

# Abbreviated Analysis of Brownfields Cleanup Alternatives and Community Involvement Plan

Old Headquarters-North Building Brownfield Site, 529 N. 16th St., Durant OK 74701

Bryan County

Tribal Tracking Number/ Brownfield ID: BRYTT0104

Prepared by: Choctaw Nation Brownfields Program

*Please note that the draft Analysis of Brownfields Cleanup Alternatives (ABCA) submitted as part of the proposal is intended as a brief preliminary document. The format of this document may not meet state requirements for the evaluation of cleanup alternatives.\**





## 1.0 INTRODUCTION AND BACKGROUND

The Old HQ completed the Brownfields Program in September of 2023 with an Asbestos and Lead-Based Paint Management Plan in place. However, due to planned renovations in the North Building, Facilities Maintenance reached out to the Indoor Air Quality program who reached out to the Brownfields Program to perform a lead-based paint screening and asbestos inspection for planned renovations. The North Building had had a previous inspection in 2013, but no lab results were included in the 2013 report, thus a new inspection was required. That asbestos inspection was performed by Stronghold Environmental on July 7th, 2025 by Monty Dolton, an Oklahoma licensed Asbestos Inspection (license #403113).

This report is a summation and an evaluation document to help the CNO Brownfields Program, Facilities Maintenance, and other internal departments make decisions about regulated materials management.

### 1.1 SITE LOCATION

Site Location: 529 N. 16th St., Durant, OK 74701

The site is exclusively limited to the North Building at this address only.

### 1.2 PREVIOUS SITE USES AND ANY PREVIOUS CLEANUP/REMEDIATION

Historically, the North Building was the original Oklahoma Presbyterian College for Girls constructed in 1909-1910. It is a three-story red brick building trimmed in white stone. The building served as a combination dormitory and an all-in-one school. Originally, the North Building had a partial fourth floor, but when the building was damaged in a fire in 1941, it was reconstructed without the top floor.

In 1951, the OPC became coeducational, but by 1966 the rising cost of higher education finally forced the college to close its doors. It was left vacant and fell into disrepair until 1975. In 1975, the building began to serve the community in a number of ways. First, as the Oklahoma Presbyterian Center, then as a head start, day care center, and other welfare services. Also in 1975, the Red River Valley Historical Society purchased the building to use as its headquarters and regional museum, with Mary Claude Parks tasked with curation. It was located in the basement, from where the ICW offices are to what used to be the small conference room. Just south of the museum, was an open space where beading, painting and other craft classes were held along with a gift shop, both managed by Julia Knight, a descendant of Ann Semple. That same year, Chief Clark David Gardner of the Choctaw Nation moved the Choctaw Nation's administrative offices from the Montgomery Ward building in downtown Durant to this building. A nomination for the National Register of Historic Places was approved for listing in 1976. Gradually, Choctaw Nation offices started filling the building and in the 1990s, when the head start, the day care center, and other welfare services moved from the building, add-on buildings began to be built to accommodate our growing needs. First with Finance, then Membership and the Bishinik newspaper.



According to our research, the North Building had an asbestos inspection in 2013 and an abatement in 2014 of all identified asbestos-containing material from that 2013 report. However, it is stated in the 2013 report that since the asbestos-containing material which was removed was ceiling texture, there exists the potential for un-removable over-spray to be present within the walls. Approximately 2,450 square feet of ACM was removed. The north building also has two sets of fire-safe doors on all three levels. These were most likely put into place as the structure was being constructed. This inspection and removal was performed by Marshall Environmental and Earth Tech. In 2014, Earth Tech included an addendum to the completed work that over-spray was present inside the wall structure and may have not been completely removed due to the inability to demolish the wall. The presence of this material should be put on record at the facility in order to provide awareness for any future remodelling projects. These areas, according to the 2014 removal paperwork, are encapsulated and present a minimal risk. During our research through the 2013 and 2014 paperwork, no lab work was found with the 2013 inspection, which voids the inspection by law. Therefore, another inspection was needed before planned renovations could take place. At this time, the site is entered into the Choctaw Nation Tribal Response Program and is tracked under Tribal Tracking Number BRYTT0104.

### 1.3 SITE ASSESSMENT FINDINGS

During the 2025 Asbestos Inspection of the North Building, Stronghold Environmental tested 64 homogeneous areas. Of the 64 homogeneous areas sampled, two came back as positive, meaning the building materials contain greater than 1% asbestos fibers. The first was the Broca ceiling texture (6% ACM - roughly 1,500 sq feet) and 12x12 tan floor tiles (approximately 100 sq ft).

The ceiling texture is found on the 1st floor lobby and adjoining rooms and in the assistant chief's office. The floor tiles are found in the closet of Room 103. Both of which are found on the 1st floor. No other asbestos containing materials were identified, except for the presumed asbestos -containing fire doors on all three floors.

[Appendix B: Photos](#) has identifying photos for ceiling textures.



## 1.4 RISK & RATIONALE

This ABCA addresses asbestos-containing materials (ACM) confirmed during the 2025 inspection at the Old Headquarters – North Building (529 N. 16th St., Durant, OK 74701). The survey identified two positive homogeneous areas (HAs): (1) HA-19 Broca ceiling texture (6% chrysotile) located in the first-floor lobby/adjoining rooms and the Assistant Chief’s Office. Fire-rated doors on all three floors remain presumed ACM (PACM) pending a specific decision to manage in place or remove under a project design.

The North Building will be reused as occupied office space. Friable surfacing ACM (ceiling texture) in actively used or renovated areas presents an inhalation exposure pathway during maintenance/renovation unless abated or effectively



managed. Although the floor tile is Category I non-friable when intact, it can become friable if mechanically disturbed (e.g., grinding, sanding) during renovations. Therefore, a protective action—either removal or robust management in place with enforceable work practices—is required to support safe re-occupancy and planned renovations while maintaining historic integrity.

The selected action must (a) eliminate or control exposure pathways for office occupants, maintenance staff, and contractors; (b) minimize disruptions to ongoing operations; and (c) respect the building’s historic features (e.g., crown moulding, fire doors) through compatible abatement/repair methods.

## 1.5 PROJECT GOALS

The project goals are to not only return the North Building to active, multi-tenant offices used by several departments, with public/staff access on all occupied floors, but to also eliminate or effectively control asbestos exposure pathways in all occupied spaces and preserve the character-defining elements by using minimally invasive techniques, selective removal, or manage-in-place strategies documented in an Asbestos Management Plan (AMP) when removal would materially damage historic fabric.

### 1.5.1 COMMUNITY INVOLVEMENT PLAN

Administrative Records will be available at Choctaw Nation Headquarters, located at 1802 Chukka Hina, Durant OK 74702. The administrative record shall contain previous site assessments, community outreach information, publications about this site, or other pertinent information. These records will be previously approved by CNO leadership for public consumption and will be housed at the Choctaw Nation Environmental Protection Service offices at the CNO Headquarters in Durant. The contact for people to reach out to shall be either the current Brownfields Coordinator or:

- Christa Ogden, MJIL or Sierra Rice

Brownfields Program Coordinators, 1802 Chukka Hina, Durant, OK 74702

(580) 642-7188

cogden@choctawnation.com, [sfrice@choctawnation.com](mailto:sfrice@choctawnation.com)

The Choctaw Nation Brownfields Program was approached by Facilities Maintenance who had requested updates to enhance reuse of the Old HQ. We have continuously worked with Stakeholders, namely CNO Facilities Maintenance, CNO Historic Preservation and other departments in coordinating programmatic meetings and discussions for this project.



Also, CNO Brownfields holds an annual outreach event at the Choctaw Nation Labor Day Festival, hosted by the Choctaw Nation each year at the Choctaw Nation Capital, located in Tuskahoma OK. The 2025 festival will be hosted August 29-31st, 2025. As part of the annual outreach, CNO Brownfields Program has a community need survey which is requested at the CNO Brownfields Program Booth. The booth is usually located close to the 'Going Green' tent located by the Volleyball courts in Red Warrior Park of Zone 5.

This information is collected and compounded annually into an interactive dashboard where our Brownfield Program can select responses from specific areas to understand community need from a specific area within the reservation when developing program parameters or objectives. We advertise using flags, social media, festival announcements, and educational promotional items.

When CNO Brownfields Program has cleanup plans or potential redevelopment plans of a brownfield within a particular district or county, our program selects a given area, around that site location and reviews the community need surveys which correlate to the brownfields location.

The CNO Brownfields Program reviews these surveys for guidance for potential redevelopment plans, or opinions on community need. These are not considered in lieu of site-specific information collection or generation. We simply use this information as a starting place and proceed forward with appropriate site-specific outreach.



## 2.0 APPLICABLE REGULATIONS AND CLEANUP STANDARDS

These activities as described below must be completed by a state licensed professional certified to oversee the work included below, whether project management or planning activities. The following are applicable standards and cleanup standards which could be applicable at this site:

- Oklahoma Department of Labor Asbestos Division: Adhere to the state's Asbestos Statutes (Title 40 Sections 451-457) and Abatement of Friable Asbestos Materials Rules, which outline the requirements for the safe handling, removal, and disposal of asbestos materials.
- 29 CFR 1926: Follow the most recent edition of the Construction Industry Standards, which include OSHA regulations specific to asbestos exposure and protective measures required in construction and renovation projects involving asbestos.
- 40 CFR, Subpart M (NESHAP):
  - For removal projects involving more than 160 square feet or 260 linear feet of friable asbestos-containing material submit the proper NESHAP notification to ODEQ at least 10 days prior to commencement of any work activities.
  - All friable asbestos abatement exceeding the NESHAP threshold will require a DOL-approved asbestos project design, an asbestos project checklist, and adherence to a 10-day notification period prior to any abatement activities.
- Monitoring and Maintenance for ACM Left in Place:  
For asbestos-containing materials that remain in place, periodic inspections by a qualified professional are recommended to monitor the condition of these materials. Regular monitoring helps prevent accidental fiber release due to deterioration or damage. Developing an asbestos management plan to outline necessary monitoring and maintenance activities is strongly advised for areas where ACM is left intact.
- Clarification on Non-Friable Asbestos-Containing Materials (ACM):  
Non-friable asbestos-containing materials, such as vinyl floor tiles or asbestos-cement products, typically do not require abatement if they are intact and undisturbed. However, these materials can pose a risk if they are damaged or disturbed, causing them to become friable and capable of releasing asbestos fibers. Proper handling and caution are advised to maintain the safety of nonfriable ACM in place.
- Encouragement for Professional Oversight: It is strongly recommended that any abatement, management, or monitoring activities for asbestos-containing materials be conducted under the guidance of certified asbestos professionals. Engaging licensed professionals for project planning, sampling, abatement, and post-abatement testing will ensure that all activities meet regulatory standards and industry best practices.

