



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

725 Ellifson
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 25th, 2016

ETC Job #: 177234

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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 725 Ellifson, Muskegon, MI 49441. This inspection was conducted on January 25th, 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, Stuart Yankee and Aaron Yankee, conducted the ACBM inspection and identified materials suspected of containing asbestos. Stuart Yankee and Aaron 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, Grey base, white finish	No	3,200 SF	Room 2,3,4,5,6,7,8
2	Duct Wrap, white/grey papery. On boots.	Yes	20 SF	Rooms 2,3,4,6,7,9
3	Chimney Cement	Yes	2 SF	Room 9
4	Drywall, white	No	200 SF	Rooms 3,6
5	Seam Tape, white	No	200 SF	Room 3
6	Mud/Joint Compound, white	No	200 SF	Room 3
7	Linoleum, cream/gold	Yes	50 SF	Room 8
8	Linoleum, beige, red/blue	No	50 SF	Room 8
9	Linoleum, tan stone pattern	Yes	25 SF	Room 5
10	6x6 Floor Tile, under mat #9.	No	25 SF	Room 5
11	Linoleum, cream hexagon's	No	200 SF	Room 7
12	Linoleum, under mat #11, orange stone pattern	No	200 SF	Room 7
13	Linoleum, under mat #12, wood grain/black paper	No	200 SF	Room 7
14	House Wrap, brown paper	No	1600 SF	Room 10
15	Window Glazing , white	No	11 Units	Room 10
16	Window Glazing, white	No	6 Units	Room 11
17	Roof, House black.	No	1200 SF	Room 10
18	Roof , Garage	No	400 SF	Room 11
19	Blown in insulation, white/brown fiber	No	850 SF	Attic

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

Material #	Material Description	Quantity	Location
1	Water heater, refrigerator and washer	3	Kitchen 7 & Basement 9
2	Electronics	7	Kitchen 7, dining room 3, interior Garage
3	Mortar mix/caulks/solvents/cleaners/glue	10	Rooms 1, 12
4	Paint Cans	18	Room 1
5	Unlabeled containers	2	Room 12
6	Tires	9	Enclosed porch, basement 9 , Interior Garage 12
7	Misc. Medications.	Box Full	Living Room 2
8	Propane /Fuel Can's	2	Interior Garage 12
9	Motor Oil and Misc Auto Fluids.	5	Interior Garage 12

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:



Stuart Yankee and Aaron 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
725 Ellifson, Muskegon, MI

Attention : Samantha Ferguson

Client Project : N/A

ETC Job : 177234

Report Date : 1/28/2016

Login #	Sample ID	Work Requested	Completed
390409	01A	Asbestos Analysis	01/28/2016
390410	01B	Asbestos Analysis	01/28/2016
390411	01C	Asbestos Analysis	01/28/2016
390412	01D	Asbestos Analysis	01/28/2016
390413	01E	Asbestos Analysis	01/28/2016
390414	02A	Asbestos Analysis	01/28/2016
390415	02B	Asbestos Analysis	01/28/2016
390416	02C	Asbestos Analysis	01/28/2016
390417	03A	Asbestos Analysis	01/28/2016
390418	03B	Asbestos Analysis	01/28/2016
390419	04A	Asbestos Analysis	01/28/2016
390420	04B	Asbestos Analysis	01/28/2016
390421	05A	Asbestos Analysis	01/28/2016
390422	05B	Asbestos Analysis	01/28/2016
390423	06A	Asbestos Analysis	01/28/2016
390424	06B	Asbestos Analysis	01/28/2016
390425	07A	Asbestos Analysis	01/28/2016
390426	07B	Asbestos Analysis	01/28/2016
390427	08A	Asbestos Analysis	01/28/2016
390428	08B	Asbestos Analysis	01/28/2016

