



CHEROKEE NATION Environmental Programs

LEAD-BASED PAINT INSPECTION & RISK ASSESSMENT REPORT

Conducted At:

124 S. Brewer Street
Vinita, OK 74301
36.6413, -95.1640
Built: 1942

Prepared For:

HACN Housing Rehabilitation - George Hubbard
Using ODEQ, EPA and CN Work Practice Standards
Established in 40 CFR 745-227

Inspected By:

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Report Date: June 17, 2026

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1.0 EXECUTIVE SUMMARY

A lead-based paint inspection was conducted at the Allison Kirby site on June 5, 2026, as requested by the Cherokee Nation Housing Rehabilitation Department. The inspection **confirmed the presence of lead** in amounts greater than or equal to 1.0 mg/cm² in paint, using the inspection protocol in Chapter 7 of the U.S. Department of Housing and Urban Development's (HUD) Guidelines for the Evaluation of Control of Lead-Based Paint Hazards in Housing (2012). A Risk Assessment was performed to fulfill the requirements for a federally assisted rehabilitation.

The full inspection report can be found in Appendix A (XRF Field Data Sheets). Building components that were unable to be tested with an XRF and are assumed positive include the following:

N/A

The following is a summary of the survey findings for the subject property:

Interior Lead-Based Paint

- Kitchen Door Casig, Wood Side C
- Laundry Door Header Trim, Wood A

Exterior Lead-Based Paint

- Soffit & Fascia, Wood (All)
- Window, Wood (All)
- Window Casing, Wood A&D
- Window-Sill, Wood C&D
- Window Trim, Wood A&B

Deteriorated Lead-Based Paint (Lead-Based Paint Hazards)

- Kitchen Door Casig, Wood Side C
- Soffit & Fascia, Wood (All)
- Window, Wood (All)
- Window Casing, Wood A&D
- Window-Sill, Wood C&D
- Window Trim, Wood A&B

Lead in Dust Hazards

- Laundry Window Sill
- Exterior Window Sill, Side B

Lead in Soil Hazards

- Composite Dripline Soil

This executive summary has been prepared for the convenience of the users of this report. This summary does not contain all the information presented in this report and, therefore, the entire report should be read to ensure all pertinent information is transmitted.

2.0 DISCLOSURE

A copy of this report or a summary of this report must be provided to new lessees (tenants) and purchasers of the property under Federal law (24 CFR part 35 and 40 CFR part 745) before they become obligated under a lease or sales contract. The complete report must also be provided to new purchasers and it must be made available to new tenants. Property owners (lessors) and sellers are also required to distribute an educational pamphlet approved by the US Environmental Protection Agency (EPA) and include standard warning language in their leases or sales contracts to ensure that parents have the information they need to protect their children from lead-based paint hazards

3.0 INSPECTION/ RISK ASSESSMENT METHODOLOGY

3.1 SURFACE-BY-SURFACE INSPECTION METHODOLOGY

A surface-by-surface lead-based paint inspection was performed to identify interior and exterior building components finished with lead-based paint. The inspection was performed inside the residence and on exterior surfaces of the residence using a portable X-Ray Fluorescence Analyzer (XRF). The inspection was limited to accessible painted and/or varnished surfaces. All substrates within inaccessible rooms are assumed positive for lead-based paint until access is available to prove otherwise.

The inspection was conducted in accordance with the EPA's work practice standards for conducting lead-based paint activities (40 CFR 745.227), HUD's Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (Guidelines) with the 2012 revisions. Samples were collected to represent component types; therefore, it should be assumed that similar component types in the rest of that room or room equivalent also contain lead-based paint. When standing in any four-sided room facing side A, which coincides with the front of the dwelling, side B will be to the right, side C will be to the rear, and side D will be to the left (clockwise from side A).

When evaluating this report it is assumed that, according to Chapter 7 HUD Guidelines, if one testing combination (i.e. window, door) is positive for lead in an interior or exterior room equivalent, all other similar testing combinations in those areas are assumed to be positive. The same is true for negative readings.

3.2 X-RAY FLUORESCENCE ANALYZER LEAD DETECTOR

The sampling strategy utilized to determine the presence of lead-based paint adheres to the EPA Performance Characteristic Sheet for the particular XRF instrument used, as well as the manufacturers' modifications and recommendations. The Viken PB200e lead x-ray fluorescence analyzer (Serial Number: 3177) was used for detection of building components finished with lead-based paint. The instrument was manufactured by Viken Detection, 21 North Avenue, Burlington, MA 01803. The radioactive source is cobalt-57 and was last resourced on May 25, 2024.

Samples may be classified as positive or negative. Positive results indicate lead in quantities greater than 1.0 mg/cm² and are considered lead-based paint. Negative results indicate lead in quantities less than 1.0 mg/cm² and are not considered lead-based paint.

3.3 RISK ASSESSMENT METHODOLOGY

The lead-based paint risk assessment was performed to determine if the lead-based paint present in the residence presents an immediate hazard. This was accomplished through combining measurements of lead in dust, surface-by-surface paint analysis, visual assessment of the residence, assessment of paint condition, and by collecting maintenance and management data to identify and address lead-based paint hazards.

