



**FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.**

**Regulatory Audit  
of  
Preliminary Assessment Report  
By  
Robert Woellner  
at an  
Identified Illegal Drug Laboratory**

**Located at:  
410 Garfield Avenue  
Carbondale, CO 81623**

**(200 Violations of 6 CCR 1014-3)**

Prepared by:

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## EXECUTIVE SUMMARY

Forensic Applications Consulting Technologies, Inc. (FACTs) is a private S-Corporation in the State of Colorado offering classical Industrial Hygiene services to its clients.

FACTs is performing a series of regulatory audits on public domain documents. This document has been prepared by Forensic Applications Consulting Technologies, Inc. in response to actions by the Colorado Department of Public Health and Environment (CDPHE), and pursuant to the provisions of C.R.S. 18-8-115 *Duty to report a crime - liability for disclosure*.

This review pertains to the document identified as:

Robert Woellner  
Quality Environmental Services Testing  
Methamphetamine Preliminary Assessment Inspection, Sampling  
& Recommended Scope of Work  
Re: 410 Garfield Avenue in Carbondale, CO 81623  
Prepared for  
Ken Olson  
410 Garfield Ave.  
Carbondale, CO 81623  
March 2, 2015

The purpose of this review is to document regulatory violations associated with regulatory work regarding the assessment of methamphetamine affected properties (6 CCR 1014-3). The level of scrutiny and detail employed in this review is that which has been established by the Colorado Department of Public Health and Environment.

For this regulatory audit, FACTs has identified no fewer than 200 regulatory violations. This particular consultant, Mr. Robert Woellner, has an extensive history of regulatory violations, invalid drug laboratory assessments, falsification of real estate documents, and claims to credentials that are unsupported.<sup>1,2,3,4,5,6,7,8,9</sup>

<sup>1</sup> 131 South Benton Street Denver, CO <http://forensic-applications.com/meth/censoredcriticalreview.pdf>

<sup>2</sup> 100 W. Spaulding Street, Lafayette, Colorado [http://forensic-applications.com/meth/Spaulding\\_Regulatory\\_audit\\_Redacted.pdf](http://forensic-applications.com/meth/Spaulding_Regulatory_audit_Redacted.pdf)

<sup>3</sup> 4893 S Johnson Street, Denver [http://www.forensic-applications.com/meth/Johnson\\_Critical\\_review.pdf](http://www.forensic-applications.com/meth/Johnson_Critical_review.pdf)

<sup>4</sup> 788 W. Lois Ct., Louisville, CO 80027

<sup>5</sup> 1138 West 32nd Street, Unit 201, Denver, CO

<sup>6</sup> 48400 Routt County Road 56C, Steamboat Springs, CO 80487

<sup>7</sup> 11767 Grant Street, Northglenn, Colorado 80233

<sup>8</sup> 690 S. Lincoln Street, Denver, CO 80203



The purpose of this review is to document regulatory violations associated with regulatory work regarding the sampling of methamphetamine affected properties (6CCR 1014-3).

FACTs obtained a copy of the report under review through the Colorado Open Records Act (CORA) directly from the Colorado Department of Public Health and Environment (CDPHE).

## **REVIEW OF THE PRELIMINARY ASSESSMENT**

During the performance of a Preliminary Assessment of a methamphetamine affected property, the Consultant is required by regulations to perform specific mandatory tasks and provide specific mandatory documentation.

In reviewing the Preliminary Assessment report by Mr. Woellner, for 410 Garfield Avenue in Carbondale, CO 81623 (the subject property), the following regulatory violations have been identified:

### ***Failure to Provide Qualified Personnel***

#### **Violation of Section 4.0**

According to regulations, the performance of a Preliminary Assessment, can only be performed by certain personnel.

#### PART 2: TRAINING AND CERTIFICATION REQUIREMENTS

##### 3.0 Interim Authorization

3.1 Persons who, as of the effective date of this Part 2 of these regulations, are performing assessment or decontamination activities subject to these regulations may continue to perform such activities, as long as they comply with the requirements of this section 3.

In reality, there is no evidence that Mr. Woellner, prior to the date of the work at 410 Garfield Avenue in Carbondale, CO 81623 has ever been "...performing assessment or decontamination activities subject to these regulations..." It would appear that the CDPHE granted Mr. Woellner interim authorization in violation of the regulations they were entrusted to enforce. This may in part be due to the fact that Ms. Colleen Brisnehan, with the CDPHE (and in charge of granting interim authorization to perform assessments at methamphetamine affected properties) has historically been identified as serving on the Board of Directors for the "Colorado Association of Meth and Mold Professionals," a largely discredited group of untrained practitioners to which Mr. Woellner has claimed membership.

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<sup>9</sup> 8347 S Reed Street, Unit 2, Littleton CO 80128



It may also be due to the fact that Ms. Brisnehan was actually caught personally assisting Mr. Woellner in the collection of unlawful samples at a project,<sup>10</sup> which Ms. Brisnehan then lied to the occupant claiming the assessment and cleaning work had been performed according to State regulations when in fact, none of the assessment, none of the cleaning and none of the post remediation confirmation work had been performed according to regulations. It would appear that to try and protect her office, Ms. Brisnehan felt compelled to grant certification to her fellow CAMMP member who otherwise has no documentable training in the assessment of illegal drug laboratories, has never actually performed a valid assessment in Colorado, and is not an Industrial Hygienist, (indeed during testimony under oath in 2009 was unable to correctly define “Industrial Hygiene”)

### ***Failure to Comply with Section 4***

During the performance of a Preliminary Assessment the Consultant is required to perform specific actions and provide specific information. The regulations are not optional, and the Consultant is not at liberty to waive any portion of the regulations.

4.0 Preliminary Assessment. A preliminary assessment of all methamphetamine-affected properties shall be conducted in accordance with this section and Section 6.1.2 of these regulations, ...The Consultant shall personally inspect the subject property to gather all of the information necessary to prepare a Preliminary Assessment Report (other than the legal description of the subject property and the background information described in Section 4.2), and shall document information collected through photographs, notes, and other appropriate methods. The Consultant shall evaluate the information collected during the preliminary assessment and record his or her observations and findings in a Preliminary Assessment Report. The Preliminary Assessment Report shall include, but not be limited to, the following, to the extent available and applicable:

### ***Violation of Section 4.2***

During the performance of a Preliminary Assessment, the Consultant is required by regulations to review specific mandatory information, including:

4.0 ...The Preliminary Assessment Report shall include, but not be limited to, the following, to the extent available and applicable:

4.2 Summary of information from review of available law enforcement reports regarding the manufacturing method, chemicals present, cooking areas, chemical storage areas, and areas of contamination, or waste disposal.

Nowhere in the report under review has Mr. Woellner documented that he attempted to obtain law enforcement documents or ascertain the availability of such documents. In his report, Mr. Woellner claims that he made several phone calls to Law Enforcement. However, considering the long history of documented fabrications from this individual, without documentation, it is difficult to know if any such attempts were actually made; certainly there were no documented attempts to ascertain law enforcement documents.

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<sup>10</sup> 4893 S Johnson Street, Denver [http://www.forensic-applications.com/meth/Johnson\\_Critical\\_review.pdf](http://www.forensic-applications.com/meth/Johnson_Critical_review.pdf)



### **Failure to Comply with 4.3.2**

During the performance of a Preliminary Assessment the Consultant is required to provide specific information including:

4.3.2 A description of the integrity of the building floor, and if there is a crawl space, a description of any signs of access, storage, venting, or disposal related to methamphetamine manufacturing, integrity of any vapor barriers, and any signs of disposal onto the soil of the crawl space. The soil investigation shall be conducted in accordance with the assessment procedures in Section 6 of this Part 1. If the vapor barrier is intact and in good condition, and if there is no indication of chemical disposal, the soil beneath the vapor barrier may be presumed to meet the cleanup criteria, and no soil sampling is required.

In the Garfield Avenue Preliminary Assessment report, Mr. Woellner makes the contradictory statements of:

*Possible chemical storage areas include the closets, cabinets, and crawl space.*

*All potential disposal areas were inspected, with no indication of waste disposal areas positively identified.*

Unfortunately, Mr. Woellner has an astonishing history of not seeing waste disposal when it is patently obvious. For example, while performing a Preliminary Assessment for the property located at 788 W. Lois Ct., Louisville, CO 80027-9795, Mr. Woellner included the following photograph in his report:



Quest Photograph

And yet in spite of his own photograph for the W. Lois Ct., Louisville CO project, Mr. Woellner stated:



*4.7 Identification of Contaminated Areas and Areas Sampled: QUEST generally inspected the exterior ground surface of the property and identified **no signs of waste piles, buried waste, burn pits, or chemical disposal on or around the exterior of the residence.***

As mentioned earlier, Mr. Woellner has never been able to document any training or specialized knowledge in illegal drug laboratories and would not be expected to possess the necessary skill set needed to identify signs of contamination.

Indeed, during one hearing, Mr. Woellner was barred from giving testimony as an expert in such matters. On July 17, 2008, in the matter of “913 Industrial Park / Colorado Casualty (Claim Number 902597160002),” Mr. Woellner was barred from giving testimony as an expert. (Curiously, later, while under oath in a different case,<sup>11</sup> Mr. Woellner falsely testified that he had never been barred from giving testimony).

We see examples of his lack of knowledge in such matter in his past reports where, for example, Mr. Woellner rambled on about “orange rinds”<sup>12</sup> being used for methamphetamine production (orange rinds are not used in methamphetamine production), and where he entirely failed to observe profound iodine staining in a pseudoephedrine Red-Phosphorous production laboratory located at 690 S Lincoln Street in Denver.<sup>13</sup> For the Lincoln Street property, there was extensive evidence of profound iodine contamination throughout the property, and yet Mr. Woellner entirely failed to observe the staining. (The photograph below shows the author of this review (Connell) in the basement of the Lincoln property pointing to heavy iodine contamination.

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<sup>11</sup> Transcript of the Testimony of Robert Woellner in the Matter of Fidelity and Deposit Company of Maryland v. White River Townhomes, LLC *et al*, November 19, 2009.

<sup>12</sup> See for example: 1138 West 32nd Street, Unit 201, Denver, CO [http://www.forensic-applications.com/meth/Addendum\\_2\\_Woellner\\_1138\\_32\\_St.pdf](http://www.forensic-applications.com/meth/Addendum_2_Woellner_1138_32_St.pdf)

<sup>13</sup> 690 S. Lincoln Street, Denver, CO 80203: [http://forensic-applications.com/meth/Woellner\\_Lincoln\\_Clearance\\_RA.pdf](http://forensic-applications.com/meth/Woellner_Lincoln_Clearance_RA.pdf)





FACTs Photograph - S. Lincoln St., Denver, CO  
Iodine Staining Basement Living Room

Yet since Mr. Woellner has no documentable training in the assessment of illegal drug laboratories, Mr. Woellner failed to recognize the stains for what they represent.

