

**Environmental and Occupational  
Consulting and Training, Inc.**

4000 Portage Road, Suite 100

Kalamazoo, MI 49001

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[www.eoct-ack.com](http://www.eoct-ack.com)

**Asbestos Survey Report**

**Cogswell Property, LLC**

**Powerhouse**

**431 Helen Avenue**

**Otsego, MI 49078**

**PREPARED FOR:**

Michael Davis

Cogswell Property, LLC

431 Helen Avenue

Otsego, MI

**INSPECTION PERFORMED BY:**

David Andrews

Michigan State Building Inspector

Accreditation # 1553

Adrian Quint

Michigan State Building Inspector

Accreditation # A 35755

Darwin Stout

Michigan State Building Inspector

Accreditation # A30414

**REPORT APPROVED BY:**

A. Clark Kahn III, Ph.D.

President, EOCT, Inc.

EOCT Project # 7495

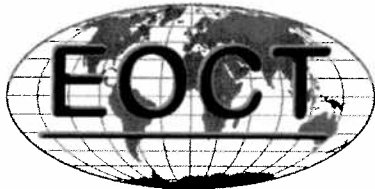
Environmental and Occupational Consulting and Training, Inc.

4000 Portage Road Suite 100

Kalamazoo, MI 49001

**DATE(S) OF INSPECTION**

May 6, 2008



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**Executive Summary**

Environmental and Occupational Consulting and Training, Inc. (EOCT) conducted an asbestos inspection of the Cogswell Property, LLC (Cogswell) facility at 431 Helen Avenue, Otsego, Michigan at the request of Michael Davis, president of Cogswell. The stated purpose of the inspection was to allow asbestos cleanup to resume followed by asbestos abatement and then demolition/renovation operations by Cogswell. The inspection of this former Rockwell-Tenn Paper Company was limited to the powerhouse, including the boiler room and turbine building, the basements under each of the previous stated, and the areas outside of the remaining buildings.

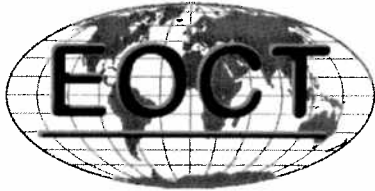
In general, the powerhouse, the turbine building, basements and some of the outside areas are contaminated with asbestos materials that were inappropriately removed over approximately the last year of demolition activities. The boiler room main level has several piles of debris that exceed an estimated 75 cubic yards of waste, all considered to be asbestos containing waste materials. The turbine building main level also has significant piles—approximately 15-20 additional cubic yards - of asbestos containing waste materials. Some of the waste materials in the basements are asbestos free, though there is some asbestos containing materials there as well. Because of the improper handling methods used to remove asbestos prior to March 2008, the vertical surfaces within the boiler room and turbine room and the horizontal surfaces above floor level show traces of asbestos contamination and are to be considered as asbestos containing materials.

Outside the building, there are alcoves on the north, west and south sides of the powerhouse that was checked for asbestos contamination. On the north side, the only asbestos found was installed on an eight inch feed line penetration. The west alcove had no contamination, and the south has several piles of asbestos containing waste materials because of the use of this area to haul materials out of the powerhouse. Additionally, a small amount of asbestos containing debris was located on the east wall of the powerhouse.

The presence of asbestos within the facility requires the owner and /or operator of the facility to comply with certain federal and state regulations relating to employees, other employers, tenants, and potential future employers. EOCT can help you fulfill these requirements.

Respectfully Submitted,

A. Clark Kahn III, Ph.D.



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#### **PURPOSE AND SCOPE AND WORK**

MDLEG Asbestos and MDEQ NESHP regulations require building owners to inspect facilities for the presence of asbestos. Environmental and Occupational Consulting and Training, Inc. (EOCT) of Kalamazoo, MI was contracted by Michael Davis, president, Cogswell Property, LLC to conduct this inspection to determine the amount, location, and condition of all friable and non-friable Asbestos Containing Building Materials (ACBM) located in the Cogswell Property Facility in Otsego, MI formerly Rockwell-Tenn Paper Company. All sampling, analysis, and assessment activities were conducted in accordance with the applicable sections of 40 CFR 763.

The EPA has determined that the following materials need not be assumed as ACBM:

- Wood
- Fiberglass Insulation
- Concrete
- Non Building Materials
- Glass
- Foam Rubber Insulation
- Steel

Except for the items listed above, all materials are assumed to contain asbestos unless they are sampled and proven to be non-ACM in accordance with the procedures in 40CFR763.86-88.

The rules are specific that *"When communicating information to employees pursuant to this standard, owners and employers shall identify "PACM" as ACM" (29CFR1926.1101(k)(1))*. The owner or employer may rebut the presumption of PACM being, in fact, ACM by sampling and analyses in accordance with USEPA AHERA rules. There are certain areas where it is more to the benefit of the owner to accept the presumption rather than sample; this would include areas where sampling could impair the integrity of vital components, or areas where the cost of accessing sample locations and the improbability of the PACM generating harmful fibers counter-indicate sampling.

#### **VISUAL INSPECTION OF HOMOGENEOUS AREAS.**

In accordance with USEPA AHERA rules, homogeneous areas of building materials were inspected as specified above for friability and conditions of deterioration by

- |                       |  |
|-----------------------|--|
| • David H Andrews Sr. | Michigan Asbestos Building Inspector A1553   |
| • Adrian Quint        | Michigan Asbestos Building Inspector A 35755 |
| • Darwin Stout        | Michigan Asbestos Building Inspector A30414  |

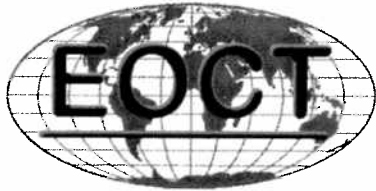
For each homogeneous area, the inspectors:

Visually inspected the area to identify the locations of all suspected ACBM.