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Login #	Sample ID	Work Requested	Completed
390429	09A	Asbestos Analysis	01/28/2016
390430	09B	Asbestos Analysis	01/28/2016
390431	10A	Asbestos Analysis	01/28/2016
390432	10B	Asbestos Analysis	01/28/2016
390433	11A	Asbestos Analysis	01/28/2016
390434	11B	Asbestos Analysis	01/28/2016
390435	12A	Asbestos Analysis	01/28/2016
390436	12B	Asbestos Analysis	01/28/2016
390437	13A	Asbestos Analysis	01/28/2016
390438	13B	Asbestos Analysis	01/28/2016
390439	14A	Asbestos Analysis	01/28/2016
390440	14B	Asbestos Analysis	01/28/2016
390441	15A	Asbestos Analysis	01/28/2016
390442	15B	Asbestos Analysis	01/28/2016
390443	16A	Asbestos Analysis	01/28/2016
390444	16B	Asbestos Analysis	01/28/2016
390445	17A	Asbestos Analysis	01/28/2016
390446	17B	Asbestos Analysis	01/28/2016
390447	18A	Asbestos Analysis	01/28/2016
390448	18B	Asbestos Analysis	01/28/2016
390449	19A	Asbestos Analysis	01/28/2016
390450	19B	Asbestos Analysis	01/28/2016

Reviewed by:



Quality Assurance Coordinator

Login #

Sample ID

Work Requested

Completed

Polarized Light Microscopy Asbestos Analysis Report

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

ETC Job : 177234
Client Project : N/A
Date Collected : 01/25/2016
Date Received : 01/26/2016
Date Analyzed : 01/28/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
390409 01A LR 2, N Wall Layer-1 Analyst: Ian McCusker	Plaster	Gray Non-Fibrous Homogenous	2% Cellulose	98% Other	None Detected
390409 01A LR 2, N Wall Layer-2 Analyst: Ian McCusker	Skim Coat	White Non-Fibrous Homogenous		100% Other	None Detected
390410 01B BR 4, Clg Layer-1 Analyst: Ian McCusker	Plaster	Gray Non-Fibrous Homogenous	2% Cellulose	98% Other	None Detected
390410 01B BR 4, Clg Layer-2 Analyst: Ian McCusker	Skim Coat	White Non-Fibrous Homogenous		100% Other	None Detected
390411 01C BR 6, Wall Layer-1 Analyst: Ian McCusker	Plaster	Gray Non-Fibrous Homogenous	2% Cellulose	98% Other	None Detected
390411 01C BR 6, Wall Layer-2 Analyst: Ian McCusker	Skim Coat	White Non-Fibrous Homogenous		100% Other	None Detected
390412 01D DR 3, Clg Layer-1 Analyst: Ian McCusker	Plaster	Gray Non-Fibrous Homogenous	2% Cellulose	98% Other	None Detected
390412 01D DR 3, Clg Layer-2 Analyst: Ian McCusker	Skim Coat	White Non-Fibrous Homogenous		100% Other	None Detected

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 38900 Huron River Drive
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Date Collected : 01/25/2016
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Date Analyzed : 01/28/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
390413 01E Strs 7, Wall Layer-1 Analyst: Ian McCusker	Plaster	Gray Non-Fibrous Homogenous	2% Cellulose	98% Other	None Detected
390413 01E Strs 7, Wall Layer-2 Analyst: Ian McCusker	Skim Coat	White Non-Fibrous Homogenous		100% Other	None Detected
390414 02A BR 6, Boot Analyst: Ian McCusker	Paper Duct Wrap On Boots	White/Gray Fibrous Homogenous		85% Other	15% Chrysotile
390415 02B DR 3, Boot Analyst: Ian McCusker		Not Analyzed			
390416 02C Bsmt 9, Duct Analyst: Ian McCusker		Not Analyzed			
390417 03A Bsmt 9, at Stack Analyst: Ian McCusker	Chimney Cement	White Non-Fibrous Homogenous		98% Other	2% Chrysotile
390418 03B Bsmt 9, at Stack Analyst: Ian McCusker		Not Analyzed			

