



**FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.**

January 20, 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: 112 Regulatory Violations: Screening Level Assessment for 2102 Clarice Court Loveland, CO

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 twelve *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. For this property, FACTs identified 112 regulatory violations.

FACTs performed a detailed regulatory audit for the report titled:

Century Environmental Hygiene, LLC  
Methamphetamine Screening Sampling  
2102 Clarice Court  
Loveland, CO  
CEH Project Number: 4848.15  
Prepared for  
Ms. Kathi Doty  
3156 Ivy Drive  
Loveland, CO 80537

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.<sup>1,2,3,4,5,6,7,8,9,10</sup>

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

As you know, in these notices, we occasionally insert photographs that depicts particularly remarkable regulatory failure. For this property, we could not include any such photographs since, as you already know, the consultant entirely failed to take even a single photograph.

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

Rubric and Number of Violations	FACTs Audit Page Number
REVIEW OF THE DOCUMENT	4
Failure to Comply with Section 3.1	5
Failure to Comply with Section 3.5	5
Failure to Comply with Section 3.7	5
Failure to Comply with Section 3.7.5 (17 Violations)	5
Failure to Comply with Section 3.7.6.1 (4 Violations)	6
Failure to Comply with Section 6	7
Failure to Comply with Section 6.1.3.3	7
Failure to Comply with Section 6.1.3.5	7
Failure to Comply with Section 6.2.1 (12 violations)	8
Failure to Comply with Section 6.2.2 (12 violations)	9
Failure to Comply with Section 6.2.7 through 6.2.10 (12 violations)	9
Failure to Comply with Section 6.2.11 (Sample times 12 violations)	10
Failure to Comply with Section 6.2.11 (Sample Photos 12 violations)	10
Failure to Comply with Section 6.2.12	10
Failure to Comply with Section 6.2.12.5	10
Failure to Comply with Section 6.2.14	11
Failure to Comply with Section 6.2.14.3	11
Failure to Comply with Section 6.2.14.6 (3 Violations)	11
Failure to Comply with Section 6.2.14.8 (2 Violations)	11
Failure to Comply with Section 6.2.14.9 (3 Violations)	11
Failure to Comply with Section 6.2.15	12

<sup>2</sup> 728 Cherry Street, Fort Collins, Colorado (403 Regulatory violations)

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

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

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

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

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

<sup>8</sup> 3251 S. Elati Street, Englewood, CO, [http://forensic-applications.com/meth/Regulatory\\_audit\\_CEH\\_Elati.pdf](http://forensic-applications.com/meth/Regulatory_audit_CEH_Elati.pdf)

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

<sup>10</sup> 108 Regulatory Violations: Screening Level Assessment for 1339 and 1341 E 7th Street, Loveland, [http://forensic-applications.com/meth/CEH\\_E7th\\_Screening\\_RA.pdf](http://forensic-applications.com/meth/CEH_E7th_Screening_RA.pdf)

Failure to Comply with Section 6.3.6 (8 violations)	12
Failure to Comply with Section 6.7	13
Failure to Comply with Section 6.7.1.2 (4 violations)	13
Colorado Consumer Protection Act	13

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.