each of our field technicians hold a certificate of training from the Colorado Department of Public Safety, Colorado Regional Community Policing Institute in methlab entry and emergency response, and other technicians are POST certified in Colorado with additional U.S. Drug Enforcement Agency training in clandestine drug lab protocols.

Quest Environmental services exhibits a gross lack of understanding of the regulatory requirements placed on qualified personnel when it states on page 6:

Following the complete cleanup of the contaminated areas, post-cleanup clearance sampling must be conducted by an independent industrial hygienist / air quality expert with meth sampling and cleanup experience.

In fact, nowhere in regulation does the state permit clearance sampling by an individual who is a “air quality expert with meth sampling and cleanup experience.” Instead, the state regulations explicitly define the authorized consultant as:

§3: “Consultant” means a Certified Industrial Hygienist or Industrial Hygienist who is not an employee, agent, representative, partner, joint venture participant, shareholder, parent or subsidiary company of the contractor.

And explicitly defines Industrial Hygienist as:

§3 “Industrial Hygienist” means an industrial hygienist as defined in Section 24-30-1402, C.R.S.

It appears that Quest’s sole credentials are incumbent on the supposition that Quest is listed on a web site of Industrial Hygienists and other kinds of contractors involved in methlab cleanup.

Perhaps it is interesting to note that in Colorado,² a person commits criminal impersonation if he knowingly assumes a false or fictitious capacity, and in such capacity he does any act with intent to unlawfully gain a benefit for himself and that “criminal impersonation” is a class 6 felony. Case law exists³ wherein the false assumption of a professional status for pecuniary gain has been found to be criminal impersonation.

It has been our first hand experience, on another project, where Quest Environmental personnel have represented themselves as “experts” in other areas of Industrial Hygiene wherein their work in those areas has also exhibited a gross lack of technical competency indicating a very poor knowledge of even the most basic Industrial Hygiene tenets. In that particular case, the City Health Department has rejected Quest’s “expertise.” Elsewhere, we have seen Quest completely disregard

² CRS §18-5-113 *Criminal impersonation*

³ *People v. Bauer*, 80 P.3d 896 (Colo. App. 2003)



standard Industrial Hygiene practices in favor of “junk science” including using nonsensical sampling (such as using combustible gas analyzers to determine the presence of indoor mould in buildings.)

Failure to Meet Necessary Elements of a Preliminary Assessment

Property Description

Even if Quest personnel were authorized to perform the Preliminary Assessment, the other elements of the Quest report indicate fatal flaws that render the assessment inadequate.

For example, in Section 4.1 of the State regulation states:

Information collected during the preliminary assessment shall include, but not be limited to, the following:

4.1. Property description including physical address, legal description, number and type of structures present, description of adjacent and/or surrounding properties, and any other observations made.

Quest failed to meet this provision of the regulation, and nowhere is the legal description provided or the description of surrounding properties.

Functional Spaces

The Industrial Hygienist performing a Preliminary Assessment is required by regulation to identify “functional spaces:”

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

Quest failed to identify functional spaces, and failed to identify the indicia associated with those spaces, and failed to identify the significance or application of those functional spaces vis-à-vis contamination and decontamination.

For example, is the crawlspace contaminated? Is the contamination important? Does the crawlspace need to be cleaned? How?

Although Quest has identified various rooms, which, if any, are the “Functional Spaces” as defined by state regulation which speak to the issue of similarly contaminated areas? Indeed, the term “functional space” appears just once in the Quest report (Page 7) wherein Quest makes the cryptic statement:

Any functional spaces not fully sampled during the pre-remediation inspection should be sampled during the post-remediation inspection; and

However, apparently Quest fails to understand that the post-remediation inspection, must be based on the Preliminary Assessment, and sampling must, by regulation, include those functional spaces identified in the Preliminary Assessment. How can an Industrial Hygienist perform the required post-remediation sampling in Functional Spaces that have never been identified in the Preliminary Assessment?



