




46555 Humboldt Dr. Ste. 100  
Novi, MI 48377  
(248) 669-5140 | oneatlas.com



Client Name:	City of Kalamazoo
Project Name:	Commercial Building Asbestos Survey
Project Number:	188BS23418
Project Site Address (Subject Property):	1011 Cobb Street, Kalamazoo, MI 49700
Date of Site Visit:	May 24, 2023
Asbestos Inspection Performed by:	Corey Pruitt (A57116)
Asbestos Inspector's Signature:	
Areas Not Accessible:	Interior of garage was inaccessible
Number of Floors:	Garage Only
Asbestos Present (Yes/No/Other):	No asbestos identified in areas surveyed, however asbestos may be present in inaccessible areas.

On the date indicated above, State of Michigan Asbestos Inspector, Corey Pruitt (A57116) from Atlas Technical Consultants, conducted a pre-demolition asbestos and other regulated materials inspection of the subject unoccupied commercial property.

Table I identifies materials that were found to contain asbestos in concentrations greater than 1% and therefore are regulated under the rules of asbestos in the State of Michigan.

**TABLE I**  
**Asbestos-Containing Materials**

ID#	MATERIAL	LOCATION	QUANTITY	RESULT	NESHAP CATEGOR Y
None Contain Asbestos					

The purpose of this inspection was to task an accredited asbestos inspector to complete a pre-demolition asbestos and hazardous material survey of the subject site, and provide recommendation options for removal and disposal of identified hazardous/regulated materials prior to demolition of the building(s). The asbestos inspection consisted of the following three basic procedures: conducting a visual inspection of the structure, identifying homogeneous areas (HAs) of suspect surfacing, thermal system insulation, and miscellaneous materials; and sampling identified friable and non-friable suspect materials.

Bulk samples of suspect ACMs were collected and placed into individual containers for transport under Chain of Custody (COC) to a National Voluntary Lab Accreditation Program (NVLAP)-accredited laboratory for analysis. Materials typically known as non-asbestos items (i.e. fibrous glass, foam rubber, wood, etc.) were not sampled.

Laboratory Reports and associated COC's are provided in **Attachment A**. Photographs of the site are included in **Attachment B**. The following sections summarize Atlas' findings.

Table II below identifies the suspect asbestos-containing materials identified during the survey, their locations, approximate quantity, type and percentage of asbestos.

**TABLE II**  
**Suspect Asbestos-Containing Materials**

HA/ID#	MATERIAL	LOCATION	RESULT
1-RM-A,B,C	Roofing Material	EA 5	ND
2-VP-A,B,C	Vapor Paper (Under Roofing)	EA 5	ND
3-WG-A,B,C	Window Glaze	EA 5	ND

ND = No asbestos detected, NA = Not applicable, UNQ = Unquantified; PC = Point Count

No other suspect ACMs were observed on the site. Although not anticipated based on surface observations, underground structures that could contain ACM may be present and should be managed accordingly if encountered during site redevelopment.

Asbestos is a hazardous substance. Its condition, handling and disposal are regulated by federal, state, and local agencies. ACMs generally do not pose a health threat unless the asbestos fibers are disturbed, become airborne and are inhaled.

Contractors working in an area where asbestos is present must be informed of the type and location of ACMs. Abatement of ACMs, including non-friable ACMs, must be performed by a Michigan licensed, certified and



registered asbestos abatement contractor in accordance with state and federal Occupational Safety and Health Administration (OSHA) and local air quality management regulations.

Table III below lists Other Regulated Materials/Universal Wastes identified during the survey.

**TABLE III  
Other Regulated Materials/Universal Wastes**

MATERIAL	LOCATION	APPROXIMATE QUANTITY
None Observed		

Table IV below lists the functional spaces identified during the survey.

**Table IV  
Functional Space/ Exterior Area Designations**

DESCRIPTION	DESIGNATION
Roof	EA 5
Garage	FS-1
Exterior Area	EA 1,2,3,4

**RECOMMENDATIONS:**

Except for the following items listed below, Section 61.145(c) of the Asbestos NESHAP requires that each owner or operator of a demolition or demolition activity involving RACM remove all such material from a facility being demolished or renovated before any activity begins that would break up, dislodge, or similarly disturb the material or preclude access to the material for subsequent removal.

