



FORENSIC APPLICATIONS CONSULTING TECHNOLOGIES, INC.

**Regulatory Audit
of:**

**Screening Level Assessment Report
By
James Dennison
Century Environmental Hygiene, LLC**

**For:
2102 Clarice Court
Loveland, CO**

(112 Violations of 6 CCR 1014-3)

Prepared by:

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January 19, 2016

EXECUTIVE SUMMARY	3
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
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
Violation of the AIHA/ABIH Code of Ethics	14
Violation of ABIH (I)(A)(1)	14
Violation of AIHA (I)(A)(1)	14
Violation of ABIH (I)(A)(5)	14
Violation of ABIH (I)(A)(6)	15
Violation of AIHA (I)(A)(5)	15
Violation of ABIH (II)(A)(1)	15
Violation of ABIH (II)(A)(2)	15
Violation of AIHA (II)(A)(2)	15
Violation of ABIH/AIHA (II)(A)(3)	15
Violation of ABIH/AIHA (II)(C)(1)	16
Violation of AIHA (II)(C)(2)	16
CONCLUSION	16
Appendix A	17
Reviewer's Statement of Qualifications	17



EXECUTIVE SUMMARY

Forensic Applications Consulting Technologies, Inc. (FACTs) is a private S-Corporation in the State of Colorado offering classical Industrial Hygiene services to its clients.

FACTs is performing a series of regulatory audits on public domain documents. This document has been prepared by Forensic Applications Consulting Technologies, Inc. in response to actions by the Colorado Department of Public Health and Environment (CDPHE), and pursuant to the provisions of C.R.S. 18-8-115 *Duty to report a crime - liability for disclosure*.

This review pertains to the document identified as:

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

The level of scrutiny employed in this review is that which has been established by the Colorado Department of Public Health and Environment (CDPHE) in their review of other reports.

The Consultant in question, Century Environmental Hygiene, LLC (CEH), has an extended documented history of gross technical incompetence, botched illegal drug laboratory assessments, falsified real estate documents and regulatory violations.^{1,2,3,4,5,6,7,8,9,10} FACTs has only audited two of Mr. Dennison's reports under

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)

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



the revised 6 CCR 1014-3 regulations, which requires regulatory enforcement; in those two reports, FACTs has identified no fewer than 220 regulatory violations.

We believe that Mr. Dennison's (CEH) deceptive work regarding the assessment of methamphetamine affected properties in Colorado has been reported to the Colorado Attorney General's Office on several occasions, and to date, there has been no enforcement actions.

During our audit for this subject property, (2102 Clarice Court, Loveland, CO) FACTs has identified the same recurring patterns of incompetency and regulatory violations exhibited in previous assessments. Therefore, due to this recurring pattern, it would appear that the violations identified in this audit are willful and intentional.

For this regulatory audit, FACTs has identified no fewer than 112 regulatory violations.

REVIEW OF THE DOCUMENT

According to Colorado Regulations 6 CCR 1014-3, the provisions of 6 CCR 1014-3 apply when:

- 1.2 Applicability - The requirements of this Part apply:
- 1.2.3. When screening level sampling is conducted at a property that has not been deemed a methamphetamine-affected property.

In his report, Mr. Dennison explicitly states he was performing screening level sampling at the property:

At your request, Century Environmental Hygiene, LLC (CEH) performed a Screening Level Assessment (SLA) of the property located at 2102 Clarice Court, CO.

During the performance of screening sampling, the consultant is required to perform specific duties and provide specific information as delineated in Sections 3 and 6 of 6 CCR 1014-3. Specifically:

3.0 Screening Level Assessment of Properties not known to be methamphetamine-affected properties. This section establishes procedures and standards for testing residential real property pursuant to § 38-35.7-103, C.R.S. Screening level assessments pursuant to this section are for the purpose of determining if the subject property is a methamphetamine-affected property. The procedures in this section are not to be used to make clearance decisions.

3.5 The Consultant shall conduct limited composite wipe sampling of the structure(s) for methamphetamine (including fixtures, as appropriate), in accordance with Section 6 of this Part 1.

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

¹⁰ See: 1339 & 1341 E. 7th Street, Loveland, CO (108 violations) <http://forensic-applications.com/meth/sh.pdf>



Failure to Comply with Section 3.1

During screening sampling, the Consultant is required to personally perform specific tasks:

3.1 No person other than a Consultant in good standing may conduct screening level assessments. The Consultant shall personally inspect the subject property to gather all of the information necessary to prepare a Screening Level Assessment Report.

There is nothing in the available documentation for this subject property that indicates that Mr. Dennison performed the work himself. In the past, in violation of State regulations, Mr. Dennison has merely sent an untrained asbestos technician to perform the work for him.

Based on the available documentation, it would appear that, in violation of State regulations, someone other than Mr. Dennison performed the actual site assessment and collected the samples on site.

Failure to Comply with Section 3.5

During screening sampling, the Consultant is required to provide specific documentation pursuant to Section 3.7:

3.5 The Consultant shall conduct limited composite wipe sampling of the structure(s) for methamphetamine (including fixtures, as appropriate), in accordance with Section 6 of this Part 1.

As delineated later in this discussion, Mr. Dennison failed to collect samples pursuant to the mandatory provisions.