We see a continuation of incompetence in the assessment of the Garfield property wherein Mr. Woellner states:

*All potential chemical storage areas were inspected, with **Drano** and muriatic acid positively identified in a cabinet in the subject unit. Possible disposal areas include the sinks, toilet, bathtub, and outdoor and crawl space soils.*

DRANO,<sup>®</sup> like orange rinds, is not used in the production of methamphetamine. Similarly, in his report Mr. Woellner states:

*QUEST aggressively inspected the home and saw no visible iodine-stained areas; spray starch was not used.*

While spray starch may be a necessary “testing” item for the character “Walter White” on the TV show “Breaking Bad,” or on the “CSI” TV program, spray starch has no utility in the legitimate assessment of illegal drug laboratories.

Since, in violation of §4.14, Mr. Woellner provided only two limited views of the crawl space (failed to provide photographs of site conditions of the crawl space), it is unknown if disposal or storage occurred in the crawl space; the crawl space was not adequately assessed and/or documented.



Additionally, in his report, Mr. Woellner states:

*If the central heat system ducting is removed, install critical barriers on the upper (floor) side of the vent holes and maintain the critical barriers in good condition until the entire structure meets the cleanup criteria;*

Mr. Woellner failed to describe the “vent holes” or where they are located. There is no discussion on the floor penetrations as required. Clearly the “vent holes” would be a route of contaminant migration.

#### **Failure to Comply with 4.4.2**

During the performance of a Preliminary Assessment the Consultant is required to provide specific information including:

##### 4.4.2 Conditions indicative of contamination

As already addressed above, the contractor, Mr. Woellner, has no documented training or specialized experience in illegal drug laboratories and has no training in the assessment of the same and has no documented training even in the regulations (not including this audit, since December 15, 2014 - the effective date of the "new" regulations - FACTs, Inc. has reviewed eight reports by Mr. Woellner, and identified no fewer than 1,471 – one *thousand* four hundred and seventy one- regulatory violations in those eight reports). Therefore, there is no expectation Mr. Woellner would possess the necessary skill set needed to identify conditions indicative of contamination.

#### **Violation of Paragraph 4.5**

During the performance of a Preliminary Assessment the Consultant is required to provide specific information including:

##### 4.5 Identification of manufacturing methods based on the Consultant’s observations and law enforcement reports, if available.

Since Mr. Woellner did not document any attempts to ascertain the availability of law enforcement documents, such decisions could not be made from that source. Mr. Woellner states in his report:

*It is QUEST’s understanding that police arrested the tenant of the subject unit for possessing the substances and equipment needed for the manufacture of meth using the “one pot” method.*

Contrary to Mr. Woellner understanding, the “one-pot” method is not a single method, but rather a description of the equipment used. Depending on the law enforcement officer’s training, the name “one-pot method” can refer to different methods of manufacturing all using different chemicals, and resulting in different contaminants. This reviewer (Connell) has, under the supervision of the US Drug Enforcement Agency, manufactured methamphetamine using different street methods, including one of the



“one-pot” methods. It was the responsibility of Mr. Woellner to determine the manufacturing process to better understand the contaminants that may have been present.

### ***Failure to Comply with Section 4.6***

During the performance of a Preliminary Assessment, the Consultant is required by regulations to provide specific mandatory information, including:

4.6 Identification of chemicals used, based on the Consultant’s observations and knowledge of manufacturing method(s), and if available, identification and documentation of any methamphetamine lab wastes or precursor chemicals discovered at the subject property.

Mr. Woellner has never been able to demonstrate any knowledge in manufacturing methods, or document any recognizable training in illegal drug laboratories and therefore, one would not expect him to possess the necessary skills to recognize manufacturing methods based on his observations. Similarly since Mr. Woellner did not document any attempts to ascertain the availability of law enforcement documents, such decisions could not be made.

### ***Violation of Section 4.7 (Five violations)***

During the performance of a Preliminary Assessment, the Consultant is required by regulations to make certain decisions and take specific default positions, including:

4.7 ... In the case of single-family dwellings, all rooms, attics, crawl spaces, and forced air ventilation systems of all buildings on the subject property **must be assumed to be contaminated above the cleanup standards of Section 7, unless sampling conducted in accordance with the clearance level sampling protocols of Section 6 demonstrates the absence of such contamination in a given room, attic, crawl space, or ventilation system.**

Due to the poor documentation of site conditions, the actual nature of the property is ambiguous. However, in his report, Mr. Woellner explicitly states:

*The property contains a single family home and two outbuildings.*

The QUEST report contains much that is contradictory. For example, in his report, Mr. Woellner states:

*The residence contains baseboard radiant heat with no forced air systems, ducting, or air conditioning system in common.*

Then Mr. Woellner explicitly identifies a central ducted heating system:

*If the central heat system ducting is removed, install critical barriers on the upper (floor) side of the vent holes and maintain the critical barriers in good condition until the entire structure meets the cleanup criteria;*



As such, in violation of Section 4.7 (and Section 6.8.1), Mr. Woellner presumed the following without conducting sampling as required:

1. The central ducted heating system was compliant
2. All personal belongings were compliant
3. Outbuilding Number 1 was compliant
4. Outbuilding Number 2 was compliant
5. Mr. Olsen's area was compliant
6. Crawlspace was compliant (as discussed later, Mr. Woellner falsely claimed he collected 400 cm<sup>2</sup> from the crawlspace when in fact, Mr. Woellner collected only three 100cm<sup>2</sup> areas from the crawlspace, and therefore, the crawlspace was not compliant as claimed, instead, the concentration of methamphetamine in the crawlspace was in fact 7.5 µg/100cm<sup>2</sup> and not 4.0 µg/100cm<sup>2</sup> as falsely claimed by Mr. Woellner in his report).

### ***Failure to Comply with Section 4.8***

During the performance of a Preliminary Assessment, the Consultant is required by regulations to make certain decisions and take specific default positions, including:

4.8 Identification and documentation of chemical storage areas, waste disposal areas, cooking areas, and/or use areas, if known.

As already addressed, failing to have obtained law enforcement documents, and lacking any documented training in the assessment of illegal drug laboratories, and not being an Industrial Hygienist, and having an established history of failing to recognize chemical storage areas, waste disposal areas, cooking areas, and/or use areas, there is no way Mr. Woellner would possess the necessary skill set to comply with this provision.

### ***Failure to Comply with Section 4.9***

During the performance of a Preliminary Assessment, the Consultant is required by regulations to make certain decisions and take specific default positions, including:

4.9 Identification and documentation of signs of contamination such as staining, etching, or fire damage.

As already addressed, failing to have obtained law enforcement documents, and lacking any documented training in the assessment of illegal drug laboratories, and not being an Industrial Hygienist, and having an established history of failing to recognize chemical storage areas, waste disposal areas, cooking areas, and/or use areas, there is no way Mr. Woellner would possess the necessary skill set to comply with this provision.

### ***Failure to Comply with Section 4.10***

During the performance of a Preliminary Assessment, the Consultant is required by regulations to make certain decisions and take specific default positions, including:



4.10 Description of plumbing system, including identification and documentation of potential disposal into the sanitary sewer or an on-site wastewater treatment system (OWTS).

In his report, Mr. Woellner makes the following statement:

*Inspection of Plumbing System: The plumbing system consists of PVC drain lines flowing into cast iron pipes.*

However, Mr. Woellner then provides the following photograph:



QUEST Photograph

The photographs provided by Mr. Woellner clearly show that the plumbing is very different than described in the report, and includes copper piping, and iron pipes connected directly to fixtures. Since, in violation of §4.14, there are no photographs of the site conditions showing the actual plumbing, one must assume that Mr. Woellner has merely employed his normal boiler plate language that is inserted into almost all his reports regardless of actual site conditions.

### ***Violation of Paragraph 4.11***

During the performance of a Preliminary Assessment the Consultant is required to provide specific information including:

4.11 For properties with multi-unit buildings, identification and documentation of other units and common areas where contamination may have spread or been tracked.

As is common for this consultant, the report contains much that is contradictory. For example, although Mr. Woellner states,

*The property contains a single family home and two outbuildings.*



Mr. Woellner then states,

*There is one wooden door between the homeowner's portion of the residence and the subject unit that was locked throughout the occupancy of the former tenant.*

And the report goes onward to describe a multifamily structure separated into Mr. Olsen's Residence and the residence of the tenant.

Mr. Woellner states:

*There is one wooden door between the homeowner's portion of the residence and the subject unit that was locked throughout the occupancy of the former tenant.*

It is astonishing that Mr. Woellner so lacks an understanding of contaminant migration that he believes aerosolized methamphetamine would somehow "know" this door separated to residences and would somehow decide not to migrate across the door into Mr. Olsen's residence.

It would further appear that Mr. Woellner made the a priori decision that Mr. Olsen's area was not contaminated, since Mr. Woellner never collected samples to determine if it was indeed compliant. Had valid samples been collected from Mr. Olsen's area, it would have been clear that Mr. Olsen's area was also contaminated. As it is, Mr. Woellner "cleared" Mr. Olsen's area without the collection of mandatory clearance samples.

### ***Violation of Paragraph 4.12 Failure to identify common ventilation***

During the performance of a Preliminary Assessment the Consultant is required to provide specific information including:

4.12 For properties with multi-unit buildings, identification and documentation of any common ventilation systems connected to other units or common areas.

In his report, Mr. Woellner identified the fact that both units are effectively the same ventilation, however, due to his lack of knowledge in Industrial Hygiene, he didn't know this was what he had done - Mr. Woellner states:

*There is one wooden door between the homeowner's portion of the residence and the subject unit that was locked throughout the occupancy of the former tenant.*

It is astonishing that Mr. Woellner so lacks an understanding of Industrial Hygiene and fugitive emissions that he did not understand that a common residential doorway does not separate ventilation zones, and the ventilation is common to the entire structure and is referred to as passive ventilation.



### **Violation of Paragraph 4.12 Failure to investigate commonly ventilated areas**

Furthermore, according to the regulations:

4.12 ...If contamination above the standard is identified in any unit in a multi-unit building, the units and common areas that are connected to the unit by ventilation systems **shall be investigated to determine whether they are also contaminated.**

Even though Mr. Woellner had complete access to the entire structure (and indeed even collected four random samples from “Olsen’s Unit”) Mr. Woellner entirely failed to assess the contamination in the structure.