- Touched all suspected ACBM to determine whether it was friable
- Identified all homogeneous areas of friable suspected ACBM and all homogeneous areas of non-friable suspected ACBM.
- Assumed that some or all of the homogenous areas are ACM, and,
- For each homogenous area that was not assumed to be ACM, collected bulk samples and submitted for asbestos analysis.
- Assessed friable material in areas where samples are collected and friable material in areas that are assumed to be ACBM.

To assist the owner/employer in the proper management of ACM it is categorized in several different ways:

- Friable or Non Friable;
- TSI, Surfacing or Miscellaneous Materials; and
- Good, Damaged, or Significantly Damaged condition.



✓

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The inspectors recorded the following:

- An inspection report with the date of the inspection signed by each accredited person making the inspection, State of accreditation, and if applicable, his or her accreditation number
- An inventory of the locations of the homogeneous areas where samples are collected, exact location where each bulk sample is collected, dates that samples are collected, homogeneous areas where friable suspected ACM is assumed to be ACM, homogeneous areas where non-friable suspected ACM is assumed to be ACM, and homogeneous areas where non-friable suspected ACM is assumed to be ACM.
- A description of the manner used to determine sampling locations, the name and signature of each accredited inspector who collected the samples, State of accreditation, and if applicable, his or her accreditation number. See Tab three
- A list of whether the homogeneous areas identified are surfacing material, thermal system insulation, or miscellaneous material.
- Assessments made of friable material, the name and signature of each accredited inspector making the assessment, State of accreditation, and if applicable, his or her accreditation number.

### **SAMPLE TECHNIQUES**

Samples 001 through 027 are contamination samples. These samples consisted of collection of loose dusts on the walls that were sampled by carefully brushing the brick or other vertical surface with a soldering flux brush and collecting the dust in a very small Ziploc bag. Samples numbered 1 – 6 and 14-17 were collected in this manner. Samples 1-6 were collected at about 5 foot above the main level while 14-17 were collected at 10 feet above the walking deck. At locations 1,2,3,4,and 14, cellophane tape was used to sample vertical surfaces as well. These are designated with a trailing "a". Samples 7-13 and 18-27 were collected on horizontal surfaces (angle bracing, top of door, window sills, etc) above the walking deck on the main floor of the powerhouse.

Most of the remaining samples were samples of debris piles that were throughout the powerhouse, and outside the building on three sides. These samples and intact insulation were sampled in accordance with standard sampling techniques in accordance with AHERA rules.

### **FINDINGS**

In the powerhouse, most of the debris pile samples indicate the presence of asbestos and hence, all debris within the powerhouse is considered to be asbestos containing material. Areas that are positive are indicated on the maps as red, while green indicated no asbestos found in the sample taken in this area, and orange indicate trace amounts of asbestos found. Outside the powerhouse, no debris on the north or west sides of the powerhouse were positive for asbestos. There is an amount of asbestos on the feed line penetration near the ground on the north side of the boiler room. There is a small amount of asbestos containing material on the east side of the powerhouse. The south side of the powerhouse was used as a loading and shipping area for the demolition activities that took place on site for the previous year. As such, there are several piles of debris, as shown on the map, that are positive for asbestos.

The boilers are approximately 18' X 21' X 28' high. The mud on the firebrick is about 4" thick. The volume of this material is about 25 cubic yard per boiler of asbestos containing mud.

Under the turbines- where the turbines originally were – it appears that the main steam lines and the majority of the extraction steam lines had ACM insulation. The turbine and all of these steam lines have been removed. The main steam would have come from the top of the two boilers while some of the extraction lines would have been directed to feed heaters, if they existed in this facility, or been directed straight to the deaerating feed tank in the northeast corner of the powerhouse. These lines and feed heaters no longer exist and it is unknown whether these lines would have still been ACM insulated or if the ACM had been replaced. Other uses of the extraction steam would have been as process steam in the paper mill. The paper machines were immediately west of the powerhouse. At the



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current time, the paper machines have been removed, and all of the steam and condensate piping has been removed. It is unknown what happened to the insulation originally encasing these lines.

Other than as discussed above, no visible asbestos was found outside the buildings on this site.

**LABORATORY INFORMATION**

Independent Analytical service of 5217 Shagbark Drive, Durham, North Carolina, 27703 has been contracted to provide analytical services for this project. All samples collected during this project were transported within rigid chain of custody procedures to protect sample integrity. Samples were analyzed for asbestos content by PLM, using the "Interim Method for the Determination of Asbestos in Bulk Insulation Samples" found at appendix E to subpart E of 40CFR76.

**DISCLAIMER**

All buildings contain building materials that are inaccessible except by destroying the structure. Additionally, some asbestos containing materials (ACM) may not be visible until renovation or demolition begins. While EOCT has exercised due diligence to discover all ACM existing within these structures, the owner and / or operator of this facility should be alert to the potential of undiscovered ACM and ACM in the building and should take all necessary precautions to prevent exposure to asbestos as a result of demolition or renovation activities. The owner/operator retains the responsibility to properly handle all asbestos discovered during any maintenance, renovation, or demolition activity. The owner has OSHA mandated notification responsibilities for tenants, employees and actual or potential employers that will be working in or near areas that contain asbestos.

Because previous demolition work had destroyed or rendered unsafe all installed ladders and stairs to partial decks above the main level, no EOCT employee was allowed to go above the main level to collect samples. Following cleanup activities, and at the start of abatement activities, suitable means to ascend safely will be used by EOCT to sample materials above the main level. Except for materials on the list in the purpose and scope section, all materials above the main level are assumed at this time to be asbestos containing materials.

**SUMMARY**

This inspection has determined the presence and location of asbestos containing materials present in the powerhouse of the Cogswell Property, LLC Facility in Otsego, MI. As a result of this presence of ACM, there are steps the owner and all on site employers must take to protect their employees and members of the general public. All demolition scenarios require prior removal and proper disposal of materials containing asbestos prior to actual demolition activities are performed that may disturb the matrix of the asbestos containing materials. EOCT can assist you in planning demolition activities that ensure that ACM is properly removed and disposed of in accordance with applicable Michigan rules and regulations.