Failure to Comply with Section 3.7

During screening sampling, the Consultant is required to provide specific documentation pursuant to Section 3.7:

3.7 Information collected during the screening level assessment shall be documented in a Screening Level Assessment Report and shall include, but not be limited to, the following, to the extent available and applicable:

Failure to Comply with Section 3.7.5 (17 Violations)

During screening sampling, the Consultant is required to provide specific documentation pursuant to Section 3.7:

3.7.5 Photographic documentation of property conditions

As is normal for this consultant, no photographs of any kind were included in the report. The following rooms have been identified either in his report or in the County Assessor's records; however, although the rooms have been identified there are no photographs of the following:



1. Attic
2. Basement Family room
3. Bathroom 1
4. Bathroom 2
5. Bedroom 1
6. Bedroom 2
7. Bedroom 3
8. Bedroom 4
9. Bedroom 5
10. Dining room
11. Exterior grounds
12. Garage
13. Kitchen
14. Laundry room
15. Living room
16. Plumbing
17. Ventilation system

Failure to Comply with Section 3.7.6.1 (4 Violations)

During screening sampling, the Consultant is required to provide specific documentation including:

3.7.6 Documentation of screening level sampling shall include:

3.7.6.1 a description of the sampling procedures used, including sample collection, handling, and quality assurance/quality control (QA/QC);

Nowhere in his report do we find where Mr. Dennison provided documentation or a description of the sampling procedures used; instead Mr. Dennison has merely plugged in boiler plate language that is used in his reports regardless of actual procedures. This conclusion is evidenced by the following language in Mr. Dennison's report:

Field blank samples were handled using media prepared in the office in the same manner as actual samples, were then opened and manipulated in a freshly-gloved hand in the subject property, and then placed in the tube.

As described under the QA/QA provisions, Mr. Dennison entirely failed to collect any field blanks as claimed and as required.

1. Nowhere in the report do we find where Mr. Dennison provided documentation or a description of sample collection;
2. Nowhere in the report do we find where Mr. Dennison provided documentation or a description of handling,



3. Nowhere in the report do we find where Mr. Dennison provided documentation or a description of quality assurance/quality control (QA/QC), including why he failed to provide QA/QC field blanks as required by regulations.

Failure to Comply with Section 6

During screening sampling, the Consultant is required to perform specific activities pursuant to Section 6:

6.1.3 The following sample collection procedures **shall** be followed for **screening level** sampling, preliminary assessment sampling and clearance sampling, except as provided in Section 6.8.2 of this Part 1.

Failure to Comply with Section 6.1.3.3

During screening sampling, the Consultant is required to perform specific activities pursuant to Section 6:

6.1.3.3 Wipe sampling shall be used to determine the extent of iodine contamination whenever there is visible evidence of iodine staining on surfaces that will not be removed.

There is nothing in the documentation that would indicate Mr. Dennison would have the necessary skill set to identify the presence of iodine and therefore, it would have been impossible for Mr. Dennison to have met the requirements of §6.1.3.3 (see a more detailed discussion in the next section.)

Failure to Comply with Section 6.1.3.5

During screening sampling, the Consultant is required to perform specific activities pursuant to Section 6:

6.1.3.5 Vapor sampling shall be used to determine the extent of mercury contamination whenever the preliminary assessment indicates the P2P method of methamphetamine manufacture was used on the property.

Mr. Dennison has never been able to provide any documentation to indicate that he has ever received any training in or knowledge of illegal drug laboratory operations or the assessment of illegal drug laboratories. In previous reports¹¹ for example, Mr. Dennison has stated his entire training in such matters as follows:

Attended meth lab training classes

There is no indication provided in the documentation that Mr. Dennison has ever attended any such classes. Indeed, given the extended history of technical incompetence exhibited by Mr. Dennison, and the statements made in his previous reports, one would conclude that Mr. Dennison has never actually received any legitimate training in the assessment of

¹¹ See for example: Preliminary Assessment For Methamphetamine Prepared for: Metro Brokers Dubrova and Associates ATTN: Ms. Marina Dubrova 550 South Wadsworth Blvd. Suite 590 Lakewood, CO 80226 Assessment Location: 2745 S. Hooker Street Denver, CO April 13, 2011 Project 3165.11



clandestine laboratories. For example, in several of his previous reports¹² his “Brief Bio,” Mr. Dennison claims that he

Sampled first known phenyl-2-propanone method meth lab

The phenyl-2-propanone method has been in existence since at least 1944:¹³ if Mr. Dennison had received any legitimate training in clandestine drug laboratories, he would have been aware of that fact. It is possible Mr. Dennison is referring to a P-2-P laboratory located at 19042 E 53rd Avenue, Denver, Colorado, wherein CEH performed an invalid assessment. However, this property on E 53rd Ave. was making the drug ecstasy, not methamphetamine. The work performed by CEH at that property was characteristically deficient, not compliant with state regulations, and ultimately the Preliminary Assessment¹⁴ and final clearance sampling was performed by FACTs, Inc. who ultimately issued the Decision Statement¹⁵ to clear and release the property.

There is nothing in the documentation for the subject property under discussion that would indicate Mr. Dennison would have the necessary skill set to identify the presence of a P2P laboratory and therefore, it would have been impossible for Mr. Dennison to have met the requirements of §6.1.3.5.

