ALPENA COUNTY LAND BANK AUTHORITY

REQUEST FOR PROPOSAL: DEMOLITION SERVICES – 1315 W CHISHOLM ST

BLIGHT ELIMINATION PROGRAM ROUND 3

IMPORTANT DATES:

EVENT	DATE DUE	TIME DUE	METHOD OF COMMUNICATION
RFP RELEASE	OCTOBER 15, 2025		
SITE VISIT	OCTOBER 24, 2025	3:00 PM	Site Visit at 1315 W Chisholm Street with the City of Alpena and Huron Engineering
QUESTIONS AND ANSWERS TO RFP	NOVEMBER 4, 2025	5:00 PM	Direct all questions to: montielb@alpena.mi.us
RFP RESPONSE DUE	NOVEMBER 5, 2025	4:00 PM	Montiel Birmingham 208 N First Ave Alpena MI 49707 or Cindy Cebula 720 W Chisholm St Suite 3 Alpena MI 49707
SEALED BID OPENING	NOVEMBER 6, 2025	9:00 AM	Howard Male Conference Room of the Alpena County Annex Building, 719 W Chisholm St., Alpena, MI
RFP DECISION	NOVEMBER 7, 2025	3:00 PM	Howard Male Conference Room of the Alpena County Annex Building, 719 W Chisholm St., Alpena, MI – confirmation of decision will be emailed to all bidders
DEMO SCHEDULE	Within 30 days of notice to proceed if weather allows – otherwise, the latest possible date for demolition to be completed shall be June 1, 2026. See 2.1.9.		

Please check your submission to make sure you have included all of the information which is required in the Request for Proposal. Late submissions will not be accepted.

Contents

DESCRIPTION

1.1 The Alpena County Land Bank Authority (ACLBA), in partnership with the City of Alpena, is soliciting proposals from qualified vendors to perform Demolition services on a property within the city of Alpena, MI. This RFP is open to all qualified demolition contractors who are capable and qualified to meet the objectives and requirements described in this document. Qualified Respondent(s)s must supply documentation supporting their qualifications for evaluation. Below is a summary of the property.

1315 W Chisholm St, Alpena MI 49707
Parcel 093-637-000-955-00
Intent: Commercial Demolition
Requires:

- Demolition and Site Restoration – State of Michigan license is not required; however, demonstrated experience with residential or commercial demolitions is required. See the Deliverables and Inspections section for more information.
- Property is located on the Thunder Bay River and requires a Soil Erosion and Sedimentation Control permit; the permit must be pulled by the contractor.
- An ELGE floodplain permit is not required.
- A Pre-Bid meeting will take place on October 24th at 3:00 PM to walk the site and answer any questions.
- Bids at or above $50,000 require a performance bond in the amount of the bid.

1.2 This Request for Proposal includes site photos, a demolition site plan from Huron Engineering, and a Demo Phase Environmental Construction Management Plan written by Otwell Mawby.

1.3 The ACLBA has an access agreement in place to conduct the scope of services required under this RFP; coordination with the City of Alpena, Alpena County Land Bank Authority, and the property owner is required.

1.4 The survey contractor shall not also serve as the abatement contractor.

1.5 The contractor shall submit copies of Michigan licensure for demolition activities as outlined in this RFP if required.

1.6 The contractor shall submit a copy of their insurance information as outlined in Appendix B.

1.7 This RFP is issued by the ACLBA under a State Land Bank Authority Blight Elimination Grant utilizing federal funding; associated grant requirements apply to this scope of work and are outlined as applicable.

1.8 Modifications to this Request for Proposal, if any, shall take the form of one or more written addenda. Such addenda shall be considered as part of the original Request for Proposal.

1.9 A contract agreement will be executed between the ACLBA and the selected contractor post bid-award. The contract will contain language pertaining to compliance with federal requirements, including but not limited to document retention (through December 31, 2031) and additional requirements if the contract is over $100,000. The ACLBA will review the list of contractors debarred, suspended, or otherwise excluded from receiving federal funds and will not enter into a contract with a vendor on this exclusion list.

SCOPE OF WORK

2.1 **Demolition of Structure:** The Scope of Work ("Work") for this RFP may include, but is not necessarily limited to:

2.1.1 Security: Provide site security for duration of project after notice to proceed is received and project work has begun. Coordination with the City of Alpena for planned Right-of-Way closures is required. City of Alpena Department of Public Works may be able to assist with barricades if needed with 72 hours advanced notice.

2.1.2 Mobilization: Includes all labor, equipment, materials, and incidentals to mobilize to the project site to perform the work, including but not limited to contractor office support, project meetings, site visits, site security, temporary controls and utilities, pre-work submittals, required permitting, personal protective equipment, disposal approvals, erosion controls, barricades, traffic control, trash disposal, cleaning, and demobilization.

2.1.3 Utilities: The City of Alpena has verified with 1) Alpena Power Company that power has been shut off and Alpena Power facilities removed; 2) Veolia that water has been shut off, and 3) DTE that gas lines have been cut and capped at the main. Contractor is required to properly cap the sewer line and cut and cap the water line; the water utility will ensure water shutoff at the street. Contractor is responsible for contacting Miss Dig prior to any demolition activity.

2.1.3.1 The contractor is responsible for providing water for dust suppression, if needed. Arrangements may be made with Veolia to utilize a nearby hydrant for water; water usage fees must be included in RFP submissions.

2.1.3.2 Contractor should arrange for alternate sources of power to operate needed equipment. Contractor has responsibility for confirming the disconnection of utilities prior to the start of site activities.

2.1.3.3 There are no restroom facilities at the project site. The contractor is responsible for providing access to restroom facilities for its workers.

2.1.4 Asbestos Containing Materials and Universal Waste: All asbestos/hazardous material and universal waste have been removed from the building and a passed clearance exam has been received from the environmental contractor. The ACM/Haz report is included in the Environmental Construction Management Plan from Otwell Mawby.

2.1.5 Soil Erosion: Contractor shall comply with the Natural Resources and Environmental Protection Act; Soil Erosion and Sediment Control, 1994 PA 451 Part 91 as amended.

2.1.5.1 Includes all application fees and obtaining a soil erosion and sedimentation control permit from Alpena County. Appendix C should be used as the site plan to pull the SESC permit.

2.1.5.2 Includes furnishing, installing, and maintaining as long as necessary and remove when no longer required, all necessary engineering controls to prevent erosion and control sedimentation of onsite soils.

2.1.6 Demolition: Includes all labor, equipment, materials, fees, permits, and incidentals needed to: demolish building, flatwork, and below grade structures associated with the building (including basement, foundations, footings, sumps, pits, vaults, etc.); transportation and disposal of all demolition debris; removal of concrete areas on site as specified below, private sidewalks; and utility disconnects, removal, abandonment or protection of buried underground utilities as specified.

2.1.6.1 Huron Engineering developed the demolition site plans which are included in this RFP as Appendix C; questions about the site plan should be directed to Becky Rivard at 989-356-6375.

2.1.6.2 A Demo Phase Environmental Construction Management and Due Care Plan has been created by Otwell Mawby due to previous fill materials brought on site, as well as an underground storage tank that was present at the site but was reported as removed. Moving of materials in these areas should be limited and should not be taken off site to other properties. Questions about the plan should be directed to James Jackson at 231-946-5200.

2.1.6.3 The cost to remove trees that are necessary to remove in order to facilitate demolition, or additional debris, should be included in the bid.

2.1.6.4 Use of explosives is strictly prohibited. Do not burn demolished materials.

2.1.6.5 Except for items or materials indicated to be reused, salvaged, or otherwise indicated to remain property of the ACLBA or property owner, demolished materials shall become the contractor's property and shall be removed, recycled, or disposed from the project site in an appropriate and legal manner in a State licensed location or landfill.

2.1.6.6 Contractor will be required to provide water, application equipment, and personnel for dust suppression during demolition activities.

2.1.6.7 Contractor shall put in place any necessary protections to protect adjacent properties, employees, and equipment.

2.1.6.8 Contractor shall be responsible for actions necessary to remedy situations involving material spilled or leaked in transit, or mud or dirt tracked off the site. This includes trucks carrying imported fill or other materials to the site (i.e. dust generated from trucks entering the site on adjacent roads). Perform cleanup in accordance with all applicable federal, State, and local regulations at no additional cost to the ACLBA.

2.1.6.9 Temporary Fencing: The successful Respondent(s) must entirely enclose the demolition activity area by means of woven wire or snow fence having minimum height of four feet if an open hole is left overnight. Gates must be provided at all points of access, as applicable. Gates must be closed and secured in place at all times when work is not in progress. The fence must be removed and grounds restored to original condition upon completion of the work.

2.1.6.10 Contractor shall comply with all applicable MIOSHA standards.

2.1.7 Site Restoration: The site is currently being planned for future development; however, the timeline is to-be-determined. The site should be graded in a manner that utilizes and levels existing soils; the intent is not to fill the site with backfill material which will be required to be removed later. The site shall be restored with topsoil and seeded with grass to prevent soil erosion. Questions on proper restoration should be directed to Huron Engineering; see Appendix C. Procedures, methods, materials, and other information regarding excavation and backfill shall be included in the Project Work Plan developed by the contractor. The following information regarding excavation and backfilling shall be included in the Project Work Plan, at a minimum: (1.) Project Schedule; (2.) List of Subcontractors; (3.) Description of the methods to be used for each related operation (i.e., excavation, transportation, sampling, etc.); (4.) Method to protect any storm sewers, rivers, and conveyances during soil excavation in close proximity of the site; and (5.) Description of the means, methods, and procedures for site restoration.

2.1.7.1 Backfill Material: It is not intended that backfill material will be used at this site, other than soil for grass seeding. If used, fill material shall be clean and uncontaminated from natural soils; no material bigger than 3 inches (unless naturally occurring) is allowed. Material shall be MDOT Class II sand or MDOT Class III granular fill and shall be free of trash, debris, roots, other organic matter, and contaminants. Contractor shall confirm origin site of fill material and the SLBA may choose to require a material test. Fill material shall not be taken from another project site and relocated to projects within the scope of this RFP.

2.1.7.2 Finished Grade: Two to six inches of topsoil shall be used to reach final grade and the property shall be seeded with perennial grass seed, and mulched. See site plan from Huron Engineering for details.

2.1.7.3 Right-of-way Areas: Contractor is required to repair, in kind or better, any areas of the contractor's access point, such as public roads, sidewalks, or curbs, disturbed as a result of contractor's work at the site.

2.1.8 Demobilization: Includes all labor, equipment, materials, and incidentals to complete balance of the work under the bidding documents including but not limited to: site demobilization including removing personnel, equipment, supplies, rubbish and incidentals from the project site.

2.1.9 Time of Work and Completion: The work to be completed pursuant to this Request for Proposal will be scheduled between the hours of 7:00 a.m. and 6:00 p.m., Monday through Saturday. No work shall be done between the hours of 6:00 p.m. and 7:00 a.m.

2.1.9.1 Contractor shall begin on-site demolition activities within thirty (30) days of receiving a notice to proceed, unless weather conditions are such that demolition cannot take place or coordination amongst all parties causes a delay; in such case, a new timeline will be agreed upon via a contract addendum. Demolition activities must be complete no later than June 1, 2026. The contractor shall not discontinue work for more than five (5) consecutive calendar days without the prior written approval of the ACLBA.

2.1.10 The ACLBA has the right to prioritize project locations.

2.1.11 The City of Alpena and the ACLBA may choose to partner with the Alpena City Fire Department to conduct fire related training activities at the subject property after abatement and before demo; the City of Alpena will coordinate activity timelines with the contractor.

2.1.12 Irregularities or Changes in Scope of Work: The contractor shall notify the ACLBA immediately of any irregularities or changes in the scope of the work.

DELIVERABLES AND INSPECTIONS

3.1 Documents: The contractor must submit the following documentation to the ACLBA following the noted milestones. Prior to processing of final payment, all documents must be delivered to the ACLBA.

3.2 Inspections: Required inspections must take place; failure to coordinate a required inspection may result in rework or nonpayment.

3.3 Prior to Work Beginning

- 3.3.1 Project Schedule
- 3.3.2 Pre-work photos of site
- 3.3.3 Project Work Plan
- 3.3.4 Health & Safety Plan
- 3.3.5 Proposed disposal facilities and facility licenses
- 3.3.6 Copy of Performance Bond

3.4 Prior to Demolition

- 3.4.1 Copies of NESHAP notification for demolition
- 3.4.2 Demo permit application and permit
- 3.4.3 Dust control and air monitoring plan
- 3.4.4 Soil erosion and sedimentation control plan and permit
- 3.4.5 Utility disconnects applications and verifications as applicable

3.5 During Demolition

- 3.5.1 Coordination with ACLBA representative for open hole inspection and photo
- 3.5.2 Coordination with ACLBA representative for inspection and photo of sewer line cap and water line cut and cap
- 3.5.3 Coordination with ACLBA representative for final inspection

3.6 After Demolition

- 3.6.1 Copies of all demolition waste manifests, if applicable and copies of all landfill tickets proving proper disposal
- 3.6.2 Photos of finished site
- 3.6.3 Completed Lien Waver form

TERMS AND CONDITIONS

4.1 The Request for Proposal is not an offer of contract. Receipt of a proposal neither commits the ACLBA to award a contract to any vendor, even if all requirements stated in this proposal are met, nor limits the ACLBA's right to negotiate in its best interest.

4.2 Expenses incurred in the preparation of proposals in response to this Request for Proposal are the bidder's responsibility.

4.3 The ACLBA reserves the right to contract with a vendor for reasons other than lowest price. Evaluation of bids may include factors such as price, qualifications, experience, and scheduling.

4.4 The ACLBA reserves the right to contract with more than one contractor and may contract by project address.

4.5 No work performed by the contractor that is out of the scope of this RFP and/or as defined by the vendor's proposal will be reimbursed unless specifically authorized by the ACLBA in writing.

4.6 The contractor, subcontractors, and their employees shall be considered independent contractors and shall not be deemed employees of the ACLBA for any reason.

4.7 All proposals are subject to the Michigan Freedom of Information Act. Once bids are opened, the information contained therein becomes freely accessible by the public.

4.8 All required documentation shall be received prior to payment to the contractor. Contractor shall submit an invoice to the City of Alpena. Payment is anticipated to be NET 30 subsequent to receipt of contractor invoice and all required supporting documentation.

4.9 See Appendix A for insurance requirements. Subcontractors will be required to maintain the same level of insurance.

4.10 The project referred to in this RFP is associated with a grant through the State Land Bank with Federal funds. Required Federal and State provisions are outlined in Appendix A and must be adhered to. Provisions not adhered to will jeopardize grant reimbursement and the contractor will be held liable for any expenses incurred that are not reimbursed due to contractor negligence.

PROPOSAL REQUIREMENTS

5.1 Any misunderstanding of the project scope or level of effort required to complete the requested scope of work that comes from a contractor not fully reviewing this RFP will not release the contractor from any responsibility outlined within this RFP.

5.2 The following shall be included with the contents of the proposal:

5.2.1 The completed Bid Form and documents identified on the Bid Form for submission.
5.2.2 Identification of any subcontractors retained for the project
5.2.3 A copy of all applicable licenses
  5.2.3.1 HAZWOPER Training: Evidence of HAZWOPER (Hazardous Waste Operation and Emergency Response) training with proof that the course was taken and is current; subcontractor shall be able to demonstrate past experience handling contaminated material.
  5.2.3.2 Demolition Licenses and/or Experience: For commercial properties, a State of Michigan Builders license is not required; however, if you have a license, please submit it; submit proof of documented experience completing residential and/or commercial demolitions, including successful coordination across agencies.
5.2.4 Proof of insurance or a letter from the contractor's insurance company indicating insurance can be obtained in accordance with the specific terms identified in Appendix B.

5.3 A pre-bid meeting with the City of Alpena and Huron Engineering will be held on October 24, 2025 at 3 PM. Contractor can visit the site and view the property from the public right-of-way at their convenience at any time.
5.4 Questions regarding this Request for Proposal shall be submitted by email by 5:00 PM on November 4, 2025, and directed to Montiel Birmingham at montielb@alpena.mi.us or 989-354-1771.
5.5 Sealed bids shall be submitted by mail or in person with the following subject: "Bid for 1315 W Chisholm St Demolition Services – ACLBA." To be considered, bids must be received by 4:00 PM on November 5, 2025. Bids will be accepted by Montiel Birmingham at 208 N First Ave, Alpena MI 49707 or by Cindy Cebula at 720 W Chisholm St. Suite 3, Alpena MI 49707. Bids received after the deadline will not be accepted.
5.6 Sealed bids will be opened publicly in the Howard Male Conference Room of the Alpena County Annex Building, 719 W Chisholm St., Alpena, Michigan, by the Alpena County Land Bank Authority on November 6th, 2025 at 9:00 AM. Contractors are welcome to attend.
5.7 The ACLBA will review the bids received. A contractor will be selected in the Howard Male Conference Room of the Alpena County Annex Building, 719 W Chisholm St., Alpena, Michigan, by the Alpena County Land Bank Authority on November 7th, 2025 at 3:00 PM. Contractors are welcome to attend. A response will be emailed out to all responding bidders post-bid review.
5.8 Bids submitted may not be withdrawn or modified for 60 days following the date on which they are reviewed publicly by the ACLBA unless requested by the ACLBA or its representative. The ACLBA reserves the right to delete or amend the contract and to add projects upon negotiation with the Contractor.

APPENDIX A - FEDERAL REQUIREMENTS

The projects referred to in this RFP are associated with a grant through the State Land Bank with Federal funds. Required Federal and State provisions are outlined below and must be adhered to. Provisions not adhered to will jeopardize grant reimbursement and the contractor will be held liable for any expenses incurred that are not reimbursed due to contractor negligence.

A. RECORDKEEPING REQUIREMENTS. Generally, all contractors and subcontractors must maintain records and financial documents related to this contract until at least December 31, 2031. U.S. Treasury may request the transfer of records of long-term value at the end of such period. Wherever practicable, such records should be collected, transmitted, and stored in open and machine-readable formats. See generally, 2 CFR 200.334 through 200.338.

All contractors and subcontractors must agree to provide or make available such records to Treasury upon request, and to the Government Accountability Office (GAO), Treasury's Office of Inspector General (OIG), and their authorized representative in order to conduct audits or other investigations.

B. UNIFORM GUIDANCE. Under the Final Rule issued by the U.S. Department of the Treasury (Treasury) referenced at https://home.treasury.gov/system/files/136/SLFRF-Final-Rule-FAQ.pdf, this contract is subject to the requirements set forth in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, (the "Uniform Guidance") at 2 CFR 200.317 through 200.327. All payments requested under this program should be accounted for with supporting documentation. All contractors and subcontractors should maintain documentation evidencing that the Program Funds were expended in accordance with federal, state, and local regulations.

C. TERMINATION/RECOVERY OF PROGRAM FUNDS. Treasury requires any Program Funds received pursuant to this Agreement, and any attachments that are expended in a manner that fails to comply with SLFRF and all other applicable laws to be returned to Treasury. The State reserves the right to monitor the Subrecipient and their contractors and subcontractors and take such corrective action for noncompliance as it deems necessary and appropriate, including but not limited to, termination of the Grant Agreement and return of Program Funds previously provided thereunder.

D. TERMINATION. The parties' contract will include the following provision: Either Party may terminate obligations under this Agreement by giving the other Party thirty (30) calendar days prior written notice of such termination. The ACLBA may immediately terminate this Agreement upon written notice to Contractor if Contractor materially breaches its obligations under this Agreement or engages in any conduct which the ACLBA, in its sole discretion, determines has or could have an adverse impact on the ACLBA's reputation or interests. In addition, the ACLBA may immediately terminate this agreement upon written notice to Contractor, without further liability to the ACLBA, if Contractor, an officer of Contractor, or an owner of a 25% or greater share of Contractor is convicted of a criminal offense relating to a State, public, or private contract or subcontract; or convicted of a criminal offense including, but not limited to, any of the following: embezzlement, theft, forgery, bribery, falsification or destruction of records, receiving stolen property, attempting to influence a public employee to breach the ethical conduct standards for State employees; convicted under state or federal antitrust statutes, or convicted of any other criminal offense which, in the sole discretion of the ACLBA, reflects on Contractor's business integrity.

E. EQUAL EMPLOYMENT OPPORTUNITY. Except as otherwise provided under 41 CFR Part 60, all contracts that meet the definition of "federally assisted construction contract" in 41 CFR Part 60–1.3 must include the equal opportunity clause provided under 41 CFR Part 60–1.4(b), in accordance with Executive Order 11246, "Equal Employment Opportunity" (30 FR 12319, 12935, 3 CFR Part 1964–1965 Comp., p. 339), as amended by Executive Order 11375, "Amending Executive Order 11246 Relating to Equal Employment Opportunity," and implementing regulations at 41 CFR Part 60, "Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor."

F. COPELAND "ANTI–KICKBACK" ACT (40 U.S.C. 3145), as supplemented by Department of Labor regulations (29 CFR Part 3, "Contractors and Subcontractors on Public Building or Public Work Financed in Whole or in Part by Loans or Grants from the United States"). The Act provides that each contractor or Subrecipient must be prohibited from inducing, by any means, any person employed in the construction, completion, or repair of public work, to give up any part of the compensation to which he or she is otherwise entitled. The non–Federal entity must report all suspected or reported violations to the Federal awarding agency.

G. DEBARMENT AND SUSPENSION (Executive Orders 12549 and 12689). A contract or grant award (see 2 CFR 180.220) must not be made to parties listed on the governmentwide exclusions in the System for Award Management (SAM), in accordance with the OMB guidelines at 2 CFR 180 that implement Executive Orders 12549 (3 CFR Part 1986 Comp., p. 189) and 12689 (3 CFR Part 1989 Comp., p. 235), "Debarment and Suspension." SAM Exclusions contains the names of parties debarred, suspended, or otherwise excluded by agencies, as well as parties declared ineligible under statutory or regulatory authority other than Executive Order 12549. All contractors and subcontractors must be vetted for debarment. If debarment action has been taken against the contractor, the contract shall be terminated. If debarment action has been taken against any subcontractor, the contractor shall provide an alternative subcontractor within 10 days of notification. The debarred subcontractor may not work on the project.

H. CONFLICT OF INTEREST (2 CFR 200.318 and 24 CFR 570.611)

The general rule is that no persons who exercise or have exercised any functions or responsibilities with respect to activities assisted, or who are in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from an assisted activity, or have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity, or with respect to the proceeds of the assisted activity, either for themselves or those with whom they have business or immediate family ties, during their tenure or for one year thereafter.

I. CONTRACT WORK HOURS AND SAFETY STANDARDS ACT (40 U.S.C. 3701–3708). Where applicable, all contracts awarded in excess of $100,000 that involve the employment of mechanics or laborers must include a provision for compliance with 40 U.S.C. 3702 and 3704, as supplemented by Department of Labor regulations (29 CFR Part 5). Under 40 U.S.C. 3702 of the Contract Work Hours and Safety Standards Act, each contractor must be required to compute the wages of every mechanic and laborer on the basis of a standard work week of 40 hours. Work in excess of the standard work week is permissible provided that the worker is compensated at a rate of not less than one and a half times the basic rate of pay for all hours worked in excess of 40 hours in the work week. The requirements of 40 U.S.C. 3704 are applicable to construction work and provide that no laborer or mechanic must be required to work in surroundings or under working conditions which are unsanitary, hazardous, or dangerous. These requirements do not apply to the purchases of supplies or materials or articles ordinarily available on the open market, or contracts for transportation or transmission of intelligence.

J. BYRD ANTI–LOBBYING AMENDMENT (31 U.S.C. 1352). Contractors that apply or bid for an award exceeding $100,000 must file the required certification. Each tier certifies to the tier above that it will not and has not used Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal contract, grant or any other award covered by 31 U.S.C. 1352. Each tier must also disclose any lobbying with non–Federal funds that takes place in connection with obtaining any Federal award. Such disclosures are forwarded from tier to tier up to the non–Federal award.

M. CLEAN AIR ACT (42 U.S.C. 7401–7671q) and the Federal Water Pollution Control Act (33 U.S.C. 1251–1387) as amended. Contracts, grant agreements, and subgrants of amounts in excess of $150,000 must agree to comply with all applicable standards, orders or regulations issued pursuant to the Clean Air Act (42 U.S.C. 7401–7671q) and the Federal Water Pollution Control Act, as amended (33 U.S.C. 1251–1387). Violations must be reported to the Federal awarding agency and the Regional Office of the Environmental Protection Agency (EPA).

APPENDIX B - INSURANCE REQUIREMENTS

The contractor, and any and all of their subcontractors, shall not commence work under this contract until they have obtained the insurance required under this attachment. All coverage shall be with insurance companies licensed and admitted to do business in the State of Michigan.

Workers Compensation Insurance:

a. Contractor shall maintain statutory workers compensation and employer's liability insurance. Limits shall be no less than $500,000 for bodily injury by accident or $500,000 each employee for bodily injury by disease. Depending on the type of project the minimum coverage may be increased.
b. Waiver of Subrogation - Contractor waives all rights against the ACLBA, the City of Alpena, their agents, public officials, employees, and volunteers for recovery of damages to the extent these damages are covered by workers compensation and employer's liability insurance obtained by the Contractor.
c. If Contractor is self-insured for purposes of workers compensation, the Contractor must submit a copy of a current letter, permit, or certification issued by the appropriate state agency.

Commercial General Liability and Umbrella/Excess Liability Insurance:

a. Contractor shall maintain commercial general liability (CGL), and, if necessary, commercial umbrella/excess insurance with a limit of not less than $1,000,000 each occurrence/$2,000,000 aggregate. If the CGL insurance contains a general aggregate limit, such limit shall apply separately to this project.
b. CGL insurance shall cover liability arising from premises, operations, independent contractors, products-completed operations, personal injury and advertising injury, and liability assumed under an insured contract, including this contract.
c. The ACLBA and the City of Alpena shall be included as an additional insured under the CGL and under the commercial umbrella/excess, if any. This insurance shall apply as primary insurance with respect to any other insurance or self-insurance program afforded to the ACLBA and City of Alpena. A copy of the certificate shall be provided to the City of Alpena prior to the execution of the contract. On the Additional Remarks Schedule of the certificate, it shall state: "The Alpena County Land Bank Authority and the City of Alpena is an Additional Insured on the noted policies with respect to any contract between the Named Insured and the Certificate Holder."
d. Waiver of subrogation - Contractor waives all rights against the ACLBA, the City of Alpena, and their agents, public officials, employees, and volunteers to the extent these damages are covered by the CGL or commercial umbrella liability maintained pursuant to this agreement.

Business Auto and Umbrella/Excess Liability Insurance:

a. Contractor shall maintain business auto liability and, if necessary, commercial umbrella/excess liability insurance with a limit of not less than $1,000,000 each accident. Such insurance shall cover liability arising out of any auto, including owned, non-owned, and hired.
b. Waiver of subrogation – Contractor waives all rights against the ACLBA, the City of Alpena, and their agents, public officials, employees, and volunteers for recovery of damages to the extent these damages are covered by the business auto liability or commercial umbrella insurance obtained pursuant to this agreement.

Professional Liability Insurance (as applicable):

a. Abatement Contractors shall maintain professional (Errors & Omissions) coverage with a limit of not less than $1,000,000 per loss.
b. Such insurance shall cover damages arising out of a Wrongful Act including any error, omission, or negligent act committed in the performance of professional services for the ACLBA or the City of Alpena.
c. If Professional Liability Insurance is written on a claims-made basis, the Contractor warrants that any retroactive date applicable to coverage under the policy precedes the effective date of this contract; and that continuous

coverage will be maintained, or an extended discovery period (EDP) will be exercised for a period of 3 years beginning from the time that work under this Contract is completed. Contractor shall bear the expense of purchasing the EDP, if applicable.

d. A copy of the certificate shall be provided to the City of Alpena prior to the execution of the contract. On the Additional Remarks Schedule of the certificate, it shall state: "The Alpena County Land Bank Authority and the City of Alpena are Additional Insured on the noted policies with respect to any contract between the Named Insured and the Certificate Holder."

Insurance Company Approval and Certificates of Insurance:

Insurance Companies, additional insured endorsements, and policy forms shall be subject to the approval of the Alpena County Land Bank Authority. Such approval shall not be unreasonably withheld. Contractor shall furnish the County Treasurer with certificates of insurance or a certified copy of the policy if requested by County Treasurer.

HOLD HARMLESS CLAUSE

The Contractor shall defend, pay on behalf of, and hold harmless the ACLBA, their employees, agents, public officials, and volunteers from and against any and all losses, damages, expenses, claims, suits, and demand of whatever nature resulting from damages or injuries, including death, to any persons or property, and including any claim for losses incurred by reason of project delay, impact (soft) costs, or other intangible losses that might result from Contractor's late or defective performance, caused by or arising out of any action, omission, or operation performed in connection with work attributable to this contract; provided, however, the Contractor shall not be required to indemnify the ACLBA, their employees, agents, public officials, and volunteers for any damages or injuries, including death, to any person or property caused solely and exclusively by the negligence of the ACLBA or their employees, public officials, and volunteers.

