

CHEROKEE NATION
Environmental Programs



Asbestos Sampling Report

#12637

PREPARED BY: Tyler Moore DATE: 10/29/2024

TYLER MOORE, ENVIRONMENTAL SPECIALIST I

REQUESTED BY: Housing Authority of the Cherokee Nation

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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:

918-990-1127
311 S. Boydston St.
Ft Gibson, OK 74434
Coordinates: 35.79566, 95.23741

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:

Tyler Moore EPA AHERA Inspector

The sampling was conducted on October 15, 2024, at the request of the Housing Authority of the Cherokee Nation.

The site is a single-family residential structure built in 1970. Sampling was limited to areas that would be affected by the project scope of work (Appendix A) provided by the Housing Authority of the Cherokee Nation.

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 of 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 17 samples were analyzed from 7 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 Thru 01-07	White Drywall Texture	Throughout	Friable	Damaged	2% Chrysotile
02-01 Thru 02-05	White Ceiling Texture	Throughout	Friable	Damaged	2% Chrysotile

Table 2. Non – Asbestos Containing Materials				
Sample #	Material Description	Locations	Condition	Sample Results (% Asbestos)
03-01	Grey Laminate Backsplash	Kitchen	Damaged	Negative
04-01	Tan Vinyl Flooring	Hallway	Damaged	Negative
05-01	Black Vinyl Floor Tile	Bath 1	Damaged	Negative
06-01	Tan Vinyl Sheet Floor	Utility Room	Damaged	Negative
07-01	Tan Vinyl Sheet Floor (under wood floor)	Living Room	Damaged	Negative

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. 373470	Client: Cherokee Nation Environmental Programs
Account Number: C162	Tyler Moore
Date Received: 10/17/2024	
Received By: Baylie Longstreth	
Date Analyzed: 10/21/2024	#12037
Analyzed By: Cassie Sanborn	Project Location: Ft. Gibson
Methodology: EPA/600/R-93/116	Project Number: N/A

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
001	01-01	Homogeneous	White Wall Texture	Asbestos Not Present	NA	Gypsum Mica Paint
002	01-02	Layered	White Wall Texture	Asbestos Not Present	NA	Gypsum Mica Paint
002a		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
003	01-03	Layered	White Wall Texture	Asbestos Not Present	NA	Gypsum Mica Paint
003a		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
004	01-04	Layered	White Wall Texture	Asbestos Not Present	NA	CaCO3 Mica 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. This report may not be reproduced except in full, without the written approval of the laboratory.



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Polarized Light Microscopy Asbestos Analysis Report

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 Date Received: 10/17/2024
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 Date Analyzed: 10/21/2024
 Analyzed By: Cassie Sanborn Project Location: Ft. Gibson
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#12637

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
004a		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
005	01-05	Layered	White Wall Texture	Asbestos Present Chrysotile <1	NA	Gypsum Paint
005a		Layered	White Joint Compound	Asbestos Present Chrysotile 2	NA	Gypsum
005b		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
006	01-06	Layered	White Wall Texture	Asbestos Present Chrysotile <1	NA	Gypsum Paint
006a		Layered	White Joint Compound	Asbestos Present Chrysotile 2	NA	Gypsum
006b		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum

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Analyzed By: Cassie Sanborn	Project Location: Ft. Gibson
Methodology: EPA/600/R-93/116	Project Number: N/A

#12637

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
007	01-07	Layered	White Wall Texture	Asbestos Not Present	NA	Gypsum Paint
007a		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
008	02-01	Layered	White Ceiling Texture	Asbestos Not Present	NA	Gypsum Foam Paint
008a		Layered	White Joint Compound	Asbestos Present Chrysotile 2	NA	Gypsum
008b		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
009	02-02	Layered	White Ceiling Texture	Asbestos Not Present	NA	Gypsum Foam Paint

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Polarized Light Microscopy Asbestos Analysis Report

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Received By: Baylie Longstreth	
Date Analyzed: 10/21/2024	#12637
Analyzed By: Cassie Sanborn	Project Location: Ft. Gibson
Methodology: EPA/600/R-93/116	Project Number: N/A

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
009a		Layered	White Joint Compound	Asbestos Present Chrysotile <1	NA	Gypsum
010	02-03	Layered	White Ceiling Texture	Asbestos Present Chrysotile 2	NA	Gypsum Paint
010a		Layered	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
011	02-04	Layered	White Ceiling Texture	Asbestos Not Present	NA	Gypsum Foam Paint
011a		Layered	White Joint Compound	Asbestos Present Chrysotile 2	NA	Gypsum
012	02-05	Layered	White Ceiling Texture	Asbestos Not Present	NA	Gypsum Foam Paint
012a		Layered	White Joint Compound	Asbestos Present Chrysotile 2	NA	Gypsum

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Analyzed By: Cassie Sanborn	Project Location: Ft. Gibson
Methodology: EPA/600/R-93/116	Project Number: N/A

