



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:	188BS23599
Project Site Address (Subject Property):	728 W Lovell Street, Kalamazoo, MI 49007
Date of Site Visit:	August 25, 2023
Asbestos Inspection Performed by:	Andrew DeLodder (A48677)
Asbestos Inspector's Signature:	<i>Andrew DeLodder</i>
Areas Not Accessible:	None
Number of Floors:	1
Asbestos Present (Yes/No/Other):	Yes

On the date indicated above, State of Michigan Asbestos Inspector, Andrew DeLodder (A48677) 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 CATEGORY
2-WG-A,B,C	Window Glaze Replacement, Gray, Wooden Multi-Pane Windows	EA-1, FS-2	3 Windows	PLM 2% Chrysotile	Cat I

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	QUANTITY	RESULT
1-RM-A,B,C	Roofing Material- Asphalt Shingles	FS-1	600 SF	ND
2-WG-A,B,C	Window Glaze Replacement, Gray, Wooden Multi-Pane Windows	EA-1, FS-2	3 Windows	PLM 2% Chrysotile
3-WG-A,B,C	Window Glaze Replacement, Off-White, Soft (2'x6')	EA-1, FS-2	3 Windows	ND
4-CC-A,B,C	Concrete Chip- Poured Concrete Foundation	FS-1	525 SF	ND
5-VP-A,B,C	Vapor Paper- Brown, Stall Interiors	FS-1,2,3,4	100 SF	ND
6-BM-A,B,C	Brick Mortar- CMU Block Wall	FS-2,3	200 SF	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
**CRTs/ TV Screens/ Monitors/Electronics	FS-2, 3	3~ Various
**Automobile, Lawn Mower, Snow Blower	FS-3	1~ Lawn Mower
Misc. Items (Glue, Solvents, Cleaners, etc.)	FS-1,2,3,4	13~ Various
Paint Cans	FS-1,2,3,4	5~ Various
Tires	FS-4	1~ Car Tire
Gas Can	FS-4	1~ 5 Gallon

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

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

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

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



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

ETL Job: 261001
Client Project: 188BS23599

Attention: Robert Smith
Project Location: 728 Lovell Street, Kalamazoo, MI 49007
City of Kalamazoo ACM Survey

Lab Sample Number	Client Sample Number	Sample Type	Completed
1576293	1-RM-A	Asbestos	09/08/2023
1576294	1-RM-B	Asbestos	09/08/2023
1576295	1-RM-C	Asbestos	09/08/2023
1576296	2-WG-A	Asbestos	09/08/2023
1576297	2-WG-B	Asbestos	09/08/2023
1576298	2-WG-C	Asbestos	09/08/2023
1576299	3-WG-A	Asbestos	09/08/2023
1576300	3-WG-B	Asbestos	09/08/2023
1576301	3-WG-C	Asbestos	09/08/2023
1576302	4-CC-A	Asbestos	09/08/2023
1576303	4-CC-B	Asbestos	09/08/2023
1576304	4-CC-C	Asbestos	09/08/2023
1576305	5-VP-A	Asbestos	09/08/2023
1576306	5-VP-B	Asbestos	09/08/2023
1576307	5-VP-C	Asbestos	09/08/2023
1576308	6-BM-A	Asbestos	09/08/2023

Lab Sample Number	Client Sample Number	Sample Type	Completed
1576309	6-BM-B	Asbestos	09/08/2023
1576310	6-BM-C	Asbestos	09/08/2023

Reviewed by:



