

Industrial Hygiene Assessment
Resulting in the Discovery of an
Illegal Drug Laboratory
at
Room 328
Super 8 Hotel
7240 West Jefferson Avenue,
Lakewood, CO 80235

Prepared for:
Bruce Ramani
Ramada Inn
10 E 120<sup>th</sup> Ave
Northglenn CO 80233

## Prepared by:

### FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.

185 Bounty Hunter's Lane Bailey, CO 80421



August 28, 2010

### **EXECUTIVE SUMMARY**

- On Tuesday, August 24, 2010, state of the art sampling was performed by an authorized Industrial Hygienist at the subject property for the determination of methamphetamine.
- The sample results indicated very high concentrations of methamphetamine. The samples indicated that concentrations in excess of 600 times the lawful limit are probable at the subject property.
- Based on the results of the samples, an illegal drug laboratory, as defined in Colorado Revised Statutes §25-18.5-101 exists at the subject property.
- "Discovery" of an illegal drug laboratory, as that term is found in Colorado Revised Statutes §25-18.5-103 and Regulation 6CCR 1014-3 (3) has now occurred at the subject property.
- By virtue of this letter and documentation "Notification" as that term is used in CRS §25-18.5-103 (1)(a) is hereby made.
- According to CRS §25-18.5-104, entry into the property is strictly prohibited.
  Prohibition on entry extends to property owner(s), cleaning staff, maintenance
  personnel, home inspectors, realtors, and any and all other personnel, except law
  enforcement personnel and personnel meeting the requirements of Title 29 of the
  Code of Federal Regulations, Part 1910.120(e).
- Pursuant to CRS §25-18.5-103, the register owner exclusively has two options: 1) commission an authorized Industrial Hygienist to perform a Preliminary Assessment as described in 6 CCR1014-3 (4.0 *et seq*), or 2) Demolish the property. No timeframe is currently assigned to the completion of the Preliminary Assessment.
- Several unauthorized consultants (including untrained Industrial Hygienists), have been performing consultation in illegal drugs labs in Colorado. Use of these consultants will result in a fatal flaw in the work. This, or any other fatal flaw in compliance with the State Regulations, will prevent the registered owner from receiving the liability immunity provided by CRS §25-18.5-103(2).
- According to Regulation 6 CCR 1014-3, any cleaning and/or remediation and/or decontamination is <u>strictly prohibited</u>, except pursuant to a completed Preliminary Assessment.

### INTRODUCTION

On Tuesday, August 24, 2010, personnel from Forensic Applications Consulting Technologies, Inc. (FACTs) was contracted to perform a standard cursory evaluation for the presence of methamphetamine at Room 328 of the Super 8 Hotel located at 7240 West Jefferson Ave., Lakewood CO (the subject property).

Consistent with the Colorado Real Estate methamphetamine disclosure and testing statute CRS §38-35.7-103(2)(a), FACTs collected a standard five-part composite sample for the quantitative determination of the presence of methamphetamine from five different locations in the subject property. The sampling data quality objectives (DQOs) employed, as described in our August 23, 2010, bid cover letter, were to determine, within normal analytical confidences, the possibility of presence of detectable levels of methamphetamine at the subject property.

The samples were collected by Mr. Caoimhín P. Connell, who is an Industrial Hygienist, as that term is defined in CRS §24-30-1402.

Based on state of the art sampling and analysis techniques, we conclusively determined the presence of methamphetamine in the residential structure. Therefore, based on current statutes and regulations, the property meets the definition of an "illegal drug laboratory" as described below. Also, analytical results from the subject property have conclusively demonstrated noncompliance with Colorado State regulations and State statutes as described in the body of the report.

Pursuant to State Statute, a "Preliminary Assessment" as described in Part 4 of 6 CCR-1014-3 must be performed at the property. Based on our observations, the Preliminary Assessment has no probability of resulting in a "Decision Statement" to release the property without the need for remediation.

According to current State of Colorado Regulations and Statutes, this report serves as "Discovery" as that term is found in Colorado Revised Statutes §25-18.5-103 and "Notification" as that term is used in CRS §25-18.5-103 (1)(a).

Based on this finding, after notification, entry into the property is <u>prohibited</u> by statute CRS §25-18.5-104. The prohibition of entry extends to the owner, house cleaning staff, the seller, the owner's representative(s), bank representatives, home inspectors, Realtors, and anyone else "...unless the person is trained or certified to handle contaminated property pursuant to board rules or federal law."