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ETC Job : 177234
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Date Collected : 01/25/2016
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Date Analyzed : 01/28/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
390419 04A DR 3, Clg Analyst: Ian McCusker	Drywall	White Non-Fibrous Homogenous		100% Other	None Detected
390420 04B DR 3, Clg Analyst: Ian McCusker	Drywall	White Non-Fibrous Homogenous		100% Other	None Detected
390421 05A DR 3, Clg Analyst: Ian McCusker	Seam Tape	White Fibrous Homogenous	90% Cellulose	10% Other	None Detected
390422 05B DR 3, Clg Analyst: Ian McCusker	Seam Tape	White Fibrous Homogenous	90% Cellulose	10% Other	None Detected
390423 06A DR 3, Clg Analyst: Ian McCusker	Mud/Joint Compound	White Non-Fibrous Homogenous		100% Other	None Detected
390424 06B DR 3, Clg Analyst: Ian McCusker	Mud/Joint Compound	White Non-Fibrous Homogenous		100% Other	None Detected
390425 07A Back Strs 8 Analyst: Ian McCusker	Linoleum	Cream/Gold Non-Fibrous Homogenous		90% Other	10% Chrysotile

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Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
390426 07B Back Strs 8 Analyst: Ian McCusker		Not Analyzed			
390427 08A Back Strs 8 Analyst: Ian McCusker	Linoleum	Beige/Red/Blue Fibrous Homogenous	20% Cellulose	80% Other	None Detected
390428 08B Back Strs 8 Analyst: Ian McCusker	Linoleum	Beige/Red/Blue Fibrous Homogenous	20% Cellulose	80% Other	None Detected
390429 09A Bath 5 Analyst: Ian McCusker	Stone Pattern Linoleum	Tan Non-Fibrous Homogenous		85% Other	15% Chrysotile
390430 09B Bath 5 Analyst: Ian McCusker		Not Analyzed			
390431 10A Bath 5 Layer-1 Analyst: Ian McCusker	6x6 Floor Tile Under Mat 09	Black/White Non-Fibrous Homogenous		100% Other	None Detected
390431 10A Bath 5 Layer-2 Analyst: Ian McCusker	Paper Back	Black Fibrous Homogenous	80% Cellulose	20% Other	None Detected

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Date Analyzed : 01/28/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
390432 10B Bath 5 Layer-1 Analyst: Ian McCusker	6x6 Floor Tile Under Mat 09	Black/White Non-Fibrous Homogenous		100% Other	None Detected
390432 10B Bath 5 Layer-2 Analyst: Ian McCusker	Paper Back	Black Fibrous Homogenous	80% Cellulose	20% Other	None Detected
390433 11A KN 7 Analyst: Ian McCusker	Hexagon Pattern Linoleum	Cream Non-Fibrous Homogenous	20% Cellulose	80% Other	None Detected
390434 11B KN 7 Analyst: Ian McCusker	Hexagon Pattern Linoleum	Cream Non-Fibrous Homogenous	20% Cellulose	80% Other	None Detected
390435 12A KN 7 Analyst: Ian McCusker	Stone Pattern Linoleum Under Mat 11	Orange Non-Fibrous Homogenous	20% Cellulose	80% Other	None Detected
390436 12B KN 7 Analyst: Ian McCusker	Stone Pattern Linoleum Under Mat 11	Orange Non-Fibrous Homogenous	20% Cellulose	80% Other	None Detected
390437 13A KN 7 Layer-1 Analyst: Ian McCusker	Wood Grain Linoleum Under Mat 12	Tan Non-Fibrous Homogenous	20% Cellulose	80% Other	None Detected
390437 13A KN 7 Layer-2 Analyst: Ian McCusker	Paper	Black Fibrous Homogenous	60% Cellulose	40% 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
 725 Ellifson, Muskegon, MI