ACM need not be removed before demolition if it:

- (i) Is a Category I non-friable ACM that is not friable.
- (ii) Is on a facility component that is encased in concrete or other similarly hard material and is adequately wet whenever exposed during demolition.
- (iii) Was not accessible for testing and therefore was not discovered until after demolition began and, as a result of the demolition, cannot be safely removed. If not removed for safety reasons, the exposed RACM and any asbestos-contaminated debris must be treated as asbestos-containing waste material and kept adequately wet at all times until disposed of.
- (iv) Is a Category II non-friable ACM and the probability is low that the material will become crumbled, pulverized, or reduced to powder during demolition.

Demolition with Roofing Materials in place is covered under the NESHAP regulations (40 CFR Part 61 Subpart M).

Roofing materials that were not tested during this inspection should be assumed to be Category I asbestos-containing roofing materials.

Since demolition activities do not include sanding, grinding, cutting, or abrading, Category I asbestos-containing roofing materials not in poor condition and not friable are not considered RACM, and are allowed to

remain in place during demolition.

If the asbestos-containing roofing material is not in poor condition and is not friable, it may be disposed of in a landfill which accepts ordinary demolition waste.

The asbestos-containing roofing material may not be ground up for recycling into other products.

\*If joint compound within the drywall system is identified as positive, a composite sample was analyzed per NESHAP. If the drywall system as a composite sample is less than 1% asbestos, the material is not considered RACM per NESHAP. However, OSHA requirements regarding materials containing less than 1% asbestos still apply, and contractors performing work should ensure they comply with the requirements if the material is not removed prior to demolition.

In addition, contractors should ensure they follow all OSHA regulations pertaining to demolition / demolition of Category I Asbestos-containing materials. Category I or II non-friable ACM that is not subject to 61.150(a)(3) would still have to be disposed of in a landfill that accepts building debris, in a landfill that operates in accordance with 61.154, or at a facility that operates in accordance with 61.155.

**Prior to demolition, the following is recommended:**

An asbestos abatement company, licensed in the State of Michigan should remove the materials identified as asbestos containing in Table I in accordance with all applicable Local, State, and Federal Requirements prior to demolition.

Other Regulated Materials/Universal Wastes, identified in Table III, must be transported and disposed in accordance with all applicable Local, State, and Federal Requirements prior to demolition.

**LIMITATIONS:**

The results, findings, conclusions, and recommendations expressed in the report are based only on conditions that were noted during Atlas' inspection of the vacant above-referenced property located in Kalamazoo, Michigan.

Any conditions or materials that could not be visually identified through limited destructive sampling were not inspected and may differ from those conditions or materials noted. The user of this report should keep in mind that conditions may change with time and observations made by Atlas at the time of the site reconnaissance may not be consistent with future observations made by others.

Additional materials may be encountered during the demolition process and may require further sampling to determine disposal criteria.

The report is designed to aid the building owner, architect, construction manager, general contractors, and potential asbestos abatement contractors in locating asbestos building materials and Other Regulated Materials/Universal Wastes to be removed prior to demolition activities.

Under no circumstances is the report to be utilized as a bidding document or as a project specification document. Contractors bidding the demolition of this site should field-verify project information.

Atlas appreciates the opportunity to be of service to the City of Kalamazoo on this project. In the meantime, if you have questions regarding the information in this report or if we can be of further assistance do not hesitate to contact our office at (248) 669-5140.

**ATTACHMENT A**  
**LABORATORY REPORTS AND CHAIN OF CUSTODY**



**ENVIRONMENTAL TESTING LABORATORIES, INC.**

37575 W HURON RIVER DRIVE  
ROMULUS, MICHIGAN 48174  
(734) 955-6600  
FAX: (734) 955-6604

To: Atlas - Novi  
46555 Humboldt Dr. Suite 100  
Novi, Michigan 48377

ETL Job: 258025  
Client Project: 188BS23418

Attention: Robert Smith  
Project Location: 1011 Cobb St. , Kalamazoo , MI 49700

Lab Sample Number	Client Sample Number	Sample Type	Completed
1515173	1-RM-A	Asbestos	06/05/2023
1515174	1-RM-B	Asbestos	06/05/2023
1515175	1-RM-C	Asbestos	06/05/2023
1515176	2-VP-A	Asbestos	06/05/2023
1515177	2-VP-B	Asbestos	06/05/2023
1515178	2-VP-C	Asbestos	06/05/2023
1515179	3-WG-A	Asbestos	06/05/2023
1515180	3-WG-B	Asbestos	06/05/2023
1515181	3-WG-C	Asbestos	06/05/2023

