



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:	188BS23505
Project Site Address (Subject Property):	1224 Egleston, Kalamazoo, MI 49001
Date of Site Visit:	July 28, 2023
Asbestos Inspection Performed by:	Andrew DeLodder (A48677)
Asbestos Inspector's Signature:	<i>Andrew DeLodder</i>
Areas Not Accessible:	None
Number of Floors:	Garage Only
Asbestos Present (Yes/No/Other):	No asbestos identified in areas surveyed.

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
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- Asphalt Shingle, Greenish-Blue Debris in Garage Interior	FS-1, EA-5	ND
2-BM-A,B,C	Brick Mortar- Brick Garden Wall	EA-1	ND
3-VP-A,B,C	Vapor Paper- Roll of Black Vapor Paper in Garage Interior	FS-1	ND
4-WB-A,B,C	Wallboard- on Garage Interior Walls	FS-1	ND
5-FRB-A,B,C	Fiberboard- Garage overhead Roll-Up Door Board, Rough Texture	EA-3	ND
6-CC-A,B,C	Concrete Chip- Poured Concrete Foundation	FS-1	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
Misc. Items (Glue, Solvents, Cleaners, etc.)	FS-1	5
Paint Cans	FS-1	3
Tires	FS-1	2

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

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

DESCRIPTION	DESIGNATION
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:** 260132  
**Client Project:** 188BS2505

**Attention:** Robert Smith  
**Project Location:** 1224 Egleston, Kalamazoo, MI 49001  
City of Kalamazoo ACM Survey

Lab Sample Number	Client Sample Number	Sample Type	Completed
1564819	1-RM-A	Asbestos	08/04/2023
1564820	1-RM-B	Asbestos	08/04/2023
1564821	1-RM-C	Asbestos	08/04/2023
1564822	2-BM-A	Asbestos	08/04/2023
1564823	2-BM-B	Asbestos	08/04/2023
1564824	2-BM-C	Asbestos	08/04/2023
1564825	3-VP-A	Asbestos	08/04/2023
1564826	3-VP-B	Asbestos	08/04/2023
1564827	3-VP-C	Asbestos	08/04/2023
1564828	4-WB-A	Asbestos	08/04/2023
1564829	4-WB-B	Asbestos	08/04/2023
1564830	4-WB-C	Asbestos	08/04/2023
1564831	5-FRB-A	Asbestos	08/04/2023
1564832	5-FRB-B	Asbestos	08/04/2023
1564833	5-FRB-C	Asbestos	08/04/2023
1564834	6-CC-A	Asbestos	08/04/2023

Lab Sample Number	Client Sample Number	Sample Type	Completed
1564835	6-CC-B	Asbestos	08/04/2023
1564836	6-CC-C	Asbestos	08/04/2023

Reviewed by:

*Madeline Palmer*

Madeline Palmer

**Summary**

Method	Sample	Layer	Mastic
PLM	20		

## Polarized Light Microscopy Asbestos Analysis Report

**To :** Atlas - Novi  
 46555 Humboldt Dr. Suite 100  
 Novi, Michigan 48377  
  
**Location :** 1224 Egleston, Kalamazoo, MI 49001  
 City of Kalamazoo ACM Survey

**ETL Job :** 260132  
**Client Project :** 188BS2505  
**Date Collected :** 07/28/2023  
**Date Received :** 08/02/2023

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
1564819 1-RM-A	Roofing Mateiral	Green/Blue Fibrous Homogenous	PLM 10% Cellulose	PLM 90% Other	PLM None Detected
Layer-1 Analyst: Chris Canilao Date Analyzed : 08/04/2023					
1564819 1-RM-A	Roofing Mateiral	Gray Fibrous Homogenous	PLM 5% Cellulose	PLM 95% Other	PLM None Detected
Layer-2 Analyst: Chris Canilao Date Analyzed : 08/04/2023					
1564820 1-RM-B	Roofing Mateiral	Green/Blue Fibrous Homogenous	PLM 10% Cellulose	PLM 90% Other	PLM None Detected
Layer-1 Analyst: Chris Canilao Date Analyzed : 08/04/2023					
1564820 1-RM-B	Roofing Mateiral	Gray Fibrous Homogenous	PLM 5% Cellulose	PLM 95% Other	PLM None Detected
Layer-2 Analyst: Chris Canilao Date Analyzed : 08/04/2023					
1564821 1-RM-C	Roofing Mateiral	Green/Blue Fibrous Homogenous	PLM 10% Cellulose	PLM 90% Other	PLM None Detected
Layer-1 Analyst: Chris Canilao Date Analyzed : 08/04/2023					
1564822 2-BM-A	Brick Mortar	Gray Non-Fibrous Homogenous	PLM 2% Cellulose	PLM 98% Other	PLM None Detected
Layer-1 Analyst: Chris Canilao Date Analyzed : 08/04/2023					