Failure to Comply with Section 6.2.1 (12 violations)

During screening sampling, the Consultant is required to perform specific activities pursuant to Section 6:

6.2 Discrete Wipe Sample Collection Procedures. The following procedure shall be used for collecting discrete wipe samples:

6.2.1 Sample media shall consist of 2x2 inch wipes made of one of the following:

6.2.1.1 Cotton gauze material.

6.2.1.2 4-ply non-woven cotton/polyester blend.

6.2.1.3 Tightly knitted continuous filament polyester.

There is nothing to indicate Mr. Dennison has ever used the mandatory sampling materials, and, since, in violation of §3.7.6.1, Mr. Dennison failed to provide the mandatory sampling description as required, and in violation of §6.2.11, Mr. Dennison failed to provide the mandatory photographs as required, there is no documentation the

¹² Ibid.

¹³ Crossley FS, Moore ML, *Studies on the Leuckart reaction*; J Org Chem 9, 5291 (1944)

¹⁴ Preliminary Assessment of an Identified Illegal Drug Laboratory 19042 E 53rd Avenue Denver, Colorado, December 10, 2008

¹⁵ Final Verification Sampling and DECISION STATEMENT of an Identified Illegal Drug Laboratory At: 19042 E 53rd Avenue Denver, Colorado, March 7, 2009



correct materials were used to perform the sampling at this subject property. Since Mr. Dennison claims to have collected 12 aliquots, this would constitute 12 violations.

Failure to Comply with Section 6.2.2 (12 violations)

During screening sampling, the Consultant is required to perform specific activities pursuant to Section 6:

6.2.2 Delineate a 100 cm² area on the surface to be sampled, either by attaching a physical template to the surface (being careful not to touch the area within the template), or by an equivalently reliable and accurate method. The area within the template (i.e., the sample area) shall be 100 cm².

There is nothing to indicate Mr. Dennison has ever used the mandatory sampling procedures and, since, in violation of §3.7.6.1, Mr. Dennison failed to provide the mandatory sampling description as required and in violation of §6.2.11, Mr. Dennison failed to provide the mandatory photographs as required, there is no documentation the correct procedure was used to perform the sampling. Since Mr. Dennison claims to have collected 12 aliquots, this would constitute 12 violations.

It should also be noted that in previous “screening level assessments,” Mr. Dennison has explicitly stated he does not use a reliable or accurate method to delineate the surface areas. For example,¹⁶

Both samples were 400 cm², but due to the nature of the test protocol, the area is very approximate.

Failure to Comply with Section 6.2.7 through 6.2.10 (12 violations)

During screening sampling, the Consultant is required to perform specific activities pursuant to Section 6:

6.2.7 Wipe the surface using one of the following methods:

6.2.7.1 Square method: Start at the outside edge and progress toward the center of the surface area by wiping in concentric squares of decreasing size.

6.2.7.2 “S” method: Wipe horizontally from side-to-side in an overlapping “S”-like pattern as necessary to completely cover the entire wipe area.

6.2.8 Without allowing the sample media to come into contact with any other surface, fold the sample media with the sampled side in.

6.2.9 Use the same sample media to repeat the sampling of the same area using the same method. If using the “S” method, the second pass shall be sampled by wiping with overlapping “S”-like motions in a top-to-bottom direction.

6.2.10 Fold sampled side in. Using the same sample media, sample the same area a third time. The third pass shall be sampled by wiping using the method not previously used (i.e., use the square method if the “S” method was originally used).

¹⁶ See: 1339 & 1341 E. 7th Street, Loveland, CO (108 violations) <http://forensic-applications.com/meth/sh.pdf>



To our knowledge, Mr. Dennison has never complied with the mandatory sampling protocols and since, in violation of §3.7.6.1, Mr. Dennison has not provided the mandatory sampling description as required, there is nothing to indicate Mr. Dennison used the mandatory sampling protocol. Since Mr. Dennison claims to have collected 12 aliquots, this would constitute 12 violations.

Failure to Comply with Section 6.2.11 (Sample times 12 violations)

During screening sampling, the Consultant is required to perform specific activities pursuant to Section 6:

6.2.11 ...Include notes with the sketch giving any further description of the sample, including sample name and time of collection.

Nowhere in the mandatory report is the required information given. As will be described later, on the chain-of-custody, Mr. Dennison claims to have collected all 12 aliquots at exactly 5:00 p.m.; clearly this would be a physical impossibility.

Failure to Comply with Section 6.2.11 (Sample Photos 12 violations)

During screening sampling, the Consultant is required to perform specific activities pursuant to Section 6:

6.2.11 ... Photograph each sample location.

Nowhere in the mandatory report is the required information given; there are no photographs of any kind in the report. Since there were reportedly 12 aliquots and each needed a photograph, there are 12 violations.

Failure to Comply with Section 6.2.12

During screening sampling, the Consultant is required to perform specific activities pursuant to Section 6:

6.2.12 Submit at least one field blank, prepared and handled in the same fashion but without wiping, for every 10 samples collected, according to the following:

Although he claims to have collected a blank, there is no blank listed in the laboratory report, and there is no blank on the chain-of-custody, and there is no blank in the data table of the report. Therefore, we presume, that similar to other reports, Mr. Dennison has merely stated that he did something that he never actually did.