Sewer and Plumbing

The State regulations address plumbing and sewer systems during a Preliminary Assessment:

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

Yet Quest's response on Page 3 of their report to this mandatory requirements was:

A plumbing inspection is outside Quest's scope of work. QUEST recommends that the plumbing system be flushed and inspected by a qualified plumber. We recommend that these potential distribution pathways be sampled at the time of final clearance.

It is difficult to understand how, on the one hand, Quest considers it's scope of work to be a Preliminary Assessment, but on the other hand, the individual elements of a Preliminary Assessment to be outside the scope of work.

Furthermore, the regulations⁴ require that all cleaning, including plumbing, be based upon the findings of the Preliminary Assessment. Yet in their document, Quest seems to think that the assessment should be performed after cleaning and prior to the assessment. The Quest document begs the questions: Which plumbing feature(s) should be cleaned? By whom? How? Why? Finally, the final clearance samples must be based on the Preliminary Assessment- however, if the Preliminary Assessment failed to assess the plumbing, how will the final Industrial Hygienist know what or where to sample?

We do not see where, as required by regulation, Quest assessed the sewer system; is the property on city sewer? Septic? Is the leach field contaminated? If no ISDS was present, what is present?

Photographic Record

State regulations require:

4.14. Photographic documentation of property conditions, including cooking areas, chemical storage areas, waste disposal areas, and areas of obvious contamination.

We see where Quest provided some minimal close-up photographs of sample locations, however, we do not see where Quest met the above requirements. For example, we do not see any photographs of property conditions. In general, during a typical assessment, 40 to 150 photographs of a particular property will be made.

⁴ Section 4 states in part: Information gained during the preliminary assessment shall be the basis for property decontamination and clearance sampling.



Chattels

Qwest has failed to address chattels in the property. Is there furniture in the property? Is it contaminated? How much? Can it be cleaned? How? By whom? Is there clothing in the property? Is it contaminated? How much? Can it be cleaned? How? By whom? Mattresses? Art work? Appliances? None of these issues have been addressed.

Samples

Quest collected a variety of samples for reasons they did not explain since nowhere in regulations are such samples required. Rather, the regulations were written for those practitioners with scientific training, and was based on the evaluation of an hypothesis which states:

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.

Quest performed wipe sampling of carpets. Although not prohibited, a legitimate Industrial Hygienist would certainly not have performed wipe sampling of a carpet; such sampling is not normal or customary and does not reflect standard industry practices.

Contamination Criteria

In it’s report, Quest exhibits a gross lack of understanding of the regulations when it erroneously states:

As detailed in the following data table and the attached laboratory report, six of the ten samples surface samples collected contained meth concentrations in excess of the CDPHE State criteria of 0.5 µg/100 cm².

Quest fails to recognize that the value of 0.5 µg/100cm² is not the “CDPHE State criteria” as stated. The fundamental flaw of this statement cannot be overstressed since it indicates that Quest has completely misunderstood it’s role, and has not performed appropriate hypothesis testing.

A recurring myth in methlab related issues amongst unqualified assessors such as Quest, is that if a consultant performs a cursory investigation or a “Preliminary Assessment” and finds methamphetamine contamination, but that contamination is less than 0.5 micrograms per one hundred square centimeters (µg/100cm²), then the property is “OK,” and not covered by the State regulations.



However, this argument is erroneous and no such provisions are found anywhere in State statutes or State regulation. If a consultant arbitrarily chooses non-mandatory sampling (such as performed at your property) at the beginning of an industrial hygiene evaluation, and those samples result in ANY contamination, even below the value of 0.5 µg/100cm², then the property must be declared a methlab.⁵ This is because the cursory sampling does not meet the data quality objectives upon which the 0.5 µg/100cm² value is based. In any event, the mere value of 0.5 µg/100cm² is not the State of Colorado cleanup level, but rather is the basis of the cleanup level, which is described in the mandatory Appendix A of the State regulations.

