



**NESHAP RENOVATION / DEMOLITION INSPECTION OF  
ASBESTOS CONTAINING MATERIALS  
AND OTHER HAZARDOUS WASTE MATERIALS  
FOR THE PROPERTY KNOWN AS:**

1327 Montgomery  
Muskegon, MI

**Prepared for:**

City of Muskegon  
933 Terrace Street, Room 202  
Muskegon, MI 49440  
1-231-724-6760

**Prepared By:**

ETC - Environmental Services  
38900 Huron River Drive  
Romulus, Michigan 48174  
(734) 955-6600

January 15th, 2016

ETC Job #: 177226

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## 1. Introduction

The City of Muskegon contracted ETC - Environmental Services (ETC) to perform a renovation / demolition inspection of the building located at 1327 Montgomery, Muskegon, MI. This inspection was conducted on January 15th, 2016.

The EPA under the National Emission Standards for Hazardous Air Pollutants (NESHAPs) asbestos rule requires that prior to the start of a renovation and/or demolition project, the building must be inspected for asbestos containing materials (ACM's). The purpose of this inspection was to determine the presence and quantity of friable or potentially friable ACM's. Depending on the ACM found and the condition that it is in, removal of the material may be necessary before demolition work is to begin. Prior to the start of a demolition project, it is necessary that friable or potentially friable ACM's be removed.

ETC's certified inspector, Aaron Yankee and Stuart Yankee, conducted the ACBM inspection and identified materials suspected of containing asbestos. Aaron Yankee and Stuart Yankee's State of Michigan Asbestos Building Inspector's certification number is A-42490 and A-4115.

Wherever potential asbestos materials were found, data was collected and recorded regarding quantities and observed conditions of the suspect material. As required by the Occupational Safety and Health (OSHA) and the Environmental Protection Agency (EPA), three (3) samples of each type of material were taken in different locations to determine actual asbestos content.

Included along with this report are copies of the bulk sample results, a site map showing sample locations and a copy of the State of Michigan Notification of Intent to Renovate/Demolish. This information will be necessary for the asbestos abatement contractor selected to perform asbestos abatement activities in the house. ETC has included its information on the second page.

## 2. Information about Asbestos Inspections

### *a. Sampling Procedures*

Representative bulk samples of suspect asbestos containing building materials were randomly collected within each building area. The materials sampled were broken down into distinct homogenous (similar) materials. Homogenous material determination was based on the following criteria:

- Similar physical characteristics (same color and texture, etc.)
- Application (sprayed-on, troweled-on, assembly into a system etc.)
- Material function (Thermal insulation, floor tile, wallboard system etc.)

It is important to note that some companies are only taking one sample of select non-friable materials. While this procedure is allowed under the NESHAPs regulation, the OSHA standard suggests a minimum of three samples of each

homogeneous material. This is a better approach due the potential errors in the analytical method used. **To provide the most accurate information possible and be sure of our results, ETC chooses to take three samples of each sampled material.**

Additionally, some inspection companies have taken to assuming that materials contain asbestos rather than paying for the time and expenses of sampling them. This is not if the clients best interest. If materials are being assumed to contain asbestos, the client must treat them as asbestos containing even if they are not. This can lead to significantly increased costs for the building owner. **In general, ETC only assumes materials to be asbestos when sampling them will ruin their integrity (i.e. fire doors) or when they are too dangerous to sample (i.e. live electrical lines).**

#### *b. PLM Analysis Methodology*

PLM samples were analyzed utilizing the Environmental Protection Agency's Test Methods: Methods for the determination of Asbestos in Bulk Building Materials (EPA 600/R-93/116, July 1993) and the McCrone Research Institute's The Asbestos Particle Atlas as method references. Additional treatment and tests may be required to accurately define composition (i.e. ashing, extraction, acetone treatment, and TEM).

Analysis was performed by using the bulk sample for visual observation and slide preparation(s) for microscopic examination and identification. The samples analyzed for asbestos (chrysotile, amosite, crocidolite, anthophyllite, and actinolite/tremolite), fibrous non-asbestos constituents (mineral wool, cellulose, etc.) and non-fibrous constituents. Using a stereoscope, the microscopist visually estimated relative amounts of each constituent by determining the volume of each constituent in proportion to the total volume of the sample.

According to NESHAP requirements any bulk sample that has asbestos content above 0% but below 10% should be point counted for final determination of percentage. **Please note, the contract DID NOT include point counting as defined in NESHAP.** Should City of Muskegon wish to have this additional analysis conducted, ETC can send any samples in this range for point counting. However, this will require additional charges for analysis. Therefore, for any samples in the range above 0% but below 10% these results can only be considered estimates.

#### *c. Interpretation of Inspection Results*

A material is considered by OSHA, the EPA and the State of Michigan to be asbestos-containing if at least one sample collected from the homogenous material has asbestos fibers present in a concentration greater than one percent (>1 %).

A summary of the materials sampled, asbestos content, quantities and locations can be found on the Chart A in Section 4.0 – Summary and Conclusions.

*d. Other Hazardous Materials*

Additionally, a chart showing other hazardous materials (above the household quantity limitations) found at the site is included in Chart B – Section 4.0 – Summary and Conclusions. This lists non-asbestos materials that may be hazardous and require special handling and disposal requirements. Items that might be in this category include things like mercury switches, florescent lighting tubes, halogen lights, Freon in refrigeration units, pesticides, herbicides, paints, solvents, etc.

However, under the Resource Conservation and Recovery Act (RCRA) that addresses hazardous wastes, there is residential household quantity exclusion. Therefore, these materials will only be listed in this chart if they are present in quantities larger than what would be expected in a normal household. For instance, if the home was a farm and had a 55 gallon drum of pesticide present, this would be listed in Chart B. On the other hand if there were a few pesticide containers present as would be found in most homes these materials would not be listed.

### **3. Regulatory Requirements**

There are two main regulations that affect renovation / demolition of residential homes and asbestos materials. The MIOSHA asbestos construction standard has requirements to protect the workers performing the renovation / demolition while the EPA – NESHAPs regulation has requirements that protect the general public and environment.

*a. MIOSHA Construction Asbestos Regulations*

The MIOSHA standard establishes a permissible exposure limit (PEL) average over an 8 hour day. This means that this is the maximum level of asbestos that workers and/or employees can be exposed to without respirator protection and protective clothing. Should air sampling during renovation or demolition activities be at or near the PEL the employer will have to:

- Notify Workers
- Worker Training
- Post Danger Signs
- Establish periodic air monitoring regulated areas, and decontamination facilities
- Provide respiratory protection and personnel protective clothing
- Employee Respiration Monitoring
- Record keeping

- Medical Surveillance (if employee will be exposed 30 days per year or more).

