



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



PHILLIP D. ROOS
DIRECTOR

October 4, 2023

VIA E-MAIL

Dr. Harshavardhan Krishna
IGolf, Inc.
7460 Muerdale Street
West Bloomfield, Michigan 48322

Dr. Harshavardhan Krishna
Governors Conference Center, LLC
7460 Muerdale Street
West Bloomfield, Michigan 48322

Mitchell Brewer
Brewer & Sons
1486 Ladd Road
Wolverine Lake, Michigan 48390

ID: U632305895; U632306283; U632306285; and U632306286; Oakland County

Dear Dr. Harshavardhan Krishna and Mitchell Brewer:

VIOLATION NOTICE

On September 19, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the residential properties located at 29145 Sharidale Street; 29191 Sharidale Street; 29232 Sharidale Street; and 29200 Sharidale Street in Southfield, Michigan. The ID Numbers are: U632305895 (29145 Sharidale Street); U632306283 (29200 Sharidale Street); U632306285 (29232 Sharidale Street); and U632306286 (29191 Sharidale Street).

The purpose of this inspection was to determine the owners and operators compliance with the requirements of Title 40 of the Code of Federal Regulations (40 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, IGolf, Inc. owns the 29200 Sharidale Street property and Governors Conference Center owns the 29145 Sharidale Street; 29191 Sharidale Street; and 29323 Sharidale Street properties and Brewer & Sons performed the demolition activities at the four properties. The NESHAP for Asbestos holds the owners and operator equally liable for violations.

During the inspection, AQD staff observed that four houses that had been demolished and were in various stages of waste removal. EGLE, AQD staff collected samples during the inspection. Cement board that tested positive for asbestos was identified in the waste pile at 29145 Sharidale Street.

Process Description	Section Violated	Comments
Demolition of four residential properties (residential)	40 CFR Part 61.145 (a)	Failure to thoroughly inspect the residential buildings for asbestos prior to demolition.

VIOLATION NOTICE

Dr. Harshavardhan Krishna and Mitchell Brewer

Page 2

October 4, 2023

installation) in preparation for development.	40 CFR 61.145(b)(1)	Failure to provide a 10 working day notification to the AQD for the demolished residential buildings.
	40 CFR 61.145(c)(8)	No asbestos contractor supervisor trained in the asbestos NESHAP on site during the demolitions demolition
	40 CFR 61.150(a)(1)	Failure to adequately wet asbestos containing waste material-building materials were dry.

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by October 25, 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.

The signed written response from the owner and operator to this violation notice may be submitted by mail and directed to the attention of Jeremy Howe, Supervisor, Technical Programs Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. The response may be scanned and e-mailed to HoweJ1@Michigan.gov.

If you believe the above observations or statements are inaccurate or do not constitute a violation 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 above and for the cooperation that was extended to me during my inspection of the residential properties. 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,



Tammy Bell
Environmental Quality Specialist
Air Quality Division
313-330-0105

Enclosures: Sample Results and Asbestos NESHAP fact sheet

- cc: Annette Switzer, EGLE
- Christopher Ethridge, EGLE
- Brad Myott, EGLE
- Jeremy Howe, EGLE
- Joyce Zhu, EGLE
- Jenine Camilleri, EGLE
- Jason Wolf, EGLE