



FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.

December 21, 2013

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XXXXXXXXXX
XXXXXXXXXX

Hello XX XXXXXXXX:

Thank you for the email last week regarding 1170 Garrison Street, in Lakewood.

At your request, we reviewed the July 24, 2013 Weecycle Environmental Consulting (WEC) report titled: Report for Clandestine Drug Lab Preliminary Assessment.

Although we didn't perform a thorough, detailed review, from our cursory review, we can conclude the following:

- State regulations mandate that such work must be performed by an Industrial Hygienist. Weecycle is not an Industrial Hygiene firm, and the author of the report is not an Industrial Hygienist. Any such work by Weecycle is automatically invalid.
- However, in any event, even if the work had been performed by an Industrial Hygienist, none of the samples collected by WEC at the subject property were collected in a manner that complies with mandatory state requirements.
- FACTs identified no fewer than 52 violations and/or omissions of 6 CCR 1014-3 in the WEC report. (If FACTs were to have performed a detailed review, we believe more violations would have been identified).
- None of the work performed by WEC was in compliance with mandatory regulations.
- The Weecycle work, as represented in their report, entirely failed to meet even the slightest mandatory provisions for a Preliminary Assessment of an Illegal Drug Laboratory and final verification sampling and mandatory documentation.
- The work by Weecycle was grossly incompetent, fraudulent and cannot be used for any regulatory purposes, and cannot be used as a declaration of compliance.
- The property was identified as an Illegal Drug Laboratory on January 12, 2009. As of today, December, 21, 2013, the property has never been brought into compliance, and each subsequent seller has been aware of the noncompliant status.

- No Preliminary Assessment has ever been completed for the property as required by 6 CCR 1014-3 and CRS §25-18.5 101 *et seq.*
- No cleaning or decontamination has ever occurred at the property as required by 6CCR 1014-3 and CRS §25-18.5 101 *et seq.* (As described in a previous review, dated May 9, 2009 for a potential buyer, the cleaning performed by a previous seller was illegal, and a fraudulent document had been issued to the Jefferson County Health Department.)
- No final verification sampling as required by 6 CCR 1014-3 and CRS §25-18.5 101 *et seq* has occurred at the property.
- Pursuant to CRS §25-18.5-104, entry into 1170 Garrison Street has been restricted since January, 2009 and that restriction continues to the date of this discussion.
- Based on the totality of circumstances and documentation, the property located at 1170 Garrison Street remains a noncompliant Illegal Drug Laboratory as that term is defined in CRS §25-18.5-101(8).
- FACTs identified at a minimum, the following violations and/or omissions of Colorado's Regulations and statutes including:

Violation of 6 CCR 1014-3 General Provisions: Failure to Provide Authorized Personnel

Fraudulent and Misleading Certifications

Failure to Comply With Mandatory Elements of a Preliminary Assessment

Failure to Comply With Paragraph 4.1

Violation of §4.1 Identification of Owner

Violation of §4.1 Size of Property

Violation of §4.1 Adjacent Property

Failure to Comply With Paragraph 4.2

Failure to Comply With Paragraph 4.3

Failure to Comply With Paragraph 4.4

Failure to Comply With Paragraph 4.5

Failure to Comply With Paragraph 4.6

Failure to Comply With Paragraph 4.7

Failure to Comply With Paragraph 4.8

Failure to Comply With Paragraph 4.9

Failure to Comply With Paragraph 4.10

Failure to Comply With Paragraph 4.11

Failure to Comply With Paragraph 4.14

Failure to Comply With Section 6.0

Failure to Comply With Section 6.0.3 Insufficient Samples Collected

Failure to Comply With Paragraph 6.1.1

Violation of Section 6.2.1 Prohibited Sampling Technique - Composite

Violation of Section 6.2.1 Prohibited Sampling Technique – Mixed matrices

Violation of Appendix A: Prohibited Surfaces



Violation of Appendix A: Mandatory Sampling Theory
Violation of Appendix A: Blank Submittal
Violation of 6.1.2 Failure to Address Ventilation System
Failure to Comply With Section 8
Failure to Comply With Paragraph 8.1
Failure to Comply With Paragraph 8.2
Failure to Comply With Paragraph 8.3
Failure to Comply With Paragraph 8.4
Failure to Comply With Paragraph 8.5
Failure to Comply With Paragraph 8.6
Failure to Comply With Paragraph 8.7
Failure to Comply With Paragraph 8.8
Failure to Comply With Paragraph 8.9
Failure to Comply With Paragraph 8.13
Failure to Comply With Paragraph 8.14
Failure to Comply With Paragraph 8.15
Failure to Comply With Paragraph 8.16
Failure to Comply With Paragraph 8.17
Failure to Comply With Paragraph 8.18
Failure to Comply With Paragraph 8.19
Failure to Comply With Paragraph 8.20
Failure to Comply With Paragraph 8.21
Failure to Comply With Paragraph 8.22
Failure to Comply With Paragraph 8.23
Falsification of analytical data certification
Colorado Criminal Code – Fraud; Offering a false instrument for recording
Colorado Criminal Code CRS 18-5-113. Criminal impersonation

During this cursory review, we ignored the many, many smaller errors found in the WEC report, such as the statement:

Field blanks are under the contamination limit according to the CDPHE.

(CDPHE does not have any contamination limits for field blanks.)



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Violation of 6 CCR 1014-3 General Provisions Failure to Provide Authorized Personnel

One of the mandatory provisions, pursuant to state regulations promulgated by the Colorado State Board of Health and designated as “6 CCR 1014-3, *Regulations Pertaining To The Cleanup Of Methamphetamine Laboratories*” states that assessments of properties within the scope of the regulation can only be performed by an Industrial Hygienists meeting the definition of Section 24-30-1402 of the Colorado Revised Statutes.

Over the last several years, a serious problem has been created by fraudulent consultants (such as WEC) and incompetent Industrial Hygienists, who have been performing invalid assessments in illegal drug laboratories. Since local governments were not receiving support in compliance, many local jurisdictions did not enforce any aspect of the regulations.

As a result of the serious problems created by unauthorized and incompetent consultants, Senator Lois Tochtrop introduced senate bill SB13-219 which, among other changes, would impose heavy fines on incompetent Industrial Hygienists and fraudulent consultants. The Act was signed by the Governor of Colorado on May 28, 2013 and most of the provisions of the bill became effective on August 7, 2013. However, the regulatory certification of qualified consultants will not be finalized until approximately March of 2014. Therefore, several fraudulent and unauthorized individuals continue to perform invalid assessments with impunity.

Certified Mould Inspectors

For this property, on the cover of the report, WEC does not even pretend the author is an “Industrial Hygienist” and instead identifies the author as “Judith E Sawitsky, CMC”

The designation “CMC” is a make-believe “certification” that is not recognized as carrying weight or validity in the legitimate field of microbiology or Industrial Hygiene. The term “CMC” usually indicates some kind of “certified” mould inspector and often means “Certified Mould Contractor” or “Certified Microbial Contractor,” or other meaningless “certification” in mould related issues.

Colorado, like virtually every other State, does not recognize the credentials of a “certified mould inspector” since there is no State Regulatory Board which oversees such “certification.” This “certification” does not carry any indication of proficiency in any field of practice. Typically, “certified” mould inspectors are self-“certified” and generally lack any legitimate training in indoor moulds or in any science related field.

None of the various “certifications” used by Weecycle in their report, are recognized in Colorado; essentially a child of 12 years old could sit down at their computer and print out a “certificate” identifying themselves as a “CMC” or claim there are a “Certified Meth Lab Decontaminator” and run around collecting samples - however that does not make them an Industrial Hygienist, and such a person will not meet the statutory definition of an Industrial Hygienist and none of their assessments in illegal drug laboratories will be valid in the state of Colorado.



In fact, similar to most “certified” mould inspectors Ms. Sawitsky is not even knowledgeable in indoor moulds, but rather practices fear-based, junk science, pretending to perform Industrial Hygiene work. FACTs has been involved in reviewing other reports from WEC involving indoor mould issues wherein WEC cooperated with a “toxic mould” remediation contractor and relied on junk-science, and nonsensical sampling to frighten an homeowner into expensive, fear-based “mould remediation.” (See for example: <http://www.forensic-applications.com/moulds/elizcensorecritical.pdf>). As demonstrated in that report, WEC clearly has no legitimate experience or training in indoor moulds, basic science, air monitoring protocols or Industrial Hygiene.