Until recently, only schools were federally mandated to conduct asbestos inspections of their buildings. However, with the passage of new MIOSHA regulations, all building owners (in this case City of Muskegon) is now required to notify all renovation / demolition workers of presence, location and quantity of all asbestos containing building materials within the building.

In most cases, it is more practical to have an asbestos contractor removal the ACM from the building prior to renovation / demolition than have the renovation / demolition contractor comply with all these requirements.

*b. NESHAP Requirements*

Prior to beginning a renovation or demolition project, NESHAP (enforced in Michigan by the Department of Environmental Quality – MDEQ) requires a full inspection of the following materials to determine their asbestos content:

- Friable Materials
- Category 1 – Non-friable Materials (Packings, gaskets, resilient floor covering, and asphalt roofing products)
- Category II – Non-friable Materials (All other non-friable materials)

In general, MDEQ requires any identified asbestos materials to be removed prior to renovation or demolition activities that would dislodge, disturb or otherwise affect these materials. There is an exception that if a licensed supervisor will state in writing that the material will not become friable during the renovation / demolition process it may be left in the building. However, be very careful with this exemption. MDEQ has stated that they believe that the only materials that MIGHT qualify for this exemption would be roofing felt and asphalt roofing materials. In order to use even this small exemption, the following would be required from the demolition contractor:

- A licensed asbestos abatement supervisor will sign that the material will not become friable
- The supervisor will have to be on-site during all renovation or demolition to insure that material stays intact.
- If MDEQ reviews that site and finds the material crumbled or disturbed both the contractor and building owner may be cited up to \$27500 per day.
- The waste generated from the activity must be taken to an asbestos dump and they must be informed that the waste is mixed asbestos waste.

It is obviously very expensive and difficult to try and leave ACM within and area / building during renovation or demolition activities. Therefore, ETC recommends that all ACM be removed. This is why ETC does not assume materials to be ACM.

### *c. Notification Requirements*

When performing abatement work within the State of Michigan, notification requirements depend on the quantity of materials and the friability of the material being removed.

If removing friable material above >160 square feet and / or 260 linear feet, the contractor must provide a ten working day notification to Michigan Department of Environmental Quality (MDEQ) and a ten calendar day notification to Michigan Department of Licensing and Regulatory Affairs (LARA) – Asbestos Program. If only non-friable materials are being removed, MDEQ does not want a notification.

If removing above >15 square feet but < 160 square feet, or > 10 linear feet but < 260 linear feet the contractor only needs to notify the LARA as stated above.

For removals of < 15 square feet or < 10 linear feet, not notification is required.

In conjunction with any notification to LARA, the contractor must pay a 1% fee for the project. This fee is to reflect 1% of the total abatement contract amount.

### *d. Abatement Requirements*

Any company hired to remove identified ACM must insure that all asbestos companies, supervisors, workers are be licensed by the LARA. Additionally, these companies must insure that:

- The State of Michigan must be notified of the work in advance
- An asbestos supervisor must be on-site at all times when work is occurring
- All work must be completed within regulated work areas
- All work must be completed utilizing asbestos work practices defined in the MIOSHA regulations
- Have on-site personnel sampling conducted during the removal activities
- The contractor must request and pass (below 0.05 f/cc) a final asbestos clearance performed by a neutral third party prior to dismantling and leaving the site.
- Meet all other current regulations and standards.

In addition to these requirements, ETC strongly recommends that City of Muskegon insure that they receive the following documents from the contractor prior to making final payment:

- Written / signed documentation from the supervisor if any asbestos materials are to be left in place during renovation or demolition (Not recommended)
- Copy of the asbestos abatement notification
- Copy of the personnel monitoring during the work

- Copy of the final asbestos clearance report

By requiring these documents, City of Muskegon will substantially reduce their liability should something occur during the asbestos removal at this site.

#### 4. Summary and Conclusions

***ETC has endeavored to identify potential asbestos containing materials (ACM) that were accessible (without destructive testing) at the time of the inspection, other potential ACM may be buried or inaccessible at the time of the initial survey.***

***As has been evidenced on numerous other demolition and renovation projects, when tearing out or demolishing existing building surfaces, it is very common to encounter other building materials that were not accessible during the initial testing for ACM or lead / cadmium painted surfaces. It is therefore incumbent on City of Muskegon or their selected construction / renovation contractor to refer to the chart of sampled materials consistently during the renovation process. If materials are encountered during this process that are not clearly identifiable on the initial survey chart, ETC should be called to test and verify the asbestos / lead / cadmium content of these items.***

***ETC cannot be held responsible for materials encountered after the initial survey is completed unless we are contacted and given the opportunity to test and verify the material content. The costs associated with this additional testing are not included within the scope of this project and will incur additional charges for the additional sampling and analysis.***

On the following charts, please find:

- Chart A - Is a summary of the materials that were sampled. Materials that test positive for asbestos have been bolded to make identification easier. ***If additional materials are encountered that were not previously identified, the contractor is responsible to contact ETC and have these materials tested. These additional sampling costs are not included in the scope of work or price for this survey.***

Quantities that are listed are estimates only; in general, listed quantities represent only what was visible during testing. It is likely that where ACM has been identified throughout specific floors, similar materials and quantities exist on other like floors. It is the contractors'/client's responsibility to verify all amounts of asbestos identified during any bid process, or during future renovation and/or demolition activities. Materials that are identical in both relative location and physical description to already tested materials listed in this report should always be assumed to be ACM.

- Chart B – Is a list of other hazardous materials (above RCRA household quantity levels) that will require special handling and disposal by the contractor.

