



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

1357 7th St.
Muskegon, MI 49441

Prepared for:

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

Prepared By:

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

January 20th, 2016

ETC Job #: 177232

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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 1357 7th St., Muskegon, MI 49441. This inspection was conducted on January 20th, 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.

Chart A – Materials Sampled and Asbestos Content

Material #	Material Description	Asbestos	Quantity	Location (Refer to map in Appendix B)
1	Plaster Base, walls and ceilings.	No	9,000 SF	Throughout
2	Plaster Finish , finish ceilings	No	600 SF	Rooms 1,2,3
3	Duct/Boot insulation. Grey/White on register.	Yes	100 SF	Room 1,2,3,5,8,9
4	Drywall	No	1,300 SF	Throughout
5	Seam Tape	No	1,300 SF	Throughout
6	Mud/Joint Compound	No	1,300 SF	Throughout
7	Linoleum, wood grain	No	150 SF	Room 2
8	12x12 Floor Tile, black.	No	150 SF	Room 5
9	Floor Tile, Blue/beige stuck on floor tile.	No	150 SF	Room 13
10	Floor Tile, Black, Stick On	Yes	15 SF	Room 14
11	Floor Tile , Dark Grey	No	25 SF	Room 11
12	12x12 White /Orange, Ceiling Tile	No	600 SF	Rooms 8 and 9
13	Ceiling Tiles 2x4	No	20 SF	Room 11
14	Window glazing. White.	No	18 Windows	Exterior House
15	Blown In Insulation, white fluffy	No	500 SF	2 nd Floor/Attics
16	House Wrap, Black	No	2,400 SF	Ext House
17	Roofing. Black	No	1,300 SF	Ext. House
18	Chimney Cement, White	No	2 SF	Basement 15

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

Material #	Material Description	Quantity	Location
1	TV's	Two	Basement 15
2	Paint Can's	Three	Bed 9
3	Smoke Detectors	Three	Living Room 9, Bed 9, Room 10
4	Thermostat	One	Hall 12
5	Florescent light bulbs	One	Bath 11

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

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

Project Location : Vacant Residence
1357 7th St., Muskegon, MI

Attention : Samantha Ferguson

Client Project : N/A

ETC Job : 177232

Report Date : 1/22/2016

Login #	Sample ID	Work Requested	Completed
389784	01A	Asbestos Analysis	01/22/2016
389785	01B	Asbestos Analysis	01/22/2016
389786	01C	Asbestos Analysis	01/22/2016
389787	01D	Asbestos Analysis	01/22/2016
389788	01E	Asbestos Analysis	01/22/2016
389789	01F	Asbestos Analysis	01/22/2016
389790	01G	Asbestos Analysis	01/22/2016
389791	02A	Asbestos Analysis	01/22/2016
389792	02B	Asbestos Analysis	01/22/2016
389793	02C	Asbestos Analysis	01/22/2016
389794	03A	Asbestos Analysis	01/22/2016
389795	03B	Asbestos Analysis	01/22/2016
389796	03C	Asbestos Analysis	01/22/2016
389797	04A	Asbestos Analysis	01/22/2016
389798	04B	Asbestos Analysis	01/22/2016
389799	05A	Asbestos Analysis	01/22/2016
389800	05B	Asbestos Analysis	01/22/2016
389801	06A	Asbestos Analysis	01/22/2016
389802	06B	Asbestos Analysis	01/22/2016
389803	07A	Asbestos Analysis	01/22/2016