ETC Job : 177234
Client Project : N/A
Date Collected : 01/25/2016
Date Received : 01/26/2016
Date Analyzed : 01/28/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
390438 13B KN 7 Layer-1 Analyst: Ian McCusker	Wood Grain Linoleum Under Mat 12	Tan Non-Fibrous Homogenous	20% Cellulose	80% Other	None Detected
390438 13B KN 7 Layer-2 Analyst: Ian McCusker	Paper	Black Fibrous Homogenous	60% Cellulose	40% Other	None Detected
390439 14A Ext 10, Under Wood Analyst: Ian McCusker	House Wrap Paper	Brown Fibrous Homogenous	70% Cellulose	30% Other	None Detected
390440 14B Ext 10, Under Wood Analyst: Ian McCusker	House Wrap Paper	Brown Fibrous Homogenous	70% Cellulose	30% Other	None Detected
390441 15A Ext 10, N Analyst: Ian McCusker	Window Glazing	White Non-Fibrous Homogenous		100% Other	None Detected
390442 15B Ext 10, E Analyst: Ian McCusker	Window Glazing	White Non-Fibrous Homogenous		100% Other	None Detected
390443 16A Garage 11, S Analyst: Ian McCusker	Window Glazing	White Non-Fibrous Homogenous		100% Other	None Detected

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Polarized Light Microscopy Asbestos Analysis Report

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

ETC Job : 177234
Client Project : N/A
Date Collected : 01/25/2016
Date Received : 01/26/2016
Date Analyzed : 01/28/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
390444 16B Garage 11, E Analyst: Ian McCusker	Window Glazing	White Non-Fibrous Homogenous		100% Other	None Detected
390445 17A Ext 10, SW Analyst: Ian McCusker	Roof-House	Black Non-Fibrous Homogenous	20% Cellulose	80% Other	None Detected
390446 17B Ext 10, SW Analyst: Ian McCusker	Roof-House	Black Non-Fibrous Homogenous	20% Cellulose	80% Other	None Detected
390447 18A Ext 11, NE Analyst: Ian McCusker	Roof-Garage	Black Non-Fibrous Homogenous		100% Other	None Detected
390448 18B Ext 11, NE Analyst: Ian McCusker	Roof-Garage	Black Non-Fibrous Homogenous		100% Other	None Detected
390449 19A DR 3, Clg/Attic Analyst: Ian McCusker	Fiber Blown-In	White/Brown Fibrous Homogenous	50% Cellulose 50% Fiberglass		None Detected
390450 19B DR 3, Clg/Attic Analyst: Ian McCusker	Fiber Blown-In	White/Brown Fibrous Homogenous	50% Cellulose 50% Mineral wool		None Detected

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Polarized Light Microscopy Asbestos Analysis Report

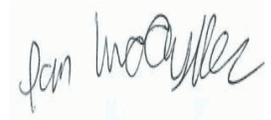
To : Environmental Testing And Consulting Inc.
 38900 Huron River Drive
 Romulus, MI 48174
Location : Vacant Residence
 725 Ellifson, Muskegon, MI

ETC Job : 177234
Client Project : N/A
Date Collected : 01/25/2016
Date Received : 01/26/2016
Date Analyzed : 01/28/2016

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
--------	-------------	------------	-----------	---------------	------------



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.

ENVIRONMENTAL TESTING LABORATORIES, INC

38900 Huron River Drive
Romulus, Michigan 48174
(734) 955-6600
Fax: (734) 992-2261
www.2eti.com

**Bulk Asbestos
Chain of Custody**

ETL Project #: _____

AARON YANKEE

Client: ETC	Contact: STUART YANKEE	Project Location/name: MUSKEGON BLIGHT 725 ELLIFSON AVE MUSKEGON MI 49442
Address: Romulus	Phone: _____	Client Project #: 177234
Please Provide Results: <input type="checkbox"/> Email <input type="checkbox"/> Fax <input type="checkbox"/> Verbal <input type="checkbox"/> Other _____		Date Sampled: _____

Turnaround Time (TAT): ~~RUSH~~ Same Day 24 hr 48 hr Standard (3+ days) Other _____

PLM Instructions (Check all that apply)

Changed To 48hr P.