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
013	04-01	Layered	Tan Floor Tile	Asbestos Not Present	NA	CaCO3 Vinyl
013a		Layered	Yellow Mastic	Asbestos Not Present	NA	Glue
013b		Layered	Tan Leveling Compound	Asbestos Not Present	NA	CaCO3 Gypsum
014	05-01	Layered	Black Floor Tile	Asbestos Not Present	NA	CaCO3 Vinyl
014a		Layered	White Mastic	Asbestos Not Present	NA	Glue
015	06-01	Layered	Tan Sheet Vinyl	Asbestos Not Present	Cellulose 15 Glass Fiber 5 Synthetic 5	CaCO3 Vinyl

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Analyzed By: Cassie Sanborn	Project Location: Ft. Gibson
Methodology: EPA/600/R-93/116	Project Number: N/A

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
015a		Layered	Yellow Mastic	Asbestos Not Present	NA	Glue
016	07-01	Layered	Tan Sheet Vinyl	Asbestos Not Present	Cellulose 10 Glass Fiber 5 Synthetic 5	CaCO3 Vinyl
016a		Layered	Yellow Mastic	Asbestos Not Present	NA	Glue
017	03-01	Layered	Gray Laminate	Asbestos Not Present	Cellulose 80	Binder
017a		Layered	Yellow Mastic	Asbestos Not Present	NA	Glue

Cassie Sanborn

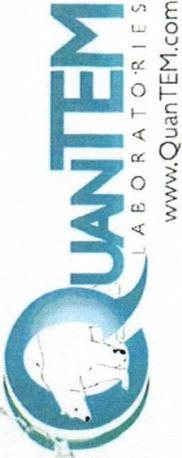
Cassie Sanborn, Laboratory Analyst

10/21/2024

Date of Report

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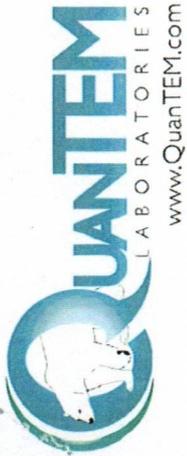
Contact Information Company: Cherokee Nation Environmental Programs Contact: Tyler Moore Account #: C 162 SAMPLED BY: Name: Tyler Moore		Contact Information Project Name: #12437 Project Location: Ft. Gibson, OK Project ID: P.O. Number: 896007	
Phone: (918) 453-7607	Cell Phone: (918) 772-8709	E-mail: tyler-moore@cherokee.org	Date: 10/15/24

RELINQUISHED BY: <u>[Signature]</u>	VIA: FedEx	RECEIVED BY: <u>[Signature]</u>	DATE & TIME: 10/16/2024
			DATE & TIME: 10/17/24 10:20

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)	Other	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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>	yellow	Wall Texture Throughout		
2	01-02	<input checked="" type="checkbox"/>	yellow	Wall Texture Throughout		
3	01-03	<input checked="" type="checkbox"/>	yellow	Wall Texture Throughout		
4	01-04	<input checked="" type="checkbox"/>	blue	Wall Texture Throughout		
5	01-05	<input checked="" type="checkbox"/>	blue	Wall Texture Throughout		
6	01-06	<input checked="" type="checkbox"/>	blue	Wall Texture Throughout		
7	01-07	<input checked="" type="checkbox"/>	blue	Wall Texture Throughout		
8	02-01	<input checked="" type="checkbox"/>	white	Ceiling Texture Throughout		
9	02-02	<input checked="" type="checkbox"/>	white	Ceiling Texture Throughout		
10	02-03	<input checked="" type="checkbox"/>	white	Ceiling Texture Throughout		



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Project Information		Project Name: #12037	Project Location: Ft. Gibson, OK			
No.	Sample ID (10 Characters Max)	To Be Analyzed	Color	Description	Volume / Area (as applicable)	Comments / Notes
11	02-04	<input checked="" type="checkbox"/>	White	Ceiling Texture Throughout		
12	02-05	<input checked="" type="checkbox"/>	White	Ceiling Texture Throughout		
13	04-01	<input checked="" type="checkbox"/>	Tan	Vinyl Floor Tile Hallway		
14	05-01	<input checked="" type="checkbox"/>	Black	Vinyl Floor Tile Bath 1		
15	06-01	<input checked="" type="checkbox"/>	Tan	Vinyl Roll Sheet Flooring Utility Rm		
16	07-01	<input checked="" type="checkbox"/>	Tan	Vinyl Flooring under wood in Living Rm		
17	03-01	<input checked="" type="checkbox"/>				*Added per Tyler Moore -88 10/12/24 4:30
18		<input type="checkbox"/>				
19		<input type="checkbox"/>				
20		<input type="checkbox"/>				
21		<input type="checkbox"/>				
22		<input type="checkbox"/>				
23		<input type="checkbox"/>				
24		<input type="checkbox"/>				
25		<input type="checkbox"/>				
26		<input type="checkbox"/>				
27		<input type="checkbox"/>				
28		<input type="checkbox"/>				
29		<input type="checkbox"/>				
30		<input type="checkbox"/>				