CRS Title 24 Article 30 – Industrial Hygienist

In their report, WEC claims their field technician was an Industrial Hygienist by virtue of having “...*AT LEAST 5 years of experience in Industrial Hygiene prior to the July 1, 1997 date as set out in DEFINITION II.*”

However, there is no such provision in Colorado State statutes under which an individual may claim to be an Industrial Hygienist. The Colorado Revised Statutes actually require something completely different than the provision claimed by WEC; the statutes actually read:

CRS 24-30-1402 (c)(2)(II) Any individual who has practiced within the scope of the meaning of industrial hygiene for a period of not less than five years immediately prior to July 1, 1997, is exempt from the degree requirements set forth in this subsection (2.2).

As it is, according to the WEC report, in the five years prior to July 1, 1997, the WEC technician was not practicing as an Industrial Hygienist, but rather WEC describes their technician’s experience as working at “...*an environmental consulting firm located in Denver, CO as an intern and then as an Environmental Biotechnologist staff member from 1990 through 1994.*” Being an “intern” with an environmental firm is not practicing Industrial Hygiene and there is no definition of an “Environmental Biotechnologist” and, therefore, a janitor at a school legitimately can claim to be an “Environmental Biotechnologist.”

According to Colorado statutes:

24-30-1402. Definitions.

(2.2) "Industrial hygienist" means an individual who has obtained a baccalaureate or graduate degree in industrial hygiene, biology, chemistry, engineering, physics, or a closely related physical or biological science from an accredited college or university. The special studies and training of such individual shall be sufficient in the cognate sciences to provide the ability and competency to:

- (a) Anticipate and recognize the environmental factors and stresses associated with work and work operations and to understand their effects on individuals and their well-being;
- (b) Evaluate on the basis of training and experience and with the aid of quantitative measurement techniques the magnitude of such environmental factors and stresses in terms of their ability to impair human health and well-being;
- (c) (I) Prescribe methods to prevent, eliminate, control, or reduce such factors and stresses and their effects.



I was the legislative technical advisor for promulgation of CRS 24-30-1402, and crafted some of the legislative language. The intent of the legislation was to recognize those Industrial Hygienists who were already practicing Industrial Hygiene for five years prior to July 1, 1997. WEC has not provided any documentation indicating that Ms. Sawitsky was a practicing Industrial Hygienist five years prior to July 1, 1997.

AIHA Industrial Hygienist Core Capabilities

In 2012, the American Industrial Hygiene Association,¹ in conjunction with the American Conference of Governmental Industrial Hygienists,² and the American Board of Industrial Hygiene, published a document called “Core Competencies for the Practice of Industrial /Occupational Hygiene” The document identified those core competencies as:

- Air Sampling and Instrumental analysis
- Basic Science
- Biohazards
- Biostatistics and Epidemiology
- Chemical Hazards
- Community Exposures
- Engineering Control and ventilation
- Ergonomics
- Health Risk Analysis and Hazard Communication
- Ionizing radiation
- Management
- Noise and Hearing loss prevention
- Non engineering controls
- Non ionizing radiation
- Thermal stressors
- Toxicology
- Work Environments and Industrial Processes

There is no documentation that would suggest that the WEC field technician, Ms. Sawitsky has any training or experience or knowledge in ANY of the above listed core capabilities. Furthermore, previous work by WEC clearly demonstrates gross incompetence in several of these areas, such as toxicology, biohazards and air sampling.

A part-time FACTs field Technician, is a supervisor at a heavy industry steel manufacturing facility. Some time ago (mid November 2013,) FACTs asked our technician to contact WEC, and identifying himself and identify his role in heavy industry and to inform WEC he was asked to contact WEC regarding their capabilities to provide Industrial Hygiene services. Specifically, our technician was asked to inquire as to the capabilities of WEC to perform the following Industrial Hygiene services:

¹ I am a member of the AIHA and currently sit on the Clandestine Drug Laboratory Working Group

² Of which I am a member
Garrison Street Cursory Review



Air Sampling and Instrumental analysis
Biohazards
Chemical Hazards
Engineering Control and ventilation
Ergonomics
Health Risk Analysis and Haz Comm
Ionizing radiation
Noise and Hearing loss prevention
Non ionizing radiation
Toxicology
Work Environments and Industrial Processes

Our technician was informed by WEC, that they were not able of providing ANY of the above listed services. Therefore, out of the 17 core capabilities that constitute Industrial Hygiene, WEC was incapable of providing at least 11 of those services.

TIG and Arc Welding Operations

Specifically, WEC was asked about their capabilities to provide air monitoring exposures assessment for TIG and stick arc welding operations which incorporates the following industrial Hygiene aspects:

Air Sampling and Instrumental analysis
Chemical Hazards
Health Risk Analysis and Haz Comm
Ionizing radiation
Non ionizing radiation
Toxicology
Work Environments and Industrial Processes

WEC informed us they were not able to perform this basic Industrial Hygiene function.

Biohazards

Specifically, WEC was asked about their capabilities to provide an assessment of biohazards related with the Mycobacteria associated with metal cutting fluids which incorporates the following industrial Hygiene aspects:

Air Sampling and Instrumental analysis
Basic Science
Biohazards
Engineering Control and ventilation
Health Risk Analysis and Haz Comm
Non engineering controls
Toxicology
Work Environments and Industrial Processes

WEC informed us they were not able to perform this basic Industrial Hygiene function.



Ergonomics

Specifically, WEC was asked about their capabilities to provide an ergonomic assessment for grinders and buffers which incorporates the following industrial Hygiene aspects:

- Basic Science
- Biohazards
- Ergonomics
- Health Risk Analysis and Haz Comm
- Non engineering controls
- Work Environments and Industrial Processes

WEC informed us they were not able to perform this basic Industrial Hygiene function.

Industrial Ventilation

Specifically, WEC was asked about their capabilities to provide design criteria for industrial ventilation which incorporates the following industrial Hygiene aspects:

- Basic Science
- Chemical Hazards
- Community Exposures
- Engineering Control and ventilation
- Health Risk Analysis and Haz Comm
- Management
- Noise and Hearing loss prevention
- Work Environments and Industrial Processes

WEC informed us they were not able to perform this basic Industrial Hygiene function.

Noise and Hearing Loss Prevention

Specifically, WEC was asked about their capabilities to provide sound and noise monitoring services for a factory floor wherein steel fabrication occurs, which incorporates the following industrial Hygiene aspects:

- Basic Science
- Engineering Control and ventilation
- Health Risk Analysis and Haz Comm
- Noise and Hearing loss prevention
- Non engineering controls
- Work Environments and Industrial Processes

WEC informed us they were not able to perform this basic Industrial Hygiene function.

Ionizing radiation

Specifically, WEC was asked about their capabilities to provide ionizing radiation assessments for sealed source devices, which incorporates the following industrial hygiene aspects:



Basic Science
Community Exposures
Engineering Control and ventilation
Health Risk Analysis and Haz Comm
Ionizing radiation
Management
Non engineering controls
Work Environments and Industrial Processes

WEC informed us they were not able to perform this basic Industrial Hygiene function.

WEC, which is not an Industrial Hygiene firm, was not able to provide any of the above, basic Industrial Hygiene services since WEC is not an Industrial Hygiene firm and apparently does not employ any Industrial Hygienists.

There is no documentation suggesting that the WEC field technician, Ms. Sawitsky has any special training or studies in the core cognate sciences that constitute Industrial Hygiene, or that speak to the ability and competency to anticipate and recognize the environmental factors and stresses associated with work and work operations and to understand their effects on individuals and their well-being. In fact, as already referenced, in the document found at <http://www.forensic-applications.com/moulds/elizcensoredcritical.pdf> FACTs demonstrated that WEC entirely rejects known air sampling and instrumental analysis techniques, and rejects basic science in evaluating biohazards, and rejects basic science of toxicology and rejects basic science in biostatistics and rejects the science of biohazards and therefore, rejects basic science.

Furthermore, there is no indication that Ms. Sawitsky has any knowledge of the assessment of illegal drug laboratories, and there is no documentation in the WEC report that would indicate that Ms. Sawitsky has any experience or training that would equip her to perform an assessment of an illegal drug laboratory.

6 CCR 1014-3 Language on Training

Not only do the State regulations and pertinent standards mandate the use of an Industrial Hygienist for an identified illegal drug laboratory, the regulations repeatedly allude to the necessity of that IH being trained and knowledgeable in clandestine drug laboratory operations and contamination.