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

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 Novi, Michigan 48377  
  
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 City of Kalamazoo ACM Survey

**ETL Job :** 260132  
**Client Project :** 188BS2505  
**Date Collected :** 07/28/2023  
**Date Received :** 08/02/2023

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
1564823 2-BM-B	Brick Mortar	Gray Non-Fibrous Homogenous	PLM 2% Cellulose	PLM 98% Other	PLM None Detected
Layer-1 Analyst: Chris Canilao Date Analyzed : 08/04/2023					
1564824 2-BM-C	Brick Mortar	Gray Non-Fibrous Homogenous	PLM 2% Cellulose	PLM 98% Other	PLM None Detected
Layer-1 Analyst: Chris Canilao Date Analyzed : 08/04/2023					
1564825 3-VP-A	Vapor Paper	Black Fibrous Homogenous	PLM 50% Cellulose	PLM 50% Other	PLM None Detected
Layer-1 Analyst: Chris Canilao Date Analyzed : 08/04/2023					
1564826 3-VP-B	Vapor Paper	Black Fibrous Homogenous	PLM 50% Cellulose	PLM 50% Other	PLM None Detected
Layer-1 Analyst: Chris Canilao Date Analyzed : 08/04/2023					
1564827 3-VP-C	Vapor Paper	Black Fibrous Homogenous	PLM 50% Cellulose	PLM 50% Other	PLM None Detected
Layer-1 Analyst: Chris Canilao Date Analyzed : 08/04/2023					
1564828 4-WB-A	Wallboard	White Non-Fibrous Homogenous	PLM 5% Cellulose	PLM 95% Other	PLM None Detected
Layer-1 Analyst: Chris Canilao Date Analyzed : 08/04/2023					

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## Polarized Light Microscopy Asbestos Analysis Report

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 City of Kalamazoo ACM Survey

**ETL Job :** 260132  
**Client Project :** 188BS2505  
**Date Collected :** 07/28/2023  
**Date Received :** 08/02/2023

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
1564829 4-WB-B	Wallboard	White Non-Fibrous Homogenous	PLM 5% Cellulose	PLM 95% Other	PLM None Detected
Layer-1 Analyst: Chris Canilao Date Analyzed : 08/04/2023					
1564830 4-WB-C	Wallboard	White Non-Fibrous Homogenous	PLM 5% Cellulose	PLM 95% Other	PLM None Detected
Layer-1 Analyst: Chris Canilao Date Analyzed : 08/04/2023					
1564831 5-FRB-A	Fiberboard	Gray Fibrous Homogenous	PLM 2% Cellulose	PLM 98% Other	PLM None Detected
Layer-1 Analyst: Chris Canilao Date Analyzed : 08/04/2023					
1564832 5-FRB-B	Fiberboard	Gray Fibrous Homogenous	PLM 2% Cellulose	PLM 98% Other	PLM None Detected
Layer-1 Analyst: Chris Canilao Date Analyzed : 08/04/2023					
1564833 5-FRB-C	Fiberboard	Gray Fibrous Homogenous	PLM 2% Cellulose	PLM 98% Other	PLM None Detected
Layer-1 Analyst: Chris Canilao Date Analyzed : 08/04/2023					
1564834 6-CC-A	Concrete Chip	Gray Non-Fibrous Homogenous	PLM 2% Cellulose	PLM 98% Other	PLM None Detected
Layer-1 Analyst: Chris Canilao Date Analyzed : 08/04/2023					