### **Violation of Paragraph 4.12 Failure to document limited access (if claimed)**

If on the other hand, Mr. Woellner wants to claim he had no access due to lack of authority, then the regulations are explicit on what needs to be done:

4.12 ...If access is not available to inspect or sample the connected units or common spaces, the owner of the contaminated unit or their representative shall give notice to the owners and tenants of the units and common areas that are connected to the contaminated unit that methamphetamine contamination may be present. Notice shall also be given to the HOA, if one has been established. **The consultant shall document any limitations on access in the final report.**

Nowhere in the QUEST report is there any evidence that any of this was performed.

### ***Violation of Paragraph 4.14***

During the performance of a Preliminary Assessment the Consultant is required to perform specific activities including:

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

Mr. Woellner failed to comply with this requirement. Although there are multiple close-up photographs of templates (which demonstrate violation of §6.2.2) there are only two photographs showing the interior occupied space site conditions. There are no photographs of Mr. Olsen’s area, and there are no photographs of the outbuildings.

### ***Violation of Paragraph 4.15***

During the performance of a Preliminary Assessment the Consultant is required to perform specific tasks as delineated in §4.15:

4.15 If assessment sampling is conducted, it shall be conducted in accordance with Section 6 of this Part 1.

As described in the sections addressing Section 6 of this audit, Mr. Woellner entirely failed to comply with the mandatory sampling requirements.



### **Violation of Paragraph 4.15.2**

During the performance of a Preliminary Assessment the Consultant is required to perform specific tasks as delineated in §4.15.2:

4.15 If assessment sampling is conducted, it shall be conducted in accordance with Section 6 of this Part 1. Documentation of assessment sampling shall include:

4.15.1 a description of the sampling procedures used, including sample collection, handling, and QA/QC;

Nowhere in the QUEST report does Mr. Woellner address the QA/QC provided by the laboratory. In fact, QA/QC procedures are not even mentioned in the report.

### **Violation of Paragraph 4.15.3 (Five Violations)**

During the performance of a Preliminary Assessment the Consultant is required to provide specific information including:

4.15.3 results of sampling, including a description of sample locations and a computer generated figure illustrating the layout of the building(s) ...

Nowhere in the QUEST report do we find a computer generated figure of the layout of the buildings. The report states there is a second kitchen in Olsen's area, and apparently that is a separate room from Olsen's area, yet there is no depiction of that area in the drawing. The photograph of the exterior portion of the house clearly shows a second floor, however, there is no second floor in the drawing.

Therefore missing from the drawing is at least the following:

Olsen's area  
Olsen's kitchen  
Upstairs areas

In his report, Mr. Woellner makes the following statement:

*\*\*Crawl space sampling locations (02b and 02d) not pictured.*

And indeed, this is important since not only does it document that the drawing locations are not provided as required, but it also documents the fact that only two samples were collected from the crawlspace and not four as required by regulations (described later under Section 6).

### **Violation of Paragraph 4.16**

During the performance of a Preliminary Assessment the Consultant is required to provide specific information including:

4.16 Documentation of personal property assessment and discussion of items that require decontamination or disposal, and items that can be released to the owner



because the Consultant has determined, in accordance with Section 5.11.1.4 of this Part 1, that they are not contaminated.

Astonishingly, in his report, (in the only two photographs that document the site conditions inside the house), Mr. Woellner describes the personal belongings in the structure thusly:

*Moderate volumes of contents remained in the subject unit the time of our inspection. (sic)*

Which then accompanies the following photograph:



QUEST Photographs (Above and Below)

In the second photograph we see a similar description:





*Moderate volumes of contents remained in the subject at unit (sic) at the time of our inspection.*

In any event, in his report, Mr. Woellner simply falsified the record and stated the following:

*Based on QUEST's preliminary assessment and sampling, as well as the information reported to QUEST regarding the site background, it is QUEST's assessment that personal property located throughout the subject unit is likely to be contaminated and requires decontamination or disposal as detailed below.*

*o The personal property in question, or other personal property of similar material and located in the same room, **was determined to be below the cleanup standards with clearance sampling;** or*

*o **The personal property in question was located in a room that determined to be below the cleanup standards with clearance sampling and, in the Consultant's judgment, is unlikely to have been contaminated from exposure elsewhere in the property.***

As is documented in the QUEST report, neither statement is truthful. That is, contrary to the statement made in the report:

1. Mr. Woellner did **not** perform clearance sampling on the personal items, and
2. The personal items were **not** located in a room determined to be below the cleanup standards.



It is very common for this consultant, Mr. Woellner, to knowingly fabricate, out of whole cloth, statements in his reports.

### **Violation of Paragraph 4.17**

According to the regulations, if Clearance Sampling is conducted during the Preliminary Assessment, it shall be conducted pursuant to Section 6 of Part 1 of the regulations.

4.17 If clearance sampling is conducted during the preliminary assessment, it shall be conducted in accordance with Section 6 of this Part 1.

As documented in the discussion on Section 6, below, the sampling was not conducted pursuant to Section 6.

#### **Violation of Paragraph 4.17.1**

According to the regulations, if Clearance Sampling is conducted during the Preliminary Assessment, it shall contain specific information:

4.17 If clearance sampling is conducted during the preliminary assessment, it shall be conducted in accordance with Section 6 of this Part 1. Documentation of clearance sampling shall include:

4.17.1 A description of the sampling procedures used, including sample collection, handling, and QA/QC.

There is no discussion regarding the QA/QC of the sample suite and the terms QA/QC or quality control are not even mentioned in the report.

#### **Violation of Paragraph 4.17.4**

According to the regulations, if Clearance Sampling is conducted during the Preliminary Assessment, it shall contain specific information:

4.17 If clearance sampling is conducted during the preliminary assessment, it shall be conducted in accordance with Section 6 of this Part 1. Documentation of clearance sampling shall include:

4.17.4 Documentation of variations from standard practices.

In violation of §4.17.4 Mr. Woellner failed to document the over 200 (two hundred) variations from standard practices as delineated in this audit. In violation of Colorado Revised Statute §18-5-114 (*Offering a false instrument for recording*), Mr. Woellner falsely and knowingly made the following statement:

*4.17 Documentation of Variations from Standard Practices: QUEST did not vary from standard practices while conducting this preliminary assessment.*



### **Violation of Paragraph 4.17.5**

According to the regulations, if Clearance Sampling is conducted during the Preliminary Assessment, it shall contain specific information:

4.17 If clearance sampling is conducted during the preliminary assessment, it shall be conducted in accordance with Section 6 of this Part 1. Documentation of clearance sampling shall include:

4.17.5 A certification statement, signed by the Consultant, in substantially the following form: "I hereby certify that I conducted clearance sampling of the subject property in accordance with 6 CCR 1014-3, Part 1, § 6. I further certify that the cleanup standards established by 6 CCR 1014-3, Part 1, § 7 [**choose one**: have/have not] been met as evidenced by testing I conducted."

Although Mr. Woellner conducted clearance assessment sampling at the property, nowhere in the report do we find the mandatory language.

### **Violation of Section 6**

According to the regulations:

4.3.1 ...If preliminary assessment sampling is conducted, include the results of sampling in accordance with Section 6 of this Part 1.

And

4.7 ...In the case of single-family dwellings, all rooms, attics, crawl spaces, and forced air ventilation systems of all buildings on the subject property must be assumed to be contaminated above the cleanup standards of Section 7, unless sampling conducted in accordance with the clearance level sampling protocols of Section 6 demonstrates the absence of such contamination in a given room, attic, crawl space, or ventilation system. ... If the Consultant determines that assessment sampling is appropriate, such sample collection and analysis shall be conducted in accordance with the assessment level sampling protocols and other requirements of Section 6 of this Part 1.

And

4.15 If assessment sampling is conducted, it shall be conducted in accordance with Section 6 of this Part 1.

And

4.17 If clearance sampling is conducted during the preliminary assessment, it shall be conducted in accordance with Section 6 of this Part 1.

Therefore, it would be very difficult for a legitimate consultant to not know that if sampling is conducted it must be conducted pursuant to the provisions of Section 6. Yet as described below, Mr. Woellner followed virtually no aspect of Section 6 during sampling.



### Violation of Section 6.1.3

During the performance of a Preliminary Assessment and/or Clearance Sampling, the Consultant is required to perform specific tasks pursuant to specific protocols.

6.1.3 The following sample collection procedures shall be followed for screening level sampling, preliminary assessment sampling and clearance sampling, except as provided in Section 6.8.2 of this Part 1.

### Violation of Section 6.2.2 (8 Violations Failure to Delineate 100cm<sup>2</sup>)

During the performance of a Preliminary Assessment, the Consultant is required by regulations to follow specific sampling protocols including:

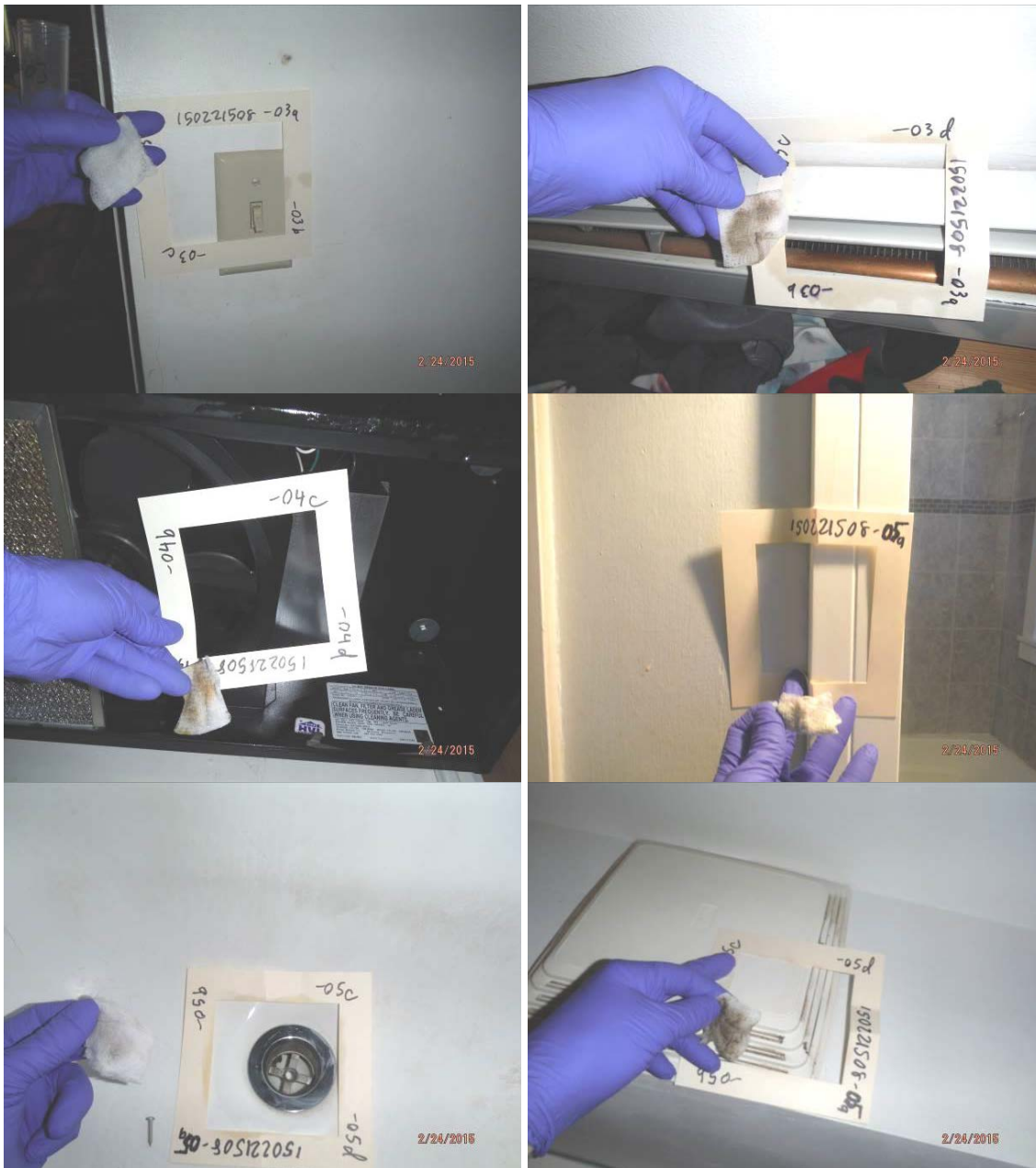
6.2.2 Delineate a 100 cm<sup>2</sup> area on the surface to be sampled, either by attaching a physical template to the surface (being careful not to touch the area within the template), or by an equivalently reliable and accurate method. The area within the template (i.e., the sample area) shall be 100 cm<sup>2</sup>.