For example, regarding pre-remediation assessments wherein the hypothesis of compliance is tested, the regulations explicitly state:



6CCR 1014-3
Attachment to Appendix A
Methamphetamine Laboratories Sampling Methods and Procedures
Sampling Theory

...The strength of evidence needed to reject the hypothesis is low, and is only that which would lead a reasonable person, **trained in aspects of methamphetamine laboratories**, to conclude the presence of methamphetamine, its precursors as related to processing, or waste products.

And:

Other outdoor surfaces should be evaluated based on **best professional judgment**.
Wipe samples and destructive samples may be required.

And:

Composite sampling is permitted by this regulation, as described herein. The consultant may not use composite sampling unless in their **professional judgment**, contamination is expected to be relatively evenly dispersed throughout a given area, such that the sampling will accurately represent the conditions of the drug laboratory.

Similarly, regarding contamination migration, the regulations explicitly state:

6 CCR 1014-3 Section 3.0: “Functional space” means a space where the spread of contamination may be expected to occur relatively homogeneously, compared to other functional spaces. The “functional space” may be a single room or a group of rooms, designated by a consultant who, **based on professional judgment**, considers the space to be separate from adjoining areas with respect to contaminant migration. Other typical examples of functional spaces include a crawl space, an attic, and the space between a dropped ceiling and the floor or roof deck above.

And:

6 CCR 1014-3 §4.6 Identification and documentation of areas of contamination. This identification may be based on visual observation, law enforcement reports, proximity to chemical storage areas, waste disposal areas, or cooking areas, or **based on professional judgment** of the consultant; or the consultant may determine that assessment sampling is necessary to verify the presence or absence of contamination.

The allusion to an appropriately trained IH is woven intrinsically into the State’s regulation’s application of “professional judgment” and is needed for compliance. If an individual has never received any kind of legitimate training in the manufacturing of illegal drugs, it would be impossible for that individual to apply “professional judgment” during the assessment. If an individual has never received any kind of training in the assessment of illegal drug laboratories, how could that individual possible exercise “professional judgment”?

Fraudulent and Misleading Certifications

Colorado Methlab Certification

In the past, WEC has explicitly claimed to be Certified by the State of Colorado to perform illegal drug laboratory assessment work. Presently, there is NO such certification in Colorado, and there has never been any such certification in Colorado.



As of November 9, 2013, on their website, WEC made the patently fraudulent claim that they are explicitly **certified** in the State of Colorado for performing testing in clandestine drug laboratories. On their web site, WEC falsely claims:



Figure 1
Language from the Weecycle Internet Site³

Weecycle, Inc. is not now and has never been certified in the State of Colorado or by the State of Colorado to perform clandestine lab testing for methamphetamine contamination; the claim is fraudulent and as a result of that fraudulent claim, the Registered Owner of the subject property believed WEC was in fact certified by the State of Colorado to perform the work.

Mysterious State of Colorado Consultant Registration

In their report, WEC also claims they hold

State of Colorado Consultant Registration, Reg. #5417

FACTs is entirely unaware of this “registration” or how it may be alluding to this project. FACTs searched the Official State of Colorado Registry and found there is only exclusively one listing for “Judith Sawitsky” who is exclusively certified to collect asbestos air samples. We could find no reference to a Consultant Registration or Consultant Registration Number 5417.

Meth Lab Clean-up Company

On the WEC internet page, they claim to have a certification in “Clandestine Drug Lab Decontamination Training” and they falsely claim they are certified for performing clandestine drug laboratory assessments in Colorado.

WEC claims the certification is from a meth-lab cleanup company who is known for multiple violations of State regulations.⁴

³ Copyright Weecycle 2013, used here without permission under the “fair use” doctrine as described in US Code, Title 17 Section 107 “criticism,” “teaching,” “reporting,” and “scholarship.”

⁴ See for example http://forensic-applications.com/meth/Critical_review_Race.pdf
Garrison Street Cursory Review



Montana Cleaning License

We have seen other reports where WEC claims to be a Montana Certified Methamphetamine Cleanup Supervisor (MCP11-0039-S) – On November 9, 2013, FACTs went to the following internet page:

<http://www.deq.mt.gov/Meth/MethContractors.mcp>



Figure 2
Language from the State of Montana Internet Site

Nowhere in the roster of Certified Meth Lab Cleanup Contractors does the State of Montana recognize or list the name of “Sawitsky” (or Judith or Judy) and nowhere on that roster do they list WEC as being certified in any way whatsoever.

Violation of §8.21

Specific mandatory information is required to be included in the final verification documentation for the assessment of a clandestine drug laboratory. Many elements of that final documentation must be included in the initial Preliminary Assessment, or it will not be available for inclusion in the final documentation. One of the items that must be included in the Preliminary Assessment for subsequent inclusion in the final documentation is:

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

The WEC documentation entirely failed to identify what training or capabilities the WEC technician has in the assessment of illegal drug laboratories or why she thinks she is an Industrial Hygienist. The WEC report merely states:

...industry specific training in conducting methamphetamine assessments.



There are no certifications presented in the documentation, no references to any training courses, nor an allusion as to whom performed the training, or when or where. Based on the profound incompetence exhibited and previously demonstrated fraud by WEC, Ms. Sawitsky, does not possess any of the skills necessary to perform the work.

As an example of what a legitimate SOQ looks like, I have appended my SOQ to this discussion.

Failure to Comply With Mandatory Elements of a Preliminary Assessment

According to Colorado State regulation 6 CCR 1014-3, when a Preliminary Assessment is conducted:

6 CCR 1014-3 4.0 Preliminary Assessment. A preliminary assessment shall be conducted by the consultant, in accordance with section 6.7 of this regulation, prior to the commencement of property decontamination. ... Information collected during the preliminary assessment shall include, but not be limited to, the following:

Failure to Comply With Paragraph 4.1

According to State regulations, the Preliminary Assessment shall include a property description containing specific elements.

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

Violation of §4.1 Identification of Owner

WEC failed to perform this regulatory duty by failing to comply with this requirement. Nowhere within the documentation do we see where WEC has identified the registered owner of the property.

Violation of §4.1 Property Size

WEC failed to perform its regulatory and professional duty by failing to comply with this requirement. Nowhere within the documentation do we see where WEC has provided an accurate description of the size of the structures included. WEC erroneously identified the entire structure as 1,392 ft², ignoring the size of the garage and the out buildings that must, by regulation be included in the assessment. The actual regulatory size of the property is 2,799 square feet and not 1,392 square feet. As described later, this significantly impacts the final verification sampling requirements.

Violation of §4.1 Adjacent Property

WEC failed to perform its regulatory and professional duty by failing to comply with this requirement. Nowhere within the documentation do we see where WEC has provided a description of adjacent and/or surrounding buildings. In their report, WEC merely notes:

There are similar residential properties surrounding the subject site.



This “description” is exactly the same as that WEC uses in all reports reviewed by FACTs regardless of the actual site conditions and fails to note that the subject property is in fact, agricultural, and failed to identify the numbers and types of structures on the site.

It appears that WEC merely issues “boiler-plate” reports for all their projects without considering actual site conditions. We have even seen WEC use this same language when the property was a condominium in a superstructure.

Failure to Comply With Paragraph 4.2

According to State regulations, during the Preliminary Assessment, the Industrial Hygienist shall perform specific duties regarding law enforcement documentation:

4.2 Review of available law enforcement reports that provide information regarding the manufacturing method, chemicals present, cooking areas, chemical storage areas, and observed areas of contamination or waste disposal.

WEC failed to perform its duties and fulfill regulatory requirements by failing to determine if law enforcement documents were available.

In its report, WEC merely stated:

Documentation from law enforcement related to methamphetamine activity at this property was not available.

The Industrial Hygienist is required by regulation to determine if law enforcement documents are available and what information law enforcement personnel have for the property.

There is no evidence in their report, that WEC made any attempt to contact any law enforcement office or obtain any law enforcement documents associated with the property as required by regulations. WEC had the regulatory duty to attempt to identify and, if available, review, and provide the mandatory documentation in its report.

Nowhere in the WEC report does WEC document any attempts to comply with State regulations and apparently made no attempt to obtain or review any law enforcement documents as required by regulation.