The risk assessment was performed in accordance with the EPA's work practice standards for conducting lead-based paint activities (40 CFR 745.227), HUD's Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (Guidelines) with the 2012 revisions.

3.4 DESCRIPTION OF PAINT CONDITION HAZARD RANKINGS

The paint condition is placed into one of two categories using the risk assessor's professional judgment. These categories are intact or deteriorated. Type of deterioration may also be noted on surfaces in deteriorated condition. Based on the approximate surface area of deteriorated paint, the risk assessor then assesses the paint condition as intact or deteriorated. These conditions indicate the potential for lead hazards associated with paint condition and lead in household dust.

Hazard ranking protocol was performed in accordance with the HUD Guidelines for Evaluation and Control of Lead-Based Paint Hazards in Housing, dated July 2012, Chapter 5: Risk Assessment and Reevaluation; Identification of Deteriorated Paint (Form 5.2). This information is summarized below.

Deteriorated

EPA regulations define deteriorated paint as "any interior or exterior paint or other coating that is peeling, chipping, chalking, or cracking, or any paint or coating located on an interior or exterior surface or fixture that is otherwise damaged or separated from the substrate"(40 CFR 745.63).

3.5 LABORATORY ANALYSIS

Laboratory analysis of dust wipe/soil samples were performed by Pace Analytical (NVLLAP 101959-0), 7021 W Wilshire Blvd, Oklahoma City, OK 73120 Phone: 405-755-7272. Laboratory analysis of the dust wipes and soil samples are analyzed based on the EPA SW846-7420/ HUD – Flame Atomic Absorption.

4.0 DESCRIPTION OF RESULTS

This is a report of an X-ray Fluorescence (XRF) inspection and risk assessment to determine if lead-based paint exists in the readily accessible areas of this residence and tested components. The presence or absence of lead-based paint only applies to surfaces tested or assessed on the date of the field visit. According to HUD/EPA Guidelines, paint with concentrations of lead that exceed 1.0 mg/cm² must be considered a lead-based paint (LBP). However, detectable lead in quantities less than 1.0 mg/cm² may contribute to the development of lead dust hazards even though it is not considered a lead-based paint hazard.

4.1 LBP INSPECTION

Lead based paint was found on both the interior and exterior of the site. The positive readings are shown in the following table. The full report with all readings are in Appendix 1.

Reading #	Pb	Units	Room	Structure Member	Substrate	Wall	Condition
35	4.3	mg/cm2	Kitchen	Door Casing	Wood	C	Deteriorated
46	4.4	mg/cm2	Laundry Room	Door Header Trim	Wood	A	Intact
88	6.6	mg/cm2	Exterior	Soffit	Wood	A	Deteriorated
89	9	mg/cm2	Exterior	Fascia	Wood	A	Deteriorated
91	6.7	mg/cm2	Exterior	Window	Wood	A	Deteriorated
93	3.4	mg/cm2	Exterior	Window Casing	Wood	A	Deteriorated
95	4.8	mg/cm2	Exterior	Window Trim	Wood	A	Deteriorated
97	6.4	mg/cm2	Exterior	Window	Wood	B	Deteriorated
99	6.1	mg/cm2	Exterior	Window Trim	Wood	B	Deteriorated
104	5.2	mg/cm2	Exterior	Window Sill	Wood	D	Deteriorated
105	7.7	mg/cm2	Exterior	Window Casing	Wood	D	Deteriorated
106	6.1	mg/cm2	Exterior	Window	Wood	D	Deteriorated
108	3.9	mg/cm2	Exterior	Window	Wood	C	Deteriorated
109	1.2	mg/cm2	Exterior	Window Sill	Wood	C	Deteriorated

4.2 LBP RISK ASSESSMENT

Lead-based paint hazards and dust hazards were identified during the survey.

The lead hazards are:

- See Chart Above (13)

Lead in Dust Hazards

- Laundry Window Sill (Side C)
- Exterior Window Sill (Side B)

Lead in Soil Hazards

- Composite Dripline Soil

4.3 RESIDENT QUESTIONNAIRE FORM 5.0

A resident questionnaire was completed as part of the Assessment, to help the identify particular use patterns, which may be associated with potential LBP hazards, such as opening and closing windows painted with LBP. The answers to the questionnaire were obtained during an interview with the occupants. Following is a summary of the information obtained during the interview.

Children in the Household:	None under 6
Children's bed locations:	-
Children's eating locations:	-
Primary interior play area(s):	-
Primary exterior play area(s):	-
Pets:	-
Blood lead testing history:	-

Observed chewed surfaces:	-
Women of child bearing age:	1
Previous lead testing:	None
Frequently used entrances:	Front & Laundry Door
Frequently opened windows:	None
Structure Cooling Method:	HVAC System
Gardening –type and location:	None
Plans for landscaping:	None
Cleaning regiment:	Weekly
Cleaning Methods:	Mopping, sweeping, dusting, vacuuming
Recent completed renovations:	None
Demolition debris on site:	None
Resident with work lead exposure:	None
Planned Renovations:	A scope of work document for this residence is included in Appendix C.