Jessica Dilworth

Summary

Method	Sample	Layer	Mastic
PLM	19		

Polarized Light Microscopy Asbestos Analysis Report

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

Location : 728 Lovell Street, Kalamazoo, MI 49007
 City of Kalamazoo ACM Survey

ETL Job : 261001

Client Project : 188BS23599

Date Collected : 08/25/2023

Date Received : 09/05/2023

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
1576293 1-RM-A	Roofing Material - Asphalt Shingle	Black Non-Fibrous Homogenous	PLM Trace Cellulose PLM 9% Fiberglass	PLM 91% Other	PLM None Detected
Layer-1 Analyst: James Farinas Date Analyzed : 09/08/2023					
1576294 1-RM-B	Roofing Material - Asphalt Shingle	Black Non-Fibrous Homogenous	PLM Trace Cellulose PLM 3% Fiberglass	PLM 97% Other	PLM None Detected
Layer-1 Analyst: James Farinas Date Analyzed : 09/08/2023					
1576295 1-RM-C	Roofing Material - Asphalt Shingle	Black Non-Fibrous Homogenous	PLM Trace Cellulose PLM 9% Fiberglass	PLM 91% Other	PLM None Detected
Layer-1 Analyst: James Farinas Date Analyzed : 09/08/2023					
1576296 2-WG-A	Window Glaze	Beige / Black Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 100% Other	PLM None Detected
Layer-1 Analyst: James Farinas Date Analyzed : 09/08/2023					
1576296 2-WG-A	Window Glaze	Grey / White Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 98% Other	PLM 2% Chrysotile
Layer-2 Analyst: James Farinas Date Analyzed : 09/08/2023					

Polarized Light Microscopy Asbestos Analysis Report

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

Location : 728 Lovell Street, Kalamazoo, MI 49007
 City of Kalamazoo ACM Survey

ETL Job : 261001

Client Project : 188BS23599

Date Collected : 08/25/2023

Date Received : 09/05/2023

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
1576297 2-WG-B	Window Glaze	Beige / Black Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 100% Other	PLM None Detected
Layer-1 Analyst: James Farinas Date Analyzed : 09/08/2023					
1576297 2-WG-B		Positive Stop			
Layer-2 Analyst: James Farinas Date Analyzed : 09/08/2023 Layer Not Analyzed					
1576298 2-WG-C	Window Glaze	Beige / Black Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 100% Other	PLM None Detected
Layer-1 Analyst: James Farinas Date Analyzed : 09/08/2023					
1576298 2-WG-C		Positive Stop			
Layer-2 Analyst: James Farinas Date Analyzed : 09/08/2023 Layer Not Analyzed					
1576299 3-WG-A	Window Glaze	Off-White Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 100% Other	PLM None Detected
Layer-1 Analyst: James Farinas Date Analyzed : 09/08/2023					
1576300 3-WG-B	Window Glaze	Off-White Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 100% Other	PLM None Detected
Layer-1 Analyst: James Farinas Date Analyzed : 09/08/2023					

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.

Polarized Light Microscopy Asbestos Analysis Report

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

ETL Job : 261001
Client Project : 188BS23599
Date Collected : 08/25/2023
Date Received : 09/05/2023

Location : 728 Lovell Street, Kalamazoo, MI 49007
 City of Kalamazoo ACM Survey

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
1576301 3-WG-C	Window Glaze	Off-White Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 100% Other	PLM None Detected
Layer-1 Analyst: James Farinas Date Analyzed : 09/08/2023					
1576302 4-CC-A	Concrete Chip	Grey Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 100% Other	PLM None Detected
Layer-1 Analyst: James Farinas Date Analyzed : 09/08/2023					
1576303 4-CC-B	Concrete Chip	Grey Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 100% Other	PLM None Detected
Layer-1 Analyst: James Farinas Date Analyzed : 09/08/2023					
1576304 4-CC-C	Concrete Chip	Grey Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 100% Other	PLM None Detected
Layer-1 Analyst: James Farinas Date Analyzed : 09/08/2023					
1576305 5-VP-A	Vapor Paper	Brown Fibrous Homogenous	PLM 99% Cellulose	PLM 1% Other	PLM None Detected
Layer-1 Analyst: James Farinas Date Analyzed : 09/08/2023					
1576306 5-VP-B	Vapor Paper	Brown Fibrous Homogenous	PLM 99% Cellulose	PLM 1% Other	PLM None Detected
Layer-1 Analyst: James Farinas Date Analyzed : 09/08/2023					

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Polarized Light Microscopy Asbestos Analysis Report

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

ETL Job : 261001
Client Project : 188BS23599
Date Collected : 08/25/2023
Date Received : 09/05/2023