BID FORM

Bid Form – Page 1

Bidding Company _____

Address City/State/Zip _____

Full Name(s) of principal owners _____

Authorized Representative & Title _____

Phone and Email _____

Signature _____

Date _____

SERVICE CATEGORY: □ Demolition

Cost to Complete the requirements and scope of work outlined in the RFP. Additional pages may be added as necessary.

DEMOLITION: 1315 W Chisholm St, Alpena MI 49707

Demolition and Site Restoration	Flat Rate	$

Length of time to complete job (in working days) _____

Earliest Start Date _____

List any subcontractors and the tasks for which they will be used

How is your company organized (corporation, partnership, etc.) and how long have you been in business?

Bid Form – Page 2

Give a brief summary of the history of the business.

Provide the name and work experience of the person assigned to perform the duties outlined in this RFP. This person will be the main contact for the ACLBA, unless someone else is specified.

List any professional licenses/certifications of the company or employees assigned to this contract as applicable to this project.

Has your company received any violations in the last three (3) years? If yes, please list and explain how the violations were resolved.

How are claims handled, such as property damage caused by your operation?

Bid Form – Page 3

Please provide the names, phone numbers, and email addresses of at least three customers for whom you have completed Demolition services within the last five years. If possible, these customers should be governmental or public entities. Note if the activity was residential or commercial in nature. Attach additional pages if needed.

Activity	Entity	Name	Phone

CERTIFICATIONS-Authorized Signatory to initial each of the following, as applicable:

_____ Respondent certifies that it is not an Iran-linked business as defined in MCL 129.312 of the Iran Economic Sanctions Act, Michigan PA 517 of 2012.

_____ Respondent certifies that all taxes are paid to federal, state, and local jurisdictions as of this date.

_____ Respondent certifies that it owes no outstanding debt to the State of Michigan or Alpena County.

_____ Respondent certifies that: (check one)

_____ To the best of its knowledge, there exists no actual or potential conflict of interest between Respondent, Respondent's project manager(s) or its family's business or financial interests ("Interests") and the service provided under a potential Contract.

_____ That there is an actual or potential conflict which is explained in the submittal.

_____ Respondent certifies that they have completed a thorough review of the RFP documents, which include the Scope of Work, Deliverables and Inspections, Terms & Conditions, Proposal Requirements, State and Federal Requirements, and Insurance requirements.

_____ Respondent certifies that they understand the projects included are part of a grant program and failure to abide by the Request for Proposal may jeopardize grant reimbursement and the contractor will be held liable for any expenses incurred that are not reimbursed due to contractor negligence.

DOCUMENTS TO INCLUDE WITH SUBMISSION:

_____ Completed Bid Form, including all Certifications acknowledged

_____ Confirmation of up-to-date HAZWOPER Training

_____ Proof of Insurance or proof of insurability from insurance agent

_____ Copies of notable licenses or trainings

_____ Completed Non-Iran Business Certification

_____ Copy of Byrd Anti-Lobbying form (if applicable)

_____ Date:_____

Signature of Authorized Signatory

NON-IRAN BUSINESS CERTIFICATION

9.1 Pursuant to Michigan law (Iran Economic Sanctions Act, Michigan PA 517 of 2012), before accepting any bid or proposal or entering any contract for goods and services with any prospective vendor, the County must obtain certification from the vendor that it is not an "Iran-Linked Business."

9.2 By signing below, I certify and agree on behalf of the company submitting this form and myself the following: (1) that I am duly authorized to legally bind the company submitting this proposal; (2) that the company submitting this proposal is not an "IranLinked Business," as that term is defined in Section 2(E) of the Iran Economic Sanctions Act, Michigan PA 517 of 2012; and (3) that I and the company submitting this proposal will immediately comply with any further certifications or information submissions requested by the county in this regard.

Company Name _____

Authorized Representative _____
(printed name and title)

Signature _____ Date _____

BYRD ANTI-LOBBYING AMENDMENT CERTIFICATION

Contractors who apply or bid for an award of $100,000 or more shall file the required certification. Each tier certifies to the tier above that it will not and has not used Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, officer or employee of Congress, or an employee of a Member of Congress in connection with obtaining any Federal contract, grant, or any other award covered by 31 U.S.C. § 1352. Each tier shall also disclose any lobbying with non-Federal funds that takes place in connection with obtaining any Federal award. Such disclosures are forwarded from tier to tier up to the recipient who in turn will forward the certification(s) to the awarding agency.

APPENDIX A, 44 C.F.R. PART 18 – CERTIFICATION REGARDING LOBBYING – REQUIRED FOR CONTRACTS OVER $100,000

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

3. The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

The Contractor,_____, certifies or affirms the truthfulness and accuracy of each statement of its certification and disclosure, if any. In addition, the Contractor understands and agrees that the provisions of 31 U.S.C. Chap. 38, Administrative Remedies for False Claims and Statements, apply to this certification and disclosure, if any.

Company Name _____

Authorized Representative _____
(printed name and title)

Signature _____ Date _____

APPENDIX C – HURON ENGINEERING APPROVED DEMO SITE PLAN

BUILDING DEMOLITION LOCATION MAP	DATE 07/22/2025 DRN KAS CHD RER	HURON ENGINEERING & SURVEYING, INC.
CLIENT: CITY OF ALPENA	SCALE NA	PAGE NO 1

BUILDING DEMOLITION
LOCATION MAP

DATE
07/22/2025

DRN
KAS

CHD
RER

HURON
ENGINEERING & SURVEYING, INC.

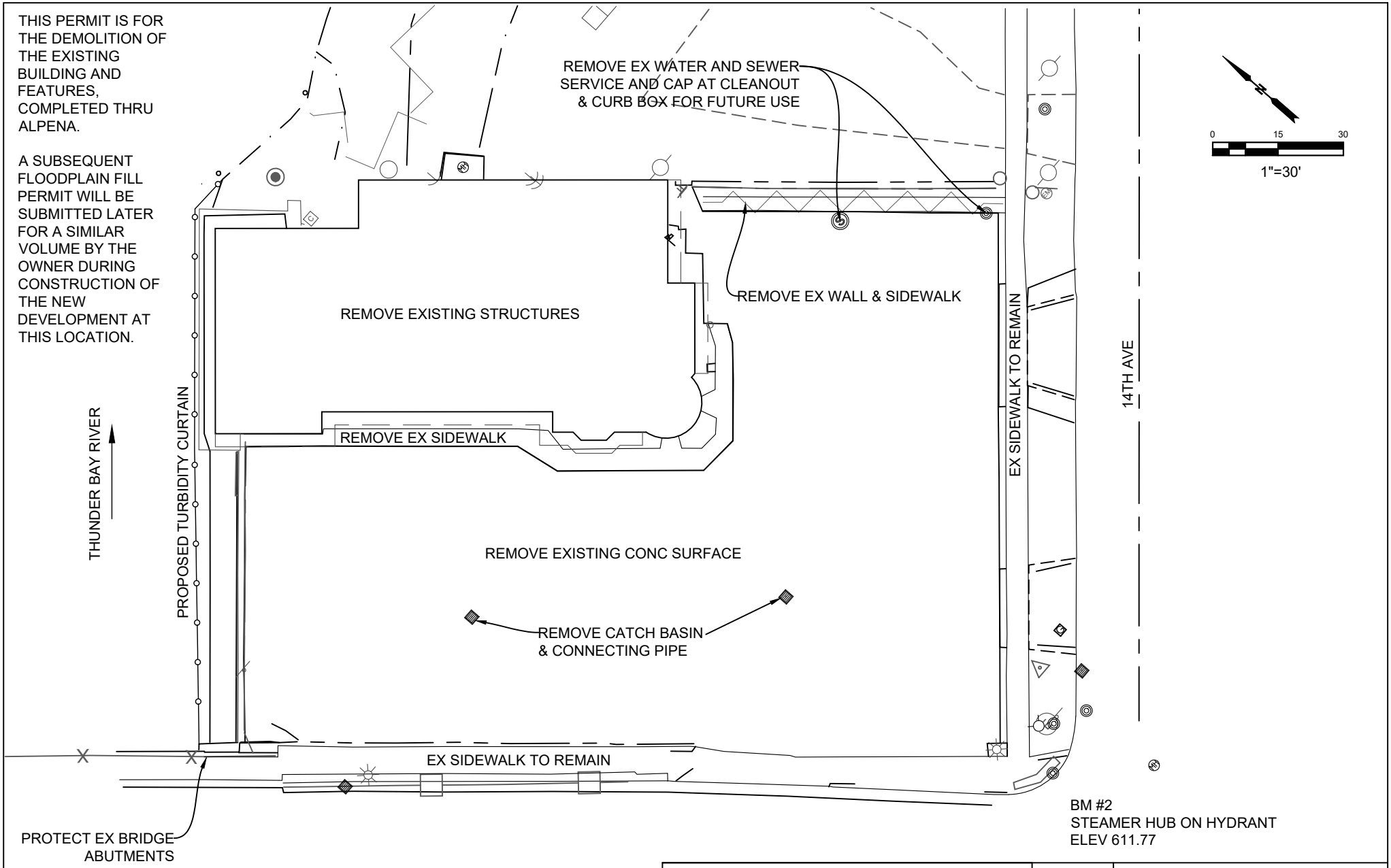
CLIENT:
CITY OF ALPENA

SCALE
NA

PAGE NO
2

THIS PERMIT IS FOR THE DEMOLITION OF THE EXISTING BUILDING AND FEATURES, COMPLETED THRU ALPENA.

A SUBSEQUENT FLOODPLAIN FILL PERMIT WILL BE SUBMITTED LATER FOR A SIMILAR VOLUME BY THE OWNER DURING CONSTRUCTION OF THE NEW DEVELOPMENT AT THIS LOCATION.



BM #1
BRASS DISC IN BRIDGE
ELEV 605.17

BM #2
STEAMER HUB ON HYDRANT
ELEV 611.77

BUILDING DEMOLITION
PLAN VIEW

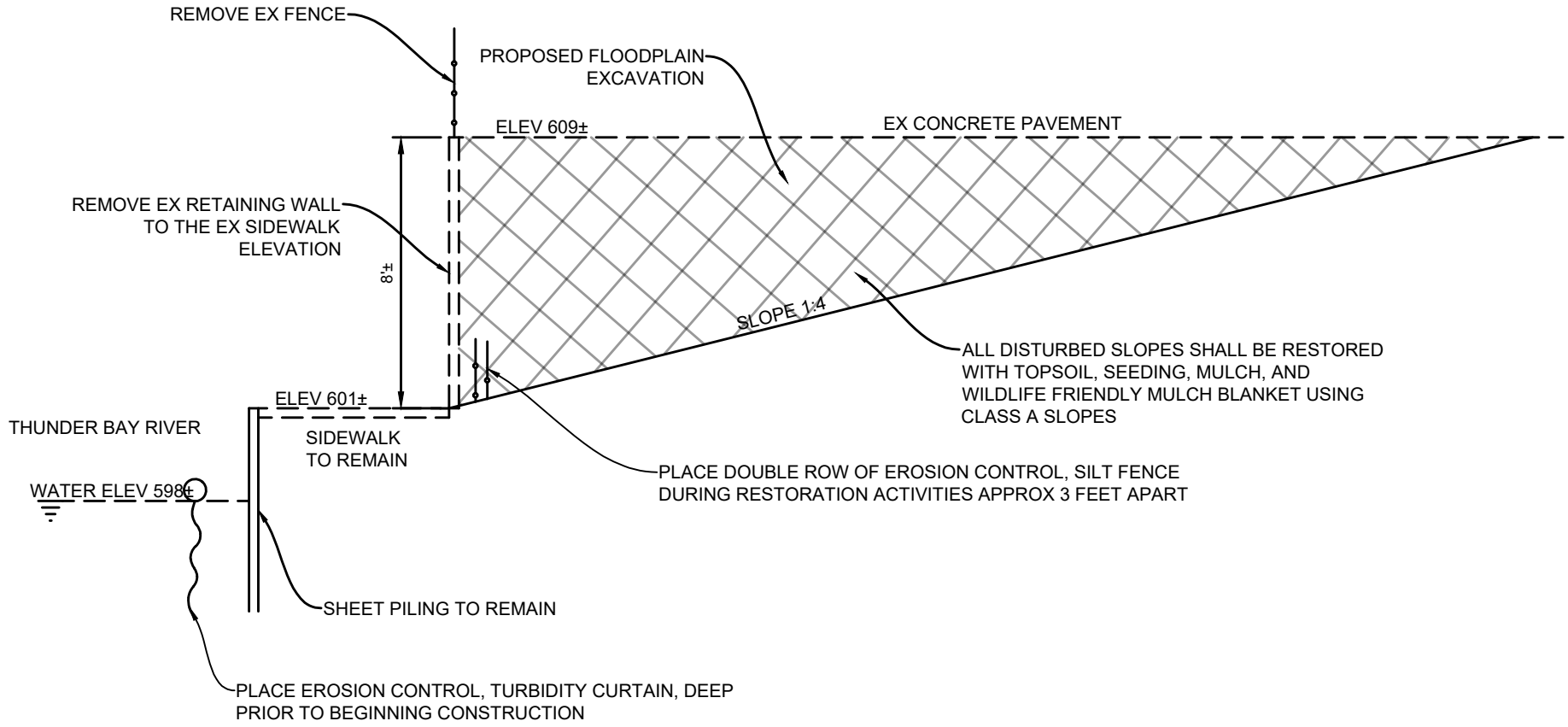
DATE	07/22/2025
DRN	KAS
CHD	RER
SCALE	NA

HURON
ENGINEERING & SURVEYING, INC.

CLIENT:
CITY OF ALPENA

EXCEPT WHERE OTHERWISE INDICATED ON THESE PLANS OR IN THE PROPOSAL AND SUPPLEMENTAL SPECIFICATIONS CONTAINED HEREIN, ALL MATERIALS AND WORKMANSHIP SHALL BE IN ACCORDANCE WITH THE MICHIGAN DEPARTMENT OF TRANSPORTATION 2020 STANDARD SPECIFICATIONS FOR CONSTRUCTION.

FOR PROTECTION OF UNDERGROUND UTILITIES AND IN CONFORMATION WITH PUBLIC ACT 174, 2013, THE CONTRACTOR SHALL DIAL 811 A MINIMUM OF THREE FULL WORKING DAYS, EXCLUDING SATURDAYS, SUNDAYS, AND HOLIDAYS PRIOR TO BEGINNING EACH EXCAVATION IN AREAS WHERE PUBLIC UTILITIES HAVE NOT BEEN PREVIOUSLY LOCATED. MEMBERS WILL THUS BE ROUTINELY NOTIFIED. THIS DOES NOT RELIEVE THE CONTRACTOR OF THE RESPONSIBILITY OF NOTIFYING UTILITY OWNERS WHO MAY NOT BE A PART OF THE "MISS DIG" ALERT SYSTEM.



BUILDING DEMOLITION CROSS SECTION	DATE 07/22/2025	HURON ENGINEERING & SURVEYING, INC.
	DRN KAS	
	CHD RER	
CLIENT: CITY OF ALPENA	SCALE NA	PAGE NO 4

APPENDIX D – ENVIRONMENTAL CONSTRUCTION MANAGEMENT AND DUE CARE PLAN

Former Alpena Big Boy Property
Parcel Identification Number: 093-637-000-955-00
1315 West Chisholm Street
City of Alpena, Alpena County, Michigan

SITE AND BUILDING DEMOLITION PHASE ENVIRONMENTAL CONSTRUCTION MANAGEMENT AND DUE CARE PLAN

Conducted Pursuant to Section 20126(1)(c)
Of 1994 Public Act 451, Part 201, as amended,
and the Rules promulgated thereunder

June 2025

Prepared for:

The Alpena County Land Bank Authority
C/o: Montiel Birmingham
720 West Chisholm Street
Alpena, MI 49707

Prepared by:

Otwell Mawby, P.C.
Consulting Engineers
309 East Front Street
Traverse City, MI 49684

Otwell Mawby Project No.: 24-102E

Environmental ▪Brownfield ▪Asbestos

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SITE AND BUILDING DEMOLITION PHASE
ENVIRONMENTAL CONSTRUCTION MANAGEMENT AND DUE CARE PLAN

Former Alpena Big Boy Property
Parcel Identification Number: 093-637-000-955-00
1315 West Chisholm Street
City of Alpena, Alpena County, Michigan

1.0 INTRODUCTION AND PURPOSE

Otwell Mawby, P.C. (Otwell Mawby) has prepared this Environmental Construction Management and Due Care Plan (ECM/ DCP) at the request of the Alpena County Land Bank Authority in preparation for redevelopment of the commercial parcel that encompasses 0.52-acres, located at 1315 West Chisholm Street in the City of Alpena, Alpena County, Michigan (hereafter referred to as the subject property). According to tax assessment records obtained from the Alpena County Equalization Department and the City of Alpena Assessors Office, the subject property has been assigned Parcel Identification Number: 093-637-000-955-00, which is owned by Sunset Aurora, LLC. The general location of the subject property is shown on the attached Figure 1, Site Location Map. The attached Figure 2 depicts the approximate boundary of the subject property.

The purpose of this document is to supplement the Health and Safety Plan (HASP) prepared for the subject property by the selected site demolition contractor (hereafter referenced to as the Contractor) that is to be retained by the Alpena County Land Bank Authority. This document is intended to provide general environmental management strategies for the demolition phase of the project to prevent exacerbation of potential encountered impacts, provide protection protocols to site workers, and details management strategies associated with potentially impacted media (soil, groundwater, soil gas, and/ or surface water) that may be encountered. This document also provides details for management and personal protection protocols associated with asbestos containing materials (ACMs), cadmium and lead containing paints and universal wastes that have been identified onsite. As noted below, known ACMs and universal wastes have been removed from the building.

As discussed in detail in Section 1.3, prior environmental investigations have identified the presence of impacted soil and groundwater, and potentially impacted soil gas, on the subject property. This ECM/ DCP has been completed in accordance with Section 20107a of Part 201 of Act 451 (the Natural Resources and Environmental Protection Act (NREPA)), of 1994, as amended, including the Part 9 Rules as the subject property has been determined to meet the definition of a "Facility", as noted below. The regulation imposes "Due Care Obligations" on owners and operators of contaminated properties. These obligations are detailed as follows.

1. Undertake measures as are necessary to prevent exacerbation;
2. Exercise due care by undertaking response activity necessary to mitigate unacceptable exposure to hazardous substances, mitigate fire and explosion hazards due to hazardous substances, and allow for the intended use of the facility in a manner that protects the public health and safety;
3. Take reasonable precautions against the reasonably foreseeable acts or omissions of a third party and the consequences that foreseeably could result from those acts or omissions;
4. Provide reasonable cooperation, assistance, and access to the persons that are authorized to conduct response activities at the facility, including the cooperation and access necessary for the installation, integrity, operation, and maintenance of any complete or partial response activity at the facility. Nothing in this subdivision shall be interpreted to provide any right of access not

expressly authorized by law, including access authorized pursuant to a warrant or a court order, or to preclude access allowed pursuant to a voluntary agreement;
5. Comply with any land use or resource use restrictions established or relied on in connection with the response activities at the facility; and
6. Not impede the effectiveness or integrity of any land use or resource use restriction employed at the facility in connection with response activities.

This ECM/ DCP is intended to fulfill the requirements of Part 201 of the NREPA of 1994, PA 451, as amended, as it pertains to potential due care requirements during the site and building demolition phase of the redevelopment for known releases of hazardous substances to the environment on the subject property. This ECM/ DCP is also intended to provide guidance related to the presence of asbestos containing materials (ACMs), cadmium/ lead containing paints, universal wastes, and crystalline silica/ nuisance dusts. This Plan does not address other potential unidentified environmental issues or safety hazards that may be associated with the site, which are specific to general construction safety.

The persons primarily responsible for the data assembly, interpretation, and technical conclusions presented in this ECM/ DCP are Mr. James Jackson, Senior Project Manager, and Mr. Dan Barton, P.E., Project Engineer, both of Otwell Mawby.

1.1 Current Site Development and Planned Redevelopment/ Use

The subject property is developed with a vacant former Big Boy restaurant with an adjacent parking lot and associated infrastructure. The existing development is depicted on the attached Figures 2 and 3.

The building is comprised of a two-story restaurant that is vacant. The basement encompasses 5,547-ft² and the first floor is 5,939.6-ft². There is a wood deck attached to the west side of the first floor and a concrete slab is adjacent to the west side of the walk-out basement. The basement has an eight-foot height and a 12-foot height is present on the first floor. The building is noted to have been constructed in 1970 and remodeled in 1983.

The subject property is serviced by available public utilities, which include Alpena Power Company electricity, DTE natural gas services, municipal water, and municipal sewer. DTE installed a two-inch, 60PSI natural gas main that runs along the north side of 14th Street. The main connects to a 9/8th-inch 0.25PSI natural gas line, which provides service the subject property. Telephone and other communication lines have also been known to service the subject property. **The connection status of the utilities that service the subject property are unknown.**

It is our understanding that the existing building and onsite infrastructure is to be demolished in the near future in accordance with a contract issued by the Alpena County Land Bank Authority.

At the time of this writing conceptual redevelopment plans (Appendix A) were available that indicate a three-story multi-family building (mixed use) with a 13,437-ft² footprint is to be constructed onsite. The redevelopment is known as Sunset Aurora. The building is proposed to be constructed in the western portion of the site along West Chisholm Street with the adjacent areas to be comprised of parking lot and areas of grass/ landscaping. An outdoor terrace will also be present that will be located and abut the adjacent Thunder Bay River. The lower level of the structure is to be comprised of an underground parking area with a janitor closet, trash room, and mechanical room. The main level of the building will contain a restaurant and a few small shops. The remaining two levels will contain residential units with connecting common areas. A shared outdoor entertainment space will also be present on the rooftop level of the building for use by the residents. The plans in Appendix A show the conceptual layout of each of the building floors. While it is assumed the redevelopment will be connected to and utilize typical

utilities (municipal water and sewer, electricity, natural gas (for heat), and communications), details of the utility locations were not available at the time of this writing. Additionally, no information was available related to future stormwater management plans for the site.

1.2 General Project Understanding

We understand the existing building and infrastructure are to be removed in order to facilitate the planned redevelopment discussed above. Conceptual details of the existing and planned redevelopment are contained within Appendix A. Reportedly, construction plans have not been issued for the redevelopment.

This ECM/ DCP has been completed for site infrastructure and building demolition activities and includes the general requirements, considerations and assumptions for this phase of the redevelopment. During the demolition phase of the work no onsite residences will be present. During this time access and use of the property will be limited to construction workers, staff, and other individuals involved in facilitating the demolition activities, as a result all exposure assumptions relate to nonresidential activities.

The future use of the site and the associated due care obligations are to be addressed by a subsequent document. Based on the post-redevelopment use of the subject property, Residential Criteria/ Screening Levels will apply as the use of the site will include mixed uses with staff, visitors, residents, and other persons utilizing the subject property on a regular basis, such as maintenance personnel, etc.

1.3 Previous Environmental Assessment Summary and Hazardous Substance Information

In 2024, several environmental investigations were conducted onsite, which included Phase I and II Environmental Site Assessment (ESAs), an asbestos inspection (initial and supplemental), and a hazardous material and universal waste inspection. The findings of these investigations are summarized below.

Phase I ESA: The report established the historical use of the subject property and identified two recognized environmental conditions (RECs) as indicated below:

> During the completion of the September 2024 Phase I ESA, the earliest readily available information regarding the use of the subject property was an 1895 Sanborn Fire Insurance Map that depicts the site as a vacant undeveloped parcel. The subject property appears to have been utilized for residential purposes beginning sometime between 1901 and 1910. By 1924, a commercial building was constructed onsite, which was occupied by an ice business. By 1939, a beverage distributer occupied the subject property as a warehouse. The historical residence appears to have been repurposed for beer and general storage. A gasoline underground storage tank (UST), of unknown size was also present onsite that was located between the two structures. The historical developments were reportedly demolished in 1971 to facilitate redevelopment of the existing building that was operated as a Big Boy restaurant until 2010, since which time the site has been vacant. At the time of the redevelopment the gasoline UST was reportedly removed but no assessment was completed. Overtime, the redevelopments, including in 1971, resulted in the placement of fill onsite, specifically within the existing parking lot areas. The origins of the fill are unknown.

Based on the historical use of the subject property two RECs were identified. The term REC, means the presence or likely presence of hazardous substances or petroleum products in, on, or at the subject: (1) due to a release to the environment (such as a previously identified release that has not yet been

addressed, or a visible spill of petroleum products or hazardous materials observed during the ESA site reconnaissance); (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment. The identified RECs are as follows:

1. Potential for impact from a historical gasoline underground storage tank (UST). The UST was reportedly removed from the site; and
2. Potential for impact from undocumented fill material bought onsite from an unknown origin.

Phase II ESA: The investigation was completed to determine if the RECs resulted in a release to the subject property. A summary of the investigation is detailed below.

- To evaluate the RECs, 11 soil borings were advanced and subsequent soil samples were collected and submitted for laboratory analysis of select parameters depending on the RECs. Four temporary monitoring wells were also installed and subsequently three groundwater samples were collected and submitted for laboratory analysis of select parameters associated with the RECs.

- One of the three soil samples (GP-7) contained constituents at concentrations in exceedance of Michigan Department of Environment, Great Lakes and Environment (EGLE) generic Cleanup Criteria (GCC). None of the groundwater samples contained any GCC exceedances, although, groundwater contained a petroleum odor and sheen at multiple locations.

- Isopropylbenzene was identified in excess of the EGLE Residential Volatilization to Indoor Air Pathway (VIAP) Screening Level in groundwater at the GP-9 location. None of the other soil or groundwater samples contained any VIAP Screening Level exceedances.
    - To date, assessment of this potential exposure pathway is not known to have occurred.

- Based on the GCC exceedances and aesthetic impact to groundwater, the subject property meets the definition of a "Facility", as defined by Part 201 of the Michigan Act 451 of 1994, as amended. Based on the presence of sheen and odor (aesthetic impact) observed in association with the groundwater samples, the site would also meet the definition of a "Facility", as defined by Part 201 of the Michigan Act 451 of 1994, as amended.

The impacts are the result of the historical operations conducted onsite and from the presence of urban fill materials. Copies of prior reports that document the activities are on file with Otwell Mawby.

Asbestos Inspection: In preparation for demolition of the onsite building, an inspection was completed that identified three materials as asbestos containing, as summarized in the following table.

Sample Number	Material Description (HA)	Sampling Location	Laboratory Analytical Result	Friable in Current State (Yes/ No)	Estimated Quantity and Location Identified
21A	Caulk, Black	Exterior, Around Window	10% Chrysotile	No	16-ft², Exterior, Around Windows (32 Windows, Each ~4' x 4')
21A	Caulk, Black	Exterior, Around Window	10% Chrysotile	No	24-ft², Exterior, Around Windows (24 Windows, Each ~4' x 4') 2-ft², Kitchen Entrance Door (1-Door, 3'x 7')
01-01	Gray Window Caulk	Exterior, Window Frame	4% Chrysotile	No	12-ft², Exterior, Window Frames (24 Windows, Each ~4' x 4')

The materials were abated in February 2025 and their removal was confirmed through a visual inspection that was performed by Otwell Mawby staff. Copies of the reports are contained in Appendix B.

Hazardous Material and Universal Waste Inspection: An inspection of the building was completed to determine the potential presence hazardous materials and universal waste products. The materials were removed in February 2025 and their removal was confirmed through a visual inspection that was performed by Otwell Mawby staff.

1.4 Detailed Characteristics of Property Use and Development Considerations

Once specifics of the redevelopment plans are finalized, this ECM/ DCP should be amended to reflect the changes to address potential unacceptable exposures that could arise into consideration for the future use of the site. This Plan has been generated to provide a generic analysis of the potential for exposures to onsite impacts during the demolition phase to prevent exacerbation of known contaminants, potential unacceptable exposures, and provides provisions necessary to mitigate those issues.

1.5 General Environmental Considerations

It is our understanding that the demolition phase of the work will include removal of the existing building and all existing onsite infrastructure, which will result in management of soil, groundwater, particulate, potential ACMs and cadmium/ lead containing paints, which will result in the following:

1. Potentially encountering environmentally impacted soil, soil gas and/ or groundwater;
2. Excavation of impacted soils to facilitate building/ infrastructure removal;
3. Landfilling of debris;
4. Replacing disturbed soils at their original place of origin;
5. Management of particulates, including but not limited to crystalline silica/ nuisance dusts;
6. Dewatering, if required, of trenches/ excavations to facilitate demolition activities;
7. Disposal of groundwater from areas dewatered as part of demolition activities, if required;
8. Stormwater and surface water management;
9. Management/ removal of ACMs and Universal Wastes;
10. Management of cadmium/ lead containing paints and disposal of the materials; and
11. Overall management of associated tasks to prevent a potential exposure to site workers/ future users and prevent exacerbation of known or suspected environmentally impacted media.

In the event additional activities not discussed within this ECM/ DCP are warranted or site conditions change, this document may need to be amended pending further evaluation. Any changes are to be completed by a qualified Environmental Professional.