Failure to Comply With Paragraph 4.3

According to State regulations, during the Preliminary Assessment, the Industrial Hygienist shall perform specific duties that determine the potential for contamination migration, establish the grounds for decontamination and prepare the foundation for post clearance sampling by determining functional spaces. The Regulations explicitly require the Industrial Hygienist to include:

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



WEC failed to perform its duties and fulfill regulatory requirements by failing to identify functional spaces within the subject property that may be associated with unique contamination, as required by regulation. Pursuant to this section of the regulations, the Industrial Hygienist is required to consider:

“Functional space” means a space where the spread of contamination may be expected to occur relatively homogeneously, compared to other functional spaces. The “functional space” may be a single room or a group of rooms, designated by a consultant who, based on professional judgment, considers the space to be separate from adjoining areas with respect to contaminant migration. Other typical examples of functional spaces include a crawl space, an attic, and the space between a dropped ceiling and the floor or roof deck above.

In their report, WEC even acknowledges they were supposed to include the crawlspace in their assessment:

WEC’s preliminary assessment included the following items from the METHAMPHETAMINE PRELIMINARY ASSESSMENT CHECKLIST:

- *Identification of structural features that may indicate separate functional spaces, such as attics, false ceiling and **crawl spaces**, basement, closets, and cabinets.*

However, in spite of their claim they assessed the crawlspace, NOWHERE in their report do they even mention the crawlspace as required by regulation and WEC failed to perform their regulatory obligation by failing to include the crawlspace in their assessment.

WEC demonstrates a lack of understanding of this requirement by identifying specific groups of rooms as a single functional space – for example:

Functional Space B: Bedrooms 1 & 2, Hallway, and Bathroom

A legitimate Industrial Hygienist, trained in the aspects of the assessment of illegal drug laboratories, would know that each of these rooms is a separate Functional Space.

Due to WEC’s lack of understanding of Industrial Hygiene and the regulations and no documentable training or experience in legitimate assessment of illegal drug laboratories, WEC erroneously identified five Functional Spaces. Based on our memory of the property, there were actually *at least* the following 13 Functional Spaces:

- 1) Crawlspace
- 2) Attic
- 3) SW Bedroom
- 4) SE Bedroom
- 5) Bathroom
- 6) Bedroom hallway
- 7) Living room
- 8) Kitchen
- 9) Garage
- 10) Recreation Den
- 11) Covered porch
- 12) Barn
- 13) Dining Room



It is possible there are more, for example, it is possible there are actually two attics. Until a legitimate Preliminary Assessment is performed pursuant to 6 CCR 1014-3, this remains unknown.

By these inclusions and omissions, WEC exhibits a gross lack of understanding of not only the concepts involved, but the actual regulatory requirements.

Failure to Comply With Paragraph 4.4

According to State regulations, during the Preliminary Assessment, the Industrial Hygienist shall identify the methamphetamine manufacturing process used on site. The information is imperative and indispensable during the Preliminary Assessment, since the decontamination efforts may be incumbent on the type of process used. Furthermore, the post decontamination sampling shall be incumbent on the type of process used. The state regulations explicitly require the Industrial Hygienist to:

4.4. Identification of manufacturing methods based on observations and law enforcement reports.

Inherent in this requirement is the presumption that the consultant would be capable of actually having some knowledge of manufacturing processes, and some training which would allow the recognition of observations to be linked to some kinds of manufacturing.

As already stated, there is no documentation which indicates that the work was performed by an Industrial Hygienist, or any person with any training or knowledge of illegal drug laboratories but rather, the work was performed by a “certified microbial consultant” with no documentable training in clandestine drug operations. Therefore, it would be impossible for Mr. Sawitsky to be capable of describing the method of manufacturing or chemicals used, especially since, in violation of regulations, WEC failed to contact law enforcement agencies for information regarding the subject property.

In their own report, WEC acknowledges they were suppose to perform this function and they false claim they did perform this function. In their report, they state:

WEC's preliminary assessment included the following items from the METHAMPHETAMINE PRELIMINARY ASSESSMENT CHECKLIST:

- Review of Law enforcement reports, if any or available, that provide information regarding the manufacturing method, chemicals present, cooking areas, chemical storage areas, and observed areas of contamination or waste disposal.

But then, in contradiction to their own earlier statement, WEC then address manufacturing by merely stating :

Manufacturing methods were not specifically identified.

This is simply what WEC seems to state for all such projects regardless of the actual site conditions. It becomes obvious, based on the available information, that WEC would be entirely incapable of being able to identify the type of manufacturing and that they make no attempt to discern the situation and other lack the technical ability to perform the work.



WEC does not explain why they did not comply with the regulations that state the Industrial Hygienist **shall** provide:

4.4. Identification of manufacturing methods based on observations and law enforcement reports.

Since WEC failed to attempt to obtain law enforcement records as required, WEC could not have complied with this provision. Similarly, since WEC has no documented knowledge or training of manufacturing processes and WEC has otherwise demonstrated gross technical incompetency in clandestine drug lab assessments, there is no reason to expect WEC to have sufficient competency in recognizing, or knowing the significance of any such observations to discern which method(s) may have been involved.

State Regulations explicitly require the following:

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 /ft², and vapor samples for mercury shall not exceed a concentration of 1.0 µg /m³.

Therefore, since WEC has not determined why the contamination is present, or the type of process that may have been used, their “sampling” for final verification cannot be supported by their faulty Preliminary Assessment. WEC entirely failed to perform its regulatory duties, and entirely failed to grasp the importance of this determination and WEC states:

Visual inspection revealed etching and residue on the walls that are typically associated with clandestine drug manufacturing.

Again, this is exactly the same boiler plate language we have seen in other WEC reports, regardless of actual site conditions. Since WEC has no documentable knowledge of illegal drug laboratories and is not an Industrial Hygiene firm and is therefore not authorized to even perform the work, it appears that WEC just plugs in the same language regardless of actual site situations. If WEC was capable of identifying etching and residue “typically associated with drug manufacturing,” then presumably WEC would have known that different manufacturing methods result in different kinds of etching and staining – why then did WEC ignore the regulations and fail to identify the method? Why, as described elsewhere in this report did WEC fail to comply with the regulations and fail to photograph those areas?

It is difficult to understand how the property could be contaminated with methamphetamine, yet, WEC cannot make a representation as to whether or not the property was, at some time, the site of clandestine drug activity.

Failure to Comply With Paragraph 4.5

According to State Regulations, during the Preliminary Assessment, the Industrial Hygienist is required to perform specific duties including:



4.5. Identification of chemicals used, based on observations, law enforcement reports, and knowledge of manufacturing method(s).

WEC entirely failed to perform its professional, regulatory duties by failing to obtain law enforcement documents, and failing to determine what chemicals may have been used or stored on the subject property. Since WEC failed to attempt to obtain law enforcement records as required, WEC could not have complied with this provision.

In their report, WEC merely states:

Chemicals were not found on the property.

And yet, the previous reports available to WEC addressed these issues, and WEC has ignored that information.

Failure to Comply With Paragraph 4.6

According to State Regulations, during the Preliminary Assessment, the Industrial Hygienist is required to perform specific duties including:

4.6 Identification and documentation of areas of contamination. This identification may be based on visual observation, law enforcement reports, proximity to chemical storage areas, waste disposal areas, or cooking areas, or based on professional judgment of the consultant; or the consultant may determine that assessment sampling is necessary to verify the presence or absence of contamination. If the consultant determines that assessment sampling is necessary, such sampling shall be conducted in accordance with the sampling protocols presented in Appendices A and D. Sample analysis shall be conducted in accordance with the method requirements presented in Appendices B and D.

WEC failed to perform its duties and fulfill regulatory requirements by failing to identify or recognize signs of contamination. Since, as described later, WEC failed to comply with Section 4.14 of the regulations (4.14. Photographic documentation of property conditions, including cooking areas, chemical storage areas, waste disposal areas, and areas of obvious contamination) the mandatory photographs are not available to objectively assess WEC's observations.

Failure to Comply With Paragraph 4.7

According to State Regulations, during the Preliminary Assessment, the Industrial Hygienist is required to perform specific duties including:

4.7. Identification and documentation of chemical storage areas.

As already noted, WEC ignores the previous information in other reports and states:

Chemicals were not found on the property.

However, since WEC failed to determine the availability of law enforcement documents, as required by regulation, WEC could not have complied with this section.



Similarly, since the field personnel (Ms. Sawitsky) has no documented training in the assessment of illegal drug laboratories, there is no reason to believe that she would be capable of recognizing chemical storage (as is evidence in her report).

