CHEROKEE NATION
Environmental Programs

Asbestos Sampling Report

PARTICIPANT: Unit #13701

PREPARED BY: _____ **DATE:** 10/29/2025
TIMOTHY MILLER, ENVIRONMENTAL SPECIALIST II

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:

Unit #13701
475291 E. 690 Rd.
918-575-0842
Coordinates: 36.01702, -94.56085
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 October 20, 2025 at the request of the Cherokee Nation Housing Rehabilitation Department.

The site is a single family home built in 1940. 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 45 samples were analyzed from 30 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)
21-01	Blue Roll Sheet Flooring	Laundry Room	NF Cat 1	Significantly Damaged	20
24-01	Brown Roll Sheet Flooring	Living Room	NF Cat 1	Damaged	15

Table 2. Non – Asbestos Containing Materials				
Sample #	Material Description	Locations	Condition	Sample Results (% Asbestos)
All	Excluding 21-01 and 24-01			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
7021 W. Wilshire Blvd, Ste. B / Oklahoma City, OK 73132 / 405-755-7272

Polarized Light Microscopy Asbestos Analysis Report

QuanTEM Lab No. 384092
Account Number: C162

Client: Cherokee Nation Environmental Programs
Timothy Miller

Date Received: 10/21/2025
Received By: Charlie Johnson
Date Analyzed: 10/23/2025
Analyzed By: Tanner Smith
Methodology: EPA/600/R-93/116

unit #13701
Project Location: Westville
Project Number: NA

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
001	01-01	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
002	01-02	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
003	01-03	Layered	White Texture	Asbestos Not Present	NA	CaCO3 Paint
003a		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
004	02-01	Homogeneous	White Ceiling Tile	Asbestos Not Present	NA	Foam Binder
005	03-01	Homogeneous	Tan Ceiling Tile	Asbestos Not Present	NA	Foam Paint Tar
006	04-01	Layered	White Joint Compound	Asbestos Not Present	NA	CaCO3

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, Interim Method of the Determination of Asbestos in Bulk Insulation Samples; and EPA/600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials. 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. If submitted samples are inhomogeneous in nature, then subsamples of the components will be analyzed separately. Samples determined to contain asbestos fibers, will have the following acceptable error ranges (1% = 0-3%, 5% = 1-9%, 10% = 5-15%, 20% = 10-30%, 50% = 40-60%, etc.) as specified per EPA Method 600/R-93/116, Table 2-1.

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unit #13701

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Project Number: NA

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
006a		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
007	05-01	Layered	Multi-Color Wall Paper	Asbestos Not Present	Cellulose 40	Binder
007a		Layered	Tan Mastic	Asbestos Not Present	NA	Glue CaCO3
008	06-01	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
009	07-01	Homogeneous	White Caulk	Asbestos Not Present	NA	Glue Binder
010	08-01	Layered	Multi-Color Wall Paper	Asbestos Not Present	Cellulose 90	Binder
010a		Layered	Clear Mastic	Asbestos Not Present	NA	Glue

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010b		Layered	Multi-Color Wall Covering	Asbestos Not Present	Cellulose	90	Paint
011	09-01	Homogeneous	Tan Flooring	Asbestos Not Present	Cellulose	2	Vinyl CaCO3
012	10-01	Homogeneous	Brown Wall Paper	Asbestos Not Present	Cellulose	90	Binder Paint
013	11-01	Layered	Black Floor Tile	Asbestos Not Present	NA		CaCO3 Vinyl
013a		Layered	Tan Mastic	Asbestos Not Present	NA		Glue
014	12-01	Layered	Multi-Color Wall Paper	Asbestos Not Present	NA		Binder Paint
014a		Layered	Clear Mastic	Asbestos Not Present	NA		Glue

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unit #13701
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QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
015	13-01	Homogeneous	Multi-Color Wall Paper	Asbestos Not Present	Cellulose 40	Binder Paint
016	14-01	Layered	White Formica	Asbestos Not Present	Cellulose 60	Resin
016a		Layered	Orange Mastic	Asbestos Not Present	NA	Glue Binder
017	15-01	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
018	16-01	Homogeneous	White Liner	Asbestos Not Present	Cellulose 50	Binder Paint
019	17-01	Homogeneous	White Wall Paper	Asbestos Not Present	Cellulose 70	Binder
020	18-01	Layered	Black Counter Top	Asbestos Not Present	NA	Stone

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020a		Layered	Black Caulk	Asbestos Not Present	NA	Glue Binder
020b		Layered	Cream Mastic	Asbestos Not Present	NA	Glue CaCO3
021	19-01	Homogeneous	White Drywall	Asbestos Not Present	Cellulose 5	Gypsum
022	20-01	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
023	21-01	Layered	Blue Flooring	Asbestos Present Chrysotile 20	NA	Vinyl Binder
023a		Layered	Black Mastic	Asbestos Not Present	Cellulose 30	Tar

