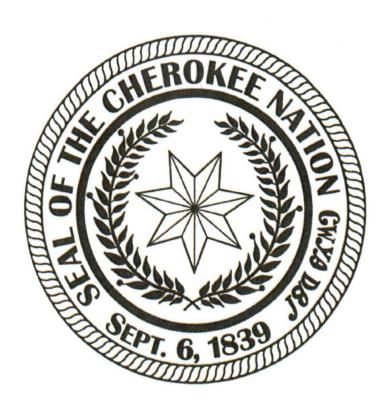
CHEROKEE NATION Environmental Programs



Asbestos Sampling Report

PARTICIPANT: TAYLOR, STEVEN

PREPARED BY:

DATE: 9.14.2022

LOGAN GIRTY, ENVIRONMENTAL SPECIALIST II

REQUESTED BY: HACN HOUSING REHABILITATION (HUD) -

GEORGE HUBBARD

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Cherokee Nation Environmental Programs (CNEP) has conducted asbestos sampling for the presence of asbestos containing materials (ACM) for the following site:

Steven Taylor 25589 E 813 Rd, Welling, OK 74481 918-431-3049 Coordinates: 35 8433 / -94 8517

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 31, 2022 at the request of the Cherokee Nation Housing Rehabilitation Department.

The site is a single family home built in 1950. Sampling was limited to areas that would be affected by the project scope of work (Appendix A) provided by the housing rehabilitation department.

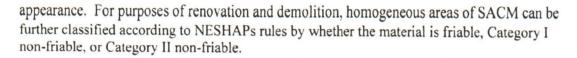
ACM was found at this site. See Section IV for locations.

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



<u>Friable ACM</u> 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.

<u>Category I Non-friable ACM</u> 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.

<u>Category II Non-friable ACM</u> 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.

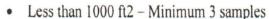
Significantly damaged: Material that is damaged, blistered, deteriorated, water stained over at least 10% of its total area.

<u>Damaged</u>: 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.



- 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. 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 2 samples were analyzed from 2 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	Roll Sheet Vinyl Flooring	Kitchen	NF Cat I	Damaged	15% Chrysotile

Sample #	Material Description	Locations	Condition	Sample Results (% Asbestos)
02-01	Roll Sheet Vinyl Flooring	Bath	Damaged	None Detected
	7	b * -		
		140		

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 B.

LABORATORY RESULTS &
CHAIN OF CUSTODY



1.800.822.1650 2033 HERITAGE PARK DR, OKLAHOMA CITY, OK 73120

Polarized Light Microscopy Asbestos Analysis Report

QuanTEM Lab No. 350340

Account Number: C162

Date Received:

09/02/2022

Received By:

Baylie Longstreth

Date Analyzed: Analyzed By: Methodology:

09/07/2022 Cassie Sanborn

EPA/600/R-93/116

Client: Cherokee Nation Environmental Programs

Logan Girty

PO Box 948

Tahlequah, OK 74464

Project: Steven Taylor Project Location: Welling

Project Number: N/A

Non-Asbestos Fiber (%)

Non Fibrous

Sample ID

OuanTEM

Client Sample ID

Composition

Color / Description

Asbestos (%)

001

01-01

Layered

Tan Sheet Vinyl

Asbestos Not Present

NA

CaCO3

001a

Layered

Yellow Mastic Asbestos Not Present

NA

Glue

Foam

Vinyl

001b

Layered

Tan Sheet Vinyl Asbestos Present Chrysotile

15

CaCO3 Vinyl

002

02-01

Layered

Tan

Asbestos Not Present

Cellulose Glass Fiber

Cellulose

CaCO3 15 Vinyl

5

002a

Layered

Brown Mastic

Sheet Vinyl

Asbestos Not Present

NA

Glue

Casul Lantro4

Cassie Sanborn, Laboratory Analyst

9/7/2022

Date of Report

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. This report may not be reproduced except in full, without the written approval of the laboratory.



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

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1	I noan Girty			Cell Phone: (9	Cell Phone: (918) 772-8346	Project Location: V	Welling		<u>></u>		Email logan-girty@cherokee.org
4	C 162			E-mail: logan-g	logan-girty@cherokee.org	Project ID:				Other	
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Nina of	And Boint Count		(EPA 600/R-04/004)		Air-NIOSH 7402	12	88	Bulk-Quantitative [weight%]- Chatfield	196]- Chatfield	Sam	Same Day
	1000 Point Count		Other		Air-150 10312		á	Dust- Presence / Absence		24 - 1	24 - Hour
Gravin	Gravimetric Preparation		PCM		Drinking Water- EPA 100.2	r- EPA 100.2	ā	Dust-Quantitative [fibers/sq.cm]- ASTM D5755	/sq.cm]- ASTM DS755	√ 3-Day	ay
Particle 10	eiO		NIOSH 7400		Waste Water- E	Waste Water- EPA 600/4-83-043	0	Other		5 - Day	ay
No.	Sample 1D	☑ To Be	Color		Description	ption		Volume / Area (as applicable)	Сотте	Comments / Notes	
	Od Od	5	Tan		Roll Sheet Vinyl Flooring	nyl Flooring			Σ	Kitchen	
	02-01		Tan		Roll Sheet Vinyl Flooring	nyl Flooring			Ш	Bath	
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0											
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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