



FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.

January 28, 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: 234 Regulatory Violations: "Preliminary 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 12,803 (twelve *thousand*, eight hundred and three) regulatory violations of 6 CCR 1014-3 which your office has ignored. FACTs performed an audit of the public domain document titled:

PRELIMINARY 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

As you know, 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. In our audit, FACTs has discussed the following violations:

Regulatory Rubric	FACTs Audit Page Number
Inability to Comply with Section 4.6	4
Violation of Section 4.0 Preliminary Assessment.	5
Violation of Section 4.1	5
Violation of Section 4.2	6
Violation of Paragraph 4.3	6
Violation of Paragraph 4.3.1 (Attic)	7

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Violation of Paragraph 4.3.1 (Ducting)	7
Violation of Paragraph 4.3.2 (Seven Violations)	7
Violation of Paragraph 4.5	7
Violation of Paragraph 4.6	8
Violation of Paragraph 4.7	9
Violation of Paragraph 4.9	9
Violation of Paragraph 4.11.1 (Two Violations)	10
Violation of Section 4.14	10
Violation of Section 4.15	10
Violation of Section 4.15.3 (Layout of Buildings)	10
Violation of Section 4.17	11
Violation of Section 4.17.1 (Two Violations)	12
Violation of Section 4.17.2	12
Violation of Section 4.17.4	12
Violation of Section 4.17.5	12
Review of Section 6 Violations	13
Violation of Paragraph 6.1.3	13
Violation of Paragraph 6.1.3.2	13
Violation of Paragraph 6.1.3.3	13
Violation of Paragraph 6.1.3.5	14
Violation of Paragraph 6.2.1 (40 Violations - Wipe Aliquots)	14
Violation of Paragraph 6.2.1 (40 Media Violations)	15
Violation of Paragraph 6.2.2 (Three Violations)	15
Violation of Paragraph 6.2.2 (36 Template Violations)	16
Violation of Section 6.2.7 (36 Violations)	17
Violation of Paragraph 6.2.14	18
Violation of Paragraph 6.2.14.2 (Fail to Identify Situs)	18
Violation of Paragraph 6.2.14.3 (Failed to Identify Sampler)	18
Violation of Paragraph 6.2.14.6 (10 Violations- Number of Aliquots)	19
Violation of Paragraph 6.2.14.7 (10 Violations- Number of Containers)	19
Violation of Paragraph 6.2.14.9 (10 Violations- Matrix)	19
Violation of Paragraph 6.2.14.11	19
Violation of Section 6.3.6	19
Violation of Paragraph 6.5	20
Violation of Paragraph 6.9	20
Violation of Paragraph 6.9.1	20
Violation of Paragraph 6.9.7 (Six Violations)	20
Violation of Paragraph 6.9.11.1	21
Colorado Consumer Protection Act	21

Naturally, we are concerned that the Boulder County Housing Authority is the victim of fraud, 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,



Caoimhín P. Connell, Forensic Industrial Hygienist
 CC: Daniel S. Miller, Senior Assistant Attorney General
 CC: Howard Thigpen, Esq.