4.4 BUILDING CONDITION FORM 5.1

Condition	Yes	No	Comments
Roof is missing parts of surfaces (tiles, boards, shakes, etc.)		X	
Roof has holes or large cracks		X	
Gutters or downspouts broken, missing.	X		No Gutters
Chimney masonry cracked, bricks loose or missing, obviously out of plumb.		X	
Exterior or interior walls have obvious large cracks or holes, requiring more than routine painting.		X	
Exterior siding has missing boards or shingles		X	
Water stains on interior walls or ceilings	X		Kitchen Ceiling
Walls, floors or ceilings deteriorated		X	
More than “very small*” amount of paint in a room deteriorated		X	
Two or more windows or doors broken, missing, or boarded up		X	
Porch or steps have major elements broken, missing, or boarded up.	X		Interior Steps unfinished
Foundation has major cracks, missing material, structure leans, or visibly unsound		X	
Total Number	3	9	

*The “very small” amount is the de-minimis amount under the HUD Lead Safe Housing Rule (24 CFR 35.1350(d)), or the amount of paint that is not “paint in poor condition” under the EPA lead training and certification (“402”) rule (40 CFR 745.223)

4.5 DUST WIPE SAMPLE ANALYSIS

Dust wipe samples were collected in an effort to determine the levels of lead-containing dust on the interior windowsills and floors. The following tables note the presence or absence of lead hazards in dust per the EPA risk assessment and clearance standards. Please refer to Appendix B for detailed analytical reports. The presence of these hazards indicates that sample results exceed the following EPA criteria:

- 10 ug/ft² for floors, including carpeted floors
- 100 ug/ft² for windowsills
- 100 ug/ft² for window troughs

The following table indicates the sample number, location, surface type, lead concentration, and presence or absence of lead dust hazards for dust wipe samples collected during this LBP Risk Assessment:

Dust Wipe Sample Analysis				
Sample #	Location	Surface Types	Concentration (Micrograms/ft²)	Lead Hazard
01	Laundry	Floor	<2.5	No
02	Laundry	Window Sill	200	Yes
03	Kitchen	Floor	<2.5	No
04	Kitchen	Window Sill	<4.4	No
05	Living Room	Floor	<2.5	No
06	Living Room	Window Sill	64	No
07	Front Porch	Floor (conc)	14	No
08	Exterior (B Side)	Window Sill	170	Yes

4.6 SOIL SAMPLE ANALYSIS

The EPA has established lead hazard standards for lead in soil under TSCA Section 403 (Residential Lead Hazards). Please refer to Appendix B for detailed analytical reports. The following level of lead in soil should be considered hazardous and may result in excessive lead exposure and elevated blood lead levels:

- 400 milligrams per kilogram (mg/Kg) in children's play areas with bare residential soil (e.g., sandboxes, gardens)
- 1,200 mg/Kg (average) in bare soil for the remainder of the yard.

The following table indicates the sample number, location, surface type, lead concentration, and presence or absence of lead soil hazards for soil samples collected during this LBP Risk Assessment:

Soil Sample Analysis				
Sample #	Location	Bare or Covered	Concentration (Micrograms/ft ²)	Lead Hazard
09	Composite Dripline	Bare	1,200	Yes

5.0 RECOMMENDATIONS

5.1 DETERIORATED LEAD-BASED PAINT

Room or Exterior Location	Component	Type of Hazard	Approximate Area or Length	Acceptable Hazard Control Options	
				Interim	Abatement
Kitchen	Door Casing	Paint		Wet scrape/Repaint	Replace
Exterior	Soffit & Fascia	Paint		Wet scrape/Repaint	Enclose, Encapsulate or Replace
Exterior	Window, Sill & Casing	Paint		Wet scrape/Repaint	Replace
Exterior	Window Trim	Paint		Wet scrape/Repaint	Enclose, Encapsulate or Replace

5.2 LEAD DUST CONTROL OPTIONS

Room	Surface	Acceptable Hazard Control Method
Laundry	Window Sill	Hepa-Vac/Wet Wipe/Hepa-Vac
Exterior (B Side)	Window Sill	Hepa-Vac/Wet Wipe/Hepa-Vac

5.3 LEAD IN SOIL

Type Of Area	Location	Acceptable Hazard Control Options	
Dripline	Composite (All Sides)	Cover with Mulch, Sod, Gravel or Topsoil	Remove & Replace, Pave over with Asphalt or Concrete

6.0 RE-EVALUATION AND MONITORING SCHEDULE

Each of these treatments will need to be reexamined periodically to make certain that they remain effective and to ensure that new lead-based paint hazards do not appear. The interim controls shown above are less expensive initially, but they may be more expensive in the end since they need to be reevaluated more frequently. The replacement and paint removal methods are more expensive initially, but do not require any reevaluation.

The owner should monitor the condition of the paint at least annually or if there is some indication, that paint might be failing. A professional reevaluation is also needed. The standard schedule for reevaluation the dwelling is shown above.