1.6 Potential Environmental Impacts to be Encountered and Exposure Pathways

To date, environmental impact is present onsite, as a result it is likely that environmentally impacted media will be encountered that could contain various constituents, including volatile organic compounds (VOCs), semi-VOCs, metals, asbestos, etc. To address the potential impacts that could be encountered and resulting future management strategies, the following sections provide an exposure pathway evaluation and the appropriate methods for management of the environmental impacts that may be encountered during demolition related activities.

Additionally, the response actions required to be completed associated with potential encountered environmental impacts are also discussed in Section 2.0. The intent of the management methods and response actions are to ensure demolition activities comply with Federal, State and local environmental regulations, protect site workers and adjacent persons from a potential unacceptable exposure, and reduce or eliminate the potential for exacerbation of known or suspected environmental impacts during construction and for redevelopment. Anticipated activities/ scenarios that are likely to occur during redevelopment of the site that relate to encountering environmentally impacted media include:

1. To date all known ACMs have been removed but if encountered during demolition, they are required to be removed/ managed;
2. To date all known Universal Wastes have been removed but if encountered during demolition, they are required to be removed/ managed;
3. Demolition of the site structure that could have paints that contain cadmium/ lead;
4. Demolition of site concrete features and/ or removal and modifications of other site features could result in the presence of airborne crystalline silica and/ or nuisance dusts;
5. Soil excavation, including dermal contact with soil and/ or inhalation of soil particulates;
6. If warranted, management of excess soil generated from demolition activities;
7. If warranted, removal of unsuitable soils and other materials for future construction purposes;
8. Excess soil removed from personnel or equipment associated with demolition activities; and
9. If warranted, management of water generated from dewatering and/ or stormwater.

An exposure pathway analysis was completed considering the use of the subject property as a vacant construction site and the planned demolition activities. No redevelopment activities have been included or evaluated as part of this ECM/ DCP, although, the demolition activities are being completed to facilitate future redevelopment (conceptually depicted in Appendix A). The demolition includes removal of the existing building and infrastructure. Refer to Section 2.0 for details regarding the response activities to be employed to address potential environmentally impacted media at the subject property during demolition activities.

As this ECM/ DCP has been developed for the demolition phase the project, Nonresidential GCC/ VIAP Screening Levels have been used for evaluation of potential exposure pathways. Details regarding the identified hazardous substance concentrations, fate, transport and exposure pathways are provided in the following sections. Refer to the attached maps and tables, which depict the sample locations where the GCC/ VIAP exceedances were identified as part of the prior environmental investigation. Once demolition is complete it is intended that a subsequent exposure pathway analysis is to be completed as future use of the subject property will include a nonresidential component as well as a residential component, which could include potentially sensitive populations. Residential use of the subject property and any nonresidential uses that include potentially sensitive populations would warrant comparison to the Residential GCC/ VIAP Screening Levels.

Generally, the use of the subject property during demolition will not include the use or storage of chemicals other than those associated with the operation of construction equipment/ vehicles, which will only be present onsite on a temporary basis. No other chemical use during this phase of the project is anticipated but further chemical use/ storage should be evaluated by an Environmental Professional in the event it occurs to ensure in the event a release occurs it can be distinguished from any pre-existing impacts.

Demolition activities will include subsurface disturbance to facilitate removal of building and infrastructure components. Refer to the response activities in Section 2.0 for details regarding prevention

of a potential exposure and prevention of exacerbation. Once the redevelopment plans are completed and finalized, a Due Care Plan will need to be prepared for the future use of the site to address potential exacerbation of contamination and to mitigate potential unacceptable exposures.

Details regarding the identified hazardous substance concentration, fate, transport and exposure pathways are provided in the following sections. Potential human exposure pathways have been evaluated to determine whether any human exposure pathways are "complete" in light of site conditions at the commencement of and during the demolition activities. If the exposure pathway was considered complete, additional evaluation of the human exposure pathway was conducted to determine whether there would be "unacceptable exposures" for the completed pathway. Potential exposure pathways that were screened are noted below.

- Abandoned Containers;
- Ingestion of Groundwater;
- Soil Volatilization to Indoor Air Inhalation;
- Indoor Air Hazards Due to Volatilization of Soil Contaminants;
- Ambient Air Hazards Due to Volatilization of Soil Contaminants;
- Direct Dermal Contact with Contaminated Soil;
- Groundwater Flammability / Explosivity;
- Inhalation of Contaminated Soil Particles;
- Indoor Air Hazards Due to Volatilization of Groundwater Contaminants; and
- Groundwater/Surface Water Interface.

Post-redevelopment uses of the site have not been included as a subsequent document will need to be completed and issued to address the future use of the site. At the time of this writing, Otwell Mawby is not under contract to evaluate the future use of the site or the associated due care obligations.

The following sections present the screening of each of these potential human exposure pathways and whether or not the pathway is considered complete. Planned response activities and due care actions necessary to prevent unacceptable human exposures are presented in Section 2.0, Planned Response Activities, for those pathways that are complete.

1.6.1 Abandoned Containers

There are no abandoned containers known to be present at the subject property at the time of this writing; therefore, the presence of abandoned containers is not a complete human exposure pathway.

All containers brought onsite for use in demolition related activities are to be removed at the completion of the work scope by the contractors that brought the containers/ materials onsite. Removal, transportation and disposal/ recycling is to be completed following all local, State, and Federal laws.

1.6.2 Ingestion of Groundwater

No analytes were identified as part of the Phase II ESA at concentrations in excess of the EGLE Part 201 Nonresidential Drinking Water Protection (soil) and Drinking Water (groundwater) Criteria. However, aesthetic impacts to groundwater were observed.

Groundwater could be encountered during demolition activities due to its depth in relationship to the bottom level of the building and potentially the depth to existing utilities that are to be removed. In the event water needs to be managed to facilitate the scope of work, dewatering during construction would need to occur. Discharge of dewatering effluent would require the Contractor to manage the discharge

through a permit obtained through EGLE or the local municipality. These permits would allow a direct discharge to a surface water or into the municipal sewer system. **Under no circumstances shall groundwater from dewatering activities be discharged to any storm sewer, surface water body or elsewhere on the subject property site without further evaluation and authorization through receipt of an appropriate permit (National Pollution Discharge Elimination System (NPDES) or municipal permit).** No other uses of groundwater are anticipated as part of the construction activities as no potable drinking water supplies are present onsite or are to be installed onsite.

Additionally, as part of the redevelopment the new building will be reconnected to the municipal water system, therefore, the ingestion of groundwater is not a complete exposure pathway.

The response activities in Section 2.0 are to be implemented to prevent a potential exposure concern and prevent exacerbation of impacts.

1.6.3 Indoor Air Hazards Due to Volatilization of Soil Contaminants (Vapor Intrusion)

The demolition phase of the work includes removal of the existing structure. During demolition no permanent structures are to be present onsite, although, a portable construction office trailer may be present onsite. As no permanent structures are planned to be onsite during the demolition phase of the project, this pathway is not complete. However, during demolition activities potentially harmful vapors could be encountered due to potential soil gas impacts on the subject property. While no known exceedances of the Part 201 Nonresidential Volatilization to Indoor Air Criteria (SVIC) or Screening Levels are present, the response activities in Section 2.0 are to be implemented to prevent a potential exposure concern during construction activities.

Future redevelopment activities will need to evaluate this pathway future to determine if its complete.

1.6.4 Ambient Air Hazards Due to Volatilization of Soil Contaminants

No contaminants were identified in soils at concentrations in excess of the EGLE Part 201 Soil Volatilization to Ambient Air Inhalation. However, refer to the response activities in Section 2.0 that are to be implemented related to potential soil gas during demolition activities.

1.6.5 Direct Contact with Contaminated Soil

No constituents in soils were identified at concentrations in excess of the Part 201 Nonresidential Direct Contact (DC) Criteria. Therefore, this potential exposure pathway is not considered complete. However, refer to the response activities outlined in Section 2.0 that shall be instituted to prevent a potential exposure to site workers. Additionally, in the event any soils are to be brought onsite and used for fill, etc., they are to be confirmed to be free of contaminants and samples will be analyzed by a third-party independent laboratory prior to being brought onsite to confirm the absence of environmental impact associated with fill (sand/ topsoil, etc.).

1.6.6 Groundwater Flammability / Explosivity

Groundwater is not known to be impacted at concentrations in excess of the Part 201 Flammability/ Explosivity Screening Level; therefore, this potential exposure pathway is not thought to be complete. However, groundwater could be encountered during demolition due to its depth and excavations required to be completed to facilitate the building/ infrastructure removal. The response activities in Section 2.0 are to be implemented to prevent a potential exposure concern and prevent exacerbation of impacts.

1.6.7 Inhalation of Contaminated Soil Particles

None of the detected constituents were identified at concentrations in excess of the Part 201 Inhalation of Contaminated Soil Particles Criteria. However, during demolition activities contaminated soil could be exacerbated if airborne dusts are not managed and/ or prevented from becoming airborne. It is likely that during demolition this potential exposure pathway could be complete. Dust minimization techniques and/ or personal protective equipment will be utilized during redevelopment. Refer to Section 2.0 for discussion of the planned response activities that are designed to mitigate exposure to particulates.

1.6.8 Indoor Air Hazards Due to Volatilization of Groundwater Contaminants (Vapor Intrusion)

As part of demolition activities, no permanent structures are to be present onsite until redevelopment commences. Although, a portable construction office trailer may be present onsite. As no permanent structures are planned to be onsite during the demolition phase of the project, this pathway is not complete. Groundwater is likely to be encountered during demolition activities to facilitate removal of the existing building and infrastructure. There are no Nonresidential exceedances of the Part 201 Groundwater Volatilization to Indoor Air Inhalation Criteria (GVIC) or Screening Levels. As groundwater is anticipated to be encountered, the response activities in Section 2.0 are to be implemented to prevent a potential exposure concern and prevent exacerbation of impacts.

Future redevelopment activities will need to evaluate this pathway future to determine if its complete.

1.6.9 Groundwater/Surface Water Interface

Several semi- VOCs were identified onsite at concentrations in excess of the Groundwater Surface Water Interface Protection (soil) Criteria. No constituents were identified in groundwater samples above the Groundwater Surface Water Interface (groundwater) Criteria.

For the GSIP/ GSI to be considered relevant or a complete pathway surface water would have to exist or be in relative proximity to the subject property. There are no onsite water bodies but the Thunder Bay River immediately abouts the subject property, as a result, this pathway could be a relevant or potentially complete. Refer to Section 2.0 for planned response activities related to this exposure pathway.

2.0 PLANNED RESPONSE ACTIVITIES

Potential environmentally impacted materials will be encountered during demolition activities, as a result, the response activities discussed below must be implemented. The activities may also need to be revised based on conditions encountered during demolition activities. For future use of the subject property, a supplemental document is to be generated to address the potential for future exposure and exacerbation to occur.

2.1 Responsibilities

To ensure enforcement of health and safety activities onsite, an appropriate managerial person shall be appointed by the Contractor, who would be responsible for ensuring that all personnel performing fieldwork activities at the site have been informed and adhere to the requirements of the HASP(s) for the site and this ECM/ DCP by conducting an initial training related to site impacts, potential exposures and exacerbation potential. The initial training is to be supplemented, as needed, with daily site safety briefings before the initiation of site work; reporting any safety concerns immediately to the designated person, such as the Project Manager/ site Civil Engineer and/ or Environmental Professional, etc. The designated person shall also have the authority to stop work at the site should the safety and health of onsite workers or others come into question, including all subcontractors. All personnel performing fieldwork activities at the site shall also be trained with the provisions included in this ECM/ DCP.

Changing field conditions may require decisions to be made concerning adequate protection programs. Therefore, all personnel assigned in a supervisory role are to be experienced and have had appropriate safety training(s) to implement the appropriate response actions.

At times when construction personnel are not present on the subject property, the site shall be secured to prevent unauthorized entry. Work areas shall be marked and barricaded to prevent fall hazards, etc.; the general public shall be prohibited from entering work areas.

2.2 Task Risk Evaluation

Activities that could include contact with impacted media will vary based on the individual job descriptions of the contractors and subcontractors working onsite, as a result, each must have their own site-specific HASPs to provide an evaluation of their individual tasks. However, the following table summarizes the general guidelines associated with potential hazards, risk level, and justification for persons that may come into contact with the impacted media onsite.

Hazard	Risk Level	Justification
Chemical	Moderate to High	Chemical hazards associated with silica (building demolition), soil, groundwater/ dewatering water and potentially soil vapors are known to be present onsite and will be encountered by specific contractors directly involved in the disturbance and potentially others working in close proximity. Additionally, previously unidentified ACMs or universal wastes could be encountered. Due to the age of the structure, cadmium/ lead containing paints could also be encountered.

The required level of protection/ personal protective equipment (PPE) will be Level D, which is to be worn for all tasks in contact with impacted media, unless a higher level is specified by the Project Manager or others. Level D PPE consists of safety glasses, work gloves, and work boots. When in contact with impacted media or suspected media, Tyvek or a similar product shall be used to prevent contact with the skin and clothing (Modified Level D). Additional PPE (Modified Level D) may be worn to protect hearing when working around heavy equipment, to avoid contact with potential biological hazards, to prevent exposure to the sun and other weather-related hazards, and to keep workers clean. Handwashing and boot cleaning stations are to be available onsite to prevent soils from leaving the property by workers. Also, refer to the discussion below related to equipment decontamination procedures. When work is completed, personnel shall thoroughly clean their hands with water and soap and rinse work boots of any soil/ debris. Subcontractors are to perform work under their own HASP while supplementing their document with this ECM/ DCP. In addition, a First Aid Kit and Bloodborne Pathogens Kit shall be available onsite.

In the event previously unidentified ACMs are identified, a State of Michigan licensed asbestos abatement contractor is to be contacted immediately to handle and dispose of the material. No disturbance of the material by the demolition contractor is to occur. The selected asbestos contractor would be responsible for incorporating their own HASP into their work scope.

The following table identifies the level of personnel protection that is to be employed on the subject property during times when potential environmental impacts could be encountered, unless other precaution/ PPE are determined to be necessary based on the impacts encountered.

Protective Equipment	Level D	Level D Modified	Level C Modified
Head: Hart Hat		X	X
Eye and Face: Safety Glasses or goggles	X	X	X
Respiratory protection consisting of a full-face respirator with appropriate cartridges and/ or canisters			X
Hearing: Ear plugs or muffs, as necessary		X	X
Appropriate work uniform	X	X	X
Whole body: Tyvek or similar covering, as necessary		X	X
Hand: leather or similar material work gloves, as necessary		X	X
Gloves: Inner as necessary to keep clean		X	X
Gloves: Inner surgical			X
Foot: Safety boots/ shoes (steel toe and shank)	X	X	X
Boots: Water resistant over-boots, as necessary		X	X
Other: Sunscreen, as necessary	X	X	X

It is the responsibility of the Contractor to ensure the response activities described herein are maintained and if warranted, revised in the event site conditions change from those described above.

2.3 Excavations/ Confined Spaces

The majority of activities completed onsite during demolition activities have the potential to encounter impacted materials related to completion of excavations and disturbance of the ground surface.

Entry into confined spaces during the performance of the demolition activities is prohibited by all personnel, contractors, and subcontractors without proof of current MIOSHA/OSHA-required confined space training. Entry into unshored excavations is also prohibited as such may qualify as confined space entry.

The excavation of soils will be conducted in accordance with 29 CFR Part 1926, Subpart P. All excavation areas will be inspected to determine whether or not conditions exist which may require special safety measures including the placement of pre-engineered trench shields, shoring, or overcutting. Excavations will not be entered by field personnel without first monitoring the quality of air, as detailed in the corresponding section below. When the excavation is determined to be safe for entry by site personnel and its subcontractors, the work area will be entered cautiously and continuously monitored for physical and chemical hazards. In the event that an excavation will be left unattended for an extended period of time, a barricade will be installed using temporary fencing, caution tape, signage, etc. Personnel working in excavations and/ or confined spaces are to have company specific HASPs to address the specific details of their work scopes.

The site Project Manager/ Project Superintendent shall be contacted immediately should confined spaces that may have to be entered be encountered at a site. The Project Manager/ Project Superintendent shall then determine if entry is necessary and arrange for the necessary employee training, safety equipment (full-body harness, recovery system, hazardous gas meter, etc.), and personnel. Entering confined spaces may require additional health and safety precautions beyond those presented in this document. Any confined spaces, if present, shall be evaluated on a case-by-case base prior to entry to determine the appropriate measures to be employed.

2.4 Response Activities

The following response activities are planned for the subject property to address potential environmental impact that is anticipated to be encountered during demolition activities.

General Response Activities:

1) If plans other than those discussed within this ECM/ DCP are developed or modifications made to those discussed herein, this document should be reviewed, and if required, amended, to ensure the generic details of this Plan do not need to be modified or additional measures implemented in order to prevent a potential exposure or exacerbation of impacts. Any modifications to this plan should be reviewed by an Environmental Professional prior to implementation.

2) The demolition contractor is responsible to obtain all permits to facilitate the demolition activities. Permits may be required to be obtained from the City of Alpena, Alpena County and/ or the State of Michigan, etc.
    a. As the onsite building was used for commercial purposes, a 10-business day notification must also be filed with EGLE prior to the commencement of demolition activities. The notification is required to be filed through EGLE to satisfy the requirements established under the National Emission Standard for Hazardous Air Pollutants (NESHAP).

3) Contractors, easement holders, and any site workers (such as construction and utility personnel) will be advised as to the nature and location of known and/ or suspected contaminated media at the subject property and the measures necessary to protect themselves from unacceptable exposure to the contamination.

4) It is expected that various gasoline and/ or diesel fueled equipment and/ or generators will be used onsite to facilitate construction activities. It is also expected that other construction related products such as marking paints, pipe adhesives, etc. will be utilized to facilitate construction activities. To prevent a release to the environment, precautions shall be taken by the contractor to ensure that such use will not result in a release of chemicals on the subject property. Chemicals stored onsite shall be placed within spill containments designed to hold at least 110% of the volume. In the case of a release of hydrocarbon fuels or any hazardous substances, the contractor is responsible to fully address the release, including but not limited to removing all affected soils, treating all affected groundwater/ surface water, and fulfilling any regulatory reporting requirements.

   In the event of a spill or release of a hazardous material, the first priority shall be to ensure the safety of site personnel and evacuate the area, if necessary. Assess the situation and perform containment and control measures as appropriate per the following:

   1. Cleanup per Safety Data Sheet (SDS (if small quantity)) or call for assistance (if large quantity or if potential hazard is beyond training level).
   2. Evacuate to a pre-determined safe place.
   3. Account for site personnel.
   4. Notify the Project Manager regardless of the spill size for further instructions.
      a. The owner/ operator is to be notified and a determination will be made as to whether the site Environmental Professional needs to be contacted.
      b. The appropriate agency to be notified following spill reporting requirements.

   In the event of a fire or explosion, ensure personal safety, assess situation and perform containment and control measures as appropriate.

   1. Use fire extinguisher only if safe to do so and make sure you have safe egress from the area. All personnel using fire extinguishers must be trained in use of the equipment prior to employing it.
   2. If a fire cannot be easily extinguished, alert other onsite personnel and **CALL 911** for assistance.
   3. Evacuate to a pre-determined safe place.
   4. Account for personnel.
   5. Standby to inform emergency responders of materials and conditions. Notify the Project Manager or the appropriate person in a managerial role.
      a. The owner/ operator of the subject property is to be notified by the General Contractor.

   Each contractor/ subcontractor shall have the appropriate fire extinguisher available onsite and in good working order to respond to a fire/ explosion created by their activity. Additional evaluation of the appropriate fire extinguisher is to be detailed in the HASPs to be created by each individual contractor/ subcontractor, which is to be designed to evaluate their specific work tasks.

5) Construction contractors and their personnel should refer to 29 CFR Part 1926 for additional information regarding federal health and safety requirements applicable to the construction industry. Additional information is also available at the Occupational Safety and Health Administrations' web site at www.osha.gov, the Michigan Department of Licensing and Regulatory Affairs web site at www.michigan.gov/lara, and the links contained on those web pages.

This document does not take the place of a site-specific HASP. **Each Contractor or Subcontractor is responsible for preparing and implementing a site-specific HASP covering their activities.** A HASP must be developed using general safety requirements to reduce the potential for personal injury, illness, and physical damage to equipment and property, training, medical surveillance, work site evaluations, PPE, hazard assessment criteria, site controls, and decontamination procedures. Each HASP should account for the planned work activities and the site conditions to be encountered. In addition, each contractor/ subcontractor is responsible for ensuring that their subcontractors either 1) prepare and implement their own site-specific HASP; or 2) adhere to the overseeing Contractors HASP. Each contractor and subcontractor is also responsible for providing the Project Manager a copy of their HASP. At a minimum, the HASP must be prepared in accordance with the requirements of the following:

- **All personnel working onsite with tasks that include soil/ groundwater handling must have current training and certifications provided that are in accordance with Occupational Safety and Health Administrations (OSHA's) Hazardous Waste Operations and Emergency Response (HAZWOPER) standards (in general industry, 29 CFR 1910.120; and construction 29 CFR 1926.65).**
- 29 Code of Federal Regulations (CFR 1910.120: *Safety and Health Regulations for General Industry*, OSHA, as amended, December 1986.
- *Standard Operating Safety Guides*, U.S. Environmental Protection Agency (EPA), 1992.
- *Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities,* National Institute of Occupational Safety and Health Administration (NIOSH), Publication No. 15-115, October 1985.
- All operations, procedures, and equipment at the Property will meet the applicable requirements of OSHA 1910 and 1926.

The HASP shall also include provisions for compliance with the following regulations:

Asbestos:
- Michigan Public Act 154 of 1974 "Michigan Occupational Safety and Health Act".
- Michigan Public Act 135 of 1986 "Asbestos Abatement Contractors Licensing Act".
- Michigan Public Act 440 of 1988 "Asbestos Workers Accreditation Act".
- OSHA 29 CFR 1926.1101 "Asbestos Standard for Construction".
- OSHA 29 CFR 1910.1001 "Asbestos Standard for General Industry".
- 40 CFR 763, the "Asbestos Hazard Emergency Response Act (AHERA)".
- 40 CFT Subpart M, the "National Emission Standard for Hazardous Air Pollutants (NESHAP)".

Cadmium/ Lead Paints:
- MIOSHA Construction Safety and Health Standard Part 609, Cadmium in Construction.
- MIOSHA Construction Safety and Health Standard Part 603, Lead in Construction.

Universal Wastes:

- United States Environmental Protection Agency's Universal Waste Rule, 40 CFR 273.
- Resource Conservation and Recovery Act (RCRA).
- EGLE Rule 299.9228.

Crystalline Silica/ Nuisance Dust:

- NIOSH Part 690, Silica in Construction.
- MIOSHA Part 590, Silica in General Industry.
- EGLE Rule 336.1106 (k (Nuisance Dust)).

6) Onsite workers should be informed and trained in the potential hazards associated with asbestos, universal wastes, cadmium/ lead containing paints, in soil, groundwater, and soil gas, with appropriate precautions to prevent a potential exposure with guidance as to how to screen for impact and guidance for management of these media. Specific measures will be developed by the associated contractor/ subcontractor or the site Environmental Professional when environmental impact is encountered or anticipated to be encountered. The measures will incorporate the specifics of the environmental impact (concentrations, type of contaminant, media impacted, worker training, field monitoring, assessment of impact, management of impacted soil and/ or groundwater, etc.). Below are details related to encountering and managing environmentally impacted media or suspected impacts.

Asbestos Containing Materials:

1) An Asbestos Inspection Report (Appendix B) has been completed for the onsite structure and the identified ACMs were removed in February 2025.
2) In the event any ACMs or suspect ACMs are identified during demolition they are to be :
    a. Removed by a licensed asbestos abatement contractor following all local, State and Federal regulations.
    b. Any work that has the potential to disturb the ACMs must be completed by a qualified asbestos abatement contractor licensed by the State of Michigan Department of Licensing and Regulatory Affairs, Asbestos Program.
        i. The Contractor is responsible for employee training requirements that shall follow the guidelines required by OSHA and as outlined in State of Michigan Public Act No. 147 of 1986.
            1. The Contractor is responsible for employee PPE, including but not limited to all respiratory protection equipment. All PPE shall be provided to workers in accordance with the Contractor's submitted written respiratory protection program, which includes all applicable items of OSHA 29 CFR 1910.134 and CFR 1926.1101.
            2. Protective clothing shall be worn during all work activities inside the regulated asbestos removal area(s) and while handling or disposing of asbestos containing waste.
    c. All asbestos removal (abatement) shall be completed in strict compliance with OSHA 29 CFR 1926.1101 (G) Methods of Compliance.
    d. The Contractor shall remove and dispose of all ACMs following all local, state and federal laws.
    e. The Contractor shall be responsible for all aspects of the handling and transport of asbestos-containing materials and shall conform to U.S. Department of Transportation regulations (49 CFR 173.1909) and NESHAPS (40 CFR 61, Final Rule). Bills of lading

shall identify the asbestos waste with the proper North American shipping number, "NA 2212, PG lll)."

f. For all asbestos-containing wasted material transported off site, the NESHAP revisions require that a waste shipment record be provided to the waste site owner or operator at the time that the waste is delivered to the waste disposal site. Permanently affixed labels are required on bags, drums, and other containers of asbestos containing waste material from demolition, renovation, and abatement activities indicating the name of the waste generator and the location where the waste was generated.
g. During removal of ACMs, air monitoring shall be completed, which at a minimum includes personal exposure monitoring, including excursion limit monitoring, as required under the OSHA asbestos standard for the construction industry (29 CFR 1926.1101). Air monitoring shall also be completed in accordance with the NESHAPs, which requires environmental (area) monitoring.
    i. All samples shall be collected and analyzed by a third party, at no cost to the Contractor, using NIOSH 7400 Revision 3 methods.
h. No smoking, eating, or drinking is permitted within the designated asbestos work area(s) during removal of the ACMs or asbestos contaminated materials.
i. Third party environmental monitoring shall also be completed for compliance with applicable NESHAPs Standards, at no cost to the Contractor.

Universal Wastes:

1) A Universal Waste Inspection Report (Appendix C) has been completed for the subject property. A list of the identified universal wastes are indicated in the table attached to the report. In February 2025, the materials were removed.
    a. The United States Environmental Protection Agency's (USEPA's) Universal Waste Rule, as adopted by the State of Michigan, governs the collection and management of widely generated waste products to prevent environmental contamination and promote recycling or treatment. The Universal Waste Rule allows for the collection, recycling, treatment, and disposal of household quantities of these materials to prevent over-disposal and concentration of hazardous wastes within landfills.
    b. In the event any materials have accumulated onsite or are discovered during demolition, they are to be recycled/ disposed following all requirements established under the United States Environmental Protection Agency's Universal Waste Rule, 40 CFR 273, RCRA, and EGLE Rule 299.9228.

Cadmium/ Lead Containing Paints:

1) According to tax assessment records, the onsite building was constructed in 1970 and remodeled in 1983.
2) To date it is not believed that paints on the structure have been sampled to determine the potential presence of cadmium/ lead.
    a. The contractor completing the demolition work is required to be trained according to the MIOSHA Health Standards, Part 309, Cadmium in General Industry and Part 603, Lead Exposure in Construction.
    b. In the event cadmium or lead are present, occupational monitoring shall also be completed for compliance with the Part 309 and 603 Standards to evaluate potentially unacceptable exposures to site workers.
3) There has been an update to the definition of an "inert material" per Section 11504 (2)(e) (Part 115, Solid Waste Management, of Act 451 of 1994, as amended and its administrative rules). The following is a citation for the "inert material" definition as it applies to lead paint on masonry surfaces:

324.11504 Definitions; H to P.
Sec. 11504.
(7) "Inert material" means any of the following:
(*iv*) The placement of the debris does not violate federal, state, or local law or create a nuisance.
(e) Construction brick, masonry, pavement, or broken concrete that is reused for fill, rip rap, slope stabilization, or other construction, if all of the following conditions are met:
(*i*) The use of the material does not violate section 3108, part 301, or part 303.
(*ii*) The material is not materially contaminated. Typical surface oil staining on pavement or concrete from driveways, roadways, or parking lots is not material contamination. Material covered in whole or in part with paint that contains more than 0.5% lead is materially contaminated.

If any of the painted materials meet the definition above are to be used as an "inert material" the EGLE, Designation of Inertness #17-I-003, should be referenced and its conditions met prior to the materials being disposed at any location other than a licensed landfill. Prior to materials generated onsite being used as an "inert material" written permission from the property owner must also be obtained.

4) Prior to commencement of demolition, the landfill where the materials are to be disposed should be contacted, to determine if any characterization of the waste is warranted or if they will accept the waste based on the provided results.