<b>Chart A – Materials Sampled and Asbestos Content</b>				
<b>Material #</b>	<b>Material Description</b>	<b>Asbestos</b>	<b>Quantity</b>	<b>Location (Refer to map in Appendix B)</b>
1	Plaster, grey, lathe coat. Grey plaster. White finish.	No	5,200 SF	Rooms 2,3,4,5,6,7,9,10
<b>2</b>	<b>Duct Insulation, grey paper.</b>	<b>Yes</b>	<b>5 Runs 25 SF</b>	<b>Rooms 2, 3,5,6,9,11</b>
3	Boiler Insulation, Grey Cement	No	100 SF	Basement
4	Drywall/Board, white.	No	400 SF	Room 2
5	Seam Tape , White	No	400 SF	Room 2
6	Mud/Joint compound, White	No	400 SF	Room 2
7	Linoleum, cream/blue. Stone Pattern.	No	85 SF	Room 1
8	Linoleum, cream	No	40 SF	Room 5
9	Linoleum, tan w/ black/red pattern.	No	250 SF	Room 9, 10
10	Linoleum , grey with cloth	No	20 SF	Room 10
11	Chimney Cement, stack connection	No	2 SF	Room 11
12	Window Glazing, White	No	42 Units	Exterior
13	House Wrap, black paper	No	2,700 SF	Exterior
14	Roof Shingles, black	No	2,900 SF	Exterior

**Chart B – Other Hazardous Materials Located**  
(Above the household quantity Limitations)

Material #	Material Description	Quantity	Location
1	Air conditioner/freezer/refrigerators	4	Basement 11
2	Stereo and TV	2	Living Room 2
3	Cleaners, bug killer, aerosol cans.	25	Attic, Basement
4	Thermostats	1	Living Room 2
5	Tires	4	Garage 14
6	Concrete Patching Mix	1	Basement 11
7	Propane Fuel	2	Basement 11
8	Gas Can	1, 4 gallon	Interior Garage
9	Roof Cement,	2	Interior Garage and Basement

**5. Inspector's Information**

All inspection work was completed by a Michigan certified asbestos abatement inspector as detailed below.

This report reviewed and submitted by:



Aaron Yankee and Stuart Yankee  
State of Michigan Certified Asbestos Building Inspector  
State of Michigan Card #: A-42490 and A-4115

# **APPENDICES**

## **APPENDIX A**

# **POLARIZED LIGHT MICROSCOPY ASBESTOS ANALYSIS RESULT FORMS**

# ENVIRONMENTAL TESTING LABORATORIES, INC.



38900 HURON RIVER DRIVE, SUITE 200  
ROMULUS, MICHIGAN 48174  
(734) 955-6600  
FAX: (734) 955-6604

## REVISED REPORT

To : Environmental Testing And Consulting Inc.  
38900 Huron River Drive  
Romulus, MI 48174

Project Location : Vacant Residence  
1327 Montgomery, Muskegon, MI

Attention : Samantha Ferguson

Client Project : N/A

ETC Job : 177226

Report Date : 1/20/2016

Login #	Sample ID	Work Requested	Completed
388594	01A	Asbestos Analysis	01/20/2016
388595	01B	Asbestos Analysis	01/20/2016
388596	01C	Asbestos Analysis	01/20/2016
388597	01D	Asbestos Analysis	01/20/2016
388598	01E	Asbestos Analysis	01/20/2016
388599	01F	Asbestos Analysis	01/20/2016
388600	01G	Asbestos Analysis	01/20/2016
388601	02A	Asbestos Analysis	01/20/2016
388602	02B	Asbestos Analysis	01/20/2016
388603	02C	Asbestos Analysis	01/20/2016
388604	03A	Asbestos Analysis	01/20/2016
388605	03B	Asbestos Analysis	01/20/2016
388606	03C	Asbestos Analysis	01/20/2016
388607	04A	Asbestos Analysis	01/20/2016
388608	04B	Asbestos Analysis	01/20/2016
388609	05A	Asbestos Analysis	01/20/2016
388610	05B	Asbestos Analysis	01/20/2016
388611	06A	Asbestos Analysis	01/20/2016
388612	06B	Asbestos Analysis	01/20/2016
388613	07A	Asbestos Analysis	01/20/2016

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Login #	Sample ID	Work Requested	Completed
388614	07B	Asbestos Analysis	01/20/2016
388615	08A	Asbestos Analysis	01/20/2016
388616	08B	Asbestos Analysis	01/20/2016
388617	09A	Asbestos Analysis	01/20/2016
388618	09B	Asbestos Analysis	01/20/2016
388619	10A	Asbestos Analysis	01/20/2016
388620	10B	Asbestos Analysis	01/20/2016
388621	11A	Asbestos Analysis	01/20/2016
388622	11B	Asbestos Analysis	01/20/2016
388623	12A	Asbestos Analysis	01/20/2016
388624	12B	Asbestos Analysis	01/20/2016
388625	13A	Asbestos Analysis	01/20/2016
388626	13B	Asbestos Analysis	01/20/2016
388627	14A	Asbestos Analysis	01/20/2016
388628	14B	Asbestos Analysis	01/20/2016

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Reviewed by:



Quality Assurance Coordinator

## Polarized Light Microscopy Asbestos Analysis Report

**To :** Environmental Testing And Consulting Inc.  
 38900 Huron River Drive  
 Romulus, MI 48174  
**Location :** Vacant Residence  
 1327 Montgomery, Muskegon, MI

**ETC Job :** 177226  
**Client Project :** N/A  
**Date Collected :** 01/15/2016  
**Date Received :** 01/19/2016  
**Date Analyzed :** 01/20/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
388594 01A LR 2-N Ceiling Layer-1 Analyst: Alex Vande Guchte	Plaster	Grey Non-Fibrous Homogenous	5% Cellulose	95% Other	None Detected
Only 2 Testable Layers Found On All Plaster Samples					
388594 01A LR 2-N Ceiling Layer-2 Analyst: Alex Vande Guchte	Skim Coat	White Non-Fibrous Homogenous		100% Other	None Detected
388595 01B BR 3-Ceiling Layer-1 Analyst: Alex Vande Guchte	Plaster	Grey Non-Fibrous Homogenous	5% Cellulose	95% Other	None Detected
388595 01B BR 3-Ceiling Layer-2 Analyst: Alex Vande Guchte	Skim Coat	White Non-Fibrous Homogenous		100% Other	None Detected
388596 01C Bath 5-Ceiling Layer-1 Analyst: Alex Vande Guchte	Plaster	Grey Non-Fibrous Homogenous	5% Cellulose	95% Other	None Detected
388596 01C Bath 5-Ceiling Layer-2 Analyst: Alex Vande Guchte	Skim Coat	White Non-Fibrous Homogenous		100% Other	None Detected

## Polarized Light Microscopy Asbestos Analysis Report

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 38900 Huron River Drive  
 Romulus, MI 48174  
**Location :** Vacant Residence  
 1327 Montgomery, Muskegon, MI