Login #	Sample ID	Work Requested	Completed
389804	07B	Asbestos Analysis	01/22/2016
389805	08A	Asbestos Analysis	01/22/2016
389806	08B	Asbestos Analysis	01/22/2016
389807	09A	Asbestos Analysis	01/22/2016
389808	09B	Asbestos Analysis	01/22/2016
389809	10A	Asbestos Analysis	01/22/2016
389810	10B	Asbestos Analysis	01/22/2016
389811	11A	Asbestos Analysis	01/22/2016
389812	11B	Asbestos Analysis	01/22/2016
389813	12A	Asbestos Analysis	01/22/2016
389814	12B	Asbestos Analysis	01/22/2016
389815	13A	Asbestos Analysis	01/22/2016
389816	13B	Asbestos Analysis	01/22/2016
389817	14A	Asbestos Analysis	01/22/2016
389818	14B	Asbestos Analysis	01/22/2016
389819	15A	Asbestos Analysis	01/22/2016
389820	15B	Asbestos Analysis	01/22/2016
389821	16A	Asbestos Analysis	01/22/2016
389822	16B	Asbestos Analysis	01/22/2016
389823	17A	Asbestos Analysis	01/22/2016
389824	17B	Asbestos Analysis	01/22/2016
389825	18A	Asbestos Analysis	01/22/2016
389826	18B	Asbestos Analysis	01/22/2016

Login #

Sample ID

Work Requested

Completed

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
 1357 7th St., Muskegon, MI

ETC Job : 177232
Client Project : N/A
Date Collected : 01/20/2016
Date Received : 01/21/2016
Date Analyzed : 01/22/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
389784 01A BR 1 Ceiling Layer-1 Analyst: Ian McCusker	Plaster	Grey Non-Fibrous Homogenous	2% Cellulose	98% Other	None Detected
389784 01A BR 1 Ceiling Layer-2 Analyst: Ian McCusker	Skim Coat	White Non-Fibrous Homogenous		100% Other	None Detected
389785 01B BR 2 S Wall Layer-1 Analyst: Ian McCusker	Plaster	Grey Non-Fibrous Homogenous	2% Cellulose	98% Other	None Detected
389785 01B BR 2 S Wall Layer-2 Analyst: Ian McCusker	Skim Coat	White Non-Fibrous Homogenous		100% Other	None Detected
389786 01C LR 3 Ceiling Layer-1 Analyst: Ian McCusker	Plaster	Grey Non-Fibrous Homogenous	2% Cellulose	98% Other	None Detected
389786 01C LR 3 Ceiling Layer-2 Analyst: Ian McCusker	Skim Coat	White Non-Fibrous Homogenous		100% Other	None Detected

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 38900 Huron River Drive
 Romulus, MI 48174
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 1357 7th St., Muskegon, MI

ETC Job : 177232
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Date Collected : 01/20/2016
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Date Analyzed : 01/22/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
389787 01D KN 5 S Wall Layer-1 Analyst: Ian McCusker	Plaster	Grey Non-Fibrous Homogenous	2% Cellulose	98% Other	None Detected
389787 01D KN 5 S Wall Layer-2 Analyst: Ian McCusker	Skim Coat	White Non-Fibrous Homogenous	2% Cellulose	98% Other	None Detected
389788 01E LR 5 Wall Layer-1 Analyst: Ian McCusker	Plaster	Grey Non-Fibrous Homogenous	2% Cellulose	98% Other	None Detected
389788 01E LR 5 Wall Layer-2 Analyst: Ian McCusker	Skim Coat	White Non-Fibrous Homogenous		100% Other	None Detected
389789 01F LR 8 Ceiling Layer-1 Analyst: Ian McCusker	Plaster	Grey Non-Fibrous Homogenous	2% Cellulose	98% Other	None Detected
389789 01F LR 8 Ceiling Layer-2 Analyst: Ian McCusker	Skim Coat	White Non-Fibrous Homogenous		100% Other	None Detected

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Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
389790 01G KN 13 Ceiling Layer-1 Analyst: Ian McCusker	Plaster	Grey Non-Fibrous Homogenous		100% Other	None Detected
389790 01G KN 13 Ceiling Layer-2 Analyst: Ian McCusker	Skim Coat	White Non-Fibrous Homogenous		100% Other	None Detected
389791 02A LR 3 Ceiling Analyst: Ian McCusker	Plaster Finish Ceiling	White Non-Fibrous Homogenous		100% Other	None Detected
389792 02B BR 1 Ceiling Analyst: Ian McCusker	Plaster Finish Ceiling	White Non-Fibrous Homogenous		100% Other	None Detected
389793 02C BR 2 Ceiling Analyst: Ian McCusker	Plaster Finish Ceiling	White Non-Fibrous Homogenous		100% Other	None Detected
389794 03A LR 8 Boot Analyst: Ian McCusker (on registers & 3 risers to 2nd floor)	Duct/Boot Insulation	Grey/White Fibrous Homogenous		80% Other	20% Chrysotile
389795 03B LR 8 Riser Analyst: Ian McCusker		Not Analyzed			

