

CHEROKEE NATION
Environmental Programs



Asbestos Sampling Report

unit #11825

PREPARED BY:

Tim Miller

DATE: 8/12/2025

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:

9400 E. 129th S. Webber Falls, OK 74470
918-989-5246
Coordinates: 35.57229, -95.21775

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 05, 2025 at the request of the Cherokee Nation Housing Rehabilitation Department.

The site is a single family home built in 1979. 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 56 samples were analyzed from 37 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)
37-01	White Caulk	Exterior Windows	Friable	Good	5

Table 2. Non – Asbestos Containing Materials				
Sample #	Material Description	Locations	Condition	Sample Results (% Asbestos)
All excluding 37-01	All	All		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.



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Polarized Light Microscopy Asbestos Analysis Report

Quantem Lab No. 381747

Account Number: C162

Client: Cherokee Nation Environmental Programs
Timothy Miller

Date Received: 08/07/2025

Received By: Charlie Johnson

Date Analyzed: 08/08/2025

Analyzed By: Cassie Sanborn

Methodology: EPA/600/R-93/116

Unit #11825

Project Location: Webber Falls

Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
001	01-01	Homogeneous	White Ceiling Panel	Asbestos Not Present	Cellulose 80	Perlite Paint
002	02-01	Layered	White Wall Paper	Asbestos Not Present	NA	Vinyl Binder
002a		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
003	03-01	Layered	White Texture	Asbestos Not Present	NA	CaCO3 Paint
003a		Layered	White Wall Paper	Asbestos Not Present	NA	Vinyl Binder
003b		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
004	04-01	Layered	White Texture	Asbestos Not Present	NA	CaCO3 Paint

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

Quantem is a NVLAP accredited Testing PLM laboratory (Lab Code: 101959-0). This report relates only to the specific items tested.
NVLAP accreditation applies only to analysis performed utilizing EPA—40 CFR Appendix E to Subpart E of Part 763 and EPA/600/R-93/116 methods.
This report may not be used to claim product endorsement by NVLAP or any agency of the US Government.

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Analyzed By: Cassie Sanborn

Methodology: EPA/600/R-93/116

Unit #11825

Project Location: Webber Falls

Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
004a		Layered	White Joint Compound	Asbestos Not Present	NA	CaCO ₃
004b		Layered	White Wall Paper	Asbestos Not Present	NA	Vinyl Binder
004c		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
005	05-01	Layered	Brown Wall Paper	Asbestos Not Present	Cellulose 60	Vinyl Binder
005a		Layered	White Texture	Asbestos Not Present	NA	CaCO ₃
005b		Layered	White Joint Compound	Asbestos Not Present	NA	CaCO ₃

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Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
005c		Layered	White Wall Paper	Asbestos Not Present	NA	Vinyl Binder
005d		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
006	06-01	Homogeneous	Brown Sheet Vinyl	Asbestos Not Present	NA	CaCO3 Foam Vinyl
007	07-01	Homogeneous	Tan Joint Compound	Asbestos Not Present	NA	CaCO3
008	08-01	Layered	Brown Sheet Vinyl	Asbestos Not Present	Cellulose 20	CaCO3 Foam Vinyl
008a		Layered	Tan Surfacing	Asbestos Not Present	NA	CaCO3
009	09-01	Layered	Red Wall Paper	Asbestos Not Present	Cellulose 60	Vinyl Binder

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Received By: Charlie Johnson

Date Analyzed: 08/08/2025

Analyzed By: Cassie Sanborn

Methodology: EPA/600/R-93/116

Unit #11825

Project Location: Webber Falls

Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
009a		Layered	White Texture	Asbestos Not Present	NA	CaCO3
010	10-01	Homogeneous	White Caulk	Asbestos Not Present	NA	CaCO3 Binder
011	11-01	Layered	Tan Formica	Asbestos Not Present	Cellulose 80	Binder
011a		Layered	Yellow Mastic	Asbestos Not Present	NA	Glue
012	12-01	Homogeneous	Tan Caulk	Asbestos Not Present	NA	CaCO3 Binder
013	13-01	Homogeneous	White Caulk	Asbestos Not Present	NA	CaCO3 Binder

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Polarized Light Microscopy Asbestos Analysis Report

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Date Received: 08/07/2025

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Date Analyzed: 08/08/2025

Analyzed By: Cassie Sanborn

Methodology: EPA/600/R-93/116

Unit #.11825

Project Location: Webber Falls

Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
014	14-01	Homogeneous	Tan Caulk	Asbestos Not Present	NA	CaCO3 Binder
015	15-01	Layered	Brown Formica	Asbestos Not Present	Cellulose 80	Binder
015a		Layered	Tan Mastic	Asbestos Not Present	NA	Glue
016	16-01	Layered	Tan Wall Paper	Asbestos Not Present	Cellulose 20	Vinyl Binder
016a		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
017	17-01	Homogeneous	White Sheet Vinyl	Asbestos Not Present	Cellulose 20	CaCO3 Vinyl
018	18-01	Homogeneous	White Glue	Asbestos Not Present	NA	Glue Binder