Reviewed by: *Madeline Palmer*  
Madeline Palmer

Summary

Method	Sample	Layer	Mastic
PLM	9	3	



# Certificate of Analysis

Environmental Testing Laboratories, Inc.  
 37575 W Huron River Drive  
 Romulus, Michigan 48174  
 (734) 955-6600, Fax: (734) 955-6604

## Polarized Light Microscopy Asbestos Analysis Report

To : Atlas - Novi  
 46555 Humboldt Dr. Suite 100  
 Novi, Michigan 48377

ETL Job : 258025  
 Client Project : 188BS23418  
 Date Collected : 05/24/2023  
 Date Received : 05/31/2023

Location :  
 1011 Cobb St. , Kalamazoo , MI 49700

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
1515173 1-RM-A	Roofing Material	Black Non-Fibrous Homogenous	PLM 6% Cellulose	PLM 94% Other	PLM None Detected
Layer-1 Analyst: OJ Ivey Date Analyzed : 06/05/2023					
1515173 1-RM-A	Felt	Black Non-Fibrous Homogenous	PLM 3% Cellulose	PLM 97% Other	PLM None Detected
Layer-2 Analyst: OJ Ivey Date Analyzed : 06/05/2023					
1515174 1-RM-B	Roofing Material	Black Non-Fibrous Homogenous	PLM 9% Cellulose	PLM 91% Other	PLM None Detected
Layer-1 Analyst: OJ Ivey Date Analyzed : 06/05/2023					
1515174 1-RM-B	Felt	Black Non-Fibrous Homogenous	PLM 2% Cellulose	PLM 98% Other	PLM None Detected
Layer-2 Analyst: OJ Ivey Date Analyzed : 06/05/2023					
1515175 1-RM-C	Roofing Material	Black Non-Fibrous Homogenous	PLM 10% Cellulose	PLM 90% Other	PLM None Detected
Layer-1 Analyst: OJ Ivey Date Analyzed : 06/05/2023					
1515175 1-RM-C	Felt	Black Non-Fibrous Homogenous	PLM 2% Cellulose	PLM 98% Other	PLM None Detected
Layer-2 Analyst: OJ Ivey Date Analyzed : 06/05/2023					

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. An estimate of uncertainty can be provided at the client's request.



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To : Atlas - Novi  
 46555 Humboldt Dr. Suite 100  
 Novi, Michigan 48377

ETL Job : 258025  
 Client Project : 188BS23418  
 Date Collected : 05/24/2023  
 Date Received : 05/31/2023

Location :  
 1011 Cobb St. , Kalamazoo , MI 49700

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
1515176 2-VP-A	Vapor Paper, (under roofing)	Black Fibrous Homogenous	PLM 15% Cellulose	PLM 85% Other	PLM None Detected
Analyst: OJ Ivey Date Analyzed : 06/05/2023					
1515177 2-VP-B	Vapor Paper, (under roofing)	Black Fibrous Homogenous	PLM 15% Cellulose	PLM 85% Other	PLM None Detected
Analyst: OJ Ivey Date Analyzed : 06/05/2023					
1515178 2-VP-C	Vapor Paper, (under roofing)	Black Fibrous Homogenous	PLM 20% Cellulose	PLM 80% Other	PLM None Detected
Analyst: OJ Ivey Date Analyzed : 06/05/2023					
1515179 3-WG-A	Window Glaze	Gray Non-Fibrous Homogenous	PLM 2% Cellulose	PLM 98% Other	PLM None Detected
Analyst: OJ Ivey Date Analyzed : 06/05/2023					
1515180 3-WG-B	Window Glaze	Gray Non-Fibrous Homogenous	PLM 2% Cellulose	PLM 98% Other	PLM None Detected
Analyst: OJ Ivey Date Analyzed : 06/05/2023					
1515181 3-WG-C	Window Glaze	Gray Non-Fibrous Homogenous	PLM 1% Cellulose	PLM 99% Other	PLM None Detected
Analyst: OJ Ivey Date Analyzed : 06/05/2023					

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SAFETY CODE 2022-0

# Certificate of Analysis

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## Polarized Light Microscopy Asbestos Analysis Report

To : Atlas - Novi  
46555 Humboldt Dr. Suite 100  
Novi, Michigan 48377

ETL Job : 258025  
Client Project : 188BS23418  
Date Collected : 05/24/2023  
Date Received : 05/31/2023

Location :  
1011 Cobb St. , Kalamazoo , MI 49700

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
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Lab Supervisor/Other Signatory

Analyst:

OJ Ivey

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  
 A % Asbestos result of "Trace" indicates that the analyzed material was found to contain less than 1% asbestos and would not be considered an Asbestos Containing Material (ACM).