Failure to Comply With Paragraph 4.8

According to State Regulations, during the Preliminary Assessment, the Industrial Hygienist is required to perform specific duties including:

4.8. Identification and documentation of waste disposal areas.

In their report, WEC states:

Waste disposal areas were not identified, as the house had been cleaned prior to our initial sampling. A walk through of the exterior of the house did not reveal any areas suspected to be waste disposal areas.

It would appear that WEC merely includes the same language for all of its properties.

WEC made no attempt to identify possible waste disposal areas (such as the septic system on the property).

As already noted, WEC entirely lacks any documentable training in the manufacturing of controlled substances, and entirely lacks any documentable training in the assessment of illegal drug laboratories. Therefore, there is no reason to believe that they would be capable of recognizing such indicators if they were present.

Failure to Comply With Paragraph 4.9

According to State Regulations, during the Preliminary Assessment, the Industrial Hygienist is required to perform specific duties including:

4.9. Identification and documentation of cooking areas.

This is imperative information, where available, since it helps to direct proper decontamination as well as final clearance sampling activities.

Since WEC failed to comply with Sections 4.2 (Law Enforcement Documentation) and Section 4.14 of the regulations (Photographic documentation) and since the field personnel ignored the previous observations and since the field personnel have no documented training in the assessment of illegal drug laboratories, and since the remainder of the report exhibits gross technical incompetence, there is no reason to believe the on-site individual would be capable of recognizing such areas.

Failure to Comply With Paragraph 4.10.

According to State Regulations, during the Preliminary Assessment, the Industrial Hygienist is required to perform specific duties including:

4.10 Identification and documentation of signs of contamination such as staining, etching, fire damage, or outdoor areas of dead vegetation.



There is no indication that WEC conducted the assessment of the exterior grounds. WEC ignored the areas of staining and etching that had been previously identified.

In fact, at least three of the previous reports reported staining, and indeed, even law enforcement identified staining –

The South Metro Drug Task Force (SMDTF) investigated the property on November 26th, 2006. The report mentions the observation of visual staining and odors associated with Methamphetamine manufacturing. A copy of the report is attached to the Preliminary Assessment included in this report .

It is difficult to understand why WEC failed to comply with this portion of the regulation except to again point out that WEC is not an Industrial Hygiene firm, and has no documentable training in the assessment of illegal drug laboratories and has no knowledge of what it was they were supposed to be doing, how, or why.

WEC failed to understand the importance of the staining, and what the staining could have been telling them, and failed to meet mandatory regulations and failed to provide “... documentation of signs of contamination such as staining, etching, fire damage, or outdoor areas of dead vegetation.”

Failure to Comply With Paragraph 4.11

According to State Regulations, during the Preliminary Assessment, the Industrial Hygienist is required to perform specific duties including:

4.11. Inspection of plumbing system integrity and identification and documentation of potential disposal into the sanitary sewer or an individual sewage disposal system (ISDS).
... *et seq.*

In their own report, WEC acknowledges they were suppose to perform this function and they falsely claim they did perform this function. In their report, they state:



WEC's preliminary assessment included the following items from the METHAMPHETAMINE PRELIMINARY ASSESSMENT CHECKLIST: Inspection of plumbing system integrity and identification and documentation of potential disposal into the sanitary sewer or individual sewage disposal system (ISDS).

However, this is the ONLY place in their report they even mention the plumbing and the word “plumbing” doesn’t otherwise even occur in their report.

In their report, WEC entirely failed to comply with this regulations and entirely failed to perform any kind of inspection of the plumbing.

For an example of how an ISDS is assessed, one may visits the FACTs site at: <https://www.facebook.com/pages/Forensic-Applications-Inc/106016329428887?ref=ts>

Failure to Comply With Paragraph 4.14

During the Preliminary Assessment, the Industrial Hygienist is required to provide:

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

WEC entirely failed to meet this regulatory obligation and responsibility by failing to provide any photographs of any site conditions.

Failure to Comply With Section 6.0

The sampling performed by WEC was not compliant with State regulations; (and indeed, the vast majority of sampling conducted by WEC was both useless, unnecessary and a waste of financial resources).

State Regulations explicitly provide that:

6.0.1 Except as provided in 6.0.2, assessment sampling shall be conducted as part of the preliminary assessment to characterize the nature and extent of contamination. Assessment sampling and laboratory analysis shall be conducted in accordance with Appendices A, B and D of these regulations.

None of the sampling performed by WEC met the regulatory requirements for such sampling.

Failure to Comply With Paragraph 6.0.3 Insufficient Samples

According to Colorado Regulations:

6.0.3 Post-decontamination clearance sampling shall be conducted to verify that cleanup standards have been met. Sample collection and laboratory analysis shall be conducted in accordance with the procedures set forth in Appendices A, B and D of these regulations.

As such, Appendix A requires:



For drug laboratories, as defined in section 25-18.5-101, C.R.S., whose structural floor plan is not greater than 1,500 square feet, surface sampling shall be collected according to the following schedule. Exception: for pre-decontamination scenarios, any and all other data may be used in lieu of sampling to reject the hypothesis and deem the area to be contaminated.

- For any given functional space, at least 500 cm² of surface shall be sampled, unless the area is assumed to be non-compliant.

Therefore, based on the 12 Functional Spaces, at least 500 cm² should have been collected from each Functional Space. Below, we have summarized compliance with this requirement.

Functional Space	Area Sampled cm ²	500 cm ² collected?	Valid Sample?	Reason
Crawlspace	0	No	No Sample collected	
Attic	0	No	No	Porous Surface
Bedroom 1	100	No	No	
Dining Room	100	No	No	
Bedroom 2	100	No	No	
Bathroom	100	No	No	
Bedroom hallway	200	No	No	
Living room	200	No	No	
Kitchen	200	No	No	
Garage	500	Yes	Yes	
Recreation Den	0	No	No Sample collected	
Covered porch	0	No	No Sample collected	
Barn	0	No	No	Porous Surface

Table 1
Functional Space Inventory
(Shaded Areas Indicate Noncompliance)

Although samples were collected in the attic, for example, as described below, those samples were collected from prohibited porous surfaces, and no samples were collected from allowable surfaces; therefore, zero square centimeters were collected from allowable surfaces.

Therefore, had a legitimate Industrial Hygienist collected the samples, only one area would have been cleared pursuant to mandatory State Regulations.

Failure to Comply With Paragraph 6.1.1

State regulations require that samples be collected from:



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

WEC failed obtain law enforcement documents which may have spoken to the issue of cooking, disposal and storage areas. WEC entirely failed to demonstrate any technical ability to properly assess an illegal drug laboratory, and therefore, WEC failed to identify such areas. Therefore, WEC could not have complied with this section.

WEC ignored this requirement and just made up their own make believe protocol outside of the mandatory regulations. In their report, WEC makes a bizarre self contradictory statement that is full of contradictions, and makes no sense at all. WEC states:

The sampling theory used for the Site was based on observational data from Ms. Sawitsky. To insure an average measurement was taken of each functional space, judgment sampling was conducted. Since there were no identified areas of chemical storage, waste disposal, or cooking a biased sampling theory was not used.

A legitimate Industrial Hygienist, trained in the aspects of illegal drug laboratory assessments would have known that the regulations explicitly require biased sampling for this project:

ATTACHMENT TO APPENDIX A
METHAMPHETAMINE LABORATORIES
SAMPLING METHODS AND PROCEDURES SAMPLING THEORY

Sampling Theory

The type of sampling used for stationary structures and vehicles described in this protocol is a type of sampling recognized as “authoritative” sampling. Authoritative sampling is a nonstatistical sampling design that does not assign an equal probability of being sampled to all portions of the population. Consultants using this protocol will have *a priori* knowledge of the property to be sampled. The *a priori* knowledge, in the hands of a competent consultant, permits immediate inclusion/exclusion of sampling areas, based on professional judgment. As such, the weight of validity of the data gathered with authoritative sampling is largely dependent on the knowledge and competency of the sampler.

...

Biased Sampling

*Biased sampling is the type of authoritative sampling that intends **not to estimate average concentrations** or typical properties, but to estimate “worst” or “best” cases (as described in ASTM Method D6051-96 (2001), *Standard Guide for Composite Sampling and Field Subsampling for Environmental Waste Management Activities*. As described later in this protocol, the aim of the consultant performing post-t-case scenario in the drug laboratory. The term “biased,” as used here, refers to the collection of samples with expected high concentrations.*

Furthermore, the WEC statement indicates WEC has no knowledge of sampling theory since the comment:

To insure an average measurement was taken of each functional space, judgment sampling was conducted.



is a self conflicting comment – judgmental sampling (not “judgment sampling” as erroneously identified in the report) is employed precisely to avoid “averages” and one can never ensure “averages” by employing judgmental sampling.

