CHEROKEE NATION
Environmental Programs

Asbestos Sampling Report

PARTICIPANT #13519

PREPARED BY: Rylee Roberts **DATE:** 3/31/2026
RYLEE ROBERTS. ENVIRONMENTAL SPECIALIST I

REQUESTED BY: HACN HOUSING REHABILITATION –
JAMIE WALTERS

TABLE OF CONTENTS

I. SITE INSPECTION/DESCRIPTION

II. BACKGROUND

III. FIELD PROCEDURES AND ANALYTICAL METHODS

IV. SUMMARY OF FINDINGS

V. CONCLUSIONS

APPENDIX A: PROJECT SCOPE OF WORK

APPENDIX B: LABORATORY REPORT & CHAIN OF CUSTODY

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:

450614 E. 980 Rd Vian, OK. 74962
(918) 207-8358
Coordinates: 35.59741, -94.99214

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:

Rylee Roberts, AHERA Inspector

The sampling was conducted on Febuary 24th, 2026, at the request of the Cherokee Nation Housing Rehabilitation Department.

The site is a single family home built in 1975. 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 Services, 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 24 samples were analyzed from 5 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 Thru 01-05	Popcorn Ceiling TXT	Throughout	Friable	D	3%

Table 2. Non – Asbestos Containing Materials				
Sample #	Material Description	Locations	Condition	Sample Results (% Asbestos)
02-01	Floor Tile	Kitchen	Damaged	No Asbestos Present
03-01 Thru 03-03	Wall TXT	Kitchen	Damaged	No Asbestos Present
04-01 Thru 04-03	Ceiling TXT	Bed 1	Damaged	No Asbestos Present
05-01	Concrete	Foundation	Damaged	No Asbestos Present
06-01	Brick & Mortor	Foundation	Damaged	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.

Polarized Light Microscopy Asbestos Analysis Report

Pace Set ID: 502748
Account Number: 69-000183
Date Received: 03/24/2026
Received By: Charlie Johnson
Date Analyzed: 03/26/2026
Analyzed By: Tanner Smith
Methodology: EPA/600/R-93/116

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

Project
Project Location: Vian
Project Number: NA

Pace Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)		Non-Asbestos Fiber (%)		Non Fibrous
001	01-01	Layered	White Texture	Asbestos Present Chrysotile	2	Cellulose	3	CaCO3 Mica Paint
001a		Layered	White Sheetrock	Asbestos Not Present		Cellulose	10	Gypsum
002	01-02	Layered	Tan Texture	Asbestos Not Present		NA		CaCO3 Gypsum
002a		Layered	White Joint Compound	Asbestos Present Chrysotile	3	NA		CaCO3
002b		Layered	White Sheetrock	Asbestos Not Present		Cellulose	10	Gypsum
003	01-03	Layered	White Texture	Asbestos Present Chrysotile	2	NA		CaCO3 Foam Paint
003a		Layered	White Sheetrock	Asbestos Not Present		Cellulose	10	Gypsum

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.

Polarized Light Microscopy Asbestos Analysis Report

Pace Set ID: 502748
Account Number: 69-000183
Date Received: 03/24/2026
Received By: Charlie Johnson
Date Analyzed: 03/26/2026
Analyzed By: Tanner Smith
Methodology: EPA/600/R-93/116

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

Project:
Project Location: Vian
Project Number: NA

Pace Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
004	01-04	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Foam
005	01-05	Layered	White Texture	Asbestos Not Present	NA	Gypsum CaCO3
005a		Layered	White Sheetrock	Asbestos Not Present	Cellulose 10	Gypsum
006	02-01	Layered	Tan Floor Tile	Asbestos Not Present	NA	Vinyl CaCO3
006a		Layered	Tan Mastic	Asbestos Not Present	NA	Glue Binder
007	03-01	Homogeneous	White Sheetrock	Asbestos Not Present	Cellulose 10	Gypsum
008	03-02	Homogeneous	Tan Texture	Asbestos Not Present	NA	Gypsum CaCO3 Paint

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.

Polarized Light Microscopy Asbestos Analysis Report

Pace Set ID	502748	Client:	Cherokee Nation Environmental Programs PO Box 948 Tahlequah, OK 74464
Account Number:	69-000183		
Date Received:	03/24/2026		
Received By:	Charlie Johnson		
Date Analyzed:	03/26/2026	Project:	
Analyzed By:	Tanner Smith	Project Location:	Vian
Methodology:	EPA/600/R-93/116	Project Number:	NA

Pace Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
009	03-03	Layered	Tan/White Texture	Asbestos Not Present	NA	Gypsum Paint
009a		Layered	White Joint Compound	Asbestos Not Present	NA	Gypsum
010	04-01	Layered	White Texture	Asbestos Not Present	NA	Gypsum Paint
010a		Layered	White Sheetrock	Asbestos Not Present	Cellulose 10	Gypsum
011	04-02	Layered	White Texture	Asbestos Not Present	NA	CaCO3 Paint
011a		Layered	White Sheetrock	Asbestos Not Present	Cellulose 10	CaCO3 Gypsum
012	04-03	Layered	White Texture	Asbestos Not Present	NA	Gypsum Paint

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.