Re-evaluation: Standard Re-evaluation Schedule 3 contained in the HUD Guidelines applies to this property, since one of the rooms had a dust lead level greater than the standard. Therefore, the dwelling should be reevaluated in June 2027 (12 months from now). If no lead-based paint hazards are identified at that time, another reevaluation should be conducted in June 2028 (2 years later). If no lead-based paint hazards are identified at that time, no further reevaluations are needed. However, since lead-based paint may be present in the dwelling, the owner should monitor the condition of all painted surfaces at least annually or whenever other information indicates a potential problem.

APPENDIX A: XRF Field Data Sheets & Floor Plan

Viken Detection

Pb200i

XRF Lead Paint Analyzer

3177

Pb200i-5.3.1

Reading #	Pb	Units	Pb Error	Result	Secs	Date	Time	Room	Structure Member	Substrate	Wall	Condition
1	1.01	mg/cm2	0.07		20.02	6/5/2026	13:58:24	Calibration				
2	1.13	mg/cm2	0.07		20.07	6/5/2026	14:00:46	Calibration				
3	0.92	mg/cm2	0.11		7.48	6/5/2026	14:03:12	Calibration				
4	0.18	mg/cm2	0.2	Negative	2.47	6/5/2026	14:04:30	Living Room Room	Wall	Drywall	A	Intact
5	0.2	mg/cm2	0.4	Negative	2	6/5/2026	14:05:04	Living Room Room	Wall	Drywall	A	Intact
6	0	mg/cm2	0.3	Negative	2	6/5/2026	14:05:32	Living Room Room	Wall	Drywall	B	Intact
7	0.2	mg/cm2	0.3	Negative	2	6/5/2026	14:06:05	Living Room Room	Wall	Drywall	C	Intact
8	0	mg/cm2	0.3	Negative	2	6/5/2026	14:06:28	Living Room Room	Wall	Drywall	D	Intact
9	0	mg/cm2	0.3	Negative	2	6/5/2026	14:07:03	Living Room Room	Ceiling	Drywall		Intact
10	0.1	mg/cm2	0.3	Negative	2	6/5/2026	14:07:37	Living Room Room	Baseboard	Wood	D	Intact
11	0.1	mg/cm2	0.3	Negative	2	6/5/2026	14:08:20	Living Room Window		Wood	B	Intact
12	0.2	mg/cm2	0.3	Negative	2	6/5/2026	14:08:41	Living Room Window	Sill	Wood	B	Intact
13	0.2	mg/cm2	0.3	Negative	2	6/5/2026	14:09:15	Living Room Door		Metal	A	Intact
14	0.1	mg/cm2	0.3	Negative	2	6/5/2026	14:09:42	Living Room Door	Casing	Wood	A	Intact
15	0	mg/cm2	0.3	Negative	2	6/5/2026	14:10:21	Dining Room Room	Wall	Drywall	A	Intact
16	0.1	mg/cm2	0.3	Negative	2	6/5/2026	14:10:41	Dining Room Room	Wall	Drywall	B	Intact
17	0	mg/cm2	0.3	Negative	2	6/5/2026	14:11:11	Dining Room Room	Wall	Drywall	C	Intact
18	0.2	mg/cm2	0.3	Negative	2	6/5/2026	14:11:33	Dining Room Room	Wall	Drywall	D	Intact
19	0	mg/cm2	0.3	Negative	2	6/5/2026	14:12:18	Dining Room Room	Ceiling	Drywall		Intact
20	0.1	mg/cm2	0.3	Negative	2	6/5/2026	14:13:08	Dining Room Room	Baseboard	Wood	B	Intact
21	0.1	mg/cm2	0.3	Negative	2	6/5/2026	14:13:55	Dining Room Window		Wood	B	Intact
22	0.1	mg/cm2	0.3	Negative	2	6/5/2026	14:14:22	Dining Room Window	Sill	Wood	B	Intact
23	0.1	mg/cm2	0.3	Negative	2	6/5/2026	14:14:57	Dining Room Door		Wood	C	Intact
24	0.1	mg/cm2	0.3	Negative	2	6/5/2026	14:15:22	Dining Room Door	Casing	Wood	C	Intact
25	0	mg/cm2	0.3	Negative	2	6/5/2026	14:16:12	Kitchen Room	Wall	Drywall	A	Intact

