

CHEROKEE NATION
Environmental Programs



Asbestos Sampling Report

SITE: CHOATE PROPERTY- OFFICE BUILDING

PREPARED BY: *Logan E. Girty* **DATE:** 8.17.22
LOGAN GIRTY, ENVIRONMENTAL SPECIALIST II

REQUESTED BY: CHEROKEE NATION FACILITIES MANAGEMENT DEPARTMENT -
SALENA WYNN

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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:

Choate Property- Office Building (Former Light Eyes Beads & One Feather Books)
17670 S Muskogee Ave, Tahlequah, OK 74464
Coordinates: 35.8537 / -94.9903

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 ODOL, AHERA Inspector, License No: OK401597

The sampling was conducted on August 9, 2022 at the request of the Cherokee Nation Facilities Management Department.

The site is an office building with an unknown build date. Sampling was limited to areas that would be affected by the project scope of work. (Appendix A)

Regulated 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 14 samples were analyzed from 8 homogeneous areas due to multi-layers of material within some homogeneous sample areas. Photographs of all ACM can be found in Appendix C. 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 01-04 01-05 01-06 01-07	Popcorn Ceiling Texture	Throughout	RACM Friable	Damaged	4% Chrysotile
07-01	Vinyl Composition Tile	Gift (Book) Shop	NF Cat I	Damaged	6% Chrysotile
08-01	Joint Wall Compound	Gift (Book) Shop	RACM Friable	Damaged	3% Chrysotile

Table 2. Non – Asbestos Containing Materials

Sample #	Material Description	Locations	Condition	Sample Results (% Asbestos)
02-01	Carpet Mastic	Bead Shop	Damaged	None Detected
03-01	Formica Countertop	Bead Shop	Damaged	None Detected
04-01	Shingle	Roof	Good	None Detected
05-01	Carpet Mastic	Gift (Book) Shop	Good	None Detected
06-01	Drywall	Gift (Book) Shop	Good	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.

APPENDIX A.

PROJECT SCOPE OF WORK

Sampled site as full demolition.

APPENDIX B.
LABORATORY RESULTS
&
CHAIN OF CUSTODY



2033 HERITAGE PARK DR, OKLAHOMA CITY, OK 73120 | 1.800.822.1650

Polarized Light Microscopy Asbestos Analysis Report

QuanTEM Lab No. 349553	Client: Cherokee Nation Environmental Programs
Account Number: C162	Logan Girty
Date Received: 08/11/2022	PO Box 948
Received By: Baylie Longstreth	Tahlequah, OK 74464
Date Analyzed: 08/16/2022	Project: Choate Property Bldg 1
Analyzed By: Benjamin Hill	Project Location: Tahlequah
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 Ceiling Texture	Asbestos Present Chrysotile 4	NA	CaCO3
002	01-02	Homogeneous	White Ceiling Texture	Asbestos Present Chrysotile 4	NA	CaCO3
003	01-03	Homogeneous	White Ceiling Texture	Asbestos Present Chrysotile 4	NA	CaCO3
004	01-04	Homogeneous	White Ceiling Texture	Asbestos Present Chrysotile 4	NA	CaCO3
005	01-05	Homogeneous	White Ceiling Texture	Asbestos Present Chrysotile 4	NA	CaCO3
006	01-06	Homogeneous	White Ceiling Texture	Asbestos Present Chrysotile 4	NA	CaCO3
007	01-07	Homogeneous	White Ceiling Texture	Asbestos Present Chrysotile 4	NA	CaCO3

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/600/M4-82-020 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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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
008	02-01	Layered	Multi-Color Carpet	Asbestos Not Present	Synthetic 90	Binder
008a		Layered	Yellow Mastic	Asbestos Not Present	NA	Glue
009	03-01	Layered	Beige Counter Top	Asbestos Not Present	Cellulose 80	Binder
009a		Layered	Cream Mastic	Asbestos Not Present	NA	Glue CaCO3
010	04-01	Layered	Beige/Brown Shingle	Asbestos Not Present	Glass Fiber 25	Tar Sand
010a		Layered	Black Tar	Asbestos Not Present	NA	Tar CaCO3

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Date Analyzed:	08/16/2022	Project:	Choate Property Bldg 1
Analyzed By:	Benjamin Hill	Project Location:	Tahlequah
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
011	05-01	Layered	Green Carpet	Asbestos Not Present	Synthetic 90	Binder
011a		Layered	Yellow Mastic	Asbestos Not Present	NA	Glue
012	06-01	Homogeneous	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
013	07-01	Layered	Tan Floor Tile	Asbestos Present Chrysotile 6	NA	CaCO3 Vinyl
013a		Layered	Black Mastic	Asbestos Present Chrysotile 6	NA	Tar
014	08-01	Homogeneous	White Joint Compound	Asbestos Present Chrysotile 3	NA	CaCO3