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<sup>&</sup>lt;sup>1</sup> Colorado Department Of Public Health And Environment, State Board Of Health, *Regulations Pertaining to the Cleanup of Methamphetamine Laboratories*, 6 CCR 1014-3, although <u>not</u> applicable at the time of our sampling, was used as a sampling reference.

### **Background Information**

### Structure

The subject property was a standard sized guest room located on the third floor of the hotel super structure. The subject property approximated 600 square feet of interior occupiable space. At the time of our visit, the guest room was unoccupied, and had been stripped of the bed clothes.

### PERTINENT REGULATORY STANDARDS

The State of Colorado currently has one methamphetamine regulation and three methamphetamine statutes that are germane to the subject property.

### State Statutes

### **Environmental Statutes**

Colorado has one of the country's most comprehensive and scientifically based clandestine drug laboratory regulations. The Colorado 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*, <sup>2</sup> and the owner of the property where the "illegal drug laboratory" is located has received notice.

In turn, "illegal drug laboratory" is defined in Colorado Revised Statutes §25-18.5-101(2.7) as the areas where controlled substances, have been manufactured, processed, cooked, disposed of, <u>used</u>, or <u>stored</u> and all proximate areas that are likely to be contaminated as a result of such manufacturing, processing, cooking, disposal, use, or storing.

Pursuant to State statute CRS §25-18.5-105(1), an illegal drug laboratory that has not met the cleanup standards set by the State Board of Health <u>must</u> be deemed a public health nuisance, and must either be demolished or remediated pursuant to a *legitimate* Preliminary Assessment.

### **Property Statutes**

Pursuant to CRS §38-35.7-103 (1), a buyer of residential real property has the right to test the property for the purpose of determining whether the property has ever been used as a methamphetamine laboratory.

The fatal flaws of CRS §38-35.7-103, notwithstanding, pursuant to CRS §38-35.7-103 (2)(a):

If the buyer's test results indicate that the property <u>has</u> been used as a methamphetamine laboratory but has not been remediated to meet the standards established by rules of the state board of health..., the buyer shall promptly give written notice to the seller of the results of the test, and the buyer may terminate the contract.



<sup>&</sup>lt;sup>2</sup> CRS §25-18.5-103

In this case, the presence of high levels of methamphetamine is a conclusive indicator that the property was used to manufacture store or use methamphetamine in that room.

Contrary to common misconception, by virtue of these findings, any second test performed pursuant to CRS §38-35.7-103(2)(b) that fails to confirm the presence of methamphetamine **cannot** be used to release the registered owner from the statutory requirements to perform the required Preliminary Assessment, since the discovery and notification have already occurred pursuant to CRS §25-18.5-103 (1)(a) and Colorado regulations 6 CCR 1014-3. Pursuant to State statutes, any additional testing by another Industrial Hygienist can <u>only</u> be used if the data <u>support</u> these initial findings; the data are <u>not</u> permitted to be used to refute, rebut or counter these findings, and cannot be used to provide the seller with regulatory relief.

### Criminal Proceedings – Public Nuisance Statutes

Pursuant to State statute CRS §16-13-303(c)(1), every building or part of a building including the ground upon which it is situated and all fixtures and contents thereof, and every vehicle, and any real property <u>shall</u> be deemed a class 1 public nuisance when used for the unlawful <u>storage or possession</u> of any controlled substance, or any other drug the possession of which is an offense under the laws of Colorado. Based on CRS §16-13-303(c)(1), the presence of extant methamphetamine in the property is *prima facie* evidence of possession of the same.

Pursuant to State statute §16-13-308)(1)(a), if probable cause for the existence of a Class 1 Public Nuisance is shown to the court by means of a complaint supported by an affidavit, the court shall issue a temporary restraining order to abate and prevent the continuance or recurrence of the nuisance or to secure property subject to forfeiture. Such temporary restraining order shall direct the County Sheriff or a peace officer to seize and, where applicable, close the public nuisance and keep the same effectually closed against its use for any purpose until further order of the court.

An alternative declaration of Public Nuisance may be found in statute §16-13-307(4), wherein an action to abate a public nuisance may be brought by the district attorney, or the attorney general with the consent of the district attorney, in the name of the people of the State of Colorado or in the name of any officer, agency, county, or municipality whose duties or functions include or relate to the subject matter of the action.

