# CHEROKEE NATION
## Environmental Programs

# Asbestos Sampling Report

**PARTICIPANT:** ROWAN, THEDA

**PREPARED BY:** Logan Girty **DATE:** 5/9/2025
LOGAN GIRTY. ENVIRONMENTAL SPECIALIST III

**REQUESTED BY:** HACN HOUSING REHABILITATION –
JAMIE WALTERS

TABLE OF CONTENTS

## I. Site Inspection/Description

Cherokee Nation Environmental Programs (CNEP) has conducted asbestos sampling for the presence of asbestos containing materials (ACM) for the following site:

Theda Rowan
312 W. Blackjack, Ft.Gibson, OK 74434
918-869-6547
Coordinates: 35.7981 / -95.2544

The sampling was performed to determine the presence of all ACM from within the affected parts of the structure for EPA's National Emissions of Hazardous Air Pollutants (NESHAP) compliance as well as OSHA worker protection.

The inspector responsible for this project was:

Logan Girty, AHERA Inspector

The sampling was conducted on April 30, 2025 at the request of the Cherokee Nation Housing Rehabilitation Department.

The site is a single family home built in 1970. Sampling was limited to areas that would be affected by the project scope of work (Appendix A) provided by the housing rehabilitation department.

**ACM was found at this site.** See Section IV for locations.

## II. BACKGROUND

The Oklahoma Department of Environmental Quality (ODEQ) has adopted EPA's NESHAP regulation under OAC252:100, 41-15 and has been delegated authority in the state of Oklahoma for its enforcement. Section 61.145(a) of Federal EPA regulation states that prior to commencement of the demolition or renovation of a facility a thorough inspection of the affected part or parts of a facility is required to determine the presence of all asbestos including Category I and Category II non-friable, and friable ACM. ACM is defined by EPA and OSHA as any material that contains greater than 1% asbestos.

## III. FIELD PROCEDURES AND ANALYTICAL METHODS

During the on-site inspection, we visually assessed the physical characteristics of suspect asbestos-containing materials (SACM) based on homogeneous areas. Homogeneous areas are areas of asbestos similar in color, texture, and construction, date of application, and in general

appearance. For purposes of renovation and demolition, homogeneous areas of SACM can be further classified according to NESHAPs rules by whether the material is friable, Category I non-friable, or Category II non-friable.

Friable ACM is defined by NESHAPs rules as any material containing more than 1% asbestos as determined by Polarized Light Microscopy (PLM), that, when dry, can be crumbled, pulverized or reduced to powder by hand pressure.

Category I Non-friable ACM is defined by NESHAPs rules as any asbestos-containing packings, gaskets, construction mastics, resilient floor covering (i.e. floor tiles, roll sheet flooring) or asphalt roofing products that contain more than 1% asbestos as determined by PLM.

Category II Non-friable ACM is defined by NESHAPs rules as any material, excluding Category I non-friable ACM, containing more than 1% asbestos as determined by PLM, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Typically, non-friable materials, such as transite (cementious products) and vinyl floor tiles are not regulated by the State of Oklahoma provided they do not become friable. General deterioration, machine grinding, drilling, sanding, and dry-buffing are all ways of causing non-friable materials to become classified as Regulated Asbestos Containing Materials (RACM). All friable materials are classified RACM. Please note that the following materials, even though classified as non-friable are fully regulated by Oklahoma Department of Labor for removal purposes as friable material: ceiling tiles, roll sheet flooring (linoleum), and joint wall compound when deemed friable

In addition to classification of suspect material into friable and non-friable materials, a determination of current condition was conducted as part of the physical assessment. The condition noted is the representative of the material at the time of inspection. Conditions of materials can change very quickly when disturbed. All suspect material was placed in one of the following categories of condition.

Significantly damaged: Material that is damaged, blistered, deteriorated, water stained over at least 10% of its total area.

Damaged: Material that is damaged, blistered, deteriorated, water stained less than 10% of its total area.

Good: Material that has no visible damage or deterioration.

Guidelines used for the number of samples collected per homogeneous area were determined using the Asbestos Hazard Emergency Response Act (AHERA) protocol promulgated in 40 CFR 763, Appendix E as follows:

Surfacing materials – material that is sprayed or troweled on wall, ceilings, or support columns for fireproofing, acoustical, or even decorative purpose.

- Less than 1000 ft2 – Minimum 3 samples
- From 1000-5000 ft2 – Minimum 5 samples
- Greater than 5000 ft2 – Minimum 7 samples

Thermal System Insulation (TSI) materials – thermal system insulation material applied to tanks, boiler, pipes or other structural component for an insulating purpose.