For all Choctaw Nation brownfield sites, site assessment and cleanup activities must be in compliance with applicable sections of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Small Business Liability Relief and Brownfields Revitalization Act (SBLBRA). This is a requirement of all brownfield site-specific activities. Other federal regulations overseeing specific contaminants may also be addressed in Section 2.3.



## 2.1 CLEANUP OVERSIGHT RESPONSIBILITY

This abatement or management plan will be overseen by the Choctaw Nation Environmental Protection Service and the US Environmental Protection Agency (EPA).

In addition, all documents prepared for this site are submitted to the federal environmental protection agency under Tribal Tracking Number BRYTT0104.

Regulatory oversight will be by US EPA, Region 6 Brownfields Project Officer. Any project designs or management plan shall be overseen by:

1. A State of Oklahoma licensed Asbestos Management Planner to perform:
  - Development of asbestos project designs;
  - Air monitoring for asbestos fibers;
2. State of Oklahoma licensed Asbestos Abatement Contractor.
3. Abatement required air monitoring shall be overseen by a licensed third-party contractor. All clearance will be overseen by that same third-party contractor. So that the abatement activities and clearance activities are overseen by two different contractors.
4. CNO Brownfields to approve all clearance prior to removal of containments.

## 2.2 CLEANUP STANDARDS FOR MAJOR CONTAMINANTS

The Choctaw Nation Brownfields Program will use applicable federal, tribal, and state standards for commercial use to be used as cleanup or management standards for this project. Applicable cleanup or management oversight and standards for asbestos will be followed as discussed above. No other contaminant standards are included in this evaluation.

Action Levels: Any building material >1% asbestos by PLM is ACM.

Abatement Air-Clearance: Post-abatement re-occupancy will require air clearance per the approved project design and governing regulations (e.g., AHERA/OSHA/EPA), typically  $\leq 0.01$  f/cc by PCM unless TEM is specified for the work area/type; the Management Planner will set the specific criterion.

Work area re-entry will be allowed only after documented clearance results, removal of containments as designed, and EPS acceptance.

## 2.3 LAWS & REGULATIONS APPLICABLE TO THE CLEANUP

### Applicable Federal Law and Regulations:

Please follow all National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asbestos and other requirements as applicable by CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act), SBLRBRA (Small Business Liability Relief and Brownfields Revitalization Act), Occupational Safety and Health Administration (OSHA), and the CAA (Clean Air Act).



Notifications: File ODEQ NESHAP notification  $\geq 10$  working days prior to work when thresholds are triggered (e.g.,  $> 160$  SF friable) as required under 40 CFR 61, Subpart M (NESHAP).

Waste: Package, label, transport, and dispose of ACM at an approved facility under manifests; maintain chain of custody. Non-friable floor tile must be removed by methods that prevent friability or else handled as friable waste under the project design.

Contractor qualifications: Use Oklahoma-licensed Asbestos Abatement Contractor(s); ensure worker/supervisor licensing and fit-for-duty medical clearance as required by ANSI Z88, NIOSH, and OSHA.

On-site controls: Engineering controls, negative pressure containments, decon units, and daily air monitoring as required by the project design. Mandatory post-abatement air clearance testing should be completed before the area can be re-occupied. This testing must demonstrate that airborne asbestos fibers levels meet regulatory limits, ensuring the area is safe for future use.

**Applicable Tribal Policy:**

TW EPS Asbestos Policy states that anyone, including contractors and CNO associates, conducting asbestos-related work on CNO property has valid asbestos licensing for the work being performed and adheres to the following licensing requirements:

- Asbestos inspectors, asbestos management planners, abatement workers, abatement supervisors, and CNO associates conducting asbestos-related work.

All other applicable EPS Asbestos Policy sections will be followed as pertains to any site-specific work by CNO Associates or contractors.

For Asbestos Management Plans:

- EPS Associates shall have and manage an Asbestos Management Plan prepared by a licensed Asbestos Management Planner for any CNO facility known to have ACM.
- Facility Maintenance Associates of any CNO facility with an Asbestos Management Plan in place shall have O&M worker training.
- Facility Asbestos Managers, assigned in the Asbestos Management Plan, shall maintain training records with the Asbestos Management Plan and ensure they are available for inspection upon request.

For Asbestos Abatement:

Follow all National Emission Standards for Hazardous Air Pollutants regulations and state licensing requirements.



## 3.0 EVALUATION OF CLEANUP ALTERNATIVES

### 3.1 CLEANUP ALTERNATIVES CONSIDERED

For the purposes of this evaluation, three alternatives are under consideration. However, a No Action alternative would not satisfy current regulations as it pertains to asbestos.

#### 3.1.a: No Action:

No abatement or management is implemented. Existing friable ACM (ceiling texture) remains in areas planned for occupancy/renovation, preserving exposure pathways during future disturbances and violating CNO policy and applicable regulations. This alternative does not meet the project's health-protective reuse objective and is not recommended.

#### 3.1.b: Leave in Place with Asbestos Management Program:

Document ACM and PACM (including fire-rated doors), implement an Operations & Maintenance (O&M) program with worker training, signage/labeling, periodic surveillance, and written safe-work practices (e.g., wet methods, no mechanical abrasion of floor tile). Encapsulate localized ceiling texture if left in place and protect during any renovation. This alternative reduces routine exposure but relies on perpetual administrative controls and restricts renovation methods/schedules. Long-term costs and compliance burden continue.

This alternative would leave asbestos-containing materials in place until such time as a budget for removal and replacement of the historically significant doors and other ACM which are also presumed to contain asbestos-containing materials can be allocated. An asbestos management plan is required as part of the CNO TW Asbestos Policy.

#### 3.1.c: Abatement of ACM:

Remove HA-19 ceiling texture (~1,500 SF) and HA-40 floor tile (~100 SF; includes mastic handling per design), with independent third-party air monitoring and clearance. Consider options for PACM fire doors: (a) manage in place with AMP and labeling, or (b) remove/replace under a separate design if reuse dictates. This alternative permanently eliminates primary exposure pathways in high-use areas and best supports renovation flexibility and long-term stewardship.

This alternative would remove any identified ACM at the site, except for the fire doors, which would require an Operations and Management Plan. There are difficulties which could affect work weeks, and work schedules. This would require a lengthier timeline for abatement when considering the RFP process and holdups to FM timelines.



## 3.2 COMPARE/CONTRAST OF CLEANUP ALTERNATIVES

### Cost:

- **Alternative #1:** \$0 direct (excludes risk/liability)
- **Alternative #2: Management Plan - \$3,500.00**
  - This may include an additional site visit with a licensed asbestos management planner to assess and document the identified ACM in person
  - These costs could be paid for by 128(a) TRP funding.
  - Create detailed response actions and preventative measures to reduce exposure risks
  - Specify actions taken to manage ACM in place
  - Provide documentation to initiate periodic surveillance to monitor the condition and prevent disturbance
  - Creating requirements for training of personnel that may come in contact with or disturb ACM
  - Designate an Asbestos Program Manager (James Parsons)
    - An Operations and Maintenance Program to be developed by James Parsons
- **Alternative #3: Abatement - \$20,000-\$25,000 + \$850.00**
  - The costs to remove the plaster ceiling in the designated areas may be approximately \$20,000 to 25,000
  - **Project design** associated with the abatement may cost \$850.00
  - Further discussion is needed to address the ornate crown moulding in the lobby area which can affect the costs of the project.
  - These costs could be paid for by 128(a) TRP funding.

Any associated restorative costs can not be paid with CNO Brownfields funding. Any exterior training costs which couldn't be given by EPS staff would also not be payable by 128(a) TRP funding.

### Effectiveness

- **Alternative #1:** No Action is not effective in controlling or preventing the exposure of receptors to contamination at the Site. This alternative is also non-compliant for environmental renovations and historic preservation regulations.
- **Alternative #2:** Leaving ACM in place is only effective if this alternative is rigorously implemented. ACM is to be maintained in good condition unless any type of renovation is planned for the areas identified to contain ACM. An Asbestos Management Plan and an OMP will also be required. The exposure will be controlled but not eliminated and could cost FM additional funding requirements for implementation and maintenance.
- **Alternative #3:** Abatement with Offsite Disposal is a highly effective way to eliminate risk at the Site, since contamination will be removed and the exposure pathways will no longer exist. We would meet all federal law with this alternative.

### Implementability

- **Alternative #1:** No Action is easy to implement since no actions will be conducted. This alternative would be the easiest, short-term.
- **Alternative #2:** Leaving ACM in place and implementing a management plan is considered moderately difficult. It would



require ongoing monitoring, training, and maintenance of the area. Also this alternative will require ongoing surveillance, strict work controls and ongoing coordination with environmental and facilities maintenance budgetary requirements.

- Alternative #3: Removal with Offsite Disposal is moderately difficult to implement. Coordination, erection of containment and abatement areas would potentially cause a moderate disturbance during cleanup activities and short-term disturbance to the building (e.g., decontamination areas, restricted access to these spaces, trucks transporting removed ACM) are anticipated. However, ongoing monitoring and maintenance will not be required following excavation and offsite disposal.

#### Long-Term OMP

- Alternative #1: None, but ongoing risk and liability is high.
- Alternative #2: Continuous inspections, training, and record maintenance.
- Alternative #3: None for removed ACM, AMP (Asbestos Management Plan) remains only where PACM is left intact with doors.

#### Community/Operations Impact

- Alternative #1: None initially, but future disturbances are highly risky.
- Alternative #2: Minimal day-to-day, but periodic inspections could disrupt the work day when they are scheduled, and asbestos awareness training would be required for all EVS, FM, and workers at the site.
- Alternative #3: Short-term closures, negative air machines, waste handling, but these would be limited and scheduled ahead of time so that work within the building could continue while abatement is completed. Use of engineering controls will help reduce impacts.

#### Historic Preservation

- Alternative #1: No disturbance.
- Alternative #2: Highest preservation (encapsulation and avoidance).
- Alternative #3: Selective removal; design to protect crown moulding and doors can be managed or removed with preservation plan.

#### Regulatory Compliance

- Alternative #1: Does not comply for renovation.
- Alternative #2: Only complies if rigorously followed.
- Alternative #3: Fully complies will all included notifications, design and clearance requirements.

### **3.3 RECOMMENDED CLEANUP ALTERNATIVE**

Recommendation: Proceed with Alternative #3: Abatement of HA-19 ceiling texture and HA-40 floor tile under a licensed project design with independent air monitoring and clearance. Manage PACM fire-rated doors in place under the AMP unless future reuse dictates removal under a separate design.

#### Rationale:



- Risk: Eliminates principal asbestos exposure pathways in the first-floor lobby suite and Room 103 closet, which are within planned occupied and renovation areas.
- Implementability: Short, scheduled abatement with containment and third-party air monitoring allows predictable downtime and supports renovation sequencing.
- Cost/Lifecycle: Slightly higher upfront cost than AMP-only, but \*\*avoids perpetual O&M burden and constraint on renovation methods\*\* for these areas.
- Preservation: Project design will protect character-defining features (e.g., crown moulding) via isolation and selective methods; doors preserved in place with AMP to maintain historic fabric.