26	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:16:34 Kitchen	Room	Wall	Drywall	B	Intact
27	0 mg/cm2	0.4 Negative	2	6/5/2026	14:16:57 Kitchen	Room	Wall	Drywall	C	Intact
28	0 mg/cm2	0.4 Negative	2	6/5/2026	14:17:18 Kitchen	Room	Wall	Drywall	D	Intact
29	0.3 mg/cm2	0.3 Negative	2	6/5/2026	14:17:59 Kitchen	Room	Baseboard	Wood	A	Intact
30	0 mg/cm2	0.3 Negative	2	6/5/2026	14:18:32 Kitchen	Cabinets	Door	Wood	B	Intact
31	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:18:50 Kitchen	Cabinets	Frame	Wood	B	Intact
32	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:19:21 Kitchen	Window		Wood	B	Intact
33	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:19:49 Kitchen	Window	Sill	Wood	B	Intact
34	0.9 mg/cm2	0.2 Negative	5	6/5/2026	14:20:17 Kitchen	Door		Wood	C	Deteriorated
35	4.3 mg/cm2	0.3 Positive	2	6/5/2026	14:20:57 Kitchen	Door	Casing	Wood	C	Deteriorated
36	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:21:44 Laundry Roc Room	Room	Wall	Drywall	A	Intact
37	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:22:05 Laundry Roc Room	Room	Wall	Drywall	B	Intact
38	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:22:45 Laundry Roc Room	Room	Wall	Drywall	C	Intact
39	0.2 mg/cm2	0.3 Negative	2	6/5/2026	14:23:08 Laundry Roc Room	Room	Wall	Drywall	D	Intact
40	0.3 mg/cm2	0.3 Negative	2	6/5/2026	14:23:37 Laundry Roc Room	Room	Ceiling	Drywall		Intact
41	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:24:09 Laundry Roc Room	Room	Baseboard	Wood	A	Intact
42	0.3 mg/cm2	0.3 Negative	2	6/5/2026	14:24:53 Laundry Roc Window	Window		Wood	C	Intact
43	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:25:20 Laundry Roc Window	Window	Sill	Wood	C	Deteriorated
44	0.2 mg/cm2	0.3 Negative	2	6/5/2026	14:25:56 Laundry Roc Door	Door		Metal	B	Intact
45	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:26:29 Laundry Roc Door	Door	Casing	Wood	B	Intact
46	4.4 mg/cm2	0.3 Positive	2	6/5/2026	14:27:32 Laundry Roc Door	Door	Header Trim	Wood	A	Intact
47	0 mg/cm2	0.3 Negative	2	6/5/2026	14:28:35 Bedroom 1	Room	Wall	Drywall	A	Intact
48	0 mg/cm2	0.3 Negative	2	6/5/2026	14:28:58 Bedroom 1	Room	Wall	Drywall	B	Intact
49	0 mg/cm2	0.3 Negative	2	6/5/2026	14:29:17 Bedroom 1	Room	Wall	Drywall	C	Intact
50	0 mg/cm2	0.3 Negative	2	6/5/2026	14:29:41 Bedroom 1	Room	Wall	Drywall	D	Intact
51	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:30:09 Bedroom 1	Room	Baseboard	Wood	D	Intact
52	0.2 mg/cm2	0.3 Negative	2	6/5/2026	14:30:49 Bedroom 1	Door		Metal	C	Intact
53	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:31:15 Bedroom 1	Door	Casing	Wood	C	Intact
54	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:31:52 Bedroom 1	Door		Wood	A	Intact
55	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:32:16 Bedroom 1	Door	Casing	Wood	A	Intact
56	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:32:55 Bedroom 2	Room	Wall	Drywall	A	Intact
57	0.3 mg/cm2	0.3 Negative	2	6/5/2026	14:33:16 Bedroom 2	Room	Wall	Drywall	B	Intact
58	0 mg/cm2	0.3 Negative	2	6/5/2026	14:33:36 Bedroom 2	Room	Wall	Drywall	C	Intact