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38900 HURON RIVER DRIVE  
ROMULUS, MICHIGAN 48174  
(734) 955-6600  
FAX: (734) 992-2261  
www.2ell.com



**Bulk Asbestos  
Chain of Custody**

ETL Project #: 258025

<b>Client:</b> Atlas Technical Consultants	<b>Contact:</b> Rob Smith Phone: 248-669-5140	<b>Project Location/Name:</b> 1011 COBB ST. KALAMAZOO, MI 49704
<b>Address:</b> 46555 Humboldt Dr. Ste. 100 Novi, MI 48377	<b>Fax:</b> 248-669-5147 <b>E-mail:</b>	<b>Client Project #:</b> 188BS23418
<b>Please Provide Results:</b> <input checked="" type="checkbox"/> Email <input type="checkbox"/> Fax <input type="checkbox"/> Verbal <input type="checkbox"/> Other _____		<b>Date Sampled:</b> 5/24/2023

**Turnaround Time (TAT):**  RUSH  Same Day  24 hr  48 hr  Standard (3-5 days)  Other 72 hours

PLM Instructions (Check all that apply)	
<input checked="" type="checkbox"/> PLM EPA600/R-93/116, 1993 (Standard method)	<input checked="" type="checkbox"/> Stop at 1st Positive - <i>Clearly mark Homogenous Group</i>
Point Counting: <input type="checkbox"/> 400 Points* <input type="checkbox"/> NYSDOH ELAP 198.1, 2002*	
<input type="checkbox"/> Gravimetric Reduction* <input type="checkbox"/> NYSDOH ELAP 198.6, 2010*	
<input type="checkbox"/> PLM Non-Building Material (Dust, Wipe, Tape)	<input type="checkbox"/> Soil or Vermiculite Analysis*

\* Additional charge and turnaround may be required

Lab ID	Sample ID	Material Description	Sample Location	Quantity
1515173, 174 175	1-RM-A,B,C	Roofing Material	EA 5	
176, 177 178	2-VP-A,B,C	Vapor Paper (under roofing)	EA 5	
179, 180 181	3-WG-A,B,C	Window Glaze	EA 4	

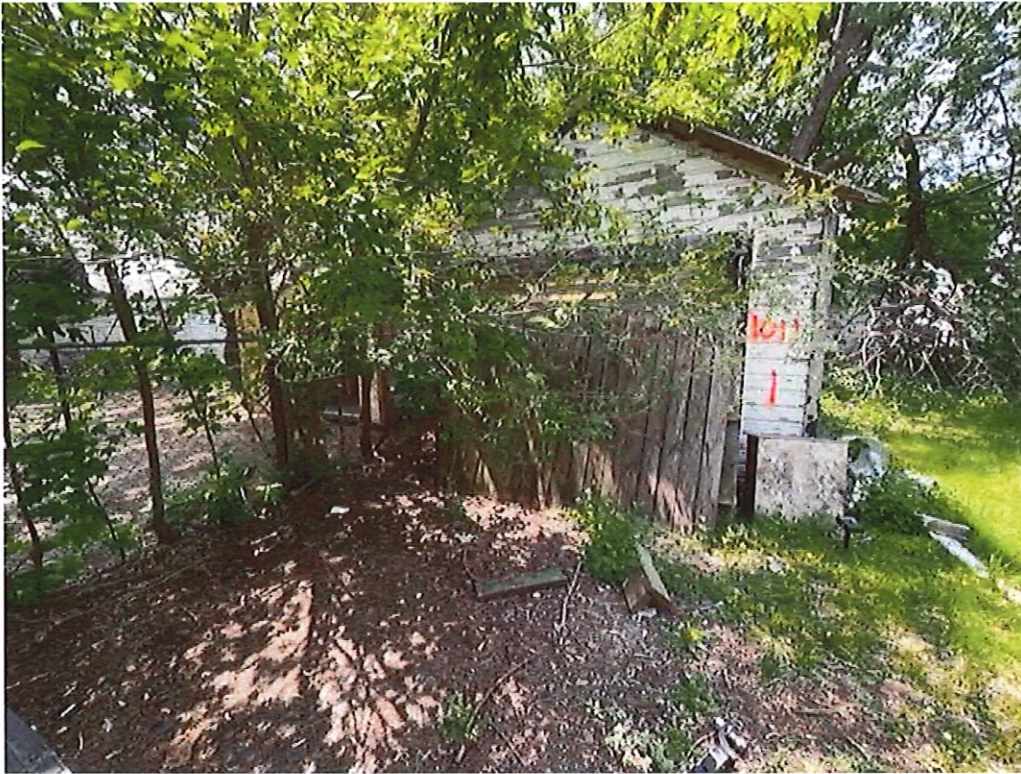
	Date	Time
Relinquished (Name/Organization):		
Received (Name/ETL):	5-31-23	3:13 am/pm
Sample Login (Name/ETL):	5-31-23	3:13 am/pm
Stereoscopic/Sample Analysis (Name/ETL):	6-5-23	1:47 am/pm
Results (Name/ETL):	6-5-23	1:47 am/pm
QA/QC Review (Name/ETL):	6-5-23	3:09 am/pm