In several photographs in the report, Mr. Woellner documents that he failed to delineate areas that were 100 cm<sup>2</sup>. In several locations, although Mr. Woellner merely placed a 100 cm<sup>2</sup> template over an item, in several samples, the area contains empty space and in some cases, the template area contains other items. Each of the following photographs were taken by Mr. Woellner at this subject property wherein Mr. Woellner documented that he failed to delineate 100 cm<sup>2</sup> in violation of §6.2.2:



QUEST Photographs





QUEST Photographs

**Violation of Section 6.2.2 (15 Violations Re-use of templates)**

During the performance of a Preliminary Assessment, the Contractor is required by regulations to follow specific sampling protocols including:

6.2.2 ... Physical templates may not be re-used.

Templates were re-used for the following 15 samples:

- 01b
- 01c
- 01d



- 02b
- 02c
- 02d
- 03b
- 03c
- 03d
- 04b
- 04c
- 04d
- 05b
- 05c
- 05d

### **Violation of Paragraph 6.2.7, 6.2.9, 6.2.10 (20 Violations)**

According to State regulations:

6.2.7 Wipe the surface using one of the following methods:

6.2.7.1 Square method: Start at the outside edge and progress toward the center of the surface area by wiping in concentric squares of decreasing size.

6.2.7.2 “S” method: Wipe horizontally from side-to-side in an overlapping “S”-like pattern as necessary to completely cover the entire wipe area.

6.2.8 Without allowing the sample media to come into contact with any other surface, fold the sample media with the sampled side in.

6.2.9 Use the same sample media to repeat the sampling of the same area using the same method. If using the “S” method, the second pass shall be sampled by wiping with overlapping “S”-like motions in a top-to-bottom direction.

6.2.10 Fold sampled side in. Using the same sample media, sample the same area a third time. The third pass shall be sampled by wiping using the method not previously used (i.e., use the square method if the “S” method was originally used).

To our knowledge, Mr. Woellner has never used the mandatory sampling method. There is nothing in his report that would indicate that he used the mandatory method and several of his photographs document the fact that he did not use the mandatory method. For example in the following photographs, it would have been a physical impossibility for Mr. Woellner to have used the mandated method and collect 100 cm<sup>2</sup>:





QUEST Photographs

Since Mr. Woellner has a very long history of not collecting lawful samples (under the protection of Ms. Brisnehan, CDPHE), there is no reason to believe that those samples on this project not depicted in the above photographs were collected according to regulations.

**Violation of Paragraph 6.2.14**

According to mandatory State regulations, during the performance of the work the Consultant is required to provide specific information in the report including:



6.2.14 Maintain a Chain-of-Custody Record covering the time of sample collection through final disposition. ... At a minimum, the Chain-of-Custody Record shall include the following:

**Violation of Paragraph 6.2.14.3 (Two Violations)**

6.2.14.3 sampler name and contact information;

Nowhere on the chain-of-custody has the identity of the person who collected the samples been provided.

Clearly, since the person who collected the samples has not been identified, the contact information for that person could not have been provided.

**Violation of Paragraph 6.2.14.5 (4 violations)**

6.2.14.5 sample area;

We know that 100 cm<sup>2</sup> was not collected for the following samples:

- 02a
- 03a
- 03d
- 04c
- 05c

Therefore, the sample areas provided on the chain-of-custody cannot be 400 cm<sup>2</sup> as claimed for the following samples:

- Sample 2
- Sample 3
- Sample 4
- Sample 5

**Violation of Paragraph 6.2.14.6 (6 violations)**

6.2.14.6 number of sample aliquots

This information is missing from Mr. Woellner's chain of custody.

**Violation of Paragraph 6.2.14.7 (6 violations)**

6.2.14.7 number of containers for each sample;

This information is missing for each sample submitted on the chain of custody.

**Violation of Paragraph 6.2.14.8 – Date of collection (6 violations)**

6.2.14.8 sample collection ... date;

This information is missing for each sample submitted on the chain of custody.



**Violation of Paragraph 6.2.14.8 – Time of collection (6 violations)**

6.2.14.8 sample collection time

This information is missing for each sample submitted on the chain of custody.

**Violation of Paragraph 6.2.14.9 (6 violations)**

6.2.14.9 sample matrix

This information is missing for each sample submitted on the chain of custody.

**Violation of Paragraph 6.2.14.11**

6.2.14.11 sample preservatives

This information is missing from Mr. Woellner’s chain of custody.

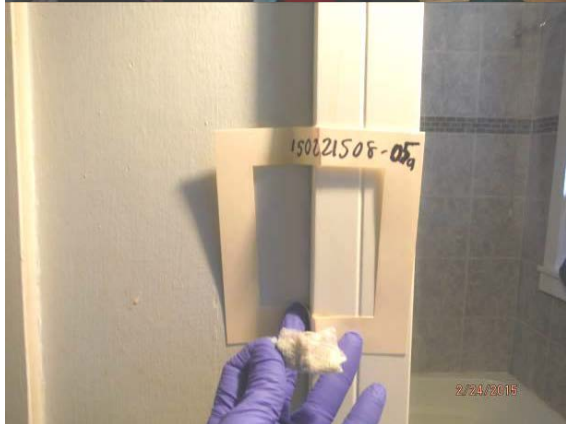
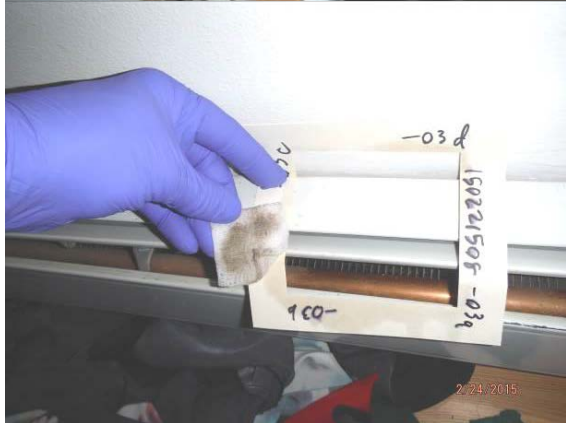
**Violation of Paragraph 6.3.6 (10 violations)**

According to mandatory State regulations, during the performance of the work the Consultant is required to perform specific tasks including:

6.3.6 Collect all individual aliquots from 100 cm<sup>2</sup> sampling areas.

As documented in the photographs below, Mr. Woellner failed to collect 100cm<sup>2</sup> for at least the following samples:





## **Violation of Paragraph 6.5**

According to mandatory State regulations, during the performance of the work the Consultant is required to perform specific tasks including:

6.5 Vapor Sample collection procedures. If the preliminary assessment indicates the phenyl-2-propanone (P2P) method of methamphetamine manufacturing was used, vapor samples for mercury **shall** be collected in accordance with the procedures for sample collection described in NIOSH Method 6009 as incorporated in Section 9 of this Part 1.

In his report, Mr. Woellner states that he does not know the manufacturing process used, and he made no documentable attempts to find out, and he otherwise has no documented training that would permit him to determine if the P2P method was otherwise used. Therefore, it would have been impossible for Mr. Woellner to comply with this provision.

## **Violation of Paragraph 6.8.1**

According to the regulations, upon the performance of a Preliminary Assessment, the Consultant is required to perform specific tasks, including:

6.8 Assessment level sampling protocols for buildings and personal property.

6.8.1 Except as provided in Section 6.8.2 below, the Consultant **shall** conduct sampling for methamphetamine that meets the clearance level sampling protocols of Section 6.9 in all rooms of a methamphetamine-affected property as part of the preliminary

The exception cited (§6.8.2) is that sampling is not required if the Consultant assumes the item is noncompliant and is not being cleared. For this property, Mr. Woellner never used the exception. Therefore, all the sampling was required to be in compliance with Section 6.9. However as documented above, and discussed in further detailed below, none of the sampling performed at the property was compliant with regulations.

## **Violation of Paragraph 6.8.2**

According to the regulations, upon the performance of a Preliminary Assessment, the Consultant is required to perform specific tasks, including:

6.8.2 ... Personal property located in rooms that are deemed to be contaminated is also deemed to be contaminated.

In violation of §6.8.2, in his report, Mr. Woellner falsely claimed:

- *The personal property in question, or other personal property of similar material and located in the same room, **was determined to be below the cleanup standards with clearance sampling**; or*
- ***The personal property in question was located in a room that determined to be below the cleanup standards with clearance sampling and, in the Consultant's judgment, is unlikely to have been contaminated from exposure elsewhere in the property.***



As is documented in the QUEST report, neither statement is truthful. That is, contrary to the statement made in the report:

1. Mr. Woellner did **not** perform clearance sampling on the personal items, and
2. The personal items were **not** located in a room determined to be below the cleanup standards.