PLM EPA600/R-93/116, 1993 (Standard method) Stop at 1st Positive -

Point Counting: 400 Points* *Clearly mark Homogenous Group*

PLM Non-Building Material (Dust, Wipe, Tape) Soil or Vermiculite Analysis *

* Additional charge and turnaround may be required

Lab ID	Sample ID	Sample Location	Material Description
390409	O1A - O1E	<i>SEE SAMPLE SUMMARY sheets</i>	
<i>thru</i>	O2A - O2C		
390450	O3A - 19B		

	Name/Organization	Date	Time
Relinquished (Name/Organization):	<i>STUART YANKEE / ETC</i>	<i>1-25-16</i>	<i>am/pm</i>
Received (Name/ETL):	<i>mp</i>	<i>1/24/16</i>	<i>am/pm</i>
Stereoscopical Analysis (Name/ETL):	<i>pm</i>	<i>1-26-16</i>	<i>am/pm</i>
Sample Login (Name/ETL):	<i>mp</i>	<i>1/24/16</i>	<i>am/pm</i>
Analysis (Name/ETL):	<i>pm</i>	<i>1-26-16</i>	<i>am/pm</i>
QA/QC Review (Name/ETL):			<i>am/pm</i>

Special Instructions:	Remarks:
-----------------------	----------

Asbestos Material Sampling Summary Sheet

Surfacing materials

Revision date 5/7/2015

Job #: 17723A		Building: 725 ELLIFSON AVE, MUSKEGON			Date: 1-25-16			
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 2 - N. WALL	390409	3200 SF		
	GRAY BASE WHITE FINISH		B	BED 4	CEILING			390410
			C	BED 6	WALL			390411
			D	DINING 3	CEILING			390412
			E	STAIR 8	WALL			390413
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 #: 177234		Building: 725 Ellison Ave Muskegon			Date: 1-25-16		
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 WRAP	F	A	BED 6 BOOT 390414	2, 3, 5, 4, 7, 9	20	
	Description: WHITE/GRAY PAPERY ON BOOTS!		B	DINING 3 BOOT 390415			
			C	BASEMENT 9 DUCT 390416			
	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 #: 177234		Building: 725 ELLIFSON AVE. MUSKEGON			Date: 1-25-16		
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: CHIMNEY CASING	F	A	BASEMENT 9 @ STAIRS	390417	9	2 SF
	Description: WHITE		B				
04	Material: DRYWALL	F	A	DINING 3 ceiling	390419	3,6	200 SF
	Description: SEAM TAPE WHITE		B				
05	Material: SEAM TAPE	F	A	DINING 3 ceiling	390421	3	7
	Description: white		B				
06	Material: MUD/Joint compound	F	A	DINING 3 ceiling	390423	3	7
	Description: white		B				
07	Material: LINOLEUM	F	A	BACK STAIRS 8	390425	8	50 SF
	Description: CREAM/GOLD		B				
08	Material: LINOLEUM	F	A	BACK STAIRS 8	390427	8	50 SF
	Description: BEIGE w/ RED/BLUE		B				
09	Material: LINOLEUM	F	A	BATH 5	390429	5	25 SF
	Description: TAN STONE PATTERN		B				
10	Material: FLOOR TILE (under #9)	F	A	BATHS	390431	5	25 SF
	Description: 6" x 6" BLK/WHITE/BLK PAPER BACK		B				
11	Material: LINOLEUM	F	A	KITCHEN 7	390433	7	200 SF
	Description: CREAM HEXAGONS		B				
12	Material: LINOLEUM (under #11)	F	A	KITCHEN 7	390435	7	200 SF
	Description: ORANGE STONE PATTERN		B				