### 3.4 IMPLEMENTATION SCHEDULE

1. Design & Procurement: [2-40 weeks] – Management Planner field verify, develop specs, solicit quotes, select contractor; EPA QAPP submissions and approvals; THPO Consultation forms; Project Design finalization.
2. Regulatory Notices: [10 working days minimum] – ODEQ NESHAP notice (if triggered); CNO requires 30 days notification.
3. Mobilization & Containment: [2-3 days] – Set up negative pressure containments, decon units, critical barriers.
4. Abatement (HA-19, HA-40): [2-4 days] – Removal under design (duration refined by contractor).
5. Air Clearance & Tear-Down: [1-2 days] – Independent third-party air monitoring, lab results, demobilization.
6. Closeout: [1 week] – Waste manifests, air clearance reports, photo log, completion memo to EPS/Brownfields.



## 4.0 COMMUNITY & STAKEHOLDER ENGAGEMENT

EPS/Brownfields will brief internal stakeholders (Facilities Maintenance, Safety/Risk, Programs occupying first-floor suites, and Historic Preservation) on the selected alternative, schedule, and access restrictions. A pre-abatement notice will be distributed to building occupants at least [5] business days prior to mobilization, with contact information for questions. If work could impact public access, EPS and Facilities Maintenance will coordinate signage and temporary routing with Facilities and Security. Meeting notes and notices will be retained in the project file.

### 4.1 Community Involvement Plan

Publication of this Analysis of Brownfield Cleanup Alternatives will be published to the CNO Brownfields website for comments for 15 days and will run concurrently with the THPO comment and QAPP approval periods.



## 5.0 STEWARDSHIP, OMP, AND WASTE MANAGEMENT

### 5.1 LONG-TERM STEWARDSHIP/OMP

If any ACM/PACM remains in place (e.g., fire-rated doors, concealed overspray from historical work), EPS will maintain an Asbestos Management Plan (AMP) identifying locations, signage/labels, surveillance frequency (e.g., annual), training needs for maintenance staff, and safe-work practices for future renovations. The AMP and training records will be kept at the facility and with EPS, and updated after each abatement or renovation activity.

### 5.2 WASTE MANAGEMENT & TRANSPORT

Abatement contractor will package ACM in leak-tight, labeled containers with generator information; maintain chain-of-custody and manifests; and transport to an approved disposal facility. Floor tile will be removed by methods specified in the design to prevent friability (or handled as friable if design dictates). Copies of manifests, weight tickets, and disposal receipts will be included in the closeout package.

### 5.3 QUALITY ASSURANCE/QUALITY CONTROL (QA/QC)

1. CNO and EPA must review and approve the Quality Assurance Project Plan and QA/QC checklist for this project.
2. Design QA: EPS review of the Management Planner's specifications for regulatory and scope alignment.
3. Field QA: Independent third-party conducts daily area/background air sampling per design; immediate corrective actions for exceedances. CNO and EPA will require a Quality Assurance Project Plan for these and for clearance test samplings.
4. Final QC: EPS receives and files clearance reports, manifests, photo documentation, and completion memo; AMP updated to reflect post-project conditions. EPS maintains documentation as a final abatement report which will include but will not be limited to the above reports, manifests, and documentation. Complete requirements for the report will be in the Abatement SOW.

### 5.4 ASSUMPTIONS AND LIMITATIONS

Quantities (e.g., ~1,500 SF ceiling texture; ~100 SF floor tile) are **\*\*planning estimates only\*\*** and must be verified by the project designer and contractor prior to finalization of the project design. Limited-access areas or concealed materials not sampled may require change orders if discovered. Cost ranges herein are **\*\*planning-level\*\*** and will be superseded by contractor quotes and the approved project design.

# STRONGHOLD ENVIRONMENTAL

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## ASBESTOS INSPECTION REPORT

For the Choctaw Nation



***Inspection performed at:***  
Old Headquarters Building (North Side)  
529 N. 16th St, Durant, OK 74701.

**Stronghold Environmental, LLC.**

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# TABLE OF CONTENTS

1.	Inspection Summary.....	3
2.	Section I: Definitions.....	5
3.	Section II: Summary of Results.....	6
4.	Section III: Homogeneous Areas Description.....	6
5.	Section IV: Recommendations for Response.....	14
6.	Closing Statement.....	16
7.	Appendix A: Floor Plan.....	A-1
8.	Appendix B: Photo report.....	B.1
9.	Appendix c: Laboratory Analysis Report & Chain of Custody .....	C.1
10.	Appendix D: Certifications.....	D.1

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## OVERVIEW

The following document is an **asbestos inspection report** for the Choctaw Nation. The inspection was conducted on Monday, July 7, 2025, at the property located at **529 North 16<sup>th</sup> Street, Durant, Oklahoma** by Monty Dolton, an Oklahoma licensed Asbestos Inspector LICENSE #403113. This inspection aims to assess and document potential asbestos content in various building materials, contributing to a safe environment and ensuring compliance with local, state, and federal asbestos regulations.

This inspection adheres to **ASTM Standard E2356-14** for Comprehensive Building Asbestos Surveys, which provides a structured approach to asbestos identification, sampling, and documentation. Following this standard ensures that all asbestos-containing materials are properly identified and assessed according to regulatory requirements, allowing for accurate risk assessment and informed decision-making. Additionally, the inspection follows the **AHERA (Asbestos Hazard Emergency Response Act)** guidelines, which are federal standards focused on identifying, managing, and mitigating asbestos risks within buildings. AHERA procedures are designed to ensure the safety of building occupants and workers, aligning with industry best practices for asbestos inspections and abatement.

Collected building samples were securely transported and hand-delivered to **QuantEM Laboratories** on **Monday, July 28, 2025, at 2:52 pm. QuantEM Laboratories**, a recognized and accredited laboratory, conducted comprehensive analyses on these samples to determine the presence of any asbestos-containing materials (ACM). Sampling was conducted from multiple homogeneous areas within the building and various tanks on the property using industry-standard techniques to ensure representative results.

## INSPECTION SUMMARY

A comprehensive asbestos inspection was conducted at the property located at 529 N 16th Ave, Durant, Oklahoma, a three-story building constructed around 1909, encompassing approximately 25,954 square feet. The structure features drywall and plaster walls, a variety of ceiling materials including drywall, ceiling tiles, and plaster, with a brick exterior.

To ensure precision, each of the three floors was individually inspected and sampled. The inspection identified 64 homogeneous areas, of which two were found to contain asbestos-containing materials.

Homogeneous Area 19 (HA-19), identified as Broca Ceiling Texture #1, tested positive for 6% chrysotile asbestos and is located in the front lobby ceiling texture and the assistant chief's office.

Homogeneous Area 40 (HA-40), consisting of 12x12 tan floor tiles (tile only), tested positive for 3% chrysotile asbestos and was found in the closet of Room 103. The remaining 62 homogeneous areas tested negative for asbestos-containing materials, indicating no further asbestos presence in those sampled sections of the building.

### Stronghold Environmental, LLC.

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## SUMMARY OF FINDINGS

There was a total of **64 homogeneous areas** (HA) identified during the inspection. Of the 64 homogenous areas sampled, **2 homogenous areas were found to contain asbestos fibers greater than 1%**

- **HA-19 Broca Ceiling Texture #1**                      **6% Chrysotile**
- **HA-40 12x12 Tan Floor Tile (Tile only)**                      **3% Chrysotile**

This report is organized into the following sections:

**Section I:** Definitions

**Section II:** Summary of Results

**Section III:** Homogeneous Areas Description

**Section IV:** Recommendations for Response

For further questions or clarifications, please contact **Stronghold Environmental** at 405-286-5417 or [info@strongholdenv.com](mailto:info@strongholdenv.com).

Prepared by **Stronghold Environmental** in compliance with **OSHA 29 CFR 1926.1101**, **AHERA**, and **ASTM Standard E2356-14** requirements, this report provides a thorough overview of asbestos presence within the property and serves as a reliable resource for planning any necessary abatement activities.

**Stronghold Environmental, LLC.**

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## SECTION I: DEFINITIONS

The following definitions are provided to clarify terms used in this asbestos inspection report. These definitions apply generically across inspection sites and are not specific to any single property.

- **Asbestos-Containing Building Material (ACBM):** Any building material that contains more than 1% asbestos fibers, as determined through laboratory analysis.
- **Homogeneous Area (HA):** An area of thermal system insulation (TSI), surfacing material, or miscellaneous material that is uniform in color, texture, and date of application. If any material within a homogeneous area tests positive for asbestos fibers, the entire quantity of material in that area is treated as positive for asbestos.
- **Miscellaneous Material:** Any interior building material applied to structural components or fixtures, such as floor and ceiling tiles, that does not include surfacing material or thermal system insulation.
- **Surfacing Material:** Any material applied to surfaces for acoustical, fireproofing, decorative, or other purposes, typically through spraying, troweling, or other applications.
- **Thermal System Insulation (TSI):** Insulation materials applied to pipes, fittings, boilers, tanks, ducts, or other interior structural components to prevent heat loss/gain, control condensation, or serve similar functions. Examples include pipe wrap and boiler insulation.
- **Disturbance:** Activities that alter the matrix of ACM or Presumed Asbestos-Containing Material (PACM), causing it to crumble, pulverize, or generate visible debris. Disturbance may involve small amounts of ACM or PACM removal, such as cutting to access a building component, provided the material fits within a single glove bag or waste bag (maximum dimensions: 60 inches by 60 inches).
- **Presumed Asbestos-Containing Material (PACM):** Building materials assumed to contain asbestos until proven otherwise through sampling. PACM typically includes materials such as thermal insulation and surfacing materials installed before regulatory cut-off dates.
- **Friable Material:** A material that, when dry, can be easily crumbled or reduced to powder by hand pressure. Friable ACM poses a higher risk due to the potential release of asbestos fibers into the air.
- **Non-Friable Material:** A material that cannot be easily crumbled by hand when dry. Non-friable ACM, such as vinyl floor tiles, is less likely to release asbestos fibers unless aggressively disturbed or damaged.
- **Scope of Work:** The inspection includes sampling that may require destructive testing to access and collect materials suspected of containing asbestos. Standard destructive methods, such as cutting into walls, ceilings, or flooring, are performed as necessary. However, highly invasive actions, such as breaking through walls to access hidden pipe chases or structural elements, are performed only if essential and with prior authorization.
- **Methodology:** Sampling methodologies are conducted according to industry standards such as ASTM Standard E2356-14 and AHERA guidelines. Destructive sampling is used to collect representative material samples, focusing on homogeneous areas while minimizing structural impact whenever possible.
- **Health and Safety Considerations:** Friable ACM, when found, is flagged as a potential hazard due to the ease with which fibers can be released into the air. Proper abatement and management are recommended in compliance with regulatory standards to mitigate health risks.