The owner/operator of this facility also has responsibilities to inspect all other buildings on site for the presence, location, and amount of asbestos in accordance with 29CFR1910.1001(k), 29CFR1926.1101(k), and 40CFR61.145(a).



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**ATTACHMENTS**

- Table 1                Functional Spaces
- Table 2                Homogeneous Areas
- Table 3                Sample Analysis Results
- Example Notification of the Presence of Asbestos (ten day notification)
- Photographs        Areas Inspected for Asbestos
- Maps



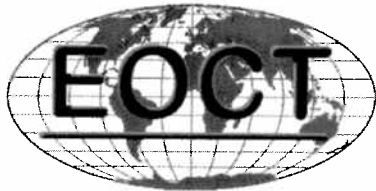
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*Asbestos Survey Report*  
**Cogswell Property, LLC**  
**Powerhouse**  
**431 Helen Avenue**  
**Otsego, MI 49078**

**Table 1 - Functional Areas**

FA #	Description of Area	Size Sq. Ft.	Asbestos Containing	Homogeneous Areas
FA #1	Boiler Room Main Level	7600	YES	1-5,9,10
FA#2	Boiler Room Basement	7600	YES	1,3-5,8-10
FA#3	Boiler Room Partial Deck above main level	1600	Assumed	2-5,9,10
FA#4	South Turbine Room	1842	YES	6,7,9,10
FA#5	South Turbine Basement	1842	YES	6,7,9,10
FA#6	North Turbine Room	972	YES	6,7,9,10
FA#7	North Turbine Basement	972	YES	6,7,9,10
FA#8	North PH Alcove	7200	YES	11-13
FA#9	West PH Alcove	400	NO	12,13
FA#10	East of PH (within 20 feet of wall)	140	YES	14
FA#11	South PH Alcove	7200	YES	15
FA#12	All areas outside buildings excluding FA# 8-11		NO	

Note that other buildings on site are outside the purview of this inspection and are not named.



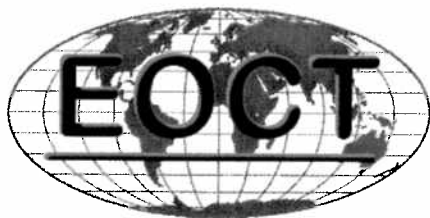
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**Table 2 - Homogeneous Areas**

HA #	Description of Area	Type Material	Size LFt, CuFt	Asbestos Containing	Functional Areas
HA#1	Debris Piles in Boiler Room	MM	7600 CuFt	YES	FA#1, 2
HA#2	Tank Insulation	TSI	260 CuFt	YES	FA#1, 3
HA#3	Furnace Mud Insulation	TSI	1450 Cu Ft	YES	FA#1, - 3
HA#4	Furnace Door Gaskets	TSI	1 CuFt	YES	FA#1, - 3
HA#5	Boiler piping	TSI	150 LFt	Yes	FA#1, - 3
HA#6	Turbine Extraction Piping	TSI	150 CuFt	YES	FA#4 - 7
HA#7	Turbine Building Debris Piles	MM	50 CuFt	Yes	FA#4 - 7
HA#8	Filter Tank Piping	TSI	90 CuFt	NO	FA# 2
HA#9	Vertical surfaces	MM	~35,000 SqFt	Yes	FA#1-7
HA#10	Horizontal Surfaces	MM	~3,000 Sq Ft	YES	FA#1-7
HA#11	Feed Penetration	TSI	2 LF	YES	FA#8
HA#12	Debris Piles in North and west alcoves	MM	25 CuFt	NO	FA#8, 9
HA#13	Horizontal Surfaces N&W Alcoves	MM		NO	FA#8,9
HA#14	Debris Piles east of Pwr Hse (within 20 feet of Pwr Hse wall)	MM	6 CuFt	YES	FA#10
HA#15	Debris Piles in South Alcove	MM	40 CuFt	YES	FA#11
HA#16	Environmental Surfaces Not Included above	MM		NO	FA#12





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May 12, 2008

Bulk Sample Analysis  
EOCT Project 7495

Mike Davis, Owner

Sample analyzed: 5-10-08

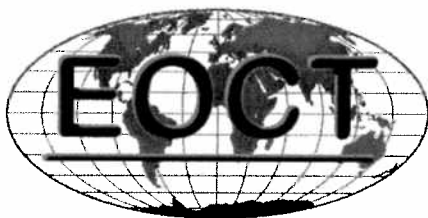
Cogswell Properties, LLC

431 Helen

Otsego, MI 49078

**Asbestos Analysis**

Sample No.	Sample Identification	Visual Description	Sample Contents (Percent %)	Contains Asbestos (%)
1	Dust-NE Corner of boiler Room on wall approximately 5' above floor	Gray & White	Synthetic Debris + +	None
1a	Tape-NE Corner of boiler room on wall approximately 5' above floor	Gray & Black	Cellulose Paint + +	None
2	Dust-NE Corner of boiler room 5' above floor	Gray & White	Cellulose <1 Hair <1 Fiberglass 15 Debris 80 Paint 5	None
3	Dust-SE Corner of boiler room on wall approximately 5' above floor	Gray & White	Cellulose <1 Paint 80 Sand 20	None
3a	Tape-SE Corner of boiler room on wall approximately 5' above floor	Gray & Green	Cellulose Paint + +	None
4	Dust-South wall of boiler room 5' above floor	Gray & White	Cellulose <1 Debris + Paint +	None
5	Dust-West wall, south end of boiler room 5' above floor	Gray & White	Cellulose <1 Debris + Paint +	None
5a	Tape-West wall, south end of boiler room 5' above floor	White & Silver	Cellulose Paint + +	None