## Polarized Light Microscopy Asbestos Analysis Report

**To :** Atlas - Novi  
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 Novi, Michigan 48377  
  
**Location :** 1224 Egleston, Kalamazoo, MI 49001  
 City of Kalamazoo ACM Survey

**ETL Job :** 260132  
**Client Project :** 188BS2505  
**Date Collected :** 07/28/2023  
**Date Received :** 08/02/2023

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
1564835 6-CC-B	Concrete Chip	Gray Non-Fibrous Homogenous	PLM 2% Cellulose	PLM 98% Other	PLM None Detected
Layer-1 Analyst: Chris Canilao Date Analyzed : 08/04/2023					
1564836 6-CC-C	Concrete Chip	Gray Non-Fibrous Homogenous	PLM 2% Cellulose	PLM 98% Other	PLM None Detected
Layer-1 Analyst: Chris Canilao Date Analyzed : 08/04/2023					

*Jessica Dilutth*

Lab Supervisor/Other Signatory

Analyst:

*Chris Canilao*

Chris Canilao

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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**Bulk Asbestos  
 Chain of Custody**

ETL Project #: 260132

Client: ATC Group Services	Contact: <b>Rob Smith</b>	Project Location/name:	1224 EGLESTON, KALAMAZOO, MICHIGAN 49001 / CITY OF
	Phone: 248-669-5140		
Address: 46555 Humboldt Dr. Ste. 100 Novi, MI 48377	Fax: 248-669-5147		KALAMAZOO ACM SURVEY
	E-mail: <a href="mailto:robert.smith@atcgs.com">robert.smith@atcgs.com</a>	Client Project #:	188BS23505
Please Provide Results: <input type="checkbox"/> Email <input type="checkbox"/> Fax <input type="checkbox"/> Verbal <input type="checkbox"/> Other _____		Date Sampled:	7/28/2023

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 -
Point Counting: <input type="checkbox"/> 400 Points* <input type="checkbox"/> NYSDOH ELAP 198.1, 2002*	<i>Clearly mark Homogenous Group</i>
<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

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Lab ID	Sample ID	Material Description	Sample Location	QUANTITY
819, 20, 21	1-RM-A,B,C	Roofing material - asphalt shingle, greenish blue, debris in garage interior	FS-1, EA-5	600 SF
822, 23, 24	2-BM-A,B,C	Brick mortar - brick gargen wall	EA-1	20 SF
825, 26, 27	3-VP-A,B,C	Vapor paper - roll of black vapor paper in garage interior	FS-1	2 rolls
828, 29, 30	4-WB-A,B,C	Wallboard - on garage interior walls	FS-1	525 SF
831, 832, 33	5-FRB-A,B,C	Fiberboard - garage overhead roll-up door board, rough texture	EA-3	100 SF
834, 35, 36	6-CC-A,B,C	Concrete chip - poured garage foundation	FS-1	600 SF

	Date	Time
Relinquished (Name/Organization):	Andrew DeLodder / Atlas Technical Consultants	7/28/2023 12:00 AM
Received (Name/ETL):	<i>[Signature]</i>	8.2.23 9:46 am/pm
Sample Login (Name/ETL):	<i>[Signature]</i>	8.2.23 9:46 am/pm
Stereoscopic/Sample Analysis (Name/ETL):	<i>[Signature]</i>	8.4.23 4:00 am/pm
Results (Name/ETL):	<i>[Signature]</i>	8.4.23 4:00 am/pm
QA/QC Review (Name/ETL):	<i>[Signature]</i>	8.7.23 8:26 am/pm

<b>Special Instructions: 1st Positive Stop;</b> • 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
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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  
1224 EGLESTON AVENUE  
KALAMAZOO, MICHIGAN 49001



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



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



ASBESTOS-CONTAINING MATERIAL SURVEY  
VACANT RESIDENTIAL PROPERTY  
1224 EGLESTON AVENUE  
KALAMAZOO, MICHIGAN 49001



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



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



ASBESTOS-CONTAINING MATERIAL SURVEY  
VACANT RESIDENTIAL PROPERTY  
1224 EGLESTON AVENUE  
KALAMAZOO, MICHIGAN 49001



View of the garage roof (EA-5)