Failure to Comply with Section 6.2.12.5

During screening sampling, the Consultant is required to perform specific activities pursuant to Section 6:

6.2.12.5 Field blanks shall be representative of the majority of samples collected for every sample group (i.e., discrete or composite).



Since, in violation of §6.2.12 Mr. Dennison failed to provide a field blank, he could not have complied with this mandatory provision.

Failure to Comply with Section 6.2.14

During the performance of screening sampling, the Consultant is required by regulations to provide specific information and documentation including:

6.2.14 Maintain a Chain-of-Custody Record covering the time of sample collection through final disposition. ... At a minimum, the Chain-of-Custody Record shall include the following:

Failure to Comply with Section 6.2.14.3

During the performance of screening sampling, the Consultant is required by regulations to provide specific information on the chain-of-custody including:

6.2.14.3 sampler name and contact information;

The identity of the person collecting the samples is not given.

Failure to Comply with Section 6.2.14.6 (3 Violations)

During the performance of screening sampling, the Consultant is required by regulations to provide specific information on the chain-of-custody including:

6.2.14.6 number of sample aliquots;

The mandatory information is missing from the chain-of-custody.

Failure to Comply with Section 6.2.14.8 (2 Violations)

During the performance of screening sampling, the Consultant is required by regulations to provide specific information on the chain-of-custody including:

6.2.14.8 sample collection time and date;

The mandatory information is missing from the chain-of-custody – the times listed for all three samples (representing 12 aliquots) is 17:00. It would be physically impossible for one person to collect 12 aliquots pursuant to the sampling requirements of §6.2.7 all within one minute. Therefore, possibly one of the sample sets was collected at 17:00 and that would leave two sample sets misidentified.

Failure to Comply with Section 6.2.14.9 (3 Violations)

During the performance of screening sampling, the Consultant is required by regulations to provide specific information on the chain-of-custody including:

6.2.14.9 sample matrix;

The matrix of the aliquots is not identified on the chain-of-custody. The use of the word “matrix” as given by the lab on the chain-of-custody is not the same definition of matrix



as used in the regulations. Mr. Dennison recognized the distinction between these two uses since in his report Mr. Dennison makes the distinction himself:

Samples were analyzed by Reservoirs Environmental, Inc. This lab is approved by CDPHE for meth compliance analysis. The analytical method used was methamphetamine by GC/MS. The lab runs a QA/QC program that includes a matrix blank, matrix duplicate, matrix spike, and laboratory control sample. All lab QA/QC data were within limits.

Therefore, clearly Mr. Dennison should have known that it was his responsibility to provide the matrix of his samples on the chain-of-custody as required.

Failure to Comply with Section 6.2.15

During the performance of screening sampling, the Consultant is required by regulations to provide specific information and documentation including:

6.2.15 Painted-over surfaces. Estimate the concentration of methamphetamine present below a painted-over surface (as defined in Section 2 of this Part 1) by one of the following methods:

Nowhere in the screening report is the information provided and nowhere in the report does Mr. Dennison address the issue of painted over surfaces.

Failure to Comply with Section 6.3.6 (8 violations)

During the performance of screening sampling, the Consultant is required by regulations to perform specific duties pursuant to specific protocols, including:

6.3.6 Collect all individual aliquots from 100 cm² sampling areas.

There is nothing to indicate Mr. Dennison has ever used the mandatory sampling procedures and, since, in violation of §3.7.6.1, Mr. Dennison failed to provide the mandatory sampling description as required, and in violation of §6.2.11, Mr. Dennison failed to provide the mandatory photographs as required, there is no documentation indicating that the correct procedure was used to perform the sampling. It should also be noted that in previous “screening level assessments,” Mr. Dennison has explicitly stated he does not use a reliable or accurate method to delineate the surface areas. Again, for example,¹⁷

Both samples were 400 cm², but due to the nature of the test protocol, the area is very approximate.

Since Mr. Dennison claims to have collected 12 aliquots, we have presumed 12 violations.

¹⁷ See: 1339 & 1341 E. 7th Street, Loveland, CO (108 violations) <http://forensic-applications.com/meth/sh.pdf>



Failure to Comply with Section 6.7

During the performance of screening sampling, the Consultant is required by regulations to perform specific duties pursuant to specific protocols, including:

6.7 Screening level sampling protocols for buildings.

6.7.1.1 a minimum of two (2) 4-aliquot composite samples must be collected, with at least one aliquot being collected from each room. At least one composite sample must include an aliquot from the cold air return of a heating system, if it is a forced air system.

For this property, according to the CEH report, no aliquot was collected from the kitchen.

Failure to Comply with Section 6.7.1.2 (4 violations)

During the performance of screening sampling, the Consultant is required by regulations to perform specific duties pursuant to specific protocols, including:

6.7.1.2 All exhaust fans (including, but not limited to, kitchen, bathrooms, attic vent fans, or whole house exhaust fans) must also be sampled. Exhaust fan samples shall be collected from inside the fan compartment, the fan blade, or the back side of the fan grill. A separate surface sample does not need to be collected from any room from which a fan or ventilation system sample is collected.