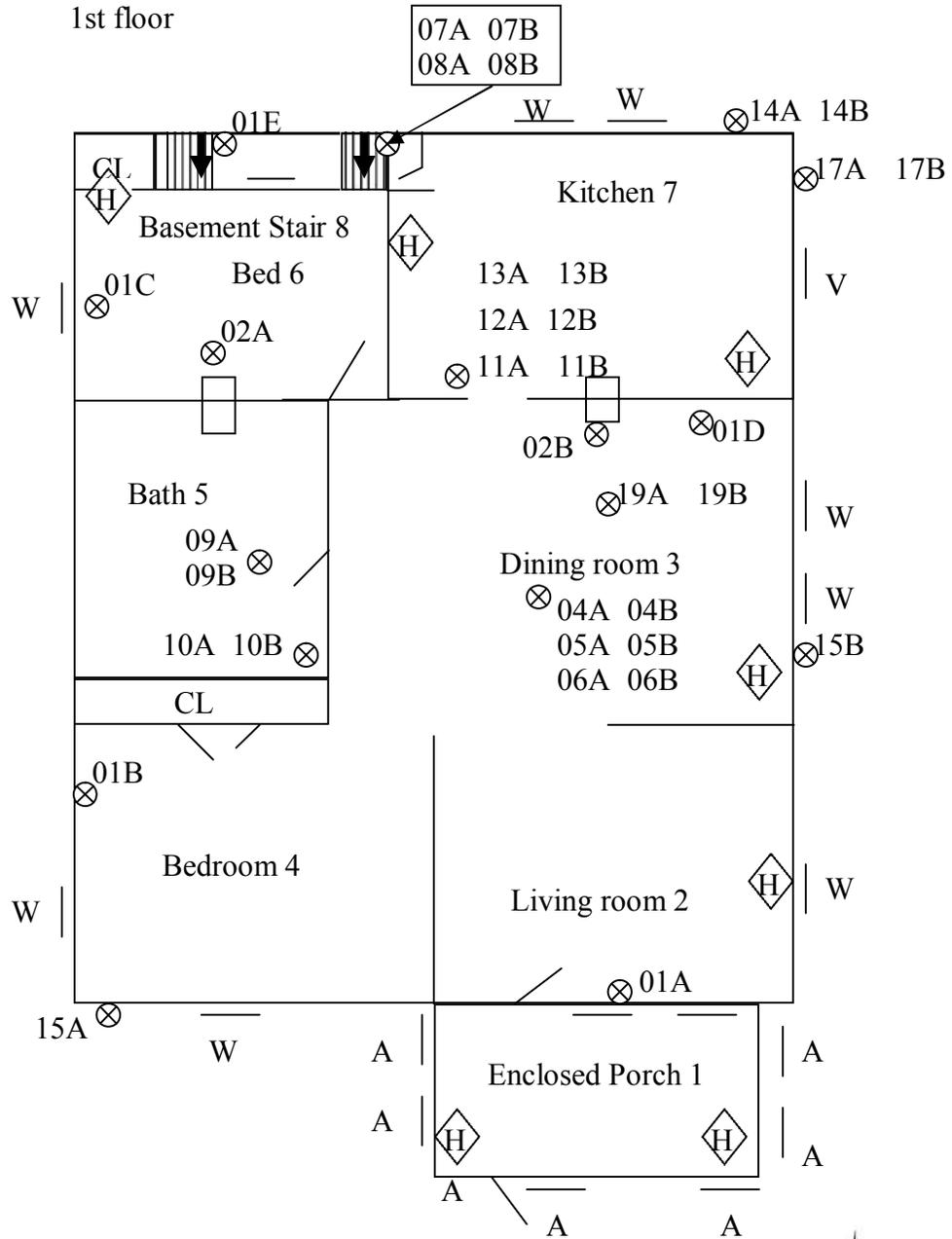
Asbestos Material Sampling Summary Sheet
Miscellaneous materials