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## SECTION II: SUMMARY OF RESULTS

### Old Choctaw Headquarters (North Building)

HA #	Sample #	Location	Sample Descriptions	Asbestos Type (%)	Approximate Measurements
HA-19	01-03	1 <sup>st</sup> Floor Lobby and adjoining rooms and the Asst Chiefs Office	Broca Ceiling Texture #1 over Plaster	6% CH	~1,500 SF
HA-40	01-02	Closet in Room 103	12x12 Tan Floor Tile (Tile only)	3% CH	~100 SF

**Approximate Measurement Verification:** All approximate measurements provided in this report are intended solely for preliminary reference and must be independently field verified by the contractor or project designer prior to any project planning, abatement, or construction activities. Stronghold Environmental LLC makes no representations or warranties regarding the accuracy or completeness of these measurements and assumes no liability for any reliance placed upon them without proper verification. Use of these measurements without verification may result in inaccurate planning and unintended project outcomes.

\*See Floorplan for accurate locations

## SECTION III: HOMOGENEOUS AREAS DESCRIPTION

### 2<sup>nd</sup> Floor

#### HA01 – Samples 01-02 Small Fissure Ceiling Tile

This Homogeneous Area represents the **Small Fissure Ceiling Tile** found throughout the 2<sup>nd</sup> Floor. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

#### HA02 – Samples 01-07 Large Fissure Ceiling Tile

This Homogeneous Area represents the **Large Fissure Ceiling Tile** found throughout the 2<sup>nd</sup> Floor. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

#### HA03 – Samples 01-07 Orange Peel Ceiling Texture

This Homogeneous Area represents the **Orange Peel Ceiling Texture** found in some offices as a fur down ceiling on the 2<sup>nd</sup> Floor. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

#### HA04 – Samples 01-07 Associated Joint Compound

This Homogeneous Area represents the **Associated Joint Compound** of Homogenous area #03. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

#### HA05 – Samples 01-07 Associated Drywall

This Homogeneous Area represents the **Associated Drywall** of Homogenous area #03. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

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**HA06 – Samples 01-02 Plaster Ceilings**

This Homogeneous Area represents the **Plaster Ceilings** found in the North, Central, and South Stairwells. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA07 – Samples 01-02 Troweled Wall Texture**

This Homogeneous Area represents the **Troweled Wall Texture** found throughout the half of the 2<sup>nd</sup> Floor (top floor) area comprised mainly on the northern group of offices. of the building including apartments and common areas. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA08 – Samples 01-07 Associated Joint Compound**

This Homogeneous Area represents the **Associated Joint Compound** of Homogenous area #07. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA09 – Samples 01-07 Associated Drywall**

This Homogeneous Area represents the **Associated Drywall** of Homogenous area #07. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA10 – Samples 01-02 Troweled Wall Texture over Plaster Walls**

This Homogeneous Area represents the **Troweled Wall Texture over Plaster Walls** found throughout the north, central, and south stairwells, along with the hallway on the 2<sup>nd</sup> Floor (top floor). This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA11 – Samples 01-02 Common Sprayed on Plaster Wall Texture #2**

This Homogeneous Area represents the associated **Common Sprayed on Plaster Wall Texture #2** found throughout several offices on the 2<sup>nd</sup> Floor (top floor) mainly comprised along the south side of the floor. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA12 – Samples 01-02 Unfinished Plaster Wall #3**

This Homogeneous Area represents the associated **Unfinished Plaster Wall #3** found within the South Stairwell Closet. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA13 – Samples 01-07 Finished Drywall Panels**

This Homogeneous Area represents the **Finished Drywall Panels** found in the Men's Bathroom on the 2<sup>nd</sup> Floor (top floor) on the North side of the building). This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

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## 1<sup>st</sup> Floor (Ground Floor)

### HA14 – Samples 01-02                      Small Fissure Ceiling Tile

This Homogeneous Area represents the **Small Fissure Ceiling Tile** found throughout the 2<sup>nd</sup> Floor. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

### HA15 – Samples 01-07                      Large Fissure Ceiling Tile

This Homogeneous Area represents the **Large Fissure Ceiling Tile** found throughout the 2<sup>nd</sup> Floor. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

### HA16 – Samples 01-07                      Orange Peel Ceiling Texture

This Homogeneous Area represents the **Orange Peel Ceiling Texture** found in some offices as a fur down ceiling on the 1<sup>st</sup> Floor. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

### HA17 – Samples 01-07                      Associated Joint Compound

This Homogeneous Area represents the **Associated Joint Compound** of Homogenous area #16. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

### HA18 – Samples 01-07                      Associated Drywall

This Homogeneous Area represents the **Associated Drywall** of Homogenous area #16. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

### HA19 – Samples 01-02                      Broca Ceiling Texture #1 over Plaster

This Homogeneous Area represents the **Broca Ceiling Texture #1** found in Lobby area and adjacent rooms along with the Assistant Chief's Office area (See Map). This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. **This material tested POSITIVE for asbestos fibers. 6% Chrysotile.**

### HA20 – Samples 01-02                      Orange Peel Wall Texture

This Homogeneous Area represents the **Orange Peel Wall Texture** found in the along the wall separating room 116 and 116A and in the bathroom in the North stairwell of the 1<sup>st</sup> Floor. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

### HA21 – Samples 01-07                      Associated Joint Compound

This Homogeneous Area represents the **Associated Joint Compound** of Homogenous area #20. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

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**HA22 – Samples 01-07 Associated Drywall**

This Homogeneous Area represents the **Associated Drywall** of Homogenous area #20. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA23 – Samples 01-02 Heavy Troweled on Wall Texture #1 over Drywall**

This Homogeneous Area represents the **Heavy Troweled on Wall Texture #1 over Drywall** found throughout the building. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA24 – Samples 01-02 Associated Joint Compound**

This Homogeneous Area represents the **Associated Joint Compound** of Homogenous area #23. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA25 – Samples 01-02 Associated Drywall**

This Homogeneous Area represents the **Associated Drywall** of Homogenous area #23. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA26 – Samples 01-07 Heavy Troweled on Wall Texture #1 over Plaster**

This Homogeneous Area represents the **Heavy Troweled on Wall Texture #1 over Plaster** found throughout the building and hallway. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA27 – Samples 01-02 Common Sprayed on Plaster Wall Texture**

This Homogeneous Area represents the associated **Common Sprayed on Plaster Wall Texture** found throughout the offices on the south side of the building. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA28 – Samples 01-07 Medium Troweled on Wall Texture over Plaster**

This Homogeneous Area represents the **Medium Troweled on Wall Texture over Plaster** found among the lobby area. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA29 – Samples 01-07 Light Troweled on Wall Texture over Drywall**

This Homogeneous Area represents the **Light Troweled on Wall Texture over Drywall** found among the offices on the Northeast corner of the building. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

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**HA30 – Samples 01-07 Associated Joint Compound**

This Homogeneous Area represents the **Associated Joint Compound** of Homogenous area #29. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA31 – Samples 01-07 Associated Drywall**

This Homogeneous Area represents the **Associated Drywall** of Homogenous area #29. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA32 – Samples 01-02 Heavy Troweled Wall Texture #5 over Drywall**

This Homogeneous Area represents the **Heavy Troweled Wall Texture #5 over Drywall** found in the Assistant Chief's Office. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA33 – Samples 01-02 Associated Joint Compound**

This Homogeneous Area represents the **Associated Joint Compound** of Homogenous area #32. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA34 – Samples 01-07 Associated Drywall**

This Homogeneous Area represents the **Associated Drywall** of Homogenous area #32. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA35 – Samples 01-07 Wallpaper over Drywall**

This Homogeneous Area represents the **Wallpaper over Drywall** found in the Assistant Chief's Bathroom. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA36 – Samples 01-02 Wall Texture #6 over Drywall**

This Homogeneous Area represents the **Wall Texture #6 over Drywall** found in the closet within office 103 (see attached floorplan). This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA37 – Samples 01-02 Associated Joint Compound**

This Homogeneous Area represents the **Associated Joint Compound** of Homogenous area #36. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA38 – Samples 01-02 Associated Drywall**

This Homogeneous Area represents the **Associated Drywall** of Homogenous area #36. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

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**HA39 – Samples 01-07 Unfinished Plaster Walls**

This Homogeneous Area represents the associated **Unfinished Plaster Walls** found in the closet of the South stairwell. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA40 – Samples 01-07 12x12 Tan Floor Tile & Associated Mastic**

This Homogeneous Area represents the **12x12 Tan Floor Tile & Associated Mastic** found in the closet within office 103 (see attached floorplan). This material is classified as a nonfriable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. **This material tested POSITIVE for asbestos fibers. 3% Chrysotile.**

**HA41 – Samples 01-02 Painted over Drywall Paneling**

This Homogeneous Area represents the **Painted over Drywall Paneling** found in room 116. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA42 – Samples 01-02 Vinyl Sheet Flooring**

This Homogeneous Area represents the **Vinyl Sheet Flooring** found in bathroom in the North Stairwell. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

## **Basement**

**HA43 – Samples 01-07 2x2 pin hole fissure ceiling tile**

This Homogeneous Area represents the **2x2 pin hole fissure ceiling tile** found throughout the Basement. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA44 – Samples 01-07 smooth 2x2 small fissure ceiling tile**

This Homogeneous Area represents the **smooth 2x2 small fissure ceiling tile** found in the Kitchen area. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA45 – Samples 01-02 Broca Finish Wall Texture over Drywall**

This Homogeneous Area represents the **Broca Finish Wall Texture over Drywall** found throughout the Basement. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA46 – Samples 01-02 Associated Joint Compound**

This Homogeneous Area represents the **Associated Joint Compound** of Homogenous area #45. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

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**HA47 – Samples 01-07 Associated Drywall**

This Homogeneous Area represents the **Associated Drywall** of Homogenous area #45. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA48 – Samples 01-07 Knockdown Wall Texture**

This Homogeneous Area represents the **Knockdown Wall Texture** found throughout the northeast section of the basement offices. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA49 – Samples 01-02 Associated Joint Compound**

This Homogeneous Area represents the **Associated Joint Compound** of Homogenous area #48. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA50 – Samples 01-02 Associated Drywall**

This Homogeneous Area represents the **Associated Drywall** of Homogenous area #48. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA51 – Samples 01-02 Light Wall Texture - Sprayed on**

This Homogeneous Area represents the **Light Wall Texture - Sprayed on** found in room 7. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA52 – Samples 01-07 Associated Joint Compound**

This Homogeneous Area represents the **Associated Joint Compound** of Homogenous area #51. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA53 – Samples 01-07 Associated Drywall**