Special Instructions: 1st Positive Stop; • Composite all drywall/joint compound samples if any layer of system is greater than 1% asbestos; • Point Count ALL PLASTER samples Trace to 3% asbestos content • Point Count ALL SAMPLES Trace to 1% asbestos content	Remarks
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\*\*IN ORDER TO ENSURE RESULTS BY SPECIFIED TAT, THE LAB MUST BE EMAILED/CALLED WITH THE QUANTITY OF SAMPLES TO BE SHIPPED OR DROPPED OFF

**ATTACHMENT B**  
**PHOTOGRAPHS**

ASBESTOS-CONTAINING MATERIAL SURVEY  
VACANT RESIDENTIAL PROPERTY  
1011 COBB STREET  
KALAMAZOO, MI 49007



Street view of the house located at 1011 Cobb Street (EA-1) / (EA-5)



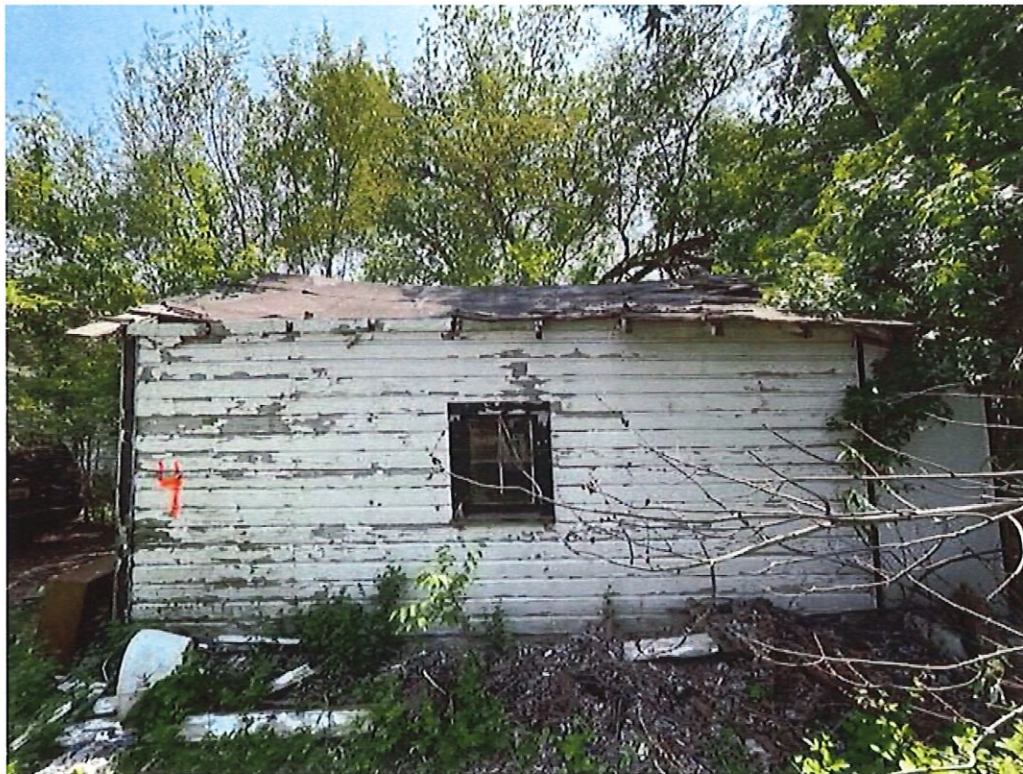
View of the left side of the house (EA-2)