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Date Analyzed : 01/22/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
389796 03C LR 8 Boot Analyst: Ian McCusker		Not Analyzed			
389797 04A BR 9 Analyst: Ian McCusker	Drywall	White Non-Fibrous Homogenous		100% Other	None Detected
389798 04B LR 3 Ceiling Analyst: Ian McCusker	Drywall	White Non-Fibrous Homogenous		100% Other	None Detected
389799 05A BR 9 Analyst: Ian McCusker	Seam Tape	White Fibrous Homogenous	80% Cellulose	20% Other	None Detected
389800 05B LR 3 Analyst: Ian McCusker	Seam Tape	White Fibrous Homogenous	80% Cellulose	20% Other	None Detected
389801 06A BR 9 Analyst: Ian McCusker	Mud/Joint Compound	White Non-Fibrous Homogenous		100% Other	None Detected
389802 06B LR 3 Analyst: Ian McCusker	Mud/Joint Compound	White Non-Fibrous Homogenous		100% Other	None Detected

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Date Analyzed : 01/22/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
389803 07A BR 2nd FL Analyst: Ian McCusker	Linoleum	Wood Grain Fibrous Homogenous	70% Cellulose	30% Other	None Detected
389804 07B BR 2nd FL Analyst: Ian McCusker	Linoleum	Wood Grain Fibrous Homogenous	70% Cellulose	30% Other	None Detected
389805 08A KN 5 2nd FL Analyst: Ian McCusker	12x12 Stick-On Floor Tile	Wood Grain Non-Fibrous Homogenous		100% Other	None Detected
389806 08B KN 5 2nd FL Analyst: Ian McCusker	12x12 Stick-On Floor Tile	Wood Grain Non-Fibrous Homogenous		100% Other	None Detected
389807 09A KN 13 1st FL Analyst: Ian McCusker	Stick-On Floor Tile	Blue/Beige Non-Fibrous Homogenous		100% Other	None Detected
389808 09B KN 13 1st FL Analyst: Ian McCusker	Stick-On Floor Tile	Blue/Beige Non-Fibrous Homogenous		100% Other	None Detected
389809 10A Stair Down 1st FL Analyst: Ian McCusker	Stick-On Floor Tile	Black Non-Fibrous Homogenous		98% Other	2% Chrysotile

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 38900 Huron River Drive
 Romulus, MI 48174
Location : Vacant Residence
 1357 7th St., Muskegon, MI

ETC Job : 177232
Client Project : N/A
Date Collected : 01/20/2016
Date Received : 01/21/2016
Date Analyzed : 01/22/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
389810 10B Stair Down 1st FL Analyst: Ian McCusker		Not Analyzed			
389811 11A Bath 11 1st FL Analyst: Ian McCusker	Floor Tile	Dark Grey Non-Fibrous Homogenous		100% Other	None Detected
389812 11B Bath 11 1st FL Analyst: Ian McCusker	Floor Tile	Dark Grey Non-Fibrous Homogenous		100% Other	None Detected
389813 12A LR 8 1st FL Analyst: Ian McCusker	12x12 Ceiling Tile	White/Orange Fibrous Homogenous	80% Cellulose	20% Other	None Detected
389814 12B BR 9 1st FL Analyst: Ian McCusker	12x12 Ceiling Tile	White/Orange Fibrous Homogenous	80% Cellulose	20% Other	None Detected
389815 13A Bath 11 1st FL Analyst: Ian McCusker	2x4 Ceiling Tile	White Fibrous Homogenous	80% Cellulose	20% Other	None Detected
389816 13B Bath 11 1st FL Analyst: Ian McCusker	2x4 Ceiling Tile	White Fibrous Homogenous	80% Cellulose	20% Other	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
1357 7th St., Muskegon, MI