This Homogeneous Area represents the **Associated Drywall** of Homogenous area #51. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA54 – Samples 01-02 Troweled on Wall Texture over Plaster**

This Homogeneous Area represents the **Troweled-on Wall Texture over Plaster** found throughout the stairwells. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA55 – Samples 01-02 12x12 Black/White Floor Tile & Mastic**

This Homogeneous Area represents the **12x12 Black/White Floor Tile & Mastic** found in the central corridor. This material is classified as a nonfriable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

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**HA56 – Samples 01-02                      Black Cove Base**

This Homogeneous Area represents the **Black Cove Base** found throughout the building. This material is classified as a nonfriable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA57 – Samples 01-02                      Brown Cove Base**

This Homogeneous Area represents the **Brown Cove Base** found throughout the building. This material is classified as a nonfriable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA58 – Samples 01-07                      Beige Stair Treads**

This Homogeneous Area represents the **Beige Stair Treads** found in the stairwells. This material is classified as a nonfriable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA59 – Samples 01-07                      12x12 Purple/White Floor Tile & Mastic**

This Homogeneous Area represents the **12x12 Purple/White Floor Tile & Mastic** found in the West Corridor. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA60 – Samples 01-02                      Sprayed on Wall Texture**

This Homogeneous Area represents the associated **Sprayed on Wall Texture** found on the West section of the West corridor. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA61 – Samples 01-02                      Associated Joint Compound**

This Homogeneous Area represents the **Associated Joint Compound** of Homogenous area #60. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA62 – Samples 01-02                      Associated Drywall**

This Homogeneous Area represents the **Associated Drywall** of Homogenous area #60. This material is classified as a friable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA63 – Samples 01-07                      Plaster Ceilings**

This Homogeneous Area represents the associated **Plaster Ceilings** found throughout the Basement Extension to the West. This material is classified as a friable surfacing material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

**HA64 – Samples 01-07                      12x12 Tan Floor Tile & Mastic**

This Homogeneous Area represents the **12x12 Tan Floor Tile & Mastic** found in the controlled access closet in the Basement area. This material is classified as a nonfriable miscellaneous material. Samples were collected and tested according to Oklahoma Asbestos Regulations. This material tested **negative** for asbestos fibers.

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## SECTION IV: RECOMMENDATIONS FOR RESPONSE

For the safe management and abatement of friable and or non-friable asbestos-containing materials identified in this report, the following applicable regulatory standards and best practices shall be adopted. In instances where these standards conflict, the most stringent requirements shall apply to ensure maximum safety and compliance.

### Applicable Standards and Guidelines:

- **Oklahoma Department of Labor Asbestos Division:** Adhere to the state's Asbestos Statutes (Title 40, Sections 451-457) and Abatement of Friable Asbestos Materials Rules, which outline the requirements for the safe handling, removal, and disposal of asbestos materials.
- **29 CFR 1926:** Follow the most recent edition of the Construction Industry Standards, which include OSHA regulations specific to asbestos exposure and protective measures required in construction and renovation projects involving asbestos.
- **40 CFR 61, Subpart M (NESHAP):**
  - For removal projects involving more than 160 square feet or 260 linear feet of friable asbestos-containing material, submit the proper NESHAP notification to the Oklahoma Department of Environmental Quality (ODEQ) at least 10 days prior to the commencement of any work activities.
  - All friable asbestos abatement exceeding the NESHAP threshold will require a DOL-approved asbestos project design, an asbestos project checklist, and adherence to a 10-day notification period prior to any abatement activities.
- **ANSI Z88 (Respiratory Protection):** Follow the latest guidelines in the American National Standards Institute (ANSI) Z88 series, which provide recommendations for respiratory protection, including the selection, fit testing, and maintenance of respiratory equipment.
- **NIOSH/OSHA/USCG/EPA - "Occupational Safety & Health Guidance Manual for Hazardous Waste Site Activities":** Refer to Sections 8-20, which address heat stress and other health hazards relevant to hazardous waste site activities, including asbestos abatement.
- **Mandatory Post-Abatement Air Clearance Testing:** In compliance with **EPA and OSHA regulations**, post-abatement air clearance testing is required for all friable asbestos removal projects before the area can be re-occupied. This testing must demonstrate that airborne asbestos fiber levels meet regulatory limits, ensuring the area is safe for future use.
- **Clarification on Non-Friable Asbestos-Containing Materials (ACM):** Non-friable asbestos-containing materials, such as vinyl floor tiles or asbestos-cement products, typically do not require abatement if they are intact and undisturbed. However, these materials can pose a risk if they are damaged or disturbed, causing them to become friable and capable of releasing asbestos fibers. Proper handling and caution are advised to maintain the safety of non-friable ACM in place.

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- **Monitoring and Maintenance for ACM Left in Place:**  
For asbestos-containing materials that remain in place, periodic inspections by a qualified professional are recommended to monitor the condition of these materials. Regular monitoring helps prevent accidental fiber release due to deterioration or damage. Developing an asbestos management plan to outline necessary monitoring and maintenance activities is strongly advised for areas where ACM is left intact.
- **Legal Compliance Reminder:**  
Failure to adhere to the recommended standards and regulatory requirements may result in legal consequences, including fines and potential liability for health risks associated with asbestos exposure. Strict compliance with these recommendations is essential to ensure legal and regulatory adherence and to protect building occupants from health risks associated with asbestos.
- **Encouragement for Professional Oversight:** It is strongly recommended that any abatement, management, or monitoring activities for asbestos-containing materials be conducted under the guidance of certified asbestos professionals. Engaging licensed professionals for project planning, sampling, abatement, and post-abatement testing will ensure that all activities meet regulatory standards and industry best practices.

*This report does not prescribe specific abatement procedures or recommend specific contractors. Instead, adherence to these standards and guidelines is strongly advised to ensure safe and compliant asbestos management. For further action, consultation with a licensed asbestos abatement professional is recommended to design and execute an appropriate response plan based on the conditions identified.*

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**CLOSING STATEMENT**

This report has been prepared in accordance with applicable local, state, and federal standards to provide a thorough assessment of asbestos-containing materials within the inspected property. Our findings and recommendations are intended to assist with the safe management of asbestos in compliance with regulatory guidelines.

We appreciate the opportunity to serve you and are committed to ensuring your understanding of this report. Should you have any questions regarding the findings, recommendations, or next steps, please feel free to contact our office.

Thank you for choosing Stronghold Environmental, LLC.



Monty Dolton  
Senior Inspector/Estimator  
Stronghold Environmental  
License #403113

Reviewed by



Stronghold Environmental Quality Assurance  
Quality Control and Program Manager

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## Disclaimer

*Note: All measurements should be verified by an abatement contractor or project manager to ensure accuracy.*

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The opinions expressed herein are provided in good faith, with every effort made to ensure accuracy. However, **Stronghold Environmental, LLC** makes no representations or warranties regarding the accuracy or completeness of the information, facts, or opinions presented. **Stronghold Environmental, LLC**, its subsidiaries, directors, employees, and agents shall not be liable for any use or reliance on the opinions, estimates, forecasts, or findings within this document.

This report is based on specific sampling and analysis methodologies and applies only to the tested areas. Results should not be extrapolated to other areas without additional sampling. **The inspection may have been conducted with limited accessibility to certain areas based on property restrictions or client directives.** Consequently, some areas may not have been subjected to destructive sampling, which could impact findings. This inspection may have been limited to accessible areas only at the time of the inspection, and the findings are accurate as of the inspection date. **Stronghold Environmental LLC** does not guarantee the absence of asbestos-containing materials in untested or inaccessible areas or in conditions that may have changed post-inspection. **Stronghold Environmental, LLC** reserves the right to retest materials if additional suspected asbestos-containing materials are identified.

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All recommendations are based on available information and are intended for informational purposes only. Clients should consult licensed abatement professionals for asbestos remediation or abatement work.

This report is limited to the scope of work originally agreed upon and does not address environmental concerns that may arise outside this scope.

### **Stronghold Environmental, LLC.**

3431 N. MacArthur Blvd, Warr Acres, OK 73122

P:405-286-5417 | [info@Strongholdenv.com](mailto:info@Strongholdenv.com) | [www.Strongholdenv.com](http://www.Strongholdenv.com)



## APPENDIX A: FLOOR PLAN

This appendix provides the floor plan of the inspected property, detailing the layout and approximate room measurements. The floor plan offers a reference for understanding the property's structure, supporting the inspection findings and recommendations.

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# Positive Asbestos Locations - 1st Floor (Ground Floor)



-  = HA 19 - Broca Ceiling Texture
-  = HA 40 - 12x12 Tan Floor Tile (Tile Only)



Stronghold Environmental  
Inspection & Remediation Services  
3431 N. MacArthur Blvd  
Warr Acres, OK 73122  
(405) 286-5417

**Old Choctaw Headquarters (North Bldg)**  
**529 North 16th Avenue**  
**Durant, OK 74701**

## APPENDIX B: PHOTO REPORT

This appendix includes photographs taken during the inspection, documenting the condition of key materials and areas within the property. These images provide visual support for the findings outlined in the main report.

**Stronghold Environmental, LLC.**

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Monty Dolton

Stronghold Environmental

Aug 7, 2025 | 15 Photos



# 074-25\_Choctaw Nation\_Old HQ Bldg AB Inspection - POSITIVE SAMPLE LOCATIONS

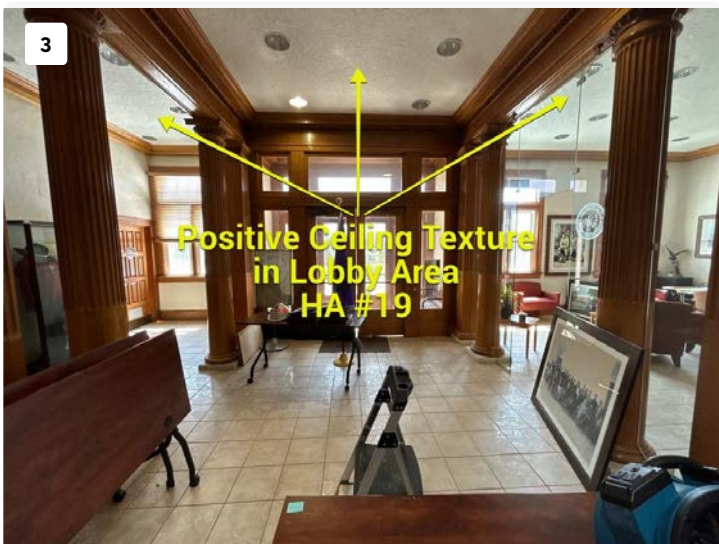




Project: Old Choctaw HQ  
Date: Jul 7, 2025, 9:54 AM  
Creator: Greg Dunn



Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:20 AM  
Creator: Greg Dunn



Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:20 AM  
Creator: Greg Dunn



Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:20 AM  
Creator: Greg Dunn



Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:21 AM  
Creator: Greg Dunn



Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:21 AM  
Creator: Greg Dunn



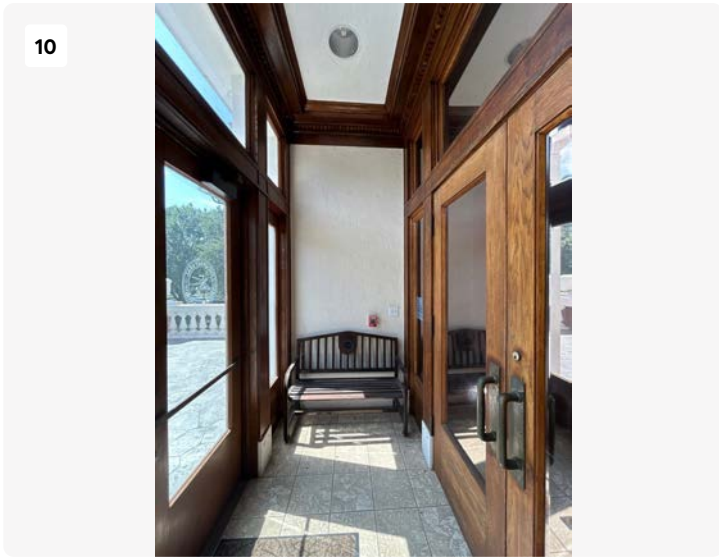
Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:21 AM  
Creator: Greg Dunn



Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:21 AM  
Creator: Greg Dunn



Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:22 AM  
Creator: Greg Dunn



Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:22 AM  
Creator: Greg Dunn



Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:47 AM  
Creator: Greg Dunn



Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:47 AM  
Creator: Greg Dunn



Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:47 AM  
Creator: Greg Dunn



Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:45 AM  
Creator: Greg Dunn



Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:45 AM  
Creator: Greg Dunn

**APPENDIX C: LABORATORY ANALYSIS REPORT & CHAIN OF CUSTODY**

This appendix presents the laboratory results for samples collected during the inspection, identifying the presence and concentration of asbestos fibers. These findings confirm which materials contain asbestos, supporting the recommendations provided in the report. This Chain of Custody document identifies all samples collected, verifying the handling and transfer of each sample from collection to analysis. This record supports the integrity of the laboratory results.

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### Polarized Light Microscopy Asbestos Analysis Report

QuanTEM Lab No. 381363

Client: Stronghold Environmental, LLC

Account Number: C151

Monty Dolton

Date Received: 07/28/2025

Received By: Charlie Johnson

Date Analyzed: 07/29/2025

Project: Choctaw Nation Old HQ North Bldg AB Insp

Analyzed By: Tanner Smith

Project Location: 529 N. 16th St, Durant, OK 74701

Methodology: EPA/600/R-93/116

Project Number: 074-25

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
001	01-01	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 50 Glass Fiber 30	Perlite Paint
002	01-02	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 50 Glass Fiber 30	Perlite Paint
003	01-03	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 50 Glass Fiber 30	Perlite Paint
004	01-04	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 50 Glass Fiber 30	Perlite Paint
005	02-01	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 50 Glass Fiber 30	Perlite Paint
006	02-02	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 50 Glass Fiber 30	Perlite Paint
007	03-01	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint

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Received By: Charlie Johnson	
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Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
008	03-02	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
009	03-03	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
010	04-01	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
011	04-02	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
012	05-01	Homogeneous	White Drywall	Asbestos Not Present	Cellulose 10 Glass Fiber 2	Gypsum
013	05-02	Homogeneous	White Drywall	Asbestos Not Present	Cellulose 10 Glass Fiber 2	Gypsum

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**Polarized Light Microscopy Asbestos Analysis Report**

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Monty Dolton

Date Received: 07/28/2025

Received By: Charlie Johnson

Date Analyzed: 07/29/2025

Project: Choctaw Nation Old HQ North Bldg AB Insp

Analyzed By: Tanner Smith

Project Location: 529 N. 16th St, Durant, OK 74701

Methodology: EPA/600/R-93/116

Project Number: 074-25

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
014	06-01	Homogeneous	Beige Plaster	Asbestos Not Present	Synthetic <1	Gypsum Sand
015	06-02	Homogeneous	Beige Plaster	Asbestos Not Present	Cellulose <1	Gypsum Sand
016	06-03	Homogeneous	Beige Plaster	Asbestos Not Present	NA	Gypsum Sand
017	07-01	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
018	07-02	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
019	07-03	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
020	07-04	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint

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Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

QuantEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
021	07-05	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
022	07-06	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
023	07-07	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
024	08-01	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
025	08-02	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
026	08-03	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3

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Monty Dolton

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Date Analyzed: 07/29/2025

Project: Choctaw Nation Old HQ North Bldg AB Insp

Analyzed By: Tanner Smith

Project Location: 529 N. 16th St, Durant, OK 74701

Methodology: EPA/600/R-93/116

Project Number: 074-25

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
027	08-04	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
028	09-01	Homogeneous	White Drywall	Asbestos Not Present	Cellulose Glass Fiber	10 2 Gypsum
029	09-02	Homogeneous	White Drywall	Asbestos Not Present	Cellulose	10 Gypsum
030	09-03	Homogeneous	White Drywall	Asbestos Not Present	Cellulose Glass Fiber	10 2 Gypsum
031	09-04	Homogeneous	White Drywall	Asbestos Not Present	Cellulose Glass Fiber	10 2 Gypsum
032	10-01	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
033	10-02	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint

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Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
034	10-03	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
035	10-04	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
036	10-05	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
037	11-01	Homogeneous	White Texture	Asbestos Not Present	NA	Paint CaCO3 Perlite
038	11-02	Homogeneous	White Texture	Asbestos Not Present	NA	Paint CaCO3 Perlite
039	11-03	Homogeneous	White Texture	Asbestos Not Present	NA	Paint CaCO3 Perlite

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### Polarized Light Microscopy Asbestos Analysis Report

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Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
040	11-04	Homogeneous	White Texture	Asbestos Not Present	NA	Paint CaCO3 Perlite
041	11-05	Homogeneous	White Texture	Asbestos Not Present	NA	Paint CaCO3 Perlite
042	12-01	Homogeneous	Beige Plaster	Asbestos Not Present	NA	CaCO3 Sand Paint
043	12-02	Homogeneous	Beige Plaster	Asbestos Not Present	NA	CaCO3 Sand Paint
044	12-03	Homogeneous	Beige Plaster	Asbestos Not Present	NA	CaCO3 Sand Paint
045	13-01	Homogeneous	Tan Panel	Asbestos Not Present	Cellulose Glass Fiber	10 2 Gypsum Vinyl

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### Polarized Light Microscopy Asbestos Analysis Report

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Analyzed By: Tanner Smith

Project Location: 529 N. 16th St, Durant, OK 74701

Methodology: EPA/600/R-93/116

Project Number: 074-25

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
046	13-02	Homogeneous	Tan Panel	Asbestos Not Present	Cellulose 10 Glass Fiber 2	Gypsum Vinyl
047	14-01	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 50 Glass Fiber 30	Perlite Paint
048	14-02	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 50 Glass Fiber 30	Perlite Paint
049	15-01	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 50 Glass Fiber 30	Perlite Paint
050	15-02	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 50 Glass Fiber 30	Perlite Paint
051	15-03	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 50 Glass Fiber 30	Perlite Paint
052	15-04	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 50 Glass Fiber 30	Perlite Paint

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### Polarized Light Microscopy Asbestos Analysis Report

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Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

QuantEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
053	16-01	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
054	16-02	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
055	16-03	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
056	17-01	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
057	17-02	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
058	18-01	Homogeneous	White Drywall	Asbestos Not Present	Cellulose Glass Fiber	5 Gypsum 2

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Analyzed By: Tanner Smith

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Methodology: EPA/600/R-93/116

Project Number: 074-25

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
059	18-02	Homogeneous	White Drywall	Asbestos Not Present	NA	CaCO3 Paint
060	19-01	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Sand Paint
061	19-02	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
062	19-03	Homogeneous	White Texture	Asbestos Present Chrysotile 6	NA	CaCO3 Perlite Paint
063	20-01	Homogeneous	White Texture	Asbestos Not Present	NA	Paint CaCO3
064	20-02	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
065	20-03	Homogeneous	White Texture	Asbestos Not Present	NA	Paint CaCO3

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Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

QuantEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
066	21-01	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
067	21-02	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
068	22-01	Homogeneous	White Drywall	Asbestos Not Present	Cellulose Glass Fiber	10 2 Gypsum
069	22-02	Homogeneous	White Drywall	Asbestos Not Present	Cellulose Glass Fiber	10 2 Gypsum
070	23-01	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
071	23-02	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint

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Project Location: 529 N. 16th St, Durant, OK 74701

Methodology: EPA/600/R-93/116

Project Number: 074-25

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
072	23-03	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
073	24-01	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
074	24-02	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
075	25-01	Homogeneous	White Drywall	Asbestos Not Present	Cellulose Glass Fiber	10 2 Gypsum
076	25-02	Homogeneous	White Drywall	Asbestos Not Present	Cellulose Glass Fiber	5 2 Gypsum
077	26-01	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
078	26-02	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint

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Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

QuantEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
079	26-03	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
080	27-01	Homogeneous	White Texture	Asbestos Not Present	NA	Paint CaCO3
081	27-02	Homogeneous	White Texture	Asbestos Not Present	NA	Paint CaCO3
082	27-03	Homogeneous	White Texture	Asbestos Not Present	NA	Paint CaCO3
083	28-01	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
084	28-02	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint

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### Polarized Light Microscopy Asbestos Analysis Report

QuanTEM Lab No. 381363

Client: Stronghold Environmental, LLC

Account Number: C151

Monty Dolton

Date Received: 07/28/2025

Received By: Charlie Johnson

Date Analyzed: 07/29/2025

Project: Choctaw Nation Old HQ North Bldg AB Insp

Analyzed By: Tanner Smith

Project Location: 529 N. 16th St, Durant, OK 74701

Methodology: EPA/600/R-93/116

Project Number: 074-25

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
085	28-03	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
086	29-01	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
087	29-02	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
088	29-03	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
089	30-01	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
090	30-02	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
091	31-01	Homogeneous	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum

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Account Number: C151

Monty Dolton

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Analyzed By: Tanner Smith

Project Location: 529 N. 16th St, Durant, OK 74701

Methodology: EPA/600/R-93/116

Project Number: 074-25

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
092	31-02	Homogeneous	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
093	32-01	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
094	32-02	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
095	32-03	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
096	33-01	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
097	33-02	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3 Gypsum Perlite

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### Polarized Light Microscopy Asbestos Analysis Report

