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Singh Development, L.L.C.  
7125 Orchard Lake Road  
Suite 200  
West Bloomfield, MI 48322

Telephone: (248) 865-1614  
Fax: (248) 865-1630  
todd.rankine@singhmail.com  
www.singhweb.com

August 4, 2023

State of Michigan  
Department of Environment, Great lakes and Energy  
Air Quality Division  
Constitutional Hall  
525 W. Allegan Street  
Lansing, MI 48909-7973

Re: SRN/ID: U472304630; Livingston County

Mr. Dechy:

Pursuant to our phone conversation on August 3, 2023, please accept this letter as the response to the Violation Notice sent by your office on July 24, 2023, in regards to the above-referenced SRN/ID.

The Violation Notice we received indicated that we, as owner and operator of the Faulkwood Shores Golf Course, are liable for neglecting to complete the Notification of Intent to Renovate/Demolish ten (10) days before commencement of the demolition, as required by 40 CFR §61.145(b)(1). Please note the owner and operator entities for the golf course are Faulkwood Shores Singh, LLC as the owner and Links of Novi Singh, LLC as the operator.

Date Violation Occurred:

Approximately 10 days before July 10, 2023.

Explanation of the Causes and Duration of the Violation:

Prior to the start of demolition of the clubhouse, we had applied for and obtained all local permits necessary for demolition. We also contracted with NTH Consultants, Ltd., prior to the commencement of any work on site, to conduct an asbestos survey of the clubhouse structure. NTH published a report dated November 14, 2022, stating that in the 21 bulk samples taken from the property, "no asbestos was detected in the analyzed samples".

We engaged an experience demolition contractor and our agreement required the contractor to furnish any and all notices required by the state and local government. We relied on the contractor to be aware of, and to furnish, any notifications that were necessary to commence the demolition work at the site. After further investigation on our part, it seems the failure to notify The State of Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), was an oversight/miscommunication between us and the demolition contractor and in no way was the lack of notification intentional.

Summary of Actions to Cure the Violation and to Ensure the Violation does not Reoccur:

Once we became aware of the notification requirement, we investigated why the notification had not been completed and immediately took steps to ensure we do not Violate the notification statute again. In order to prevent this oversight from reoccurring on any future demolition projects, we added a separate checklist item to both our Subcontract Agreement, as well as our internal project summary sheet, that specifically states that proof must be provided that notification has been sent to EGLE AQD, prior to the commencement of any demolition work.

We believe the revision of our checklists as described above should prevent any further violations of 40 CFR §61.145(b)(1) on our part and we apologize for the oversight that occurred regarding the demolition at our property. Should you need any further information, please feel free to reach out to me at [Todd.Rankine@singhmail.com](mailto:Todd.Rankine@singhmail.com) or (248) 865-1600.

Sincerely,



Todd J. Rankine  
Director of Architecture and Planning

Cc: Sarwan S. Grewal II  
File