The jurisdiction for the abatement of the public nuisance lies with the office of the "Governing Body" which is:

Mr. Craig Sanders Environmental Protection Supervisor Jefferson County Department of Health and Environment 1801 19th Street Golden, CO 80401



FACTs will forward a copy of this report to the Governing Body on Friday, September 3, 2010

### State Regulations

Pursuant to Colorado regulations 6 CCR 1014-3, <sup>3</sup> following discovery and notification, a comprehensive and detailed "Preliminary Assessment" must be commissioned by the property owner and performed by an authorized (properly trained Industrial Hygienist) who must perform and complete several mandatory elements of the compliance process. The content and context of the "Preliminary Assessment" is explicitly delineated by regulation. Any remediation or cleaning of the property <u>must</u> be based on the Industrial Hygienist's Preliminary Assessment, and cannot occur until such assessment has been conducted.

Since discovery and notification had not, to our knowledge, taken place at the time of our visit, FACTs was not performing a "Preliminary Assessment" as that term is defined in State regulation, and this work does not meet the definition of a "Preliminary Assessment" and cannot be used or otherwise substituted for a Preliminary Assessment.

Furthermore, no retesting of the property can challenge these data or provide regulatory relief unless the retesting is performed as part of the testing required to issue a Decision Statement (which must be based on a Preliminary Assessment).

### ASSESSMENT PROTOCOLS

### Sampling Protocol

This Industrial Hygiene evaluation was performed pursuant to the Colorado's Real Estate methamphetamine disclosure and testing statute as described by CRS §38-35.7-103(2)(a).

According to Colorado revised statutes,<sup>4</sup> 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.

During our cursory evaluation, the hypothesis was made that the subject property was devoid of detectable concentrations of methamphetamine at a specified limit of detection and data would be collected to support the hypothesis. As such, the data quality objectives were not designed to quantify or characterize the *extent* or degree of contamination, but rather to support the statement: "Methamphetamine is <u>not</u> present in the property above specified levels."



<sup>&</sup>lt;sup>3</sup> Titled: Colorado Department Of Public Health And Environment, State Board Of Health, *Regulations Pertaining to the Cleanup of Methamphetamine Laboratories*.

<sup>&</sup>lt;sup>4</sup> CRS 38-35.7-103(3)(a)

Our DQOs were such that we selected a total sampling area that would result in a reportable quantity limit of  $0.1~\mu g/100cm2$ . That is, unless the concentration of the methamphetamine in the sample submittal exceeded  $0.1~\mu g/100cm2$ , the laboratory would report the concentration as "below detection limit." The value of  $0.1~\mu g/100cm2$  was selected since according to the State of Colorado Regulations, the minimum permissible concentration of methamphetamine allowed as determined during compliance sampling is  $0.1~\mu g/100cm2$  for a five part composite. The Table below presents the locations from which the composites were collected.

Sample ID	Location in Room 328	Result	Threshold µg/100 cm2	Status
SM082410-01A	Top of microwave cabinet			
SM082410-01B	Top of shower stall			
SM082410-01C	Top of south wall light	Positive	0.10	FAIL
SM082410-01D	Top of entrance door jamb			
SM082410-01E	Top of mirror frame			

Table 1
Sample Locations

### Sample Results

The actual methamphetamine *concentrations* found in the samples taken at the subject property, are <u>not</u> required to be reported, and are <u>not</u> germane to the data quality objectives. To avoid confusion, the results are not reported here, however, the sample results indicated that the contaminated surfaces ranged from an high of  $60 \mu g/100 cm2$  to a low of  $12.2 \mu g/100 cm2$ .

Contrary to popular misconception, there is no *de minimis* concentration during a Preliminary Assessment 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.<sup>5</sup>

Sample concentration results are only germane exclusively at the end of a project. In an unofficial opinion issued by the State of Colorado Department of Public Health and the Environment,<sup>6</sup> the state opined that even when the cursory concentrations are far below state mandated limits:

<sup>&</sup>lt;sup>6</sup> Email transmission from Craig Sanders to FACTs, January 31, 2008, quoting Coleen Bresnahan, CDPHE, regarding a property at 32548 Kinsey Lane Conifer, Colorado.



<sup>&</sup>lt;sup>5</sup> Ihid.

"Performing a PA [Preliminary Assessment] and clearance sampling is the only way to meet the requirements of the Rea, get the liability shield, and provide protection for future Real Estate transactions."