QuanTEM Lab No. 381363	Client: Stronghold Environmental, LLC
Account Number: C151	Monty Dolton
Date Received: 07/28/2025	
Received By: Charlie Johnson	
Date Analyzed: 07/29/2025	Project: Choctaw Nation Old HQ North Bldg AB Insp
Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
098	34-01	Homogeneous	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
099	34-02	Homogeneous	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
100	35-01	Homogeneous	Tan/White Wall Paper	Asbestos Not Present	NA	Vinyl Paint
101	35-02	Homogeneous	Tan/White Wall Paper	Asbestos Not Present	NA	Vinyl Paint
102	36-01	Homogeneous	White Texture	Asbestos Not Present	NA	Paint CaCO3 Binder
103	36-02	Homogeneous	White Texture	Asbestos Not Present	NA	Paint CaCO3 Binder

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### Polarized Light Microscopy Asbestos Analysis Report

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Account Number: C151

Monty Dolton

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Date Analyzed: 07/29/2025

Project: Choctaw Nation Old HQ North Bldg AB Insp

Analyzed By: Tanner Smith

Project Location: 529 N. 16th St, Durant, OK 74701

Methodology: EPA/600/R-93/116

Project Number: 074-25

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
104	36-03	Homogeneous	White Texture	Asbestos Not Present	NA	Paint CaCO3 Binder
105	37-01	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
106	37-02	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
107	38-01	Homogeneous	Peach Drywall	Asbestos Not Present	Cellulose Glass Fiber	10 2 Gypsum
108	38-02	Homogeneous	Peach Drywall	Asbestos Not Present	Cellulose Glass Fiber	10 2 Gypsum
109	39-01	Homogeneous	Tan Plaster	Asbestos Not Present	NA	Gypsum Sand
110	39-02	Homogeneous	Tan Plaster	Asbestos Not Present	NA	Gypsum Sand

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### Polarized Light Microscopy Asbestos Analysis Report

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Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
111	39-03	Homogeneous	Tan Plaster	Asbestos Not Present	Cellulose	2 Gypsum Sand
112	40-01	Layered	Tan Floor Tile	Asbestos Present Chrysotile 3	NA	CaCO3 Vinyl
112a		Layered	Yellow Mastic	Asbestos Not Present	NA	Glue
113	40-02	Layered	Tan Floor Tile	Asbestos Present Chrysotile 3	NA	CaCO3 Vinyl
113a		Layered	Yellow Mastic	Asbestos Not Present	NA	Glue
114	41-01	Homogeneous	White Panel	Asbestos Not Present	Cellulose Glass Fiber	10 2 Gypsum

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### Polarized Light Microscopy Asbestos Analysis Report

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Account Number: C151	Monty Dolton
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Received By: Charlie Johnson	
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Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
115	41-02	Homogeneous	White Panel	Asbestos Not Present	Cellulose 10 Glass Fiber 2	Gypsum
116	42-01	Layered	Cream Sheet Vinyl	Asbestos Not Present	Cellulose 20 Glass Fiber 5	Vinyl Binder CaCO3
116a		Layered	Tan Mastic	Asbestos Not Present	NA	Glue
117	42-02	Layered	Cream Sheet Vinyl	Asbestos Not Present	Cellulose 20 Glass Fiber 5	Vinyl Binder CaCO3
117a		Layered	Tan Mastic	Asbestos Not Present	NA	Glue
118	43-01	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 50 Glass Fiber 30	Perlite Paint
119	43-02	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 50 Glass Fiber 30	Perlite Paint

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Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

QuantEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
120	43-03	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 50 Glass Fiber 30	Perlite Paint
121	43-04	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 50 Glass Fiber 30	Perlite Paint
122	44-01	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 2 Glass Fiber 80	Binder Paint
123	44-02	Homogeneous	White Ceiling Tile	Asbestos Not Present	Cellulose 2 Glass Fiber 80	Binder Paint
124	45-01	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
125	45-02	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint

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### Polarized Light Microscopy Asbestos Analysis Report

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Project: Choctaw Nation Old HQ North Bldg AB Insp

Analyzed By: Tanner Smith

Project Location: 529 N. 16th St, Durant, OK 74701

Methodology: EPA/600/R-93/116

Project Number: 074-25

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
126	45-03	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
127	45-04	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
128	45-05	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
129	46-01	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
130	46-02	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
131	46-03	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
132	47-01	Homogeneous	Off-white Drywall	Asbestos Not Present	Cellulose 10	Gypsum

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### Polarized Light Microscopy Asbestos Analysis Report

Quantem Lab No. 381363	Client: Stronghold Environmental, LLC
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Date Analyzed: 07/29/2025	Project: Choctaw Nation Old HQ North Bldg AB Insp
Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
133	47-02	Homogeneous	Off-white Drywall	Asbestos Not Present	Cellulose 10	Gypsum
134	47-03	Homogeneous	Off-white Drywall	Asbestos Not Present	Cellulose 10	Gypsum
135	48-01	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Perlite Paint
136	48-02	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Perlite Paint
137	48-03	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Perlite Paint
138	49-01	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3 Perlite

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### Polarized Light Microscopy Asbestos Analysis Report

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Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
139	49-02	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3 Perlite
140	50-01	Homogeneous	Peach Drywall	Asbestos Not Present	Cellulose 10	Gypsum
141	50-02	Homogeneous	Peach Drywall	Asbestos Not Present	Cellulose 10	Gypsum
142	51-01	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
143	51-02	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
144	51-03	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
145	52-01	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3

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**Polarized Light Microscopy Asbestos Analysis Report**

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Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
146	52-02	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
147	53-01	Homogeneous	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
148	53-02	Homogeneous	White Drywall	Asbestos Not Present	Cellulose 10	Gypsum
149	54-01	Homogeneous	Tan Texture	Asbestos Not Present	NA	Paint CaCO3 Sand
150	54-02	Homogeneous	Tan Texture	Asbestos Not Present	NA	Paint CaCO3 Sand
151	54-03	Homogeneous	Tan Texture	Asbestos Not Present	NA	Paint CaCO3 Sand

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Received By: Charlie Johnson	
Date Analyzed: 07/29/2025	Project: Choctaw Nation Old HQ North Bldg AB Insp
Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
152	55-01	Layered	Black Floor Tile	Asbestos Not Present	NA	CaCO3 Vinyl
152a		Layered	Yellow Mastic	Asbestos Not Present	NA	Glue
153	55-02	Layered	White Floor Tile	Asbestos Not Present	NA	CaCO3 Vinyl
153a		Layered	Yellow Mastic	Asbestos Not Present	NA	Glue
154	56-01	Homogeneous	Black Cove Base	Asbestos Not Present	NA	Vinyl
155	56-02	Homogeneous	Black Cove Base	Asbestos Not Present	NA	Vinyl
156	57-01	Homogeneous	Brown Cove Base	Asbestos Not Present	NA	Vinyl

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Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
157	57-02	Homogeneous	Brown Cove Base	Asbestos Not Present	NA	Vinyl
158	58-01	Layered	Purple Floor Tile	Asbestos Not Present	NA	CaCO3 Vinyl
158a		Layered	Yellow Mastic	Asbestos Not Present	NA	Glue
159	58-02	Layered	White Floor Tile	Asbestos Not Present	NA	CaCO3 Vinyl
159a		Layered	Yellow Mastic	Asbestos Not Present	NA	Glue
160	59-01	Homogeneous	Beige Stair Tread	Asbestos Not Present	NA	CaCO3 Binder

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Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

QuanTEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
161	59-02	Homogeneous	Beige Stair Tread	Asbestos Not Present	NA	CaCO3 Binder
162	60-01	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
163	60-02	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
164	60-03	Homogeneous	White Texture	Asbestos Not Present	NA	CaCO3 Paint
165	61-01	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
166	61-02	Homogeneous	White Joint Compound	Asbestos Not Present	NA	CaCO3
167	62-01	Homogeneous	White Drywall	Asbestos Not Present	Cellulose Glass Fiber	10 2 Gypsum

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Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

Quantem Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
168	62-02	Homogeneous	White Drywall	Asbestos Not Present	Cellulose 10 Glass Fiber 2	Gypsum
169	63-01	Homogeneous	Tan Plaster	Asbestos Not Present	Cellulose 2	Gypsum Sand Paint
170	63-02	Homogeneous	Gray Plaster	Asbestos Not Present	NA	CaCO3 Sand Paint
171	63-03	Homogeneous	Tan Plaster	Asbestos Not Present	Cellulose 2	Gypsum Sand Paint
172	64-01	Layered	Tan Floor Tile	Asbestos Not Present	NA	CaCO3 Vinyl
172a		Layered	Orange Mastic	Asbestos Not Present	NA	Glue

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**Polarized Light Microscopy Asbestos Analysis Report**

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Date Analyzed: 07/29/2025	Project: Choctaw Nation Old HQ North Bldg AB Insp
Analyzed By: Tanner Smith	Project Location: 529 N. 16th St, Durant, OK 74701
Methodology: EPA/600/R-93/116	Project Number: 074-25

QuantEM Sample ID	Client Sample ID	Composition	Color / Description	Asbestos (%)	Non-Asbestos Fiber (%)	Non Fibrous
173	64-02	Layered	Tan Floor Tile	Asbestos Not Present	NA	CaCO3 Vinyl
173a		Layered	Orange Mastic	Asbestos Not Present	NA	Glue

Tanner Smith, Laboratory Analyst

7/30/2025

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—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.