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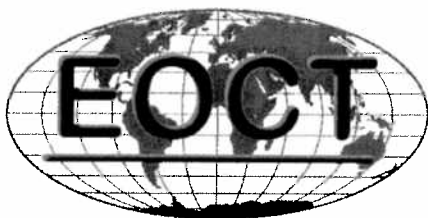
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Sample No.	Sample Identification	Visual Description	Sample Contents (Percent %)	Contains Asbestos (%)
6	Dust-North wall north of #2 boiler 5' above floor	Gray & White	Cellulose <1 Sand + Paint +	None
7	Debris-Window sill sample (East 5' above floor)	Gray & White	Cellulose + Fiberglass + Debris + Paint +	Yes-Chrysotile + Amosite +
8	Debris-Window sill sample (Middle 5' above floor)	Gray & White	Cellulose + Fiberglass + Debris + Paint +	Yes-Amosite +
9	Debris-Window sill sample (West 5' above floor)	Gray & White	Cellulose + Fiberglass + Debris + Paint +	Yes-Amosite +
10	Dust & Dirt-North side #2 boiler horizontal	Gray	Cellulose + Fiberglass + Debris +	Yes- Amosite +
11	Dust-#2 Boiler North vertical	White	Cellulose <1 Paint +	None
12	Dust-#1 Boiler (East) vertical	Silver & White	Cellulose <1 Sand + Paint +	None
13	Dust-#1 Boiler (East) horizontal	Gray & White	Cellulose + Fiberglass + Debris + Paint +	Yes- Chrysotile + Amosite +
14	Dust-North wall boiler ≈10' above floor	Gray & White	Cellulose <1 Debris + Paint +	None
14a	Tape-North wall boiler room ≈ 10' above floor	White	Cellulose + Paint +	None
15	Dust-South wall of boiler room approx. 10' above floor	Gray	Cellulose + Fiberglass + Insect Web + Debris +	Yes- Amosite +
16	Dust & Dirt-West wall of boiler room above	Brown	Cellulose <1 Debris +	None



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Sample No.	Sample Identification	Visual Description	Sample Contents (Percent %)	Contains Asbestos (%)
17	Debris-Locker room door approx. 10'	Brown	Cellulose <1 Debris +	None
18	Debris-Window sill west south (TB)	Gray & Black	Cellulose + Fiberglass + Debris +	Yes-Amosite +
19	Debris-Window sill west wall south (TB)	Gray & White	Cellulose + Fiberglass + Debris + Paint +	Yes-Amosite +
20	Debris-Window sill north wall (TB)	Gray	Cellulose + Fiberglass + Debris +	Yes-Amosite +
21	Dust-South wall turbine building (TB) light switch	White & Gray	Cellulose <1 Debris + Paint +	None
22	Dust-Turbine room turbine control panel	White & Gray	Cellulose <1 Debris + Paint +	None
23	Dust-Turbine building east wall CMS meter	Gray & White	Cellulose + Fiberglass + Debris + Paint +	Yes-Amosite +
24	Debris-North turbine building, north wall window sill	White & Gray	Cellulose <1 Debris + Paint +	None
25	Debris-North turbine building, northwest wall window sill	Gray & White	Cellulose + Fiberglass + Debris + Paint +	Yes-Amosite +
26	Dust-North turbine building, turbine control panel	White & Gray	Cellulose <1 Debris + Paint +	None
27	Dust-North turbine building, east handrail	Brown	Cellulose <1 Debris + Paint +	None



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Sample No.	Sample Identification	Visual Description	Sample Contents (Percent %)	Contains Asbestos (%)
####	Samples 28-39 are from outside in north alcove	#####	#####	#####
28	Dust- office building east window	Brown	Cellulose <1 Debris + Paint +	None
29	Dust-, top of office a/c units	Brown	Cellulose <1 Debris +	None
30	Dust-Seat of chair in north alcove	Brown & Black	Cellulose <1 Debris +	None
31	Plaster-Piece of insulation near to office building	White	Cellulose <1 Fiberglass <1 Plaster 100	None
32	Plaster-Debris pile next to office building	White	Cellulose <1 Fiberglass <1 Plaster 100	None
33	Debris-Dirt pile next to office building	Brown	Cellulose <1 Debris + Sand +	None
34	Granular Solids-Granular solids from former CST	Off White	Cellulose <1 Fiberglass <1 Binder 100	None
35	TSI-Off white insulation feedline penetration	White	Cellulose <1 Binder 60	Yes- Chrysotile 40%
36	TSI-Gray insulation feedline penetration	Gray	Cellulose <1 Binder 60	Yes- Chrysotile 40%
37	Debris Pile-Boiler room, turbine building- corner	Tan &Black	Cellulose <1 Fiberglass <1 Debris +	None
38	TSI Debris-West alcove SE corner debris	White	Synthetic 10 Fiberglass 10 Binder 80 Mica <1	None
39	Debris Pile- in road to boiler house	Off white	Cellulose <1 Fiberglass <1 Binder 100	None



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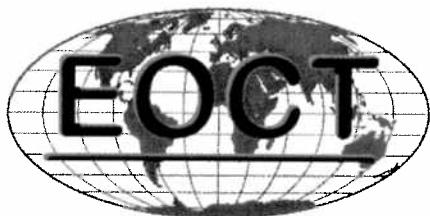
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Sample No.	Sample Identification	Visual Description	Sample Contents (Percent %)	Contains Asbestos (%)
####	Samples 40-43 taken from the east side of the powerhouse outside	#####	#####	#####
40	Debris Pile- 10' east of valves	Off White	Ceramic Wool 100	None
41	Debris Pile-Debris pile mid wall	Tan	Cellulose <1 Fiberglass <1 Binder 100	Yes- Chrysotile <1% Amosite <1%
42	Debris TSI-Debris by valves	Off White	Cellulose <1 Binder 70	Yes- Amosite 30%
43	Debris-Web belt between debris piles	Brown	Fiberglass 100 Debris <1	None
##	Samples 44-55 were taken outside in the south alcove	#####	#####	#####
44	Debris-Debris pile SE corner of alcove	Gray	Cellulose 100 Fiberglass <1 Debris <1	None
45	Debris-Debris pile under large access to building, SE corner of boiler room	Brown & White	Fiberglass <1 Debris 80 Binder 15	Yes-Amosite 5%
46	Debris-Debris pile NW corner of alcove	Brown & White	Fiberglass 5 Debris 75 Binder 15	Yes-Amosite 5%
47	Debris-Debris pile west end of south alcove	White & Gray	Fiberglass <1 Binder 60	Yes- Amosite 40%
48	Debris-Debris pile SW corner of alcove	Brown	Fiberglass 10 Cellulose 40 Debris 45	Yes-Amosite 5%
49	Debris-Debris Pile SE corner of alcove	Brown	Fiberglass 10 Cellulose 10 Debris 80	Yes- Amosite <1%
50	Insulation-Insulation debris center	Brown	Foam 100	None