### ***Violation of Paragraph 6.9 (Five violations)***

According to the regulations, upon the performance of a Preliminary Assessment, the Consultant is required to perform specific tasks, including:

**6.9 Clearance level sampling protocols for buildings and personal property.** The Consultant **shall** conduct clearance level sampling of any subject property that meets the definition of a methamphetamine-affected property, or that is suspected of being a methamphetamine-affected property as provided in Sections 3.2, 3.3 or 3.4 of this Part 1, to verify that cleanup standards have been met. ... Samples shall be collected according to the following criteria:

As documented below, Mr. Woellner failed to perform the sampling pursuant to the mandatory requirements. For this property, Mr. Woellner failed to collect samples from the following areas:

- Olsen's Kitchen
- Out building 1
- Out building 2
- Upstairs areas
- Personal Belongings

### ***Violation of Paragraph 6.9.1 (Nine Violations)***

According to the regulations, upon the performance of a Preliminary Assessment, the Consultant is required to perform specific tasks, including:

6.9.1 Except as provided in Section 6.9.1.1, at least 400 cm<sup>2</sup> of surface area shall be sampled from every room, attic, and crawl space.

In his report, Mr. Woellner documented the rooms and surface areas from which he collected his samples. Based on reviewing that information we find that none of the areas could have been declared as compliant based on the required sampling:



Area	Total area Collected (cm2)	Total Area Required (cm2)	Deficient (cm2)	Compliant?
Olsen's Room	380	400	20	No
Central closet	Indeterminable	400	Indeterminable	No
Crawler	190	400	210	No
Bedroom	Indeterminable	400	Indeterminable	No
Kitchen	308	400	92	No
Bathroom	354	400	46	No
Out building 1	0	400	400	No
Out building 2	0	400	400	No
Personal Belongings	0	400	400	No

Where we have used the term “Indeterminable” it simply means the surface area inside the template for one or more of the aliquots is so grossly defective that it is not warranted to calculate the actual surface area – and that aliquot is simply invalid.

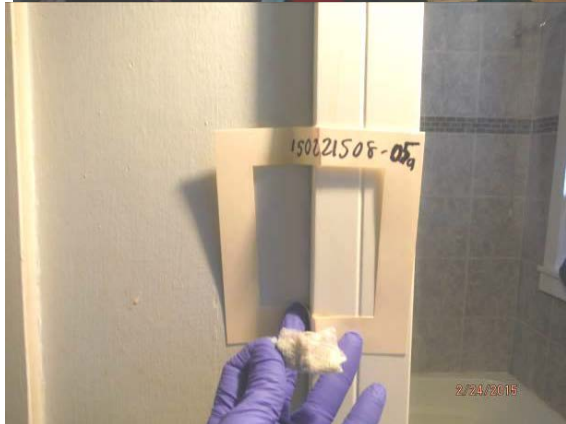
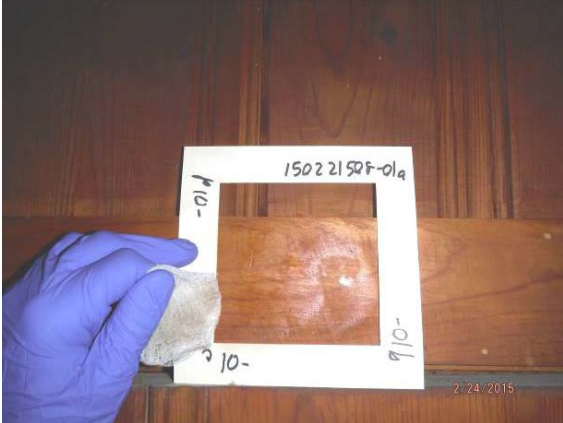
Examples of that kind of determination is exemplified in the following photographs:



QUEST Photographs

Otherwise, since Mr. Woellner uses a standard template that he has identified as being 10 cm X 10cm we are able to use that at a reference and using distortion correcting software, were are able to measure the actual surface are for other samples. Examples of those would include the following photographs taken by Mr. Woellner.





### **Violation of Paragraph 6.9.4 (Four Violations)**

According to the regulations, upon the performance of a Preliminary Assessment, the Consultant is required to perform specific tasks, including:

6.9.4 For buildings and structures that have forced air ventilation systems, at least 400 cm<sup>2</sup> of surface area of the ventilation system shall be sampled, unless the entire ventilation system is removed. Samples **shall** be collected from accessible areas within the heat exchanger unit, inside the cold air return system, from inside the supply air system, and from one other location selected at the Consultant's discretion. The Consultant will visually inspect accessible portions of the ventilation system and review photo documentation to verify that the system has been cleaned and is free of debris.

In his report, Mr. Woellner identifies the forced air system and states:

*If the central heat system ducting is removed, install critical barriers on the upper (floor) side of the vent holes and maintain the critical barriers in good condition until the entire structure meets the cleanup criteria;*

For this property, Mr. Woellner failed to collect the following samples from the ventilation system as required:

1. within the heat exchanger unit
2. inside the cold air return system
3. inside the supply air system
4. One additional sample at consultant's discretion

Therefore, the ventilation system was never cleared and remains contaminated.

### **Violation of Paragraph 6.9.6 (three violations)**

According to the regulations, upon the performance of a Preliminary Assessment, the Consultant is required to perform specific tasks, including:

6.9.6 Composite samples may be used for clearance sampling of rooms, attics, crawl spaces, and personal property, provided all aliquots comprising a composite sample come from the same room, attic, or crawl space.

For this property, although Mr. Woellner claims to have cleared the crawlspace, he then documents that only two of the aliquots used to clear the crawlspace were actually from the crawlspace:

- 02a Central Closet – Door handle to Mr. Olson's unit*
- 02c Central Closet – Top of hot water heater*
- 02b Crawl Space – Access hatch frame*
- 02d Crawl Space – Footing (concrete slab)*

In truth, when we look at the samples, only one of them was actually from the crawlspace (-02d Crawl Space – Footing (concrete slab))



In his report, Mr. Woellner claims to have cleared the entire area of Olsen's Unit, but collected only a single 4-parted composite consisting of aliquots from at least two different rooms, a living area and an otherwise unidentified kitchen:

- 01a Mr. Olson's Unit – Door to subject unit; top of frame
- 01b Mr. Olson's Unit – Floor by door to subject unit
- 01c Mr. Olson's Unit – Stairs above and west of door
- 01d Mr. Olson's Unit – Kitchen pantry shelf

### **Violation of Paragraph 6.9.7 (12 violations)**

According to the regulations, upon the performance of a Preliminary Assessment, the Consultant is required to perform specific tasks, including:

6.9.7 The interior of major appliances (microwaves, refrigerators, freezers, ovens, and dryers) must be sampled using discrete samples. The exterior of major appliances may be sampled using composite samples.

In his report, Mr. Woellner claims that Olsen's Unit is a regular residential unit with a kitchen (indeed Mr. Woellner claims he collected an aliquot from Olsen's kitchen and cleared the kitchen with a single 100 cm<sup>2</sup> aliquot).

Since it is a kitchen it is reasonable to assume the kitchen had a

- 1) A dishwasher
- 2) A stove
- 3) A refrigerator
- 4) Microwave

And since it is a normal unit, it is also reasonable to assume the residence cleared by Mr. Woellner also had a:

- 1) Clothes washer
- 2) Clothes dryer

Yet, in violation of §4.14 no photographs exist of the site conditions and no inventory of appliances was made, and when Mr. Woellner "cleared" the other unit, he did so without collecting the interiors of the appliances.

Furthermore, although FACTs disagrees with the **interpretation** of the State of Colorado CDPHE, Ms. Brisnehan (CDPHE) insists that the above cited regulations **requires** that the exterior of each appliance be sampled. To the extent they were present Mr. Woellner entirely failed to sample the exterior of the following appliances:

- 1) A dishwasher
- 2) A stove
- 3) A refrigerator
- 4) Microwave



- 5) Clothes washer
- 6) Clothes dryer

### **Violation of Paragraph 6.9.9**

According to the regulations, upon the performance of a Preliminary Assessment, the Consultant is required to perform specific tasks, including:

6.9.9 A composite sample of personal property is considered representative of contaminant levels on all personal property of that type material (non-porous, porous other than textiles/fabrics, or textiles/fabrics) within the same room. Should analysis of composite samples from multiple items indicate methamphetamine levels in excess of the cleanup standard, **all items from which the composite sample was comprised, and all items of that type material within the same room will be considered to be in excess of the cleanup standard, unless a discrete sample of an individual item demonstrates that the cleanup standard has been met on that item.**

In his report, Mr. Woellner claims

- o *The personal property in question, or other personal property of similar material and located in the same room, **was determined to be below the cleanup standards with clearance sampling;** or*
- o ***The personal property in question was located in a room that determined to be below the cleanup standards with clearance sampling and, in the Consultant's judgment, is unlikely to have been contaminated from exposure elsewhere in the property.***

Yet there are no samples or results for the assessment of personal items as claimed and, according to Mr. Woellner, the room which contained the personal item was contaminated with concentrations of methamphetamine ranging from 1.6 µg/100cm<sup>2</sup> to 35 µg/100cm<sup>2</sup>.

### **Violation of Paragraph 6.9.11 (16 Violations)**

During a Preliminary Assessment and Clearance Sampling, the consultant is required to follow specific sampling protocols, including:

6.9.11 ...Samples shall be collected from surfaces that have a reasonable potential to contribute to human exposure, including:

6.9.11.1 Areas expected to have the **highest levels of contamination**, such as cooking areas, chemical storage areas, and waste disposal areas.

In his report, Mr. Woellner has documented that he collected samples from areas expected to have the **lowest** levels of contamination, such as the areas door handles, interior walls, sink basins, and other low probability areas.

In fact, of the 20 samples collected only four were collected from surfaces that had an high expectation of contamination:



- 02c Central Closet – Top of hot water heater
- 04a Living Room/Kitchen – Shelf above couch
- 04c Living Room/Kitchen – Kitchen recirculating fan
- 04d Living Room/Kitchen – Top of kitchen cabinetry

The following list of sample aliquots were collected from surfaces expected to have the lowest concentrations:

- 01a Mr. Olson’s Unit – Door to subject unit; top of frame
- 01b Mr. Olson’s Unit – Floor by door to subject unit
- 01c Mr. Olson’s Unit – Stairs above and west of door
- 01d Mr. Olson’s Unit – Kitchen pantry shelf
- 02a Central Closet – Door handle to Mr. Olson’s unit
- 02b Crawl Space – Access hatch frame
- 02d Crawl Space – Footing (concrete slab)
- 03a Bedroom – Wall at light switch
- 03b Bedroom – Floor (central)
- 03c Bedroom – Northwest window sill and frame
- 03d Bedroom – West radiant heater
- 04b Living Room/Kitchen – TV screen
- 05a Bathroom – Mirror frame at burn mark
- 05b Bathroom – Sink
- 05c Bathroom – Tub
- 05d Bathroom – Exterior of exhaust fan

**Violation of Paragraph 6.9.11.2 (16 Violations)**

During a Preliminary Assessment and Clearance Sampling, the consultant is required to collect samples from specific areas, including:

6.9.11.2 Areas where contamination may have migrated, such as adjacent rooms or units, common areas, shared attics, shared crawl spaces, shared ventilation systems, and units connected to the contaminated unit by such attics, crawl spaces, or ventilation systems.