Crystalline Silica/ Nuisance Dusts:

1) Crystalline silica is a basic component of soil, sand, granite, and many other minerals. Based on the potential for exposures to crystalline silica during site demolition and reconstruction activities, the Contractor is required to comply with the MIOSHA Part 590, Silica in General Industry and NIOSH Part 690, Silica in Construction. Employers are required to complete the following for compliance with the Standards:
    a. Establish and implement a written exposure control plan that identifies tasks that involve exposure and methods used to protect workers, including procedures to restrict access to work areas where high exposures may occur.
    b. Designate a competent person (construction only) to implement the written exposure control plan.
    c. Where feasible, prohibit housekeeping practices that generates an uncontrolled release of silica dust and contributes to employee exposure.
    d. Offer medical exams, including chest X-rays and lung function tests every three years for workers who are required by the standard to wear a respirator for 30 or more days per year (Construction). General Industry requires medical exams when employees are exposed over the Action Level for 30 days per year.
    e. Train workers on work operations that result in silica exposure and ways to limit exposure.
    f. Keep records of workers' silica exposure and medical exams.
    g. The Contractor is also responsible for any other requirements set forth in the Standards. Associated costs are the responsibility of the Contractor and are considered incidental to the project cost.
2) Per the NESHAP EGLE Rule 336.1106 (k (Nuisance Dust)) Standards, the Contractor is required to manage potential nuisance dust/ particulate matter generated from the execution of onsite activities. The Contractor is required to comply with all portions of the Standards in addition to

those indicated within this ECMP. Associated costs are the responsibility of the Contractor and are considered incidental to the project cost.

Underground Storage Tanks:

1) While no underground storage tanks (USTs) are known to remain onsite, in the event USTs are encountered work should cease in the immediate vicinity of the identified tank until which time the integrity of the tank can be assessed and the appropriate parties are notified to conduct a closure assessment, including developing a plan for fluid and/ or soil management and regulatory reporting procedures. Removal shall not commence without approval by the Construction Manager and/ or Owner and the designated Environmental Professional.

Soil, Soil Gas and Soil Particulate Response Activities:

1) Soil excavated from areas suspected to contain environmental impact or from known areas of impact shall only be used as backfill in the immediate area/ depth from which it was excavated, unless otherwise approved by an Environmental Professional.
    a. If soils are encountered that could result in future settlement issues or present other potential concerns for future use of the site, the Project Manager shall be consulted to determine if the soils should be landfilled prior to replacement within their place of origin.
    b. Refer to Items #2 and #3 in this Section for discussion related to stockpiling of soils for landfill disposal.

2) Soils located on the subject property within areas of known or suspected impact will not be relocated to any other property or other areas of the subject property without further evaluation by the site Environmental Professional or through consultation with the Project Manager. As part of site demolition activities, no soils should be removed from the subject property. In the event soils need to be removed from the site, they are to be landfilled unless determined to be non-impacted, which will require additional characterization prior to offsite transport and disposal. It is likely any disposal will require completion of waste profiles and/ or additional characterization, the extent to which will be determined by the permitting agency/ disposal facility. Any characterization should be discussed with the landfill in advance of offsite transport to ensure their acceptance of the waste. In consultation with the site Environmental Professional and the Project Manager/ site Civil Engineer, a soil staging area will be determined, if necessary, as a designated location where stockpiled soils are to be staged to await offsite transport and landfill disposal.

3) Any segregated and staged soil shall be covered with poly sheeting and a berm constructed surrounding the staged material to prevent erosion. The soil shall also be placed on poly sheeting to prevent their comingling with other soils within the staging area. The poly sheeting shall also be installed to prevent transporting the soils to adjacent areas via wind, precipitation, erosion, etc. A minimum of 6-mil poly sheeting shall be utilized for containing stockpiled soil.
    a. Soil not known or suspected to be environmentally impacted shall be stockpiled separately from those with containing known or suspected contaminants. These soils may require separate characterization for disposal than those known or suspected to be contaminated.

4) Any soils brought onsite to be used as fill or for any other purpose are to be deemed acceptable by the Owner and the site Environmental Professional.
    a. The source of backfill is to be verified not to be environmentally impacted and chemical testing may be required prior to importation of materials. The origin of the materials to

be used onsite must be from a virgin, non-environmentally impacted site, sourced from a location that was not used for industrial operations or from an agricultural site where chemicals were applied that that could result in exceedances to GCC established under Part 201 of Act 451 of 1994, as amended, or other applicable comparison criteria, as selected by the site Environmental Professional.

b. The source of backfill and topsoil is to be provided to the Owner/ Project Manager and/ or the site Environmental Professional a minimum of 30 days in advance of planned transport of the materials onsite to determine its acceptance for use onsite. Requested analytical parameters are to be determined by the site Environmental Professional based on the source of the materials.
    i. Backfill is to be comprised of a suitable material, the determination of which is to completed by the Project Manager, the site Civil Engineer and/ or the site Environmental Professional.
    ii. Acceptable fill soils shall be obtained or produced from approved sources and shall consist of mineral soil having durable (non-calcareous) natural material or granular aggregates as combined with sand, stone, dust, or other filler materials to provide a uniform mixture. Included as common earth are such soils as silty sand, glacial till, and sand. Acceptable soil shall also be substantially free or organic materials, loam, wood, trash, or other objectionable materials that may be decomposable, compressible, or that cannot be properly compacted.
    iii. Imported topsoil shall be environmentally-clean, naturally-occurring soil capable of effectively supporting vegetative growth and free of debris, snow, ice, or water, and not frozen to the extent practical. As noted above, the source of the topsoil is to be preapproved by the Project Manager, the site Civil Engineer and/ or the site Environmental Professional prior to being brought onsite.

5) During demolition activities, workers shall minimize direct dermal contact with soil via the use of gloves and work clothing or disposable over-cloths to minimize exposed skin area. Exposed skin should be washed thoroughly with soap and water as soon as possible after exposure. Gloves and work clothing should be cleaned of soil each day before leaving the site, and if necessary, laundered before being worn again.
    a. If necessary, additional worker protection measures shall be established in a site-specific HASP by the Contractor or their sub-contractors to detail a plan to prevent dermal contact to soil. As part of the HASP a hand washing station should be required to be provided onsite for workers.
    b. Any known or suspected contaminated materials removed from a person's clothing/ tools/ equipment, etc. shall be managed as that being removed from equipment, tools, etc., as discussed below.

6) All construction equipment, transport trucks and tools brought onto the site during demolition activities, shall not have adhered soil, if present, on them prior to leaving the site. A specific decontamination area is to be established onsite by the construction Manager. Soil is to be removed using a brush or other methods prior departing the site. Any removed soils shall be segregated and managed as indicated above. In the event water is used to remove known or suspected impacted soils, the water, if not used in limited or liberal amounts would need to be contained and/ or managed with construction dewatering effluent, as detailed below.

7) During construction activities within areas of known or suspected impact, air monitoring shall be completed, especially when personnel are located within excavations/ trenches.

When personnel are located within excavations and periodically when excavations are open with personnel working in adjacent areas, and other times deemed prudent by onsite personnel, ambient air screening for potential volatile organic compounds (VOCs) shall be completed. Monitoring shall be completed using a photoionization detector (PID) with a minimum of a 10.6 eV lamp. A PID monitors for VOCs. Typically, a PID has an alarm that is set to trigger at 5% of the lower explosive limit (LEL). To ensure the PID is working properly, daily field calibration is required in addition to manufacturer recommendations for maintaining the unit to ensure its in proper working order. It is recommended that the actions noted in the following table be implemented based on the PID screening.

PID Reading	Required Action
0-5 ppm or below the Action Level	Wear Level D PPE, continue to monitor with PID or other approved device in the workers breathing zone.
>5 ppm on PID or at the Action Level	If organic vapor concentrations reach five (5) ppm in the breathing zone and/or results are at the Action Level designated in the referenced literature, workers shall be evacuated from the area to a location upwind where air monitoring reading is 5 units or less. The Project Manager shall be contacted for instructions regarding how to proceed. If re-entry is authorized, a minimum Level C respiratory protection shall be required (i.e., full-face respirator with appropriate cartridges and/or canisters), as well as, other protective measures, as specified in the referenced literature, until which time vapor dissipate to below acceptable levels. If dust is visible, then work will be halted and dust suppression activities will take place.
>25ppm on PID or above Action Level	Emergency evacuation of the site shall occur. The site shall be secured to prevent unauthorized entry and no one shall be allowed to enter the site until the Project Manager, in conjunction with the Onsite Safety Coordinator, has determined it is safe to do so.
ppm – parts per million	

If vapors are present, additional health and safety precautions maybe required such as the use of PPE, trench ventilation, or other engineering controls. Typically, PPE that would be employed consist of respirators with attached organic vapor cartridges, although, the specific type of respirator and cartridge is to be selected by the contractor completing the work. The use of respirators requires compliance with the OSHA Respiratory Protection Program (1910.134), which includes written work-specific procedures, a program evaluation, selection of appropriate respiratory protection equipment, training, fit testing, etc. In the event field screening indicates a potential buildup of VOCs, a site-specific work plan will be evaluated to prevent a potential exposure.

It is also recommended that excavations be evaluated for oxygen content, combustible gases, hydrogen sulfide gas, and carbon monoxide using a Gastech GX-86 or equivalent device, as summarized in the table on the following page.

Meter Constituent	Typical Alarm Setting Ranges (Vary by Unit/ Manufacturer/ Calibration Type)
Oxygen (O2)	Low= 20.5%, High= 21.5%
Hydrogen Sulfide (H2S)	Low= 25 ppm, High= 20 ppm, STEL= 5 ppm
Lower Explosive Limit (LEL)	Low= 5%, High= 10%
Carbon Monoxide (CO)	Low= 50 ppm, High= 200 ppm, TWA= 25 ppm, STEL= 200 ppm
ppm – parts per million TWA – Time Weighted Average	STEL – Short Term Exposure Limit (typically 30 minutes)

Relying on any sampling devices requires it be up to date on maintenance requirements and calibrated as required by the manufacturers.

As particulate are likely to be generated by onsite activities, measures must be instituted to minimize dusts, especially those originating from onsite. Dust prevention measures must be completed in compliance with EGLE Rule 336.1106K (nuisance dust) and the 40 CFR Subpart M, the NESHAPs. It is recommended that dust generating activities be completed, when feasible, during times of or following precipitation events, otherwise dust misting equipment should be employed. The use of water should not result in excessive pooling/ pudding, or result in an unacceptable health and safety risk, such as slips, trips and falls, electrocution, etc. Dusts shall be controlled from leaving the site and no visible emissions shall be permitted.

Refer to discussion related to particulate reduction measures, which would suppress potential airborne concentrations of contaminants that may be encountered during demolition activities. Additionally, the potential for airborne nuisance dust is also discussed below in the corresponding section below.

Concentrations of VOCs, semi-VOCs, metals and other constituents of potential concern could be present at levels that exceed the Permissible Exposure Limits (PELs). Measures should be implemented, as discussed below, to reduce the potential airborne concentrations and associated exposures.

a. If vapors or particulate are present additional health and safety precautions may be required such as the use of PPE (protective clothing, eyewear, gloves, respirator, etc.), trench ventilation, or other engineering controls to keep potential contaminant levels below the applicable PELs. A specific plan to screen for potential soil vapors shall be developed, if determined to be necessary based on elevated field screening levels.
    i. Initially, to determine if vapors are present at potentially harmful levels field screening devices such as a PID, formaldehyde detector, etc. shall be used to verify contaminant levels are below the PELs.
b. If vapors or particulate could be impacting areas adjacent to the subject property an air monitoring plan may also need to be developed to evaluate adjacent receptors such as businesses, residences, parks, people, etc. An Environmental Professional or a person deemed by the Project Manager, General Contractor and/ or the Owner to be qualified is to complete this evaluation.
c. The presence of vapors or particulate could also result in the presence of nuisance odors. To prevent the potential buildup of nuisance odors, limiting the excavation/ trench sizes, using barriers, such as tarps, sheeting, or other products could be used as a management tool.

In the event vapor monitoring within the work areas indicates potentially harmful levels of vapors, monitoring in the adjacent area, including outside of the work area, may be warranted. In the event any potentially harmful levels of gases are identified, work in the area shall cease and the Project Manager, General Contractor and/ or the Owner shall be notified immediately to determine the appropriate course of action.

Monitoring for metals can be completed, although, laboratory analysis of metals cannot be completed onsite or in typically less than 24 hours from sample collection.

8) Equipment and tools utilized within areas of known or suspected environmental impact should be decontaminated prior to leaving the work site. Soil within areas of known or suspected impact should be removed using a brush or other method prior to working in adjacent areas. Any removed known or suspected contaminated soil shall be segregated and managed as indicated above. In the event water is used to remove known or suspected impacted soils, the water is to be contained and managed with construction dewatering effluent, as detailed below.

Personnel and equipment decontamination shall follow the steps below, in the order presented:

1) Segregated equipment drop	Drop equipment in the designated area for decontamination. Decontaminate equipment before removing PPE. If equipment is to be disposed, place in designated waste container. Reusable equipment is to be scrubbed clean of debris, if water required, use sparingly. Generation of large volumes of water is prohibited.
2) Tape removal – outer glove and boot	Place in designated waste container.
3) Boot cover removal	Place in designated waste container.
4) Outer glove removal	Place in designated waste container.
5) Protective suit removal (coveralls, Tyvek or similar material, etc.)	Place in designated waste container.
6) Inner glove removal	Place in designated waste container.
7) Field wash	Wash hands and face with soap and water as soon as possible and before eating, drinking, smoking, or other hand-to-mouth activity.

Handwashing and boot cleaning stations are to be available onsite. When work is completed, personnel shall thoroughly clean their hands with water and soap and rinse work boots/ clothing of any soil/ debris.

To ensure the decontamination waste is properly handled, the procedures noted in the table on the following page will be used to secure the wastes during breaks in the work:

Disposal Plan, End of Day	Waste containers will be sealed, labeled as to contents, and staged in a secure area.
Disposal Plan, End of Week	Waste containers will be sealed, labeled as to contents, and stored in a secure area.
Disposal Plan, End of Project	Material will be properly disposed under direction of the Project Manager/ General Contractor.

Waste containers containing discarded PPE, and the like will be disposed onsite in accordance with the regulations governing disposal of such materials, if at all possible. If such is not possible or is not allowed by waste disposal regulations, proper disposal will be arranged by the site Environmental Professional and/ or the appropriate person designated by the Project Manager/ Contractor.

Equipment/ materials that are used in contact with impacted soils/ groundwater shall be decontaminated by brushing the surfaces of the materials with a moderately stiff bristled brush and thoroughly washing/ wiping the equipment and rinsing it with water. In the event contaminants are present, trisodium phosphate (TSP) or Alconox solution and rinsing with clean water can be used to remove any bulk contaminants. A bucket and a brush can be used or for large items a minimal amount of water in conjunction with a power washer could be used.

Minimal amounts of water are to be used and care shall be taken to prevent buildup of water in the surface. We recommend the decontamination area contain a layer of gravel at the surface to prevent offsite tracking of soils. The gravel layer will also assist with preventing any puddling.

Contractors shall be responsible for the decontamination of their personnel and equipment and their specific procedures are to be identified in their company specific HASP, as modifications to the above procedures may be warranted. If large volumes of water are used in the decontamination process, they are to be containerized and property disposed of.

9) During demolition, mitigation of particulate inhalation will be managed by:
    a. Institution of dust minimization methods shall occur during intrusive activities if precipitation does not allow for adequate dust suppression, water or another pre-approved product could be artificially applied directly onto the ground surface and/ or concrete, etc. to mitigate potential particulate inhalation.
        1.) If particulate inhalation during aggregate transfer or grading cannot be reduced to acceptable levels, the material drop distance, vehicle speeds and/ or the size of the area being graded/ excavated could be reduced, which would further limit potential airborne particulates.
    b. If additional measures are required to further mitigate particulate inhalation, the use of respiratory protection equipment by workers during intrusive activities may be required, if activities creating airborne dusts that cannot be suppressed; and/ or
    c. The presence of excessive particulate may require air monitoring to be performed (completion of an exposure assessment (air monitoring)) for specific contaminants of concern that were identified by prior investigations and those that could be created by redevelopment activities, such as potential nuisance dust, etc., if potential dusts cannot be suppressed. The need to complete air monitoring is up to the Contractor and should be discussed with the site Environmental Professional/ General Contractor.

d. Debris, including particulates, is to be prevented from leaving the subject property, including being prevented from entering the stormwater drain/ basins, utility line or surface water/ wetlands. When working within proximity to these or similar features installation of an appropriate contaminant/ turbidity barrier, sock, etc. to contain potential debris may be required. It is the responsibility of those working onsite to ensure debris is contained and prevented from leaving the site.
e. Contractors are also required to adhere to the particulate inhalation measures established under the regulations/ guidance documents in Section 2.4, specifically, under Item #4.

Groundwater Response Activities:

1) Dewatering during demolition activities is not anticipated but could be required depending on encountered site conditions. In the event dewatering is required a permit is to be obtained through the City of Alpena Wastewater Treatment Plan or EGLE via a National Pollution Discharge Elimination System (NPDES) Permit. Until a permit is obtained, under no circumstances, shall groundwater from dewatering activities be discharged to any storm sewer, surface water body/ wetland, in the areas of known or suspected impact, or elsewhere on the subject property site without further evaluation and authorization through receipt of an appropriate permit. A permit will include details to whether pretreatment options are warranted, their specifics, and monitoring requirements to ensure the effectiveness of the system.
    a. If workers identify any suspicious factors (olfactory, visual, PID, or other suspected evidence of environmental impact) during dewatering, the General Contractor/ Project Manager and shall be contacted to determine appropriate precautions that may be required.
    b. Once a permit for dewatering is obtained, this ECMP will be revised or amended, if necessary, to provide at a minimum, details of the permitted discharge location, potential allowable flow rates, pretreatment options, if warranted, and monitoring requirements to ensure the effectiveness of the system.

2) No groundwater wells shall be installed at the site for drinking, washing, or other purposes. Water for drinking, decontamination, and any other use shall be provided by the municipal system, be purchased from a manufacturer in prepackaged containers, or come from a permitted source. Use of onsite groundwater is strictly prohibited. All water sources are to be pre-approved by the Contractor/ Project Manager prior to their use on the subject property. Consultation with an Environmental Professional may be warranted.

3) As part of the demolition phase, stormwater is anticipated to infiltrate into site soils until which time the redevelopment activities commence. Additionally, in areas of landscaping and in natural areas, percolation into site soils will also occur/ continue.

   No new stormwater management features shall be installed onsite without prior authorization from the Contractor/ Owner and through consultation with the site Civil engineer and Environmental Professional. New systems are to be designed to prevent exacerbation of impacts.

   It is likely that future activities at the site will require stormwater management features, design of the system(s) shall take into consideration the nature and location of contamination and shall not increase the infiltration of storm water through impacted areas or be installed in such a manner that would otherwise exacerbate contamination. All stormwater management design shall be completed by the Owners designated representative and permitted by the appropriate entity prior to their initiation. Consultation with an Environmental Professional shall also be completed.

4) Precautionary measures shall be implemented to eliminate the risk of erosion, runoff and non-natural infiltration. Site grading, stormwater controls and erosion protection measures shall be implemented to prevent contamination migration through precipitation runoff and erosion. At a minimum, site Soil Erosion and Sedimentation (SESC) Permit requirements shall be followed. Additional measures may be required due to site-specific conditions encountered; these measures may include covering areas of impact or stockpiled soils with poly sheeting coverings as a temporary control measure. Additional measures may also be required and the need for additional measures shall be evaluated on a case-by-case basis.

Other Response Activities:

1) No debris, including construction material, sediment, etc. shall be allowed to enter the Thunder Bay River. As the river immediately abuts the subject property, installation of netting/ and/ or a floating boom maybe required to catch any materials that may enter the river. Any materials that enter the river are to be immediately removed and all onsite work activities ceased until the removal is completed. The Contractor is required to appoint an onsite person to monitor the demolition activities and ensure materials do not enter the river from onsite.

2) Any imported material must be approved by the General Contractor and/ or Owner and verified to be non-environmentally impacted prior to being brought onsite. The site Environmental Professional may be consulted to determine the appropriate parameters for the determination.

3) In the locations of known or suspected environmental impact, the use of chemically compatible seals and gaskets may be warranted to protect infrastructure from potential infiltration of contaminants. Any seals or gaskets to be used should be preapproved by the site Civil Engineer, Contractor and/ or Owner prior to their installation.

4) If any USTs or other objects that are suspected to be associated with potential environmental contamination are discovered, the Contractor, Owner, and site Environmental Professional shall be notified immediately to determine what, if any, notifications to regulatory authorities are required and what appropriate management strategies may be required. In the event USTs or other suspect environmentally impacted objects are encountered, work in their vicinity shall immediately cease until an appropriate response is determined by the Contractor and/ or Owner.

5) SDS's for chemicals and materials for which there is the potential for exposure when completing onsite work shall be available at the subject property at all times. All contractors/ subcontractors and any other parties working on the subject property will be required to provide SDS's for all hazardous materials used or stored onsite during the performance of their work. Copies of all documentation should be maintained by the Contractor/ Construction Manager.

Qualifications/ Limitations:

1) The Hazard Communication Standard (1910.1200), requires workplaces to provide written information about the identities and hazards associated with the chemicals, must be available and understandable to workers. For potential third parties, people who would access the property during its redevelopment, the likelihood of exposure to contaminated media is likely but the Planned Response Activities outlined in Section 2.0 effectively address potential exacerbation issues. The use of this ECM/ DCP in conjunction with the site-specific HASP to be developed by each contractor/ subcontractor working onsite are intended meet the requirements of the Standard.

2) The Contractor/ Construction Manager/ Owner is responsible to maintain all necessary records related to the contents of this ECM/ DCP. The documentation to be maintained and should include at a minimum, records related to offsite transports and disposal of all materials, employee training records, and other documents related to the encountering and management of known or suspected contamination.

3) Potential environmental/ occupational hazards are present at the subject property and may vary from day to day and task to task. Details presented within this ECM/ DCP are related to the known impacts or potential impacts that are based on investigation activities completed to date. All site personnel shall be familiar with these potential hazards and take the appropriate precautions and steps necessary to mitigate potential risk from these hazards at all times. If a hazard arises that has not been identified in this ECM/ DCP, those that are not covered in the site-specific HASP, or are discussed during the onsite safety briefings, the Contractor/ Construction Manager and/ or their Project Safety Manager and the site Environmental Professional should be contacted immediately. If the hazard threatens the safety and health of onsite workers, others and/ or the environment, the Contractor/ Construction Manager and/ or their Project Safety Manager shall stop work immediately and contact the appropriate person(s) for consultation.

4) This ECM/ DCP is limited to potential due care responsibilities under Section 7a, Part 201, Act 451, P.A. 1994, as amended. This ECM/ DCP is also intended to provide guidance related to the impacted media including potentially, soil, groundwater, soil gas, ACMs, cadmium/ lead containing paints, universal wastes, and crystalline silica/ nuisance dusts. This Plan does not address any health and safety regulations, including but not limited to OHSA and MIOSHA regulations typical for construction/ demolition sites of a similar nature.

5) The contents of this document are provided only as an informational source. **Otwell Mawby, P.C. claims no responsibility for use of this document by others. Nothing in this compilation relieves employees, Contractors, and Subcontractors of the responsibility to provide a safe workplace for their employees and adjacent property occupants.** Each Contractor and Subcontractor must review this compilation and verify that its own hazard controls are sufficient for their specific site activities. If not sufficient, the Contractor and Subcontractors are responsible to supplement and communicate these controls to provide adequate protection as part of their own HASP. The guidelines and procedures contained herein are based on information available to Otwell Mawby as of the date of this writing. The contents of this document should be revised or amended when and if new information is received or conditions change significantly from original indications.

3.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

The signatures of the Environmental Professionals responsible for this ECM/ DCP are provided below. Please contact the undersigned with any questions or comments. We appreciate the opportunity to provide our services.

Sincerely,

OTWELL MAWBY, P.C.

James A. Jackson II
Senior Project Manager

Daniel B. Barton, P.E.
Project Engineer

The Otwell Mawby, P.C. company contact information for these Environmental Professionals is as follows:

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FIGURES

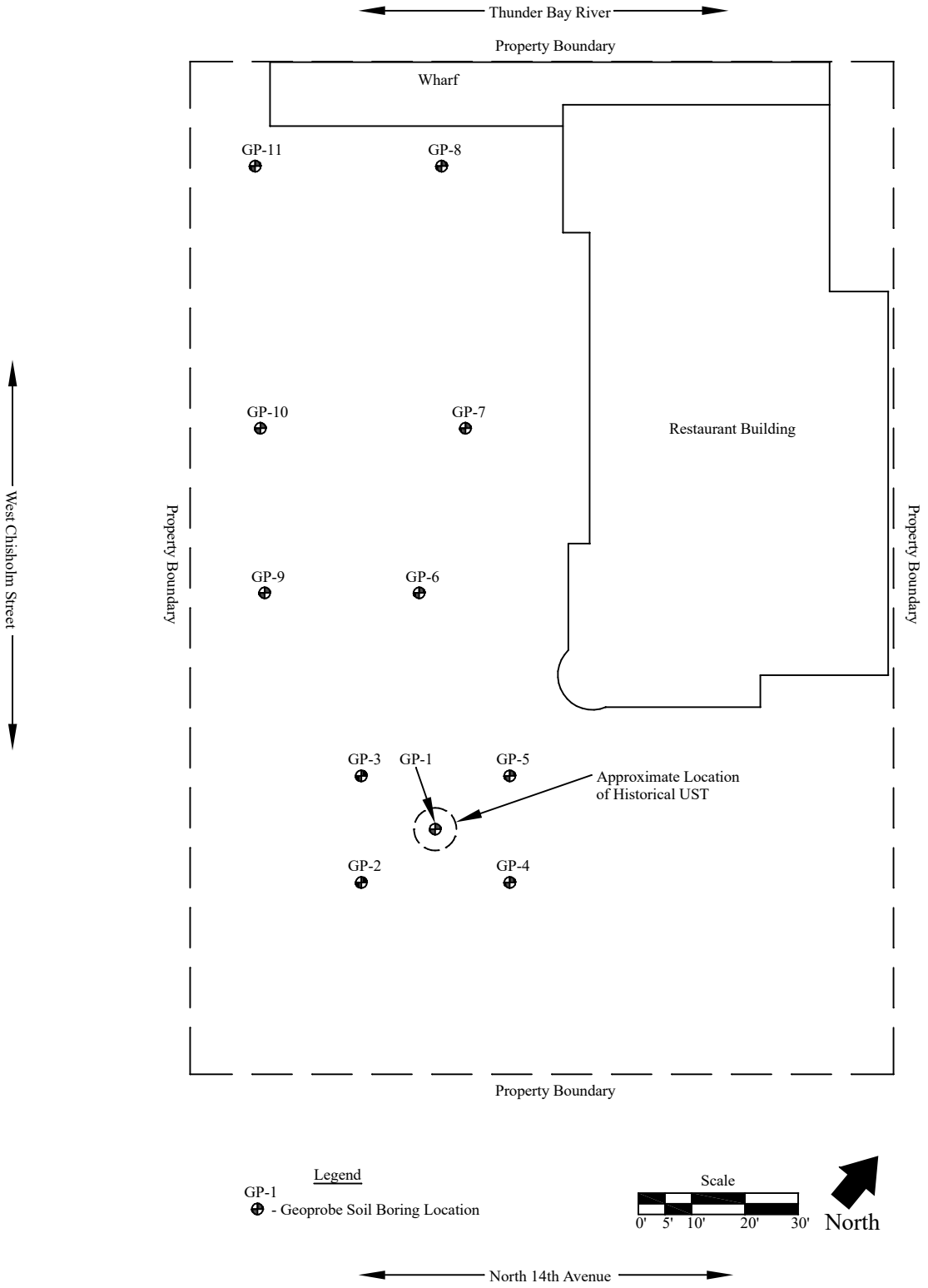
Figure 1 – Site Location Map

Figure 2 – Parcel Boundary Map

Figure 3 – Sample Locations Map

Former Alpena Big Boy Property **1315 West Chisholm Street Property** **City of Alpena, Alpena County MI** **Environmental Construction Mgt. & Due Care Plan**	**Figure 1:** **Site Location Map** -1971 Topographic Map		**NORTH**
Otwell Mawby, PC **Traverse City, Michigan**	**Project No:** **24-102E**	**Date:** **6/12/2025**	**Source:** **EDR**

Former Alpena Big Boy Property **1315 West Chisholm Street Property** **City of Alpena, Alpena County MI** **Environmental Construction Mgt. & Due Care Plan**	**Figure 2:** **Parcel Boundary Map** **NORTH**		
Otwell Mawby, PC **Traverse City, Michigan**	**Project No:** **24-102E**	**Date:** **6/12/2025**	**Source:** **Alpena Co. GIS**



Former Big Boy Property 1315 West Chrisholm Street City of Alpena, Alpena County, Michigan	Figure 3: Sample Locations Map		
Otwell Mawby, P.C. **Traverse City, Michigan**	**Date:** 11/4/2024	**Proj. No.:** 24-102E	**Scale:** 1" = 30'

TABLES

Table 1 – Soil Analytical Data Summary

Table 2 – Groundwater Analytical Data Summary

Table 1
Former Alpena Big Boy Property
1315 West Chisholm Street, Parcel ID#: 093-637-000-955-00
City of Alpena, Alpena County, Michigan
Otwell Mawby, P.C. Project Number: 24-102E
Soil Analytical Data Summary

