



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
DETROIT DISTRICT OFFICE



DANIEL EICHINGER  
ACTING DIRECTOR

April 27, 2023

Veronica Johnson  
Detroit Land Bank Authority  
500 Griswold St., Suite 1200  
Detroit, MI 48226

Katrenia Moncrief  
MWV Environmental Services, Inc.  
18407 Weaver St.  
Detroit, MI 48228

SRN: U822301247, Wayne County

Dear Katrenia Moncrief & Veronica Johnson:

### **VIOLATION NOTICE**

On April 18, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a complaint inspection of a subject property located at 4078 Beniteau St., Detroit. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations (CFR), Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart M and Rule 942 of the administrative rules promulgated under Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

According to our investigation, the Detroit Land Bank Authority owns the facilities and MWV Environmental Services, Inc. performed the renovation activities at each residence. These homes are not part of the demolition program but are being renovated for re-occupancy. The NESHAP for Asbestos holds both the owner and operator liable for violations.

During the inspection, staff observed the following: A subject single-family residence undergoing asbestos abatement activities. The required notification had not been revised to reflect current site conditions at 4078 Beniteau St. An asbestos dumpster located at 4078 Beniteau St. was inspected, and the asbestos containing waste material (ACWM) within was not properly labeled with waste generator information. MWV Environmental Services, Inc. staff indicated that the ACWM came from an abatement project located at 4821 Maryland St., Detroit which had just finished up last week. 4821 Maryland St. is also owned by the Detroit Land Bank Authority and was being renovated by MWV Environmental Services, Inc.

<b>Process Description</b>	<b>Section Violated</b>	<b>Comments</b>
Renovation activities at subject residential buildings.	40 CFR 61.145(b)(2)	Failure to update notice to reflect site conditions. (4078 Beniteau St.)
	40 CFR 61.150(a)(1)(v)	No generator labels affixed to ACWM in a dumpster located at 4078 Beniteau St. (4821 Maryland St.)

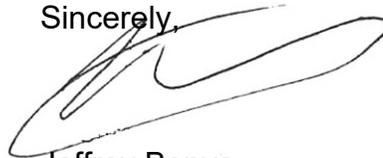
Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by May 18, 2023 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violations occurred; an explanation of the causes 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.

Please submit the written response to Jeffrey Benya at EGLE, AQD Detroit District Office, 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or [benyaj@michigan.gov](mailto:benyaj@michigan.gov) and submit a copy to Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or [wolfj2@michigan.gov](mailto:wolfj2@michigan.gov).

If either party believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide factual information to explain your position.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jeffrey Benya  
Senior Environmental Quality Analyst  
Air Quality Division  
313-618-0372

Veronica Johnson, Detroit Land Bank Authority  
Katrenia Moncrief, MWV Environmental Services, Inc.  
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cc: Hosam Hossanien, City of Detroit BSEED  
Crystal Rogers, City of Detroit BSEED  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Dr. April Wendling, EGLE  
Jason Wolf, EGLE  
Regina Angellotti, EGLE