**ETC Job :** 177226  
**Client Project :** N/A  
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**Date Received :** 01/19/2016  
**Date Analyzed :** 01/20/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
388597 01D BR 6 Layer-1 Analyst: Alex Vande Guchte	Plaster	Grey Non-Fibrous Homogenous	1% Cellulose	99% Other	None Detected
388597 01D BR 6 Layer-2 Analyst: Alex Vande Guchte	Skim Coat	White Non-Fibrous Homogenous		100% Other	None Detected
388598 01E Attic Stairs 7-E Wall Layer-1 Analyst: Alex Vande Guchte	Plaster	Grey Non-Fibrous Homogenous	5% Cellulose	95% Other	None Detected
388598 01E Attic Stairs 7-E Wall Layer-2 Analyst: Alex Vande Guchte	Skim Coat	White Non-Fibrous Homogenous		100% Other	None Detected
388599 01F KN 9-Ceiling Layer-1 Analyst: Alex Vande Guchte	Plaster	Grey Non-Fibrous Homogenous	2% Cellulose	98% Other	None Detected
388599 01F KN 9-Ceiling Layer-2 Analyst: Alex Vande Guchte	Skim Coat	White Non-Fibrous Homogenous		100% Other	None Detected

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 38900 Huron River Drive  
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Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
388600 01G Bsmt Stairs 10-E Wall Layer-1 Analyst: Alex Vande Guchte	Plaster	Grey Non-Fibrous Homogenous	1% Cellulose	99% Other	None Detected
388600 01G Bsmt Stairs 10-E Wall Layer-2 Analyst: Alex Vande Guchte	Skim Coat	White Non-Fibrous Homogenous		100% Other	None Detected
388601 02A LR 2-S Wall Analyst: Alex Vande Guchte	Paper Duct Insulation	Grey Fibrous Homogenous	75% Cellulose		25% Chrysotile
388602 02B BR 6- N Wall Analyst: Alex Vande Guchte		Not Analyzed			
388603 02C Bsmt- Boiler Duct Analyst: Alex Vande Guchte		Not Analyzed			
388604 03A Bsmt-Boiler Analyst: Alex Vande Guchte	Cementitious Boiler Insulation	Grey Non-Fibrous Homogenous		100% Other	None Detected
388605 03B Bsmt-Boiler Analyst: Alex Vande Guchte	Cementitious Boiler Insulation	Grey Non-Fibrous Homogenous		100% Other	None Detected

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Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
388606 03C Bsmt-Boiler Analyst: Alex Vande Guchte	Cementitious Boiler Insulation	Grey Non-Fibrous Homogenous		100% Other	None Detected
388607 04A LR 2-Ceiling Analyst: Alex Vande Guchte	Drywall	White Non-Fibrous Homogenous	5% Cellulose	95% Other	None Detected
388608 04B LR 2-Ceiling Analyst: Alex Vande Guchte	Drywall	White Non-Fibrous Homogenous	2% Cellulose	98% Other	None Detected
388609 05A LR 2-Ceiling Analyst: Alex Vande Guchte	Seam Tape	White Fibrous Homogenous	100% Cellulose		None Detected
388610 05B LR 2-Ceiling Analyst: Alex Vande Guchte	Seam Tape	White Fibrous Homogenous	100% Cellulose		None Detected
388611 06A LR 2-Ceiling Analyst: Alex Vande Guchte	Mud/Joint Compound	White Non-Fibrous Homogenous	2% Cellulose	98% Other	None Detected
388612 06B LR 2-Ceiling Analyst: Alex Vande Guchte	Mud/Joint Compound	White Non-Fibrous Homogenous	4% Cellulose	96% Other	None Detected

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**Date Analyzed :** 01/20/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
388613 07A Enclosed Porch 1 Analyst: Alex Vande Guchte	Stone Pattern Linoleum	Cream/Blue Fibrous Homogenous	100% Cellulose		None Detected
388614 07B Enclosed Porch 1 Analyst: Alex Vande Guchte	Stone Pattern Linoleum	Cream/Blue Fibrous Homogenous	100% Cellulose		None Detected
388615 08A Bath 5 Analyst: Alex Vande Guchte	Linoleum	Cream Fibrous Homogenous	70% Cellulose	30% Other	None Detected
388616 08B Bath 5 Analyst: Alex Vande Guchte	Linoleum	Cream Fibrous Homogenous	70% Cellulose	30% Other	None Detected
388617 09A KN 9 Analyst: Alex Vande Guchte	Linoleum	Tan/Black/Red Fibrous Homogenous	70% Cellulose	30% Other	None Detected
388618 09B KN 9 Analyst: Alex Vande Guchte	Linoleum	Tan/Black/Red Fibrous Homogenous	70% Cellulose	30% Other	None Detected
388619 10A Bsmt Stairs 10 Analyst: Alex Vande Guchte	Linoleum	Grey Fibrous Homogenous	100% Cellulose		None Detected

ETL, Inc. maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced without written approval by ETL, Inc. Test Method EPA 600/R-93-116 & EPA 600/M4-82/020 or NYSDOH-ELAP item 198.1 and/or 198.6 was used to analyze all samples. Matrix interference and/or resolution limits (i.e. detecting asbestos in non-friable organically bound materials) may yield false results in certain circumstances. Quantitative transmission electron microscopy (TEM) is currently the only method that can pronounce materials as non-asbestos containing. Interpretation and use of test results are the responsibility of the client. ETL, Inc. is not responsible for the accuracy of the results when requested to physically separate and analyze layered samples. Any PLM results below 10% should be re-analyzed using the EPA recommended Point Count method. Any material that has greater than 1% asbestos content is considered to be an Asbestos Containing Material (ACM). These materials are regulated by both OSHA and the EPA and must be treated accordingly. Results are related to only to samples that were tested.

## Polarized Light Microscopy Asbestos Analysis Report

**To :** Environmental Testing And Consulting Inc.  
 38900 Huron River Drive  
 Romulus, MI 48174  
**Location :** Vacant Residence  
 1327 Montgomery, Muskegon, MI

**ETC Job :** 177226  
**Client Project :** N/A  
**Date Collected :** 01/15/2016  
**Date Received :** 01/19/2016  
**Date Analyzed :** 01/20/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
388620 10B Bsmt Stairs 10 Analyst: Alex Vande Guchte	Linoleum	Grey Fibrous Homogenous	100% Cellulose		None Detected
388621 11A Bsmt At Stack 11 Analyst: Alex Vande Guchte	Chimney Cement (stack connection)	Grey Non-Fibrous Homogenous		100% Other	None Detected
388622 11B Bsmt At Stack 11 Analyst: Alex Vande Guchte	Chimney Cement (stack connection)	Grey Non-Fibrous Homogenous		100% Other	None Detected
388623 12A Ext N Side House Analyst: Alex Vande Guchte	Window Glazing	White Non-Fibrous Homogenous	70% Cellulose	30% Other	None Detected
388624 12B Ext W Side Garage Analyst: Alex Vande Guchte	Window Glazing	White Non-Fibrous Homogenous	80% Cellulose	20% Other	None Detected
388625 13A Ext N Analyst: Alex Vande Guchte	Paper House Wrap	Black Fibrous Homogenous	2% Cellulose	98% Other	None Detected
388626 13B Ext SE Analyst: Alex Vande Guchte	Paper House Wrap	Black Fibrous Homogenous	4% Cellulose	96% Other	None Detected

