



GRETCHEN WHITMER
GOVERNOR

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

EGLE
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

Page 2

January 14, 2025

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:

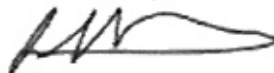
- The dates the violations occurred.
- An explanation of the causes and duration of the violations.
- Whether the violations are ongoing.
- A summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place.
- What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

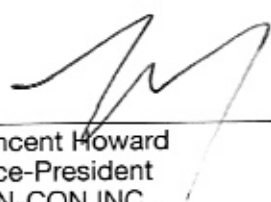
cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Dr. April Wendling, EGLE
Tammy Bell, EGLE
Jason Wolf, EGLE

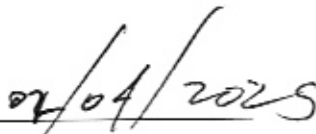
02/04/2025

RE; Response to violation notice dated 01/14/2025 SRN / ID U821610469 Wayne County
Garden City Hospital, 6245 Inkster Rd. Garden City, MI. 48135

Explanations / Response to page 2 of violation

- * 12/16/2024
- * ETC Survey did not report the ACM, so we took it out assuming it was non acm
- * The violations was a one time incident and is not on going
- * We remediated all of the ACM and disposed of all cross contaminated material as ACM as well.
- * VINCON will now re inspect all ACM surveys prior to abatement.
- * I acknowledge the attached "Understanding NESHAP" fact sheet. And take full responsibility for the above violation.


Vincent Howard
Vice-President
VIN-CON INC.





January 22, 2025

Mr. Vincent Howard
VinCon Inc.
41130 East Ann Arbor Trail
Plymouth, MI 48170

RE: ETC Asbestos Survey at Garden City Hospital

Mr. Howard,

I would like to extend to you ETC's apologies for not properly locating and quantifying all the pipe joint material in the decommissioned Garden City Hospital Administration building. While we identified the material in the basement area(s) but failed to properly locate and quantify the same material on the first and second floor.

ETC wants to stand behind our work so please let me know the final resolution of the problem so we can find an acceptable solution between ETC and VinCon..

Again, my sincere apologies.

Sincerely,

Jeremy Westcott
Managing Director

Email: jeremy.westcott@2etc.com
Tel: (734) 955-6600, ext. 218
Cell: (734) 649-9680
Fax: (734) 955-6604

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