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QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
024	22-01	Homogeneous	Green Flooring	Asbestos Not Present	Cellulose 15 Synthetic 10 Hair 5	Vinyl Binder
025	23-01	Layered	White Texture	Asbestos Not Present	NA	CaCO3 Paint
025a		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
026	24-01	Layered	Brown Flooring	Asbestos Present Chrysotile 15	Cellulose 10	Vinyl Binder
026a		Layered	Tan Mastic	Asbestos Not Present	NA	Glue
027	25-01	Homogeneous	White Plaster	Asbestos Not Present	NA	CaCO3 Sand Paint
028	26-01	Homogeneous	Green Shingle	Asbestos Not Present	Cellulose 30 Synthetic 10	Tar Sand CaCO3

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Unit #13701

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Project Number: NA

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
029	27-01	Homogeneous	Gray Shingle	Asbestos Not Present	Glass Fiber 15	Tar Sand CaCO3
030	28-01	Homogeneous	White Caulk	Asbestos Not Present	NA	Glue Binder Paint
031	29-01	Homogeneous	Brown Shingle	Asbestos Not Present	Cellulose 30 Hair 2	Tar CaCO3 Sand
032	30-01	Homogeneous	White Caulk	Asbestos Not Present	NA	Glue CaCO3 Paint

Tanner Smith

Tanner Smith, Laboratory Analyst

10/23/2025
Date of Report

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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.	264692
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:	10/20/2025

Project Information	
Project Name:	#13701
Project Location:	Westville
Project ID:	
P.O. Number:	916621

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

RELINQUISHED BY	DATE & TIME	VIA	RECEIVED BY	DATE & TIME
Timothy Miller	10/20/25@2PM	Fedex		10/21/25 945

REQUESTED SERVICES (Please ☑ the Appropriate Boxes)

PLM	
☑	Bulk Analysis (EPA 600/R-93/116)
☐	400 Point Count
☐	1000 Point Count
☐	Gravimetric Preparation
☐	Particle ID

PLM	
☐	Vermiculite Attic Insulation (EPA 600/R-04/004)
☐	Other

PCM	
☐	NIOSH 7400

TEM	
☐	Air- AHERA
☐	Air- NIOSH 7402
☐	Air- ISO 10312
☐	Drinking Water- EPA 100.2
☐	Waste Water- EPA 600/4-83-043

TEM	
☐	Bulk- Presence / Absence EPA600/R-93/116
☐	Bulk- Quantitative [weight%]- Chatfield
☐	Dust- Presence / Absence
☐	Dust- Quantitative [fibers/sq.cm]- ASTM D5755
☐	Other

TURNAROUND TIME	
☐	Rush
☐	Same Day
☐	24 - Hour
☑	3 - Day
☐	5 - Day

No.	Sample ID (10 Characters Max)	☑ To Be Analyzed	Color	Description	Volume / Area (as applicable)	Comments / Notes
1	01-01	☑	White	Ceiling Texture		Living, Dining, Hall
2	01-02	☑	White	Ceiling Texture		Living, Dining, Hall
3	01-03	☑	White	Ceiling Texture		Living, Dining, Hall
4	02-01	☑	White	Ceiling Tile		Bed 1 & Bath 1
5	03-01	☑	Tan	Ceiling Tile		Bed 2
6	04-01	☑	White	Joint Compound		Bed 3
7	05-01	☑	Floral	Wallpaper		Bed 3
8	06-01	☑	White	Joint Compound		Bed 1 & 3
9	07-01	☑	White	Window Caulk		Bed 1 & 3
10	08-01	☑	Multi	Wallpaper Header		Bed 2

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

QUANTEM LABORATORIES
www.QuanTEM.com

ASBESTOS CHAIN OF CUSTODY

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

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For Lab Use Only
Lab No. _____
Accept Reject

Project Information

Company: Cherokee Nation Environmental Programs | Project Name: #13701 | Project Location: Westville

No.	Sample ID (10 Characters Max)	☑ To Be Analyzed	Color	Description	Volume / Area (as applicable)	Comments / Notes
11	09-01	☑	Tan	Roll Sheet Flooring		Bath 1
12	10-01	☑	Brown	Wallpaper		Bath 1, Dining, & Kitchen
13	11-01	☑	Black	Vinyl Tile		Hallway
14	12-01	☑	Floral/White	Wallpaper		Kitchen South Wall
15	13-01	☑	Floral	Wallpaper		Kitchen North Wall (Vent Hood)
16	14-01	☑	White	Formica		Kitchen
17	15-01	☑	White	Formica Countertop Joint Compound		Kitchen
18	16-01	☑	White	Shelf Liner		Kitchen
19	17-01	☑	White	Wallpaper		Kitchen
20	18-01	☑	Black	Contertop Tile		Kitchen
21	19-01	☑	White	Ceiling Drywall		Laundry Room
22	20-01	☑	White	Joint Compound		Laundry Room West Wall
23	21-01	☑	Blue	Roll Sheet Flooring		Laundry Room
24	22-01	☑	Green	Roll Sheet Flooring		Bath 2
25	23-01	☑	White	Drywall		Bath 2 & Laundry
26	24-01	☑	Brown	Roll Sheet Flooring		Living Room
27	25-01	☑	White	Siding Plaster		Exterior
28	26-01	☑	Green	Shingle		SW Porch Roof
29	27-01	☑	Gray	Shingle		Roof
30	28-01	☑	White	Caulk		Ext. Windows

