

CHEROKEE NATION
Environmental Programs



Asbestos Sampling Report

PARTICIPANT: #12843

PREPARED BY: Rylee Roberts **DATE:** 10/1/2025
RYLEE ROBERTS, 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:

35424 S. 620 Rd. Jay, OK. 74344

(918) 787-4647

Coordinates: 36.50348,-94.78117

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 September 23, 2025 at the request of the Cherokee Nation Housing Rehabilitation Department.

The site is a single family home built in 1952. 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 32 samples were analyzed from 14 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)
01-01 01-02 01-03	Ceiling Texture	Dining Room	Friable	D	3
02-01 02-02 02-03 02-04 02-05	Popcorn Ceiling	Throughout	Friable	D	4

Table 2. Non – Asbestos Containing Materials				
Sample #	Material Description	Locations	Condition	Sample Results (% Asbestos)
03-01	Caulk	Throughout	D	No Asbestos Present
04-01	Vynal	Utility Room	D	No Asbestos Present
05-01 05-02 05-03	Plaster	Utility Room	D	No Asbestos Present
06-01	Floor Tile	Kitchen	D	No Asbestos Present
07-01	Mortar	Throughout	D	No Asbestos Present
08-01	Mortar	Throughout	D	No Asbestos Present
09-01	Tile	Kitchen	D	No Asbestos Present
10-01	Grout	Bathroom 1	D	No Asbestos Present
11-01	Shingle	Roof	D	No Asbestos Present
12-01	Concrete	Foundation	D	No Asbestos Present
13-01	Insulation	Attic	D	No Asbestos Present
14-01	Insulation	Attic	D	No Asbestos 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.



7021 W. Wilshire Blvd, Ste. B / Oklahoma City, OK 73132 / 405-755-7272

Polarized Light Microscopy Asbestos Analysis Report

QuanTEM Lab No. 383395 Client: Cherokee Nation Environmental Programs
 Account Number: C162 Rylee Roberts
 Date Received: 09/26/2025
 Received By: Baylie Puga
 Date Analyzed: 09/30/2025 Project: #12843
 Analyzed By: Cassie Sanborn Project Location: Jay
 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	Tan Ceiling Texture	Asbestos Present Chrysotile 3	NA	CaCO3 Paint
002	01-02	Homogeneous	Tan Ceiling Texture	Asbestos Present Chrysotile 3	NA	CaCO3 Paint
003	01-03	Homogeneous	Tan Ceiling Texture	Asbestos Present Chrysotile 3	NA	CaCO3 Paint
004	02-01	Homogeneous	Tan Ceiling Texture	Asbestos Present Chrysotile 4	NA	CaCO3 Paint
005	02-02	Layered	White Ceiling Texture	Asbestos Not Present	NA	CaCO3
005a		Layered	White Sheetrock	Asbestos Not Present	Cellulose 10	Gypsum
006	02-03	Layered	White Ceiling Texture	Asbestos Not Present	NA	CaCO3 Foam

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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006a		Layered	White Sheetrock	Asbestos Not Present	Cellulose 10	Gypsum
007	02-04	Layered	White Ceiling Texture	Asbestos Not Present	NA	CaCO3 Foam
007a		Layered	White Sheetrock	Asbestos Not Present	Cellulose 10	Gypsum
008	02-05	Layered	White Ceiling Texture	Asbestos Not Present	NA	CaCO3 Foam
008a		Layered	White Sheetrock	Asbestos Not Present	Cellulose 10	Gypsum
009	03-01	Homogeneous	White Caulk	Asbestos Not Present	NA	CaCO3 Binder
010	04-01	Layered	Tan Sheet Vinyl	Asbestos Not Present	Cellulose 20	CaCO3 Vinyl

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Date Received: 09/26/2025

Received By: Baylie Puga

Date Analyzed: 09/30/2025

Project: #12843

Analyzed By: Cassie Sanborn

Project Location: Jay

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
010a		Layered	Yellow Mastic	Asbestos Not Present	NA	Glue
011	05-01	Homogeneous	Tan Plaster	Asbestos Not Present	NA	Gypsum Sand Paint
012	05-02	Layered	White Skim Coat	Asbestos Not Present	NA	CaCO3 Gypsum Paint
012a		Layered	Tan Plaster	Asbestos Not Present	NA	Gypsum Sand
013	05-03	Homogeneous	Tan Plaster	Asbestos Not Present	NA	Gypsum Sand
014	06-01	Layered	White Floor Tile	Asbestos Not Present	NA	Clay Sand
014a		Layered	Gray Grout	Asbestos Not Present	NA	CaCO3 Sand

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QuantEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
015	07-01	Homogeneous	Gray Mortar	Asbestos Not Present	NA	CaCO3 Sand
016	08-01	Homogeneous	Gray Mortar	Asbestos Not Present	NA	CaCO3 Sand
017	09-01	Layered	Brown Counter Top	Asbestos Not Present	NA	Clay Sand
017a		Layered	Tan Grout	Asbestos Not Present	NA	CaCO3 Clay
017b		Layered	White Mastic	Asbestos Not Present	NA	Glue CaCO3
017c		Layered	Tan Fiberboard	Asbestos Not Present	Cellulose 40	CaCO3 Binder
018	10-01	Homogeneous	White Grout	Asbestos Not Present	NA	CaCO3 Clay

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QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
019	11-01	Homogeneous	Gray Shingle	Asbestos Not Present	Glass Fiber 20	Tar Sand CaCO3
020	12-01	Homogeneous	Gray Concrete	Asbestos Not Present	NA	CaCO3 Sand
021	13-01	Homogeneous	Black Insulation	Asbestos Not Present	Cellulose 10	Tar
022	14-01	Homogeneous	Brown Insulation	Asbestos Not Present	Cellulose 100	

