



FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.

January 15, 2016

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

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

RE: 90 Regulatory Violations: "Screening Assessment," 1815B Regal Ct., Louisville, CO 80027

Dear Ms. Brisnehan:

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

As you know, Section 3.1 of Part 3, of 6 CCR 1014-3 requires enforcement actions on the part of the CDPHE whenever the CDPHE has reason to believe that a person has violated any requirement of the regulations. Using a degree of scrutiny for reviews developed and deployed by your office, FACTs has thus far identified a total of 12 *thousand*, three hundred and sixty (12,360) regulatory violations of 6 CCR 1014-3 which your office has either ignored or, in many cases, you have actively suborned the concealment of these violations.

This particular untrained consultant is fraudulently representing himself as an Industrial Hygienist, leaving numerous victims in his wake. FACTs has identified a total of one *thousand*, nine hundred and fourteen (1,914) regulatory violations by this contractor in just eight reports.

FACTs performed a detailed regulatory audit for the report titled:

SCREENING LEVEL ASSESSMENT REPORT
1815 Regal Ct., Unit B, Louisville, CO 80027
Prepared For
Don Roybal
Boulder County Housing Authority
PO Box 471
Boulder, CO 80306
Prepared By
Joe F. Boatman
Quality Environmental Services
4432 Wellington Road, Boulder, CO 80301
June 28, 2015

In our audit we see the typical willful violations that your office has ignored and the gross incompetence such as depicted in the photograph below showing the consultant supposedly collecting a sample from the bathroom fan exhaust – as you know, this photograph alone documents no fewer than four willful regulatory violations.

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



QES Photograph

In our detailed report, FACTs has discussed the following violations:

Rubric and Number of Violations	FACTs Audit Page
Inability to Comply with Section 3.3	4
Violation of Section 3.3	5
Violation of Section 3.5	6
Violation of Section 3.7.1 (Failure to Identify Adjoining Units)	6
Violation of Section 3.7.5	6
Violation of Section 3.7.6.2	7
Violation of Section 3.7.2 (Failure to Identify Attic)	7
Violation of Section 6.1.3	7
Violation of Section 6.1.3.2	8
Violation of Section 6.1.3.3	8
Violation of Section 6.1.3.5	8
Violation of Paragraph 6.2.1 (16 Wipe Violations)	8
Violation of Paragraph 6.2.1 (16 Media Violations)	9
Violation of Paragraph 6.2.2 (12 Template Violations)	9
Violation of Section 6.2.2	10
Violation of Section 6.2.7 (12 Violations)	11
Violation of Section 6.2.14	13
Violation of Section 6.2.14.3	13
Violation of Section 6.2.14.5	13
Violation of Section 6.2.14.6 (Four Violations)	13
Violation of Section 6.2.14.7 (Four Violations)	13
Violation of Section 6.2.14.9 (Four Violations)	14
Violation of Section 6.2.14.11	14
Violation of Section 6.2.15	14
Violation of Section 6.3.6	14
Violation of Section 6.7.1	14
Violation of Section 6.7.1.2 (Failure to Sample Kitchen Exhaust)	14
Violation of Section 6.7.1.2 (Two Violations)	15

Naturally, we are concerned that the Boulder County Housing Authority is being defrauded with the participation of your office, and we are concerned for the public safety of the innocent occupants, who may now be exposed to potentially toxic materials.

We recommend your office notify the Boulder County Housing Authority of the fraudulent work, falsified documents, and recommend the occupants leave the building.

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

Kind regards,

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

Caoimhín P. Connell, Forensic Industrial Hygienist

CC: Daniel S. Miller, Senior Assistant Attorney General

CC: Howard Thigpen, Esq.