In their report, WEC demonstrates they have no clue about sampling theory, sampling in general, or the mandatory regulations or how to perform sampling at illegal drug laboratories.

The regulation explicitly state sample SHALL be collected from:

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

Highest levels of contamination are not “averages.”

Furthermore for post-remediation samples, mandatory State regulations require the following:

Post Decontamination sampling

...

Therefore, the role of the consultant in post decontamination sampling, is not to demonstrate that the area is “clean,” but rather, using bias sampling, to diligently attempt to prove, that the area is not clean.

For this project, WEC simply ignored the regulations and invented its own imaginary requirements and performed willy-nilly sampling of unknown locations for unknown reasons and entirely failed to comply with the mandatory State regulations.

Violation of Section 6.2.1 Prohibited Composite Sampling Technique

Mandatory Colorado regulations require:

6.2.2. Composite sampling may only be conducted in situations where contamination is expected to be relatively evenly dispersed throughout a given area, and composite sampling will provide an accurate representation of the area sampled, as described in Appendix A.

A legitimate Industrial Hygienist, trained in the aspects of illegal drug laboratory assessments would have known that contamination under these circumstances exhibits very large sampling error; a legitimate Industrial Hygienist would have known that field data from properly characterized properties exhibit a lognormal distribution (large variations of concentration). That is, the contamination under the circumstances of the subject property will never be “...expected to be relatively evenly dispersed throughout a given area...” and the geometric standard deviations can be as large as 3.0. This distribution is similar to that reported elsewhere.^{5, 6}

⁵ Washington State Department of Health: Summary Results from a Pilot Study to Evaluate Variability and Distribution of Methamphetamine Residue in Remediated Residential Illegal Drug Labs, as reported in NIOSH Method 9106 (DRAFT)



In spite of this, in their report, WEC states:

Composite samples were collected from no more than five (5) areas per composite sample in each functional area.

A legitimate Industrial Hygienist would have known the anticipated distribution of data and would have known that the composite sampling employed by WEC was prohibited by state regulations for this very reason. However since WEC failed to provide a trained, qualified Industrial Hygienist for this assessment, WEC not only violated State regulations by using prohibited sampling techniques, they exhibited a lack of knowledge in basic science and mathematics and basic practice of Industrial Hygiene.

Violation of Section 6.2.1 Prohibited Matrix Mixing

WEC failed to comply with the composite sampling techniques as described in Regulations. According to regulations:

APPENDIX A METHAMPHETAMINE LABORATORIES SAMPLING METHODS AND PROCEDURES

Any composite sampling must consist of like media, matrices or substrates. The mixing of media, matrices or substrates is not permitted.

And, in their report WEC stated:

Composite samples were collected from no more than five (5) areas per composite sample in each functional area. The composite materials consisted of like media, matrices and /or substrates.

However, when we look at the actual samples, we see that WEC in fact did mix matrices in violation of State regulations:

Sample A 1 – Mixed Matrices in Violation of State Regulations

A1.1 Entry Closet top shelf

A1.2 Dining Room wall

Sample A 1 – Mixed Matrices in Violation of State Regulations

A2.1 Living Room closet ceiling

A2.2 Kitchen ceiling light

In many case, WEC entirely failed to even identify the surface sampled, therefore, providing no information about the sample surface:

E14.1 Stable Eq.room

⁶ Martyny JW, Arbuckle SL, McCammon CS, Esswein EJ, Erb N, *Chemical Exposures Associated with Clandestine Methamphetamine Laboratories*, (http://www.njc.org/pdf/chemical_exposures.pdf , May 10, 2004).



For this property, not only did WEC use a prohibited sampling technique (composite sampling), but WEC also collected samples from locations expected to have the lowest probability of contamination.

Since WEC lacks any documentable knowledge of clandestine drug lab assessments, and their work exhibits a lack of knowledge in basic Industrial Hygiene sampling theory, WEC has demonstrated they lack any knowledge of the thermophoretic mechanisms involved in contamination migration and deposition. It is precisely for this reason WEC has collected samples from inappropriate surfaces (ignoring the fact that WEC collected prohibited composites that included prohibited porous surfaces described below).

Thus for example, WEC collected samples primarily from side-walls, ceiling and other areas that would have the lowest probability of demonstrating contamination. A legitimate, trained Industrial Hygienist would not have sampled these areas since they would have understood the deposition mechanisms and known these areas have the lowest probability of being contaminated.

Violation of Appendix A: Prohibited Surfaces

According to mandatory State regulations:

Wipe sampling shall **not** be used to demonstrate that cleanup levels have been met on porous surfaces.

As such, WEC would have been prohibited from collecting samples from prohibited surfaces. However in reviewing their report, we see that of the 16 samples identified, fully one third were conclusively collected from prohibited surfaces:

D10.1 Attic **stud** ceiling garage

D10.2 Attic **stud** ceiling garage

D11.1 House **stud** ceiling

D11.2 House **stud**

D12 House **stud**

For the remaining samples, none of the surfaces were actually identified or documented. Therefore given the gross incompetence, we can presume that in the absence of documentation, all of the samples were collected from prohibited surfaces.

Violation of Appendix A: Mandatory Sampling Theory

According to Colorado's mandatory sampling protocols, the Industrial Hygienist is required to follow the specified sampling theory:

The type of sampling used for stationary structures and vehicles described in this protocol is a type of sampling recognized as "authoritative" sampling. Authoritative sampling is a nonstatistical sampling design that does not assign an equal probability of being sampled to all portions of the population. Consultants using this protocol will have *a priori* knowledge of the property to be sampled. The *a priori* knowledge, in the hands of a competent consultant, permits immediate inclusion/exclusion of sampling areas, based on professional judgment. As such, the weight of validity of the data gathered with



authoritative sampling is largely dependent on the knowledge and competency of the sampler.

Instead of using the mandatory authoritative biased judgmental sampling theory, WEC appears to have collected willy-nilly grab samples with no rational basis for the selection of the areas, and with complete disregard for the regulations.

Violation of Appendix A: Blank Submittal

According to Colorado's mandatory sampling protocols, the Industrial Hygienist is required to follow the specified sampling submittal:

Wipe sampling shall be used to determine the extent of contamination on non-porous surfaces. Wipe samples shall be collected in accordance with the procedures set forth below for either discrete or composite samples.

10. At least one sample media blank, treated in the same fashion but without wiping, should be submitted for every 10 samples collected.

Although WEC collected 16 samples, WEC failed to submit the required number of field blanks.

Violation of 6.1.2 Failure to Address Ventilation System

According to mandatory regulations, when samples are collected during the Preliminary Assessment, they must be collected from:

6.1.2. Areas where contamination may have migrated, such as adjacent rooms or units, common areas, and ventilation systems.

In this case, WEC entirely failed to properly address the ventilation system and apparently collected a sample from the "cooled air side." Presumably this is the combustion make-up air portion of the furnace (since WEC failed to comply with regulations and failed to provide a photograph, there is no way to know for sure).

Although they claim to have collected a sample from the ventilation system, there are no photographic records of the supposed sample, and there is no location for the sample as required on the drawings. WEC cannot document in any way they complied with this regulatory requirement, and they cannot document they even collected the sample they claim to have collected.

Failure to Comply With Paragraph 8.1

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

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



Nowhere in the WEC report, do we find the information as required by State regulations: the WEC report failed to identify the registered owner, and failed to identify the number and types of structures present.

Failure to Comply With Paragraph 8.2

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

8.2. Description of manufacturing methods and chemicals used, based on observations, law enforcement reports and knowledge of manufacturing method.

Nowhere in the WEC report, do we find the information as required by State regulations.

Failure to Comply With Paragraph 8.3

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

8.3. If available, copies of law enforcement reports that provide information regarding the manufacturing method, chemicals present, cooking areas, chemical storage areas, and observed areas of contamination or waste disposal.

Nowhere in the WEC report, do we find the information as required by State regulations. As we already addressed, WEC ignored the presence and availability of any and all law enforcement documents and made no attempt to ascertain the availability of any such documents.

Failure to Comply With Paragraph 8.4

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

8.4. A description of chemical storage areas, with a figure documenting location(s).

Nowhere in the WEC report, do we find the information as required by State regulations.