For this property, the area identified as “Mr. Olsen’s Unit” (both floors) is connected by common ventilation and a common crawlspace. However, Mr. Woellner “cleared” Olsen’s area with a single composite sample from the entire area.

**Violation of Section 7.1**

During the performance of a Preliminary Assessment or Clearance Assessment, the consultant is required to use the following standards:

**7.0 Cleanup standards.** The following cleanup standards shall be used to determine if a subject property has been adequately decontaminated. They may also be used during the preliminary assessment to demonstrate that a subject property, or portion of a subject property, is not contaminated. All subject properties must meet the cleanup standard for methamphetamine.



7.1 The methamphetamine concentration of any sample shall not exceed 0.5 µg /100 cm<sup>2</sup>, except as provided in Sections 7.1.1 and 7.1.2 below.

For this property, since Mr. Woellner failed to perform the mandatory sampling upon which the cleanup standards are based, Mr. Woellner cannot claim that any area within the structure was compliant.

Having said that, if we look for example at the sampling locations for Mr. Olsen’s area, we see that the samples were primarily collected from areas with the lowest expectation of contamination, and even at that, the levels were 0.43 µg/100 cm<sup>2</sup>. Based on previous comparisons, when a legitimate, trained industrial hygienist evaluates the same property as Mr. Woellner, the results of Mr. Woellner are typically about an order of magnitude below the actual levels (this is because Mr. Woellner knows how to collect a sample, but has no training on *where* or *why* to collect a sample).

Therefore, the probable contamination in Mr. Olsen’s Unit is about 4.0 µg/100cm<sup>2</sup>. Whether it actually is that level or not is unimportant since we can say with complete confidence that Mr. Woellner entirely failed to confirm that any area at 410 Garfield Avenue in Carbondale, CO 81623 was compliant during the Preliminary Assessment.

### Violation of Section 7.1.1

During the performance of a Preliminary Assessment or Clearance Assessment, the consultant is required to use the following standards:

7.1.1 Methamphetamine concentrations of samples taken from limited exposure areas shall not exceed 4 µg /100 cm<sup>2</sup>.

The calculation for concentration is the mass recovered by the laboratory integrated over the entire surface collected:

$$\text{Concentration} = \frac{\text{Mass recovered } \mu\text{g}}{\left(\frac{\text{Area sampled cm}^2}{100}\right)} = \mu\text{g}/100 \text{ cm}^2$$

For this property, we see that Mr. Woellner falsely claimed to have cleared the crawlspace and falsely claimed the sample result for the crawlspace was 4.0 µg/100cm<sup>2</sup>. However, that is not correct.

As already noted, only two of the four aliquots used to “clear” the crawlspace were actually collected from the crawlspace; the other two aliquots were collected from area on the main level.

-02a Central Closet – Door handle to Mr. Olson’s unit	February 24, 2015	<b>4.0 µg/100 cm<sup>2</sup></b>
-02b Crawl Space – Access hatch frame	February 24, 2015	4.0 µg/100 cm <sup>2</sup>
-02c Central Closet – Top of hot water heater	February 24, 2015	<b>4.0 µg/100 cm<sup>2</sup></b>
-02d Crawl Space – Footing (concrete slab)	February 24, 2015	4.0 µg/100 cm <sup>2</sup>



For that sample, the laboratory reported recovering 15.8 µg from the four part composite sample (see excerpt from the laboratory report below).

<i>Sample Label</i>	<i>Sample Area square centimeters</i>	<i>Methamphetamine</i>		<i>% Surrogate Recovery</i>
		<i>micrograms</i>	<i>ug/100 cm<sup>2</sup></i>	
150221508-01	400	1.73	0.43	108
150221508-02	400	15.8	4.0	105
150221508-03	400	6.40	1.6	105

Thus, the analytical sample result of 15.8 µg is from two 100 cm<sup>2</sup> areas from the crawlspace and two 100 cm<sup>2</sup> areas from the main level. Ignoring for a moment that his samples were invalid, Mr. Woellner reported that the main level area had a concentration of 0.43 µg/100cm<sup>2</sup> (Sample ID 150221508-01).

Therefore, each of the two aliquots that were unlawfully combined into the crawlspace composite contributed 0.4 µg to the crawlspace composite result.

When we subtract that mass from the total of 15.8 absolute µg to get the actual mass recovered from the two crawlspace aliquots we get 15 µg absolute. We then plug that mass back into the calculation for concentration for the crawlspace based on the two aliquots actually collected from the crawlspace:

$$\text{Concentration} = \frac{15 \mu\text{g}}{\left(\frac{200 \text{ cm}^2}{100}\right)} = 7.5 \mu\text{g}/100\text{cm}^2$$

And we see that the sample results for the crawlspace were not 4 µg/100cm<sup>2</sup> as falsely claimed by Mr. Woellner, but rather were almost two times over the regulatory limit for a crawlspace: 7.5 µg/100cm<sup>2</sup>. In fact, since only one of the aliquots was actually collected from the crawlspace, the concentration of the methamphetamine in the crawlspace is actually not less than 15 µg/100cm<sup>2</sup>.

Since Mr. Woellner has no concept of Industrial Hygiene and otherwise doesn't have a clue about any technical aspects of such sampling, he has no idea that the crawlspace was never compliant and he cleared the crawlspace anyway, in spite of the elevated contamination.

### ***Failure to Comply with Paragraph 7.2***

According to the regulations, the Consultant is required to perform specific tasks to clear a property. In his report, Mr. Woellner explicitly states he conducted clearance sampling. Therefore, pursuant to Section 7.2:

7.2 If there is evidence of iodine contamination on materials or surfaces that will not be removed, surface wipe samples for iodine shall not exceed a concentration of 22 µg/100 cm<sup>2</sup>.



As already described, Mr. Woellner failed to determine the availability of law enforcement documents, and otherwise failed to address the manufacturing process (which can be involved in a “one-pot” method). In his report, Mr. Woellner indicated his complete lack of understanding of drug laboratory assessments when he stated:

*QUEST aggressively inspected the home and saw no visible iodine-stained areas; spray starch was not used.*

We have already addressed this issue above and we have already addressed Mr. Woellner’s inability to identify iodine even when it is profoundly present. Therefore, it was otherwise impossible for Mr. Woellner to comply with Section 7.2 of the regulations when Mr. Woellner cleared Mr. Olsen’s Unit and the crawlspace.

### **Violation of Paragraph 7.3**

According to the regulations, the Consultant is required to perform specific tasks to clear a property.

7.3 If the preliminary assessment indicates the phenyl-2-propanone (P2P) method of methamphetamine manufacturing was used, surface wipe samples for lead shall not exceed a concentration of 40 µg /ft<sup>2</sup>, and vapor samples for mercury shall not exceed a concentration of 1.0 µg /m<sup>3</sup>.

As already described, Mr. Woellner failed to determine the manufacturing process and failed to determine the availability of law enforcement documents, and otherwise failed to address the presence of a P2P laboratory. Lacking any known training in illegal drug laboratories, there would be no expectation that Mr. Woellner would possess the necessary skills to identify a P2P laboratory, and it would otherwise be impossible for Mr. Woellner to comply with Section 7.3 of the regulations.

## **Colorado Criminal Code CRS 18-5-113. Criminal impersonation**

Mr. Woellner has repeatedly held himself out to be an Industrial Hygienist, while simultaneously claiming that he is not an Industrial Hygienist. As documented in this review (and in other historical documents referenced in this review) there is nothing in the present documentation that would indicate that Mr. Woellner is, in fact, an Industrial Hygienist meeting the State definition.

The incompetence demonstrated in the QUEST report should be sufficient to demonstrate that Mr. Woellner is not an Industrial Hygienist and is not competent to perform the work at hand and may be falsely representing himself as an Industrial Hygienist (interim authorization notwithstanding).

Colorado Case law defines criminal impersonation as knowingly assuming a false or fictitious identity or capacity, and in that identity or capacity, doing any act with intent to unlawfully gain a benefit or injure or defraud another (*People v. Brown, 193 Colo. 120, 562 P.2d 754 (1977); People v. Borrego, 738 P.2d 59 (Colo. App. 1987)*). To falsely



impersonate means to pretend to be a particular person without lawful authority (*People v. Horkans*, 109 Colo. 177, 123 P.2d 824 (1942)); and to perform an act in assumed character for benefit. It is an offense under the code to falsely impersonate another, and in such assumed character to do any act whereby any benefit might accrue to the offender or to another person. (*People v. Horkans*, 109 Colo. 177, 123 P.2d 824 (1942)). Venue is not an element of the crime of criminal impersonation (*People v. Perez*, 129 P.3d 1090 (Colo. App. 2005)). Although the code does not require two overt acts to be committed, (rather the code requires assuming a false identity and doing an act with the intent to gain a benefit (*People v. Johnson*, 30 P.3d 718 (Colo. App. 2000)), Mr. Woellner has repeatedly performed these acts. The requisite intent to gain a benefit may be inferred from the accused's knowing use of a false identity and the acknowledged intent to secure some advantage from the impersonation (*People v. Borrego*, 738 P.2d 59 (Colo. App. 1987)). The common meaning of "assumes a false or fictitious identity" is not to hold oneself out as someone that he or she is not; it requires the assumption of the identity of another person, whether that other person is real or fictitious (*People v. Jones*, 841 P.2d 372 (Colo. App. 1992)). For example, an attorney with a suspended license who continues to practice law is guilty of criminal impersonation for practicing law. The courts have held that "continuing to represent himself as an attorney and performing legal work when he was aware that he had no valid license to do so amounts to the assumption of a false or fictitious capacity for purposes of the criminal impersonation statute." (*People v. Bauer*, 80 P.3d 896 (Colo. App. 2003)).

## **Colorado Criminal Code – Fraud; Offering a false instrument for recording**

One of two mental states necessarily must have been present in the performance of the QUEST work at the subject property: 1) Either Mr. Woellner knew that the work he was performing was grossly incompetent and not in compliance with State Regulations (as demonstrated above) or, 2) Mr. Woellner was unaware of the fact that his work was deviating from mandatory State requirements.