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Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
019	19-01	Layered	Brown Cabinet Cover	Asbestos Not Present	Cellulose 30	Vinyl Binder
019a		Layered	Yellow Mastic	Asbestos Not Present	NA	Glue CaCO3
020	20-01	Homogeneous	White Surfacing	Asbestos Not Present	NA	CaCO3 Paint
021	21-01	Homogeneous	White Surfacing	Asbestos Not Present	NA	CaCO3 Paint
022	22-01	Homogeneous	White Drywall	Asbestos Not Present	Cellulose 10 Glass Fiber 2	Gypsum Paint
023	23-01	Layered	Tan Wall Paper	Asbestos Not Present	NA	Vinyl Binder Paint

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Date Analyzed: 08/08/2025

Analyzed By: Cassie Sanborn

Methodology: EPA/600/R-93/116

Unit #11825

Project Location: Webber Falls

Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
023a		Layered	White Drywall	Asbestos Not Present	Cellulose 10 Glass Fiber 2	Gypsum
024	24-01	Homogeneous	Yellow Glue	Asbestos Not Present	NA	Glue
025	25-01	Homogeneous	White Caulk	Asbestos Not Present	NA	Silicone Binder
026	26-01	Homogeneous	White Drywall	Asbestos Not Present	Cellulose 10 Glass Fiber 2	Gypsum Paint
027	27-01	Homogeneous	White Tape	Asbestos Not Present	Synthetic 20	CaCO3 Glue Binder
028	28-01	Homogeneous	White Caulk	Asbestos Not Present	NA	CaCO3 Binder
029	29-01	Homogeneous	White Caulk	Asbestos Not Present	NA	CaCO3 Binder

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Timothy Miller

Unit #11825

Project Location: Webber Falls

Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
030	30-01	Homogeneous	Gray Caulk	Asbestos Not Present	NA	CaCO ₃ Tar Binder
031	31-01	Homogeneous	Black Sealant	Asbestos Not Present	Cellulose 10	Tar Paint
032	32-01	Layered	White Caulk	Asbestos Not Present	NA	CaCO ₃ Binder
032a		Layered	Brown Caulk	Asbestos Not Present	NA	Silicone Binder
032b		Layered	Clear Caulk	Asbestos Not Present	NA	Silicone
033	33-01	Homogeneous	White Caulk	Asbestos Not Present	NA	Silicone

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Methodology: EPA/600/R-93/116

Unit #11825

Project Location: Webber Falls

Project Number: NA

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
034	34-01	Homogeneous	White Caulk	Asbestos Not Present	NA	CaCO3 Binder
035	35-01	Homogeneous	White Caulk	Asbestos Not Present	NA	CaCO3 Binder
036	36-01	Homogeneous	Tan Caulk	Asbestos Not Present	NA	CaCO3 Binder
037	37-01	Homogeneous	White Caulk	Asbestos Present Chrysotile 5	NA	CaCO3 Binder

Cassie Sanborn

Cassie Sanborn, Laboratory Analyst

8/11/2025

Date of Report

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For Lab Use Only	
Lab No. <u>381747</u>	Accept <input type="checkbox"/> Reject <input type="checkbox"/>

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

Contact Information		Project Information	
Company: Cherokee Nation Environmental Programs	Phone: (918) 207-4934	Project Name: <u>#11825</u>	
Contact: Timothy Miller	Cell Phone: (918) 570-9545	Project Location: Webber Falls	
Account #: C 162	E-mail: <u>timothy-miller@cherokee.org</u>	Project ID:	
SAMPLED BY: Name: Timothy Miller	Date: 08/05/2025	P.O. Number: 895481	

RELINQUISHED BY	DATE & TIME	VIA	RECEIVED BY	DATE & TIME
Timothy Miller	08/06/25@10AM	Fedex	<u>[Signature]</u>	8/7/25 1000

REQUESTED SERVICES (Please ☑ the Appropriate Boxes)

