

**CHEROKEE NATION**  
**Environmental Programs**



**Asbestos Sampling Report**

**PARTICIPANT:** DAVIS, BARBARA

**PREPARED BY:** Tim Miller **DATE:** 6/30/2025  
TIMOTHY MILLER, ENVIRONMENTAL SPECIALIST I

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

## TABLE OF CONTENTS

- I. SITE INSPECTION/DESCRIPTION
- II. BACKGROUND
- III. FIELD PROCEDURES AND ANALYTICAL METHODS
- IV. SUMMARY OF FINDINGS
- V. CONCLUSIONS

APPENDIX A: PROJECT SCOPE OF WORK

APPENDIX B: LABORATORY REPORT & CHAIN OF CUSTODY

## 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:

Barbara Davis  
15396 W. Meadow View Ln. Tahlequah, OK 74464  
405-777-6643  
Coordinates: 35.84526, -95.03105

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:

Timothy Miller, AHERA Inspector

The sampling was conducted on **June 23, 2025** at the request of the Cherokee Nation Housing Rehabilitation Department.

The site is a single family home built in **1978**. 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 (cementitious 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 ft<sup>2</sup> – Minimum 3 samples
- From 1000-5000 ft<sup>2</sup> – Minimum 5 samples
- Greater than 5000 ft<sup>2</sup> – 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 from 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, cementitious 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 of one per suspect homogeneous area.
- Collect samples from inconspicuous locations.
- Material such as cementitious 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 29 samples were analyzed from 14 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/ 02-03	Ceiling Texture	Bathroom 1	Friable	Significant ly Damaged	4
12-01	White Caulk	Exterior Window South Side	Friable	Significant Damaged	5
14-01	Gray Caulk	Exterior Window NE Bedroom	NF Cat II	Damaged	10

**Table 2. Non – Asbestos Containing Materials**

Sample #	Material Description	Locations	Condition	Sample Results (% Asbestos)
01-01/ 01-03	White Joint Compound	Bathroom 1	Damaged	<1
03-01	Red Wall Tile	Bathroom 1	Good	None Detected
04-01	Brown Flooring	Bathroom 1	Damaged	None Detected
05-01	White & Red/Black Flooring	Bathroom 1	Damaged	None Detected
06-01	White Caulk	Bathroom 1	Damaged	None Detected
07-01	White Caulk	Bathroom 1	Damaged	None Detected
08-01	Black Wall Tile	Bathroom 1	Good	None Detected
09-01	Blue Drywall	Bathroom 1 Above Shower	Damaged	None Detected
10-01	White Caulk	Living Room French Doors	Damaged	None Detected
11-01	Red Brick	Front Steps	Significant Damage	None Detected
13-01	White Caulk	Living Room Door Exterior	Significant Damage	None Detected

## 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





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

## Polarized Light Microscopy Asbestos Analysis Report

Quantem Lab No. 380397

Account Number: C162

Date Received: 06/25/2025

Received By: Charlie Johnson

Date Analyzed: 06/26/2025

Analyzed By: Tanner Smith

Methodology: EPA/600/R-93/116

Client: Cherokee Nation Environmental Programs  
Timothy Miller

Project: Barbara Davis

Project Location: Tahlequah

Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
001	01-01	Homogeneous	White Joint Compound	Asbestos Present Chrysotile <1	NA	CaCO3
002	01-02	Layered	White Joint Compound	Asbestos Present Chrysotile <1	NA	CaCO3
002a		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
003	01-03	Layered	White Joint Compound	Asbestos Present Chrysotile <1	NA	CaCO3
003a		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
004	02-01	Homogeneous	White Texture	Asbestos Present Chrysotile 4	NA	CaCO3 Foam Paint
005	02-02	Homogeneous	White Texture	Asbestos Present Chrysotile 4	NA	CaCO3 Foam Paint

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

Quantem is a NVLAP accredited Testing PLM laboratory (Lab Code: 101959-0). This report relates only to the specific items tested.  
NVLAP accreditation applies only to analysis performed utilizing EPA—40 CFR Appendix E to Subpart E of Part 763 and EPA/600/R-93/116 methods.  
This report may not be used to claim product endorsement by NVLAP or any agency of the US Government.  
This report may not be reproduced except in full, without the written approval of the laboratory.