Polarized Light Microscopy Asbestos Analysis Report

Pace Set ID	502748	Client:	Cherokee Nation Environmental Programs PO Box 948 Tahlequah, OK 74464
Account Number:	69-000183		
Date Received:	03/24/2026		
Received By:	Charlie Johnson		
Date Analyzed:	03/26/2026	Project:	
Analyzed By:	Tanner Smith	Project Location:	Vian
Methodology:	EPA/600/R-93/116	Project Number:	NA

Pace Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
012a		Layered	White Sheetrock	Asbestos Not Present	Cellulose 10	Gypsum
013	05-01	Homogeneous	Gray Concrete	Asbestos Not Present	NA	CaCO3 Sand Gravel
014	05-02	Homogeneous	Gray Mortar	Asbestos Not Present	NA	CaCO3 Sand Binder

Tanner Smith

Tanner Smith, Laboratory Analyst

3/27/2026

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. 502248
Accept Reject

Contact Information			
Company: Cherokee Nation Environmental Programs	Phone: (918) 453-5092	Project Name:	Report Results (☑ one box)
Contact: Rylee Roberts	Cell Phone: (918) 871-9373	Project Location: Vian	☐ QuanTEM Website
Account #: 69-000183	E-mail: rylee-roberts@cherokee.org	Project ID:	☑ Email rylee-roberts@cherokee.org
SAMPLED BY: Name: Rylee Roberts	Date: 2/24/2026	P.O. Number: 916621	☐ Other _____

RELINQUISHED BY	DATE & TIME	VIA	RECEIVED BY	DATE & TIME
	2/25/26 @ 5PM	FedEx	[signature]	3/24/26

REQUESTED SERVICES (Please ☑ the Appropriate Boxes)

PLM	PLM	TEM	TEM	TURNAROUND TIME
☑ Bulk Analysis **	☐ Vermiculite Attic Insulation (EPA 600/R-04/004)	☐ Air- AHERA	☐ Bulk- Presence / Absence EPA600/R-93/116	☐ Rush
☐ 400 Point Count	☐ Other	☐ Air- NIOSH 7402	☐ Bulk- Quantitative [weight%]- Chatfield	☐ Same Day
☐ 1000 Point Count		☐ Air- ISO 10312	☐ Dust- Presence / Absence	☐ 24 - Hour
☐ Gravimetric Preparation	PCM	☐ Drinking Water- EPA 100.2	☐ Dust- Quantitative [fibers/sq.cm]- ASTM D5755	☑ 3 - Day
☐ Particle ID	☐ NIOSH 7400	☐ Waste Water- EPA 600/4-83-043	☐ Other	☐ 5 - Day

No.	Sample ID (10 Characters Max)	☑ To Be Analyzed	Color	Description	Volume / Area (as applicable)	Comments / Notes
1	01-01	☑	White	Popcorn Ceiling Txt		Throughout
2	01-02	☑	White	Popcorn Ceiling Txt		Throughout
3	01-03	☑	White	Popcorn Ceiling Txt		Throughout
4	01-04	☑	White	Popcorn Ceiling Txt		Throughout
5	01-05	☑	White	Popcorn Ceiling Txt		Throughout
6	02-01	☑	Tan	Floor Tile		Kitchen
7	03-01	☑	Tan	Wall Txt		Bedroom 1
8	03-02	☑	Tan	Wall Txt		Bedroom 1
9	03-03	☑	Tan	Wall Txt		Bedroom 1
10	04-01	☑	White	Ceiling Txt		Bedroom 1

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)**

ASBESTOS CHAIN OF CUSTODY

7021 W Wilshire Blvd., Suite B, Oklahoma City, OK 73132
(800) 822-1650 • (405) 755-7272

LEGAL DOCUMENT - PLEASE PRINT LEGIBLY

QUANTEM LABORATORIES
www.QuanTEM.com

For Lab Use Only
Lab No. 502748
Accept Reject

Project Information

Company: Cherokee Nation Environmental Programs | Project Name: | Project Location: Vian

No.	Sample ID (10 Characters Max)	☑ To Be Analyzed	Color	Description	Volume / Area (as applicable)	Comments / Notes
11	04-02	☑	White	Ceiling Txt		Bedroom 1
12	04-03	☑	White	Ceiling Txt		Bedroom 1
13	05-01	☑	Grey	Concrete		Foundation
14	06-01	☑	Grey	Rock Mortar		Ext. Walls
15		☐				
16		☐				
17		☐				
18		☐				
19		☐				
20		☐				
21		☐				
22		☐				
23		☐				
24		☐				
25		☐				
26		☐				
27		☐				
28		☐				
29		☐				
30		☐				

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