For this property Mr. Dennison failed to identify exhaust fans which may be present, except in his data table where he states that exhaust fans were present but he failed to collect the samples from the required locations (“...inside the fan compartment, the fan blade, or the back side of the fan grill ...”)

Bathroom 1, top of exhaust fan cover

Bathroom 2, top of fan cover

In violation of §3.7.6.1, Mr. Dennison failed to provide the mandatory sampling description as required and in violation of §6.2.11, Mr. Dennison failed to provide the mandatory photographs as required; therefore, there is no way to know if there was an attic fan vent or a kitchen vent. Since Mr. Dennison identified the presence of a kitchen and the presence of an attic, it is safe to presume these areas had typical fans associated with them. Since, in violation of §3.7.6.1, Mr. Dennison failed to provide the mandatory sampling description as required, and in violation of §6.2.11, Mr. Dennison failed to provide the mandatory photographs as required, there is no documentation to demonstrate the correct procedure was used to perform the sampling.

Colorado Consumer Protection Act

In Colorado, consumers are protected against deceptive trade practices as delineated in the Colorado Consumer Protection Act, CRS Title 6, Article 1. According to those statutes, a person engages in a deceptive trade practice when, in the course of such person's business or occupation, that person knowingly makes a false representation as to the certification of their services, and/or knowingly makes a false representation as to the



characteristics of their services and/or represents their services are of a particular standard, quality, or grade if he knows or should know that they are not as specified.

We believe that Mr. Dennison with CEH has violated the Colorado Consumer Protection Act for this property, and we have numerous other examples of this type of violation from other reports authored by Mr. Dennison. As a result of the deception, the registered owner of this subject property, and the general public, have been harmed. Since Mr. Dennison has held himself out to be an expert in the area of clandestine drug laboratory assessments, it would be difficult for him to argue that he was unaware that his work on this property was grossly incompetent and grossly deviating from standards.

Violation of the AIHA/ABIH Code of Ethics

It is also our belief that the work performed by Mr. Dennison with CEH constituted a violation of the Code of Ethics of the American Board of Industrial Hygienists and the American Industrial Hygiene Association and fails to meet a minimum standard of professional care. Specifically, it appears that Mr. Dennison has violated the following professional Codes of Ethics:

- Violation of ABIH (I)(A)(1)
- Violation of AIHA (I)(A)(1)
- Violation of ABIH (I)(A)(5)
- Violation of ABIH (I)(A)(6)
- Violation of AIHA (I)(A)(5)
- Violation of ABIH (II)(A)(1)
- Violation of AIHA (II)(A)(1)
- Violation of ABIH (II)(A)(2)
- Violation of AIHA (II)(A)(2)
- Violation of ABIH/AIHA (II)(A)(3)
- Violation of ABIH/AIHA (II)(A)(5)
- Violation of ABIH/AIHA (II)(A)(6)
- Violation of ABIH/AIHA (II)(C)(1)
- Violation of AIHA (II)(C)(2)

Violation of ABIH (I)(A)(1)

Comply with laws, regulations, policies and ethical standards governing professional practice of industrial hygiene and related activities.

Violation of AIHA (I)(A)(1)

Comply with laws, regulations, policies, and ethical standards governing professional practice of industrial hygiene and related activities, including those of professional associations and credentialing organizations.

Clearly, as described above, Mr. Dennison failed to comply with the mandatory Colorado Regulations in the performance of this work.

Violation of ABIH (I)(A)(5)

Report apparent violations of the ethics code by certificants and candidates upon a reasonable and clear factual basis.



Mr. Dennison failed to refer the work to a competent Industrial Hygienist.

Violation of ABIH/AIHA (II)(C)(1)

Follow appropriate health and safety procedures, in the course of performing professional duties, to protect clients, employers, employees and the public from conditions where injury and damage are reasonably foreseeable.

By performing grossly deficient work, as described above, one can reasonably foresee that any occupants of the property, Mr. Gifford's client, and the general public, are now placed at a higher risk of chemical and financial injury and damage due to his lack of technical competency.

Violation of AIHA (II)(C)(2)

Inform appropriate management representatives and/or governmental bodies of violations of legal and regulatory requirements when obligated or otherwise clearly appropriate.

Mr. Dennison has presented himself as familiar with State Regulation 6 CCR 1014-3. Therefore, Mr. Dennison must be aware of the fact that his work is in gross violation of those regulations. Therefore, Mr. Dennison had the professional obligation to bring his regulatory violations to the attention of the Governing Body with jurisdiction over this subject property. The public record does not contain any information to indicate that Mr. Dennison has reported his violations to anyone.

CONCLUSION

For this regulatory audit, FACTs has identified no fewer than 112 violations of 6CCR 1014-3 within the screening sampling assessment performed by Mr. Dennison with Century Environmental Health (CEH) at the property located at 2102 Clarice Court, Loveland, CO.