ASBESTOS-CONTAINING MATERIAL SURVEY  
VACANT RESIDENTIAL PROPERTY  
1011 COBB STREET  
KALAMAZOO, MI 49007



View of the rear of the house (EA-3)



View of the right side of the house (EA-4)



ASBESTOS-CONTAINING MATERIAL SURVEY  
VACANT RESIDENTIAL PROPERTY  
1011 COBB STREET  
KALAMAZOO, MI 49007

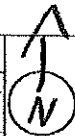


View of FS-1

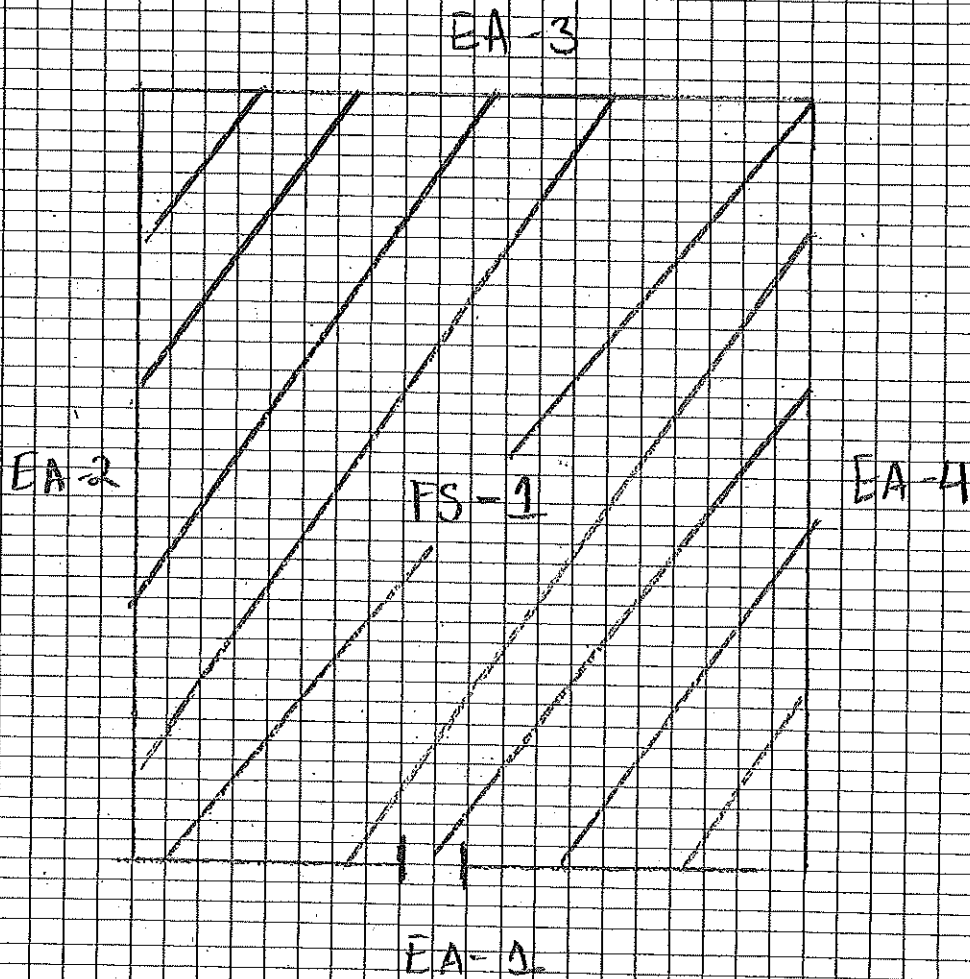


**ATTACHMENT C**  
**FUNCTIONAL SPACE MAPS**

Circle: (Attic) (1st Floor) (2nd Floor) (Basement) (Garage)



EA5  
ROOF



Cobb St

Street Address: 1011 Cobb

12

Inaccessible



20