Location : 728 Lovell Street, Kalamazoo, MI 49007
 City of Kalamazoo ACM Survey

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
1576307 5-VP-C	Vapor Paper	Brown Fibrous Homogenous	PLM 99% Cellulose	PLM 1% Other	PLM None Detected
Layer-1 Analyst: James Farinas Date Analyzed : 09/08/2023					
1576308 6-BM-A	Brick Mortar	Grey Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 100% Other	PLM None Detected
Layer-1 Analyst: James Farinas Date Analyzed : 09/08/2023					
1576309 6-BM-B	Brick Mortar	Grey Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 100% Other	PLM None Detected
Layer-1 Analyst: James Farinas Date Analyzed : 09/08/2023					
1576310 6-BM-C	Brick Mortar	Grey Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 100% Other	PLM None Detected
Layer-1 Analyst: James Farinas Date Analyzed : 09/08/2023					



Lab Supervisor/Other Signatory

Analyst:



James Farinas

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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ENVIRONMENTAL TESTING LABORATORIES, INC

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

**Bulk Asbestos
 Chain of Custody**

ETL Project #: 261001

Client: ATC Group Services	Contact: Rob Smith Phone: 248-669-5140	Project Location/name: 728 LOVELL STREET, KALAMAZOO, MICHIGAN 490017 / CITY OF KALAMAZOO ACM SURVEY
Address: 46555 Humboldt Dr. Ste. 100 Novi, MI 48377	Fax: 248-669-5147 E-mail: robert.smith@etlcs.com	Client Project #: 1888523599
Please Provide Results: <input type="checkbox"/> Email <input type="checkbox"/> Fax <input type="checkbox"/> Verbal <input type="checkbox"/> Other		Date Sampled: 8/25/2023

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

1576

Lab ID	Sample ID	Material Description	Sample Location	QUANTITY
243 274 295	1-RM-A,B,C	Roofing material - asphalt shingle	FS-1,	600 SF
296 297 298	2-WG-A,B,C	Window glaze replacement, grey, wooden multi-pane windows	EA-1, FS-2	3 windows
299 300 301	3-WG-A,B,C	Window glaze replacement, off-white, soft (2x6" windows)	EA-1, FS-2	3 windows
302 303 304	4-CC-A,B,C	Concrete chip - poured concrete foundation	FS-1	525 SF
305 306 307	5-VP-A,B,C	Vapor paper - brown, stall interiors	FS-1,2,3,4	100 SF
308 309 310	6-BM-A,B,C	Brick mortar - CMU block wall	FS-2,3	200 SF
	End of COC	End of COC	End of COC	End of COC

Relinquished (Name/Organization): Andrew DeLodder / Atlas Technical Consultants	Date: 8/25/2023	Time: 8:00pm
Received (Name/ETL): <i>[Signature]</i>	Date: 9-5-23	Time: 1400 am/pm
Sample Login (Name/ETL): <i>[Signature]</i>	Date: 9-5-23	Time: 1635 am/pm
Stereoscopic/Sample Analysis (Name/ETL): <i>[Signature]</i>	Date: 9/8/23	Time: 12:25 am/pm
Results (Name/ETL): <i>[Signature]</i>	Date: 9/8/23	Time: 12:25 am/pm
QA/QC Review (Name/ETL): <i>[Signature]</i>	Date: 9-8-23	Time: 1235 am/pm

Special Instructions: 1st Positive Stop;
 • Composite all drywall/joint compound/mud 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

****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
728 W LOVELL STREET
KALAMAZOO, MICHIGAN 49007



View of the south side of the garage exterior (EA-1)



View of the west side of the garage exterior (EA-2)

ASBESTOS-CONTAINING MATERIAL SURVEY
VACANT RESIDENTIAL PROPERTY
728 W LOVELL STREET
KALAMAZOO, MICHIGAN 49007



View of the north side of the garage exterior (EA-3)



View of the east side of the garage exterior (EA-4)

ASBESTOS-CONTAINING MATERIAL SURVEY
VACANT RESIDENTIAL PROPERTY
728 W LOVELL STREET
KALAMAZOO, MICHIGAN 49007



View of the garage roof (EA-5)



View of the garage interior; bay 1 (FS-1)

ASBESTOS-CONTAINING MATERIAL SURVEY
VACANT RESIDENTIAL PROPERTY
728 W LOVELL STREET
KALAMAZOO, MICHIGAN 49007



View of the garage interior; bay 2 (FS-2)



View of the garage interior; bay 3 (FS-3)