**Polarized Light Microscopy Asbestos Analysis Report**

**To :** Environmental Testing And Consulting Inc.  
 38900 Huron River Drive  
 Romulus, MI 48174  
**Location :** Vacant Residence  
 1327 Montgomery, Muskegon, MI

**ETC Job :** 177226  
**Client Project :** N/A  
**Date Collected :** 01/15/2016  
**Date Received :** 01/19/2016  
**Date Analyzed :** 01/20/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
388627 14A House Ext SE Cmn Analyst: Alex Vande Guchte	Roof Shingle	Black Non-Fibrous Homogenous	7% Cellulose	93% Other	None Detected
388628 14B Garage Ext SW Cmn Analyst: Alex Vande Guchte	Roof Shingle	Black Non-Fibrous Homogenous	4% Cellulose	96% Other	None Detected



Lab Supervisor/Other Signatory



Analyst: Alex Vande Guchte

400 Point Count Results by EPA 600/R-93/116 PLM (denoted by "PC")  
 Item 198.1: PLM Methods for Identifying and Quantitating Asbestos in Bulk Samples  
 Item 198.6: PLM Methods for Identifying and Quantitating Asbestos in Non-Friable Organically Bound Bulk Samples  
 EPA 600/R-93/116: Method for Determination of Asbestos in Bulk Building Materials  
 EPA 600/M4-82-020: Interim Method for Determination of Asbestos in Bulk Insulation Samples

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# Asbestos Material Sampling Summary Sheet

## Surfacing materials

3500

Revision date 5/7/2015

Job #:	Building: 1327 Montgomery Ave Muskegon			Date: 1-15-16			
Material no.	Material Description	Friable (F) / Non-Friable (NF)	Sample Letter	Sample Location	Material Located throughout bldg (Please List all Rooms)	Quantity	Picture #
01	Material: PLASTER	F	A	LIVING RM 2 - North ceiling	2,3,4,5 6,7, <del>8</del> 9,10	5200 SF	388594 388595 388596 388597 388598 388599 388600
	3 Layers		B	BED 3 - ceiling			
	GRAY LATHE COAT		C	BATH 5 - ceiling			
	GRAY PLASTER		D	BED 6 -			
	WHITE FINISH		E	ATTIC STAIRS 7 - EAST WALL			
			F	KITCHEN 9 - ceiling			
			G	BSMT STAIR 10 - EAST WALL			
	Material:						
	Material:						

.000 SF = 3 samples

1000 - <5000 = 5 samples

>5000 = 7 samples

**Asbestos Material Sampling Summary Sheet**  
**TSI (Thermal System Insulation) materials**

Revision date 5/7/2015

Job #: 177226 Building: 1327 Montgomery, Muskogee Date: 1-1

Material no.	Material Description	Friable (F) / Non-Friable (NF)	Sample Letter	Sample Location	Material Located throughout bldg (Please List all Rooms)	Quantity	Picture #	
02	Material: DUCT INSULATION	F	A	LIVING 2 SWALL BOOT	2,3,5, 6,9,11	6-runs 250 SF	388601	
	Description: GRAY PAPER		B	BED 6 - N WALL BOOT				388602
			C	BASEMENT - BOILER DUCT				388603
03	Material: BOILER INSULATION	F	A	BASEMENT - BOILER TOP	BASEMENT	100 SF	388604	
	Description: GRAY CEMENTIOUS		B					388605
			C					388606
	Material:							
	Description:							
	Material:							
	Description:							
	Material:							
	Description:							
	Material:							
	Description:							

3 samples with the exception of patches less than 6 LF or 6 SF, then only 1 sample

**Asbestos Material Sampling Summary Sheet**  
Miscellaneous materials

Revision date 5/7/2015

Job #: 177224		Building: 1327 Montgomery Ave Muskogee			Date: 1-15-6		
Material no.	Material Description	Friable (F) / Non-Friable (NF)	Sample Letter	Sample Location	Material Located throughout bldg (Please List all Rooms)	Quantity	Picture #
04	Material: DRYWALL / BOARD	F	A	LIVING - 2 ceiling	2	400 SF	388607
	Description: white		B	LIVING - 2 ceiling			388608
05	Material: SEAM TAPE	F	A	7 7 7	2	7	388609
	Description: WHITE		B				388610
06	Material: MUD / JOINT COMPOUND	F	A	7 7 7	2	7	388611
	Description: WHITE		B				388612
07	Material: LINOLEUM	F	A	ENCLOSED PORCH - 1	1	85 SF	388613
	Description: CREAM / BLUE STONE PATTERN		B	2 2			388614
08	Material: LINOLEUM	F	A	BATH 5	5	40 SF	388615
	Description: CREAM		B	BATH 5			388616
09	Material: LINOLEUM	F	A	KITCHEN 9	9, 10	250 SF	388617
	Description: TAN W/ BL BLK RED PATTERN		B	KITCHEN 9			388618
10	Material: LINOLEUM	F	A	BASEMENT STAIRS 10	10	20 SF	388619
	Description: GRAY WITH CLOTH		B	5 5 2			388620
11	Material: CHIMNEY CEMENT	NF	A	BASEMENT @ STACK 11	11	2 SF	388621
	Description: STACK CONNECTN		B	5 5			388622
12	Material: WINDOW GLAZING	F	A	EXT NORTH SIDE HOUSE	EXT	42 UNITS	388623
	Description: WHITE		B	EXT WEST SIDE GARAGE			388624
13	Material: HOUSE WRAP	F	A	EXT NORTH	EXT	2,700 SF	388625
	Description: BLACK PAPER		B	EXT SEAST			388626