Revision date 5/7/2015

Job #: 177234		Building: 725 ELLIFSON AVE. MUSKOGON			Date: 1-25-16		
Material no.	Material Description	Friable (F) / Non-Friable (NF)	Sample Letter	Sample Location	Material Located throughout bldg (Please List all Rooms)	Quantity	Picture #
13	Material: LINOLEUM UNDER #12	F	A	KITCHEN 7	390437	7	200 SF
	Description: WOOD GRAIN / BLK PAPER		B		390438		
14	Material: HOUSE WRAP	F	A	EXTERIOR ¹⁰ UNDER WOOD	390439	10	1600 SF
	Description: BROWN PAPER		B		390440		
15	Material: WINDOW GLAZING	F	A	EXTERIOR ¹⁰ NORTH	390441	10	10 UNITS
	Description: WHITE		B	EXTERIOR ¹⁰ EAST	390442		
16	Material: WINDOW GLAZING	F	A	GARAGE 11 SOUTH	390443	10	6 UNITS
	Description: WHITE		B	GARAGE 11 EAST	390444		
17	Material: ROOF - HOUSE	NF	A	EXT. 10 SW	390445	10	1200 SF
	Description: BLACK		B		390446		
18	Material: ROOF - GARAGE	NF	A	EXT. 11 NE	390447	11	400 SF
	Description: BLACK		B		390448		
19	Material: BLOWN IN	F	A	DINING 3 Ceiling / ATTIC	390449	ATTIC	850 SF
	Description: WHITE / BROWN FIBER		B		390450		
	Material:						
	Description:						
	Material:						
	Description:						
	Material:						
	Description:						

APPENDIX B

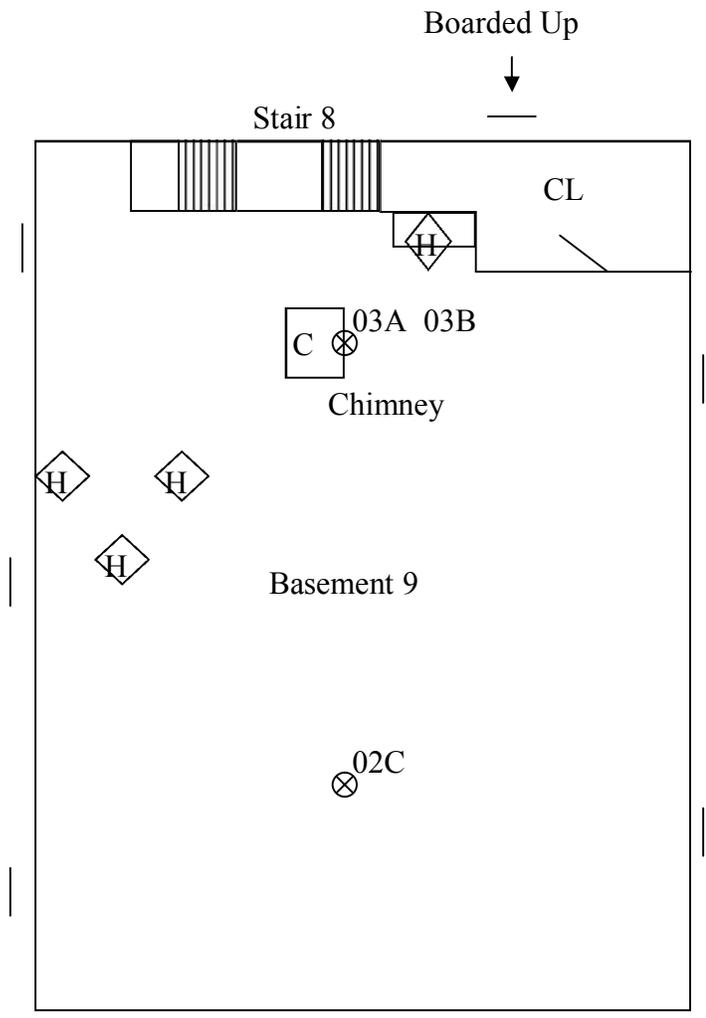
SITE MAP



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.



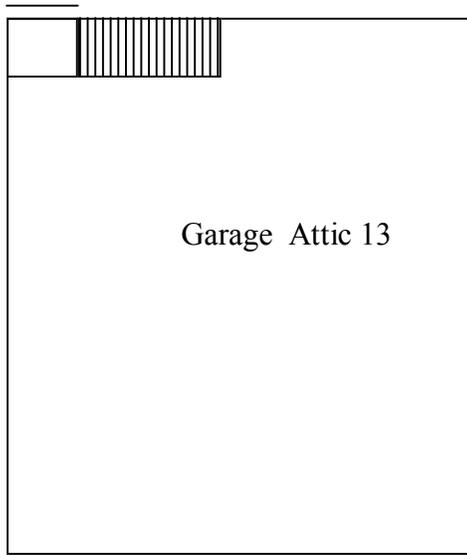
Basement—All windows Steel



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.