However, since Mr. Woellner has specifically referenced 6 CCR 1014-3 and is explicitly recognized by Ms. Brisnehan (who is identified as sitting on the Board of Directors of CAMMP,<sup>14</sup> to which Mr. Woellner has claimed membership) as being proficient in such assessments. Since, to date, FACTs has identified over 2,000 regulatory violations associated with Mr. Woellner work, one must conclude that Mr. Woellner knowingly and willingly performed work that so grossly deviated from mandatory State requirements.

According to Colorado Revised Statute §18-5-114 (*Offering a false instrument for recording*), a person commits a class 5 felony when offering a false instrument for recording in the first degree if, knowing that a written instrument relating to or affecting real or personal property or directly affecting contractual relationships contains a material false statement or material false information, and with intent to defraud, he presents or offers it to a public office or a public employee, with the knowledge or belief that it will

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<sup>14</sup> Colorado Association of Meth and Mold Professions appears to be a group of pseudoprofessionals who otherwise have no apparent expertise in either methamphetamine or mold related issues.



be registered, filed, or recorded or become a part of the records of that public office or public employee.

Pursuant to State statute, and state regulations, the “Preliminary Assessment” must be filed with the State of Colorado (indeed the report we reviewed was obtained from the State of Colorado through the Colorado Open Records Act) Therefore, we believe the facts objectively establish that Mr. Woellner was aware of such recording and was aware of the false statements made therein.

## **Colorado Consumer Protection Act**

In Colorado, consumers are protected against deceptive trade practices as delineated in the Colorado Consumer Protection Act, CRS Title 6, Article 1. According to those statutes, a person engages in a deceptive trade practice when, in the course of such person's business or occupation, that person knowingly makes a false representation as to the certification of their services, and/or knowingly makes a false representation as to the characteristics of their services and/or represents their services are of a particular standard, quality, or grade if he knows or should know that they are not as specified.

According to the *Colorado Department Of Regulatory Agencies, Office Of Policy And Research, Industrial Hygienists, And Safety Professionals 2001 Sunrise Review* (October 15, 2001) Mr. M. Michael Cooke, Executive Director stated:

Another avenue of redress is the Colorado Consumer Protection Act. This law prohibits individuals from misrepresenting their certification, abilities, and associations, and making false or misleading statements concerning the price of goods, services, or property. In addition, §6-1-707(1)(a)(I), C.R.S., prohibits an individual from claiming “either orally or in writing, to possess either an academic degree or an honorary degree of the title associated with said degree, unless the person has, in fact, been awarded said degree.” While this Act does not prevent individuals from performing industrial hygiene work, it does prohibit individuals from claiming that they have education or background that they do not possess. An individual who misrepresents his or her qualifications may be in violation of this Act. 18 § 6-1-105(1)(b), (c), (e) and (l), C.R.S.

The State regulations were revised in 2014 to counter the serious problem created by fraudulent and incompetent consultants who were falsely claiming to be “Industrial Hygienists” and who were performing invalid assessments under the false presentation of being an “Industrial Hygienist.”

Forensic Applications Consulting Technologies, Inc. (the author of this review), helped the State Legislature write the statutory language that eventually became codified and required the Colorado Department of Public Health and Environment (CDPHE) to revise the regulations. Unfortunately, the task for the revision was given to the CDPHE regulator who, in violation of Colorado’s criminal statutes, had helped create the problem associated with fraudulent consultants performing assessments of methamphetamine affected properties.

The regulations required the CDPHE to restrict Interim Authorization (for the period of time between December 15, 2014 and June 15, 2015) for performing assessments under



the regulations exclusively to those consultants who were A) *bona fide* Industrial Hygienists, and B) had a history of performing valid assessments under the old regulations, which had been in effect since 2005. Instead, Ms. Coleen Brisnehan with the CDPHE gave *carte blanc* Interim Authorization to anyone who applied, including the fraudulent consultants who had created the serious problems in the first place. The problem was exacerbated by the fact that the consultant in question, Mr. Woellner, associates himself with a pseudo-professional commercial group called “Colorado Association of Meth and Mold Professionals” (CAMMP) which identifies Ms. Brisnehan as a Board Member of that group.<sup>15</sup>

Although Ms. Brisnehan granted her fellow CAMMP member automatic State Interim Authorization, Mr. Woellner has, in the recent past, denied that he is an Industrial Hygienist and has never been able to provide any documentation indicating that he has received any training in illegal drug laboratories or their assessment. As such, there is no expectations that the consultant would possess the necessary skills or knowledge to fulfill the regulatory requirements.

Finally, the consultant in question has never documented any training or experience that would permit him to identify himself as an Industrial Hygienist pursuant to State statutes CRS Statute §24-30-1402. In fact, until just very recently Mr. Woellner has never identified himself as an Industrial Hygienist and never claimed to be an Industrial Hygienist. In the past, Mr. Woellner has made several claims regarding his credentials and experience<sup>16</sup> that upon scrutiny, have been found to be unsupported.

## **CONCLUSION**

For this regulatory audit, FACTs has identified no fewer than 200 individual regulatory violations committed by Mr. Woellner in his Preliminary Assessment for the property located at 410 Garfield Avenue, Carbondale, CO 81623.

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<sup>15</sup> Ms. Brisnehan’s conflict of interest is prohibited under Colorado Revised Statutes §24-50-117 *Prohibited activities of employees*

<sup>16</sup> See for example, theFACTs regulatory audit for 11767 Grant Street, Northglenn, Colorado 80233



# **Appendix A**

## **Reviewer's Statement of Qualifications**





## Forensic Applications Consulting Technologies, Inc. Consultant Statement of Qualifications

FACTs project name:	Garfield	Form # ML15
December 3, 2015		

Caoimhín P. Connell, has been involved in clandestine drug lab investigations and assessments since 2002 and meets the Colorado Revised Statute §24-30-1402 definition of an "Industrial Hygienist." He has been a practicing Industrial Hygienist since 1987. Mr. Connell is a recognized authority in drug-lab operations and is a Certified Instructor in Meth-Lab Safety through the Colorado Regional Community Policing Institute, CRCPI (Colorado Division of Criminal Justice) and was the lead instructor for the CRCPI through the Colorado Division of Criminal Justice, providing over 260 hours of methlab training for over 45 Colorado Law Enforcement Agencies, federal agents, probation and parole officers throughout Colorado judicial districts. He has provided meth-lab lectures to the US Interagency Board, US Air Force, the National Safety Council, and the American Industrial Hygiene Association (of which he is a member and served on the Clandestine Drug Lab Work Group and for whom he conducted the May, 2010, Clandestine Drug Lab Course, and is a coauthor of the AIHA methlab assessment publication.)

Mr. Connell is a member of the American Conference of Governmental Industrial Hygienists, the Occupational Hygiene Society of Ireland, the Colorado Drug Investigators Association, an appointed Member of the National Fire Protection Association, and the ASTM International Forensic Sciences Committee, (where he was the sole sponsor of the draft ASTM E50 *Standard for the Assessment of Suspected Clandestine Drug Laboratories*).

From 2009, Mr. Connell served as the Industrial Hygiene Subject Matter Expert on the Federally funded Interagency Board (Health, Medical, and Responder Safety SubGroup), and was elected full member of the IAB-HMRS in 2011 where he now serves. He is the only private consulting Industrial Hygienist in Colorado 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 has received over 194 hours of highly specialized law-enforcement sensitive training in drug lab operation, and under supervision of the US DEA, he has manufactured methamphetamine using a variety of street methods. He has received highly specialized drug lab assessment training through the Iowa National Guard, Midwest Counterdrug Training Center and the Florida National Guard Multijurisdictional Counterdrug Task Force, St. Petersburg College, Rocky Mountain HIDTA, as well as through the US NHTSA, and the U.S. Bureau of Justice Assistance (US Dept. of Justice) and he is currently ARIDE Certified.

Mr. Connell is a current sworn law enforcement officer 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 607 assessments of illegal drug labs in CO, SD, NE, OK, and collected over 5,492 samples during assessments (a partial 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, and was an original team member on two of the legislative working-groups which wrote the original regulations for the State of Colorado and he was the primary author of Appendix A (*Sampling Methods And Procedures*) and Attachment to Appendix A (*Sampling Methods and Procedures Sampling Theory*) of the original Colorado regulations. Mr. Connell strongly objected to the unscientific, unfounded and inappropriate amendments now found in regulation.

Recommended by the US NIOSH as Peer Review Expert for the NIOSH 9109 Method, *Methamphetamine*, he has been admitted as a drug lab expert in Colorado, and an Industrial Hygiene Expert in Colorado in both civil and criminal courts as well as Federal Court in Pennsylvania. He has provided expert testimony in several criminal cases including Grand Jury testimony and testimony for US Bureau ATF and he 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 Investigators, and Federal Investigators, and provided testimony regarding criminal activities of staff members at the Colorado Department of Public Health Environment.



## Multijurisdictional Counterdrug Task Force Training

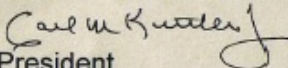


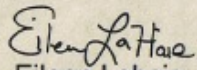
This is to certify that  
**Caoimhin P. Connell**

Has satisfactorily completed the following 24 hour MCTFT training course held at  
**DIVIDE, CO**

**Rural Patrol**

Training held 9/27/2004 through 9/29/2004

  
President  
St. Petersburg College

  
Eileen Lahaie  
MCTFT Director

A partnership between The Florida National Guard and St. Petersburg College

Midwest Counterdrug Training Center



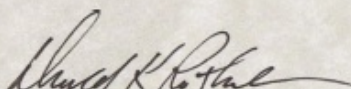
## Certificate of Training

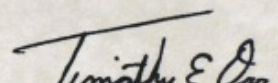
This certifies that

**Caoimhin Connell**

Has successfully completed the  
**Clandestine Laboratory Certification**

Cheyenne, WY  
40 Training Hours  
2-6 August 2004

  
Network Environmental Systems, Inc.

