



February 3, 2025

State of Michigan  
Department of Environment, Great Lakes, and Energy  
Air Quality Division  
Constitution Hall  
525 West Allegan St.  
PO Box 30260  
Lansing, MI 48909-7760

RE: SRN/ID: U821610469, Wayne County

Dear Jeff Benya,

This correspondence is in response to the EGLE letter, dated January 14, 2025, addressed to myself and Vince Howard, Vin-Con, Inc. regarding a violation in asbestos abatement activities at 6265 Inkster Road, Garden City, MI 48135. The 2 violations identified on **December 16, 2024**; a failure to thoroughly inspect for asbestos prior to renovation activities 40 CFR 61. 145(a) and failure to wet RACM that has been stripped 40 CFR 61.0145(c)(6)(i) were shared with the general contractor, Lakeshore Global Corp. on January 14, 2025.

Below is the explanation of the cause from Vin-Con, Inc date 2/3/2025:

I verbally explained this to Allen when Jeff Benya met with Etc and I on the site after this transpired.

I've known Jeff from EGLE for years and this is the first violation we have received from him. Since we are the contractor on record not the Survey company we get the violation.

As far as the violation goes.

1. I'm getting penalized for not inspecting what should have already been inspected under the survey. Which wasn't.

2. Had we known it was ACM we would have handled it as ACM.  
had nothing to do with improper labeling.

We had to spend an extra 2 weeks removing 90 percent if the whole 2 nd floor contents that was cross contaminated and dispose of as ACM. Which cost me about \$26,000 dollars that I'm not charging for since I referred you to ETC. This is the first time that this has happened with them / us.

I sent all of the clearance reports, air monitoring reports and manifest with the close out docs. We will be double checking not only ETC surveys but all surveys we are involved with in the future.

This email is going to the State EGLE as my formal response as well.

We just finished our MIOSHA Audit with out any problems.

The last violation we received was over year ago. And again over a 3 rd party air monitoring problem from EOCT who I hired.

VIN-CON INC takes our asbestos abatement/ Demolition practices very seriously and haven't been in violation for any of our procedures. It's only been 3 rd party.

Not sure when the State will begin holding them responsible, however at the moment we are



# Garden City Hospital

responsible for it all.

So with that being said. I do take responsibility for the ETC oversight and am prepared to deal with the consequences and as mentioned earlier re inspection the inspector prior to abating.

Thank you.

And again.

My apologies as well as ETC's

Best

Vincent.

The violations no longer exist. The remaining RACM was removed on 1/17/2025.

The summary of the actions taken by Vin-Con, Inc. are contained in the explanation and reprinted below:

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VIN-CON INC takes our asbestos abatement/ Demolition practices very seriously and haven't been in violation for any of our procedures. It's only been 3 rd party.

The remaining asbestos containing material that was not removed and the previously removed ACM that was not contained was all removed and contained on 1/17/2025.

Step taken to prevent a reoccurrence are a letter from Environmental Testing & Consulting (ETC) admitting not properly locating and quantifying the pipe joint material on levels 1 and 2 of the facility. The letter is an attachment to this response.

I am acknowledging receipt and understanding of the information contained in the "Understanding NESHP" fact sheet.

Sincerely,

Joe Stchur

Director, Plant Operations

c. Jason Wolf [Wolfj2@michigan.gov](mailto:Wolfj2@michigan.gov)

Attachments: ETC Letter of Apology to 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](mailto:jeremy.westcott@2etc.com)  
Tel: (734) 955-6600, ext. 218  
Cell: (734) 649-9680  
Fax: (734) 955-6604

**Environmental Testing & Consulting**  
38900 West Huron River Dr.  
Romulus, MI 48174

[2etc.com](http://2etc.com)







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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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](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