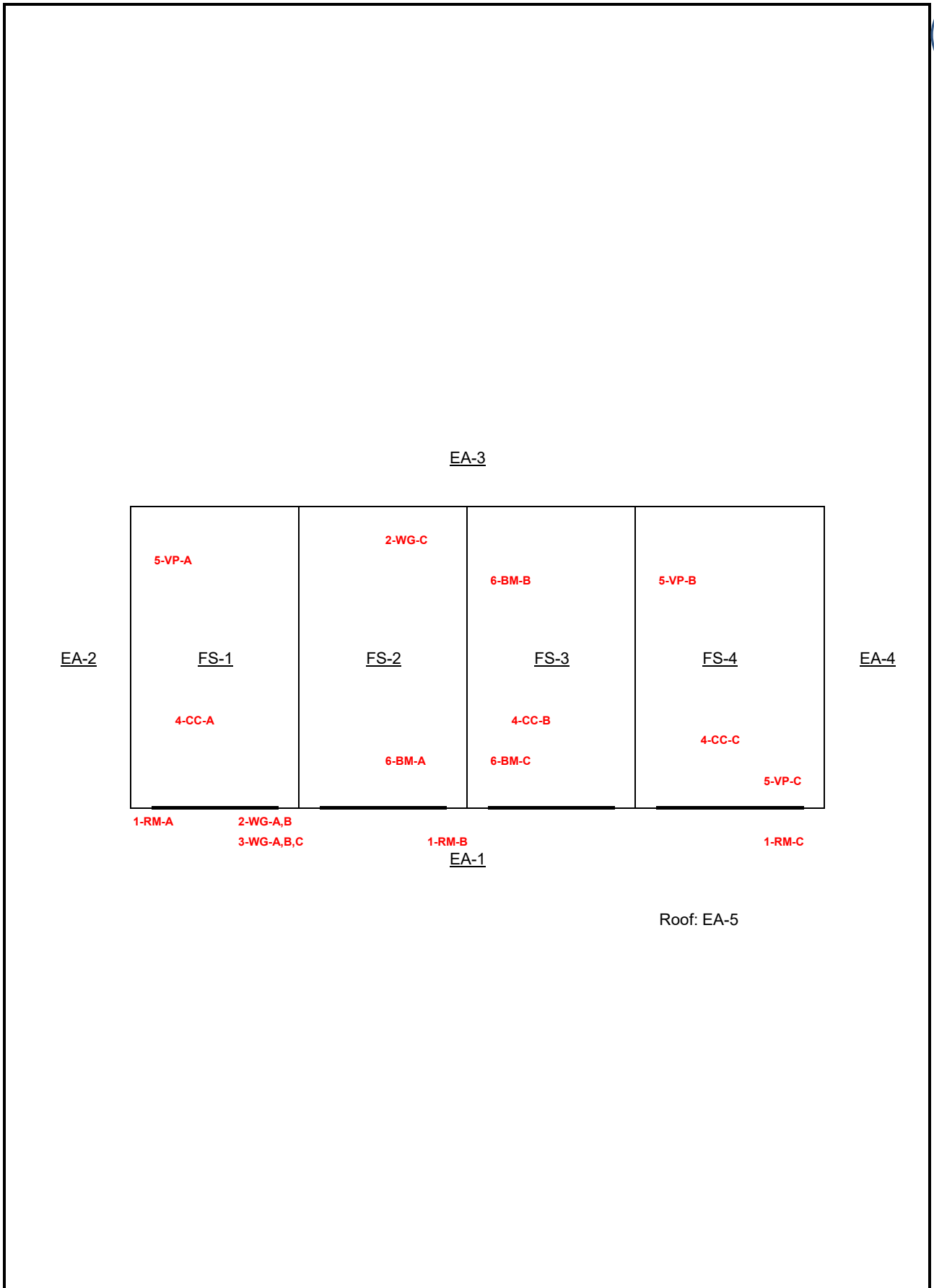
ASBESTOS-CONTAINING MATERIAL SURVEY
VACANT RESIDENTIAL PROPERTY
728 W LOVELL STREET
KALAMAZOO, MICHIGAN 49007



View of the garage interior; bay 4 (FS-4)

ATTACHMENT C
FUNCTIONAL SPACE MAPS

GARAGE



Street Address: 728 W Lovell Street, Kalamazoo, Michigan 49007

Inaccessible