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

## Polarized Light Microscopy Asbestos Analysis Report

Quantem Lab No. 380397

Account Number: C162

Client: Cherokee Nation Environmental Programs  
Timothy Miller

Date Received: 06/25/2025

Received By: Charlie Johnson

Date Analyzed: 06/26/2025

Analyzed By: Tanner Smith

Methodology: EPA/600/R-93/116

Project: Barbara Davis

Project Location: Tahlequah

Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
006	02-03	Layered	White Texture	Asbestos Present Chrysotile 4	NA	CaCO3 Foam Paint
006a		Layered	White Joint Compound	Asbestos Not Present	NA	CaCO3
006b		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
007	03-01	Layered	Red Tile	Asbestos Not Present	NA	Clay Sand
007a		Layered	White Grout	Asbestos Not Present	NA	CaCO3 Binder
007b		Layered	Tan Mastic	Asbestos Not Present	NA	Glue

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

Quantem is a NVLAP accredited Testing PLM laboratory (Lab Code: 101959-0). This report relates only to the specific items tested.  
NVLAP accreditation applies only to analysis performed utilizing EPA—40 CFR Appendix E to Subpart E of Part 763 and EPA/600/R-93/116 methods.  
This report may not be used to claim product endorsement by NVLAP or any agency of the US Government.  
This report may not be reproduced except in full, without the written approval of the laboratory.





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

## Polarized Light Microscopy Asbestos Analysis Report

Quantem Lab No. 380397

Account Number: C162

Date Received: 06/25/2025

Received By: Charlie Johnson

Date Analyzed: 06/26/2025

Analyzed By: Tanner Smith

Methodology: EPA/600/R-93/116

Client: Cherokee Nation Environmental Programs  
Timothy Miller

Project: Barbara Davis

Project Location: Tahlequah

Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
008	04-01	Homogeneous	Brown Flooring	Asbestos Not Present	NA	Vinyl CaCO <sub>3</sub> Foam
009	05-01	Layered	White Flooring	Asbestos Not Present	Cellulose 20 Synthetic 5	Binder CaCO <sub>3</sub>
009a		Layered	Tan Mastic	Asbestos Not Present	NA	Glue
009b		Layered	Red/Black Flooring	Asbestos Not Present	Cellulose 20 Glass Fiber 5	Binder CaCO <sub>3</sub>
009c		Layered	Tan Mastic	Asbestos Not Present	NA	Glue Binder
010	06-01	Homogeneous	White Caulk	Asbestos Not Present	NA	Glue Binder
011	07-01	Homogeneous	White Caulk	Asbestos Not Present	NA	Glue Binder

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

Quantem is a NVLAP accredited Testing PLM laboratory (Lab Code: 101959-0). This report relates only to the specific items tested. NVLAP accreditation applies only to analysis performed utilizing EPA—40 CFR Appendix E to Subpart E of Part 763 and EPA/600/R-93/116 methods. This report may not be used to claim product endorsement by NVLAP or any agency of the US Government. This report may not be reproduced except in full, without the written approval of the laboratory.



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

## Polarized Light Microscopy Asbestos Analysis Report

QuanTEM Lab No. 380397	Client: Cherokee Nation Environmental Programs
Account Number: C162	Timothy Miller
Date Received: 06/25/2025	
Received By: Charlie Johnson	
Date Analyzed: 06/26/2025	Project: Barbara Davis
Analyzed By: Tanner Smith	Project Location: Tahlequah
Methodology: EPA/600/R-93/116	Project Number: NA

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
012	08-01	Layered	Black Tile	Asbestos Not Present	NA	Clay Sand
012a		Layered	White Grout	Asbestos Not Present	NA	CaCO3 Binder
013	09-01	Homogeneous	Blue Drywall	Asbestos Not Present	Cellulose Glass Fiber	10 Gypsum 2
014	10-01	Homogeneous	White Caulk	Asbestos Not Present	NA	Glue Binder
015	11-01	Layered	Red Brick	Asbestos Not Present	NA	Clay
015a		Layered	Gray Mortar	Asbestos Not Present	NA	CaCO3 Sand

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

Quantem is a NVLAP accredited Testing PLM laboratory (Lab Code: 101959-0). This report relates only to the specific items tested. NVLAP accreditation applies only to analysis performed utilizing EPA—40 CFR Appendix E to Subpart E of Part 763 and EPA/600/R-93/116 methods. This report may not be used to claim product endorsement by NVLAP or any agency of the US Government. This report may not be reproduced except in full, without the written approval of the laboratory.





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

### Polarized Light Microscopy Asbestos Analysis Report

Quantem Lab No. 380397

Account Number: C162

Client: Cherokee Nation Environmental Programs  
Timothy Miller

Date Received: 06/25/2025

Received By: Charlie Johnson

Date Analyzed: 06/26/2025

Analyzed By: Tanner Smith

Methodology: EPA/600/R-93/116

Project: Barbara Davis

Project Location: Tahlequah

Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
016	12-01	Homogeneous	White Caulk	Asbestos Present Chrysotile 5	NA	CaCO3 Binder
017	13-01	Homogeneous	White Caulk	Asbestos Not Present	NA	Glue Binder
018	14-01	Homogeneous	Gray Caulk	Asbestos Present Chrysotile 10	NA	Tar

Tanner Smith, Laboratory Analyst

6/26/2025

Date of Report

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

Quantem is a NVLAP accredited Testing PLM laboratory (Lab Code: 101959-0). This report relates only to the specific items tested. NVLAP accreditation applies only to analysis performed utilizing EPA—40 CFR Appendix E to Subpart E of Part 763 and EPA/600/R-93/116 methods. This report may not be used to claim product endorsement by NVLAP or any agency of the US Government. This report may not be reproduced except in full, without the written approval of the laboratory.