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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For Lab Use Only	
Lab No. 384692	
Accept	Reject

Project Information		
Company: Cherokee Nation Environmental Programs	Project Name: #13701	Project Location: Westville

No.	Sample ID (10 Characters Max)	☑ To Be Analyzed	Color	Description	Volume / Area (as applicable)	Comments / Notes
31	29-01	☑	Brown	Shingle		Siding
32	30-01	☑	White	Caulk		Siding/Trim
33		☐				
34		☐				
35		☐				
36		☐				
37		☐				
38		☐				
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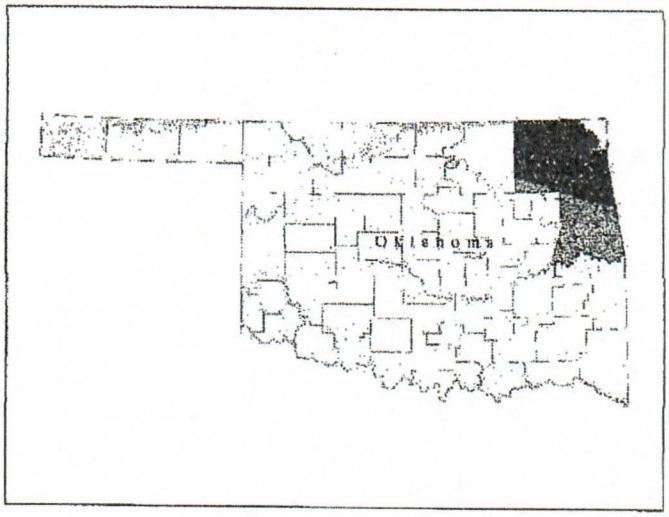
49		☐				
50		☐				

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

Cherokee Nation will use 2024 Competitive IHBG funds to replace twenty-two owner-occupied housing for low to moderate income Native Americans on its Rehabilitation Program wait list. Selected properties will be located throughout Cherokee Nation's 14 county reservation in northeast OK on fee simple, trust and/or restricted land.



The reservation covers all of six counties and parts of an additional eight counties of northeast Oklahoma with a total area of nearly 7,000 square miles and 4,447,716 acres. These counties include Adair, Cherokee, Craig, Delaware, Mayes, McIntosh, Muskogee, Nowata, Ottawa, Rogers, Sequoyah, Tulsa, Wagoner, and Washington. The reservation is primarily rural, faces significant poverty and has a shortage of stable, affordable housing.

Bedrooms	Square Footage
2	1091
3	1232
4	1467

All replacement homes will be modestly designed single family units ranging in size from 2 to 4 bedrooms dependent upon family composition. Site development and construction activity will adhere to applicable zoning regulations.

The Housing Authority of the Cherokee Nation will mitigate threats of extreme weather with roof systems clad with Class 4 impact rating asphalt shingles to reduce the effects of weather and lower insurance costs on each of the proposed units. Additionally, each unit will be constructed above the 500-year floodplain, ensuring that occupants will not be impacted by flooding. HACN will utilize energy efficient design in the construction of these units with Energy Star appliances, Low E Energy Star windows, and insulation that meets Energy Star recommended R-Values (30-attic and 25-wall).

Utilization of Energy Star appliances, windows and recommended R-Value insulation will result in a noticeable reduction in the household's monthly energy costs.

Energy Efficient Component	Cost Savings
Energy Star appliances	utility bill 10% - 50%
Low E Energy Star windows	utility bill 12%
Energy Star recommended R-value insulation	utility bill 10%
Class 4 Shingles	insurance premium 20% - 28%

Replacing these existing homes will allow for the preservation of housing and increase the household's long term housing stability. Providing these households with the opportunity to reside in safe, stable housing could change their family's trajectory by stabilizing the asset, increasing household net worth, and building generational wealth. According to the Census Bureau, homeowners have a net worth 80 times higher than that of renters. Besides the financial benefits, homeownership brings a sense of pride and security, and children have better educational outcomes when they are stably housed; funding this project will ensure LMI Native American households are stably housed and not displaced due to the condition of their home.