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Sample No.	Sample Identification	Visual Description	Sample Contents (Percent %)		Contains Asbestos (%)
51	Debris-Center of south alcove	Gray & White	Cellulose	<1	None
			Fiberglass	<1	
			Debris	100	
52	Control				None
53	Control				None
54	Debris-Insulation debris outside east wall building 16	Brown	Cellulose	90	None
			Fiberglass	<1	
			Debris	10	
55	Debris-Window sill of store in downtown Otsego (immediately west of True Value Hardware)	Gray & White	Cellulose	<1	None
			Debris	100	
*****Samples 56-100 do not exist*****					
101	Debris Pile –NE corner by tank	Brown & White	Fiberglass	35	Yes-Amosite 5%
			Ceramic Wool	30	
102	Debris Pile-NW corner by east wall	Brown & White	Ceramic Wall	50	Yes-Amosite 5%
			Debris	10	
103	Debris-East wall from boiler #1	Tan	Fiberglass	25	None
			Perlite	75	
104	Debris Pile-East wall south of boiler #1	Tan & White	Fiberglass	10	Yes-Amosite 20%
			Perlite	40	
			Binder	30	
105	Debris-East side of boiler #1	Tan & White	Fiberglass	50	None
			Binder	50	
106	Firebrick Debris-East side of boiler #1 by feed tank side	Tan & White	Brick	100	None
107	Debris Pile-SE corner of boiler #1	Tan & White	Fiberglass	10	Yes-Amosite 20%
			Binder	70	
108	Debris Pile-South side of boiler #1	Off White	Cellulose	<1	Yes-Chrysotile 5%
			Fiberglass	5	
			Plaster	85	
			Binder	5	



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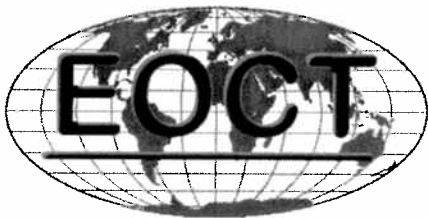
4000 Portage Road, Suite 201

Kalamazoo, MI 49001

Phone: (269) 383 6960

Fax: (269) 383 6967

Sample No.	Sample Identification	Visual Description	Sample Contents (Percent %)		Contains Asbestos (%)
109	Glue-South side of boiler #1	Blue	Glue	100	None
110	Debris-South side of boiler #1 SW Corner	Tan & White & Silver	Cellulose	<1	None
			Fiberglass	80	
			Foil	5	
			Vinyl	5	
			Debris	10	
111	Debris Pile-South wall access from boiler #1	Tan & Brown	Fiberglass	5	Yes- Amosite <1%
			Binder	95	
112	Debris Pile-South wall across from boiler #1	Brown & White	Leather	50	None
			Ceramic Wool	20	
			Binder	30	
			Mica	<1	
113	Debris Pile-South wall by southeast	Brown	Fiberglass	10	Yes-Amosite 5%
			Perlite	20	
			Debris	65	
114	Boiler Door Gasket-West side of boiler #1 NW corner access point boiler building	White	Ceramic Wool	100	None
115	Boiler Door Mud-West side of boiler #1 NW corner access point boiler building	White	Firebrick	100	None
116	Boiler Door Gasket-East side of boiler #2 NE corner access point	White & Tan	Debris	5	Yes- Chrysotile 95%
117	Boiler Door Mud-East side of boiler #2 NE corner access point	Gray & Black	Firebrick	60	None
			Rust	40	
118	Boiler Door Mud-East side of boiler #2	White & Brown	Fiberglass	35	Yes- Chrysotile 20%
			Binder	45	
119	Debris Pile-East side of boiler #2 NE corner	Black	Fiberglass	10	Yes- Chrysotile 3% Amosite-2%
			Debris	70	
			Binder	15	
120	Debris Pile-East side of boiler #2 NE corner	White	Fiberglass	10	Yes-Chrysotile 60%
			Binder	30	



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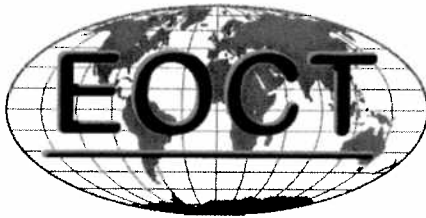
Kalamazoo, MI 49001

Phone: (269) 383 6960

Fax: (269) 383 6967

Sample No.	Sample Identification	Visual Description	Sample Contents (Percent %)		Contains Asbestos (%)
121	Debris Pile-West side of boiler #2 SW corner	Black & White	Fiberglass	80	Yes-Chrysotile 5%
			Binder	15	
122	Boiler Door Gasket- West side of boiler #2 NW corner access point	White & Tan	Debris	5	Yes-Chrysotile 95%
123	Debris Pile-West side of boiler #2 NW corner	Black & White	Fiberglass	20	Yes-
			Binder	35	Chrysotile 5%
			Debris	20	Amosite 20%
124	Debris Pile-West side of boiler #2 NW corner	Brown	Fiberglass	70	Yes-
			Debris	30	Chrysotile <1%
					Amosite <1%
125	TSI-North side of boiler #2 duct piping material from above	White	Binder	70	Yes-Amosite 30%
126	Debris Pile-West wall middle	Black & White	Cellulose	40	None
			Plaster	50	
			Tar	10	
127	Debris Pile-West wall, middle of boiler building	Gray	Fiberglass	10	Yes-
			Binder	50	Amosite 40%
128	Debris Pile-NW wall turbine builders track bay	White	Fiberglass	<1	Yes-
			Binder	60	Chrysotile 10%
					Amosite 30%
129	Debris Pile-NW wall turbine builders track bay	White	Cellulose	<1	None
			Binder	100	
			Mica	<1	
130	Debris Pile-North wall middle turbine building tracklay	White, Black & Red	Cellulose	50	None
			Fiberglass	10	
			Binder	35	
			Paint	5	
131	Debris Pile-Track bay SW corner	White	Fiberglass	5	Yes-
			Binder	75	Amosite 20%
			Mica	<1	
132	Debris Pile-Turbine building east side of pit	Black	Fiberglass	5	Yes-
			Debris	95	Amosite <1





