



FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.

December 18, 2015

Colleen Brisnehan
Hazardous Waste Corrective Action Unit
Hazardous Waste Program
4300 Cherry Creek Drive S., Denver, CO 80246-1530

Via: email: ctbrisne@smtpgate.dphe.state.co.us, colleen.brisnehan@state.co.us

RE: 385 Regulatory Violations - Preliminary Assessment, 8172 East 132nd Avenue, Thornton CO

Dear Ms. Brisnehan:

Forensic Applications Consulting Technologies, Inc. (FACTs) has begun a series of regulatory audits of reports submitted to the Colorado Department of Public Health and Environment (CDPHE) pursuant to 6 CCR 1014-3 "*Regulations Pertaining To The Cleanup Of Methamphetamine-Affected Properties.*" FACTs performed a detailed regulatory audit for the report titled:

Robert A. Woellner (State Qualified Instructor)
Methamphetamine Preliminary Assessment Inspection
Residence at 8172 East 132nd Avenue in Thornton, Colorado 80602

The August 15, 2015, report contains truly astonishing examples of technical incompetency such as seen in the photograph below which demonstrates that the consultant entirely lacks any concept of environmental sampling, (or even the purpose of a template).



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

As you know, this particular untrained consultant until recently has stated that he is not an Industrial Hygienist, but has now recently been representing himself as an Industrial Hygienist performing the kind of “sampling” seen in the amazing photograph above and leaving a wake of victims in his path.

Mr. Robert Woellner, has an extensive history of regulatory violations, invalid drug laboratory assessments, falsification of information relating to real estate documents, and claims to his credentials that are unsupported.^{1,2,3,4,5,6,7,8,9,10,11} Thus far, since December 15, 2015, FACTs has identified no fewer than 2,394 (two *thousand*, three hundred and ninety four) regulatory violations of 6 CCR 1014-3 by this contractor; one *thousand* nine hundred and forty nine have been reported to your office as follows:

Victim’s Property Address	Date	Number of Violations
690 S. Lincoln Street, Denver, CO 80203	1/22/2015	769
11767 Grant Street, Northglenn, Colorado 80233	6/4/2015	113
413 South Buffalo Street, Yuma, Colorado 80759	2/26/2015	118
410 Garfield Avenue, Carbondale, CO 81623 (PA)	3/2/2015	198
410 Garfield Avenue, Carbondale, CO (Clearance)	4/20/2015	366
8172 East 132nd Avenue, Thornton, Colorado 80602	7/7/2015	385
Total Violations Reported to CDPHE	12/18/2015	1,949

Using a degree of scrutiny for reviews developed and deployed by your office, FACTs has thus far identified a total of eight *thousand*, and sixty (8,060) regulatory violations of 6 CCR 1014-3 from various State Certified Consultants (6,345 of which have been reported to you).

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

² 100 W. Spaulding Street, Lafayette, Colorado http://forensic-applications.com/meth/Spaulding_Regulatory_audit_Redacted.pdf

³ 4893 S Johnson Street, Denver http://www.forensic-applications.com/meth/Johnson_Critical_review.pdf

⁴ 788 W. Lois Ct., Louisville, CO 80027

⁵ 1138 West 32nd Street, Unit 201, Denver, CO

⁶ 48400 Routt County Road 56C, Steamboat Springs, CO 80487

⁷ 11767 Grant Street, Northglenn, Colorado 80233

⁸ 690 S. Lincoln Street, Denver, CO 80203

⁹ 8347 S Reed Street, Unit 2, Littleton CO 80128

¹⁰ March 2, 2015, Preliminary Assessment Inspection, 410 E 32nd Ave Avenue in Carbondale, CO 81623, March 2, 2015 (200 Violations)

¹¹ Clearance report for 410 E 32nd Ave Avenue in Carbondale, CO 81623 (366 Violations)

As you know, Section 3.1 of Part 3, of 6 CCR 1014-3 requires enforcement actions on the part of the CDPHE whenever the CDPHE has reason to believe that a person has violated any requirement of the regulations. In our detailed report, FACTs has discussed the following violations:

Regulatory Rubric	FACTs Page Number
Failure to Provide Qualified Personnel	4
Violation of Section 4.0	4
Failure to Comply with Section 4 (Failure to use PPE)	6
Failure to Comply with Section 4	6
Failure to Comply with 4.3.1	6
Attic 1 (7 Violations)	7
Attic 2 (7 violations)	7
Failure to Comply with 4.3.2	8
Crawl Space 1 (7 violations)	9
Crawl Space 2 (7 violations)	10
Failure to Comply with 4.4.2	10
Violation of Section 4.7	10
Failure to Comply with Section 4.9	11
Failure to Comply with Section 4.10	13
Violation of Paragraph 4.14	14
Violation of Paragraph 4.15	14
Violation of Paragraph 4.15.1 (5 Violations)	15
Violation of Paragraph 4.15.3 (20 Drawing Violations)	17
Violation of Paragraph 4.17	17
Violation of Paragraph 4.17.1 (5 Violations)	17
Violation of Paragraph 4.17.3 (5 Violations)	18
Violation of Paragraph 4.17.4	18
Violation of Paragraph 4.17.5 (2 Violations)	19
Violation of Section 6	20
Violation of Section 6.1.3	20
Violation of Section 6.1.3.3	20
Violation of Section 6.2 (71 violations)	21
Violation of Section 6.2.2 (31 Violations Failure to Delineate 100cm ²)	21
Violation of Paragraph 6.2.3 (17 Violations)	26
Violation of Paragraph 6.2.5	26
Violation of Paragraph 6.2.7, 6.2.9, 6.2.10 (68 Violations)	27
Violation of Paragraph 6.2.12.1	28
Violation of Paragraph 6.2.12.3	28
Violation of Paragraph 6.2.12.4	28
Violation of Paragraph 6.2.12.4	28
Violation of Paragraph 6.2.12.4 (3 Violations)	28
Violation of Paragraph 6.2.14	29
Violation of Paragraph 6.2.14.5 (15 violations)	29
Violation of Paragraph 6.2.14.6 (26 violations)	29
Violation of Paragraph 6.2.14.7 (26 violations)	29
Violation of Paragraph 6.2.14.9 (6 violations)	29
Violation of Paragraph 6.2.14.11	30
Violation of Paragraph 6.3.6 (31 violations)	30
Colorado Criminal Code CRS 18-5-113. Criminal impersonation	30
Colorado Criminal Code – Fraud; Offering a false instrument for recording	31
Colorado Consumer Protection Act	32

Naturally, we are concerned for the public safety of the innocent occupants, and the construction personnel, who may now be exposed to potentially toxic materials.

This communication is being sent to your office in good faith pursuant to pursuant to the provisions of C.R.S. 18-8-115 *Duty to report a crime - liability for disclosure*.

Kind regards,

A handwritten signature in black ink, appearing to read 'Caoimhín P. Connell', written in a cursive style.

Caoimhín P. Connell
Forensic Industrial Hygienist

CC: Daniel S. Miller, Senior Assistant Attorney General

CC: Howard Thigpen, Esq.