~~14~~ roof

A - HOUSE  
B - GARAGE  
2 samples

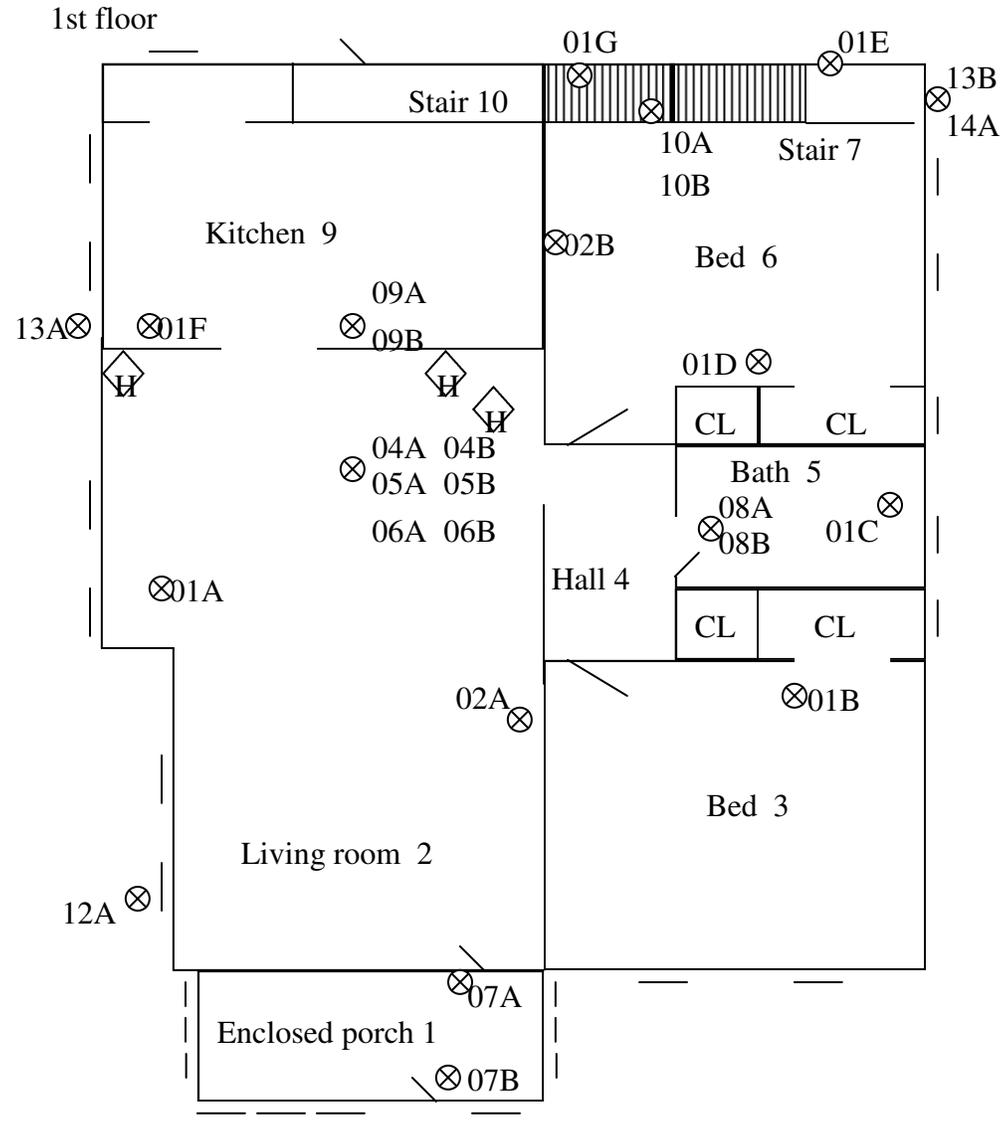
**Asbestos Material Sampling Summary Sheet**  
**Miscellaneous materials**

Revision date 5/7/2015

Job #: 177226		Building: 1327 MONTGOMERY AVE MUSKEGON			Date: 1-15-16		
Material no.	Material Description	Friable (F) / Non-Friable (NF)	Sample Letter	Sample Location	Material Located throughout bldg (Please List all Rooms)	Quantity	Picture #
14	Material: ROOF SHINGLES	NF	A	HOUSE EXT SE CORNER	EXT	2,900 SF	388627
	Description: BLACK		B	GARAGE EXT SW CORNER	HSE GARAGE		
	Material:						
	Description:						
	Material:						
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	Material:						
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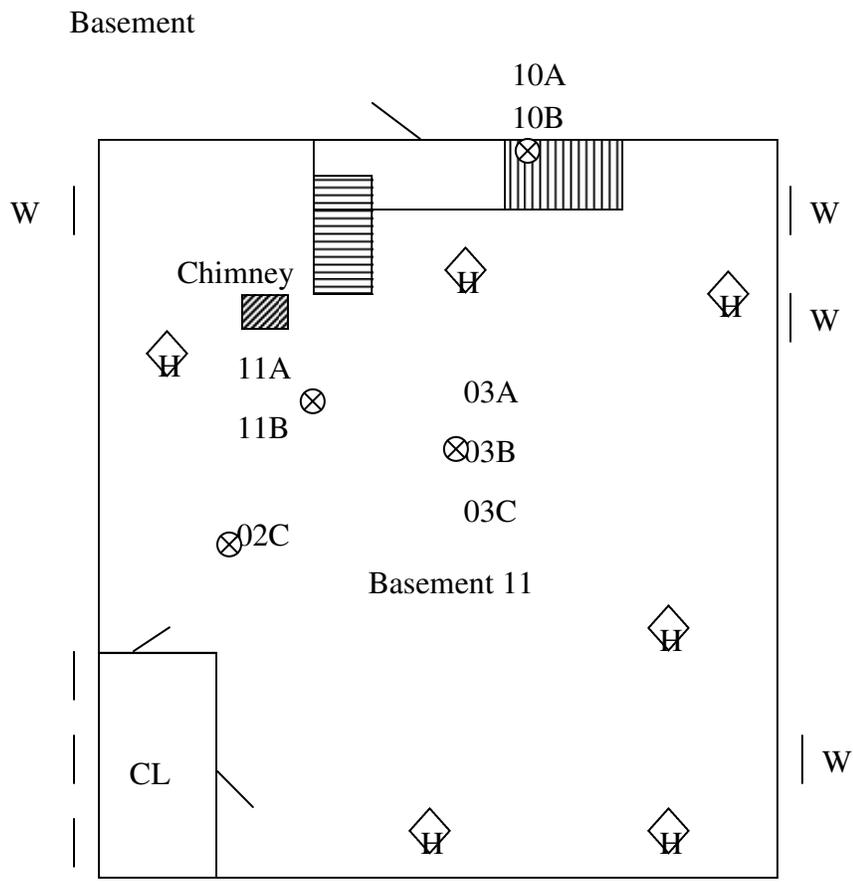
# **APPENDIX B**

## **SITE MAP**



Please Note: This is a rough floor plan only. All items, (doorways, Windows, etc.) may not be included in this illustration. Also, room and component sizes are not drawn to scale.





Please Note: This is a rough floor plan only. All items, (doorways, Windows, etc.) may not be included in this illustration. Also, room and component sizes are not drawn to scale.





**APPENDIX C**

**PHOTOGRAPHS**



Front of House



Side B



Back of House



Side D



Hazard: refrigerator



Hazard :Freezer



Hazard : Stereo



Hazard, Television.