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

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 Panel		Throughout
2	02-01	<input checked="" type="checkbox"/>	White	Closet Wallpaper		Bedroom 1
3	03-01	<input checked="" type="checkbox"/>	Tan	Drywall		Bedroom 1
4	04-01	<input checked="" type="checkbox"/>	White	Window Joint Compound Patch		Bedroom 1
5	05-01	<input checked="" type="checkbox"/>	Multi	Wallpaper Border		Hallway 1
6	06-01	<input checked="" type="checkbox"/>	Brown	Roll Sheet Flooring		Hallway 1
7	07-01	<input checked="" type="checkbox"/>	Tan	HVAC Joint Compound Patch		Hallway 1
8	08-01	<input checked="" type="checkbox"/>	Brown	Roll Sheet Flooring		Bathroom 1
9	09-01	<input checked="" type="checkbox"/>	Red	Wallpaper		Bathroom 1
10	10-01	<input checked="" type="checkbox"/>	White	Sink Caulk		Bathroom 1



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Lab No. <u>381747</u>	Accept <input type="checkbox"/> Reject <input type="checkbox"/>

Project Information			
Company: Cherokee Nation Environmental Programs		Project Name: <u>Unit # 11825</u>	Project Location: <u>Webber Falls</u>
No.	Sample ID (10 Characters Max)	Color	Description
11	11-01	Tan	Sink Formica
12	12-01	Tan	Sink Caulk
13	13-01	White	Shower Caulk
14	14-01	Tan	Shower Caulk
15	15-01	Brown	Formica
16	16-01	Floral	Under Sink Wallpaper
17	17-01	White	Under Sink Roll Sheet Flooring
18	18-01	White	Above Sink Shelf Glue
19	19-01	Brown	Cabinet Cover
20	20-01	White	Ceiling Patches
21	21-01	White	Above Door Patch
22	22-01	White	Drywall
23	23-01	White	Joint Compound Patch
24	24-01	Yellow	Backsplash Glue
25	25-01	White	Caulk (Shower)
26	26-01	White	Drywall
27	27-01	White	Window Tape
28	28-01	White	Caulk
29	29-01	White	Caulk
30	30-01	Gray	Caulk

No.	Sample ID (10 Characters Max)	Color	Description	Volume / Area (as applicable)	Comments / Notes
11	11-01	Tan	Sink Formica		Bathroom 1
12	12-01	Tan	Sink Caulk		Bathroom 1
13	13-01	White	Shower Caulk		Bathroom 1
14	14-01	Tan	Shower Caulk		Bathroom 1
15	15-01	Brown	Formica		Kitchen
16	16-01	Floral	Under Sink Wallpaper		Kitchen
17	17-01	White	Under Sink Roll Sheet Flooring		Kitchen
18	18-01	White	Above Sink Shelf Glue		Kitchen
19	19-01	Brown	Cabinet Cover		Kitchen
20	20-01	White	Ceiling Patches		Living Room
21	21-01	White	Above Door Patch		Living Room
22	22-01	White	Drywall		Bedroom 2 & 3
23	23-01	White	Joint Compound Patch		Bedroom 2
24	24-01	Yellow	Backsplash Glue		Bathroom 2
25	25-01	White	Caulk (Shower)		Bathroom 2
26	26-01	White	Drywall		Bathroom 2
27	27-01	White	Window Tape		Bathroom 2
28	28-01	White	Caulk		West Porch Wall
29	29-01	White	Caulk		West Porch Ceiling
30	30-01	Gray	Caulk		West Wall (Galvanized Trim)



ASBESTOS CHAIN OF CUSTODY

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For Lab Use Only	
Lab No. <u>381747</u>	Accept <input type="checkbox"/> Reject <input type="checkbox"/>

Project Information						
Company: Cherokee Nation Environmental Programs		Project Name: <u>Unit #11825</u>	Project Location: Webber Falls			
No.	Sample ID (10 Characters Max)	<input checked="" type="checkbox"/> To Be Analyzed	Color	Description	Volume / Area (as applicable)	Comments / Notes
31	31-01	<input checked="" type="checkbox"/>	Black	Sealant		Roof Edge
32	32-01	<input checked="" type="checkbox"/>	Multi	Caulk		West Window & East Vent Hood
33	33-01	<input checked="" type="checkbox"/>	White	Caulk		East Patch (Under Satellite)
34	34-01	<input checked="" type="checkbox"/>	White	Caulk		East Door
35	35-01	<input checked="" type="checkbox"/>	White	Caulk		East Skirting
36	36-01	<input checked="" type="checkbox"/>	Tan	Caulk		Skirting Trim
37	37-01	<input checked="" type="checkbox"/>	White	Caulk		Exterior Windows
38		<input type="checkbox"/>				
39		<input type="checkbox"/>				
40		<input type="checkbox"/>				
41		<input type="checkbox"/>				
42		<input type="checkbox"/>				
43		<input type="checkbox"/>				
44		<input type="checkbox"/>				
45		<input type="checkbox"/>				
46		<input type="checkbox"/>				
47		<input type="checkbox"/>				
48		<input type="checkbox"/>				
49		<input type="checkbox"/>				
50		<input type="checkbox"/>				