ETC Job : 177232
Client Project : N/A
Date Collected : 01/20/2016
Date Received : 01/21/2016
Date Analyzed : 01/22/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
389817 14A Ext N Analyst: Ian McCusker	Window Glazing	White Non-Fibrous Homogenous		100% Other	None Detected
389818 14B Ext S Analyst: Ian McCusker	Window Glazing	White Non-Fibrous Homogenous		100% Other	None Detected
389819 15A KN 5 Ceiling Analyst: Ian McCusker	Blown-In Insulation	White Fibrous Homogenous	100% Fiberglass		None Detected
389820 15B KN 5 Ceiling Analyst: Ian McCusker	Blown-In Insulation	White Fibrous Homogenous	100% Fiberglass		None Detected
389821 16A N Ext Analyst: Ian McCusker	House Wrap	Black Fibrous Homogenous	80% Cellulose	20% Other	None Detected
389822 16B N Ext Analyst: Ian McCusker	House Wrap	Black Fibrous Homogenous	80% Cellulose	20% Other	None Detected
389823 17A NW Cmr Analyst: Ian McCusker	Roof	Black Non-Fibrous Homogenous		100% Other	None Detected

Polarized Light Microscopy Asbestos Analysis Report

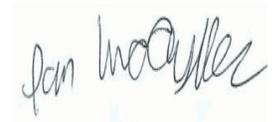
To : Environmental Testing And Consulting Inc.
 38900 Huron River Drive
 Romulus, MI 48174
Location : Vacant Residence
 1357 7th St., Muskegon, MI

ETC Job : 177232
Client Project : N/A
Date Collected : 01/20/2016
Date Received : 01/21/2016
Date Analyzed : 01/22/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
389824 17B NW Cmr Analyst: Ian McCusker	Roof	Black Non-Fibrous Homogenous		100% Other	None Detected
389825 18A Bsmt Analyst: Ian McCusker	Chimney Cement	White Non-Fibrous Homogenous		100% Other	None Detected
389826 18B Bsmt Analyst: Ian McCusker	Chimney Cement	White Non-Fibrous Homogenous		100% Other	None Detected



Lab Supervisor/Other Signatory



Analyst: Ian McCusker

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

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.

Asbestos Material Sampling Summary Sheet

Surfacing materials

Revision date 5/7/2015

Job #:	Building: 1357 7th St. MUSKEGON			Date: 1-20-16 1-20-16			
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 BASE BASE WALLS / BOARD / ceiling	F	A	BED-1 ceiling	Throughout	9,000 SF	389784
			B	BED-2 SWALL			389785
			C	LIVING-3 ceiling			389786
			D	KITCHEN-5 SWALL			389787
			E	LIVING-8 wall			389788
			F	LIVING-8 ceiling			389789
			G	KITCHEN 13 ceiling			389790
02	Material: PLASTER FINISH FINISH ceiling	F	A	LIVING 3 ceiling	1,2,3	600 SF	389791
			B	BED 1 ceiling			389792
			C	BED 2 ceiling			389793
			D				
	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 #: 177232		Building: 1357 TR ⁵ MUSKEGON			Date: 1-20-16			
Material no.	Material Description	Friable (F) / Non-Friable (NF)	Sample Letter	Sample Location	Material Located throughout bldg (Please List all Rooms)	Quantity	Picture #	
03	Material: DUCT/BOOT INSULATION	F	A	LIVING 8 BOOT	12,35 8.9	100 SF	389794	
	Description: ON GRAY WHITE REGISTERS & 3 risers to 2nd FL		B	LIVING 8 RISER				389795
			C	LIVING 3 BOOT				389796
	Material:							
	Description							
	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 #: 177232		Building: 1375 7th St. MUSKEGON			Date: 1-19-16		
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: WOOD DRY WALL	F	A	BED 9	THROUGHOUT	1300 SF	389797
	Description		B	LIVING 3 ceiling			389798
05	Material: SEAM TAPE	F	A	BED 9	}	}	389799
	Description		B	LIVING 3			389800
06	Material: MUD/JOINT COMPOUND	F	A	BED 9	}	}	389801
	Description		B	LIVING 3			389802
07	Material: LINOLEUM	F	A	BED 0 2ND FL	2	150 SF	389803
	Description		B	BED 2ND FL			389804
08	Material: FLOOR TILE (BLACK BACK)	F	A	KITCHEN-5 2ND FL	5	150 SF	389805
	Description		B	KITCHEN-5 2ND FL			389806
09	Material: FLOOR TILE	F	A	KITCHEN-13 1ST FL	13	150 SF	389807
	Description		B	KITCHEN-13 1ST FL			389808
10	Material: FLOOR TILE	F	A	STAIR DOWN 1ST FL	14	15 SF	389809
	Description		B	" "			389810
11	Material: FLOOR TILE	F	A	BATH 11 1ST FL	11	25 SF	389811
	Description		B	BATH 11			389812
12	Material: CEILING TILE FIBER	F	A	LIVING 8 1ST FL		600 SF	389813
	Description		B	BEDS 9 1ST FL			389814
13	Material: CERAMIC TILE	F	A	BATH 11 1ST FL	11	20 SF	389815
	Description		B	BATH 11 "			389816

