CHEROKEE NATION
Environmental Programs

Asbestos Sampling Report

Unit #13059

PREPARED BY: Logan Girty **DATE:** 2/10/2026

LOGAN GIRTY. ENVIRONMENTAL SPECIALIST

REQUESTED BY: HACN HOUSING REHABILITATION – JAMIE WALTERS

TABLE OF CONTENTS

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:

16571 S Hwy 66, Claremore, OK 74018
918-810-6476
Coordinates: 36.3719 / -95.5627

The sampling was performed to determine the presence of all ACM from within the affected parts of the structure for EPA's National Emissions of Hazardous Air Pollutants (NESHAP) compliance as well as OSHA worker protection.

The inspector responsible for this project was:

Logan Girty, AHERA Inspector

The sampling was conducted on January 29, 2026, at the request of the Cherokee Nation Housing Rehabilitation Department.

The site is a single-family home built in 1954. 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. Pace Analytical (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 4 samples were analyzed from 2 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 has 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)
01-01 01-02 01-03	Drywall Ceiling Texture	Bathroom 2	Friable	Damaged	2% Chrysotile

Table 2. Non – Asbestos Containing Materials				
Sample #	Material Description	Locations	Condition	Sample Results (% Asbestos)
02-01	Drywall	Throughout	Damaged	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.

Polarized Light Microscopy Asbestos Analysis Report

Pace Set ID 501301
Account Number: 69-000183
Date Received: 02/03/2026
Received By: Charlie Johnson
Date Analyzed: 02/05/2026
Analyzed By: Benjamin Hill
Methodology: EPA/600/R-93/116

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

#13509

Project Location: Claremore
Project Number: NA

Pace Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
001	01-01	Homogeneous	White Ceiling Texture	Asbestos Present Chrysotile 2	NA	CaCO3
002	01-02	Homogeneous	White Ceiling Texture	Asbestos Present Chrysotile 2	NA	CaCO3
003	01-03	Homogeneous	White Ceiling Texture	Asbestos Present Chrysotile 2	NA	CaCO3
004	02-01	Homogeneous	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum Paint

Benjamin Hill

Benjamin Hill, Assistant Laboratory Manager

2/5/2026

Date of Report

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

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

LEGAL DOCUMENT - PLEASE PRINT LEGIBLY

For Lab Use Only	
Lab No.	501301
	Accept Reject

Contact Information			
Company:	Cherokee Nation Environmental Programs	Phone:	(918) 453-6140
Contact:	Logan Girty	Cell Phone:	(918) 772-8346
Account #:	69-000183	E-mail:	logan-girty@cherokee.org
SAMPLED BY:	Name: Logan Girty	Date:	1/29/2026

Project Information	
Project Name:	#13509
Project Location:	Claremore
Project ID:	
P.O. Number:	916621

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

RELINQUISHED BY	DATE & TIME	VIA	RECEIVED BY	DATE & TIME
Logan E. Girty	1/29/26 4 PM	Fed Ex		2/3/26 1030

REQUESTED SERVICES (Please ☑ the Appropriate Boxes)

PLM	
☑	Bulk Analysis **
☐	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	Drywall Ceiling Texture		Bathroom 2
2	01-02	☑	White	Drywall Ceiling Texture		Bathroom 2
3	01-03	☑	White	Drywall Ceiling Texture		Bathroom 2
4	02-01	☑	White	Drywall		Bath 2/Throughout
5		☐				
6		☐				
7		☐				
8		☐				
9		☐				
10		☐				

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 **PLM Bulk Analysis (EPA 40-CFR Appendix E to Subpart E of Part 763 and EPA 600/R-93/116 Methods)