For this project, we selected a reportable quantity that was designed to avoid unnecessarily triggering the state regulations if merely trace amounts of methamphetamine were identified. The reportable quantity was selected to ensure that only concentrations that were of a potential regulatory concern were identified.

A recurring myth is that if sampling (such as that performed at the subject property) finds methamphetamine, but the concentration is less than 0.5 micrograms per one hundred square centimeters (µg/100cm2) of surface area, 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 an Industrial Hygienist performs non-mandatory sampling (such as performed at the subject property) during an industrial hygiene evaluation, and those samples result in ANY contamination, even below the value of 0.5 µg/100cm<sup>2</sup>, then the property must, by state regulation, be declared an illegal drug laboratory. This is due to the fact that cursory sampling does not meet the data quality objectives upon which the State clean-up level of "0.5 µg/100cm2" value is based.

In any event, contrary to popular belief, the mere value of "0.5 μg/100cm2" is not the State of Colorado cleanup level, but rather is the value upon which the final cleanup level is based and which is described in the mandatory Appendix A of the State regulations. The Colorado clearance level of "0.5 µg/100cm2," frequently misquoted by members of the general public, applies exclusively as *prima facie* evidence of decontamination at the end of a project and is that attainment threshold occasionally needed to issue a "decision" statement" (final clearance).

The submitted composite collected at the subject property conclusively contains methamphetamine at concentrations overtly in excess of State thresholds. If the composite sample had been collected and submitted as part of final verification sampling conducted pursuant to Colorado regulation 6 CCR-1014-3, the results would have indicated that the concentrations were at least 120 times the statutory clean-up limit permitted by regulation, with a 20% probability that a surface in the room exceeds 600 times the allowable limit for a composite sample. A copy of the laboratory report is included with this discussion as Appendix A.

Our testing produced results that failed to support our initial hypothesis (that the property did not have evidence of methamphetamine at detectable limits), and we therefore accept the null hypothesis; viz. the subject property conclusively contains methamphetamine at detectable limits.

<sup>&</sup>lt;sup>7</sup> Colorado Department Of Public Health And Environment, State Board Of Health, *Regulations Pertaining* to the Cleanup of Methamphetamine Laboratories, 6 CCR 1014-3.



Our data also suggest that there is no probability that the methamphetamine concentrations in the property are such that upon completion of the mandatory Preliminary Assessment, conditions at the property would permit the Industrial Hygienist to issue a Decision Statement directly from the mandatory Preliminary Assessment.

### **Sample Collection**

Using standard industrial hygiene methods, we collected one 5-part composite sample from Room 328 in the primary structure. The sample was submitted to Analytical Chemistry, Inc. for quantitative analysis using gas chromatography coupled with mass spectrometry. Analytical Chemistry Inc. is one of the laboratories listed in Colorado's regulations as being proficient in methamphetamine analysis.

### Wipe Samples

The wipe sample media was individually wrapped commercially available *Johnson & Johnson*<sup>TM</sup> 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. The sampling media were prepared off-site in small batches in a clean environment. The sample media were inserted into individually identified polyethylene centrifuge tubes with screw caps and assigned a unique sample identifier.

### Field Blanks

Our data quality objectives included a field blank; two field blanks were included in a simultaneous analysis batch and were identified as OVRM082310-8 and OVRM082310-19. The mass of methamphetamine in each blank was below the analytical detection limit. Therefore, we are confident that the methamphetamine reported by the laboratory was due to surface contamination in Room 328, and not due to trace contamination associated with the sampling materials.

### Field Duplicates

For the purposes of the data quality objectives associated with this cursory evaluation, no duplicates were required, and none were collected.

### **FOLLOW-UP ACTIONS**

A State mandated "Preliminary Assessment" must be conducted at the subject property.

### **CONCLUSIONS**

Based on our objective sample results collected during our August 23, 2010, evaluation, the subject property contains methamphetamine.

Based on the presence of methamphetamine, the property meets the definition of an illegal drug lab <u>and</u> Class 1 public nuisance as defined in State statutes.



Pursuant to State statues, the illegal drug lab has been "otherwise discovered." Pursuant to statute, a Preliminary Assessment <u>must</u> be performed pursuant to regulation by an authorized Industrial Hygienist, and a "decision statement" obtained, or the property must be demolished. Pursuant to CRS §38-35.7-103(2)(a), a buyer (if one exists and for whom these results have been generated) must promptly give written notice to the seller of the results of the testing, and the buyer may terminate the contract.