  
LTC Timothy E. Orr  
Commandant



# Center *for* Task Force Training™

THIS IS TO CERTIFY THAT

*Caoimhin P. Connell*

HAS SUCCESSFULLY COMPLETED 20 HOURS OF TRAINING IN

**METHAMPHETAMINE INVESTIGATION MANAGEMENT**

MARCH 20-22, 2006

DENVER, COLORADO

Domingo S. Herraiz  
Director, Bureau of Justice Assistance

Training coordinated by the  
Institute for Intergovernmental  
Research® on behalf of BJA



## State and Local Anti-Terrorism Training

THIS IS TO CERTIFY THAT

**Caoimhin P. Connell**

HAS SUCCESSFULLY COMPLETED AN 8-HOUR  
STATE AND LOCAL ANTI-TERRORISM TRAINING PROGRAM  
NARCOTICS TASK FORCE ANTI-TERRORISM BRIEFING

June 1, 2006

Denver, Colorado

Domingo S. Herraiz  
Director, Bureau of Justice Assistance



Training coordinated on behalf of BJA  
by the Institute for Intergovernmental Research

*Rocky Mountain  
High Intensity Drug Trafficking  
Area*



*Certifies that*



*Caoimhín Connell*

*has attended*

*4 hours of*

*Hash Oil Extraction: The Scene and The Patient*

*Aurora, CO*

*July 25, 2014*

*Training Manager, Rocky Mountain HIDTA*

*Director, Rocky Mountain HIDTA*



[www.nesglobal.net](http://www.nesglobal.net)

*Certificate of Completion*

*Caoimhin Connell*

*has successfully completed training in*

*Advanced Clan Labs: Beyond the Basics*

*presented by*

*NES, Inc.*

*1141 Sibley Street Folsom, CA 95630*

*Instructor - Brian Escamilla*

*04/28/14 04/30/14*

*Date*

*Contact Hours:24*

This certifies that

*Caoimhin P Connell*

Has met the requirements for the online course

*Expert Testimony Training for the Prosecutor and Scientist*



11-07-2012

Certificate Number: 1109778763

For more information please visit <http://www.rti.org/forensiced>



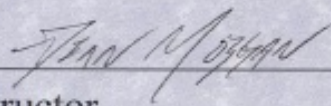
## Park County Sheriff's Office Certificate of Completion

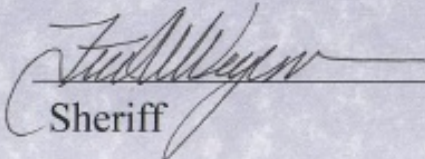
# Caoimhin Connell

has completed an 8 hour course in:

### Crime-scene Approach and Evidence Collection

Completed this 29th day of April, 2009

  
Instructor

  
Sheriff

***Rocky Mountain  
High Intensity Drug Trafficking  
Area***



*Certifies that*



**Caoimhín P. Connell**

*has attended  
2 hours of  
Hash Oil Explosions  
Woodland Park, CO  
May 31, 2014*

Training Manager, Rocky Mountain HIDTA

Director, Rocky Mountain HIDTA

***Certificate of Completion***

*This Will Certify That*

***Caoimhín P. Connell***

*Successfully Completed*

**Prescription Drug Crimes**

7 Hours Completed

At: CO Law Enforcement Officers Assn. On: September 30, 2010  
Greeley, Colorado



**P. Ritch Wagner**  
Instructor

Director, Law Enforcement Liaison & Education



# Certificate of Training

This is to certify that  
Caoimhin Connell

(Name)

Park County Sheriff's Office

(Agency)

If the bearer of this document possesses a 40 Hour certificate pursuant to 29 CFR §1910.120, this certifies the above named has met the refresher training requirements of 29 CFR §1910.120(e)(8) and is hereby **RECERTIFIED** in Clandestine Laboratory Safety / HazWoper

Sponsored by  
Rocky Mountain High Intensity Drug Trafficking Area  
Colorado Regional Community Policing Institute

Caoimhin P. Connell 4/12/10  
Caoimhin P. Connell, Instructor/Date  
Glean HARDEY



## Colorado Law Enforcement Officers' Association



This is to certify that

**CAOIMHIN CONNELL**

Completed **ARIDE (Advanced Roadside Impaired Driving Enforcement)**

hosted by **Loveland Police Department**

on **February 28 – March 1, 2011**

Tom Finelle  
Tom Finelle, CLEOA President

M. A. [Signature]  
ARIDE Instructor

# State of Colorado



THE BOARD ON PEACE OFFICER STANDARDS AND TRAINING  
HEREBY AWARDS THIS CERTIFICATE  
AS INSPECTOR OF VEHICLE IDENTIFICATION NUMBERS  
TO

**CAOIMHIN PADRAIG CONNELL**

**August 27, 2008**

Date

VIN INSP— **0952**

Number

*For fulfilling the prescribed requirements as an Inspector of Vehicle Identification Numbers and as a peace officer in Colorado, pursuant to Title 42, Article 5, Section 206 Colorado Revised Statutes.*

*Bill Ritter Jr.*

Governor

*John W. Suthers*

Attorney General, Board Chairperson

## Certificate of Completion Intoxilyzer 9000 Operator Certification Course

*The Evidential Breath Alcohol Testing Program of the  
Colorado Department of Public Health and Environment certifies that*

**Caoimhin P Connell**

User ID: **841645**

*has successfully completed the "Intoxilyzer 9000 Operator Certification Course"  
to determine the alcohol concentration in breath specimens pursuant to the  
State Board of Health Rules Pertaining to Testing for Alcohol and Other Drugs (5 CCR, 1005-2)  
Training was provided by the Evidential Breath Alcohol Testing Program  
of the Colorado Department of Public Health and Environment.*

**February 21, 2013**

Certificate Date

*Jeffrey A. Groff*

Jeffrey A. Groff, Program Manager  
Evidential Breath Alcohol Testing Program



*David A. Butcher*

David A. Butcher, Director  
Laboratory Services Division  
Colorado Department of Public Health  
and Environment

Certification expires 180 days from certificate date. Recertification must be per 5 CCR 1005-2.



# Certificate of Achievement

awarded to:

**Caoimhin P. Connell**

Has successfully completed Methamphetamine Lab Cleanup Management and Supervision training in accordance with 29 CFR 1910.120 and State Regulations Pertaining to the Cleanup of Methamphetamine Laboratories (8Hrs.)

June 1st, 2005

Date

Signed

HAZMAT Plans & Programs, Inc. 30 S. Havana St. Suite 304F Aurora, Colorado 80012 (303) 360-9801  
"Safety Plans, Programs and Training Tailored To The Needs Of Your Business"

## CERTIFICATE OF COMPLETION

COLORADO LAW ENFORCEMENT ASSOCIATIONS TRAINING PROJECT

*This Certifies That*

**Caoimhin Connell**

Has Attended the

**CLEAT 40-HOUR**

**Train the Trainer Course**

Hosted by Breckenridge Police Department  
August 14-18, 2006

Karen M. Renshaw, CAE  
Executive Director  
Colorado Association of Chiefs of Police



John L. Kammerzell  
Executive Director  
Police Officer Standard & Training



Donald E. Christensen  
Executive Director  
County Sheriffs of Colorado



COLORADO AUTO THEFT INVESTIGATORS



SINCE 1973

This is to certify that

**Caoimlin P. Connell**

Has completed a 24 hour training program in Vehicle Identification Number  
Inspection

Presented this 24th day of May, 2008

CATI President

VIN Inspector Training Coordinator

State of Colorado



THE BOARD ON PEACE OFFICER STANDARDS AND TRAINING  
AWARDS THIS CERTIFICATE  
TO

**CAOIMHIN PADRAIG CONNELL**

**May 6, 2004**

Date

B- 10670

Number

For fulfilling the prescribed requirements for certification. This certificate expires three years from date of  
issuance unless the certificate holder meets the requirements for continued certification as established by law  
and the P.O.S.T. Board.

Governor

Attorney General, Board Chairperson

**Rocky Mountain  
High Intensity Drug Trafficking  
Area**



*Certifies that*



**Caoimhín Connell**

*has attended*

*16 hours of*

**MCTC / RMHIDTA Indoor Marijuana Grows**

**Centennial, CO**

**August 28-29, 2014**

*Training Manager, Rocky Mountain HIDTA*

*Director, Rocky Mountain HIDTA*

**CERTIFICATE OF TRAINING**

THIS IS TO CERTIFY THAT

**Caoimhín Connell**

Has completed 4 hours of successful training for

The Hazards of Hash Oil Extraction

Held at IRIS Fire Investigations in Englewood, CO

on this 7<sup>th</sup> day of November, 2014

Robert K. Toth  
IRIS Fire Investigations, President



**COLORADO**  
Department of Public  
Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

December 30, 2014

Caoimhin Connell  
Forensic Applications Consulting Technologies Inc  
185 Bounty Hunter Ln  
Bailey, CO 80421

**Consultant Interim Authorization Approval**

Dear Caoimhin Connell:

The Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment (the Department) has reviewed the application for Consultant Interim Authorization and has determined the application to be complete and in compliance with 6 CCR 1014-3, Regulations Pertaining to the Cleanup of Methamphetamine-Affected Properties (the Regulations).

The Department approves the application for **Consultant Interim Authorization**. This interim authorization approval shall expire on June 15, 2015.

Assessment and sampling of methamphetamine-affected properties may only be conducted by Consultant Firms that have received interim authorization under Part 2, Section 3.2.4 of the Regulations. Therefore, this interim authorization may only be used to conduct assessment and sampling of methamphetamine-affected properties for a Consultant Firm that has received interim authorization approval from the Department.

Approved By: \_\_\_\_\_

Date: \_\_\_\_\_

12/30/2014





**COLORADO**  
Department of Public  
Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

December 30, 2014

Forensic Applications Consulting Technologies Inc  
185 Bounty Hunters Ln  
Bailey, CO80421

**Consultant Firm Interim Authorization Approval**

Dear Forensic Applications Consulting Technologies Inc:

The Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment (the Department) has reviewed the application for Consultant Firm Interim Authorization and has determined the application to be complete and in compliance with 6 CCR 1014-3, Regulations Pertaining to the Cleanup of Methamphetamine-Affected Properties (the Regulations).

The Department approves the application for **Consultant Firm Interim Authorization**. The firm shall only utilize individuals who have received interim authorization under Part 2, Section 3.2.1 of the Regulations to conduct assessment and sampling of methamphetamine-affected properties. This interim authorization approval shall expire on June 15, 2015.

The Regulations require submittal of electronic copies of reports to the Department. Electronic copies of reports should be submitted via email to [cdphe\\_methlabdocuments@state.co.us](mailto:cdphe_methlabdocuments@state.co.us). The words "report" or "report submittal" should be included in the email subject line, and the property address should be included in the body of the email.

Alternatively, compact disks with electronic copies of reports may be mailed to:

Colorado Department of Public Health and Environment  
Hazardous Material and Waste Management Division  
4300 Cherry Creek Drive South  
Denver, CO 80246-1530  
Attn: Colleen Brisnehan or Richard Mruz

Packages may also be hand delivered to the Department's mail room located in the northwest corner of Building B (700 South Ash Street).

Approved By: \_\_\_\_\_

Date: 12/30/2014

