

CHEROKEE NATION
Environmental Programs



Asbestos Sampling Report

PARTICIPANT: HILL, ANNA

PREPARED BY: Logan Girty **DATE:** 4/29/2025
LOGAN GIRTY. ENVIRONMENTAL SPECIALIST III

REQUESTED BY: HACN HOUSING REHABILITATION –
JAMIE WALTERS

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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:

Anna Hill
332 N Sycamore, Nowata, OK 74048
918-440-6260
Coordinates: 36.7043 / -95.6326

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 15, 2025 at the request of the Cherokee Nation Housing Rehabilitation Department.

The site is a single family home built in 1960. 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 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 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 or 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 24 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)
24-01	Transite Siding	Exterior	NF Cat II	Damaged	20% Chrysotile

Table 2. Non – Asbestos Containing Materials				
Sample #	Material Description	Locations	Condition	Sample Results (% Asbestos)
	See Attached Lab Report			

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.



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Polarized Light Microscopy Asbestos Analysis Report

Quantem Lab No. 378531

Account Number: C162

Date Received: 04/23/2025

Received By: Charlie Johnson

Date Analyzed: 04/25/2025

Analyzed By: Cassie Sanborn

Methodology: EPA/600/R-93/116

Client: Cherokee Nation Environmental Programs

Logan Girty

PO Box 948

Tahlequah, OK 74464

Project: Anna Hill

Project Location: Nowata

Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
001	01-01	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 90	Paint
002	02-01	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 50 Glass Fiber 30	Perlite Paint
003	03-01	Layered	White Texture	Asbestos Not Present	NA	CaCO3 Paint
003a		Layered	White Joint Compound	Asbestos Not Present	NA	CaCO3
003b		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
004	03-02	Layered	White Joint Compound	Asbestos Not Present	NA	CaCO3 Paint
004a		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum

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.
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Polarized Light Microscopy Asbestos Analysis Report

Quantem Lab No. 378531	Client: Cherokee Nation Environmental Programs
Account Number: C162	Logan Girty
Date Received: 04/23/2025	PO Box 948
Received By: Charlie Johnson	Tahlequah, OK 74464
Date Analyzed: 04/25/2025	Project: Anna Hill
Analyzed By: Cassie Sanborn	Project Location: Nowata
Methodology: EPA/600/R-93/116	Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
005	04-01	Layered	White Texture	Asbestos Not Present	NA	CaCO3 Paint
005a		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
006	04-02	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Gypsum Paint
007	04-03	Layered	White Texture	Asbestos Not Present	NA	CaCO3 Paint
007a		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
008	05-01	Homogeneous	Green Ceiling Texture	Asbestos Not Present	NA	CaCO3 Paint

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Analyzed By: Cassie Sanborn	Project Location: Nowata
Methodology: EPA/600/R-93/116	Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
009	05-02	Homogeneous	Tan Ceiling Texture	Asbestos Not Present	NA	CaCO3 Paint
010	05-03	Homogeneous	Green Ceiling Texture	Asbestos Not Present	NA	CaCO3 Paint
011	06-01	Layered	White Sheet Vinyl	Asbestos Not Present	Cellulose 20	CaCO3 Vinyl
011a		Layered	Black Tar Paper	Asbestos Not Present	Cellulose 60	Tar
012	07-01	Layered	Gray Sheet Vinyl	Asbestos Not Present	Cellulose 15 Glass Fiber 5	CaCO3 Vinyl
012a		Layered	Yellow Mastic	Asbestos Not Present	NA	Glue
013	08-01	Homogeneous	White Caulk	Asbestos Not Present	NA	Silicone

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Date Analyzed: 04/25/2025	Project: Anna Hill
Analyzed By: Cassie Sanborn	Project Location: Nowata
Methodology: EPA/600/R-93/116	Project Number: NA

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
014	09-01	Homogeneous	White Caulk	Asbestos Not Present	NA	CaCO3 Binder
015	10-01	Layered	Brown Formica	Asbestos Not Present	Cellulose 80	Binder
015a		Layered	Green Mastic	Asbestos Not Present	NA	Glue
016	11-01	Layered	White Wainscot	Asbestos Not Present	Cellulose 90	Paint
016a		Layered	White Caulk	Asbestos Not Present	NA	CaCO3 Binder
017	12-01	Homogeneous	White Caulk	Asbestos Not Present	NA	CaCO3 Binder

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Analyzed By: Cassie Sanborn

Methodology: EPA/600/R-93/116

Client: Cherokee Nation Environmental Programs

Logan Girty

PO Box 948

Tahlequah, OK 74464

Project: Anna Hill

Project Location: Nowata

Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
018	13-01	Layered	White Joint Compound	Asbestos Not Present	NA	CaCO ₃ Paint
018a		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
019	14-01	Layered	Tan Sheet Vinyl	Asbestos Not Present	Cellulose 15 Glass Fiber 5	CaCO ₃ Vinyl
019a		Layered	White Caulk	Asbestos Not Present	NA	CaCO ₃ Binder
019b		Layered	Yellow Mastic	Asbestos Not Present	NA	Glue
020	15-01	Layered	White Wainscot	Asbestos Not Present	Cellulose 90	Paint
020a		Layered	White Caulk	Asbestos Not Present	NA	CaCO ₃ Binder

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PO Box 948

Tahlequah, OK 74464

Project: Anna Hill

Project Location: Nowata

Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
021	16-01	Homogeneous	White Caulk	Asbestos Not Present	NA	CaCO3 Binder
022	17-01	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
023	17-02	Layered	White Texture	Asbestos Not Present	NA	Gypsum Paint
023a		Layered	Beige Joint Compound	Asbestos Not Present	NA	CaCO3
023b		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
024	17-03	Layered	White Texture	Asbestos Not Present	NA	Gypsum