Asbestos Material Sampling Summary Sheet Miscellaneous materials

Revision date 5/7/2015

Job #:	Building: 1357 7TH ST. MUSKELCON			Date: 1-20-16			
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: WINDOW GLAZING	F	A	EXT - NORTH			389817
	Description: WHITE		B	EXT. - SOUTH			389818
15	Material: BLOWN INSULATION	F	A	KITCHEN'S CEILING		500	389819
	Description: WHITE FLUFFY		B	KITCHEN'S CEILING		SF	389820
16	Material: HOUSE WRAP	F	A	NORTH EXTERIOR		2,400	389821
	Description: BLACK		B			SF	389822
17	Material: ROOF SHINGLES	NF	A	NW CORNER		1,300	389823
	Description: BLACK		B			SF	389824
18	Material: CHIMNEY CEMENT	F	A	BASEMENT		2	389825
	Description: WHITE		B			SF	389826
	Material:						
	Description:						
	Material:						
	Description:						
	Material:						
	Description:						
	Material:						
	Description:						

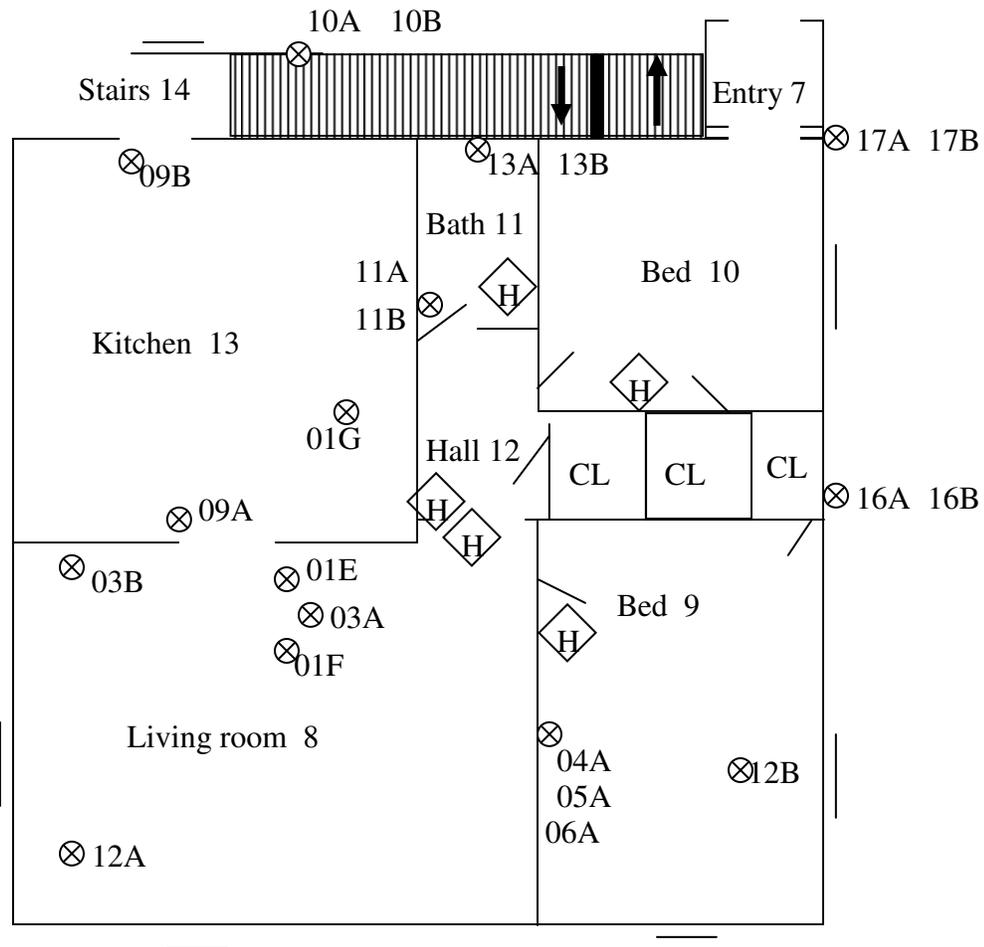
APPENDIX B

SITE MAP

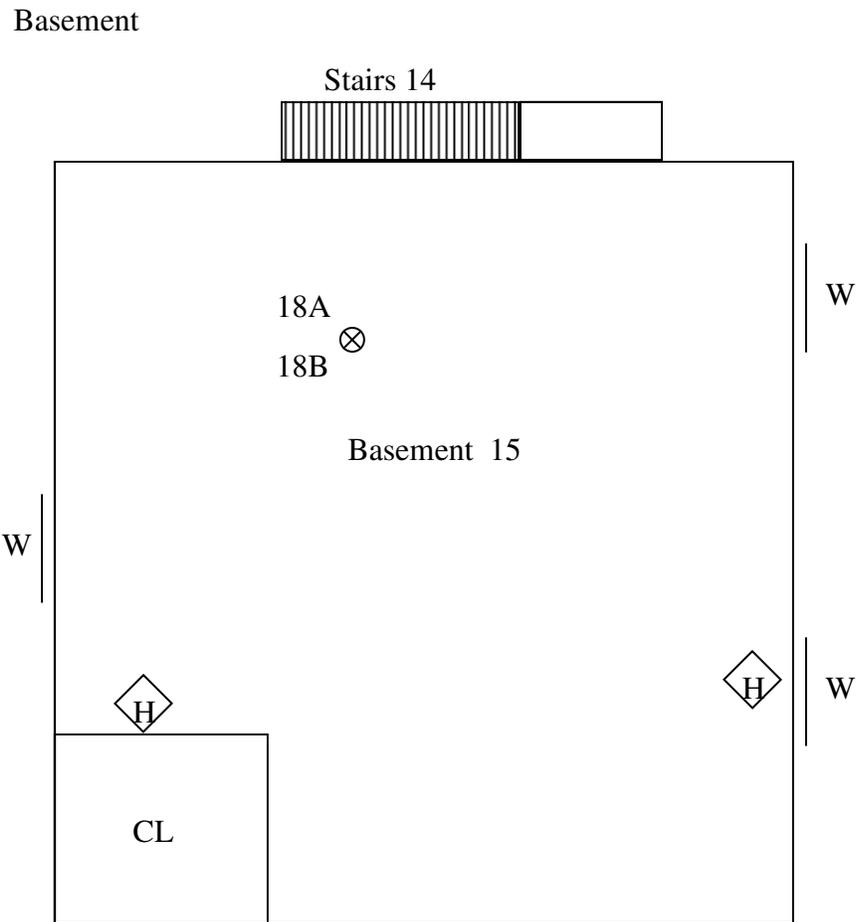
1st floor

Exterior House 15

All windows are wood.



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.