Hazard : Cleaners



Hazard : Bug Killer



Hazard: Aerosol's



Hazard : Aerosols and cleaners



Hazard: Paint Can's



Hazard :Paint Can's



Hazard : Paint Can's



Hazard: Paint Can's



Hazard: Paint Can's



Hazard :Paint Can's



Hazard : Paint Can's



Hazard: Aerosol



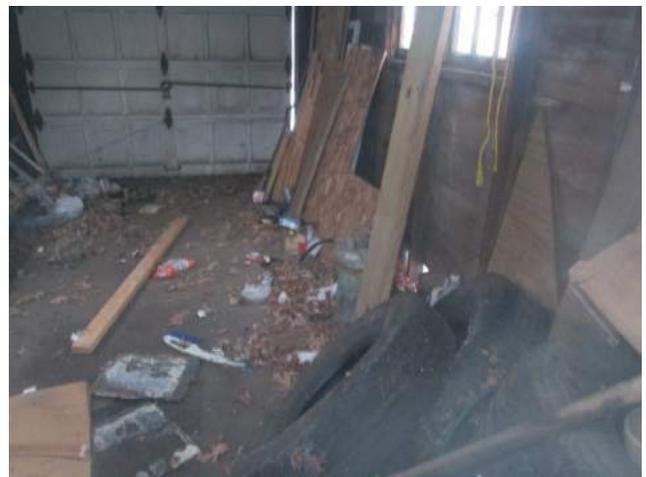
Hazard: Thermostat



Hazard :Concrete Patching.



Hazard : Propane tanks



Hazard: Gas Can



Hazard: Roof Cement

## **APPENDIX D**

# **STATE OF MICHIGAN NOTIFICATION OF INTENT TO REMOVE/DEMOLISH**

# NOTIFICATION OF INTENT TO RENOVATE/DEMOLISH



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
(MDEQ) AIR QUALITY DIVISION  
NESHAP, 40 CFR Part 61, Subpart M



MICHIGAN DEPARTMENT OF LICENSING AND  
REGULATORY AFFAIRS (LARA), ASBESTOS PROGRAM,  
P.A. 135 OF 1986, AS AMENDED, Section 220 (1-4) or (8)

### DEQ/LARA USE ONLY

Postmark Date \_\_\_/\_\_\_/\_\_\_ Rec'd Date \_\_\_/\_\_\_/\_\_\_  
 Emergency Date \_\_\_/\_\_\_/\_\_\_ Valid No. \_\_\_\_\_  
 OK  Send Def Ltr. Date of Def Ltr. \_\_\_/\_\_\_/\_\_\_  
 FOLLOW UP \_\_\_/\_\_\_/\_\_\_ Spoke w/ \_\_\_\_\_  
 Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 Notification No. \_\_\_\_\_ Trans No. \_\_\_\_\_

**Calculate LARA Asbestos Project Fee:** (1% Project Fee)  
 Total Project Cost: \_\_\_\_\_ x 0.01 = \_\_\_\_\_  
 Type of Contractor: \_\_\_\_\_ License No.: \_\_\_\_\_  
 Licensing Authority: \_\_\_\_\_

**1. NOTIFICATION:**  
 Date of Notification: \_\_\_\_\_  
 Date of Revision(s): \_\_\_\_\_  
 Notification Type:  Original  Revised  Canceled  Annual  
**Mark appropriate boxes: (both DEQ and LARA may apply):**  
**DEQ (NESHAP) [260 In. ft./160 sq. ft. or more is threshold]**  
 Planned Renovation – 10 working days notice  
 Emergency Renovation  
 Scheduled Demolition – 10 working days notice  
 Intentional Burn – 10 working days notice  
 Ordered Demolition  
**LARA (MIOSHA) [Will not accept annual notifications]**  
 Demo, Reno, Encap. (>10 In. ft./15 sq. ft.) 10 calendar days notice  
 Emergency Renovation/Encapsulation

**2. PROJECT SCHEDULE:**

	START DATE	END DATE
* Renovation	_____	_____
+Asb. Removal	_____	_____
+Demolition:	_____	_____
Encapsulation:	_____	_____

**Work Schedule:** Please indicate the anticipated days of the week and work hours for the purpose of scheduling a compliance inspection.

	Days of the Week	Work Hours
Asb. Removal:	_____	_____
Demolition:	_____	_____
Encapsulation:	_____	_____

\* Includes setup, build enclosure, asbestos removal, demobilizing, etc.  
 +Include only those dates you are conducting asbestos removal/demo.  
 Check here if this is a multi-phased project, attach a schedule showing the start/end date of each phase.

**3. ABATEMENT CONTRACTOR:** Internal Project #: \_\_\_\_\_  
 Name: \_\_\_\_\_  
 Mailing Address: \_\_\_\_\_  
 City/State/Zip: \_\_\_\_\_  
 E-mail: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Phone: \_\_\_\_\_

**4. DEMOLITION CONTRACTOR:** Internal Project #: \_\_\_\_\_  
 Name: \_\_\_\_\_  
 Mailing Address: \_\_\_\_\_  
 City/State/Zip: \_\_\_\_\_  
 E-mail: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Phone: \_\_\_\_\_

**5. FACILITY OWNER:** ("Facility" includes Bridges)  
 Name: \_\_\_\_\_  
 Mailing Address: \_\_\_\_\_  
 City/State/Zip: \_\_\_\_\_  
 E-mail: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Phone: \_\_\_\_\_

**6. FACILITY DESCRIPTION:**  
 Facility Name: \_\_\_\_\_  
 Location Address/Description: \_\_\_\_\_  
 \_\_\_\_\_ If Apt. # of units: \_\_\_\_\_  
 City/Twp. \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
 County: \_\_\_\_\_ Nearest Crossroad: \_\_\_\_\_  
 Size: (sq. ft.) \_\_\_\_\_ No. of Floors: \_\_\_\_\_ Floor No.: \_\_\_\_\_  
 Age: \_\_\_\_\_ Present Use: \_\_\_\_\_ Prior Use: \_\_\_\_\_  
 Specific Location(s) in Facility: \_\_\_\_\_

**7. DISPOSAL SITE:**  
 Name: \_\_\_\_\_  
 Location Address: \_\_\_\_\_  
 City/State/Zip: \_\_\_\_\_

8. WASTE TRANSPORTER 1:	WASTE TRANSPORTER 2:
Name: _____	_____
Address: _____	_____
City/State/Zip: _____	_____
Phone: _____	_____

**9. ORDERED DEMOLITIONS:** (See NESHAP regulations for definition of "Ordered Demolition.") A copy of the official Order must accompany this notification.  
 Gov't Agency Ordering Demo: \_\_\_\_\_  
 Name/Title of Person Signing Order: \_\_\_\_\_  
 \_\_\_\_\_  
 Date of Order: \_\_\_\_\_ Date Ordered to Begin: \_\_\_\_\_

**10. IS ASBESTOS PRESENT?**  Yes  No  To be removed prior to demolition

**Estimate the amount of asbestos:** Include RACM (Regulated Asbestos Containing Material) to be removed, encapsulated, etc. Also include the amount and type (floor tile, roofing, etc.) of non-friable Category I and/or Category II ACM that will not be removed prior to demolition. (NOTE: In a demolition, cementitious ACM cannot remain in a structure, as it is likely to become regulated in the demolition/handling process. It must be removed prior to demolition.)