Cassie Sanborn

Cassie Sanborn, Laboratory Analyst

9/30/2025

Date of Report

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For Lab Use Only
Lab No. 383375
 Accept Reject

Report Results one box
 QuantEM Website
 Email ryan.roberts@quantem.com
 Other _____

Project Information
Project Name: #12843
Project Location: Jay
Project ID: _____
P.O. Number: 896007

Contact Information
Company: Cherokee Nation Environmental Programs
Phone: (918) 453-5092
Cell Phone: (918) 871-9373
E-mail: rylee-roberts@cherokee.org
Date: 9/23/2025
Contact: Rylee Roberts
Account #: C 162
Name: Logan Girty

RELINQUISHED BY: Rylee Roberts DATE & TIME: 9/24/2025 @ 5PM RECEIVED BY: [Signature] DATE & TIME: 9/26/25 9:20
[Signature]

REQUESTED SERVICES (Please the Appropriate Boxes)

PLM	PLM	PLM	TEM	TEM	TEM	TURNAROUND TIME
<input checked="" type="checkbox"/> Bulk Analysis **	<input type="checkbox"/> Vermiculite Attic Insulation (EPA 600/R-04/00-4)	<input type="checkbox"/> Air- AHERA	<input type="checkbox"/> Bulk- Presence / Absence EPA600/R-93/116	<input type="checkbox"/> Bulk- Quantitative [weight%]- Chatfield	<input type="checkbox"/> Rush	
<input type="checkbox"/> 400 Point Count	<input type="checkbox"/> Other	<input type="checkbox"/> Air- NIOSH 7402	<input type="checkbox"/> Bulk- Quantitative [weight%]- Chatfield	<input type="checkbox"/> Dust- Presence / Absence	<input type="checkbox"/> Same Day	
<input type="checkbox"/> 1000 Point Count	<input type="checkbox"/> PCM	<input type="checkbox"/> Air- ISO 10312	<input type="checkbox"/> Dust- Presence / Absence	<input type="checkbox"/> Dust- Quantitative [fibers/sq.cm]- ASTM D5755	<input type="checkbox"/> 24 - Hour	
<input type="checkbox"/> Gravimetric Preparation	<input type="checkbox"/> NIOSH 7400	<input type="checkbox"/> Drinking Water- EPA 100.2	<input type="checkbox"/> Other	<input type="checkbox"/> Other	<input checked="" type="checkbox"/> 3 - Day	
<input type="checkbox"/> Particle ID		<input type="checkbox"/> Waste Water- EPA 600/4-83-043			<input type="checkbox"/> 5 - Day	

No.	Sample ID (10 Characters Max)	To Be Analyzed <input checked="" type="checkbox"/>	Color	Description	Volume / Area (as applicable)	Comments / Notes
1	01-01	<input checked="" type="checkbox"/>	White	Ceiling Texture		Dining Room
2	01-02	<input checked="" type="checkbox"/>	White	Ceiling Texture		Dining Room
3	01-03	<input checked="" type="checkbox"/>	White	Ceiling Texture		Dining Room
4	02-01	<input checked="" type="checkbox"/>	White	Popcorn Ceiling		Living Room
5	02-02	<input checked="" type="checkbox"/>	White	Popcorn Ceiling		Living Room
6	02-03	<input checked="" type="checkbox"/>	White	Popcorn Ceiling		Bed Room
7	02-04	<input checked="" type="checkbox"/>	White	Popcorn Ceiling		Throughout
8	02-05	<input checked="" type="checkbox"/>	White	Popcorn Ceiling		Throughout
9	03-01	<input checked="" type="checkbox"/>	White	Caulk		Throughout
10	04-01	<input checked="" type="checkbox"/>	Tan	RSF		Utility Room

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)



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 7021 W Wilshire Blvd., Suite B, Oklahoma City, OK 73132
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For Lab Use Only
 Lab No. 383395
 Accept Reject

Project Information						
Company: Cherokee Nation Environmental Programs		Project Name: #12843		Project Location: Jay		
No.	Sample ID (10 Characters Max)	<input checked="" type="checkbox"/> To Be Analyzed	Color	Description	Volume / Area (as applicable)	Comments / Notes
11	05-01	<input checked="" type="checkbox"/>	White	Plaster/Stucco		Utility/Living Room
12	05-02	<input checked="" type="checkbox"/>	White	Plaster/Stucco		Utility/Living Room
13	05-03	<input checked="" type="checkbox"/>	White	Plaster/Stucco		Utility/Living Room
14	06-01	<input checked="" type="checkbox"/>	White	Floor Tile		Laundry Room
15	07-01	<input checked="" type="checkbox"/>	Gray	Brick and Mortar		Throughout
16	08-01	<input checked="" type="checkbox"/>	Gray	Brick and Mortar		Throughout
17	09-01	<input checked="" type="checkbox"/>	Brown	Tile Counter-Top		Kitchen
18	10-01	<input checked="" type="checkbox"/>	White	Tile ad Grout		Bathroom 1
19	11-01	<input checked="" type="checkbox"/>	Gray	Shingle		Roof
20	12-01	<input checked="" type="checkbox"/>	Gray	Concrete		Foundation
21	13-01	<input checked="" type="checkbox"/>	Black	Insulation		Attic
22	14-01	<input checked="" type="checkbox"/>	Brown	Insulation		Attic
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"/>				