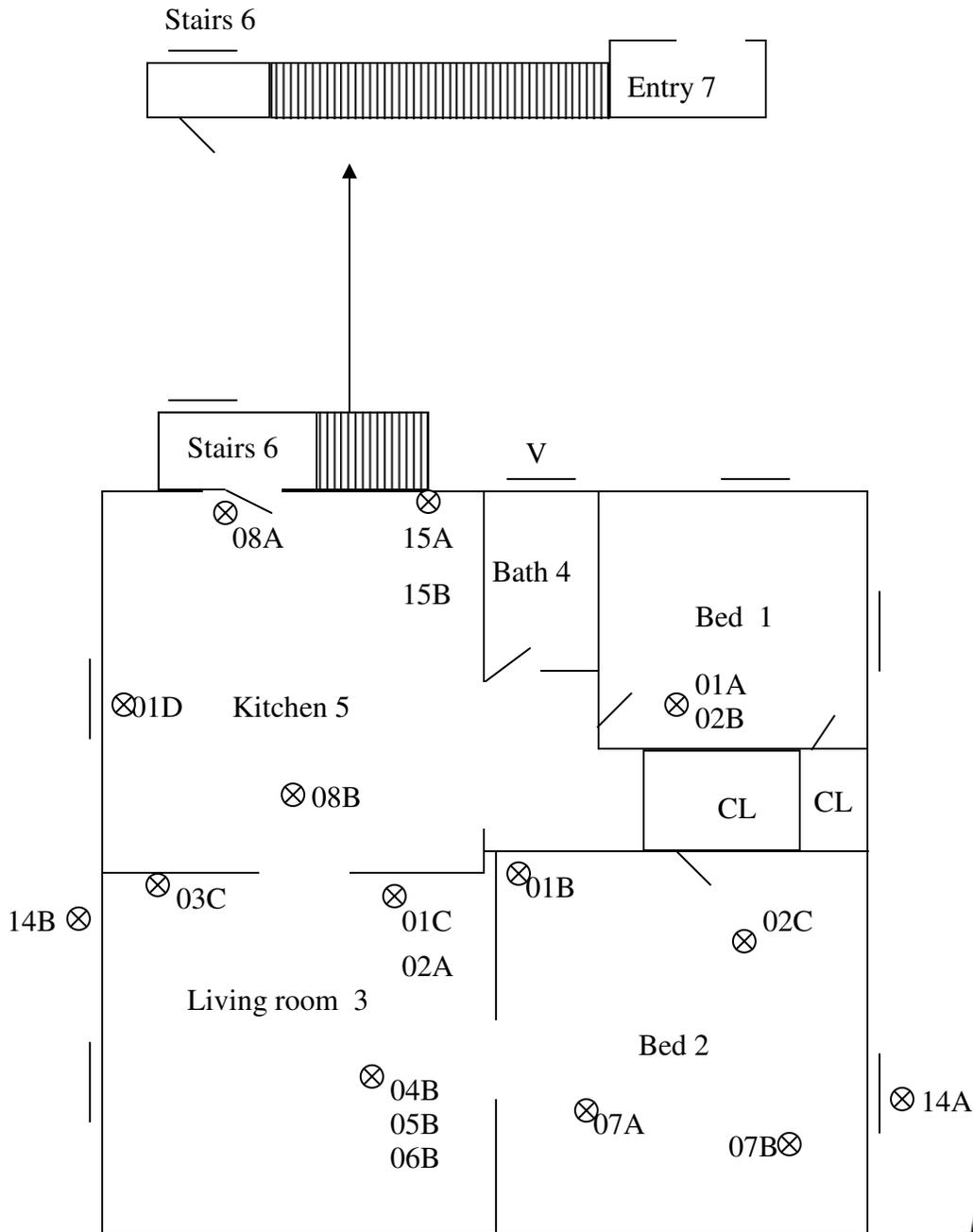
Please Note: This is a rough floor plan only. All items, (doorways, Windows, etc.) may not be included in this illustration. Also, room and component sizes are not drawn to scale.



2nd floor

1357 7th St., Muskegon, MI 49441

Windows Wood, unless noted



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.



City of Muskegon
177232

APPENDIX C

PHOTOGRAPHS



Side A



Side B



Side C



Side C



Hazard : TV, Basement



Hazard : TV, Basement



Hazard: Paint Can's, Bed 9



Hazard: Smoke Detector



Hazard: Smoke Detector



Hazard: Smoke Detector



Hazard: Thermostat



Hazard : Fluorescent Light Bulb

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		
				<input type="checkbox"/> Ln. Ft.	<input type="checkbox"/> 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)