



**FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.**

November 23, 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](mailto:ctbrisne@smtpgate.dphe.state.co.us), [colleen.brisnehan@state.co.us](mailto:colleen.brisnehan@state.co.us)

RE: 118 Regulatory Violations at 413 South Buffalo Street, Yuma, Colorado 80759

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.*”

Thus far, FACTs has identified a total of five thousand eight hundred and fifty five (5,855) violations of 6 CCR 1014-3. 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.

FACTs performed a detailed review of a report prepared by a geologist, Mr. Robert Woellner, who, as you know, has a long history of invalid assessments and regulatory violations.<sup>1,2,3,4,5,6,7,8,9</sup>

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<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> 410 Garfield Avenue, Carbondale, CO 81623

<sup>7</sup> 48400 Routt County Road 56C, Steamboat Springs, CO 80487

<sup>8</sup> 8347 S Reed Street, Unit 2, Littleton CO 80128,

<sup>9</sup> 690 S. Lincoln Street in Denver, CO 80203

This review is for the report titled:

Robert Woellner  
Quality Environmental Services Technologies, Inc.  
413 South Buffalo Street, Yuma, Colorado 80759  
Methamphetamine Preliminary Assessment Inspection,  
Sampling & Recommended  
Scope of Work  
Luis Garcia  
6768 Colony Hills Lane  
Fort Collins, CO 80525  
February 26, 2015

As you are aware, Mr. Woellner has openly stated that he is not an Industrial Hygienist, and on November 19, 2009, during oral testimony,<sup>10</sup> while under oath, Mr. Woellner was unable to define “*Industrial Hygiene*.” FACTs has identified no fewer than 113 regulatory violations associated with the referenced work as follows:

- Violation of Section 4.2
- Violation of Section 4.3.1
- Violation of Section 4.3.1
- Violation of Section 4.5
- Violation of Section 4.6
- Violation of Section 4.7 (Two Violations)
- Violation of Section 4.14 (Eight Violations)
- Violation of Section 4.15 (Three violations)
- Violation of Section 4.15 (Five Violations)
- Violation of Section 4.17 (Five Violations)
- Violation of Section 4.17.4
- Violation of Section 6.2.2
- Violation of Section 6.2.2 Templates (20 violations)
- Violation of Section 6.2.3 (Four violations)
- Violation of Section 6.2.7 (20 Violations)
- Violation of Section 6.2.11
- Violation of Section 6.2.12
- Violation of Section 6.2.14
- Violation of Section 6.2.14.6 (6 Violations)
- Violation of Section 6.2.14.7 (6 Violations)
- Violation of Section 6.2.14.8 Sample Time (6 Violations)
- Violation of Section 6.2.14.8 Sample Date (6 Violations)
- Violation of Section 6.2.14.9 (6 Violations)
- Violation of Section 6.2.14.11 (6 Violations)
- Violation of Section 6.3.6
- Violation of Section 6.3.6 (Two Violations)
- Violation of Section 6.9.7
- Violation of Section 6.9.11.1
- Violation of Colorado Consumer Protection Act
- CRS §18-5-114 Offering a false instrument for recording

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<sup>10</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*.

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  
Howard Thigpen, Esq.



Appendix A  
Statement of Qualifications