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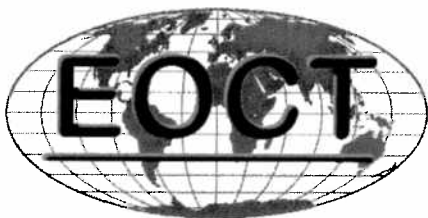
4000 Portage Road, Suite 201

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Sample No.	Sample Identification	Visual Description	Sample Contents (Percent %)		Contains Asbestos (%)
133	Debris Pile-Turbine building south wall, SE corner by door to Balor Building	White, Black & Red	Cellulose	50	None
			Fiberglass	10	
			Binder	35	
			Paint	5	
134	Debris Pile-Turbine building, west wall NW corne	Clear & Black	Cellulose	<1	None
			Fiberglass	<1	
			Mica	80	
			Debris	20	
135	Debris Pile-Turbine building north wall by windows and pit	Red & Black	Cellulose	<1	None
			Fiberglass	<1	
			Paint	10	
			Debris	90	
136	Window Putty-Turbine building north wall	Gray & Red	Caulk	95	Yes- Chrysotile 5%
137	Debris Pile-Boiler building SW corner	Clear & White	Salt	100	None
138	Debris Pile-Boiler building SW corner	Clear & Black	Cellulose	<1	None
			Fiberglass	<1	
			Salt	30	
			Debris	70	
139	Debris Pile-Boiler building south wall across from boiler#2	Tan & Black	Cellulose	<1	Yes- Chrysotile 40%
			Fiberglass	<1	
			Debris	55	
			Paint	5	
140	TSI-Boiler building NE corner feed tank, south side of tank	Gray & Orange	Fiberglass	60	None
			Binder	35	
			Rust	5	
141	TSI-Boiler building NE corner feed tank, south side of tank	Gray & White	Fiberglass	<1	Yes- Chrysotile 30%
			Binder	65	
			Paint	5	
142	TSI-Boiler building NE corner feed tank, south side of tank	Gray	Fiberglass	<1	Yes- Chrysotile 30%
			Binder	70	
143	Fiberboard-Boiler building basement, storage room #1 NE corner	Brown & Silver	Cellulose	90	None
			Foil	10	



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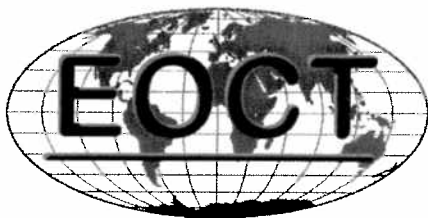
4000 Portage Road, Suite 201

Kalamazoo, MI 49001

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Sample No.	Sample Identification	Visual Description	Sample Contents (Percent %)		Contains Asbestos (%)
144	Stack Foundation Debris-Boiler building basement old stack foundation	Red & Black	Fiberglass	<1	None
			Rust	80	
			Debris	20	
145	Debris Pile-Boiler building basement north of old stack foundation	Black	Fiberglass	60	Yes-
			Debris	35	Amosite 5%
146	Pipe Insulation-Boiler building basement west of boiler #2 4" piping	Yellow & Silver	Cellulose	15	None
			Fiberglass	70	
			Foil	10	
			Mastic	5	
147	TSI-Boiler building basement north side of boiler #2 mud drum TSI	White	Binder	65	Yes-
					Chrysotile 5%
					Amosite 30%
148	Pipe Insulation-Boiler building basement north side of tank #1 side	Yellow & Silver	Cellulose	15	None
			Fiberglass	70	
			Foil	10	
			Mastic	5	
149	Tank TSI-Boiler building basement north side of tank #1 top	White	Cellulose	<1	None
			Fiberglass	5	
			Binder	95	
150	Tank TSI-Boiler building basement north side tank #2 top	White	Cellulose	<1	None
			Fiberglass	5	
			Binder	95	
151	Tank TSI-Boiler building basement north side tank #2 bottom	White	Cellulose	<1	None
			Fiberglass	5	
			Binder	95	
152	Tank TSI-Boiler building basement north side tank #3 top	White	Cellulose	<1	None
			Fiberglass	5	
			Binder	95	
153	Pipe Insulation-Boiler building basement north side tank #3 side	Orange & Silver	Cellulose	15	None
			Fiberglass	70	
			Foil	10	
			Mastic	5	
154	Tank TSI-Boiler building basement north side tank #3 bottom	White	Cellulose	<1	None
			Fiberglass	5	
			Binder	95	



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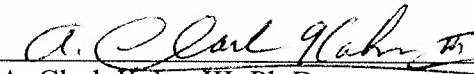
Kalamazoo, MI 49001