Analyte - Metals	CAS #	EGLE Part 201 Statewide Default Background Level	EGLE Part 201 Drinking Water Protection Criteria	EGLE Part 201 Groundwater Surface Water Interface Protection Criteria	EGLE Part 201 Soil Volatilization to Indoor Air Inhalation Criteria	EGLE Part 201 Direct Contact Criteria	EGLE Residential Volatilization to Indoor Air Pathway (VIAP) Screening Levels - Soil	EGLE Nonresidential Volatilization to Indoor Air Pathway (VIAP) Screening Levels - Soil	GP-1 9.0' BGL 11/1/2024	GP-3 9.0' BGL 11/1/2024	GP-7 7.0' BGL 11/1/2024
Arsenic	7440382	5,800	4,600	4,600	NLV	7,600	NA	NA	NA	NA	1,000
Barium (B)	7440393	75,000	1.30E+06	G=2.9E+5,X	NLV	3.70E+07	NA	NA	NA	NA	18,100
Cadmium (B)	7440439	1,200	6,000	G=2,600,X	NLV	5.50E+05	NA	NA	NA	NA	ND
Chromium (B,H)	16065831	18,000	1.0E+9 (D)	G=2.1E+9,X	NLV	7.90E+08	NA	NA	NA	NA	2,510
Copper (B)	7440508	32,000	5.80E+06	G=52,000	NLV	2.00E+07	NA	NA	NA	NA	4,250
Lead (B)	7439921	21,000	7.00E+05	G=2.5E+6,M,X	NLV	4.00E+05	NA	NA	3,100	3,210	9,150
Mercury (B, Z)	Varies	130	1.70E+03	50 (M), 1.2	48,000	1.60E+05	22 (M) nc	790 nc	NA	NA	ND
Selenium (B)	7782492	410	4,000	400	NLV	2.60E+06	NA	NA	NA	NA	ND
Silver (B)	7440224	1,000	4,500	100 (M); 27	NLV	2.50E+06	NA	NA	NA	NA	ND
Zinc (B)	7440666	47,000	2.40E+06	G=120,000	NLV	1.70E+08	NA	NA	NA	NA	32,300
Other Metals	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	NA	NA	NA
Analyte -PNAs											
Acenaphthene	83329	NA	3.00E+05	8,700	190,000,000	41,000,000	2.0E+05 nc	7.2E+06 nc	NA	NA	517
Acenaphthylene	208968	NA	5.90E+03	ID	1,600,000	1,600,000	DATA	DATA	NA	NA	2,260
Anthracene	120127	NA	4.10E+04	ID	1.0E+09 (D)	230,000,000	1.3E+07 nc	4.4E+08 nc	NA	NA	2,340
Benzo(a)anthracene (Q)	56553	NA	NLL	NLL	NLV	20,000	1.6E+05 (MM) mut	2.2E+07 ca	NA	NA	4,300
Benzo(a)pyrene (Q)	50328	NA	NLL	NLL	NLV	**2.00E+03**	NA	NA	NA	NA	**4,630**
Benzo(b)fluoranthene (Q)	205992	NA	NLL	NLL	ID	2.00E+04	NA	NA	NA	NA	5,090
Benzo(g,h,i)perylene (Q)	191242	NA	NLL	NLL	NLV	2.50E+06	NA	NA	NA	NA	2,270
Benzo(k)fluoranthene (Q)	207089	NA	NLL	NLL	NLV	2.00E+05	NA	NA	NA	NA	1,660
Chrysene (Q)	218019	NA	NLL	NLL	ID	2.00E+06	NA	NA	NA	NA	3,610
Dibenzo(a,h)anthracene (Q)	53703	NA	NLL	NLL	NLV	2.00E+03	NA	NA	NA	NA	550
Fluoranthene	206440	NA	7.30E+05	**5,500**	1.0E+9 (D)	4.60E+07	NA	NA	NA	NA	**10,400**
Fluorene	86737	NA	3.90E+05	5,300	580,000,000	2.70E+07	4.7E+05 nc	1.7E+07 nc	NA	NA	2,060
Indeno(1,2,3-cd)pyrene (Q)	193395	NA	NLL	NLL	NLV	20,000	NA	NA	NA	NA	2,870
2-Methylnaphthalene	91576	NA	5.70E+04	4,200	2,700,000	8,100,000	**1,700 nc**	60,000 nc	NA	NA	**1,710**
Naphthalene	91203	NA	3.50E+04	**730**	250,000	16,000,000	**67 (M) ca**	3,800 ca	NA	NA	**3,730**
Phenanthrene	85018	NA	5.60E+04	**2.10E+03**	2.80E+06	1.60E+06	**1,700 nc**	58,000 nc	NA	NA	**12,100**
Pyrene	129000	NA	4.80E+05	ID	1.0E+9 (D)	2.90E+07	2.5E+07 nc	8.8E+08 nc	NA	NA	7,420
Other PNAs	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	NA	NA	ND
Analyte - VOCs											
Acetone (I)	67641	NA	15,000	34,000	2.9E+8 (C)	2.30E+07	2.6E+05 (EE) st	3.1E+06 (EE) st	NA	NA	ND
Benzene (I)	71432	NA	100	4,000 (X)	1,600	1.80E+05	1.7 (M) ca	94 ca	ND	ND	ND
1,2,3-Trimethylbenzene (I)	526738	NA	NC	NC	NC	NC	270 (JT) nc	9,600 (JT) nc	ND	ND	ND
1,2,4-Trimethylbenzene (I)	95636	NA	2,100	570	4.3E+6 (C)	3.2E+7 C	150 (JT) nc	6,100 (JT) nc	ND	ND	ND
1,2-Dichlorobenzene	106467	NA	14,000	280	1.1E+7 (C)	19,000,000 C	1,500 nc	52,000 nc	NA	NA	ND
1,3,5-Trimethylbenzene (I)	108678	NA	1,800	1,100	2.6E+6 (C)	3.2E+7 C	100 (JT) nc	3,600 (JT) nc	ND	ND	ND
n-Butylbenzene	104518	NA	1,600	ID	ID	2.50E+06	550 nc	20,000 nc	NA	NA	ND
sec-butylbenzene	135988	NA	1,600	ID	ID	2.50E+06	3,800 nc	1.3E+05 (C) nc (49,000)	NA	NA	ND
Cyclohexane	108941	NA	5.20E+06	NA	17,000	1.0E+9 (C,D)	320 (M) nc	11,000 nc	NA	NA	ND
1,3-Dichlorobenzene	541731	NA	170	680	79,000	200,000 C	10 (M) nc	360 nc	NA	NA	ND
1,4-Dichlorobenzene	106467	NA	1,700	360	77,000	4.00E+05	23 (M) ca	1,300 nc	NA	NA	ND
Ethylbenzene (I)	100414	NA	1,500	360	87,000	2.2E+7 C	12 (M) ca	680 ca	ND	ND	ND
Hexane	110543	NA	1.8E+5 (C)	NA	5.1E+5 (C)	9.2E+7 (C)	25 nc	890 nc	NA	NA	ND
n-Heptane	142825	NA	4.6E+7 (C)	NA	1.5E+6 (C)	9.9E+8 (C)	130 nc	4,600 nc	NA	NA	ND
Isopropyl benzene	98828	NA	91,000	3,200	4.0E+5 (C)	2.5E+7 C	3.8 (M) ca	210 (M) ca	NA	NA	ND
Isopropy toluene	99876	NA	NC	NC	NC	NC	NSL	NSL	NA	NA	ND
2-Methylnaphthalene	91576	NA	5.70E+04	4,200	2,700,000	8,100,000	1,700 nc	60,000 nc	ND	ND	ND
n-Propylbenzene (I)	103651	NA	1.60E+03	ID	ID	2,500,000	1,800 (DD) dev	21,000 (DD) dev	NA	NA	ND
Tetrachloroethene	127184	NA	100	1,200 (X)	11,000	2.0E+5 C	6.2 (M) (EE) st	150 (EE) st	NA	NA	ND
Naphthalene	91203	NA	3.50E+04	730	250,000	16,000,000	67 (M) ca	3,800 ca	ND	ND	ND
Toluene (I)	108883	NA	16,000	5,400	3.3E+5 (C)	5.0E+7 C	3,700 nc	64,000 (EE) st	ND	ND	ND
Xylene (total, I)	1330207	NA	5,600	820	6.3E+6 (C)	4.1E+8 C	280 (J) nc	9,900 (J) nc	ND	ND	ND
m,p-Xylene (I)	1330207	NA	5,600	820	6.3E+6 (C)	4.1E+8 C	280 (J) nc	9,900 (J) nc	ND	ND	ND
o-Xylene (I)	1330207	NA	5,600	820	6.3E+6 (C)	4.1E+8 C	280 (J) nc	9,900 (J) nc	ND	ND	ND
Other VOCs	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	ND*	ND*	ND

*Sample analyzed for leaded gasoline parameters, which includes select VOC parameters.

Notes:

Results compared to EGLE Generic Cleanup Criteria, October 12, 2023 and Volatilization to Indoor Air Pathway (VIAP) Screening Levels, Sept. 4, 2020 (Revised Feb. 2024)

ND = Not Detected

ID = Insufficient Data

NA = Not Applicable or Not Analyzed

NC = No Criteria

ca = Carcinogenetic

mut = Mutagenic cancer

st = Short-term (i.e., less than chronic exposure).

nc = Non-Carcinogenetic

dev = Developmental

= GCC and/ or VIAP Screeening Level Exceedance

BOLD Font without shading indicates an exceedence of the Statewide Default Background Level.

All results shown in parts per billion (ug/Kg)

NLL= Hazardous substance not likely to leach under most soil conditions.

NLV= Hazardous substance is not likely to volatilize under most conditions.

NSL= No Screening Level established

DATA = Insufficient physical chemical parameters to calculate a VIAP screening level for specified media. If detections are present in specified media, health-based soil vapor value should be used to evaluate risk.

B = Background, as defined in R 299.1(b), may be substituted if higher than the calculated cleanup criterion. Background levels may be less than criteria for some inorganic compounds.

C = The VIAP screening level exceeds the chemical-specific soil saturation screening level (Csat). Because this table does not list Csat values both were provided, with the calculated (health-based) value listed first and Csat provided in parenthesis. The person proposing or implementing response activity must document whether additional response activity is required to control non aqueous phase liquid (NAPL) to protect against risks associated with NAPL by using methods approvable for the NAPL present.

D = Calculated criterion exceeds 100 percent; hence it is reduced to 100 percent or 1.0E+9 parts per billion (ppb).

DD = Hazardous substance causes developmental effects. Residential VIAP screening levels are protective of both prenatal exposure using a pregnant female receptor and postnatal exposure using a child receptor. Nonresidential VIAP screening levels are protective of prenatal exposure using a pregnant female receptor. Prenatal developmental effects may occur after an acute (i.e. shortterm) or full-term exposure.

EE = The acceptable air concentration (AAC) for the volatile hazardous substances is not derived using standard equations. The hazardous substance may cause adverse human health effects for less than chronic exposures (i.e. short-term or acute). The AAC for these hazardous substances is the acute or intermediate minimum risk level (MRL) developed by the Agency for Toxic Substances and Disease Registry (ATSDR), a United States Environmental Protection Agency Integrated Risk Information System (IRIS) acute reference concentration, or an acute initial threshold screening level (ITSL) by the EGLE's Air Quality Division.

G = Groundwater surface water interface (GSI) criterion dependes on the pH or water hardness, or both, of the receiving surface water. 100 mg used for hardness

H = Valence-specific chromium data (Cr III and Cr VI) shall be compared to the corresponding valence-specific cleanup criteria. If both Cr III and Cr VI are present in groundwater, the total concentration of both cannot exceed the drinking water criterion of 100 ug/L. If analytical data are provided for total chromium only, they shall be compared to the cleanup criteria for Cr VI. Cr III soil cleanup criterion for protection of drinking water can only be used at sites where groundwater is prevented from being used as a public water supply, currently and in the future, through an approved land or resource use restriction.

I = Hazardous substance may exhibit the characteristic of ignitability as defined in 40 C.F.R. §261.21 (revised as of July 1, 2001), which is adopted by reference in these rules and is available for inspection at EGLE, 525 West Allegan Street, Lansing, Michigan. Copies of the regulation may be purchased, at a cost as of the time of adoption of these rules of $45, from the Superintendent of Documents, Government Printing Office, Washington, DC 20401 (stock number 869-044- 00155-1), or from EGLE, Remediation and Redevelopment Division (RRD), 525 West Allegan Street, Lansing, Michigan 48933, at cost.

J = Hazardous substance may be present in several isomer forms. Isomer-specific concentrations must be added together for comparison to criteria.

JT = Hazardous substance may be present in several isomer forms. The VIAP screening level may be used for the individual isomer provided that it is the sole isomer detected; however, when multiple isomers are detected in a medium, the isomer-specific concentrations must be added together and compared to the most restrictive VIAP screening level of the detected isomers.

M = The VIAP screening level may be below target detection limits (TDL). In accordance with Sec. 20120a(10) when the TDL for a hazardous substance is greater than the developed VIAP screening level, the TDL is used to evaluate the risk posed from the pathway.

MM = Hazardous substance is a carcinogen with a mutagenic mode of action. The cancer potency values used in calculating VIAP screening levels are modified using age-dependent adjustment factors for those carcinogenic chemicals identified as mutagenic.

Q = Criteria for carcinogenic polycyclic aromatic hydrocarbons were developed using relative potential potencies to benzo(a)pyrene.

X = The groundwater surface water interface (GSI) criterion shown in the generic cleanup criteria tables is not protective for surface water that is used as a drinking water source.

Z = Mercury is typically measured as total mercury. The generic cleanup criteria, however, are based on data for different species of mercury. Specifically, data for elemental mercury, chemical abstract service (CAS) number 7439976, serve as the basis for the soil volatilization to indoor air criteria, groundwater volatilization to indoor air, and soil inhalation criteria. Data for methyl mercury, CAS number 22967926, serve as the basis for the GSI criterion; and data for mercuric chloride, CAS number 7487947, serve as the basis for the drinking water, groundwater contact, soil direct contact, and the groundwater protection criteria. Comparison to criteria shall be based on species-specific analytical data only if sufficient facility characterization has been conducted to rule out the presence of other species of mercury.

Table 2
Former Alpena Big Boy Property
1315 West Chisholm Street, Parcel ID#: 093-637-000-955-00
City of Alpena, Alpena County, Michigan
Otwell Mawby, P.C. Project Number: 24-102E
Groundwater Analytical Data Summary

Analyte - PNAs	CAS #	EGLE Part 201 Residential Drinking Water Criteria	EGLE Part 201 Groundwater Surface Water Interface Criteria	EGLE Residential Volatalization to Indoor Air Pathway (VIAP) Screening Levels - Shallow Groundwater	EGLE Nonresidential Volatalization to Indoor Air Pathway (VIAP) Screening Levels - Shallow Groundwater	GP-3 11/1/2024	GP-8 11/1/2024	GP-9 11/1/2024
2-Methylnaphthalene	91576	260	19	66 nc	230 ca	NA	ND	2.52
Acenaphthene	83329	1,300	38	3,900 (S) sol	3,900 (S) sol	NA	ND	2.60
Acenaphthylene	208968	52	ID	65 nc	1,400 nc	NA	ND	0.504
Naphthalene	91203	520	11	4.2 (M) ca	23 ca	NA	ND	ND
Fluorene	86737	880	12	1,700 (S) sol	1,700 (S) sol	NA	ND	3.38
Phenanthrene	85018	52	2.0 (M); 1.7	9.5 nc	29 nc	NA	ND	ND
Other PNAs	Varies	Varies	Varies	Varies	Varies	NA	ND	ND
Analyte - VOCs								
Benzene (I)	71432	5.0 (A)	200 X	1.0 ca	17 ca	ND	ND	ND
Ethylbenzene (I)	101414	74 (E)	18	2.8 ca	56 ca	ND	ND	ND
Dichlorodifluoromethane	75718	1,700	ID	13 nc	820 ca	ND	ND	ND
Tetrachloroethene	127184	5.0 (A)	60 (X)	1.5 (FF) st	70 (FF) st	ND	ND	ND
Trichlorofluoromethene	75694	2,600	NA	22 nc	1,100 nc	ND	ND	ND
1,2,4-Trimethylbenzene (I)	95636	63 (E)	17	25 (JT) nc	240 (JT) nc	ND	ND	5.36
1,3,5-Trimethylbenzene (I)	108678	72 (E)	45	18 (JT) nc	220 (JT) nc	ND	ND	2.33
2-Methylnaphthalene	91576	260	19	66 nc	230 ca	ND	ND	9.65
n-Butylbenzene	104518	80	ID	44 nc	720 nc	ND	ND	ND
sec-Butylbenzene	135988	80	ID	270 nc	790 nc	ND	ND	ND
Isopropylbenzene	98828	800	28	**0.60 (M)**	13 ca	ND	ND	**1.5**
Isopropyltoluene	99876	NC	NC	NSL	NSL	ND	ND	ND
n-Propylbenzene (I)	103651	80	ID	43 (DD) dev	970 (DD) dev	ND	ND	ND
Toluene (I)	108883	790 E	270	300 (FF) st	6,600 (FF) st	ND	ND	ND
m,p-Xylene (I)	1330207	280 (E)	49	75 (J) nc	810 (J) nc	ND	ND	ND
Xylene (total, I)	1330207	280 (E)	49	75 (J) nc	810 (J) nc	ND	ND	ND
Other VOCs	Varies	Varies	Varies	Varies	Varies	ND	ND	ND
Analyte - Metals								
Arsenic	7440382	10 (A)	10	NA	NA	NA	ND	NA
Barium (B)	7440393	2,000 (A)	G=440	NA	NA	NA	24.5	NA
Cadmium (B)	7440439	5.0 (A)	G=2.2, X	NA	NA	NA	ND	NA
Chromium (B,H)	16065831	100 (A)	G=74, X	NA	NA	NA	ND	NA
Copper (B)	7440508	1,000 (E)	G=9	NA	NA	NA	ND	NA
Lead (B)	7439921	4.0 (L)	G=14, X	NA	NA	ND	ND	NA
Mercury ((Total, B,Z)	Varies	2.0 (A)	0.0013	8.8E-02 nc	0.30 nc	NA	ND	NA
Selenium (B)	7782492	50 (A)	5	NA	NA	NA	ND	NA
Silver (B)	7440224	34	0.2 (M); 0.06	NA	NA	NA	ND	NA
Zinc (B)	7440666	2,400	G=120	NA	NA	NA	21.5	NA
Other Metals	Varies	Varies	Varies	Varies	Varies	NA	NA	NA

Notes:

Results compared to EGLE Generic Cleanup Criteria, October 12, 2023 and the EGLE Volatilization to Indoor Air Pathway (VIAP) Screening Levels, Revised Feb. 2024

* = The shallow groundwater VIAP Screening Levels apply when the depth to first encountered groundwater is 10 feet below ground surface or less.

NA = Not Analyzed, Applicable or Available

nc = Non-Carcinogenetic

= GCC and/ or VIAP Exceedence

ND = Not Detected

All results shown in parts per billion (ug/L)

NSL = No Screening Level established

ID = Insufficient data

ca = Carcinogenetic

dev = Developmental

st = Short-term (i.e., less than chronic exposure).

A = Criterion is the State of Michigan drinking water standard.

B = Background, as defined in R 299.1(b), may be substituted if higher than the calculated cleanup criterion. Background levels may be less than criteria for some organic compounds.

DD = Hazardous substance causes developmental effects. Residential VIAP screening levels are protective of both prenatal exposure using a pregnant female receptor and postnatal exposure using a child receptor. Nonresidential VIAP screening levels are protective of prenatal exposure using a pregnant female receptor. Prenatal developmental effects may occur after an acute (i.e. shortterm) or full-term exposure.

E = Criterion is aesthetic drinking water value.

FF = The AAC for the volatile hazardous substances are based on toxicity values that have been identified to have the potential to cause adverse human health effects for less than chronic exposures (i.e. short-term or acute). The short-term exposure for shallow groundwater VIAP screening levels are based on modification of the standard equations by the department to develop applicable shallow groundwater VIAP screening levels.

H = Valence-specific chromium data (Cr III and Cr VI) shall be compared to the corresponding valence-specific cleanup criteria. If both Cr III and Cr VI are present in groundwater, the total concentration of both cannot exceed the drinking water criterion of 100 ug/L. If analytical data are provided for total chromium only, they shall be compared to the cleanup criteria for Cr VI. Cr III soil cleanup criterion for protection of drinking water can only be used at sites where groundwater is prevented from being used as a public water supply, currently and in the future, through an approved land or resource use restriction.

G = Groundwater surface water interface (GSI) criterion dependes on the pH or water hardness, or both, of the receiving surface water. 100 mg used for hardness value. GSI Criteria for Surface Water Protected for Drinking Water Use shown in table above.

I = Hazardous substance may exhibit the characteristic of ignitability as defined in 40 C.F.R. §261.21 (revised as of July 1, 2001), which is adopted by reference in these rules and is available for inspection at EGLE, 525 West Allegan Street, Lansing, Michigan.

J = Hazardous substance may be present in several isomer forms. Isomer-specific concentrations must be added together for comparison to criteria.

JT = Hazardous substance may be present in several isomer forms. The VIAP screening level may be used for the individual isomer provided that it is the sole isomer detected; however, when multiple isomers are detected in a medium, the isomer-specific concentrations must be added together and compared to the most restrictive VIAP screening level of the detected isomers.

L = Criteria for lead are derived using a biologically based model, as allowed for under Section 20120a(9) of the NREPA and are not calculated using the algorithms and assumptions specified in pathway-specific rules. The generic residential drinking water criterion of 4 ug/L is linked to the generic residential soil direct contact criterion of 400 mg/kg. A higher concentration in the drinking water, up to the state action level of 15 ug/L, may be allowed as a site-specific remedy and still allow for drinking water use, under Section 20120a(2) and 20120b of the NREPA if soil concentrations are appropriately lower than 400 mg/kg. If a sitespecific criterion is approved based on this subdivision, a notice shall be filed on the deed for all property where the groundwater concentrations will exceed 4 ug/L to provide notice of the potential for unacceptable risk if soil or groundwater concentrations increase.

M = The VIAP screening level may be below target detection limits (TDL). In accordance with Sec. 20120a(10) when the TDL for a hazardous substance is greater than the developed VIAP screening level, the TDL is used to evaluate the risk posed from the pathway.

S = Footnote S: Calculated VIAP screening level exceeds the hazardous substance-specific water solubility limit; therefore, the water solubility limit is used to evaluate the risk posed from the pathway. When this occurs the basis for the screening level is noted as "sol".

X = The groundwater surface water interface (GSI) criterion shown in the generic cleanup criteria tables is not protective for surface water that is used as a drinking water source.

Z =Mercury is typically measured as total mercury. The generic cleanup criteria, however, are based on data for different species of mercury. Specifically, data for elemental mercury, chemical abstract service (CAS) number 7439976, serve as the basis for the soil volatilization to indoor air criteria, groundwater volatilization to indoor air, and soil inhalation criteria. Data for methyl mercury, CAS number 22967926, serve as the basis for the GSI criterion; and data for mercuric chloride, CAS number 7487947, serve as the basis for the drinking water, groundwater contact, soil direct contact, and the groundwater protection criteria. Comparison to criteria shall be based on species-specific analytical data only if sufficient facility characterization has been conducted to rule out the presence of other species of mercury.

APPENDICES

Appendix A – Conceptual Site Redevelopment Plans

Appendix B – Asbestos Inspection Report

Appendix C – Hazardous Material and Universal Waste Inspection Report

Appendix D – Asbestos and Universal Waste Visual Clearance Report

APPENDIX A

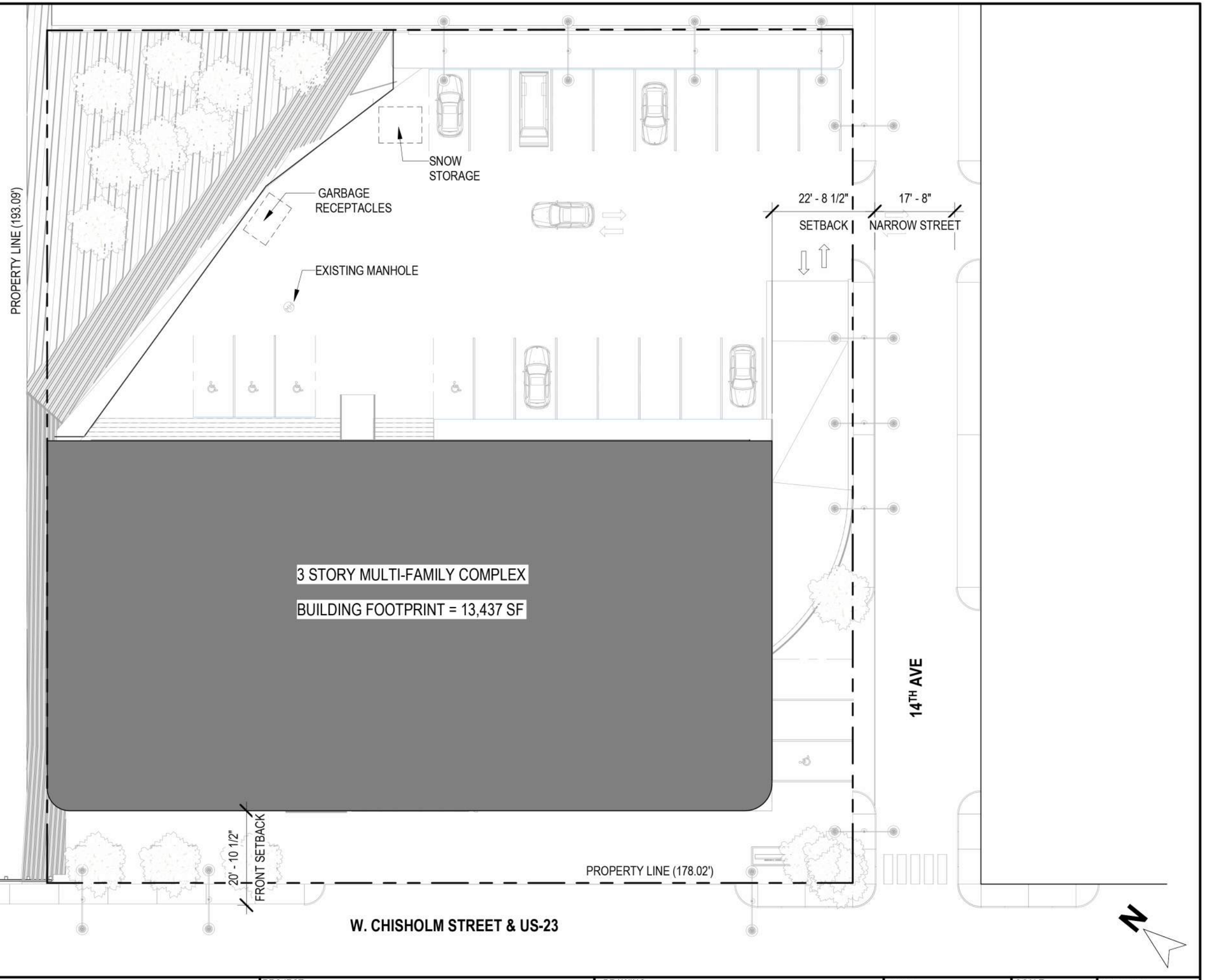
Conceptual Site Redevelopment Plans

SUNSET AURORA

SUNSET AURORA is a thoughtfully designed mixed-use residential building, blending contemporary living with vibrant commercial and leisure spaces. The development features **18** modern apartments, offering a mix of one- and two-bedroom units.