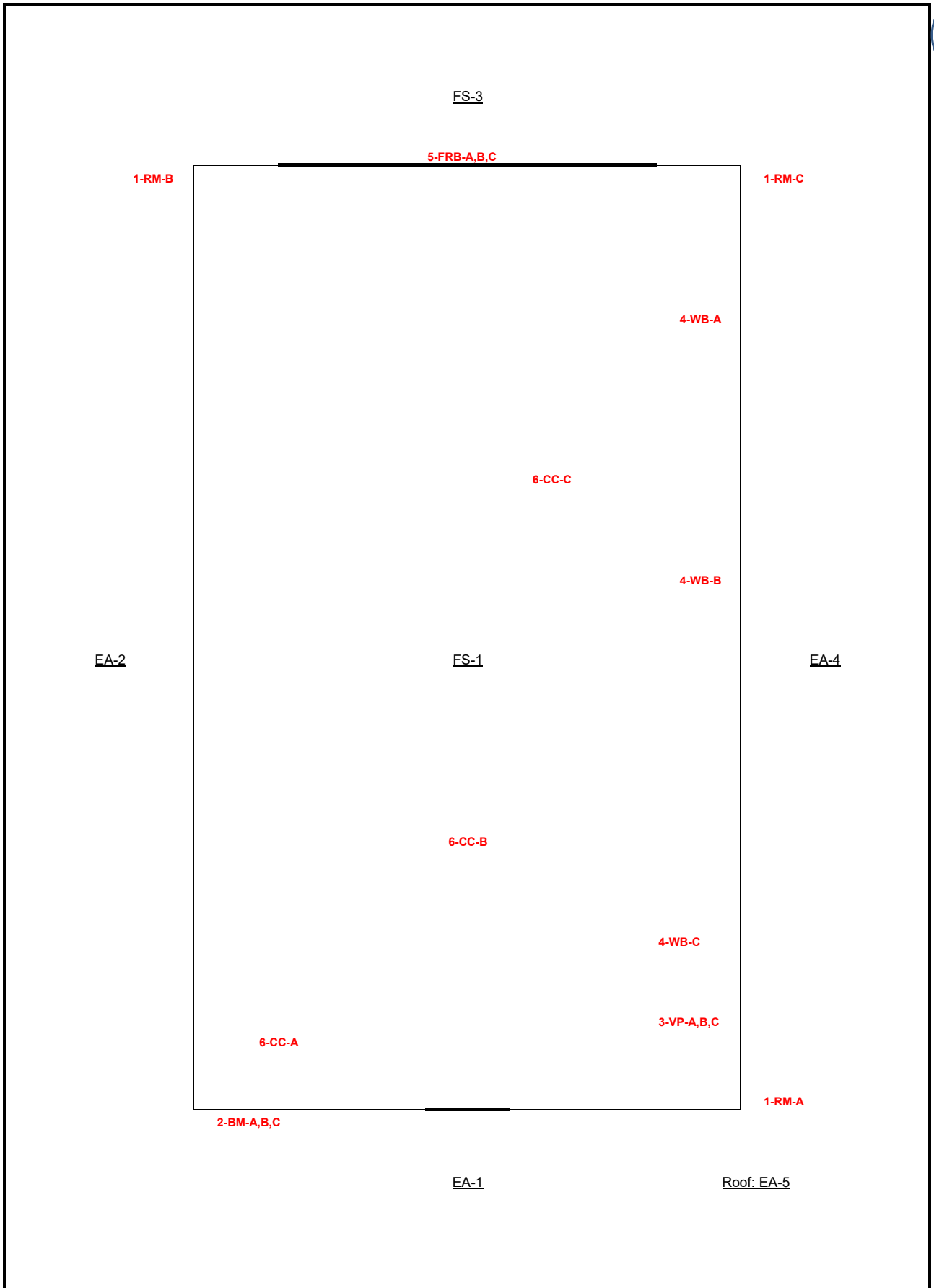


View of the garage interior (FS-1)



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

# GARAGE



Street Address: 1224 Egleston Avenue, Kalamazoo, Michigan 49001

Inaccessible