RACM to be Removed	RACM to be Encapsulated	Non-friable ACM <u>not</u> removed prior to demo.		Units of Measure	
		Category I	Category II	Ln. Ft.	Ln. M.
_____	_____	_____	_____	<input type="checkbox"/> Sq. Ft.	<input type="checkbox"/> Sq. M.
_____	_____	_____	_____	<input type="checkbox"/> Cu. Ft.*	<input type="checkbox"/> Cu. M.*

\*Volume (cubic ft./meters) should be used only if unable to measure by linear/square measure (example: asbestos has fallen off of surface).

(continued on reverse side)

**NOTIFICATION OF INTENT TO RENOVATE/DEMOLISH (continued)**

**11. PROJECT DESCRIPTION: Complete A) for Renovation (asbestos removal/encapsulation) and/or B) for Demolition:**

**A) RENOVATION: Mark all surfaces/types of RACM to be removed:**

- Piping     Fittings     Boiler(s)     Tanks(s)  
 Beam(s)     Duct(s)     Tunnel(s)     Ceiling Tile(s)  
 Mag Block     Other (describe) \_\_\_\_\_

**Encapsulation (for LARA): Mark surfaces/types to be encapsulated:**

- Piping     Fittings     Boiler(s)     Tank(s)  
 Beam(s)     Duct(s)     Tunnel(s)     Ceiling Tile(s)  
 Other (describe) \_\_\_\_\_

**Method of removal:** Describe how the asbestos will be removed from the surface (example: glove bag, scrape with hand tools, cut in sections and carefully lower, etc.): \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**B) DEMOLITION:** Describe the method of demolition of facility, bridge, etc., and indicate if complete or partial. If partial, describe which part of facility bridge, etc., will be demolished: \_\_\_\_\_  
 \_\_\_\_\_

**12. ENGINEERING CONTROLS:** Describe work practices and engineering controls used to prevent visible emissions before, during, and after removal, and until proper disposal: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**13. UNEXPECTED ASBESTOS:** Describe the steps you intend to follow in the event that unexpected RACM is found or previously non-friable asbestos becomes friable (crumbled, pulverized, reduced to powder, etc.) and therefore regulated: \_\_\_\_\_  
 \_\_\_\_\_

**14. PROCEDURE(S) USED TO DETECT THE PRESENCE OF ASBESTOS: A)** Indicate how you determined whether or not asbestos is in the facility. If analytical sampling was used, describe method of analysis. (The determination of the presence or absence of asbestos must be made prior to submitting a renovation/demolition notification.): \_\_\_\_\_  
 \_\_\_\_\_

**B)** Name, address, and phone number of company performing asbestos survey: \_\_\_\_\_

**C)** Name, accreditation number of inspector, and date of inspection: \_\_\_\_\_

**15. EMERGENCY RENOVATIONS:** Date/time of emergency: \_\_\_\_\_ Describe the sudden, unexpected event: \_\_\_\_\_  
 \_\_\_\_\_

Explain how the event caused unsafe conditions, and/or would cause equipment damage and/or an unreasonable financial burden: \_\_\_\_\_  
 \_\_\_\_\_

**16.** I certify that an individual trained in the provisions of 40 CFR Part 61, Subpart M, will be on-site during the renovation and during demolition involving RACM above the threshold and/or during an ordered demolition. Evidence that this person has completed the required training will be available for inspection at the renovation or demolition site.

\_\_\_\_\_  
*Signature of Owner or Abatement Contractor      Date*

\_\_\_\_\_  
*Signature of Owner or Demolition Contractor      Date*

**17. Signature Requirements for Projects with Negative Pressure Enclosures: (required by LARA)**  
 Per Section 221(1)(2) of P.A. 135 of 1986, as amended, clearance air monitoring is required for any asbestos abatement project involving 10 linear feet/15 square feet or more of friable material which is performed within a negative pressure enclosure. *I (the building owner or lessee) have been advised by the contractor of my responsibility under Act 135 to have clearance air monitoring performed on this project.*

\_\_\_\_\_  
*Signature of Building Owner or Lessee      Date*

\_\_\_\_\_  
*Signature of Asbestos Abatement Contractor Representative      Date*

**NOTE:** It is not mandatory that a signed copy be sent to LARA unless requested. For affected projects, this section of the notification form must be completed, signed, and made part of your records before the project begins.

**18. I certify that the above information is correct:**

\_\_\_\_\_  
*Printed Name of Owner/Operator      Date*

\_\_\_\_\_  
*Signature of Owner/Operator      Date*

**MAILING ADDRESSES/PHONE NUMBERS:** (See Item 1 to determine which agency requirements/regulations are applicable to your project.)

For **Public Act 135 of 1986, as amended, Section 220 (1-4) or (8)**, mail to address below. For more info visit: <http://www.michigan.gov/asbestos>

MIOSHA Asbestos Program  
 LARA, CSHD  
 P.O. Box 30671  
 Lansing, MI 48909-8171

517.636.4551 (office), 517.322.1713 (fax)

For **NESHAP Demolitions/Renovations, 40 CFR, Part 61, Subpart M**, mail notifications to the appropriate address below (by county of subject facility): For more info visit <http://www.michigan.gov/deq> click on Air, then Asbestos NESHAP Program.

**All Counties (except Wayne County)**

NESHAP Asbestos Program  
 DEQ, AQD  
 P.O. Box 30260  
 Lansing, MI 48909-7760

517.241.7463 (Office)  
 517.373.7064 (Revision Line)

**Wayne County Only**

NESHAP Asbestos Program  
 Detroit Field Office, DEQ, AQD  
 Cadillac Place, Suite 2-300  
 3058 West Grand Boulevard  
 Detroit, MI 48202

313.456.4686 (Office)  
 313.456.2558 (Revision Line)