Even for “Preliminary Assessments,” the initial declaration of contamination is not exclusively based on testing – the initial declaration is found within the language of the mandatory Attachment to Appendix A of the regulation (Hypothesis Testing) which states that (emphasis below is verbatim from my original language which I wrote as a member of the committee that developed Colorado’s regulations):

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.

Contrary to popular misconception, there is no *de minimis* concentration at the beginning of the process below which a property could be declared “not a meth lab” or “not of regulatory concern” since virtually any concentration of meth present in a sample at the property 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.⁶

The Colorado “clearance level” frequently cited by uninformed members of the public, such as Quest, applies exclusively as *prima facie* evidence of decontamination at the end of a project⁷ and is that attainment threshold generally needed to issue a “decision statement” (final clearance). That Quest fails to understand this concept underscores its lack of technical competence in this area (in addition to the fact that it is not authorized to perform the work in the first place).

⁵ *Ibid.* Appendix A

⁶ *Ibid.*

⁷ Colorado Department Of Public Health And Environment, State Board Of Health, *Regulations Pertaining to the Cleanup of Methamphetamine Laboratories*, 6 CCR 1014-3.



Liability Immunity

As was mentioned during our phone conversation, State statutes⁸ establish liability immunity for a property owner once a property owner has met the clean-up standards and documentation requirements established by 6 CCR 1014-3, from a suit for alleged health-based civil actions brought by any future owner, renter, or other person who occupies such property, or a neighbor of such property, in which the alleged cause of the injury or loss is the existence of the illegal drug laboratory used to manufacture methamphetamine.

However, that immunity is only granted if the regulations have been met, and a legitimate Preliminary Assessment has been performed by a *bona fide* Industrial Hygienist, and the a Decision Statement has been issued by the same.

We have encountered five occasions where counties have received documents from parties who are not qualified to perform the stated work. In each case, although the counties accepted the work from the supposed consultant, upon challenge, the homeowners found themselves to be left “holding the bag.” In one case, I testified as an expert witness for a Governing Body wherein the individual was in fact a *bona fide* Certified Industrial Hygienist with a PhD in Chemistry but who lacked any documented training in methlab related issues. In that case, the consultant’s assessment was rejected by the court since the Industrial Hygienist could not demonstrate technical competency in the necessary area.

We note that Quest’s understanding of the regulatory framework is grossly inadequate. For example, on Page 3 of their report, Quest references “House Bill 05-217;” (there was no such House Bill). Quest is confusing various pieces of legislation and is probably referring to House Bill 04-1182 which became codified in Colorado Revised Statutes under Title 25, Article 18.5. Or Quest is confusing the House with the Senate and is confusing House Bill 04-1182 with *Senate* Bill 05-217 which slightly modified House Bill 04-1182. In any event, Quest is obviously not well versed in the regulatory background that governs this work.

It is important to note that the Governing Body (in this case, Jefferson County Department of Health) has no statutory obligation to vet the credentials of the person performing the assessment. Governing Bodies are only required to receive and file documents that have been submitted. Many people are under the misconception that if the Governing Body (in this case the Jeffco Health Department) has accepted the documentation, the acceptance is an indication the Governing Body has “approved” the work and the documents are legitimate – however, such is not the case. The Governing Body can receive and file documents that are entirely and completely grossly inadequate and which have been performed by unauthorized parties.

Such is the case here; Jefferson County is at liberty to accept and file, without comment, the work from Quest regardless of Quest’s statutory authority to perform the work. Especially since the work can be used by the county to conclusively demonstrate one thing- the presence of methamphetamine at the property, all other issues notwithstanding.

⁸ CRS §25-18.5-103



The new owner of the property (Miller), however, upon review by the trier of fact during a future toxic tort suit, will not receive liability immunity since the work was substandard, did not meet the mandatory elements of a legitimate Preliminary Assessment, and appears to have been performed by parties who were neither qualified, nor met the necessary experience or credentials to perform the work.