- May omit areas of fibrous glass, foam glass, rubber, and Styrofoam form sampling. Areas that have mastic on seams or outer jacketing will be sampled.
- At least three samples must be collected from each homogeneous area of TSI.
- Plus an additional sample from each patched area of less than 6 linear feet.
- Fittings require a sufficient amount to determine positive or negative nature.
- Inspector will first collect samples from damaged areas, exposed ends, or areas missing jacketing first.

Miscellaneous materials – all other material that are not thermal system insulation or surfacing materials. This includes gaskets, packings, joint wall compound, cementious asbestos materials, ceiling tiles resilient flooring materials, construction mastics, etc..

- May assume and document as such
- A sufficient amount of samples to determine negative or positive nature. A minimum or one per suspect homogeneous area.
- Collect samples from inconspicuous locations.
- Material such as cementious asbestos or vibration dampening cloths should not be sampled and will be assumed ACM unless instructed by client to collect these samples.

Bulk samples of suspect ACM were analyzed by Polarized Light Microscopy (PLM) in accordance with EPA Methods 600R-93/116. All samples were sent to a NVLAP accredited laboratory for analysis. QuanTEM Laboratories, LLC (NVLAP # 101959-0) in Oklahoma City, OK analyzed the samples. A copy of the full laboratory report and chain of custody can be found in Appendix B.

## IV. SUMMARY OF FINDINGS

A total of 4 samples were analyzed from 4 homogeneous areas due to multi-layers of material within some homogeneous sample areas. All accessible and observable areas within the renovation area were sampled for ACM. Samples were not taken of suspect materials that may have placed the inspector at risk of injury (i.e. electrical panel boxes). Any suspect ACM that have not been tested and/or found positive for asbestos must be assumed ACM until they are analyzed. Upon review of laboratory analysis, the following asbestos containing materials can be found in Table 1. All suspect ACM samples that were analyzed and did not contain asbestos can be found in Table 2.

| Table 1. Asbestos Containing Materials | | | | | |
|---|---|---|---|---|---|
| Sample # | Material Description | Locations | Friability (Friable, NF Cat I NF Cat II) | Condition | Sample Results (% Asbestos) |
| 02-01 | Roll Sheet Vinyl Floor | Bath 1 | NF Cat I | Damaged | 15% Chrysotile |
| | | | | | |
| | | | | | |

| Table 2. Non – Asbestos Containing Materials | | | | |
|---|---|---|---|---|
| Sample # | Material Description | Locations | Condition | Sample Results (% Asbestos) |
| 01-01 | Roll Sheet Vinyl Floor | Laundry | Damaged | Asbestos Not Present |
| 03-01 | Roll Sheet Vinyl Floor | Bath 2 | Damaged | Asbestos Not Present |
| 04-01 | Roll Sheet Vinyl Floor | Bedroom 2 | Damaged | Asbestos Not Present |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

## V. CONCLUSIONS

Asbestos is not always an immediate hazard. Intact and undisturbed ACM does not pose a health risk. They may, however become a health hazard if they are damaged, disturbed, or deteriorate over time and release fibers into the air. There are no federal, state, or Tribal laws mandating asbestos removal. It is only when the material can no longer be maintained in good condition and/or airborne concentrations of asbestos are measured and found to be above a permissible exposure limit (PEL), or when the building is to be demolished or renovated, that removal may become necessary. Any renovation/demolition work which may impact these positive materials should be conducted in accordance with all applicable Federal, state, and local regulations.

QUANTEM LABORATORIES
2033 HERITAGE PARK DR, OKLAHOMA CITY, OK 73120 | 1.800.822.1650

# Polarized Light Microscopy Asbestos Analysis Report

QuanTEM Lab No. 378895
Account Number: C162
Date Received: 05/06/2025
Received By: Charlie Johnson
Date Analyzed: 05/08/2025
Analyzed By: Tanner Smith
Methodology: EPA/600/R-93/116

Client: Cherokee Nation Environmental Programs
Logan Girty
PO Box 948
Tahlequah, OK 74464

Project: Theda Rowan
Project Location: Ft.Gibson
Project Number: NA

| QuanTEM Sample ID | Client Sample ID | Composition | Color / Description | Asbestos (%) | Non-Asbestos Fiber (%) | Non Fibrous |
|---|---|---|---|---|---|---|
| 001 | 01-01 | Layered | Gray Flooring | Asbestos Not Present | Glass Fiber 5 | Vinyl Foam CaCO3 |
| 001a | | Layered | Tan Mastic | Asbestos Not Present | NA | Glue Binder |
| 002 | 02-01 | Layered | White/Tan Flooring | Asbestos Present Chrysotile 15 | NA | Binder Vinyl CaCO3 |
| 002a | | Layered | Brown Mastic | Asbestos Not Present | NA | Glue |
| 003 | 03-01 | Layered | Gray/Brown Flooring | Asbestos Not Present | NA | Vinyl Foam CaCO3 |
| 003a | | Layered | Clear Mastic | Asbestos Not Present | NA | Glue |

Unless otherwise noted, upon receipt the condition of the sample was acceptable for analysis.