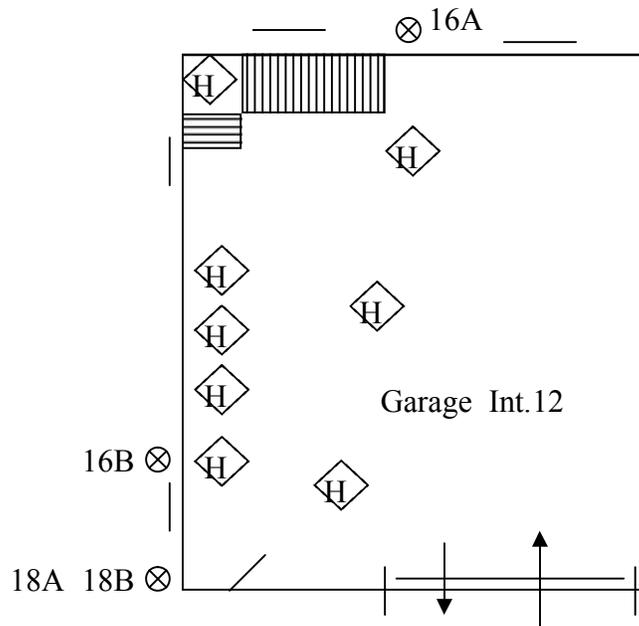


Interior Garage—Second Floor



All Garage Windows are wood

Interior Garage—First Floor



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

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 ln. 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 ln. 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: Michigan Land Bank Fast Track Authority

Mailing Address: 735 E. Michigan Avenue

City/State/Zip: Lansing, MI 48912

E-mail: petrowskis@michigan.gov

Contact: Shellene Petrowski Phone: 517-373-2796

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:

Name: _____

Address: _____

City/State/Zip: _____

Phone: _____

WASTE TRANSPORTER 2:

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 **not** removed prior to demo.

Category I

Category II

Units of Measure

				<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**, please use the e-submittal process. For more information visit <http://www.michigan.gov/air>, under Air Links click on Asbestos NESHAP Program.

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

517.284.6777 (Office)



Side A



Side B



Side C



Side D



Hazard: Refrigerator (Kitchen)



Hazard: Water Heater (Basement 9)



Hazard: Dryer (Basement 9)



Hazard : Misc Electronics (1) (Kitchen 7)



Hazard : Misc Electronics (2) (Garage or Dining room)



Hazard : Misc Electronics (3) (Garage or Dining room)



Hazard: Anti-freeze/Paint (Rooms 1 and 12)



Hazard: Misc Solvents, Auto Fluid. Propane tank. (Rooms 1 and 12)



Hazards: Aerosol, Vinegar, washing fluid.
(Rooms 1 and 12)



Hazard : Mortar Mix (Rooms 1 and 12)



Hazards: Misc oils, caulks, aerosols,
cleaners. (Rooms 1 and 12)



Hazard : Corroded paint can. (Rooms 1
and 12)



Hazard : Gas can, Misc bottles. (Rooms 1 and 12)



Hazard: Paint cans and Aerosol. (Rooms 1 and 12)



Hazard: Paint can's (Rooms 1 and 12)



Hazard: Paint Can's and Aerosols (Rooms 1 and 12)



Hazard: Unlabeled Containers (Room 12)



Hazard: Unlabeled Containers (2) (Room 12)



Hazards : Box of Misc. Medications.
(Living Room 2)



Hazard : Propane Fuel Can's—Int. Garage
12



Hazard: Propane/Fuel Cans (Int. Garage 12)



Hazard: Motor Oil, and Misc Auto Fluids. (Int Garage 12)