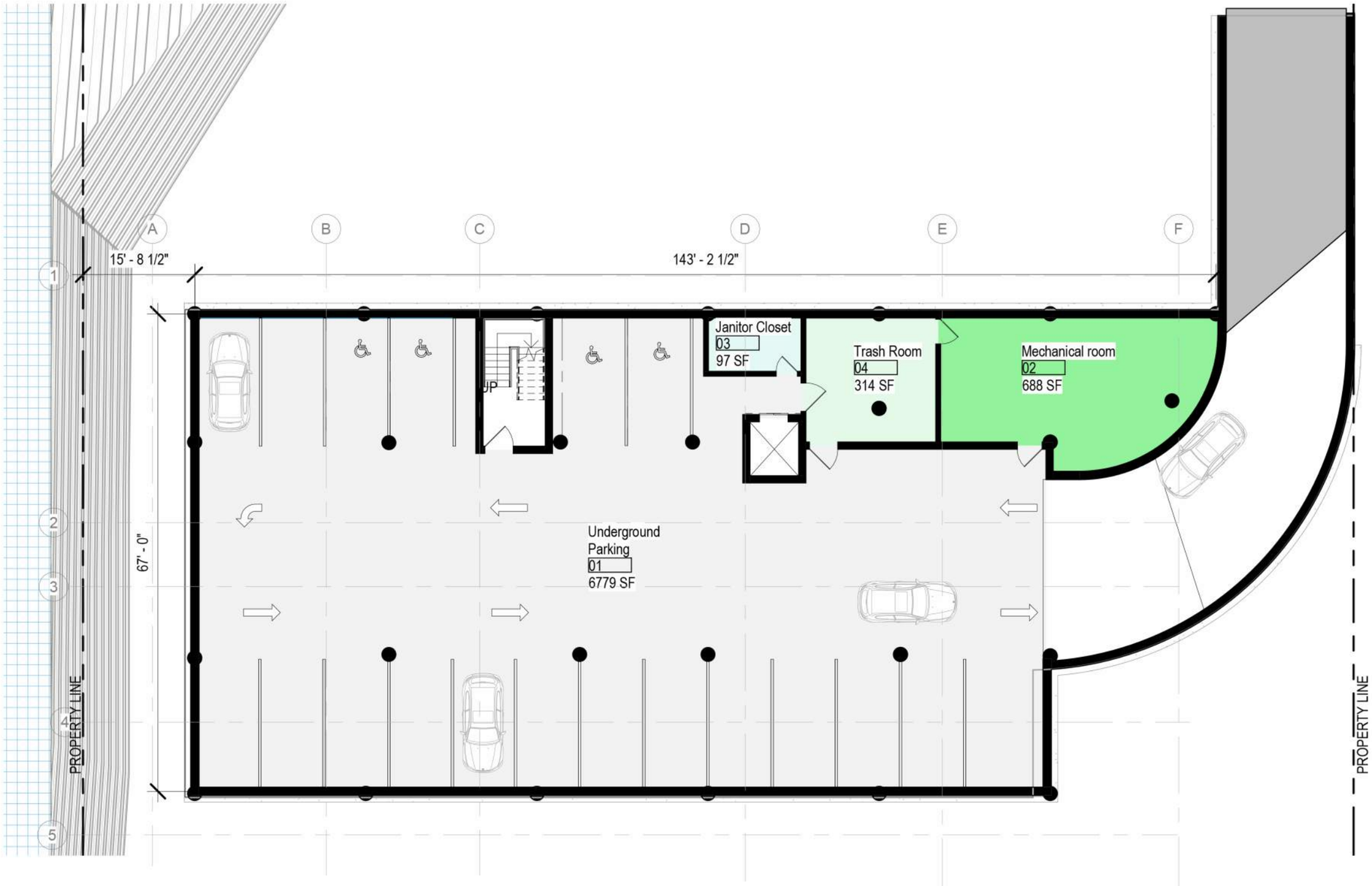
The lowest level houses **19** parking spaces, while the ground floor provides an additional **24**, totaling **43** parking spaces for residents and visitors. At the heart of the building, the lobby opens to six retail storefronts, spanning approximately **3,370 square feet**, enhancing the pedestrian experience with diverse shopping and service options.

A riverfront restaurant with outdoor seating offers a welcoming dining experience with scenic views, while a three-story café serves as a lively social hub for both residents and the community. Additionally, rooftop access is exclusively available for residents and their guests, providing a private outdoor retreat with panoramic views.



EARTH FIRST CONSULTING

PROJECT	PROJECT	DRAWING	DATE	SCALE	SHEET NO.
SUNSET AURORA	1315 W Chisholm St Alpena, MI	SITE PLAN	03.04.2025	3/64" = 1'-0"	TF-00



EARTH FIRST CONSULTING

PROJECT	PROJECT	DRAWING	DATE	SCALE	SHEET NO.
SUNSET AURORA	1315 W Chisholm St Alpena, MI	BASEMENT LEVEL	03.04.2025	1/16" = 1'-0"	TF-01

SNOW STORAGE

GARBAGE RECEPTACLES

UP

A B C D E F

1 2 3 4 5

Package Room
012
96 SF

FOOD SHOP
06
766 SF

UP

Concierge

Men's RM

Women's RM

Shop 02
10
502 SF

Shop 03
07
516 SF

6'9" UNDERSIDE

RESTAURANT / CAFE / LOBBY
011
4461 SF

FOUNTAIN

OPEN ABOVE

KITCHEN
29
216 SF

CAFE

UP

Shop 04
08
506 SF

Shop 05
09
505 SF

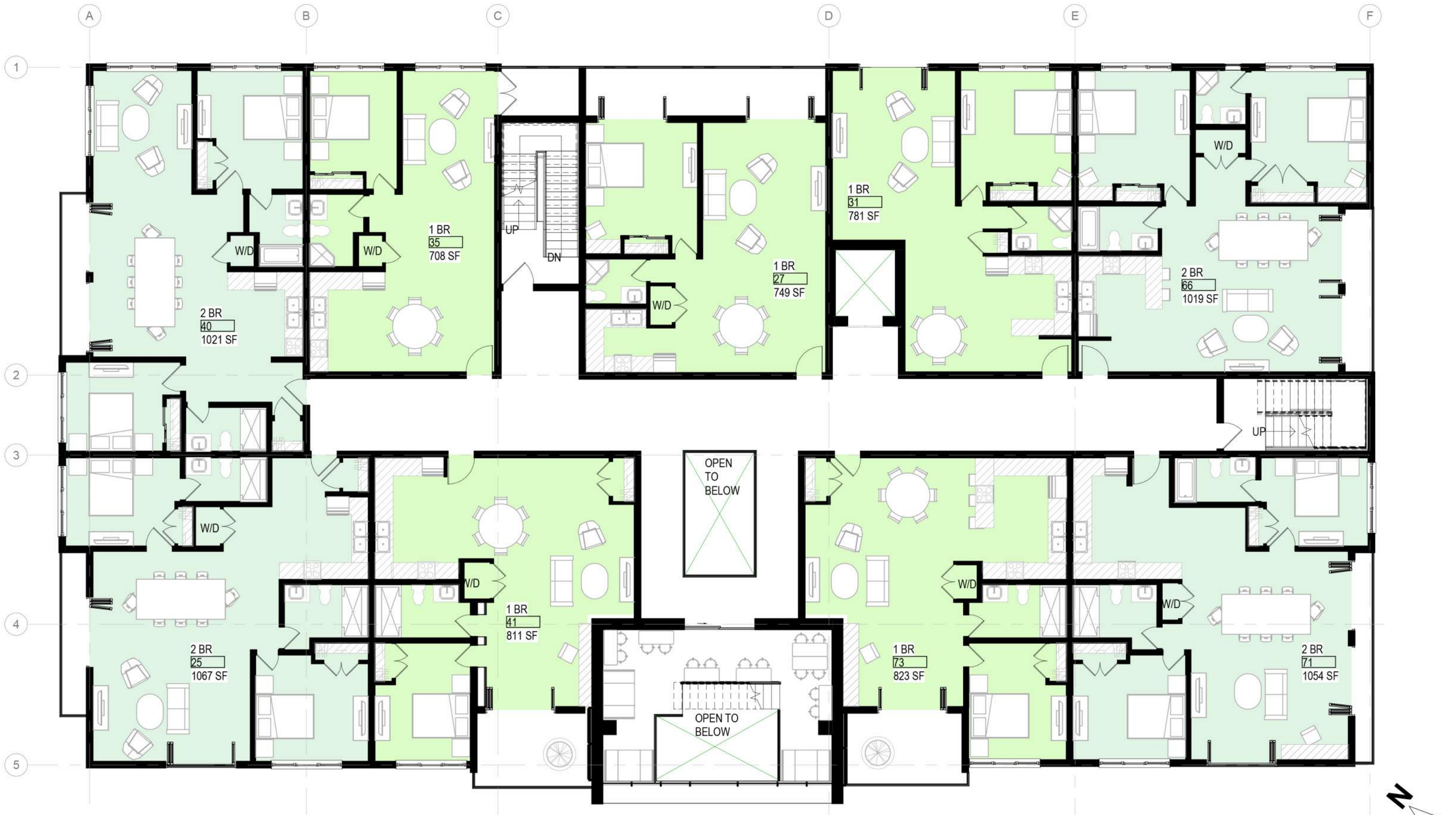
Shop 01
05
609 SF

DN

N

EARTH FIRST CONSULTING

PROJECT	PROJECT	DRAWING	DATE	SCALE	SHEET NO.
SUNSET AURORA	1315 W Chisholm St Alpena, MI	GROUND FLOOR	03.04.2025	1" = 20'-0"	TF-02

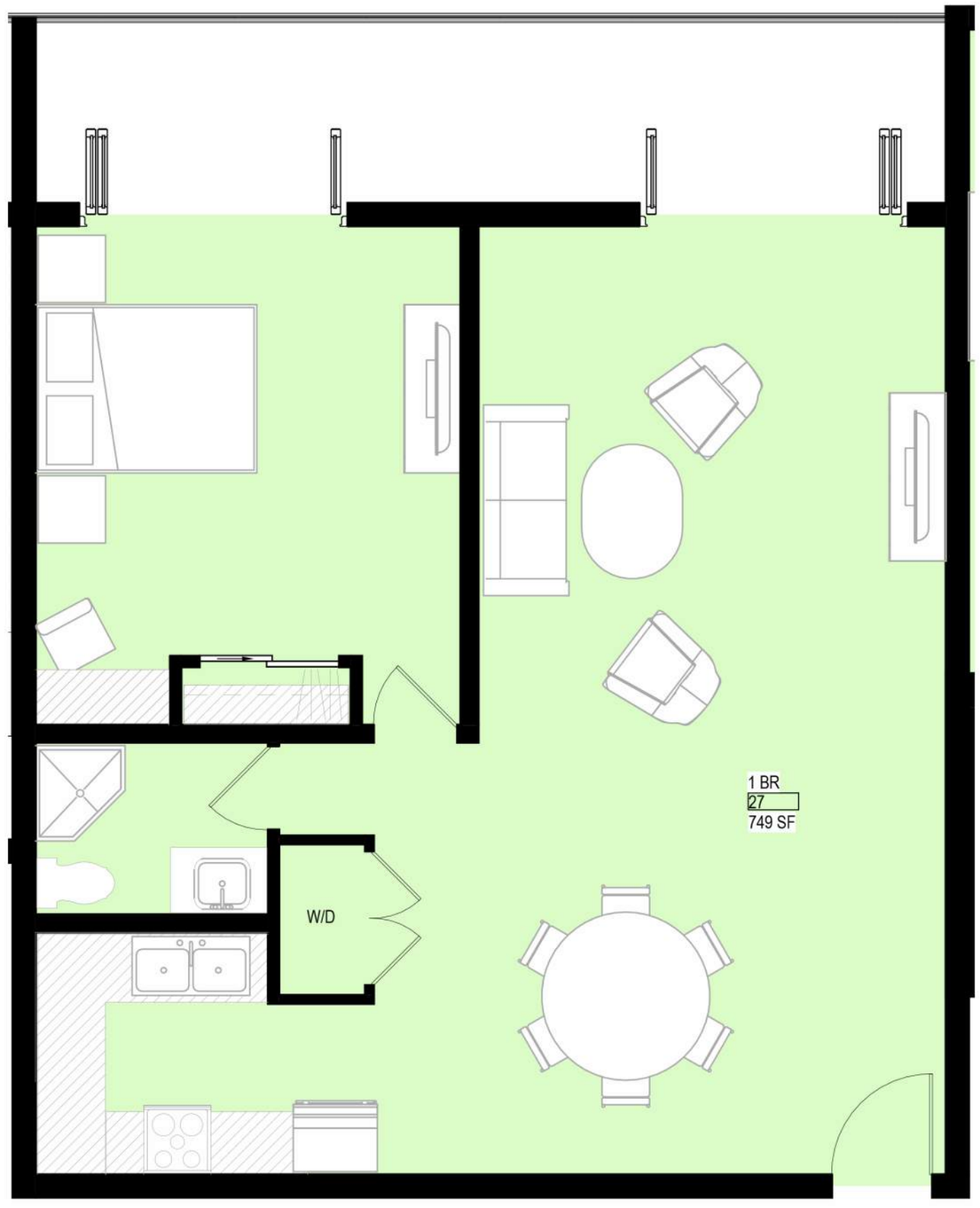


EARTH FIRST CONSULTING

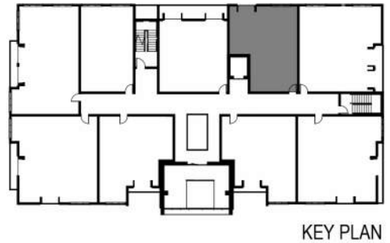
PROJECT	PROJECT	DRAWING	DATE	SCALE	SHEET NO.
SUNSET AURORA	1315 W Chisholm St Alpena, MI	TYPICAL FLOOR PLAN	03.04.2025	1" = 10'-0"	TF-03

EARTH FIRST CONSULTING

PROJECT	PROJECT	DRAWING	DATE	SCALE	SHEET NO.
SUNSET AURORA	1315 W Chisholm St Alpena, MI	DIMENSIONED FLOOR PLAN	03.04.2025	1" = 10'-0"	TF-04



1 ENLARGED 1 BR
1/4" = 1'-0"

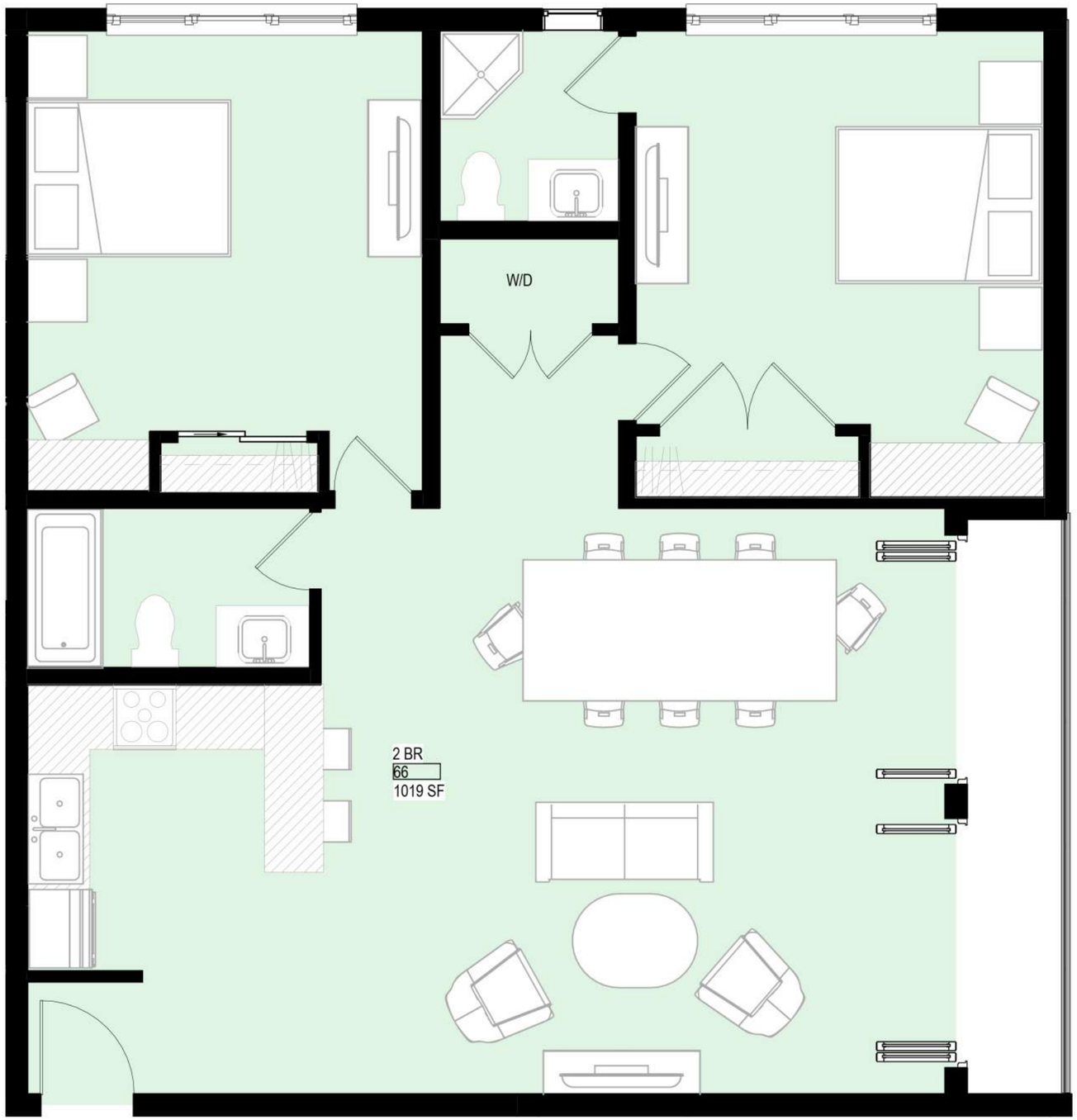


KEY PLAN

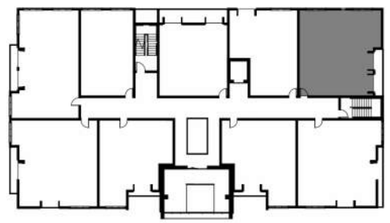
N

EARTH FIRST CONSULTING

PROJECT	PROJECT	DRAWING	DATE	SCALE	SHEET NO.
SUNSET AURORA	1315 W Chisholm St Alpena, MI	ENLARGED 1 BR	03.04.2025	As indicated	TF-05



1 ENLARGED 2 BR
1/4" = 1'-0"



KEY PLAN

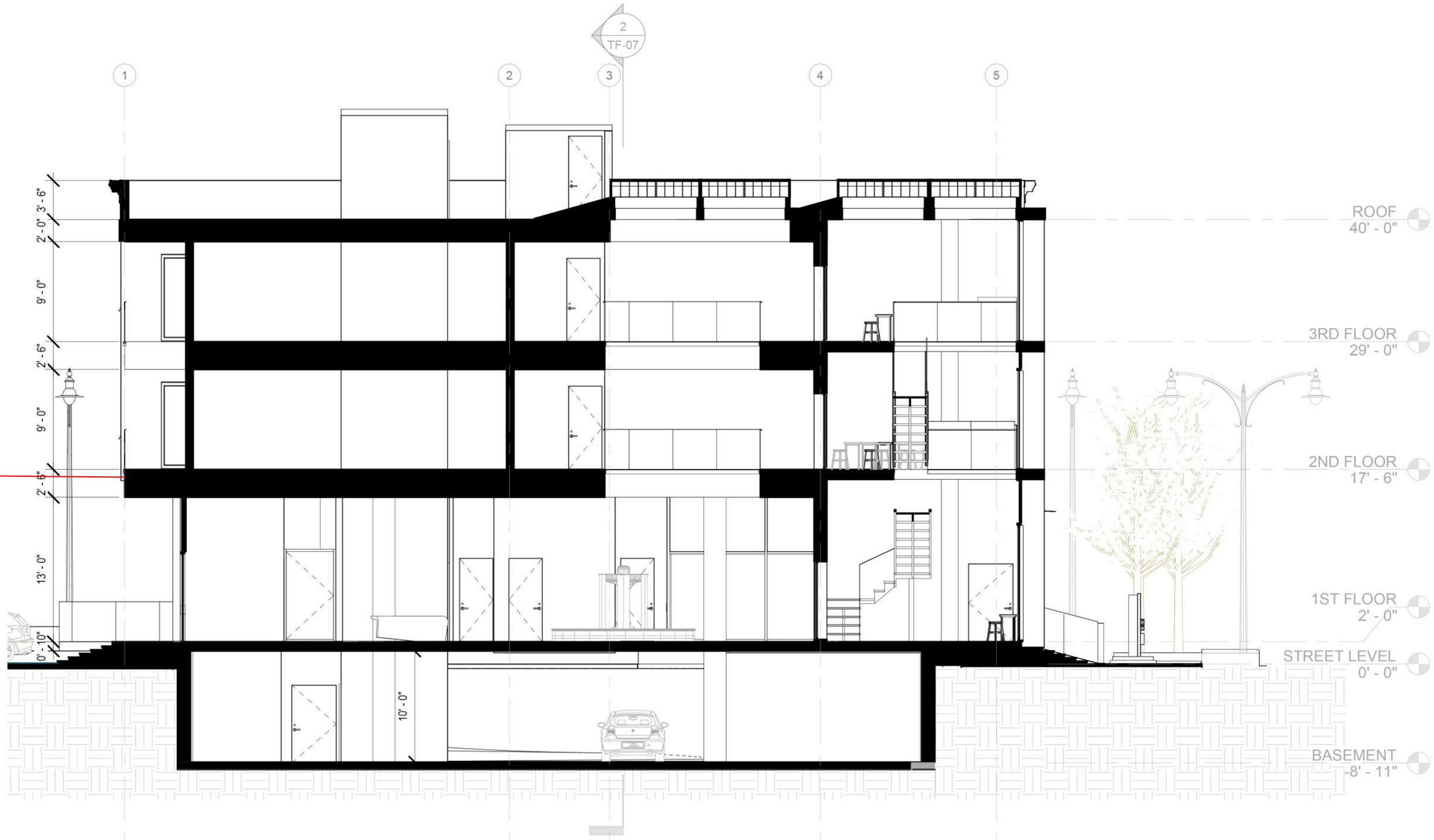
N

EARTH FIRST CONSULTING

PROJECT	PROJECT	DRAWING	DATE	SCALE	SHEET NO.
SUNSET AURORA	1315 W Chisholm St Alpena, MI	ENLARGED 2 BR	03.04.2025	As indicated	TF-06

EARTH FIRST CONSULTING

PROJECT	PROJECT	DRAWING	DATE	SCALE	SHEET NO.
SUNSET AURORA	1315 W Chisholm St Alpena, MI	FRONT ELEVATION & SECTION	03.04.2025	1/16" = 1'-0"	TF-07



EARTH FIRST CONSULTING

PROJECT	PROJECT	DRAWING	DATE	SCALE	SHEET NO.
SUNSET AURORA	1315 W Chisholm St Alpena, MI	SHORT SECTION	03.04.2025	1/8" = 1'-0"	TF-08

EARTH FIRST CONSULTING

PROJECT	PROJECT	DRAWING	DATE	SCALE	SHEET NO.
SUNSET AURORA	1315 W Chisholm St Alpena, MI	EXTERIOR RENDER #1	03.04.2025		TF-09

EARTH FIRST CONSULTING

PROJECT	PROJECT	DRAWING	DATE	SCALE	SHEET NO.
SUNSET AURORA	1315 W Chisholm St Alpena, MI	EXTERIOR & LOBBY	03.04.2025		TF-10

EARTH FIRST CONSULTING	PROJECT	PROJECT	DRAWING	DATE	SCALE	SHEET NO.
	SUNSET AURORA	1315 W Chisholm St Alpena, MI	1 BR APARTMENT	03.04.2025		TF-11

EARTH FIRST CONSULTING

PROJECT	PROJECT	DRAWING	DATE	SCALE	SHEET NO.
SUNSET AURORA	1315 W Chisholm St Alpena, MI	2 BR APARTMENT	03.04.2025		TF-12

APPENDIX B

Asbestos Inspection Report

Otwell Mawby, P.C.
Consulting Engineers

August 26, 2024

Alpena County Land Bank Authority
C/o: Ms. Montiel Birmingham and Mr. Todd Mericon
Email: montielb@alpena.mi.us and todd@mericon.net

RE: ASBESTOS INSPECTION REPORT
COMMERCIAL BUILDING, 1315 WEST CHISHOLM STREET
CITY OF ALPENA, ALPENA COUNTY, MICHIGAN
OTWELL MAWBY PROJECT NUMBER: 24-102E

Dear Montiel and Todd:

At your request, Otwell Mawby, P.C. (Otwell Mawby) conducted a building material inspection to evaluate for the potential presence of asbestos-containing building materials (ACBMs) associated with the commercial building located at 1315 West Chisholm Street in the City of Alpena, Alpena County, Michigan (hereafter referenced as the subject property). The purpose of the inspection was for compliance National Emission Standards for Hazardous Air Pollutants (NESHAPs), specifically, 40 CFR Part 61, Subpart M, Asbestos. The regulation requires a thorough inspection be completed where renovation or demolition, including select demolition will occur. To complete the thorough inspection requirement under the NESHAPs Standard, our scope of the inspection included an evaluation of accessible and inaccessible suspect ACBMs on the interior and exterior of the building, utilizing a combination of non-destructive and destructive surveying and sampling techniques. Limitations to our inspection are noted in the corresponding section below.

The inspection was also completed for compliance with the with the Occupational Health and Safety Administration (OSHA) Standard 1910.1001 as the building is reportedly planned to be demolished using hired contractors. The Standard requires building and facility owners, with structures constructed pre-1980, to determine the presence, location and quantity of ACBMs and/ or presumed asbestos containing materials (PACMs) at a work site. The Standard also requires building and facility owners shall inform employers of employees, and employers shall inform employees who perform housekeeping activities in areas which contain ACBM and/or PACM of the presence and location of ACBMs and/or PACMs in such areas which may be contacted during such activities.

The scope of the inspection included an evaluation of accessible ACBMs on the interior and exterior of the building using destructive surveying and sampling techniques in preparation for future demolition of the structure. The inspected structure consisted of a single-story brick restaurant with a basement foundation.

This letter presents the findings of the asbestos inspection and serves as the Asbestos Inspection Report for the subject property.

Inspection and Sample Collection Protocols

To complete the Asbestos Building Material Inspection, Otwell Mawby provided a State of Michigan certified Asbestos Building Inspector. Otwell Mawby personnel conducted the inspection and sampling activities on August 20, 2024. During the inspection, suspect ACBMs were identified and grouped into

homogeneous areas (HAs). Based on visual observation of materials being similar in color, texture, and/ or their date of installation was likely similar, the materials were considered homogeneous, representing like materials and were grouped into HAs. During the inspection 21 homogeneous areas (HAs) were identified and sampled. A list of the identified HAs is provided on the chain-of-custody documentation attached in Appendix A. Also refer to Appendix B for a list of relevant asbestos inspection related terms and definitions. Appendix C contains photographs of the site.

From the identified HAs, bulk samples of suspect ACBMs were collected following United State Environmental Protection Agency (USEPA) Asbestos Hazard Emergency Response Act (AHERA) protocols. Bulk samples were categorized into one of three types of materials: surfacing material, thermal system insulation, or miscellaneous materials. Per the AHERA, bulk sample collection was conducted using the criteria identified in the following table.

Type of Material	Number of Samples Required
Surfacing Material	-
Area $\leq$ 1,000 SF	3
Area > 1,000 SF but $\leq$ 5,000 SF	5
Area > 5,000 SF	7
Thermal System Insulation (TSI)	3
Miscellaneous Materials	Sample in a manner sufficient to determine if material is or is not ACM, at discretion of Inspector

Samples were collected at the first location where each individual material was encountered. If a material was to be sampled more than once per USEPA sampling protocols, the material was sampled at the second location encountered and so on. If a material was only encountered within one area, bulk samples were collected from different areas within the location where the material was encountered.

In each accessible area, suspect ACBMs, if encountered, were sampled, following the protocols identified above to verify the potential asbestos content of the suspect ACBMs.

During the inspection a total of 45 samples were collected from the 21 identified HAs (suspect ACBMs) at the subject property. The sampled materials are listed on the chain of custody documentation contained within Appendix A. The attached Figure 1, shows the approximate sampling locations.

Analytical Protocol

Collected bulk samples were submitted under chain-of-custody for analysis to IMS Laboratory (IMS) of Commerce Township, Michigan using Polarized Light Microscopy (PLM). IMS is accredited by the National Voluntary Laboratory Accreditation Program (NVLAP) for the analysis of ACM in bulk samples using PLM (NVLAP Lab Code 201036-0). The laboratory was instructed to stop at the first sample determined to be positive for asbestos content from each respective HA (test-to-positive criteria). Per USEPA protocol, a positive finding of asbestos in a sample from an individual HA indicates the entire HA is positive for asbestos content.

Summary of Analytical Results

Of the 45 samples collected from the 21 HAs, the laboratory (utilizing the test to positive criteria) analyzed 48 samples. Four of the analyzed samples represented a separable layer of material identified by the laboratory from one of the original 45 samples. These layers were analyzed individually to determine their potential asbestos content. Of the 48 samples analyzed by the laboratory, one was identified to be an ACBM by PLM, as indicated in the following table. Based on the test-to-positive criteria, Sample 21B was not analyzed but based on the "A" sample for the HA, the entire HA associated with the material is considered asbestos containing, as noted in the following table.

Sample Number	Material Description (HA)	Sampling Location	Laboratory Analytical Result	Friable in Current State (Yes/ No)	Estimated Quantity and Location Identified
21A	Caulk, Black	Exterior, Around Window	10% Chrysotile	No	16-ft², Exterior, Around Windows (32 Windows, Each ~4' x 4')

The analytical laboratory results and the associated chain-of-custodies are attached as Appendix A.

Inaccessible Areas/Limitations

To the extent possible, Otwell Mawby inspected all accessible areas of the structure. Areas below the foundations were not inspected.

Foam insulation was observed in the roof and walls of the structure. The material is not suspect a ACBM, as a result, it was not sampled.

Summary/ Recommendations

Otwell Mawby completed an inspection to identify potential ACBMs on the interior and exterior of the building utilizing destructive surveying and sampling techniques for compliance with the OSHA/ NESHAPs Standards. Bulk samples of suspect ACBMs were collected and submitted to a third-party laboratory for analysis. Laboratory analytical results indicated that one of the sampled materials is asbestos containing. A copy of this report should be kept readily accessible at the subject property.