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Date Analyzed: 04/25/2025	Project: Anna Hill
Analyzed By: Cassie Sanborn	Project Location: Nowata
Methodology: EPA/600/R-93/116	Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
024a		Layered	Beige Joint Compound	Asbestos Not Present	NA	CaCO ₃
024b		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
025	18-01	Homogeneous	White Caulk	Asbestos Not Present	NA	CaCO ₃ Binder
026	20-01	Layered	Black/Brown Shingle	Asbestos Not Present	Glass Fiber 20	Tar Sand CaCO ₃
026a		Layered	Black Tar	Asbestos Not Present	NA	Tar
027	21-01	Homogeneous	Gray Mortar	Asbestos Not Present	NA	CaCO ₃ Sand
028	23-01	Homogeneous	Gray Mortar	Asbestos Not Present	NA	CaCO ₃ Sand

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Client: Cherokee Nation Environmental Programs

Logan Girty

PO Box 948

Tahlequah, OK 74464

Project: Anna Hill

Project Location: Nowata

Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
029	24-01	Homogeneous	Green Siding	Asbestos Present Chrysotile 20	NA	CaCO3 Sand Paint

Cassie Sanborn

Cassie Sanborn, Laboratory Analyst

4/25/2025

Date of Report

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Page 1 of 2

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Lab No. 328531

Accept ☒ Reject ☐

Contact Information		Project Information	
Company:	Cherokee Nation Environmental Programs	Project Name:	Anna Hill
Contact:	Logan Girty	Project Location:	Nowata
Account #:	C 162	Project ID:	
SAMPLED BY:	Name: Logan Girty	P.O. Number:	896007
	Phone: (918) 453-6140		
	Cell Phone: (918) 772-8346		
	Email: logan-girty@cherokee.org		
	Date: 4/15/2025		

RELINQUISHED BY	DATE & TIME	VIA	RECEIVED BY	DATE & TIME
<i>Logan E. Girty</i>	4/16/25 @ 5PM	FedEx	<i>[Signature]</i>	4/23/26 900AM

REQUESTED SERVICES (Please check the appropriate boxes)

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

No.	Sample ID (10 Characters Max)	To Be Analyzed	Color	Description	Volume / Area (as applicable)	Comments / Notes
1	01-01	<input checked="" type="checkbox"/>	White	Ceiling Tile (texture)		Living Rm
2	02-01	<input checked="" type="checkbox"/>	White	Ceiling Tile (smooth)		Living Rm
3	03-01	<input checked="" type="checkbox"/>	Pink	Drywall Ceiling		Bedroom 1
4	03-02	<input checked="" type="checkbox"/>	White/Green	Drywall Ceiling Joint Compound		Bedroom 1
5	04-01	<input checked="" type="checkbox"/>	White	Ceiling/Wall Texture		Bath/Foyer
6	04-02	<input checked="" type="checkbox"/>	White	Ceiling/Wall Texture		Bath/Foyer
7	04-03	<input checked="" type="checkbox"/>	White	Ceiling/Wall Texture		Bath/Foyer
8	05-01	<input checked="" type="checkbox"/>	Green	Ceiling Texture		Utility/Laundry
9	05-02	<input checked="" type="checkbox"/>	Green	Ceiling Texture		Utility/Laundry
10	05-03	<input checked="" type="checkbox"/>	Green	Ceiling Texture		Utility/Laundry

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



ASBESTOS CHAIN OF CUSTODY

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

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Lab No. <u>378531</u>
Accept <input type="checkbox"/> Reject <input type="checkbox"/>

Project Information						
Company: Cherokee Nation Environmental Programs			Project Name: Anna Hill		Project Location: Nowata	
No.	Sample ID (10 Characters Max)	<input checked="" type="checkbox"/> To Be Analyzed	Color	Description	Volume / Area (as applicable)	Comments / Notes
11	06-01	<input checked="" type="checkbox"/>	White	RS Vinyl Floor		Laundry
12	07-01	<input checked="" type="checkbox"/>	Grey	RS Vinyl Floor		Kitchen/Bath
13	08-01	<input checked="" type="checkbox"/>	White	Shower Caulk		Bath
14	09-01	<input checked="" type="checkbox"/>	White	Door Trim Caulk		Bath
15	10-01	<input checked="" type="checkbox"/>	Brown	Formica		Kitchen
16	11-01	<input checked="" type="checkbox"/>	White	Wainscot		Kitchen
17	12-01	<input checked="" type="checkbox"/>	White	Window Caulk		Throughout
18	13-01	<input checked="" type="checkbox"/>	White	Drywall Joint Compound		HVAC Closet
19	14-01	<input checked="" type="checkbox"/>	Tan	RS Vinyl Floor		Entry
20	15-01	<input checked="" type="checkbox"/>	White	Wainscot		Bath
21	16-01	<input checked="" type="checkbox"/>	White	Caulk (crown molding)		Bath
22	17-01	<input checked="" type="checkbox"/>	Beige	Drywall Texture		Bath/Utility
23	17-02	<input checked="" type="checkbox"/>	Beige	Drywall Texture		Bath/Utility
24	17-03	<input checked="" type="checkbox"/>	Beige	Drywall Texture		Bath/Utility
25	18-01	<input checked="" type="checkbox"/>	White	Window Caulk		Exterior
26	20-01	<input checked="" type="checkbox"/>	Black/Brown	Shingle		Roof
27	21-01	<input checked="" type="checkbox"/>	Grey	Brick Mortar		Exterior
28	23-01	<input checked="" type="checkbox"/>	Grey	Mortar Patch		Exterior
29	24-01	<input checked="" type="checkbox"/>	Green	Transite Siding		Exterior
30		<input type="checkbox"/>				