Benjamin Hill

Benjamin Hill, Assistant Laboratory Manager

8/16/2022

Date of Report

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

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ASBESTOS CHAIN OF CUSTODY

2033 Heritage Park Drive, Oklahoma City, OK 73120-7502
 (800) 822-1650 • (405) 755-7272 • Fax: (405) 755-2058

LEGAL DOCUMENT - PLEASE PRINT LEGIBLY

Contact Information		Project Information	
Company: Cherokee Nation Environmental Programs	Phone: (918) 453-6140	Project Name: Choate Property Bldg 1	Report Results (<input checked="" type="checkbox"/> one box)
Contact: Logan Girty	Cell Phone: (918) 772-8346	Project Location: Tahlequah	<input type="checkbox"/> QuantEM Website
Account #: C 162	Email: logan-girty@cherokee.org	Project ID:	<input checked="" type="checkbox"/> Email <u>logan-girty@cherokee.org</u>
SAMPLED BY: Name: Logan Girty	Date: 8/9/2022	P.O. Number: 272279	<input type="checkbox"/> Other _____

RELINQUISHED BY <i>Logan G. Girty</i>	DATE & TIME 8/9/2022	VIA FedEx	RECEIVED BY <i>[Signature]</i>	DATE & TIME 8/11/22 9:00
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REQUESTED SERVICES (Please the Appropriate Boxes)

PLM	PLM	TEM	TEM	TURNAROUND TIME
<input checked="" type="checkbox"/> Bulk Analysis (EPA 600/R-93/116)	<input type="checkbox"/> Vermiculite Attic Insulation (EPA 600/R-04/004)	<input type="checkbox"/> Air- AHERA	<input type="checkbox"/> Bulk- Presence / Absence EPA600/R-93/116	<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%]- Charfield	<input type="checkbox"/> Same Day
<input type="checkbox"/> 1000 Point Count		<input type="checkbox"/> Air- ISO 10312	<input type="checkbox"/> Dust- Presence / Absence	<input type="checkbox"/> 24 - Hour
<input type="checkbox"/> Gravimetric Preparation	PCM	<input type="checkbox"/> Drinking Water- EPA 100.2	<input type="checkbox"/> Dust- Quantitative [fibers/sq.cm]- ASTM D5755	<input checked="" type="checkbox"/> 3 - Day
<input type="checkbox"/> Particle ID	NIOSH 7400	<input type="checkbox"/> Waste Water- EPA 600/4-83-043	<input type="checkbox"/> Other	<input type="checkbox"/> 5 - Day

No.	Sample ID (10 Characters Max)	<input checked="" type="checkbox"/> To Be Analyzed	Color	Description	Volume / Area (as applicable)	Comments / Notes
1	01-01	<input checked="" type="checkbox"/>	White	Ceiling Texture		Throughout
2	01-02	<input checked="" type="checkbox"/>	White	Ceiling Texture		Throughout
3	01-03	<input checked="" type="checkbox"/>	White	Ceiling Texture		Throughout
4	01-04	<input checked="" type="checkbox"/>	White	Ceiling Texture		Throughout
5	01-05	<input checked="" type="checkbox"/>	White	Ceiling Texture		Throughout
6	01-06	<input checked="" type="checkbox"/>	White	Ceiling Texture		Throughout
7	01-07	<input checked="" type="checkbox"/>	White	Ceiling Texture		Throughout
8	02-01	<input checked="" type="checkbox"/>	Yellow	Carpet Mastic		Bead Shop
9	03-01	<input checked="" type="checkbox"/>	Beige	Formica Countertop		Bead Shop
10	04-01	<input checked="" type="checkbox"/>	Beige	Shingle		Roof

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

For Lab Use Only
 Lab No. 319553
 Accept Reject



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Page 2 of 2

For Lab Use Only
 Lab No. 349663
 Accept Reject

Project Information		Company: Cherokee Nation Environmental Programs		Project Name: Choate Property Bldg 1		Project Location: Tahlequah	
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"/>	Green	Carpet Mastic		Gift Shop	
12	06-01	<input checked="" type="checkbox"/>	White	Drywall		Gift Shop	
13	07-01	<input checked="" type="checkbox"/>	Tan	VCT		Gift Shop	
14	08-01	<input checked="" type="checkbox"/>	White	Joint Wall Compound		Gift Shop	
15		<input type="checkbox"/>					
16		<input type="checkbox"/>					
17		<input type="checkbox"/>					
18		<input type="checkbox"/>					
19		<input type="checkbox"/>					
20		<input type="checkbox"/>					
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26		<input type="checkbox"/>					
27		<input type="checkbox"/>					
28		<input type="checkbox"/>					
29		<input type="checkbox"/>					
30		<input type="checkbox"/>					

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