Prior to the commencement of the any renovation or demolition activities that could impact the ACBMs, Otwell Mawby recommends the ACBMs be removed by a qualified and licensed asbestos abatement professional following all applicable local, state, and federal laws prior to its disturbance. Removal of the ACBMs should be performed by a qualified asbestos abatement contractor licensed by the State of Michigan, Department of Licensing and Regulatory Affairs (LARA), Asbestos Program. **The asbestos contractor should visit the site and verify the approximated ACBM quantities provided by Otwell Mawby, prior to providing a cost for the abatement project.** A 10-day (business day) notification to the State of Michigan may be required prior to the commencement of the abatement activities. A 10-day (business day) NESHAP notification (Notification on Intent to Renovate/ Demolish (MIOSHA-CSH-142) to the State of Michigan is also be required for demolition of the building.

Otwell Mawby recommends that during demolition the personnel doing so are trained to identify potential ACBMs and if identified they should be tested to determine their asbestos content or be assumed to be ACBMs and handled as such. Suspect ACBMs or ACBMs should be handled by qualified and licensed asbestos abatement professionals following all applicable local, state, and federal laws.

All bulk sample collection that was performed by Otwell Mawby was completed by Mr. Steve Hemstreet. Mr. Hemstreet is accredited in the State of Michigan as an Asbestos Inspector. The inspection was managed and subsequent reporting was completed by Mr. James Jackson, who is also accredited in the State of Michigan as an Asbestos Inspector.

If you have any questions regarding this Report, please feel free to contact the undersigned at (231) 946-5200. We appreciate the opportunity to provide these services and thank you for your confidence in Otwell Mawby.

Sincerely,

OTWELL MAWBY, P.C.

James A. Jackson II
State of MI, Asbestos Inspector #A31826

Steve Hemstreet
State of Michigan, Asbestos Inspector #A54086

Attachments
Figures 1 – Site Map
Appendix A – Bulk Sampling Chain-of-Custodies and Laboratory Analytical Report
Appendix B – Asbestos Inspection Related Definitions
Appendix C – Site Photographs

FIGURES

FIGURE 1 – SITE MAP

1315 West Chrisholm Street

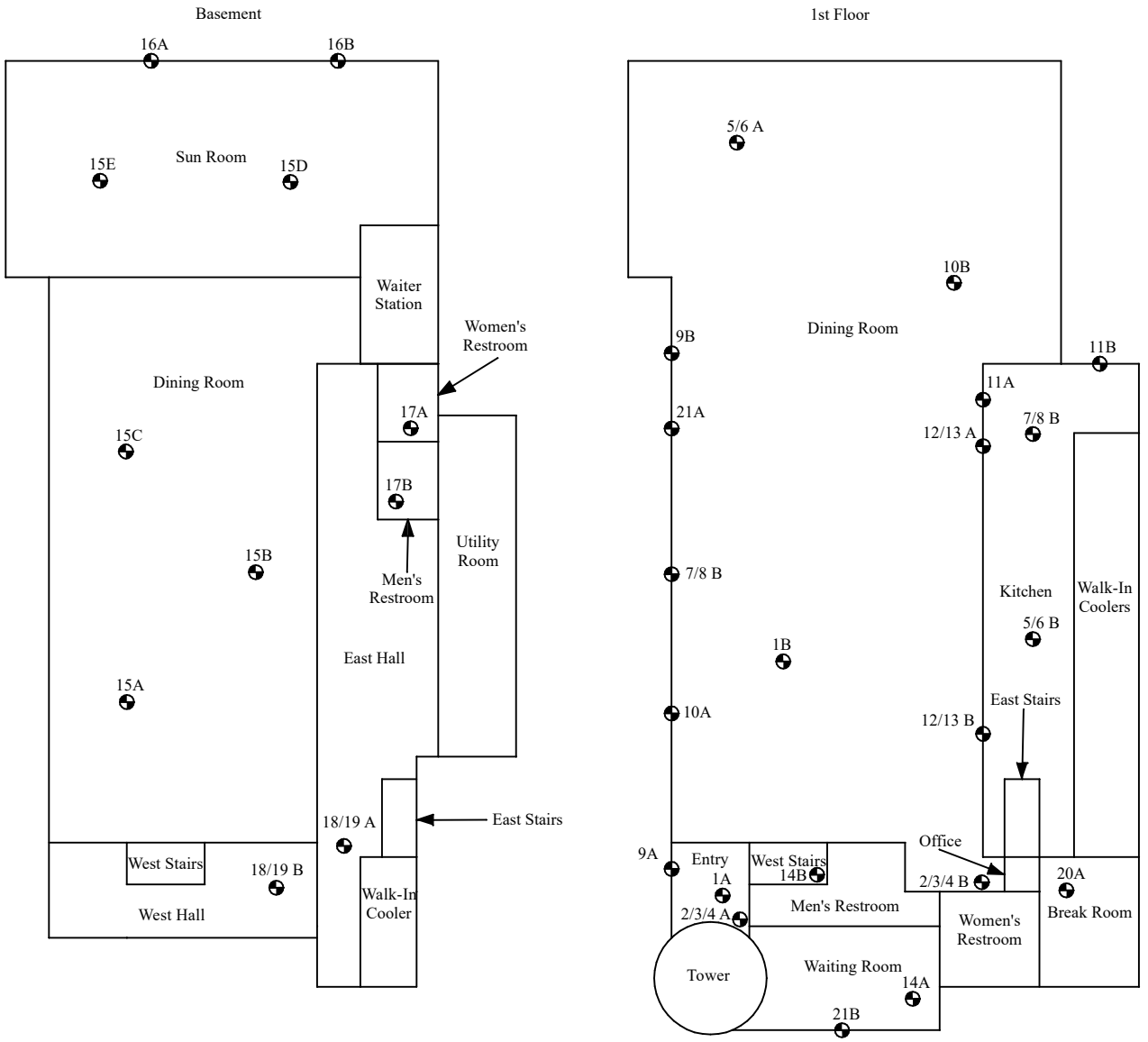
Legend

1A - Bulk Sample Location

Approximate Scale

0' 5' 10' 20'

North



1315 West Chrisholm Street City of Alpena, Alpena County, Michigan	Figure 3: Site Map		
Otwell Mawby, P.C. **Traverse City, Michigan**	**Date:** 8/21/2024	**Proj. No.:** 24-102E	**Scale:** ~ 1" = 10'

APPENDIX A

BULK SAMPLING CHAIN-OF-CUSTODIES AND LABORATORY ANALYTICAL REPORT

IMS Laboratory

3130 Old Farm Lane, Suite 1
Commerce Twp., MI 48390

877-665-3373

Asbestos Laboratory Report

Prepared Exclusively For:

Otwell Mawby, P.C.
James Jackson
309 E Front St, #200
Traverse City, MI 49684
(231) 946-5200
jjackson@otwellmawby.com

NVLAP TESTING
NVLAP LAB CODE: 201036-0

Lab ID # 172958

Project: 1315 W Chisholm St **Project # 24-102E** **Lab # A33540**

Report Date: 08/26/24 **Collected: 08/20/24** **Received: 08/23/24**

IMS Laboratory

Report Prepared For: Otwell Mawby, P.C.
Project Name: 1315 W Chisholm St
Project Number: 24-102E
Report Date: 08/26/24
Lab Number: A33540

Asbestos Report Summary

Test Method: Polarized Light Microscopy (PLM)

48 Samples Analyzed
1 Sample Containing >1% Asbestos

Greater than 1% Asbestos

Client ID	Lab Number	Description	Asbestos
21A	A33540 - 44	Caulk, Black / Exterior, Around Windows	Chrysotile 10%

IMS Laboratory

Report Prepared For: Otwell Mawby, P.C.
Project Name: 1315 W Chisholm St
Project Number: 24-102E
Report Date: 08/26/24
Lab Number: A33540

Certificate of Laboratory Analysis

Test Method: Polarized Light Microscopy (PLM)

EPA 600/R-93/116 and/or EPA - Appendix E to Subpart E of 40 CFR Part 763;
Interim Method for the Determination of Asbestos in Bulk Insulation Samples

Project: 1315 W Chisholm St
Project Number: 24-102E

Prepared For
Otwell Mawby, P.C.
James Jackson
309 E Front St, #200
Traverse City, MI 49684
(231) 946-5200
jjackson@otwellmawby.com

IMS Lab No. A33540
Date Collected: 08/20/24
Date Received: 08/23/24
Date Reported: 08/26/24

Client ID Lab No.	Client Description	Sample Color(s)	Laboratory Attributes	Fibrous Components	Non-Fibrous Components	Asbestos Type / Percent
1A A33540 - 1	Ceiling Panel, 2x2, Coarse / 1st Floor, Entryway, Ceiling	White Gray	Heterogeneous Friable Fibrous	10% Cellulose 80% Fiberglass	10% Matrix	No Asbestos Detected
1B A33540 - 2	Ceiling Panel, 2x2, Coarse / 1st Floor, Dining Room, Ceiling	White Gray	Heterogeneous Friable Fibrous	10% Cellulose 80% Fiberglass	10% Matrix	No Asbestos Detected
2A A33540 - 3	Drywall / 1st Floor, Entryway, Wall	White Brown	Heterogeneous Non-Friable Fibrous	12% Cellulose	88% Matrix	No Asbestos Detected
2B A33540 - 4	Drywall / 1st Floor, Dining Room, Wall	White Brown	Heterogeneous Non-Friable Fibrous	12% Cellulose	88% Matrix	No Asbestos Detected
3A A33540 - 5	Drywall Tape / 1st Floor, Entryway, Wall	White	Heterogeneous Friable Fibrous	90% Cellulose	10% Matrix	No Asbestos Detected
3B A33540 - 6	Drywall Tape / 1st Floor, Dining Room, Wall	White	Heterogeneous Friable Fibrous	90% Cellulose	10% Matrix	No Asbestos Detected
4A A33540 - 7	Drywall Mud / 1st Floor, Entryway, Wall	White	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
4B A33540 - 8	Drywall Mud / 1st Floor, Dining Room, Wall	White	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
5A A33540 - 9	Mortar, Gray / 1st Floor, Dining Room, Floor	Gray	Heterogeneous Non-Friable Non-Fibrous		20% Quartz 80% Matrix	No Asbestos Detected

IMS Laboratory

Report Prepared For: Otwell Mawby, P.C.
Project Name: 1315 W Chisholm St
Project Number: 24-102E
Report Date: 08/26/24
Lab Number: A33540

Client ID Lab No.	Client Description	Sample Color(s)	Laboratory Attributes	Fibrous Components	Non-Fibrous Components	Asbestos Type / Percent
5B A33540 - 10	Mortar, Gray / 1st Floor, Kitchen, Floor	Gray	Heterogeneous Non-Friable Non-Fibrous		20% Quartz 80% Matrix	No Asbestos Detected
6A A33540 - 11	Grout, Black / 1st Floor, Dining Room, Floor	Black	Heterogeneous Non-Friable Non-Fibrous		30% Quartz 70% Matrix	No Asbestos Detected
6B A33540 - 12	Grout, Black / 1st Floor, Kitchen, Floor	Black	Heterogeneous Non-Friable Non-Fibrous		30% Quartz 70% Matrix	No Asbestos Detected
7A A33540 - 13	Cove Base, Black / 1st Floor, Dining Room, Edge of Floor	Black	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
7B A33540 - 14	Cove Base, Black / 1st Floor, Kitchen, Edge of Floor	Black	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
8A A33540 - 15	Mastic, Tan / 1st Floor, Dining Room, Edge of Floor	Tan	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
8B A33540 - 16	Mastic, Tan / 1st Floor, Kitchen, Edge of Floor	Tan	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
9A A33540 - 17	Window Gasket, Black / 1st Floor, Entryway, Window	Black	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
9B A33540 - 18	Window Gasket, Black / 1st Floor, Dining Room, Window	Black	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
10A A33540 - 19	Glue, Tan / 1st Floor, Dining Room, Wall	Tan	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
10B A33540 - 20	Glue, Tan / 1st Floor, Dining Room, Wall	Tan	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
11A A33540 - 21	Glue, Tan / 1st Floor, Kitchen, Under Paneling	Tan	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
11B A33540 - 22	Glue, Tan / 1st Floor, Kitchen, Under Paneling	Tan	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
12A A33540 - 23	Mortar, White / 1st Floor, Kitchen, Wall	White	Heterogeneous Non-Friable Non-Fibrous		30% Quartz 70% Matrix	No Asbestos Detected
12B A33540 - 24	Mortar, White / 1st Floor, Kitchen, Wall	White	Heterogeneous Non-Friable Non-Fibrous		30% Quartz 70% Matrix	No Asbestos Detected
13A A33540 - 25	Cement Board, Gray / 1st Floor, Kitchen, Wall	Gray	Heterogeneous Non-Friable Non-Fibrous		20% Quartz 80% Matrix	No Asbestos Detected

IMS Laboratory

Report Prepared For: Otwell Mawby, P.C.
Project Name: 1315 W Chisholm St
Project Number: 24-102E
Report Date: 08/26/24
Lab Number: A33540

Client ID Lab No.	Client Description	Sample Color(s)	Laboratory Attributes	Fibrous Components	Non-Fibrous Components	Asbestos Type / Percent
13B A33540 - 26	Cement Board, Gray / 1st Floor, Kitchen, Wall	Gray	Heterogeneous Non-Friable Non-Fibrous		5% Quartz 95% Matrix	No Asbestos Detected
14A A33540 - 27	Carpet Mastic, Tan / 1st Floor, Waiting Room, Floor	Tan	Homogeneous Non-Friable Non-Fibrous		3% Quartz 97% Matrix	No Asbestos Detected
14B A33540 - 28	Carpet Mastic, Tan / 1st Floor, West Stair, Floor	Tan Brown	Heterogeneous Non-Friable Non-Fibrous	2% Cellulose	98% Matrix	No Asbestos Detected
15A A33540 - 29	Ceiling Texture, Pebble / Basement, Dining Room, Ceiling	White	Heterogeneous Friable Non-Fibrous		100% Matrix	No Asbestos Detected
15B A33540 - 30	Ceiling Texture, Pebble / Basement, Dining Room, Ceiling	White	Heterogeneous Friable Non-Fibrous		100% Matrix	No Asbestos Detected
15C A33540 - 31	Ceiling Texture, Pebble / Basement, Dining Room, Ceiling	White	Heterogeneous Friable Non-Fibrous		100% Matrix	No Asbestos Detected
15D A33540 - 32	Ceiling Texture, Pebble / Basement, Sun Room, Ceiling	White	Heterogeneous Friable Non-Fibrous		100% Matrix	No Asbestos Detected
15E A33540 - 33	Ceiling Texture, Pebble / Basement, Sun Room, Ceiling	White	Heterogeneous Friable Non-Fibrous		100% Matrix	No Asbestos Detected
16A A33540 - 34	Window Gasket, Brown / Basement, Sun Room, Sliding Door	Brown	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
16B A33540 - 35	Window Gasket, Brown / Basement, Sun Room, Sliding Door	Brown	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
17A A33540 - 36	Glue, Tan / Basement, Men's Restroom, Wall	Tan	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
17B A33540 - 37	Glue, Tan / Basement, Women's Restroom, Wall	Tan	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
18A A33540 - 38A	Tile, 12x12, White / Basement, West Hall, Floor	White	Heterogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
18A A33540 - 38B	Mastic*	Black	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected

*Material description provided by laboratory.

IMS Laboratory

Report Prepared For: Otwell Mawby, P.C.
Project Name: 1315 W Chisholm St
Project Number: 24-102E
Report Date: 08/26/24
Lab Number: A33540

Client ID Lab No.	Client Description	Sample Color(s)	Laboratory Attributes	Fibrous Components	Non-Fibrous Components	Asbestos Type / Percent
18B A33540 - 39A	Tile, 12x12, White / Basement, West Hall, Floor	White	Heterogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
18B A33540 - 39B	Mastic*	Black	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
19A A33540 - 40A	Tile, 12x12, Black / Basement, West Hall, Floor	Black	Heterogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
19A A33540 - 40B	Mastic*	Black	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
19B A33540 - 41A	Tile, 12x12, Black / Basement, West Hall, Floor	Black	Heterogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
19B A33540 - 41B	Mastic*	Black	Homogeneous Non-Friable Non-Fibrous		100% Matrix	No Asbestos Detected
20A A33540 - 42	Hot Tar Roof / Roof	Black	Heterogeneous Non-Friable Fibrous	10% Fiberglass	90% Matrix	No Asbestos Detected
20B A33540 - 43	Hot Tar Roof / Roof	Black	Heterogeneous Non-Friable Fibrous	10% Fiberglass	90% Matrix	No Asbestos Detected
21A A33540 - 44	Caulk, Black / Exterior, Around Windows	Black	Heterogeneous Non-Friable Fibrous	10% Chrysotile	90% Matrix	**Chrysotile 10%**
21B A33540 - 45	Caulk, Black / Exterior, Around Windows					Not Tested - Positive Stop # 44

*Material description provided by laboratory.

IMS Laboratory, LLC is accredited through the National Voluntary Laboratory Accreditation Program (NVLAP). Data is provided in compliance with NVLAP policy modules and ISO 17025:2017 guidelines.

NVLAP TESTING
NVLAP LAB CODE: 201036-0

08/26/24
Sean Bocek, Asbestos Laboratory Manager

Glossary

Actinolite - This form of asbestos was not commonly used commercially, but can be found occasionally in some building products.

Amosite - This form of asbestos was commonly used in ceiling tiles, cement sheets, pipe insulation, and in many different types of thermal insulation products.

Anthophyllite - This form of asbestos was not commonly used commercially, but can be found occasionally in some building products.

Asbestos - Any of six naturally occurring silicate minerals (Chrysotile, Amosite, Crocidolite, Tremolite, Actinolite, and Anthophyllite). Inhalation of these minerals can cause asbestosis and certain types of cancer. Because of asbestos' fireproofing and other desirable properties, these minerals can be found in many different types of building materials.

Chrysotile - This is the most commonly used form of asbestos and can be found today in many building components including floors, roofs, ceilings, walls and insulation cement materials, piping and sealants of residential and commercial buildings. It was also used in automobile brake pads, linings and blocks, clutch plates and gaskets.

Crocidolite - This form of asbestos has been used in some building products including cement, pipe insulation and spray-on coatings.

Fibrous - Any material that contains, consists of, or resembles fibers.

Friable - Any material that can be crumbled, pulverized, or reduced to powder by the pressure of an ordinary human hand. Friable asbestos containing materials are dangerous because they allow asbestos fibers to get into the air where they can be inhaled.

Heterogeneous - A mixture that consists of two or more substances. It is non-uniform and the different components of the mixture can be seen.

Homogeneous - A substance which has uniform composition and properties throughout.

Non-Fibrous - Any material that does not contain fibers.

Non-Friable - Any material that cannot be pulverized under hand pressure.

Tremolite - This form of asbestos was not commonly used commercially, but can be found in some roofing materials, insulation products (including vermiculite), paints, sealants, and talc powders.

Warranties, Legal Disclaimers, and Limitations

Stereoscopic microscopy and polarized light microscopy coupled with dispersion staining is the analytical technique used for sample identification. The percentage of each component is visually estimated by volume. The detection limit for this method is <1% by visual estimation and 0.25% by 400 point counts or 0.1% by 1,000 point counts. The samples were analyzed as submitted by the client and may not be representative of the larger material in question. IMS Laboratory, LLC ("IMS") will discard all samples after 7 days.

Matrix interference and/or resolution limits may yield false results in certain circumstances. Samples collected via tape and/or wipe may reduce sensitivity and reliability of quantification. Suspect floor tiles containing less than 1% asbestos should be tested with SEM or TEM. Many vinyl floor tiles have been manufactured using greater than 1% asbestos. Often the asbestos was milled to a fiber size below the detection limit of polarized light microscopy. Therefore, a "No Asbestos Found" reading on vinyl floor tile does not necessarily exclude the presence of asbestos. TEM provides a more conclusive form of analysis for vinyl floor tiles.

This certificate of analysis relates only to the samples tested, as recieved by IMS and, to insure the integrity of the results, may only be reproduced in full. IMS is not responsible for the accuracy of the results for layered samples or samples comprising multiple materials. Unless otherwise noted in the body of this report, the condition of samples upon receipt was acceptable.

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IMS accepts no legal responsibility for the purposes for which the client uses the test results. IMS will not be held responsible for the improper selection of sampling devices even if we supply the device to the user. The user of the sampling device has the sole responsibility to select the proper sampler and sampling conditions to insure that a valid sample is taken for analysis. Additionally, neither this report nor IMS makes any express or implied warranty or guarantee regarding the inspection or sampling done by the inspector, the qualifications, training or sampling methodology used by the inspector performing the sampling and inspection reported herein, or the accuracy of any information provided to IMS serving as a basis for this report. The total liability of IMS related to or arising from this report to a client or any third party, whether under contract law, tort law, warranty or otherwise, shall be limited to direct damages not to exceed the fees actually received by IMS from the client for the report. The invalidity or unenforceability, in whole or in part, of any provision, term or condition herein shall not invalidate or otherwise affect the enforceability of the remainder of these provisions, terms and conditions. Client shall indemnify IMS and its officers, directors and employees and hold each of them harmless for any liability, expense or cost, including reasonable attorney's fees, incurred by reason of any third party claim in connection with IMS's services, the test result data or its use by client.

- End of Lab Report Number A33540 -

IMS Laboratory

3130 Old Farm Ln · Ste 1
Commerce Twp, MI 48390
877.665.3373
www.imslaboratory.com

A33540

Asbestos Chain of Custody

Company/Branch: Otwell Mawby, P.C.	Phone: 231-946-5200
Company Contact: James Jackson	Email: jjackson@otwellmawby.com
Company Address: 309 E Front St, #200 Traverse City, MI 49684	

Project Name:	Project Number:	Sampling Date:	Analysis Type: PLM (Bulk)	PCM (Air)
1315 W. Chisholm St.	24-102E	8/20/24	☑	☐

	Material Description	Sample Location	HM # (Bulk)	Volume (Air)
01	Ceiling Panel, 2x2, Coarse	1st Floor, Entryway, Ceiling	1A	
02	〃 〃	, Diningroom, Ceiling	1B	
03	Drywall	Entryway, Wall	2A	
04	〃 〃	Diningroom, Wall	2B	
05	Drywall Tape	Entryway, Wall	3A	
06	〃 〃	Diningroom, Wall	3B	
07	Drywall Mud	Entryway, Wall	4A	
08	〃 〃	Diningroom, Wall	4B	
09	Mortar, Gray	Diningroom, Floor	5A	
10	〃 〃	Kitchen, Floor	5B	
11	Grout, Black	Diningroom, Floor	6A	
12	〃 〃	Kitchen, Floor	6B	
13	CoveBase, Black	Diningroom, Edge of Floor	7A	
14	Cove Base, Black	Kitchen, Edge of Floor	7B	
15	Mastic, Tan	Diningroom, Edge of Floor	8A	
16	〃 〃	Kitchen, Edge of Floor	8B	
17	Window Gasket, Black	Entryway, Window	9A	
18	〃 〃	Diningroom, Window	9B	
19	Glue, Tan	Diningroom, Wall	10A	
20	〃 〃	〃 〃	10B	

Lab Use Only

☑ Accept
☐ Accept with Comment
☐ Reject

Lab Comments:

A: _____ R: _____

Received By & Date

RECEIVED
AUG 23 2024

Time in: _____

Collected By: Steven Hemstreet

Relinquished By:

Turn Around Time ("TAT")

☐ 3 Hour ☐ Same Day (in before 12 PM)
☑ 1-2 Days ☐ 3-4 Days ☐ 5-7 days

Comments/Additional Services:

* If any component of the drywall system contains asbestos, please add a composite analysis of the entire drywall system (Drywall, Tape and Mud)

☑ Positive Stop ☐ Point Count if Positive & < _____ % Asbestos

Time measured in Bus. Hrs. & Bus. Days | 3 Hr. TAT is approx. | Same day samples received after 12 PM may be reported next bus. morning | | Hrs. of operation 9 – 5, M - F (holiday hours may vary) |

Version 6.5 Modified 03/25/2022

A33540

IMS Laboratory
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Commerce Twp, MI 48390
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Asbestos Chain of Custody

Company/Branch: Otwell Mawby, P.C.	Phone: 231-946-5200
Company Contact: James Jackson	Email: jjackson@otwellmawby.com
Company Address: 309 E Front St, #200 Traverse City, MI 49684	

Project Name:	Project Number:	Sampling Date:	Analysis Type: PLM (Bulk) ☑ PCM (Air) ☐
1315 W. Chisholm St.	24-102E	8/20/24	

	Material Description	1st Floor Sample Location	HM # (Bulk)	Volume (Air)
01	Glue, Tan	Kitchen, Under Paneling	11A	
02	" "	" "	11B	
03	Mortar, White	Kitchen, Wall	12A	
04	" "	" "	12B	
05	Cement Board, Gray	" "	13A	
06	" "	" "	13B	
07	Carpet Mastic, Tan	, Waiting Room, Floor	14A	
08	Carpet Mastic, Tan	, West Stair, Floor	14B	
09	Ceiling Texture, Pebble	Basement, Dining room, Ceiling	15A	
10	" "	" "	15B	
11	" "	" "	15C	
12	" "	, Sun Room, Ceiling	15D	
13	" "	" "	15E	
14	Window Gasket, Brown	, Sun Room, Sliding Door	16A	
15	" "	" "	16B	
16	Glue, Tan	Men's Restroom, Wall	17A	
17	" "	Women's Restroom, Wall	17B	
18	Tile, 12x12, White	West Hall, Floor	18A	
19	" "	" "	18B	
20	Tile, 12x12, Black	West Hall, Floor	19A	

Lab Use Only
☐ Accept
☐ Accept with Comment
☐ Reject
Lab Comments:
A: ____ R: ____
Received By & Date
RECEIVED
AUG 23 2024
Time in: ____

Collected By: Steven Hemstreet

Relinquished By:

Turn Around Time ("TAT")
☐ 3 Hour ☐ Same Day (in before 12 PM)
☑ 1-2 Days ☐ 3-4 Days ☐ 5-7 days

Comments/Additional Services:
* If any component of the drywall system contains asbestos, please add a composite analysis of the entire drywall system (Drywall, Tape and Mud)

☑ Positive Stop ☐ Point Count if Positive & < ____ % Asbestos

Time measured in Bus. Hrs. & Bus. Days | 3 Hr. TAT is approx. | Same day samples received after 12 PM may be reported next bus. morning | | Hrs. of operation 9 – 5, M - F (holiday hours may vary) |

Version 6.5 Modified 03/25/2022

A33540

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Asbestos Chain of Custody

Company/Branch: Otwell Mawby, P.C.		Phone: 231-946-5200	
Company Contact: James Jackson		Email: jjackson@otwellmawby.com	
Company Address: 309 E Front St, #200 Traverse City, MI 49684			
Project Name: 1315 W. Chisholm St.	Project Number: 24-102E	Sampling Date: 8/20/24	Analysis Type: PLM (Bulk) ☑ PCM (Air) ☐

	Material Description	Sample Location	HM # (Bulk)	Volume (Air)
01	Tile, 12x12, Black	Basement, West Hall, Floor	19B	
02	Hot Tar Roof	Roof	20A	
03	" "	" "	20B	
04	Caulk, Black	Exterior, Around Window	21A	
05	" "	" "	21B	
06				
07				
08				
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19				
20				

Lab Use Only
☐ Accept
☐ Accept with Comment
☐ Reject
Lab Comments:

A: _____ R: _____

Received By & Date
RECEIVED
AUG 23 2024
Time in: _____

Collected By: Steven Hemstreet

Relinquished by:

Turn Around Time ("TAT")
☐ 3 Hour ☐ Same Day (in before 12 PM)
☑ 1-2 Days ☐ 3-4 Days ☐ 5-7 days

Comments/Additional Services:
* If any component of the drywall system contains asbestos, please add a composite analysis of the entire drywall system (Drywall, Tape and Mud)

☑ Positive Stop ☐ Point Count if Positive & < _____ % Asbestos

Time measured in Bus. Hrs. & Bus. Days | 3 Hr. TAT is approx. | Same day samples received after 12 PM may be reported next bus. morning | | Hrs. of operation 9 – 5, M - F (holiday hours may vary) |

Version 6.5 Modified 03/25/2022

APPENDIX B

ASBESTOS SURVEY RELATED DEFINITIONS

General Asbestos Industry Related Terms/ Definitions

1. **Asbestos:** Includes chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos, and any of these minerals that has been chemically treated and/or altered. Asbestos is a mineral fiber that has been used commonly in a variety of building construction materials for insulation and as a fire-retardant.
2. **Asbestos-Containing Material (ACM):** Means any material containing more than one percent asbestos as determined by polarized light microscopy (PLM) analysis.
3. **Asbestos-Containing Building Material (ACBM):** Surfacing ACM, thermal system insulation (TSI) ACM, or miscellaneous ACM that is found in or on interior structural members or other parts of a school, public or commercial building.
4. **Accredited or Accreditation:** Refers to a personnel training or laboratory accredited in accordance with section 206 of Title II of the AHERA.
5. **Accessible:** Refers to ACM material subject to disturbance by building occupants, custodial, or maintenance personnel in the course of their normal activities.
6. **AHERA:** United States Environmental Protection Agency (USEPA) Asbestos Hazard Emergency Response Act.
7. **Bulk Samples:** Samples of suspect asbestos containing material.
8. **Chain of Custody:** Formal procedures for tracking samples and ensuring their integrity.
9. **Homogeneous Area:** Means an area of surfacing material, thermal system insulation or miscellaneous material that is uniform in color and texture.
10. **Friable:** Any material, which when dry, may be crumbled, pulverized, or reduced to a powder by hand pressure.
11. **Functional Space:** Means a room, group of rooms, or homogeneous area (including crawl spaces or the space between a dropped ceiling and the floor or roof deck above), such as classroom(s), a cafeteria, gymnasium, hallway(s) as designated for the accredited person.
12. **Miscellaneous Material:** Encompasses interior building material on structural components, structural members or fixtures, such as floor and ceiling tiles, and does not include surfacing material or thermal system insulation.
13. **NESHAP:** The EPA standard that regulates asbestos visible emissions to the outside air as well as disposal of friable asbestos waste from renovation/ demolition projects.
14. **Presumed Asbestos Containing Material (PACM):** Means thermal, surfacing and miscellaneous suspect material found in buildings constructed no later than 1980. OSHA says PACM may be "rebutted" pursuant to an AHERA inspection.
15. **Polarized Light Microscopy (PLM):** An optical microscopy technique for analyzing bulk samples for asbestos in which the sample is illuminated with polarized light (light which vibrates in only one plane) to distinguish between different types of asbestos fibers by their shape and unique optical properties.
16. **Renovation:** Means the modifying of any structure, or any portion thereof.
17. **Thermal System Insulation (TSI):** Means ACM applied to pipes, fittings, boilers, breeching, tanks, ducts or other structural components to prevent heat loss or gain.
18. **Surfacing Material:** Means material that is sprayed, troweled-on or otherwise applied to surfaces (such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, and other purposes).