59	0.3 mg/cm2	0.3 Negative	2	6/5/2026	14:33:57 Bedroom 2	Room	Wall	Drywall	D	Intact
60	0 mg/cm2	0.3 Negative	2	6/5/2026	14:34:16 Bedroom 2	Room	Ceiling	Drywall		Intact
61	0.2 mg/cm2	0.3 Negative	2	6/5/2026	14:34:48 Bedroom 2	Room	Baseboard	Wood	B	Intact
62	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:35:19 Bedroom 2	Window		Wood	C	Intact
63	0 mg/cm2	0.3 Negative	2	6/5/2026	14:35:40 Bedroom 2	Window	Sill	Wood	C	Intact
64	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:36:14 Bedroom 2	Door		Wood	B	Intact
65	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:36:36 Bedroom 2	Door	Casing	Wood	B	Intact
66	0 mg/cm2	0.3 Negative	2	6/5/2026	14:37:44 Bathroom 1	Room	Wall	Drywall	A	Intact
67	0 mg/cm2	0.3 Negative	2	6/5/2026	14:38:05 Bathroom 1	Room	Wall	Drywall	B	Intact
68	0.2 mg/cm2	0.3 Negative	2	6/5/2026	14:38:26 Bathroom 1	Room	Wall	Drywall	C	Intact
69	0 mg/cm2	0.3 Negative	3	6/5/2026	14:38:49 Bathroom 1	Room	Wall	Drywall	D	Intact
70	0 mg/cm2	0.3 Negative	2	6/5/2026	14:39:27 Bathroom 1	Room	Ceiling	Drywall		Intact
71	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:41:01 Bathroom 1	Cabinets	Door	Wood	A	Intact
72	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:41:22 Bathroom 1	Cabinets	Frame	Wood	A	Intact
73	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:41:56 Bathroom 1	Door		Wood	B	Intact
74	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:42:17 Bathroom 1	Door	Casing	Wood	B	Intact
75	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:43:15 Bedroom 3	Room	Wall	Drywall	A	Intact
76	0.2 mg/cm2	0.3 Negative	2	6/5/2026	14:43:36 Bedroom 3	Room	Wall	Drywall	B	Intact
77	0 mg/cm2	0.3 Negative	2	6/5/2026	14:43:58 Bedroom 3	Room	Wall	Drywall	C	Intact
78	0 mg/cm2	0.3 Negative	2	6/5/2026	14:44:17 Bedroom 3	Room	Wall	Drywall	D	Intact
79	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:44:39 Bedroom 3	Room	Ceiling	Drywall		Intact
80	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:45:09 Bedroom 3	Room	Baseboard	Wood	C	Intact
81	0.2 mg/cm2	0.3 Negative	2	6/5/2026	14:45:40 Bedroom 3	Window		Wood	A	Intact
82	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:46:09 Bedroom 3	Window	Sill	Wood	A	Intact
83	0 mg/cm2	0.3 Negative	2	6/5/2026	14:46:40 Bedroom 3	Door		Wood	B	Intact
84	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:46:59 Bedroom 3	Door	Casing	Wood	B	Intact
85	0.2 mg/cm2	0.3 Negative	2	6/5/2026	14:58:01 Exterior	Door		Metal	A	Intact
86	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:58:30 Exterior	Door	Jamb	Wood	A	Intact
87	0.1 mg/cm2	0.3 Negative	2	6/5/2026	14:58:57 Exterior	Room	Wall	Wood	A	Intact
88	6.6 mg/cm2	0.3 Positive	2	6/5/2026	14:59:54 Exterior	Soffit		Wood	A	Deteriorated
89	9 mg/cm2	0.3 Positive	2	6/5/2026	15:00:25 Exterior	Fascia		Wood	A	Deteriorated
90	0.3 mg/cm2	0.3 Negative	2	6/5/2026	15:01:09 Porch	Railing		Metal	A	Intact
91	6.7 mg/cm2	0.3 Positive	2	6/5/2026	15:02:02 Exterior	Window		Wood	A	Deteriorated

92	0.1 mg/cm2	0.3 Negative	2	6/5/2026	15:02:32	Exterior	Window	Sill	Wood	A	Deteriorated
93	3.4 mg/cm2	0.3 Positive	2	6/5/2026	15:03:01	Exterior	Window	Casing	Wood	A	Deteriorated
94	0.5 mg/cm2	0.3 Negative	2	6/5/2026	15:03:38	Exterior	Foundation		Concrete	A	Deteriorated
95	4.8 mg/cm2	0.3 Positive	2	6/5/2026	15:04:40	Exterior	Window	Trim	Wood	A	Deteriorated
96	0.1 mg/cm2	0.3 Negative	2	6/5/2026	15:05:39	Exterior	Room	Wall	Wood	B	Deteriorated
97	6.4 mg/cm2	0.3 Positive	2	6/5/2026	15:06:13	Exterior	Window		Wood	B	Deteriorated
98	0.1 mg/cm2	0.3 Negative	2	6/5/2026	15:06:38	Exterior	Window	Sill	Wood	B	Deteriorated
99	6.1 mg/cm2	0.3 Positive	2	6/5/2026	15:07:14	Exterior	Window	Trim	Wood	B	Deteriorated
100	0.7 mg/cm2	0.2 Negative	5	6/5/2026	15:08:20	Exterior	Room	Wall	Wood	A	Intact
101	0.7 mg/cm2	0.2 Negative	5	6/5/2026	15:09:57	Carport	Roof Deck		Wood	A	Deteriorated
102	0 mg/cm2	0.3 Negative	2	6/5/2026	15:10:42	Carport	Rafter		Wood	A	Deteriorated
103	0.1 mg/cm2	0.3 Negative	2	6/5/2026	15:12:20	Exterior	Room	Wall	Wood	D	Intact
104	5.2 mg/cm2	0.3 Positive	2	6/5/2026	15:12:59	Exterior	Window	Sill	Wood	D	Deteriorated
105	7.7 mg/cm2	0.3 Positive	2	6/5/2026	15:13:27	Exterior	Window	Casing	Wood	D	Deteriorated
106	6.1 mg/cm2	0.3 Positive	2	6/5/2026	15:14:09	Exterior	Window		Wood	D	Deteriorated
107	0.1 mg/cm2	0.3 Negative	2	6/5/2026	15:30:42	Exterior	Room	Wall	Wood	C	Deteriorated
108	3.9 mg/cm2	0.3 Positive	2	6/5/2026	15:31:14	Exterior	Window		Wood	C	Deteriorated
109	1.2 mg/cm2	0.2 Positive	5	6/5/2026	15:31:55	Exterior	Window	Sill	Wood	C	Deteriorated
110	0.1 mg/cm2	0.3 Negative	2	6/5/2026	15:32:52	Exterior	Door		Wood	C	Intact
111	0.1 mg/cm2	0.3 Negative	2	6/5/2026	15:33:11	Exterior	Door	Jamb	Wood	C	Intact
112	1.02 mg/cm2	0.07	20.06	6/5/2026	15:43:05	Calibration					
113	0.98 mg/cm2	0.07	20.04	6/5/2026	15:45:29	Calibration					
114	0.98 mg/cm2	0.07	20.05	6/5/2026	15:47:48	Calibration					