Statutory Protections

Pursuant to a Colorado statute not yet addressed, (CRS §38-35.7-103 (3)(a)), the seller of a property shall disclose in writing to the buyer whether the seller knows that the property was previously used as a methamphetamine laboratory. It is our understanding that no such disclosure was made. Therefore, pursuant to CRS §38-35.7-103(3)(b) a seller who fails to disclose the presence of a methamphetamine lab is liable to the buyer for:

- (I) Costs relating to remediation of the property according to the standards established by rules of the state board of health promulgated pursuant to section 25-18.5-102, C.R.S.;
- (II) Costs relating to health-related injuries occurring after the sale to residents of the property caused by methamphetamine production on the property; and
- (III) Reasonable attorney fees for collection of costs from the seller.

Customary Charges

During our telephone conversation, you had asked about customary charges. Under the circumstances, it appears that Quest collected samples merely to increase their invoice unnecessarily since we note that the laboratory Quest used for the analysis charges \$35 per analysis, yet Quest charged the client \$60 per sample – customary practice in the Industrial Hygiene profession is cost plus 15%, which would be \$40.25. Under the circumstances, for evaluation of surfaces addressed, the customary protocol would have been to perform composite sampling thus evaluating many areas, but combining the wipes into composites, greatly reducing the costs.

By collecting unnecessary samples, and charging greater than is customary, Quest could unnecessarily increase its invoice by \$19.75 per sample (or \$197.50 for the ten samples). Ironically, for approximately the same amount of money charged by Quest, a legitimate and useful Preliminary Assessment could have been performed.

On the day you spoke to us, FACTs was performing a final assessment of a methlab in Northern Colorado. To provide you with an idea of what constitutes a real Preliminary Assessment, we have attached to this letter a photocopy of that public domain document. The cost of the Preliminary Assessment was approximately the same as you paid Quest.

Considering the extremely poor quality of work, the failure of the consultant to meet minimum regulatory elements, and the possibility that the consultant is not even qualified to perform the work, we do not find that the fees charged for the work were customary.



Conclusions

The Quest report contains many other erroneous and nonsensical, unsupported and unscientific conclusions and statements that indicate that Quest entirely lacks any specialized knowledge in this area of practice.

- The work does not meet the necessary elements required of a Preliminary Assessment.
- The work failed to include mandatory documentation and information.
- The work was based on a false premise.
- The work was performed by individuals who, contrary to State regulation failed to provide evidence of their authority to perform the work.
- The work was performed by individuals who, based on our best information, do not, and never have met the statutory definition of “Industrial Hygienist” as required by regulation.
- The work was performed by individuals known to FACTs to practice “junk science.”
- The work performed by Quest was performed at a technical level of competence approximating that of a home inspector, and which we refer to as a “cursory evaluation.” The customary cost for a cursory evaluation is seldom greater than \$500.
- The Quest work product contains much information that is erroneous.
- The Quest report contains much that is “boiler plate” not germane to the property.
- The Quest report does not contain sufficient information that would permit a remediation company to properly prepare a decontamination plan.

Naturally, and not discussed here, are the statutes which prohibit entry into the property by any and all unauthorized parties (including the owner/occupant).

Recommendations

Pursuant to state statutes, a Preliminary Assessment must be performed at the property by a legitimate Industrial Hygienist who has received appropriate training in methlab issues.

We recommend that a copy of this letter be forwarded to the Jefferson County Department of Health. We hope this information has been useful.

Sincerely,



Caoimhín P. Connell
Forensic Industrial Hygienist



APPENDIX A

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:		Form # ML15
Date:	, 2007	
Reporting IH:	Caoimhín P. Connell, Forensic IH	

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

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

Mr. Connell is Colorado's only private consulting Industrial Hygienist certified by the Office of National Drug Control Policy High Intensity Drug Trafficking Area Clandestine Drug Lab Safety Program, and P.O.S.T. certified by the Colorado Department of Law (Certification Number B-10670); he is a member of the Colorado Drug Investigators Association, and the American Industrial Hygiene Association.

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

Mr. Connell is also a 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 60 assessments in illegal drug labs.

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