# 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

For Lab Use Only	
Lab No.	<u>3461363</u>
Accept	Reject

Contact Information		Project Information		Report Results (☑ one box)	
Company: <b>Stronghold Environmental</b>	Phone: <b>(405) 286-5417</b>	Project Name: <b>Choctaw Nation Old HQ North Bldg AB Insp</b>	<input type="checkbox"/> Quantem Website	<input type="checkbox"/> Email <u>Monty@strongholdenv.com</u>	<input type="checkbox"/> Other _____
Contact: <b>Monty Dolton</b>	Cell Phone: <b>(405) 808-9010</b>	Project Location: <b>529 N. 16th St, Durant, OK 74701</b>	<input checked="" type="checkbox"/>		
Account #: <b>C-151</b>	E-mail: <u>Monty@strongholdenv.com</u>	Project ID: <b>074-25</b>			
SAMPLED BY: Name: <b>Monty Dolton # 403113</b>	Date: <b>07/07/2025</b>	P.O. Number:			

RELINQUISHED BY	DATE & TIME	VIA	RECEIVED BY	DATE & TIME
<i>[Signature]</i>	<u>7/28/25 2:52 pm</u>	<u>Hand</u>	<i>[Signature]</i>	<u>7/28/25 2:53 pm</u>

### 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%]- Chatfield	<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	<b>PCM</b>	<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	<input type="checkbox"/> 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)	☑ To Be Analyzed	Color	Description	Volume / Area (as applicable)	Comments / Notes
1-4	1 01 (01-04)	<input checked="" type="checkbox"/>		Small Fissure Ceiling Tile		Test only what is described, all samples (2nd Floor)
5-6	2 02 (01-02)	<input checked="" type="checkbox"/>		Large Fissure Ceiling Tile		
7-9	3 03 (01-03)	<input checked="" type="checkbox"/>		Orange Peel Ceiling Texture		
10-11	4 04 (01-02)	<input checked="" type="checkbox"/>		Associated Joint Compound		
12-13	5 05 (01-02)	<input checked="" type="checkbox"/>		Associated Drywall		
4-16	6 06 (01-03)	<input checked="" type="checkbox"/>		Plaster Ceilings		
7-23	7 07 (01-07)	<input checked="" type="checkbox"/>		Troweled Wall Texture		
14-27	8 08 (01-04)	<input checked="" type="checkbox"/>		Associated Joint Compound		
28-31	9 09 (01-04)	<input checked="" type="checkbox"/>		Associated Drywall		
32-36	10 10 (01-05)	<input checked="" type="checkbox"/>		Troweled Texture over Plaster Walls		

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## LEGAL DOCUMENT - PLEASE PRINT LEGIBLY

Project Information						
Company: <b>Stronghold Environmental</b>			Project Name: <b>Choctaw Nation Old HQ North Bldg AB Insp</b>		Project Location: <b>529 N. 16th St, Durant, OK 74701</b>	
No.	Sample ID (10 Characters Max)	<input checked="" type="checkbox"/> To Be Analyzed	Color	Description	Volume / Area (as applicable)	Comments / Notes
37-41	11 (01-05)	<input checked="" type="checkbox"/>		Common Sprayed on Plaster Wall Texture #2		
42-44	12 (01-03)	<input checked="" type="checkbox"/>		Unfinished Plaster Wall #3		
45-46	13 (01-02)	<input checked="" type="checkbox"/>		Finished Drywall Panels		
17-48	14 (01-02)	<input checked="" type="checkbox"/>		Small Fissure Ceiling Tile		(1st Floor)
49-52	15 (01-04)	<input checked="" type="checkbox"/>		Large Fissure Ceiling Tile		
3-55	16 (01-03)	<input checked="" type="checkbox"/>		Orange Peel Ceiling Texture		
56-57	17 (01-02)	<input checked="" type="checkbox"/>		Associated Joint Compound		
58-59	18 (01-02)	<input checked="" type="checkbox"/>		Associated Drywall		
60-62	19 (01-03)	<input checked="" type="checkbox"/>		Broca Ceiling Texture #1		
3-65	20 (01-03)	<input checked="" type="checkbox"/>		Orange Peel Wall Texture		
66-67	21 (01-02)	<input checked="" type="checkbox"/>		Associated Joint Compound		
68-69	22 (01-02)	<input checked="" type="checkbox"/>		Associated Drywall		
70-72	23 (01-03)	<input checked="" type="checkbox"/>		Heavy Troweled on Wall Texture #1 over Drywall		
73-74	24 (01-02)	<input checked="" type="checkbox"/>		Associated Joint Compound		
75-76	25 (01-02)	<input checked="" type="checkbox"/>		Associated Drywall		
77-79	26 (01-03)	<input checked="" type="checkbox"/>		Heavy Troweled on Wall Texture #1 over Plaster		
80-82	27 (01-03)	<input checked="" type="checkbox"/>		Common Sprayed on Plaster Wall Texture		
83-85	28 (01-03)	<input checked="" type="checkbox"/>		Medium Troweled on Wall Texture over Plaster		
86-88	29 (01-03)	<input checked="" type="checkbox"/>		Light Troweled on Wall Texture over Drywall		
89-90	30 (01-02)	<input checked="" type="checkbox"/>		Associated Joint Compound		

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## LEGAL DOCUMENT - PLEASE PRINT LEGIBLY

Project Information						
Company: Stronghold Environmental		Project Name: Choctaw Nation Old HQ North Bldg AB Insp		Project Location: 529 N. 16th St, Durant, OK 74701		
No.	Sample ID (10 Characters Max)	<input checked="" type="checkbox"/> To Be Analyzed	Color	Description	Volume / Area (as applicable)	Comments / Notes
91-92	31	31 (01-02)	<input checked="" type="checkbox"/>	Associated Drywall		
93-95	32	32 (01-03)	<input checked="" type="checkbox"/>	Heavy Troweled Wall Texture #5 over Drywall		
96-97	33	33 (01-02)	<input checked="" type="checkbox"/>	Associated Joint Compound		
98-99	34	34 (01-02)	<input checked="" type="checkbox"/>	Associated Drywall		
00-101	35	35 (01-02)	<input checked="" type="checkbox"/>	Wallpaper over Drywall		
02-104	36	36 (01-03)	<input checked="" type="checkbox"/>	Wall Texture #6 over Drywall		
05-106	37	37 (01-02)	<input checked="" type="checkbox"/>	Associated Joint Compound		
07-108	38	38 (01-02)	<input checked="" type="checkbox"/>	Associated Drywall		
09-111	39	39 (01-03)	<input checked="" type="checkbox"/>	Unfinished Plaster Walls		
12-113	40	40 (01-02)	<input checked="" type="checkbox"/>	12x12 Tan Floor Tile & Associated Mastic		
14-115	41	41 (01-02)	<input checked="" type="checkbox"/>	Painted over Drywall Paneling		
16-117	42	42 (01-02)	<input checked="" type="checkbox"/>	Vinyl Sheet Flooring		
18-121	43	43 (01-04)	<input checked="" type="checkbox"/>	2x2 pin hole fissure ceiling tile		Basement
22-123	44	44 (01-02)	<input checked="" type="checkbox"/>	smooth 2x2 small fissure ceiling tile		
24-128	45	45 (01-05)	<input checked="" type="checkbox"/>	Broaca Finish Wall Texture over Drywall		
29-131	46	46 (01-03)	<input checked="" type="checkbox"/>	Associated Joint Compound		
32-134	47	47 (01-03)	<input checked="" type="checkbox"/>	Associated Drywall		
35-137	48	48 (01-03)	<input checked="" type="checkbox"/>	Knockdown Wall Texture		
38-138	49	49 (01-02)	<input checked="" type="checkbox"/>	Associated Joint Compound		
40-141	50	50 (01-02)	<input checked="" type="checkbox"/>	Associated Drywall		

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Lab No. <u>391363</u>	
Accept	Reject

## LEGAL DOCUMENT - PLEASE PRINT LEGIBLY

Project Information						
Company: <b>Stronghold Environmental</b>			Project Name: <b>Choctaw Nation Old HQ North Bldg AB Insp</b>		Project Location: <b>529 N. 16th St, Durant, OK 74701</b>	
No.	Sample ID (10 Characters Max)	<input checked="" type="checkbox"/> To Be Analyzed	Color	Description	Volume / Area (as applicable)	Comments / Notes
<u>42-144</u> 51	51 (01-03)	<input checked="" type="checkbox"/>		Light Wall Texture - Sprayed on		Rm 13
<u>45-146</u> 52	52 (01-02)	<input checked="" type="checkbox"/>		Associated Joint Compound		
<u>47-148</u> 53	53 (01-02)	<input checked="" type="checkbox"/>		Associated Drywall		
<u>48-150</u> 54	54 (01-03)	<input checked="" type="checkbox"/>		Troweled on Wall Texture over Plaster		
<u>52-153</u> 55	55 (01-02)	<input checked="" type="checkbox"/>		12x12 Black/White Floor Tile & Mastic		
<u>54-155</u> 56	56 (01-02)	<input checked="" type="checkbox"/>		Black Cove Base		
<u>56-157</u> 57	57 (01-02)	<input checked="" type="checkbox"/>		Brown Cove Base		
<u>58-159</u> 58	58 (01-02)	<input checked="" type="checkbox"/>		Beige Stair Treads		
<u>60-161</u> 59	59 (01-02)	<input checked="" type="checkbox"/>		12x12 Purple/White Floor Tile & Mastic		
<u>62-164</u> 60	60 (01-03)	<input checked="" type="checkbox"/>		Sprayed on Wall Texture		
<u>65-166</u> 61	61 (01-02)	<input checked="" type="checkbox"/>		Associated Joint Compound		
<u>67-168</u> 62	62 (01-02)	<input checked="" type="checkbox"/>		Associated Drywall		
<u>69-171</u> 63	63 (01-03)	<input checked="" type="checkbox"/>		Plaster Ceilings		
<u>72-173</u> 64	64 (01-02)	<input checked="" type="checkbox"/>		12x12 Tan Floor Tile & Mastic		
65		<input type="checkbox"/>				
66		<input type="checkbox"/>				
67		<input type="checkbox"/>				
68		<input type="checkbox"/>				
69		<input type="checkbox"/>				
70		<input type="checkbox"/>				

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## APPENDIX D: CERTIFICATIONS

This appendix includes certifications and/or licenses from the regulating body that has jurisdiction over the specific environmental task applicable to this report.

**Stronghold Environmental, LLC.**

3431 N. MacArthur Blvd, Warr Acres, OK 73122

P:405-286-5417 | [info@Strongholdenv.com](mailto:info@Strongholdenv.com) | [www.Strongholdenv.com](http://www.Strongholdenv.com)



# ENVIRONMENTAL MEASUREMENTS, LLC

*This is to Certify That*

## Monty Dolton

**SSN# 5619**

*Has Satisfied the Annual Training Requirements for Asbestos  
Accreditation Set Forth Under TSCA Title II, NESHAP, and OAC 380:50*

## EPA Approved Asbestos Inspector Refresher

**Certificate #: 2102516712**

April 17th, 2025

Course & Exam Completion Date



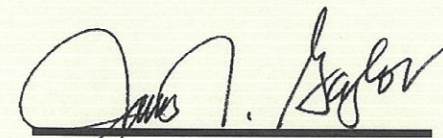
Maci Wiley, GSP

Training Program Coordinator



April 17th, 2026

Certificate Expiration Date



James R. Gaylor, CHMM  
EPA/ODOL Approved Instructor



Project: Old Choctaw HQ  
Date: Jul 7, 2025, 9:54 AM  
Creator: Greg Dunn



Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:20 AM  
Creator: Greg Dunn



Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:20 AM  
Creator: Greg Dunn

# Positive Asbestos Locations - 1st Floor (Ground Floor)



- = HA 19 - Broca Ceiling Texture
- = HA 40 - 12x12 Tan Floor Tile (Tile Only)



Stronghold Environmental  
 Inspection & Remediation Services  
 3431 N. MacArthur Blvd  
 Warr Acres, OK 73122  
 (405) 286-5417

**Old Choctaw Headquarters (North Bldg)**  
**529 North 16th Avenue**  
**Durant, OK 74701**



Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:47 AM  
Creator: Greg Dunn



Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:45 AM  
Creator: Greg Dunn



Project: Old Choctaw HQ  
Date: Jul 8, 2025, 11:45 AM  
Creator: Greg Dunn



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