APPENDIX B: DUST WIPE & SOIL ANALYSIS



Environmental Chemistry Analysis Report

Pace Set ID: 505187
Date Received: 06/11/26
Received By: Amanda Bass
Date Sampled:
Time Sampled:
Analyst: EC
Date of Report: 06/15/26

AIHA LAP, LLC: 101352

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

Acct. No.: 69-000183

Project:
Location: Vinita
Project No.: N/A

Pace Sample ID	Client ID	Matrix	Parameter	Results	Reporting Limits	Units	Date/Time Analyzed	Method
001	01	Wipe	Lead	<2.5	2.5	ug/sq. Ft.	06/15/26 15:52	NIOSH 7082
002	02	Wipe	Lead	200	8.6	ug/sq. Ft.	06/15/26 15:52	NIOSH 7082
003	03	Wipe	Lead	<2.5	2.5	ug/sq. Ft.	06/15/26 15:52	NIOSH 7082
004	04	Wipe	Lead	<4.4	4.4	ug/sq. Ft.	06/15/26 15:52	NIOSH 7082
005	05	Wipe	Lead	<2.5	2.5	ug/sq. Ft.	06/15/26 15:52	NIOSH 7082
006	06	Wipe	Lead	64	4.4	ug/sq. Ft.	06/15/26 15:52	NIOSH 7082
007	07	Wipe	Lead	14	2.5	ug/sq. Ft.	06/15/26 15:52	NIOSH 7082
008	08	Wipe	Lead	170	4	ug/sq. Ft.	06/15/26 15:52	NIOSH 7082
009	09	Soil	Lead	1,200	25	mg/kg	06/12/26 16:49	Soil EPA 7000B (1)
010			Shipping					

Note: Sample results have not been corrected for blank values.

This report applies only to the standards or procedures indicated and to the specific samples tested. It is not indicative of the qualities of apparently identical or similar products or procedures, nor does it represent an ongoing assurance program unless so noted. These reports are for the exclusive use of the client and are not to be reproduced without specific written permission. Pace Analytical is not responsible for user-supplied data used in calculations. Customer provided data such as volumes, areas, etc., cannot be verified by Pace Analytical.

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

Wipe materials must meet ASTM E1792 criteria. Method detection limits and resultant reporting limits may not be valid for non-ASTM E1792 wipe material.

Measurement uncertainty available upon request.

EPA Method 7000B (1) = EPA 600/R-93/200 Preparation Modified. EPA 7000B Analysis Modified

EPA Method 7082 (2) = EPA 600/R-93/200 Preparation Modified. EPA 7082 Analysis Modified



Environmental Chemistry Analysis Report

Pace Set ID: 505187
Date Received: 06/11/26
Received By: Amanda Bass
Date Sampled:
Time Sampled:
Analyst: EC
Date of Report: 06/15/26

AIHA LAP, LLC: 101352

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

Acct. No.: 69-000183

Project:

Location: Vinita

Project No.: N/A

Pace Sample ID	Client ID	Matrix	Parameter	Results	Reporting Limits	Units	Date/Time Analyzed	Method
-------------------	-----------	--------	-----------	---------	---------------------	-------	-----------------------	--------

Authorized Signature: _____

Eric Caves, Chemistry Technical Manager

Note: Sample results have not been corrected for blank values.

This report applies only to the standards or procedures indicated and to the specific samples tested. It is not indicative of the qualities of apparently identical or similar products or procedures, nor does it represent an ongoing assurance program unless so noted. These reports are for the exclusive use of the client and are not to be reproduced without specific written permission. Pace Analytical is not responsible for user-supplied data used in calculations. Customer provided data such as volumes, areas, etc., cannot be verified by Pace Analytical.

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

Wipe materials must meet ASTM E1792 criteria. Method detection limits and resultant reporting limits may not be valid for non-ASTM E1792 wipe material.

Measurement uncertainty available upon request.

EPA Method 7000B (1) = EPA 600/R-93/200 Preparation Modified. EPA 7000B Analysis Modified

EPA Method 7082 (2) = EPA 600/R-93/200 Preparation Modified. EPA 7082 Analysis Modified

Supplemental Report QAQC Results

QA ID: 22404

Test: Lead

Date: 6/12/2026

Matrix: Soil

Lab Number: 505187

Approved By: Eric Caves

Date Approved: 6/12/2026

Notes:

Blank Data:

Type of Blank	Blank Value
FCB	0
ICB	0

Standards Data:

Standard	Low Limit	Obtained	High Limit
FCV	2.2	2.52	2.8
CCV	2.2	2.38	2.8
RLVS	0.05	0.06	0.15
ICV	0.9	0.93	1.1

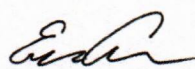
Duplicate Data:

Sample Number	Result	Duplicate	% RPD
505207-009	0.238	0.195	19.7

Recovery Data:

Sample Number	Result	Spike Level	Result + Spike	% Recovery	Dup. Result + Spike	% Dup. Recovery	% Spike RPD
LCS-S	0.000	2.428	2.112	87.0	2.291	94.4	8.1
505207-009	0.195	2.000	2.008	90.6			

Authorized Signature: _____



Eric Caves, Chemistry Technical Manager

Supplemental Report QAQC Results

QA ID: 22407
Test: Lead

Date: 6/15/2026
Matrix: Wipe

Lab Number: 505187
Approved By: Eric Caves
Date Approved: 6/15/2026

Notes:

Blank Data:

Type of Blank	Blank Value
FCB	0
ICB	0

Standards Data:

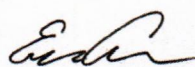
Standard	Low Limit	Obtained	High Limit
FCV	2.2	2.31	2.8
CCV	2.2	2.42	2.8
RLVS	0.05	0.1	0.15
ICV	0.9	1.01	1.1

Duplicate Data:

Recovery Data:

Sample Number	Result	Spike Level	Result + Spike	% Recovery	Dup. Result + Spike	% Dup. Recovery	% Spike RPD
LCS-W	0.000	2.428	2.392	98.5	2.269	93.5	5.3
LCS-W2	0.000	2.428	2.456	101.1	2.304	94.9	6.4

Authorized Signature: _____





LEAD CHAIN OF CUSTODY

7021 W Wilshire Blvd., Suite B, Oklahoma City, OK 73132
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Page 1 of 1

For Lab Use Only	
Lab No. 505187	☒ Accept ☐ Reject

Report Results (☒ one box)	
☐ Quantem Website	
☒ Email logan-girty@cherokee.org	
☐ Other	

Project Information	
Project Name:	
Project Location:	Vinita
Project ID:	
P.O. Number:	916621

Contact Information	
Company: Cherokee Nation Environmental	Phone: (918) 453-5000
Contact: Logan Girty	Cell Phone: (918) 772-8346
Account #: 69-000183	Email: logan-girty@cherokee.org
SAMPLED BY: Name: Logan Girty	Date: 06/05/2026

RELINQUISHED BY	DATE & TIME	VIA	RECEIVED BY	DATE & TIME
<i>Logan E. Girty</i>	6/8/26 @ 9AM	Fed Ex	<i>Paul B...</i>	6/11/26 8:40

REQUESTED SERVICES (Please ☒ the Appropriate Boxes)

No.	Sample ID (10 Characters Max)	Sample Description	Volume or Area	Flame Atomic Absorption			Other Analysis		
				EPA 7000B	NIOSH 7082	Other Analysis			
1	01	Laundry Room Floor	144 sq in	☐	☐	☐	☐	☐	
2	02	Laundry Room Window Sill	42 sq in	☐	☐	☐	☐	☐	
3	03	Kitchen Floor	144 sq in	☐	☐	☐	☐	☐	
4	04	Kitchen Window Sill	81 sq in	☐	☐	☐	☐	☐	
5	05	Living Rm Floor	144 sq in	☐	☐	☐	☐	☐	
6	06	Living Room Window Sill	81 sq in	☐	☐	☐	☐	☐	
7	07	Front Porch Floor (conc)	144 sq in	☐	☐	☐	☐	☐	
8	08	Ext Window Sill (side B)	90.75	☐	☐	☐	☐	☐	
9	09	Composite Soil		☐	☐	☐	☐	☐	
10				☐	☐	☐	☐	☐	
11				☐	☐	☐	☐	☐	

No.	Sample ID (10 Characters Max)	Sample Description	Volume or Area	Paint Chips			Flame Atomic Absorption			Other Analysis			TURNAROUND TIME
				w%	ppm	mg/cm ²	EPA 7000B	NIOSH 7082	Other Analysis				
1	01	Laundry Room Floor	144 sq in	☐	☐	☐	☐	☐	☐	☐	☐	Same Day	
2	02	Laundry Room Window Sill	42 sq in	☐	☐	☐	☐	☐	☐	☐	☐	24 - Hour	
3	03	Kitchen Floor	144 sq in	☐	☐	☐	☐	☐	☐	☐	☐	3 - Day	
4	04	Kitchen Window Sill	81 sq in	☐	☐	☐	☐	☐	☐	☐	☐	5 - Day	
5	05	Living Rm Floor	144 sq in	☐	☐	☐	☐	☐	☐	☐	☐		
6	06	Living Room Window Sill	81 sq in	☐	☐	☐	☐	☐	☐	☐	☐		
7	07	Front Porch Floor (conc)	144 sq in	☐	☐	☐	☐	☐	☐	☐	☐		
8	08	Ext Window Sill (side B)	90.75	☐	☐	☐	☐	☐	☐	☐	☐		
9	09	Composite Soil		☐	☐	☐	☐	☐	☐	☐	☐		
10				☐	☐	☐	☐	☐	☐	☐	☐		
11				☐	☐	☐	☐	☐	☐	☐	☐		

Check One
(if applicable)

☒ Assessment
☐ Clearance