Appendix A

Reviewer's Statement of Qualifications





Forensic Applications Consulting Technologies, Inc. Consultant Statement of Qualifications

FACTs project name:	General Distribution	Form # ML15
January 19, 2016		

Caoimhín P. Connell, has been involved in clandestine drug lab investigations and assessments since 2002 and meets the Colorado Revised Statute §24-30-1402 definition of an "Industrial Hygienist." He has been a practicing Industrial Hygienist since 1987. Mr. Connell is a recognized authority in drug-lab operations and is a Certified Instructor in Meth-Lab Safety through the Colorado Regional Community Policing Institute, CRCPI (Colorado Division of Criminal Justice) and was the lead instructor for the CRCPI through the Colorado Division of Criminal Justice, providing over 260 hours of methlab training for over 45 Colorado Law Enforcement Agencies, federal agents, probation and parole officers throughout Colorado judicial districts. He has provided meth-lab lectures to the US Interagency Board, US Air Force, the National Safety Council, and the American Industrial Hygiene Association (of which he is a member and served on the Clandestine Drug Lab Work Group and for whom he conducted the May, 2010, Clandestine Drug Lab Course, and is a coauthor of the AIHA methlab assessment publication.)

Mr. Connell is a member of the American Conference of Governmental Industrial Hygienists, the Occupational Hygiene Society of Ireland, the Colorado Drug Investigators Association, an appointed Member of the National Fire Protection Association, and the ASTM International Forensic Sciences Committee, (where he was the sole sponsor of the draft ASTM E50 *Standard for the Assessment of Suspected Clandestine Drug Laboratories*).

From 2009, Mr. Connell served as the Industrial Hygiene Subject Matter Expert on the Federally funded Interagency Board (Health, Medical, and Responder Safety SubGroup), and was elected full member of the IAB-HMRS in 2011 where he now serves. He is the only private consulting Industrial Hygienist in Colorado certified by the Office of National Drug Control Policy High Intensity Drug Trafficking Area Clandestine Drug Lab Safety Program, and P.O.S.T. certified by the Colorado Department of Law.

He has received over 194 hours of highly specialized law-enforcement sensitive training in drug lab operation, and under supervision of the US DEA, he has manufactured methamphetamine using a variety of street methods. He has received highly specialized drug lab assessment training through the Iowa National Guard, Midwest Counterdrug Training Center and the Florida National Guard Multijurisdictional Counterdrug Task Force, St. Petersburg College, Rocky Mountain HIDTA, as well as through the US NHTSA, and the U.S. Bureau of Justice Assistance (US Dept. of Justice) and he is currently ARIDE Certified.

Mr. Connell is a current sworn law enforcement officer who has conducted clandestine laboratory investigations and performed risk, contamination, hazard and exposure assessments from both the law enforcement (criminal) perspective, and from the civil perspective in residences, apartments, motor vehicles, and condominiums. Mr. Connell has conducted over 613 assessments of illegal drug labs in CO, SD, NE, OK, and collected over 5,565 samples during assessments (a partial detailed list of drug lab experience is available on the web at): <http://forensic-applications.com/meth/DrugLabExperience2.pdf>

He has extensive experience performing assessments pursuant to the Colorado meth-lab regulation, 6 CCR 1014-3, and was an original team member on two of the legislative working-groups which wrote the original regulations for the State of Colorado and he was the primary author of Appendix A (*Sampling Methods And Procedures*) and Attachment to Appendix A (*Sampling Methods and Procedures Sampling Theory*) of the original Colorado regulations. Mr. Connell strongly objected to the unscientific, unfounded and inappropriate amendments now found in regulation.

Recommended by the US NIOSH as Peer Review Expert for the NIOSH 9109 Method, *Methamphetamine*, he has been admitted as a drug lab expert in Colorado, and an Industrial Hygiene Expert in Colorado in both civil and criminal courts as well as Federal Court in Pennsylvania. He has provided expert testimony in several criminal cases including Grand Jury testimony and testimony for US Bureau ATF and he testified before the Colorado Board of Health and Colorado Legislature Judicial Committee regarding methlab issues. Mr. Connell has provided services to private consumers, Indian Nations, State Investigators, and Federal Investigators, and provided testimony regarding criminal activities of staff members at the Colorado Department of Public Health Environment.



Multijurisdictional Counterdrug Task Force Training

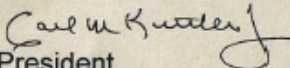


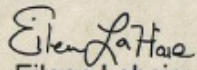
This is to certify that
Caoimhin P. Connell

Has satisfactorily completed the following 24 hour MCTFT training course held at
DIVIDE, CO

Rural Patrol

Training held 9/27/2004 through 9/29/2004


President
St. Petersburg College


Eileen Lahaie
MCTFT Director

A partnership between The Florida National Guard and St. Petersburg College

Midwest Counterdrug Training Center



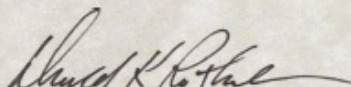
Certificate of Training

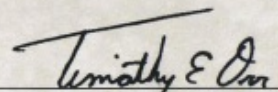
This certifies that

Caoimhin Connell

Has successfully completed the
Clandestine Laboratory Certification

Cheyenne, WY
40 Training Hours
2-6 August 2004


Network Environmental Systems, Inc.


