



FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.

December 16, 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: 108 Regulatory Violations: Screening Level Assessment for 1339 and 1341 E 7th Street, Loveland

Dear Ms. Brisnehan:

Forensic Applications Consulting Technologies, Inc. (FACTs) was asked by one of the victims of Mr. James Dennison of Century Environmental Health (CEH) to review a Real Estate “Screening” for a property at 1339 E 7th Street, in Loveland. FACTs performed the audit vis-à-vis the regulatory requirements of 6 CCR 1014-3 “*Regulations Pertaining To The Cleanup Of Methamphetamine-Affected Properties.*”

FACTs performed a detailed regulatory audit for the report titled:

Century Environmental Hygiene LLC
Methamphetamine Screening Sampling
1339 & 1341 E. 7th Street, Loveland, CO
CEH Project Number: 5086.15
December 1, 2015
Prepared for
Mr. Adam Bennett
Visid Property LLC

Mr. Dennison completed his “screening” just a few days ago, and in spite of the regulations being a year old now, FACTs documented no fewer than 108 regulatory violations associated with the work. One of the victims informed us that you were personally aware of the report, and the problems, and failed to take any regulatory actions as required by 6 CCR 1014-3.

As you know, Mr. Dennison has an extended documented history of gross technical incompetence, botched illegal drug laboratory assessments, falsified documents used in real estate and regulatory violations.^{1,2,3,4,5,6,7,8,9}

¹ 3509 Montrose Street, Evans CO (4/5/06) <http://forensic-applications.com/meth/Initial-review.pdf>

² 728 Cherry Street, Fort Collins, Colorado (403 Regulatory violations)

As you also 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.

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

Regulatory Violation	Page
Failure to Comply with Section 3.1	4
Failure to Comply with Section 3.5	5
Failure to Comply with Section 3.7	5
Failure to Comply with Section 3.7.1 (3 Violations)	6
Failure to Comply with Section 3.7.2 (7 Violations)	6
Failure to Comply with Section 3.7.3 (4 Violations)	6
Failure to Comply with Section 3.7.4	7
Failure to Comply with Section 3.7.5 (14 Violations)	7
Failure to Comply with Section 3.7.6.1 (4 Violations)	7
Failure to Comply with Section 3.7.6.3 (2 Violations)	8
Failure to Comply with Section 6	8
Failure to Comply with Section 6.1.3.2	8
Failure to Comply with Section 6.1.3.3	10
Failure to Comply with Section 6.1.3.5	10
Failure to Comply with Section 6.2.1 (8 violations)	10
Failure to Comply with Section 6.2.2 (8 violations)	11
Failure to Comply with Section 6.2.3	11
Failure to Comply with Section 6.2.4 (8 violations)	11
Failure to Comply with Section 6.2.5 (2 violations)	11

³ 1812 164th Place, Thornton CO (4/23/09) <http://forensic-applications.com/meth/164thCriticalReview.pdf>

⁴ Property address sealed by court order (9/23/09)

⁵ 24018 Deer Valley Road, Golden, CO (8/25/10) <http://forensic-applications.com/meth/DVRCriticalReview.pdf>

⁶ Columbine Apartments, Unit A107 605 Wickes Ave. Craig, CO 81625 (12/30/07) <http://forensic-applications.com/meth/columbinepreliminaryassessment.pdf>

⁷ 19042 E 53rd Ave., Denver, CO (12/10/08) <http://forensic-applications.com/meth/gollaspa.pdf>

⁸ 3251 S. Elati Street, Englewood, CO, http://forensic-applications.com/meth/Regulatory_audit_CEH_Elati.pdf

⁹ Apartment C-105, Blue Ridge Apartments, 775 West Lake Street, Fort Collins, Colorado 80521-4515

Failure to Comply with Section 6.2.7 through 6.2.10 (8 violations)	12
Failure to Comply with Section 6.2.12	12
Failure to Comply with Section 6.2.12.5	13
Failure to Comply with Section 6.2.14	13
Failure to Comply with Section 6.2.14.3	13
Failure to Comply with Section 6.2.14.5 (3 Violations)	13
Failure to Comply with Section 6.2.14.6 (3 Violations)	13
Failure to Comply with Section 6.2.14.9 (3 Violations)	13
Failure to Comply with Section 6.2.14.12 (3 Violations)	14
Failure to Comply with Section 6.2.15	14
Failure to Comply with Section 6.3.6 (8 violations)	14
Failure to Comply with Section 6.7 (3 violations)	15
Failure to Comply with Section 6.7.1.2 (3 violations)	15
Violation of CRS §18-5-114 Offering a false instrument for recording	16
Colorado Consumer Protection Act	17

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

CC: Howard Thigpen, Esq.