Prepared by:

Caoimhín P. Connell

Forensic Industrial Hygienist

# APPENDIX A LABORATORY REPORT



4611 S. 134th Place, Ste 200 Tukwila WA 98168-3240

Website: www.acilabs.com

Phone: 206-622-8353 E-mail: info@acilabs.com

Lab Reference:	10151-10
Date Received:	August 25, 2010
Date Completed:	August 27, 2010

August 27, 2010

CAOIMHIN P CONNELL FORENSIC APPLICATIONS INC 185 BOUNTY HUNTER'S LN BAILEY CO 80421

CLIENT REF: Ramada

SAMPLES: W

wipes/1

ANALYSIS:

Methamphetamine by Gas Chromatography-Mass Spectrometry.

RESULTS:

in total micrograms (ug)

Sample	Methamphetamine, ug	% Surrogate Recovery
SM082410-01	3.91	99
QA/QC Method Blank	< 0.004	
QC 0.100 ug Standard	0.097	
QA 0.020 ug Matrix Spike	0.022	
QA 0.020 ug Matrix Spike Duplicate	0.021	1
Method Detection Limit (MDL)	0.004	1
Practical Quantitation Limit (PQL)	0.030	1

'<': less than, not detected above the PQL

Robert M. Orheim

**Director of Laboratories** 

# CDL SAMPLING & CUSTODY FORM

ANALYTICAL CHEMISTRY INC.
4611 S 134th Pl, Ste 200 Tukwila WA 98168-3240
Website: www.acilabs.com

Phone: 206-622-8353 FAX: 206-622-4623

of

PagePlease do not write in shaded areas.

SAMPLING DATE (24, 2010  PROJECT Name/No: (RA MADA) A  EMAII: Fiosrach@aol.com  SAMPLER NAME: Caoimhín P. Connell  LAB  Sample Number  SM Ø 82410 - 9		REPORT TO:	Caoimhín P. Connell	P. Connell			AMAIVE	ANAI YSIS BEQUESTED	TED
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SAMPLER NAME: Caoimhín P. Cor LAB Sample Number SAMPLEN NAME: Caoimhín P. Cor LAB SAMPLEN NUMBER NAME SAMPLEN NAMB SAMPLEN		COMPANY:	Forensic A	Forensic Applications, Inc.	s, Inc.		1 Methams 2 Use entir	Methamphetamine Use entire contents	
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PRINT NAME Signature		COMPANY	DATE	TIME	Turnaround Time	nd Time	Custody Seals:	(Yes)	No
Caoimhín P. Connell	FACT	FACTs, Inc.	8 124/2010	1330	☐ 24 Hours (2X)	rs (2X)	Container:	(Intact)	Broken
MIA SAZON CORE	R	ACT	8/25/10	1300	(1.75X)	(1.75X)	Temperature:	Ambient	Cooled
					☐ 3 Days (1.5X)	(1.5X)	Inspected By:	MIA SAZON	AZON
					X Boutine	(1)	Lab File No.	10/51-10	0/-

# APPENDIX B CONSULTANT'S SOQ





# FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC. CONSULTANT STATEMENT OF QUALIFICATIONS

(as required by State Board of Health Regulations 6 CCR 1014-3 Section 8.21)

FACTs project name:	Ramada	Form # ML15
Date August 23, 2010		
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. He has been a practicing Industrial Hygienist in the State of Colorado since 1987; and he is the contract Industrial Hygienist for the National Center for Atmospheric Research and has been involved in clandestine drug lab (including meth-lab) investigations since 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 over 200 hours of methlab training for officers of over 25 Colorado Police agencies, 20 Sheriff's Offices, federal agents, and probation and parole officers from the 2<sup>nd</sup>, 7<sup>th</sup> and 9<sup>th</sup> 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; 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), and the Occupational Hygiene Society of Ireland. Mr. Connell is an Subject Matter Expert for the Department of Homeland Security, IAB Health, Medical, and Responder Safety SubGroup, and he conducted the May 2010 Clandestine Drug Lab Professional Development Course for 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 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 condominia. Mr. Connell has conducted over 185 assessments in illegal drug labs, and collected over 1,600 samples during assessments (a detailed list of drug lab experience is available on the web at: <a href="http://forensic-applications.com/meth/DrugLabExperience2.pdf">http://forensic-applications.com/meth/DrugLabExperience2.pdf</a>

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.