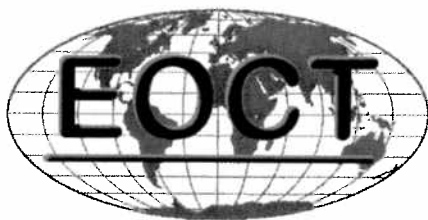
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155	Pipe TSI-Turbine building basement off piping	White	Cellulose 10 Synthetic 10 Binder 80	None
156	Tank coating- Boiler building basement NE corner	Red & White	Cellulose <1 Fiberglass <1 Binder 100 Paint <1	None
157	Pipe TSI-Turbine building basement off 6" piping outer layer	White & Grey	Cellulose 35 Fiberglass 5 Binder 55 Paint 5	None
158	Pipe TSI-Turbine building basement off 6" piping inner layer	Grey	Binder 40 cellulose <1	Yes- Amosite 60%
159	Debris pile Turbine building north room basement	Grey & White	Cellulose <1 Fiberglass 5 Binder 70 Synthetic 5 Mica <1	Yes- Amosite 20%
160	Cloth-Boiler building basement SE corner	Brown	Synthetic 100	None
161	Insulation debris- Turbine building basement east side of turbine base	Grey & White	Fiberglass 15 Binder 65 Cellulose <1	Yes- Chrysotile 20%
162	Insulation debris- Turbine building basement west side of turbine base	Grey & White	Fiberglass 10 Binder 55 Cellulose 35	None
163	Insulation debris- Turbine building basement north side of turbine base	Grey & White	Fiberglass 10 Binder 55 Cellulose 35	None
164	Debris-Boiler building basement under boiler #2 east side	Grey & White	Fiberglass 15 Binder 65 Cellulose <1	Yes- Amosite 20%

Samples were analyzed by an independent laboratory using the EPA 600 method:  
Independent Analytical Service, Durham, NC 27703

  
A. Clark Kahn, III, Ph.D.  
President



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**SUMMARY OF POSITIVE RESULTS**

Sample No.	Sample Identification	Visual Description	Sample Contents (Percent %)	Contains Asbestos (%)
7	Debris-Window sill sample (East 5' above floor)	Gray & White	Cellulose + Fiberglass + Debris + Paint +	Yes-Chrysotile + Amosite +
8	Debris-Window sill sample (Middle 5' above floor)	Gray & White	Cellulose + Fiberglass + Debris + Paint +	Yes-Amosite +
9	Debris-Window sill sample (West 5' above floor)	Gray & White	Cellulose + Fiberglass + Debris + Paint +	Yes-Amosite +
10	Dust & Dirt-North side #2 boiler horizontal	Gray	Cellulose + Fiberglass + Debris +	Yes- Amosite +
13	Dust-#1 Boiler (East) horizontal	Gray & White	Cellulose + Fiberglass + Debris + Paint +	Yes- Chrysotile + Amosite +
15	Dust-South wall of boiler room approx. 10' above floor	Gray	Cellulose + Fiberglass + Insect Web + Debris +	Amosite +
18	Debris-Window sill west south (TB)	Gray & Black	Cellulose + Fiberglass + Debris +	Yes-Amosite +
19	Debris-Window sill west wall south (TB)	Gray & White	Cellulose + Fiberglass + Debris + Paint +	Yes-Amosite +
20	Debris-Window sill north wall (TB)	Gray	Cellulose + Fiberglass + Debris +	Yes-Amosite +
23	Dust-Turbine building east wall CMS meter	Gray & White	Cellulose + Fiberglass + Debris + Paint +	Yes-Amosite +



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Sample No.	Sample Identification	Visual Description	Sample Contents (Percent %)	Contains Asbestos (%)
25	Debris-North turbine building, northwest wall window sill	Gray & White	Cellulose + Fiberglass + Debris + Paint +	Yes-Amosite +
35	TSI-Off white insulation feedline penetration	White	Cellulose <1 Binder 60	Yes-Chrysotile 40%
36	TSI-Gray insulation feedline penetration	Gray	Cellulose <1 Binder 60	Yes-Chrysotile 40%
41	Debris Pile-Debris pile mid wall	Tan	Cellulose <1 Fiberglass <1 Binder 100	Yes-Chrysotile <1% Amosite <1%
42	Debris TSI-Debris by valves	Off White	Cellulose <1 Binder 70	Yes-Amosite 30%
45	Debris-Debris pile under large access to building, SE corner of boiler room	Brown & White	Fiberglass <1 Debris 80 Binder 15	Yes-Amosite 5%
46	Debris-Debris pile NW corner of alcove	Brown & White	Fiberglass 5 Debris 75 Binder 15	Yes-Amosite 5%
47	Debris-Debris pile west end of south alcove	White & Gray	Fiberglass <1 Binder 60	Yes-Amosite 40%
48	Debris-Debris pile SW corner of alcove	Brown	Fiberglass 10 Cellulose 40 Debris 45	Yes-Amosite 5%
49	Debris-Debris Pile SE corner of alcove	Brown	Fiberglass 10 Cellulose 10 Debris 80	Yes-Amosite <1%



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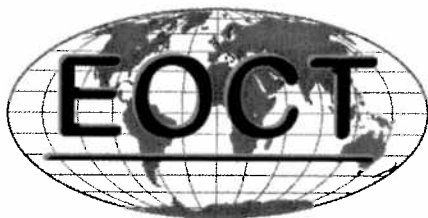
4000 Portage Road, Suite 201

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Sample No.	Sample Identification	Visual Description	Sample Contents (Percent %)	Contains Asbestos (%)
101	Debris Pile –NE corner by tank	Brown & White	Fiberglass 35 Ceramic Wool 30	Yes-Amosite 5%
102	Debris Pile-NW corner by east wall	Brown & White	Ceramic Wall 50 Debris 10	Yes-Amosite 5%
104	Debris Pile-East wall south of boiler #1	Tan & White	Fiberglass 10 Perlite 40 Binder 30	Yes-Amosite 20%
107	Debris Pile-SE corner of boiler #1	Tan & White	Fiberglass 10 Binder 70	Yes-Amosite 20%
108	Debris Pile-South side of boiler #1	Off White	Cellulose <1 Fiberglass 5 Plaster 85 Binder 5	Yes-Chrysotile 5%
111	Debris Pile-South wall access from boiler #1	Tan & Brown	Fiberglass 5 Binder 95	Yes-Amosite <1%
113	Debris Pile-South wall by southeast	Brown	Fiberglass 10 Perlite 20 Debris 65	Yes-Amosite 5%
116	Boiler Door Gasket-East side of boiler #2 NE corner access point	White & Tan	Debris 5	Yes-Chrysotile 95%
118	Boiler Door Mud-East side of boiler #2	White & Brown	Fiberglass 35 Binder 45	Yes-Chrysotile 20%
119	Debris Pile-East side of boiler #2 NE corner	Black	Fiberglass 10 Debris 70 Binder 15	Yes-Chrysotile 3% Amosite-2%
120	Debris Pile-East side of boiler #2 NE corner	White	Fiberglass 10 Binder 30	Yes-Chrysotile 60%
121	Debris Pile-West side of boiler #2 SW corner	Black & White	Fiberglass 80 Binder 15	Yes-Chrysotile 5%
122	Boiler Door Gasket- West side of boiler #2 NW corner access point	White & Tan	Debris 5	Yes-Chrysotile 95%