QUANTEM LABORATORIES
2033 HERITAGE PARK DR, OKLAHOMA CITY, OK 73120 | 1.800.822.1650

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| QuanTEM Sample ID | Client Sample ID | Composition | Color / Description | Asbestos (%) | Non-Asbestos Fiber (%) | | Non Fibrous |
|---|---|---|---|---|---|---|---|
| 003b | | Layered | Gray<br>Leveling Compound | Asbestos Not Present | Cellulose | 12 | CaCO3 |
| 003c | | Layered | Gray<br>Flooring | Asbestos Not Present | NA | | Vinyl<br>Binder<br>CaCO3 |
| 004 | 04-01 | Layered | Tan/White<br>Flooring | Asbestos Not Present | Cellulose<br>Glass Fiber | 15<br>5 | Vinyl<br>Binder |
| 004a | | Layered | Brown<br>Mastic | Asbestos Not Present | NA | | Glue |

Tanner Smith

Tanner Smith, Laboratory Analyst

5/8/2025
Date of Report

Unless otherwise noted, upon receipt the condition of the sample was acceptable for analysis.

# ASBESTOS CHAIN OF CUSTODY

QuanTEM LABORATORIES
www.QuanTEM.com
2033 Heritage Park Drive, Oklahoma City, OK 73120-7502
(800) 822-1650 • (405) 755-7272 • Fax: (405) 755-2058

**LEGAL DOCUMENT - PLEASE PRINT LEGIBLY**



For Lab Use Only
Lab No. 378895
Accept Reject

| Contact Information | | | |
|---|---|---|---|
| Company: Cherokee Nation Environmental Programs | Phone: (918) 453-6140 | Project Name: Theda Rowan | Report Results (☑ one box) |
| Contact: Logan Girty | Cell Phone: (918) 772-8346 | Project Location: Ft.Gibson | ☐ QuanTEM Website |
| Account #: C 162 | E-mail: logan-girty@cherokee.org | Project ID: | ☑ Email logan-girty@cherokee.org |
| SAMPLED BY: Name: Logan Girty | Date: 4/30/2025 | P.O. Number: 896007 | ☐ Other |

| RELINQUISHED BY | DATE & TIME | VIA | RECEIVED BY | DATE & TIME |
|---|---|---|---|---|
| | 4/30/25 @ 5 PM | FedEx | | 5/6/25 1025AM |

REQUESTED SERVICES (Please ☑ the Appropriate Boxes)

| PLM | PLM | TEM | TEM | TURNAROUND TIME |
|---|---|---|---|---|
| ☑ Bulk Analysis (EPA 600/R-93/116) | ☐ Vermiculite Attic Insulation (EPA 600/R-04/004) | ☐ Air- AHERA | ☐ Bulk- Presence / Absence EPA600/R-93/116 | ☐ Rush |
| ☐ 400 Point Count | ☐ Other | ☐ Air- NIOSH 7402 | ☐ Bulk- Quantitative [weight%]- Chatfield | ☐ Same Day |
| ☐ 1000 Point Count | PCM | ☐ Air- ISO 10312 | ☐ Dust- Presence / Absence | ☐ 24 - Hour |
| ☐ Gravimetric Preparation | ☐ NIOSH 7400 | ☐ Drinking Water- EPA 100.2 | ☐ Dust- Quantitative [fibers/sq.cm]- ASTM D5755 | ☑ 3 - Day |
| ☐ Particle ID | | ☐ Waste Water- EPA 600/4-83-043 | ☐ Other | ☐ 5 - Day |

| No. | Sample ID (10 Characters Max) | ☑ To Be Analyzed | Color | Description | Volume / Area (as applicable) | Comments / Notes |
|---|---|---|---|---|---|---|
| 1 | 01-01 | ☑ | Grey | RS Vinyl Floor | | Laundry |
| 2 | 02-01 | ☑ | White/Tan | RS Vinyl Floor | | Bath1 |
| 3 | 03-01 | ☑ | Grey/Brown | RS Vinyl Floor (upper/lower) | | Bath 2 |
| 4 | 04-01 | ☑ | Tan/Speckled | RS Vinyl Floor | | Bedroom 2 |
| 5 | | ☐ | | | | |
| 6 | | ☐ | | | | |
| 7 | | ☐ | | | | |
| 8 | | ☐ | | | | |
| 9 | | ☐ | | | | |
| 10 | | ☐ | | | | |

SATURDAY FEDEX SAMPLE DELIVERY - CALL TO SCHEDULE • Use this address for Saturday Delivery only: 4220 N. Santa Fe Ave., Oklahoma City, OK 73105-8517 • Mark Package "Hold for Saturday Pickup"
Please Note - UPS and USPS are NOT available for Saturday Delivery