Failure to Comply With Paragraph 8.5

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

8.5. A description of waste disposal areas, with a figure documenting location(s).

Nowhere in the WEC report, do we find the information as required by State regulations.

Failure to Comply With Paragraph 8.6

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

8.6. A description of cooking areas, with a figure documenting location(s).



Nowhere in the WEC report, do we find the information as required by State regulations.

Failure to Comply With Paragraph 8.7

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

8.7. A description of areas with signs of contamination such as staining, etching, fire damage, or outdoor areas of dead vegetation, with a figure documenting location(s).

Nowhere in the WEC report, do we find the information as required by State regulations.

Failure to Comply With Paragraph 8.8

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

8.8 The results of inspection of plumbing system integrity and identification of sewage disposal mechanism.

Nowhere in the WEC report, do we find the information as required by State regulations.

Failure to Comply With Paragraph 8.9

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

8.9 A description of adjacent units and common areas where contamination may have spread or been tracked.

Nowhere in the WEC report, do we find the information as required by State regulations.

Failure to Comply With Paragraph 8.13

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

8.13. A description of the location and results of initial sampling (if any), including a description of sample locations and a figure with sample locations and identification.

WEC failed to provide description and locations of the initial sampling and failed to provide a description of their own samples and failed to provide the mandatory figure of sample locations.

Failure to Comply With Paragraph 8.14

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

8.14. A description of the health and safety procedures used in accordance with OSHA requirements.



Nowhere in the WEC report, do we find the information as required by State regulations.

Failure to Comply With Paragraph 8.15

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

8.15 A description of the decontamination procedures used and a description of each area that was decontaminated.

Nowhere in the WEC report, do we find the information as required by State regulations.

Failure to Comply With Paragraph 8.16

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

8.16. A description of the removal procedures used and a description of areas where removal was conducted, and the materials removed.

Nowhere in the WEC report, do we find the information as required by State regulations.

Failure to Comply With Paragraph 8.17

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

8.17. A description of the encapsulation procedures used and a description of the areas and/or materials where encapsulation was performed.

Nowhere in the WEC report, do we find the information as required by State regulations.

Failure to Comply With Paragraph 8.18

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

8.18 A description of the waste management procedures used, including handling and final disposition of wastes.

Nowhere in the WEC report, do we find the information as required by State regulations.

Failure to Comply With Paragraph 8.19

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

8.19. A description of the location and results of post-decontamination samples, including a description of sample locations and a figure with sample locations and identification.



Nowhere in the WEC report, do we find the information as required by State regulations; sample locations and surfaces have not been identified, and no figure representing sample locations has been provided.

Failure to Comply With Paragraph 8.20

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

8.20. Photographic documentation of pre- and post-decontamination property conditions, including cooking areas, chemical storage areas, waste disposal areas, areas of obvious contamination, sampling and decontamination procedures, and post-decontamination conditions.

Nowhere in the WEC report, do we find the information as required by State regulations. In fact, we do not see where WEC collected any photographs of the site as required by regulations.

Failure to Comply With Paragraph 8.21

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

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

As already stated, nowhere in the WEC documentation is there any indication that any individual used on this project is A) An Industrial Hygienist, B) in possession of any training, skill or experience of illegal drug laboratory assessment. In their report WEC gives lengthy and useless information on asbestos inspections, and lead inspections, and underground storage tank inspection training. Where WEC mentions methamphetamine, the references are either not germane to assessments such as:

Clandestine Drug (Meth) Lab Decontamination Training and Refresher (16 hr.)

or the WEC fraudulent claim such as:

<p>Clandestine Labs Testing</p> <p>Certified to test for Clandestine Lab (testing for Methamphetamine Contamination) existence in Colorado, Montana, Wyoming, and Idaho.</p>
<p>Copyright © 2013 Weecycle Environmental Consulting - All Rights Reserved - Site Created and Maintained by www.OutsourceLocally.com Powered by WordPress & Atahualpa</p>

Figure 3



Language from the Weecycle Internet Site⁷

WEC has provided no information on qualifications, including professional certification or qualification as an industrial hygienist as defined in section 24-30-1402, C.R.S., and description of experience in assessing contamination associated with methamphetamine laboratories as required.

Failure to Comply With Paragraph 8.22

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

8.22. Certification of procedures and results, and variations from standard practices.

In the preceding document, FACTs has identified scores of deviations from standard practices, and yet not a single one of these deviations has been identified by WEC in their report, as required by regulations. In fact, in their report, WEC patently falsifies their report by stating:

I do hereby certify that I conducted the preliminary sampling in accordance with 6CCR 1014-3, S6 without any variations from the standard practices.

In fact, not only is there no such thing as “6CCR 1014-3, S6” but as documented in this discussion, WEC had dozens and dozens and dozens of variation from the Standard.

Failure to Comply With Paragraph 8.23

According to State Regulations, the Industrial Hygienist is required to provide specific information to be included in the final document including:

8.23. A signed certification statement in one of the following forms, as appropriate:

“I do hereby certify that I conducted a preliminary assessment of the subject property in accordance with 6 CCR 1014-3, § 4, and that I conducted post-decontamination clearance sampling in accordance with 6 CCR 1014-3, § 6. I further certify that the property has been decontaminated in accordance with the procedures set forth in 6 CCR 1014-3, § 5, and that the cleanup standards established by 6 CCR 1014-3, § 7 have been met as evidenced by testing I conducted.”

“I do hereby certify that I conducted a preliminary assessment of the subject property in accordance with 6 CCR 1014-3, § 4. I further certify that the cleanup standards established by 6 CCR 1014-3, § 7 have been met as evidenced by testing I conducted.”

In the WEC report, WEC entirely failed to comply with the mandatory language and instead, WEC whimsically invented their own noncompliant pretend language:

I do hereby certify that I conducted the preliminary sampling in accordance with 6CCR 1014-3, S6 (sic) without any variations from the standard practices. I have reviewed the analytical procedures, certifications and QA/QC protocol from the laboratory Reservoirs

⁷ Copyright Weecycle 2013, used here without permission under the “fair use” doctrine as described in US Code, Title 17 Section 107 “criticism,” “teaching,” “reporting,” and “scholarship.”
Garrison Street Cursory Review



Environmental and confirm that there were no variations from the standard practices regarding the analysis of the samples.

For a start, WEC is so poorly trained that they confused 6 CCR 1014-3, S6 (sic) – which is final verification sampling with 6 CCR 1014-3, §4 (Preliminary Assessment provisions); but WEC also, remarkably, failed to note the numerous variations from standard, and fraudulently claimed there were no variations.

Falsified certification of analytical data

In their report, WEC falsely states:

I have reviewed the analytical procedures, certifications and QA/QC protocol from the laboratory Reservoirs Environmental and confirm that there were no variations from the standard practices regarding the analysis of the samples.

Nowhere in the WEC report has WEC provided any evidence or documentation they “...reviewed the analytical procedures, certifications and QA/QC protocol from the laboratory Reservoirs Environmental...” Indeed, if WEC had actually performed such a review, they would have found the following deficiencies and variations:

- 1) Failure to provide required number of field blanks
- 2) Failure to provide data pursuant to NIOSH 9106: In the WEC report, WEC has reproduced the following table from Reservoirs:

Quality Control Batch	Reporting Limit ($\mu\text{g}/100\text{cm}^2$)	Matrix Blank ($\mu\text{g}/100\text{cm}^2$)	Matrix Duplicate (% RPD)	Matrix Spike (% Recovery)	Laboratory Control Sample (% Recovery)
1	0.05	BRL	12	94	82

2.A) If WEC had any training or knowledge of basic Industrial Hygiene and/or the assessment of illegal drug laboratories, WEC would have noticed that the laboratory incorrectly identified the Matrix Blank as $\mu\text{g}/100\text{cm}^2$ – in fact, the Matrix Blank cannot be expressed in such units. Had WEC actually possessed any legitimate knowledge of such matters and if WEC had actually performed a data review as falsely claimed, WEC would have caught this laboratory error.

2.B) If WEC had any training or knowledge of basic Industrial Hygiene and/or the assessment of illegal drug laboratories, WEC would have noticed that the laboratory incorrectly identified the Reporting Limit as $\mu\text{g}/100\text{cm}^2$ – in fact, the Reporting Limit cannot be expressed in such units. Had WEC actually possessed any legitimate knowledge of such matters and if WEC had actually performed a data review as falsely claimed, WEC would have caught this laboratory error.