## Environmental and Occupational Consulting and Training, Inc.

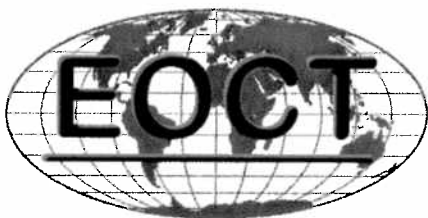
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123	Debris Pile-West side of boiler #2 NW corner	Black & White	Fiberglass Binder Debris	20 35 20	Yes- Chrysotile 5% Amosite 20%
124	Debris Pile-West side of boiler #2 NW corner	Brown	Fiberglass Debris	70 30	Yes- Chrysotile <1% Amosite <1%
125	TSI-North side of boiler #2 duct piping material from above	White	Binder	70	Yes- Amosite 30%
Sample No.	Sample Identification	Visual Description	Sample Contents (Percent %)		Contains Asbestos (%)
127	Debris Pile-West wall, middle of boiler building	Gray	Fiberglass Binder	10 50	Yes- Amosite 40%
128	Debris Pile-NW wall turbine builders track bay	White	Fiberglass Binder	<1 60	Yes- Chrysotile 10% Amosite 30%
131	Debris Pile-Track bay SW corner	White	Fiberglass Binder Mica	5 75 <1	Yes- Amosite 20%
132	Debris Pile-Turbine building east side of pit	Black	Fiberglass Debris	5 95	Yes- Amosite <1
136	Window Putty-Turbine building north wall	Gray & Red	Caulk	95	Yes- Chrysotile 5%
139	Debris Pile-Boiler building south wall across from boiler#2	Tan & Black	Cellulose Fiberglass Debris Paint	<1 <1 55 5	Yes- Chrysotile 40%
141	TSI-Boiler building NE corner feed tank, south side of tank	Gray & White	Fiberglass Binder Paint	<1 65 5	Yes- Chrysotile 30%
142	TSI-Boiler building NE corner feed tank, south side of tank	Gray	Fiberglass Binder	<1 70	Yes- Chrysotile 30%
145	Debris Pile-Boiler building basement north of old stack foundation	Black	Fiberglass Debris	60 35	Yes- Amosite 5%



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Sample No.	Sample Identification	Visual Description	Sample Contents (Percent %)	Contains Asbestos (%)
147	TSI-Boiler building basement north side of boiler #2 mud drum TSI	White	Binder 65	Yes- Chrysotile 5% Amosite 30%
158	Pipe TSI-Turbine building basement off 6" piping inner layer	Grey	Binder 40 cellulose <1	Yes- Amosite 60%
159	Debris pile Turbine building north room basement	Grey & White	Cellulose <1 Fiberglass 5 Binder 70 Synthetic 5 Mica <1	Yes- Amosite 20%
161	Insulation debris- Turbine building basement east side of turbine base	Grey & White	Fiberglass 15 Binder 65 Cellulose <1	Yes- Chrysotile 20%
164	Debris-Boiler building basement under boiler #2 east side	Grey & White	Fiberglass 15 Binder 65 Cellulose <1	Yes- Amosite 20%

A. Clark Kahn III, Ph.D.

President





**MDEQ/MDLEG USE ONLY**

Postmark Date \_\_\_\_/\_\_\_\_/\_\_\_\_ Rec'd Date \_\_\_\_/\_\_\_\_/\_\_\_\_

☐ OK ☐ Send Def Ltr. Date of Def Ltr. \_\_\_\_/\_\_\_\_/\_\_\_\_

FOLLOW UP \_\_\_\_/\_\_\_\_/\_\_\_\_ Spoke w/ \_\_\_\_

Comments: \_\_\_\_\_

Notification No. \_\_\_\_\_ Trans No. \_\_\_\_\_

Calculate MDLEG Asbestos Project Fee: (1% Project Fee)

Total Project Cost: \_\_\_\_\_ x 0.01 = \_\_\_\_\_

Type of Contractor \_\_\_\_\_ License No. \_\_\_\_\_

Licensing Authority \_\_\_\_\_

**I. NOTIFICATION:**

Date of Notification \_\_\_\_\_

Date of Revision(s) \_\_\_\_\_

Notification Type ☐ Original ☐ Revised ☐ Canceled ☐ Annual

Mark appropriate boxes: (both NESHP and MDLEG may apply):

NESHP (MDEQ) [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

MDLEG [Will not accept annual notifications]

☐ Demo Reno. Encap (>10 ln. ft./15 sq. ft.) 10 calendar days notice

☐ Emergency Renovation/Encapsulation

**II. 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.

**0. IS ASBESTOS PRESENT?**

☐ Yes ☐ No

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)

**3. ABATEMENT CONTRACTOR:**

Internal Project # \_\_\_\_\_

Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_

Contact: \_\_\_\_\_ Phone: \_\_\_\_\_

**4. DEMOLITION CONTRACTOR:**

Internal Project # \_\_\_\_\_

Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_

Contact: \_\_\_\_\_ Phone: \_\_\_\_\_

**5. FACILITY OWNER: ("Facility" includes Bridges)**

Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_

Contact: \_\_\_\_\_ Phone: \_\_\_\_\_

**6. FACILITY DESCRIPTION:**

Facility Name: \_\_\_\_\_

Location Address/Description: \_\_\_\_\_

\_\_\_\_\_ If Apt. # or 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 NESHP 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: \_\_\_\_\_