LTC Timothy E. Orr
Commandant



Center *for* Task Force Training™

THIS IS TO CERTIFY THAT

Caoimhin P. Connell

HAS SUCCESSFULLY COMPLETED 20 HOURS OF TRAINING IN

METHAMPHETAMINE INVESTIGATION MANAGEMENT

MARCH 20-22, 2006

DENVER, COLORADO

Domingo S. Herraiz
Director, Bureau of Justice Assistance

Training coordinated by the
Institute for Intergovernmental
Research® on behalf of BJA



State and Local Anti-Terrorism Training

THIS IS TO CERTIFY THAT

Caoimhin P. Connell

HAS SUCCESSFULLY COMPLETED AN 8-HOUR
STATE AND LOCAL ANTI-TERRORISM TRAINING PROGRAM
NARCOTICS TASK FORCE ANTI-TERRORISM BRIEFING

June 1, 2006

Denver, Colorado

Domingo S. Herraiz
Director, Bureau of Justice Assistance



Training coordinated on behalf of BJA
by the Institute for Intergovernmental Research

*Rocky Mountain
High Intensity Drug Trafficking
Area*



Certifies that



Caoimhín Connell

has attended

4 hours of

Hash Oil Extraction: The Scene and The Patient

Aurora, CO

July 25, 2014

Training Manager, Rocky Mountain HIDTA

Director, Rocky Mountain HIDTA



www.nesglobal.net

Certificate of Completion

Caoimhin Connell

has successfully completed training in

Advanced Clan Labs: Beyond the Basics

presented by

NES, Inc.

1141 Sibley Street Folsom, CA 95630

Instructor - Brian Escamilla

04/28/14 04/30/14

Date

Contact Hours:24

This certifies that

Caoimhin P Connell

Has met the requirements for the online course

Expert Testimony Training for the Prosecutor and Scientist



11-07-2012

Certificate Number: 1109778763

For more information please visit <http://www.rti.org/forensiced>



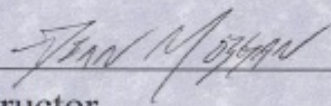
**Park County Sheriff's Office
Certificate of Completion**

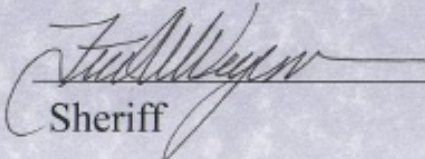
Caoimhin Connell

has completed an 8 hour course in:

Crime-scene Approach and Evidence Collection

Completed this 29th day of April, 2009


Instructor


Sheriff

***Rocky Mountain
High Intensity Drug Trafficking
Area***



Certifies that



Caoimhín P. Connell

*has attended
2 hours of
Hash Oil Explosions
Woodland Park, CO
May 31, 2014*

Training Manager, Rocky Mountain HIDTA

Director, Rocky Mountain HIDTA

Certificate of Completion

This Will Certify That

Caoimhín P. Connell

Successfully Completed

Prescription Drug Crimes

7 Hours Completed

At: CO Law Enforcement Officers Assn. On: September 30, 2010
Greeley, Colorado

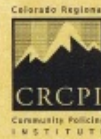


P. Ritch Wagner
Instructor

Director, Law Enforcement Liaison & Education



COPS
COMMUNITY ORIENTED POLICING SERVICES
U.S. DEPARTMENT OF JUSTICE



Certificate of Training

This is to certify that
Caoimhin Connell

(Name)

Park County Sheriff's Office

(Agency)

If the bearer of this document possesses a 40 Hour certificate pursuant to 29 CFR §1910.120, this certifies the above named has met the refresher training requirements of 29 CFR §1910.120(e)(8) and is hereby **RECERTIFIED** in Clandestine Laboratory Safety / HazWoper

Sponsored by
Rocky Mountain High Intensity Drug Trafficking Area
Colorado Regional Community Policing Institute

Caoimhin P. Connell 4/12/10
Caoimhin P. Connell, Instructor/Date
Glean HARDEY



Colorado Law Enforcement Officers' Association



This is to certify that

CAOIMHIN CONNELL

Completed **ARIDE (Advanced Roadside Impaired Driving Enforcement)**

hosted by **Loveland Police Department**

on **February 28 – March 1, 2011**

Tom Finelle
Tom Finelle, CLEOA President

M. A. [Signature]
ARIDE Instructor

State of Colorado



THE BOARD ON PEACE OFFICER STANDARDS AND TRAINING
HEREBY AWARDS THIS CERTIFICATE
AS INSPECTOR OF VEHICLE IDENTIFICATION NUMBERS
TO

CAOIMHIN PADRAIG CONNELL

August 27, 2008

Date

VIN INSP— **0952**

Number

For fulfilling the prescribed requirements as an Inspector of Vehicle Identification Numbers and as a peace officer in Colorado, pursuant to Title 42, Article 5, Section 206 Colorado Revised Statutes.

Bill Ritter Jr.

Governor

John W. Suthers

Attorney General, Board Chairperson

Certificate of Completion Intoxilyzer 9000 Operator Certification Course

*The Evidential Breath Alcohol Testing Program of the
Colorado Department of Public Health and Environment certifies that*

Caoimhin P Connell

User ID: **841645**

*has successfully completed the "Intoxilyzer 9000 Operator Certification Course"
to determine the alcohol concentration in breath specimens pursuant to the
State Board of Health Rules Pertaining to Testing for Alcohol and Other Drugs (5 CCR, 1005-2)
Training was provided by the Evidential Breath Alcohol Testing Program
of the Colorado Department of Public Health and Environment.*

February 21, 2013

Certificate Date

Jeffrey A. Groff

Jeffrey A. Groff, Program Manager
Evidential Breath Alcohol Testing Program



David A. Butcher

David A. Butcher, Director
Laboratory Services Division
Colorado Department of Public Health
and Environment

Certification expires 180 days from certificate date. Recertification must be per 5 CCR 1005-2.



