



**FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.**

February 12, 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](mailto:ctbrisne@smtpgate.dphe.state.co.us), [colleen.brisnehan@state.co.us](mailto:colleen.brisnehan@state.co.us)

RE: 357 Regulatory Violations: "Preliminary Assessment" and "Screening Assessment" at 502C West South Boulder Road 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 13,511 (thirteen thousand five hundred and eleven) regulatory violations of 6 CCR 1014-3 which your office has ignored. FACTs performed an audit of the public domain document titled:

Quality Environmental Services  
Joe Boatman  
Preliminary Assessment (April 28, 2015)  
Including the  
Screening Level Assessment (April 18, 2015)  
502C West South Boulder Road  
Louisville, CO 80027  
Prepared For  
Don Roybal  
Boulder County Housing Authority  
PO Box 471  
Boulder, CO 80306

As you know, this particular untrained consultant is fraudulently representing himself as an Industrial Hygienist, leaving numerous victims in his wake.<sup>1,2,3,4,5</sup> FACTs has identified a

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<sup>1</sup> 189 Violation for 769 Cleveland Circle, Lafayette, CO 80026, February 10, 2015 , CO :  
[http://www.forensic-applications.com/meth/Boatman\\_Cleveland\\_PA\\_RA.pdf](http://www.forensic-applications.com/meth/Boatman_Cleveland_PA_RA.pdf)

<sup>2</sup> 344 violations for 731 Excelsior Place, Lafayette, CO 80026: [http://forensic-applications.com/meth/Boatman\\_Excelsior\\_PA\\_RA.pdf](http://forensic-applications.com/meth/Boatman_Excelsior_PA_RA.pdf)

<sup>3</sup> 2330 Wedgewood Ave., Building 7, Longmont, CO 80503, March 15, 2015 (345 Regulatory Violations):  
[http://forensic-applications.com/meth/Boatman\\_Screening\\_Wedge7\\_RA.pdf](http://forensic-applications.com/meth/Boatman_Screening_Wedge7_RA.pdf)

total of one *thousand*, nine hundred and sixteen (1,916) regulatory violations by this contractor in just eight reports. In our current audit, FACTs has discussed the following violations:

Section	FACTs Audit Page Number
Violation of Section 4.0 Preliminary Assessment.	5
Violation of Section 4.1	5
Violation of Section 4.2	5
Violation of Paragraph 4.3 (2 Violations)	6
Violation of Paragraph 4.3.1 (3 Violations)	6
Violation of Paragraph 4.3.2 (7 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 (2 Violations)	9
Violation of Section 4.14 (3 Violations)	10
Violation of Section 4.15	10
Violation of Section 4.15.1	11
Violation of Section 4.15.3 (Layout of Buildings)	11
Violation of Section 4.15.3 (Shed)	11
Violation of Section 4.15.3 (Sample Locations 13 Violations)	12
Violation of Section 4.17	12
"Screening Level Assessment"	14
Violation of Section 3.0 Clearance Sampling	14
Inability to Comply with Section 3.3	14
Violation of Section 3.5	15
Violation of Section 3.6	15
Violation of Section 3.7.1	16
Violation of Section 3.7.5	16
Violation of Section 3.7.6.2	16
Violation of Section 3.7.6.3	17
Violation of Section 6.1.3	17
Violation of Section 6.1.3.2	17
Violation of Section 6.1.3.3	17
Violation of Section 6.1.3.5	18
Violation of Paragraph 6.2.1 (21 Wipe Violations)	18
Violation of Paragraph 6.2.2 (21 Template Violations)	18
Violation of Section 6.2.7 (21 Violations)	19
Violation of Paragraph 6.2.12.5	19
Violation of Paragraph 6.2.14.3 (Sampler Identified)	19
Violation of Paragraph 6.2.14.6 (21 Violations- Number of Aliquots)	19
Violation of Paragraph 6.2.14.7 (21 Violations- Number of Containers)	19
Violation of Paragraph 6.2.14.9 (21 Violations- Matrix)	20

<sup>4</sup> Screening Assessment 1815 Regal Ct., Unit B, Louisville, CO 80027 (90 Regulatory violations):  
[http://www.forensic-applications.com/meth/Boatman\\_Screening\\_Regal\\_RA.pdf](http://www.forensic-applications.com/meth/Boatman_Screening_Regal_RA.pdf)

<sup>5</sup> Preliminary Assessment 1815 Regal Ct., Unit B, Louisville, CO 80027 (234 Regulatory violations):  
[http://www.forensic-applications.com/meth/Boatman\\_Regal\\_PA\\_RA.pdf](http://www.forensic-applications.com/meth/Boatman_Regal_PA_RA.pdf)

Violation of Paragraph 6.2.14.11	20
Violation of Section 6.3.6	20
Violation of Section 6.7.1.2 (Failure to Sample Kitchen Exhaust)	20
Violation of Section 6.7.1.2 (2 Violations - Failure to Sample Exhausts)	20
Violation of Section 4.17.1 (Two Violations)	21
Violation of Section 4.17.3	21
Violation of Section 4.17.4	21
Violation of Section 4.17.5	21
Review of Section 6 Violations	22
Violation of Paragraph 6.1.3	22
Violation of Paragraph 6.1.3.2	22
Violation of Paragraph 6.1.3.3	23
Violation of Paragraph 6.1.3.5	23
Violation of Paragraph 6.2.1 (49 Wipe Violations)	23
Violation of Paragraph 6.2.1 (49 Media Violations)	24
Violation of Paragraph 6.2.2 (49 Template Violations)	24
Violation of Section 6.2.3	25
Violation of Section 6.2.7 (49 Violations)	25
Violation of Section 6.2.12	26
Violation of Section 6.2.12.4 (3 Violations)	26
Violation of Paragraph 6.2.12.5 (Two Violations)	27
Violation of Paragraph 6.2.14	27
Violation of Paragraph 6.2.14.3 (Sampler Identified)	27
Violation of Paragraph 6.2.14.6 (15 Violations- Number of Aliquots)	27
Violation of Paragraph 6.2.14.7 (15 Violations- Number of Containers)	28
Violation of Paragraph 6.2.14.9 (15 Violations- Matrix)	28
Violation of Paragraph 6.2.14.11	28
Violation of Section 6.3.6	28
Violation of Paragraph 6.5	28
Violation of Paragraph 6.8.1	29
Violation of Paragraph 6.9.1	29
Violation of Paragraph 6.9.7	29
Violation of Paragraph 6.9.11.1	30
Colorado Consumer Protection Act	30
Colorado Criminal Code CRS 18-5-113. Criminal impersonation	30
Colorado Criminal Code – Fraud	31

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 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.