FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.

December 4, 2015

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

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

RE: 863 (Eight *hundred* sixty three) regulatory violations associated with Post Remediation Clearance Report: 3830, 3832 and 3834 South Knox Court, Denver, CO 80236

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.*"

Using a degree of scrutiny for reviews developed and deployed by your office, FACTs has thus far identified a total of six *thousand* six hundred and forty nine (6,649) violations of 6 CCR 1014-3that have been ignored by your office.

As you know, Section 3.1 of Part 3, of 6 CCR 1014-3 requires enforcement actions on the part of the CDPHE whenever the CDPHE has reason to believe that a person has violated any requirement of the regulations. FACTs performed a detailed regulatory audit for the report titled:

A.G. Wassenaar, Inc.
Methamphetamine Post-Decontamination Report
3830, 3832 and 3834 South Knox Court
Denver, CO 80236
Manna Investment Group
1630 30th Street, #A495
Boulder, Colorado 80301
January 22, 2015
Project Number: E14598.EC

As discussed in detail in our actual audit for this particular property, none of the clearance samples were valid and the work was other grossly deficient. This property is in the Tri-County Health jurisdiction.

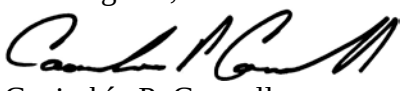
The section below summarizes the 863 regulatory violations that have been identified by FACTs in our regulatory audit of the public domain Post Remediation report for the three Knox Court units.

- Violation of Paragraph 6.1.3
- Violation of Paragraph 6.2.1 (103 Pad Size Violations)
- Violation of Paragraph 6.2.1 (103 Media Matrix Violations)
- Violation of Paragraph 6.2.3 (39 Violations)
- Violation of Paragraph 6.2.4 (103 Violations)
- Violation of Section 6.2.9 (99 Second Pass Violations)
- Violation of Section 6.2.10 (99 Third Pass Violations)
- Violation of Section 6.2.11 (38 Photograph Violations)
- Violation of Section 6.2.11 (99 Documentation Violations)
- Violation of Section 6.2.12.5 (Four Violations)
- Violation of Paragraph 6.2.14
- Violation of Paragraph 6.2.14.2 (Four Violations)
- Violation of Paragraph 6.2.14.3 (Four Violations)
- Violation of Paragraph 6.2.14.6 (37 Violations)
- Violation of Paragraph 6.2.14.8 (37 Violations)
- Violation of Paragraph 6.2.14.9 (37 Violations)
- Violation of Section 6.9.11.1
- Violation of Section 6.9.11.3
- Violation of Section 8
- Violation of Section 8.5 (39 Violations)
- Violation of Section 8.6
- Violation of Section 8.6.1(Photographic Documentation Missing)
- Violation of Section 8.6.1
- Violation of Section 5.7.1
- Violation of Section 5.7.3
- Violation of Section 5.7.3
- Violation of Section 8.6.2
- Violation of Section 8.6.3
- Violation of Section 8.6.4
- Violation of Section 8.6.5
- Violation of Section 8.6.6
- Violation of Section 8.6.7
- Violation of Section 8.8
- Violation of CRS §18-5-114 Offering a false instrument for recording
- Colorado Consumer Protection Act

Naturally, we are concerned for the public safety of the innocent occupants, and the construction personnel , who may now be exposed to potentially toxic materials.

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
Howard Thigpen, Esq.