



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREYER  
DIRECTOR

January 17, 2018

Mr. Jeff Bedient  
Bedient Construction, Inc.  
2573 Leach  
Rochester Hills, MI 48039

Ms. Sadie Hanes  
Property Owner  
35 High St.  
Clawson, Michigan 48017

SRN: U821800017, Oakland County

Dear Ms. Hanes and Mr. Bedient:

**VIOLATION NOTICE**

On December 4, 2017, the Department of Environmental Quality (DEQ), Air Quality Division, conducted a complaint investigation of the residential property located at 30 Florence St., Clawson. The purpose of this inspection was to determine Bedient Construction Inc's and Ms. Hanes's compliance with the requirements of Title 40 of the Code of Federal Regulations, Part 61, Subpart M (National Emission Standard for Asbestos), and Rule 942 of Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

According to our investigation, Ms. Hanes owns the property and Bedient Construction, Inc. performed demolition activities. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, staff observed that 30 Florence St. was demolished without a thorough inspection for asbestos or submittal of the required 10-day notice of intent to renovate/demolish to the DEQ.

Process Description	Section Violated	Comments
Demolition activities at 30 Florence St., Clawson.	§61.145(a)	Failure to thoroughly inspect for asbestos prior to demolition.
	§61.145(b)(1)	Failure to notify for demolition

Please be advised that because a thorough inspection for asbestos was not conducted by a certified asbestos inspector prior to the initiation of demolition activities, one or more of the following violations may have also occurred:

Process Description	Section Violated	Comments
Demolition activities at 30 Florence St., Clawson.	§61.145(b)(3)(i)	Failure to provide notice prior to asbestos work
	§61.145(b)(4)(vi)	Failure to estimate the amount of Regulated Asbestos-Containing Material (RACM)
	§61.145(c)(1)	Failure to remove RACM
	§61.145(c)(3)	Failure to wet during stripping
	§61.145(c)(4)	Failure to contain in leak tight container
	§61.145(c)(6)(i)	Failure to wet RACM that has been stripped
	§61.145(c)(8)	No contractor supervisor on site
	§61.150(a)	Visible emissions from asbestos containing waste material generated by source
	§61.150(a)(1)(ii)	Visible emissions from handling operations
	§61.150(a)(1)(iii)	Failure to seal while wet
	§61.150(a)(1)(v)	No generator labels
	§61.150(b)(1)	Failure to deposit asbestos containing waste material as soon as practical
	§61.150(c)	No signs during loading and unloading

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 7, 2018 (which coincides with 21 calendar days from the date of this letter). **Please note that all parties are required to respond to this violation notice.** The written response should include:

- The dates the violations occurred;
- An explanation of the causes and duration of the violations;
- Whether the violations are ongoing;
- A summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and
- What steps are being taken to prevent a reoccurrence.

If Bedient Construction, Inc. and/or Ms. Hanes believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Mr. Jeff Bedient  
Ms. Sadie Hanes  
Page 2  
January 17, 2018

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of 30 Florence St., Clawson. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Tammy S. Bell  
Senior Environmental Quality Analyst  
Air Quality Division  
313-330-0105

Enclosure

cc: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Christopher Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Karen Kajiya-Mills, DEQ  
Ms. Joyce Zhu, DEQ