APPENDIX C

SITE PHOTOGRAPHS

Photograph of the exterior of the building. The windows have asbestos containing caulk.

Photograph of the area where the building abuts the river. The windows have asbestos containing caulk.

Photograph of the interior of the building. The windows have asbestos containing caulk.

Photograph of the interior of the building. The windows have asbestos containing caulk.

Photograph of the interior of the building.

Photograph of the interior of the building. The windows have asbestos containing caulk.

Photograph of the interior of the building.

Photograph of the interior of the building.

Commercial Building **1315 West Chisholm Street** **City of Alpena, Alpena County, Michigan**	**Site Photographs**
Otwell Mawby, P.C. **Traverse City, Michigan**	**Date: August 20, 2024**

Otwell Mawby, P.C.
Consulting Engineers

February 28, 2025

Alpena County Land Bank Authority
C/o: Ms. Montiel Birmingham and Mr. Todd Mericon
Email: montielb@alpena.mi.us and todd@mericon.net

RE: SUPPLEMENTAL ASBESTOS INSPECTION REPORT
COMMERCIAL BUILDING, 1315 WEST CHISHOLM STREET
CITY OF ALPENA, ALPENA COUNTY, MICHIGAN
OTWELL MAWBY PROJECT NUMBER: 24-102E

Dear Montiel and Todd:

At your request, Otwell Mawby, P.C. (Otwell Mawby) conducted a supplemental inspection to evaluate the asbestos-containing building materials (ACBMs) present at 1315 West Chisholm Street in the City of Alpena, Alpena County, Michigan (hereafter referenced as the subject property). The purpose of the supplemental inspection was to evaluate and quantify inconsistencies between the ACBMs reported in Otwell Mawby's August 26, 2024 Asbestos Inspection Report, and the materials and quantities encountered during abatement activities.

Inspection and Sample Collection Protocols

To complete the Supplemental Asbestos Building Material Inspection, Otwell Mawby provided a State of Michigan certified Asbestos Building Inspectors. Otwell Mawby personnel conducted the inspection and sampling activities on February 25 and 28, 2025. During the supplemental inspection, a previously inaccessible gray caulk was identified and sampled to determine its potential to contain asbestos. Additionally, the quantities of previously identified black caulk (HA-21) we adjusted to account for conditions uncovered during abatement.

Analytical Protocol

Collected bulk samples were submitted under chain-of-custody for analysis to Environmental Testing Laboratories (ETL) of Romulus, Michigan using Polarized Light Microscopy (PLM). ETL is accredited by the National Voluntary Laboratory Accreditation Program (NVLAP) for the analysis of ACM in bulk samples using PLM (NVLAP Lab Code 201028-0). The laboratory was instructed to stop at the first sample determined to be positive for asbestos content from each respective HA (test-to-positive criteria). Per USEPA protocol, a positive finding of asbestos in a sample from an individual HA indicates the entire HA is positive for asbestos content.

Summary of Analytical Results

One sample was analyzed by the laboratory and identified to be an ACBM by PLM, as indicated in the table on the following page. Additionally, the quantities for the previously identified materials were corrected to match the quantities observed during the February 28, 2025 site visit.

Sample Number	Material Description (HA)	Sampling Location	Laboratory Analytical Result	Friable in Current State (Yes/ No)	Estimated Quantity and Location Identified
21A	Caulk, Black	Exterior, Around Window	10% Chrysotile	No	24-ft², Exterior, Around Windows (24 Windows, Each ~4' x 4') 2-ft², Kitchen Entrance Door (1-Door, 3'x 7')
01-01	Gray Window Caulk	Exterior, Window Frame	4% Chrysotile	No	12-ft², Exterior, Window Frames (24 Windows, Each ~4' x 4')

The analytical laboratory results and the associated chain-of-custodies are attached as Appendix A.

Inaccessible Areas/Limitations

Otwell Mawby's scope of work was limited to evaluating materials and quantities encountered during abatement activities. The sampling event described within this writing was not intended to be a comprehensive asbestos inspection of the building.

Summary/ Recommendations

Otwell Mawby completed a supplemental inspection to evaluate the ACBMs encountered during abatement activities at the subject property. Bulk samples of suspect ACBMs were collected and submitted to a third-party laboratory for analysis. Laboratory analytical results indicated that one of the sampled materials is asbestos containing. The quantities of previously identified ACBMs were updated to reflect quantities encountered during abatement. A copy of this report should be kept readily accessible at the subject property.

Prior to the commencement of the any renovation or demolition activities that could impact the ACBMs, Otwell Mawby recommends the ACBMs be removed by a qualified and licensed asbestos abatement professional following all applicable local, state, and federal laws prior to its disturbance. Removal of the ACBMs should be performed by a qualified asbestos abatement contractor licensed by the State of Michigan, Department of Licensing and Regulatory Affairs (LARA), Asbestos Program. **The asbestos contractor should visit the site and verify the approximated ACBM quantities provided by Otwell Mawby, prior to providing a cost for the abatement project.** A 10-day (business day) notification to the State of Michigan may be required prior to the commencement of the abatement activities. A 10-day (business day) NESHAP notification (Notification on Intent to Renovate/ Demolish (MIOSHA-CSH-142) to the State of Michigan is also be required for demolition of the building.

Otwell Mawby recommends that during demolition the personnel doing so are trained to identify potential ACBMs and if identified they should be tested to determine their asbestos content or be assumed to be ACBMs and handled as such. Suspect ACBMs or ACBMs should be handled by qualified and licensed asbestos abatement professionals following all applicable local, state, and federal laws.

Bulk sample collection was completed by Mr. Kyle Leaveslsey. Quantification was completed by Mr. Jonathan Pines. Mr. Leavesley and Mr. Pines are accredited in the State of Michigan as an Asbestos Inspectors. The inspection was managed and subsequent reporting was completed by Mr. Steve Hemstreet, who is also accredited in the State of Michigan as an Asbestos Inspector.

If you have any questions regarding this Report, please feel free to contact the undersigned at (231) 946-5200. We appreciate the opportunity to provide these services and thank you for your confidence in Otwell Mawby.

Sincerely,

OTWELL MAWBY, P.C.

Steve Hemstreet
State of MI, Asbestos Inspector #A A54086

Jonathan Y Pines
State of MI, Asbestos Inspector #60683

Attachments Appendix A – Bulk Sampling Chain-of-Custodies and Laboratory Analytical Report
Appendix B – Asbestos Inspection Related Definitions

APPENDIX A

BULK SAMPLING CHAIN-OF-CUSTODIES AND LABORATORY ANALYTICAL REPORT

Environmental Testing Laboratories, Inc.

37575 W Huron River Drive
Romulus, Michigan 48174
(734) 955-6600
Fax: (734) 955-6604

To: Leavesley Construction LLC
920 Commerce Dr.
Alpena, MI 49707

ETL Job: 276819
Client Project: 401

Attention: Jackie Leavesley
Project Location: 1315 W. Chisholm, Alpena, MI 49707
Big Boy Windows

Lab Sample Number	Client Sample Number	Sample Type	Completed
1760606	#01-01	Asbestos	02/26/2025

Reviewed by:

Dawson Bradley

Summary

Method	Sample	Layer	Mastic
PLM	1		

NVLAP LAB CODE 201028-0

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 : Leavesley Construction LLC
920 Commerce Dr.
Alpena,MI 49707

Location : 1315 W. Chisholm, Alpena, MI 49707
Big Boy Windows

ETL Job : 276819
Client Project : 401
Date Collected : 02/25/2025
Date Received : 02/26/2025

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
1760606 #01-01 Kyle Leavesley Inspector, A60979 Layer-1 Analyst: Ben Jones Date Analyzed : 02/26/2025	Window Caulk	Gray Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 96% Other	PLM 4% Chrysotile

Emily Schroder

Lab Supervisor/Other Signatory

Analyst:

Ben Jones

Ben Jones

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).

ENVIRONMENTAL TESTING LABORATORIES, INC

37575 W Huron River Drive
Romulus, Michigan 48174
(734) 955-6600
Fax: (734) 992-2261
www.2etl.com

Chain of Custody

Client: Leavesley Construction	**Contact:** JACKIE	**ETL Project #:** 276819	
	Phone: 989 884 3158	**Project Location/Name:** BIG BOY WINDOWS	
Address: 925 commerce DR Alpena MI 49707	**Fax:**	1315 W. Chisholm Alpena MI 49707	
	E-mail: leavesleyoffice@gmail.com	**Client Project #:** 401	
Please Provide Results: ☑ Email ☐ Fax ☐ Verbal ☐ Other		**Date Sampled:** 2/25/2025	

Turnaround Time (TAT): ☐ RUSH (2 hrs) ☒ Same Day ☐ 24 hrs ☐ 48 hrs ☐ 72 hrs ☐ Standard (5 days)
(If not checked, standard TAT will be assumed) TAT Based on Business Hours Monday-Friday | *Rush unavailable for Soot/Char/Ash % analysis. Limited TATs available for large volume.

Sample Type (Check Only One)

Asbestos: ☑ Bulk (PLM) ☐ Bulk (TEM) ☐ Dust ☐ Air (PCM) ☐ Air (TEM) | **Mold:** ☐ Tape ☐ Bulk ☐ Air-O-Cell ☐ Air (Other) | ☐ Nuisance Dust

Combustion Tape: ☐ Basic: Total Combustion Particles ☐ Advanced: Soot/Char/Ash % — *3M® Scotch™ Magic Tape is required for combustion analysis*

Asbestos Analysis Information (Check all that Apply)

Stop at 1st Positive: ☐ Yes / ☐ No (Clearly mark each homogeneous area) | **Point Counting:** ☐ Yes / ☐ No ☐ *400 Points ☐ *1000 Points

☐ *Gravimetric Reduction ☐ *Soil or Vermiculite Analysis | **Point Counting Criteria:**

** Additional charge and turnaround may be required*

1760

Lab ID	Sample ID	Sample Location/Time Sampled	Material or Sample Description	Air Samples Only: Start	Stop	Volume
6060	#01-01	Kyle Leavesley A 60979 inspector 1105 AM / PM	Gray Window Caulk			
		AM / PM				
		AM / PM				
		AM / PM				
		AM / PM				
		AM / PM				
		AM / PM				
		AM / PM				
		AM / PM				
		AM / PM				
		AM / PM				
		AM / PM				

		Date	Time
Relinquished (Name/Organization):	Leavesley Construction	2/25/2025	AM / PM
Received (Name/ETL):		2/26/25	11:46 AM / PM
Stereoscopical/Sample Analysis (Name/ETL):			

Special Instructions:

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
**Rushes are not accepted after 3:00 PM and Same Days are not accepted after 2:00 PM

APPENDIX B

ASBESTOS SURVEY RELATED DEFINITIONS

General Asbestos Industry Related Terms/ Definitions

1. **Asbestos:** Includes chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos, and any of these minerals that has been chemically treated and/or altered. Asbestos is a mineral fiber that has been used commonly in a variety of building construction materials for insulation and as a fire-retardant.
2. **Asbestos-Containing Material (ACM):** Means any material containing more than one percent asbestos as determined by polarized light microscopy (PLM) analysis.
3. **Asbestos-Containing Building Material (ACBM):** Surfacing ACM, thermal system insulation (TSI) ACM, or miscellaneous ACM that is found in or on interior structural members or other parts of a school, public or commercial building.
4. **Accredited or Accreditation:** Refers to a personnel training or laboratory accredited in accordance with section 206 of Title II of the AHERA.
5. **Accessible:** Refers to ACM material subject to disturbance by building occupants, custodial, or maintenance personnel in the course of their normal activities.
6. **AHERA:** United States Environmental Protection Agency (USEPA) Asbestos Hazard Emergency Response Act.
7. **Bulk Samples:** Samples of suspect asbestos containing material.
8. **Chain of Custody:** Formal procedures for tracking samples and ensuring their integrity.
9. **Homogeneous Area:** Means an area of surfacing material, thermal system insulation or miscellaneous material that is uniform in color and texture.
10. **Friable:** Any material, which when dry, may be crumbled, pulverized, or reduced to a powder by hand pressure.
11. **Functional Space:** Means a room, group of rooms, or homogeneous area (including crawl spaces or the space between a dropped ceiling and the floor or roof deck above), such as classroom(s), a cafeteria, gymnasium, hallway(s) as designated for the accredited person.
12. **Miscellaneous Material:** Encompasses interior building material on structural components, structural members or fixtures, such as floor and ceiling tiles, and does not include surfacing material or thermal system insulation.
13. **NESHAP:** The EPA standard that regulates asbestos visible emissions to the outside air as well as disposal of friable asbestos waste from renovation/ demolition projects.
14. **Presumed Asbestos Containing Material (PACM):** Means thermal, surfacing and miscellaneous suspect material found in buildings constructed no later than 1980. OSHA says PACM may be "rebutted" pursuant to an AHERA inspection.
15. **Polarized Light Microscopy (PLM):** An optical microscopy technique for analyzing bulk samples for asbestos in which the sample is illuminated with polarized light (light which vibrates in only one plane) to distinguish between different types of asbestos fibers by their shape and unique optical properties.
16. **Renovation:** Means the modifying of any structure, or any portion thereof.
17. **Thermal System Insulation (TSI):** Means ACM applied to pipes, fittings, boilers, breeching, tanks, ducts or other structural components to prevent heat loss or gain.
18. **Surfacing Material:** Means material that is sprayed, troweled-on or otherwise applied to surfaces (such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, and other purposes).

APPENDIX C

Hazardous Material and Universal Waste Inspection Report

Otwell Mawby, P.C.
Consulting Engineers

August 21, 2024

Alpena County Land Bank Authority
C/o: Ms. Montiel Birmingham and Mr. Todd Mericon
Email: montielb@alpena.mi.us and todd@mericon.net

RE: HAZARDOUS MATERIAL AND UNIVERSAL WASTE INSPECTION REPORT COMMERCIAL BUILDING, 1315 WEST CHISHOLM STREET CITY OF ALPENA, ALPENA COUNTY, MICHIGAN OTWELL MAWBY PROJECT NUMBER: 24-102E

Dear Montiel and Todd:

At your request, Otwell Mawby, P.C. (Otwell Mawby) completed an inspection of the commercial building located at 1315 West Chisholm Street in the City of Alpena, Alpena County, Michigan to determine the potential presence hazardous materials and universal waste products. The inspection was completed on August 20 2024. This document presents the findings of the inspection and serves as the Hazardous Materials and Universal Waste Inspection Report for the referenced property.

The United States Environmental Protection Agency's (USEPA's) Universal Waste Rule, as adopted by the State of Michigan, governs the collection and management of widely generated waste products to prevent environmental contamination and promote recycling or treatment. The Universal Waste Rule allows for the collection, recycling, treatment, and disposal of household quantities of these materials to prevent over-disposal and concentration of hazardous wastes within landfills. Universal Wastes in Michigan include items such as antifreeze, batteries, consumer electronics, pesticides, pharmaceuticals, mercury-containing equipment, and electric lamps (fluorescent, sodium or mercury vapor, neon, high intensity discharge, incandescent, cathode ray tubes (television and computer screens). Additionally, batteries, pesticides, mercury-containing equipment, and fluorescent lamps are considered hazardous wastes and are subject to more stringent hazardous waste regulations unless they are managed as universal wastes.

During the inspection, Otwell Mawby visually identified the items listed in the attached table as being characterized as Universal Wastes per the USEPA's Universal Waste Rule, some of which could also be characterized as hazardous wastes if not managed as Universal Wastes. The locations of the identified potentially hazardous material/ Universal Waste is depicted on the attached Table 1. The spaces within the structure are shown on the attached Figure 1. Refer to Appendix A for photographs that depict the structure.

Otwell Mawby recommends all listed Universal Wastes, including those that possibly could also be categorized as hazardous wastes, be properly disposed/ recycled if they are not intended to be reused, by a licensed waste hauler prior to commencement of demolition of the building.

If you should have any questions regarding this Report, please feel free to contact the undersigned. Thank you again for your confidence in Otwell Mawby, we enjoyed working with you on this project.

Sincerely,

OTWELL MAWBY, P.C.

James A. Jackson II
Senior Project Manager

Steve Hemstreet
Staff Engineer

Attachments:
Figure 1 – Site Map
Table 1 - Universal Waste Inspection Summary Table
Appendix A – Site Photographs

FIGURES

FIGURE 1 – Site Map

1315 West Chrisholm Street

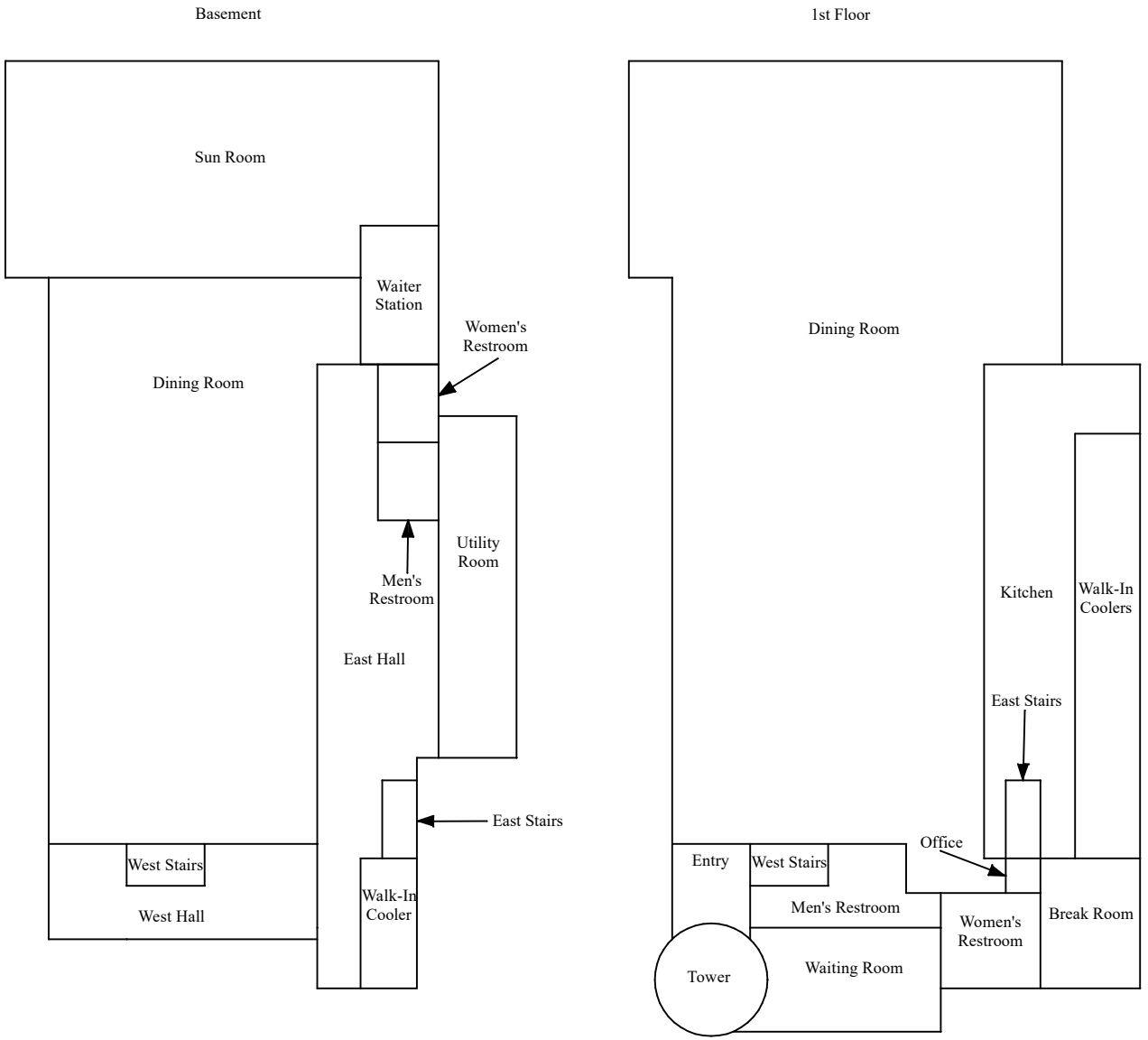
Legend

1A - Bulk Sample Location

Approximate Scale

0' 5' 10' 20'

North



1315 West Chrisholm Street City of Alpena, Alpena County, Michigan	Figure 1: Site Map		
Otwell Mawby, P.C. **Traverse City, Michigan**	**Date:** 8/21/2024	**Proj. No.:** 24-102E	**Scale:** ~ 1" = 10'

TABLES

Table 1 – UNIVERSAL WASTE INSPECTION SUMMARY TABLE

Table 1 - Universal Waste Inspection Summary Table

Project Name: Commercial Building, 1315 West Chisholm Street

Date: 8/20/2024

Otwell Mawby Project Number: 24-102E

Surveyor: Steve Hemstreet

Item Location	Item Description	Estimated Quantity	Notes
Basement, Sunroom	Exit Sign	1	
Basement, Sunroom	Latex Paint	1	5-Gallon Container
Basement, Sunroom	Spray Paint Can	2	
Basement, Sunroom	Thermoneter	1	
Basement, Dining Room	Exit Sign	1	
Basement, Dining Room	Emergency Light	1	
Basement, Dining Room	4' Fluorscent Light Bulb	12	
Basement, Dining Room	Flourcent Ballast	5	
Basement, Dining Room	Paint Can	1	1-Gallon Container
Basement, Dining Room	Fire Extinguisher	1	
Basement, East Hallway	Flourcent Ballast	5	
Basement, East Hallway	4' Fluorscent Light Bulb	20	
Basement, East Hallway	Roof Tar	2	5-Gallon Container
Basement, Men's Restroom	Flourcent Ballast	1	
Basement, Men's Restroom	4' Fluorscent Light Bulb	4	
Basement, Women's Restroom	Flourcent Ballast	1	
Basement, Women's Restroom	4' Fluorscent Light Bulb	4	
Basement, Utility Room	Flourcent Ballast	2	
Basement, Utility Room	4' Fluorscent Light Bulb	6	
Basement, Utility Room	Refrigerator Compressor	3	~1' x 1' x 2'

Table 1 - Universal Waste Inspection Summary Table

Project Name: Commercial Building, 1315 West Chisholm Street

Date: 8/20/2024

Otwell Mawby Project Number: 24-102E

Surveyor: Steve Hemstreet

Item Location	Item Description	Estimated Quantity	Notes
Entryway	LED Light	2	4" Disk
1st Floor, Men's Restroom	Flourcent Ballast	4	
1st Floor, Men's Restroom	4' Fluorscent Light Bulb	16	
1st Floor, Women's Restroom	Flourcent Ballast	4	
1st Floor, Women's Restroom	4' Fluorscent Light Bulb	16	
1st Floor, Office	LED Light	2	4" Disk
Roof	Air Conditioner	6	Drain Referidgerant
Exterior	LED Light	32	4" Disk
Basement, West Hallway	Refrigerator Compressor	7	~1' x 1' x 2'
Basement, West Hallway	Flourcent Ballast	4	
Basement, West Hallway	4' Fluorscent Light Bulb	8	
Basement, Walk-In Cooler	4' LED Light	1	
Waiting Room	LED Television	1	50"
Waiting Room	Thermostat	1	
Tower	Exit Sign	12	
1st Floor, Dining Room	Exit Sign	1	
1st Floor, Dining Room	Emergency Light	1	
1st Floor, Dining Room	Thermostat	2	
1st Floor, Dining Room	LED Light	25	4" Disk
Kitchen	Flourcent Ballast	21	

Table 1 - Universal Waste Inspection Summary Table

Project Name: Commercial Building, 1315 West Chisholm Street

Date: 8/20/2024

Otwell Mawby Project Number: 24-102E

Surveyor: Steve Hemstreet

Item Location	Item Description	Estimated Quantity	Notes
Kitchen	4' Fluorscent Light Bulb	84	
Kitchen	Fire Suppression Panel	3	
Kitchen	Fire Extinguisher	3	
Breakroom	Flourcent Ballast	5	
Breakroom	4' Fluorscent Light Bulb	20	
East Stairwell	Flourcent Ballast	1	
East Stairwell	4' Fluorscent Light Bulb	4	

APPENDIX A

SITE PHOTOGRAPHS

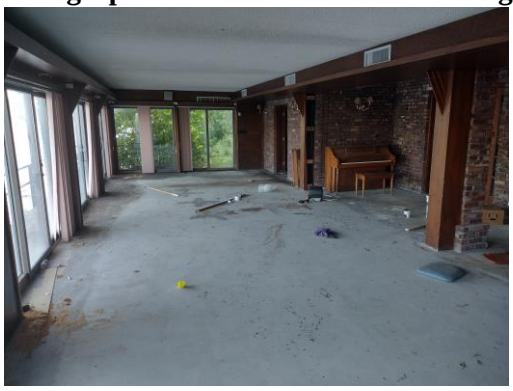
Photograph of the exterior of the building.

Photograph of the area where the building abuts the river.

Photograph of the interior of the building.

Photograph of the interior of the building.

Photograph of the interior of the building.



Photograph of the interior of the building.

Photograph of the interior of the building.

Photograph of the interior of the building.

Commercial Building **1315 West Chisholm Street** **City of Alpena, Alpena County, Michigan**	**Site Photographs**
Otwell Mawby, P.C. **Traverse City, Michigan**	**Date: August 20, 2024**

APPENDIX D

Asbestos and Universal Waste Visual Clearance Report

Otwell Mawby, P.C.
Consulting Engineers

March 5, 2025

Alpena County Land Bank Authority
C/o: Ms. Montiel Birmingham and Mr. Todd Mericon
Email: montielb@alpena.mi.us and todd@mericon.net

RE: ASBESTOS AND UNIVERSAL WASTE VISUAL CLEARANCE REPORT
1315 WEST CHISHOLM STREET, CITY OF ALPENA, ALPENA CO., MI
OTWELL MAWBY PROJECT NUMBER: 24-102E

Dear Montiel and Todd:

At your request, Otwell Mawby, P.C. (Otwell Mawby) performed a visual inspection to verify all previously identified asbestos containing materials and universal wastes were removed from the commercial building located at 1315 West Chisholm Street in the City of Alpena, Alpena County, Michigan (hereafter referenced as the subject property) following completion of abatement activities. The abatement/ removal activities were completed by Leavesley Construction, LLC (Leavesley).

Asbestos Visual Clearance

Following the completion of the abatement work by Leavesley, Otwell Mawby completed a visual inspection to verify all asbestos containing materials identified within Otwell Mawby's Asbestos Inspection Report, dated December August 26, 2024 had been successfully removed. Additionally, Leavesley reportedly found and disposed of an additional layer of gray window caulk within the interior portions of the windows that was not previously identified. The material was assumed to be asbestos containing and was removed as such. Each of the abated materials were categorized as non-friable and were removed using intact methods, as a result, air clearance sampling is required by Michigan Occupational Safety and Health Administration (MIOSHA) or Environmental Protection Agency's (EPA) regulations.

On February 28, 2025, Otwell Mawby completed a visual inspection to verify the removal was successfully completed and all of the materials were confirmed to have been removed.

Universal Waste Visual Clearance

On February 28, 2025 Otwell Mawby also completed a visual clearance to confirm all universal waste identified within Otwell Mawby's Universal Waste Inspection Report, dated December August 21, 2024 had been removed from the building. Following completion of our inspection, all wastes were confirmed to have been removed.

If you have any questions regarding this report, please feel free to contact the undersigned at (231) 946-5200. We appreciate the opportunity to provide these services and thank you for your confidence in Otwell Mawby.

Sincerely,
OTWELL MAWBY, P.C.

Jonathan Y. Pines
State of Michigan, Asbestos Inspector #A60683