In their report, WEC reproduced the Reservoirs Report and included a table with the following heading:



Client ID Number	Lab ID Number	Sample Area (cm ²)	Reporting Limit (µg)	METHAMPHETAMINE CONCENTRATION (µg)	Reporting Limit (µg/100cm ²)	METHAMPHETAMINE CONCENTRATION (µg/100cm ²)
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2.C) If WEC had any training or knowledge of basic Industrial Hygiene and/or the assessment of illegal drug laboratories, WEC would have noticed that the laboratory incorrectly identified the results of the samples as µg/100cm² in violation of standard procedures. According to the NIOSH 9106 Method:⁸

NOTE: For example, if the sample was a composite sample and the area was 400 cm², report results as µg/400 cm² and not averaged to µg/100 cm². In general, if the area wiped was greater than or less than 100 cm², do not convert value to µg/100 cm². To avoid confusion, report separately both µg/sample (C) and the total area wiped in cm² per sample (A) for both discrete and composite samples.

In this case, WEC collected composites of up to 200 cm², and therefore, according to the NIOSH 9106 Method “METHAMPHETAMINE and Illicit Drugs, Precursors and Adulterants on Wipes by Liquid-Liquid Extraction” the results should have been reported as either mass per 200 cm² and/or absolute mass. However, since WEC clearly has absolutely no idea what they are doing or why, and because the falsely claimed to have reviewed the Reservoirs’ data, they entirely failed to comprehend this deviation from the standard method.

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

During the last few years, Colorado has seen a rash of fraudulent, unlawful and grossly incompetent consultant performing meth-lab assessments. The problems these individuals have caused has become so serious and so many Colorado citizens have been injured by the incompetent and fraudulent work by these individuals, that a new Bill was introduced into the Colorado Senate by Senator Louis Tochtrop (SB 13-219). That new Bill will impose heavy fines (\$15,000 per day) on individuals perpetrating these fraudulent activities and regulatory misconduct. Although the bill has passed, the training certification provisions are not yet in place; therefore, fraudulent and incompetent firms continue to create serious problems in Colorado.

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

If WEC did not know that their work was deviating from mandatory State requirements, then that is sufficient to surmise that they lacked the technical competency and therefore authority to perform the work in the first place since it is their professional obligation to conform to those regulations and perform work pursuant to those regulations.

⁸ I was a technical reviewer for NIOSH on the 9106 Method series.
Garrison Street Cursory Review



However, WEC has specifically referenced 6 CCR 1014-3 and specifically referenced CRS §24-30-1402, and WEC explicitly stated that it was aware of those requirements and therefore, WEC knowingly and willingly performed work that 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 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, elements of the “Preliminary Assessment” and the final report on post remediation sampling of an illegal drug lab is filed with the “Governing Body” with jurisdiction wherein the property is located.

WEC explicitly states they possess knowledge of the regulations and the statutes, and therefore, establish the fact that they are aware of such recording.

We recommend this matter be provided to the appropriate prosecutor’s office for evaluation.

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

Ms. Sawitsky has explicitly held herself out to be an Industrial Hygienist. Yet, there is nothing provided in the documentation that would indicate that any of the WEC individuals involved in this property were in fact Industrial Hygienists meeting the State definition.

There was nothing provided in the WEC report that documented any of their personnel were qualified to perform the work or sign the signature page in lieu of a legitimate Industrial Hygienist and there is no Statement of Qualifications indicating qualifications as required by regulation. The incompetence demonstrated in the WEC report is sufficient to demonstrate that Ms. Sawitsky is clearly NOT an Industrial Hygienist and is NOT competent to perform the work and may be falsely representing herself as an Industrial Hygienist.

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)*)), Ms. Sawitsky 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)*).

We recommend that the situation be forwarded to the District Attorney for proper evaluation, and to determine if this case rises to the level of criminal conduct.

We also recommend the Governing Body for this subject property perform an historical review of all other assessments performed by this organization in their jurisdiction to determine if similar violations have occurred.

CONCLUSIONS

- No Preliminary Assessment has been performed at 1170 Garrison St. Lakewood.
- No decontamination as required by regulation has been performed at the property.
- No Decision Statement has been prepared for the property as required by regulations.
- Based on the totality of circumstances and documentation, the property located at 1170 Garrison Street is a noncompliant Illegal Drug Laboratory as that term is defined in CRS 25-18.5-101(8).
- Pursuant to CRS 25-18.5-104 entry into 1170 Garrison Street has been restricted since January, 2009 and that restriction continues to the date of this discussion.
- None of the samples collected by WEC at the subject property were collected in a manner that complies with mandatory state requirements.
- FACTs identified no fewer than 51 regulatory violations and/or omissions.
- The work by WEC cannot be used for any regulatory purposes.

Sincerely,



Caoimhín P. Connell
Forensic Industrial Hygienist



Appendix A

Example of Legitimate Statement of Qualifications





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

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

FACTs project name:	Garrison	Form # ML15
Date Dec 21, 2013		

Caoimhín P. Connell, has been involved in clandestine drug lab investigations 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 and was the contract Industrial Hygienist for the National Center for Atmospheric Research for over ten years. 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 (through the Colorado Division of Criminal Justice) and was the lead instructor for the CRCPI 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 Air Force, the National Safety Council, and the American Industrial Hygiene Association (of which he is a member and serves 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 also a member of the American Conference of Governmental Industrial Hygienists, the Occupational Hygiene Society of Ireland, the Colorado Drug Investigators Association, an appointed Full Committee 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 144 hours of highly specialized law-enforcement sensitive training in illegal drug lab operation, and under supervision of the US Drug Enforcement Agency, 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 as well as through the US NHTSA, and the U.S. Bureau of Justice Assistance (US Dept. of Justice). Additionally, he received extensive training in the Colorado Revised Statutes, including Title 18, Article 18 "Uniform Controlled Substances Act of 1992" and 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 411 assessments of illegal drug labs in Colorado, Nebraska and Oklahoma, and collected over 3,784 samples during assessments (a 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, (State Board of Health *Regulations Pertaining to the Cleanup of Methamphetamine Laboratories*) and was an original team member on two of the legislative working-groups which wrote the regulations for the State of Colorado. Mr. Connell was the primary contributing author of Appendix A (*Sampling Methods And Procedures*) and Attachment to Appendix A (*Sampling Methods and Procedures Sampling Theory*) of the Colorado regulations and a US NIOSH Recommended Peer Review Expert for the NIOSH 9109 Method, *Methamphetamine*. He has been admitted as a clandestine 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 with forensic services and arguments against corrupt regulators, fraudulent industrial hygienists, and unauthorized consultants performing invalid methlab assessments.

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



Multijurisdictional Counterdrug Task Force Training

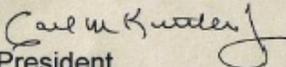


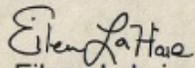
This is to certify that
Caoimhin P. Connell

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



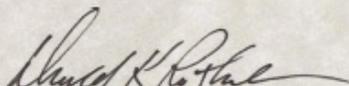
Certificate of Training

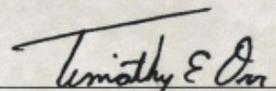
This certifies that

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

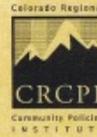
HAS SUCCESSFULLY COMPLETED AN 8-HOUR
STATE AND LOCAL ANTI-TERRORISM TRAINING PROGRAM
NARCOTICS TASK FORCE ANTI-TERRORISM BRIEFING

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



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



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

John M. [Signature]
Instructor

Frank Weyer
Sheriff

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



Director, Law Enforcement Liaison & Education

P. Ritch Wagner
Instructor

C7954



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

Tony Binelle, CLEOA President

ARIDE Instructor

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

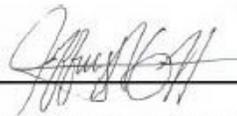
Caoimhin P Connell

User ID: 841645

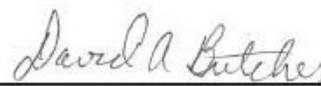
has successfully completed the "Intoxilyzer 9000 Operator Certification Course"
to determine the alcohol concentration in breath specimens pursuant to the
State Board of Health Rules Pertaining to Testing for Alcohol and Other Drugs (5 CCR, 1005-2)
Training was provided by the Evidential Breath Alcohol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

February 21, 2013

Certificate Date



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



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

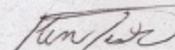
awarded to:

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"