Certificate of Achievement

awarded to:

Caoimhin P. Connell

Has successfully completed Methamphetamine Lab Cleanup Management and Supervision training in accordance with 29 CFR 1910.120 and State Regulations Pertaining to the Cleanup of Methamphetamine Laboratories (8Hrs.)

June 1st, 2005

Date

Signed

HAZMAT Plans & Programs, Inc. 30 S. Havana St. Suite 304F Aurora, Colorado 80012 (303) 360-9801
"Safety Plans, Programs and Training Tailored To The Needs Of Your Business"

CERTIFICATE OF COMPLETION

COLORADO LAW ENFORCEMENT ASSOCIATIONS TRAINING PROJECT

This Certifies That

Caoimhin Connell

Has Attended the

CLEAT 40-HOUR

Train the Trainer Course

Hosted by Breckenridge Police Department
August 14-18, 2006

Karen M. Renshaw, CAE
Executive Director
Colorado Association of Chiefs of Police



John L. Kammerzell
Executive Director
Police Officer Standard & Training



Donald E. Christensen
Executive Director
County Sheriffs of Colorado



COLORADO AUTO THEFT INVESTIGATORS



SINCE 1973

This is to certify that

Caoimlin P. Connell

Has completed a 24 hour training program in Vehicle Identification Number
Inspection

Presented this 24th day of May, 2008

CATI President

VIN Inspector Training Coordinator

State of Colorado



THE BOARD ON PEACE OFFICER STANDARDS AND TRAINING
AWARDS THIS CERTIFICATE
TO

CAOIMHIN PADRAIG CONNELL

May 6, 2004

Date

B- 10670

Number

For fulfilling the prescribed requirements for certification. This certificate expires three years from date of issuance unless the certificate holder meets the requirements for continued certification as established by law and the P.O.S.T. Board.

Governor

Attorney General, Board Chairperson

**Rocky Mountain
High Intensity Drug Trafficking
Area**



Certifies that



Caoimhín Connell

has attended

16 hours of

MCTC / RMHIDTA Indoor Marijuana Grows

Centennial, CO

August 28-29, 2014

Training Manager, Rocky Mountain HIDTA

Director, Rocky Mountain HIDTA

CERTIFICATE OF TRAINING

THIS IS TO CERTIFY THAT

Caoimhín Connell

Has completed 4 hours of successful training for

The Hazards of Hash Oil Extraction

Held at IRIS Fire Investigations in Englewood, CO

on this 7th day of November, 2014

Robert K. Toth
IRIS Fire Investigations, President



COLORADO
Department of Public
Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

December 30, 2014

Caoimhin Connell
Forensic Applications Consulting Technologies Inc
185 Bounty Hunter Ln
Bailey, CO 80421

Consultant Interim Authorization Approval

Dear Caoimhin Connell:

The Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment (the Department) has reviewed the application for Consultant Interim Authorization and has determined the application to be complete and in compliance with 6 CCR 1014-3, Regulations Pertaining to the Cleanup of Methamphetamine-Affected Properties (the Regulations).

The Department approves the application for **Consultant Interim Authorization**. This interim authorization approval shall expire on June 15, 2015.

Assessment and sampling of methamphetamine-affected properties may only be conducted by Consultant Firms that have received interim authorization under Part 2, Section 3.2.4 of the Regulations. Therefore, this interim authorization may only be used to conduct assessment and sampling of methamphetamine-affected properties for a Consultant Firm that has received interim authorization approval from the Department.

Approved By: _____

Date: _____

12/30/2014





COLORADO
Department of Public
Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

December 30, 2014

Forensic Applications Consulting Technologies Inc
185 Bounty Hunters Ln
Bailey, CO80421

Consultant Firm Interim Authorization Approval

Dear Forensic Applications Consulting Technologies Inc:

The Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment (the Department) has reviewed the application for Consultant Firm Interim Authorization and has determined the application to be complete and in compliance with 6 CCR 1014-3, Regulations Pertaining to the Cleanup of Methamphetamine-Affected Properties (the Regulations).

The Department approves the application for **Consultant Firm Interim Authorization**. The firm shall only utilize individuals who have received interim authorization under Part 2, Section 3.2.1 of the Regulations to conduct assessment and sampling of methamphetamine-affected properties. This interim authorization approval shall expire on June 15, 2015.

The Regulations require submittal of electronic copies of reports to the Department. Electronic copies of reports should be submitted via email to cdphe_methlabdocuments@state.co.us. The words "report" or "report submittal" should be included in the email subject line, and the property address should be included in the body of the email.

Alternatively, compact disks with electronic copies of reports may be mailed to:

Colorado Department of Public Health and Environment
Hazardous Material and Waste Management Division
4300 Cherry Creek Drive South
Denver, CO 80246-1530
Attn: Colleen Brisnehan or Richard Mruz

Packages may also be hand delivered to the Department's mail room located in the northwest corner of Building B (700 South Ash Street).

Approved By: _____

Date: 12/30/2014

