CHEROKEE NATION
Environmental Programs

Asbestos Sampling Report

PARTICIPANT: GOUDEAU, CHARLES

PREPARED BY: _____ **DATE:** 9/2/2025
TIMOTHY MILLER, ENVIRONMENTAL SPECIALIST I

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:

Charles Goudeau
5023 Osage Dr. Tulsa, OK 74126
918-645-8667
Coordinates: 36.22643, -96.00092

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

The site is a single family home built in 1980. 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 26 samples were analyzed from 8 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)
03-01	Green/Yellow Flooring	Bathroom 2	NF Cat I	Damaged	20
04-01 through 04-03	White Joint Compound/Wall Texture	Bathroom 2 and Adjacent Walls	Friable	Damaged	2

Table 2. Non – Asbestos Containing Materials				
Sample #	Material Description	Locations	Condition	Sample Results (% Asbestos)
01-01	Black Vinyl Tile	Master Bedroom	Good	None Detected
02-01	Striped Wallpaper	Master Bedroom and Bathroom 2	Good	None Detected
05-01	White Shower Caulk	Bathroom 2	Damaged	None Detected
06-01 Through 06-03	Ceiling Texture	Master Bedroom and Bathroom 2	Damaged	None Detected
07-01	Beige Wallpaper	Master Bedroom and Bathroom 2	Damaged	None Detected
08-01	Black Brick	Exterior	Damaged	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 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.

7021 W. Wilshire Blvd, Ste. B / Oklahoma City, OK 73132 / 405-755-7272

Polarized Light Microscopy Asbestos Analysis Report

QuanTEM Lab No. 382163
Account Number: C162

Client: Cherokee Nation Environmental Programs
Timothy Miller

Date Received: 08/20/2025
Received By: Charlie Johnson
Date Analyzed: 08/20/2025
Analyzed By: Tanner Smith
Methodology: EPA/600/R-93/116

Project: Charles Goudeau
Project Location: Tulsa
Project Number: NA

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
001	01-01	Layered	Black Floor Tile	Asbestos Not Present	NA	Vinyl CaCO3
001a		Layered	Yellow Mastic	Asbestos Not Present	NA	Glue
002	02-01	Homogeneous	Multi-Color Wall Paper	Asbestos Not Present	Cellulose 80	Binder
003	03-01	Layered	Brown Carpet	Asbestos Not Present	Synthetic 90	Binder
003a		Layered	Cream Mastic	Asbestos Not Present	NA	Glue
003b		Layered	Yellow/Green Flooring	Asbestos Present Chrysotile 20	Cellulose 5	Binder
003c		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.

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Project Number: NA

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
004	04-01	Layered	White Texture	Asbestos Not Present	NA	CaCO3 Paint
004a		Layered	White Sheetrock	Asbestos Not Present	Cellulose 10	Gypsum
005	04-02	Layered	White Texture	Asbestos Not Present	NA	CaCO3 Paint
005a		Layered	White Sheetrock	Asbestos Not Present	Cellulose 10	Gypsum
006	04-03	Layered	White Texture	Asbestos Not Present	NA	CaCO3 Paint
006a		Layered	White Joint Compound	Asbestos Present Chrysotile 2	NA	Gypsum

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Project Number: NA

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006b		Layered	White Sheetrock	Asbestos Not Present	Cellulose 10	Gypsum
007	05-01	Layered	White Caulk	Asbestos Not Present	NA	Glue Binder
007a		Layered	White Texture	Asbestos Not Present	NA	CaCO3 Paint
008	06-01	Layered	White Texture	Asbestos Not Present	NA	CaCO3 Paint
008a		Layered	White Sheetrock	Asbestos Not Present	Cellulose 10	Gypsum
009	06-02	Layered	White Texture	Asbestos Not Present	NA	CaCO3 Paint
009a		Layered	White Joint Compound	Asbestos Not Present	NA	CaCO3

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Project Location: Tulsa
Project Number: NA

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
010	06-03	Layered	White Texture	Asbestos Not Present	NA	CaCO3 Paint
010a		Layered	White Sheetrock	Asbestos Not Present	Cellulose 10	Gypsum
011	07-01	Homogeneous	Beige Wall Paper	Asbestos Not Present	Cellulose 60	Binder CaCO3
012	08-01	Layered	Black Brick	Asbestos Not Present	NA	Clay Sand Binder
012a		Layered	Gray Mortar	Asbestos Not Present	NA	CaCO3 Sand
012b		Layered	White Coating	Asbestos Not Present	NA	CaCO3

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Methodology: EPA/600/R-93/116

Project: Charles Goudeau
Project Location: Tulsa
Project Number: NA

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous

Tanner Smith

Tanner Smith, Laboratory Analyst

8/20/2025
Date of Report

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

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This report may not be used to claim product endorsement by NVLAP or any agency of the US Government.

ASBESTOS CHAIN OF CUSTODY

QuanTEM LABORATORIES
www.QuanTEM.com
7021 W. Wilshire Blvd, Suite B, Oklahoma City, OK 73132
(800) 822-1650 • (405) 755-7272 • Fax: (405) 755-2058

LEGAL DOCUMENT - PLEASE PRINT LEGIBLY

For Lab Use Only
Lab No. 382163
Accept Reject

Contact Information			
Company: Cherokee Nation Environmental Programs		Phone: (918) 207-4934	
Contact: Timothy Miller		Cell Phone: (918) 570-9545	
Account #: C 162		E-mail: timothy-miller@cherokee.org	
SAMPLED BY:	Name: Timothy Miller	Date: 08/15/2025	

Project Information	
Project Name:	Charles Goudeau
Project Location:	Tulsa
Project ID:	
P.O. Number:	895481

Report Results (☑ one box)	
☐	QuanTEM Website
☑	Email timothy-miller@cherokee.org
☐	Other _____

RELINQUISHED BY	DATE & TIME	VIA	RECEIVED BY	DATE & TIME
Timothy Miller	08/18/25@10AM	Fedex		

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	☑	Black	Vinyl Tile		Master Bedroom
2	02-01	☑	Striped	Wallpaper		Master Bedroom
3	03-01	☑	Brown	Flooring (Carpet/RSF)		Master Bathroom
4	04-01	☑	White	Wall Texture		Master Bed/Bath
5	04-02	☑	White	Wall Texture		Master Bed/Bath
6	04-03	☑	White	Wall Texture		Master Bed/Bath
7	05-01	☑	White	Shower Caulk		Master Bathroom
8	06-01	☑	White	Ceiling Texture		Master Bed/Bath
9	06-02	☑	White	Ceiling Texture		Master Bed/Bath
10	06-03	☑	White	Ceiling Texture		Master Bed/Bath

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

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(800) 822-1650 • (405) 755-7272 • Fax: (405) 755-2058

LEGAL DOCUMENT - PLEASE PRINT LEGIBLY

For Lab Use Only	
Lab No.	
Accept	Reject

Project Information		
Company: Cherokee Nation Environmental Programs	Project Name: Charles Goudeau	Project Location: Tulsa

No.	Sample ID (10 Characters Max)	☑ To Be Analyzed	Color	Description	Volume / Area (as applicable)	Comments / Notes
11	07-01	☑	Tan	Wallpaper		Master Bedroom
12	08-01	☑	Black	Brick		Exterior Walls (Add-on)
13		☐				
14		☐				
15		☐				
16		☐				
17		☐				
18		☐				
19		☐				
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25		☐				
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27		☐				
28		☐				
29		☐				
30		☐				

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