



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
AIR QUALITY DIVISION



PHILLIP D. ROOS  
DIRECTOR

January 14, 2025

VIA E-MAIL

Vince Howard  
Vin-Con, Inc.  
41130 East Ann Arbor Trail  
Plymouth, Michigan 48170

Joe Stchur  
Prime Healthcare - Garden City Hospital  
6245 Inkster Road  
Garden City, Michigan 48135

SRN/ID: U821610469; Wayne County

Dear Vince Howard and Joe Stchur:

**VIOLATION NOTICE**

On December 16, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection at the property located at 6265 Inkster Road, Garden City, Wayne County. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations (40 CFR), 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, Prime Healthcare - Garden City Hospital owns the property and Vin-Con, Inc. conducted the renovation activities. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, AQD staff noted an active asbestos abatement project under negative pressure enclosure (NPE). Notified abatement was for regulated asbestos containing material (RACM) mudded pipe fittings. While work was progressing in the basement NPE, EGLE staff identified mudded pipe fittings, broken and dry, on the ground in several rooms on the first floor. Sampling conducted by AQD staff determined this material to be RACM. Vin-Con, Inc. personnel stated that this material was thought to be non-RACM based on the survey they were provided and was inadvertently disturbed during decommissioning activities. Review of the survey determined that it only identified RACM mud pipe fittings in the basement, and in fact, did not identify mud pipe fittings anywhere else within the subject facility.

Process Description	Section Violated	Comments
Asbestos abatement activities at a subject building.	40 CFR 61. 145 (a)	Failure to thoroughly inspect for asbestos prior to renovation activities.
	40 CFR 61.145(c)(6)(i)	Failure to wet RACM that has been stripped.

## **VIOLATION NOTICE**

Vince Howard and Joe Stchur

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Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by February 4, 2025 (which coincides with 21 calendar days from the date of this letter). The response should include:

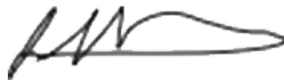
- The dates the violations occurred.
- An explanation of the causes and duration of the violations.
- Whether the violations are ongoing.
- A summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place.
- What steps are being taken to prevent a reoccurrence.
- Acknowledgement of receipt, and understanding of, the attached "Understanding NESHAP" fact sheet.

The signed written response from the owner and operator to this violation notice may be submitted by mail and directed to the attention of Jeff Benya, Asbestos Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 and must include a copy to Jason Wolf, Enforcement Unit at the same address. The response may be scanned and e-mailed to [BenyaJ@Michigan.gov](mailto:BenyaJ@Michigan.gov) and [WolfJ2@Michigan.gov](mailto:WolfJ2@Michigan.gov).

If the listed parties believe 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.

Thank you for your attention to resolving the violations cited. 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,



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

Attachments: Sample Results and the NESHAP Fact Sheet

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Dr. April Wendling, EGLE  
Tammy Bell, EGLE  
Jason Wolf, EGLE