## ASBESTOS CHAIN OF CUSTODY

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. <u>380397</u>
Accept <input type="checkbox"/> Reject <input type="checkbox"/>

Report Results ( <input checked="" type="checkbox"/> one box)
<input type="checkbox"/> QuanTEM Website
<input checked="" type="checkbox"/> Email <u>timothy-miller@cherokee.org</u>
<input type="checkbox"/> Other _____

Contact Information		Project Information	
Company: Cherokee Nation Environmental Programs	Phone: (918) 207-4934	Project Name: Barbara Davis	
Contact: Timothy Miller	Cell Phone: (918) 570-9545	Project Location: Tahlequah	
Account #: C 162	E-mail: <u>timothy-miller@cherokee.org</u>	Project ID: _____	
SAMPLED BY: Name: Timothy Miller	Date: 06/23/2025	P.O. Number: 896007	

RELINQUISHED BY	DATE & TIME	VIA	RECEIVED BY	DATE & TIME
Timothy Miller	06/23/25/ 3PM	Fedex		6/25/25 930

#### REQUESTED SERVICES (Please ☒ the Appropriate Boxes)

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

No.	Sample ID (10 Characters Max)	To Be Analyzed <input checked="" type="checkbox"/>	Color	Description	Volume / Area (as applicable)	Comments / Notes
1	01-01	<input checked="" type="checkbox"/>	White	Drywall/Joint Compound		Bathroom Walls
2	01-02	<input checked="" type="checkbox"/>	White	Drywall/Joint Compound		Bathroom Walls
3	01-03	<input checked="" type="checkbox"/>	White	Drywall/Joint Compound		Bathroom Walls
4	02-01	<input checked="" type="checkbox"/>	White	Drywall/Joint Compound/Ceiling Texture		Bathroom Ceiling
5	02-02	<input checked="" type="checkbox"/>	White	Drywall/Joint Compound/Ceiling Texture		Bathroom Ceiling
6	02-03	<input checked="" type="checkbox"/>	White	Drywall/Joint Compound/Ceiling Texture		Bathroom Ceiling
7	03-01	<input checked="" type="checkbox"/>	Red	Tile/Grout		Bathroom Walls
8	04-01	<input checked="" type="checkbox"/>	Brown	Flooring		Bathroom Floor
9	05-01	<input checked="" type="checkbox"/>	White	Roll Sheet Flooring		Bathroom Floor
10	06-01	<input checked="" type="checkbox"/>	White	Caulk		Bathroom Vanity





# ASBESTOS CHAIN OF CUSTODY

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. <u>380597</u>
Accept <input type="checkbox"/> Reject <input type="checkbox"/>

Project Information						
Company: Cherokee Nation Environmental Programs			Project Name: Barbara Davis			
			Project Location: Tahlequah			
No.	Sample ID (10 Characters Max)	<input checked="" type="checkbox"/> To Be Analyzed	Color	Description	Volume / Area (as applicable)	Comments / Notes
11	07-01	<input checked="" type="checkbox"/>	White	Caulk		Shower
12	08-01	<input checked="" type="checkbox"/>	Black	Tile/Grout		Bathroom Walls
13	09-01	<input checked="" type="checkbox"/>	Blue	Drywall		Above Shower
14	10-01	<input checked="" type="checkbox"/>	White	Caulk		Living Room French Doors
15	11-01	<input checked="" type="checkbox"/>	Red/Gray	Brick/Mortar		Front Steps
16	12-01	<input checked="" type="checkbox"/>	White	Caulk		Exterior Window Garage
17	13-01	<input checked="" type="checkbox"/>	White	Caulk		Exterior French Door
18	14-01	<input checked="" type="checkbox"/>	Gray	Caulk		Exterior Window NE Bedroom
19		<input type="checkbox"/>				
20		<input type="checkbox"/>				
21		<input type="checkbox"/>				
22		<input type="checkbox"/>				
23		<input type="checkbox"/>				
24		<input type="checkbox"/>				
25		<input type="checkbox"/>				
26		<input type="checkbox"/>				
27		<input type="checkbox"/>				
28		<input type="checkbox"/>				
29		<input type="checkbox"/>				
30		<input type="checkbox"/>				