



August 4, 2025

TUNKH25002

**Tunkhannock School District**

**Attn:** Mr. Paul Dougherty, Superintendent  
135 Tiger Drive  
Tunkhannock, PA 18657

**RE: AHERA 3-year Asbestos Reinspection Report  
Tunkhannock Primary Center  
99 Digger Drive, Tunkhannock, PA**

Mr. Dougherty:

The following report is provided to document the 3-Year Asbestos Reinspection conducted at Tunkhannock Primary Center, located at 99 Digger Drive, Tunkhannock, Pennsylvania. Pennoni activities were conducted in accordance with U.S. Environmental Protection Agency (USEPA) Asbestos Hazard and Emergency Response Act (AHERA) regulations, in addition to other regulatory requirements, guidelines and industry best practices, as noted in this report.

We trust that the information presented in this report is what you require at this time, and we thank you for the opportunity to assist you with this project. If you have any questions, or if you need any further assistance with this project, please contact this office at your earliest convenience.

Respectfully,

**PENNONI ASSOCIATES INC.**

A handwritten signature in blue ink, appearing to read "R. Pazzaglia".

Robert Pazzaglia  
Associate Health and Safety Professional

A handwritten signature in blue ink, appearing to read "R. DiPietro".

Rocco DiPietro, CSP  
Associate Vice President, Senior Professional

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## Background and Project Scope

### Background

Pennoni is contracted by the Tunkhannock School District (District) to provide various environmental health and safety services for their schools and support buildings located throughout Tunkhannock, Pennsylvania. Under the scope of this project, Pennoni was requested to conduct a 3-Year Asbestos Reinspection of the Tunkhannock Primary Center to meet compliance with USEPA AHERA requirements.

### Project Scope and Limitations

The objectives of the 3-Year Asbestos Reinspection were to (1) Assess the condition of previously confirmed/presumed Asbestos Containing Building Materials (ACBM), and (2) Identify/test any new materials found within the building for inclusion within the District AHERA Management Plan. Reinspection activities were performed in accordance with current USEPA and U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) regulations and guidelines, where applicable. Descriptions of all activities, findings, results, and recommendations are provided in the remaining sections of this report.

Information regarding existing ACBM at the building are based on previous inspections and the District Management Plan, in addition to abatement and limited testing reports performed by Pennoni or provided to Pennoni by the District.

This report has been completed in accordance with USEPA AHERA requirements identified at 40 CFR 763.85.

- **Protocols:** Information regarding the inspection, including dates, methods, personnel, is found in the Activities Section of this report.
- **Accreditation:** Asbestos Inspector licenses and accreditation information are found in Appendix A.
- **Newly Discovered Materials:** New suspect ACBM were not discovered during this reinspection.
- **Laboratory Analytical Reports:** New suspect ACBM were not discovered during this reinspection. Refer to previous reinspection reports for laboratory analytical reports and associated chain of custody forms.
- **Sample Location Maps:** New suspect ACBM were not discovered during this reinspection. Refer to previous reinspection reports for sample location maps.

The goal of the survey was to identify readily accessible suspect building materials. Pennoni's survey included limited invasiveness and may not have included the operational utility systems, below-grade or subfloor sampling, concealed pipe chase spaces, and any inaccessible crawlspaces associated with foundations, etc. ACBM may be present in these areas. The scope of the inspection was to meet compliance with the USEPA AHERA requirements. Additional invasive investigation measures may be required prior to renovations or demolition activities. Materials not covered under the AHERA requirements (e.g. roofing, non-building materials) are listed, but were not sampled.

### School Building Summary

A summary of the school building is provided below.

School:	Tunkhannock Primary Center
Address:	99 Digger Drive Tunkhannock, PA
Built:	1971, Renovations 2006 & 2018
Floors:	1 Floor
Size:	~77,500 square feet
Use:	Elementary School
Status:	Occupied/In use

## AHERA 3-Year Reinspection

## Activities

The Asbestos Building Reinspection was performed on July 1, 2025, by USEPA accredited and Commonwealth of Pennsylvania licensed Asbestos Building Inspector Robert Pazzaglia (see Appendix A- Inspector Credentials). Pennoni personnel were escorted by District Facilities staff throughout the reinspection. Activities were conducted outside of normal school hours while the building(s) were unoccupied by students. The reinspection included a visual and tactile review of building, inspection, sampling/quantification of previously unidentified suspect ACBM (if necessary), and visual/tactile assessment of new and previously identified ACBM. The assessment included characterization of their current condition (friable or non-friable and AHERA Damage Assessment). These activities were conducted in accordance with OSHA and USEPA regulations and associated guidance documents.

## Assessment of Asbestos Containing Building Materials

An assessment of the suspected asbestos containing building materials was conducted during the inspection to determine friability and damage.

**Friable:** Friable material in a building means that the material, when dry, may be crumbled, pulverized, or reduced to powder by hand pressure, and includes previously non-friable material after such material becomes damaged to the extent that when dry it may be crumbled, pulverized, or reduced to powder by hand pressure.

**Non-Friable:** Non-Friable means material in a building which, when dry, may not be crumbled, pulverized, or reduced to powder by hand pressure.

The condition of each homogeneous known or assumed ACBM was assessed using the USEPA AHERA classification guidelines consisting of the following:

**Source and type of damage:** Physical Contact; Water or Air Erosion; Deterioration or Material Delamination; Abrasions, Punctures, Tears, Blistering, Crumbling, etc.

**Extent of Damage:** No damage or little damage; Damaged (Less than 10% damaged, evenly distributed over the entire material or less than 25% damaged confined to a localized area of the material.); Significantly Damaged (More than 10% damaged distributed evenly over the entire material or more than 25% damaged within a localized area of the material.)

**Potential for Future Damage:** Frequency of access to material; Height of material; Location of material in a plenum; Degree of exposure of material; Accessibility of material; Presence in an area of air movement, vibrations or loud noises.

Based on the above criteria, identified known and/or assumed ACBM were classified into one of the following damage categories:

1. Damaged or significantly damaged Thermal Systems Insulation (TSI)
2. Damaged friable surfacing ACBM
3. Significantly damaged friable surfacing ACBM
4. Damaged or significantly damaged friable miscellaneous ACBM
5. ACBM with potential for damage
6. ACBM with potential for significant damage
7. Any remaining friable ACBM or friable suspect ACBM
8. Any remaining non-friable ACBM or non-friable suspected ACBM\*

\*This category is not identified by AHERA but is used in this report to further characterize the conditions of non-friable materials.

Results of the assessment are summarized in Table 1.

Table 1 - Asbestos 3-Year Reinspection Assessment Summary- Tunkhannock Primary Center (July 2025)

Material	Location	Quantity	Friability	Current Assessment	Comment
Mastic associated with floor tile, Black/ Yellow	Room 1	1,500 SF	NF	8 (No Damage)	N/A
Mastic associated with floor tile, Black/ Yellow	Room 2	1,500 SF	NF	8 (No Damage)	N/A
Mastic associated with floor tile, Black/ Yellow	Room 3	1,500 SF	NF	8 (No Damage)	N/A
Mastic associated with floor tile, Black/ Yellow	Room 4	1,500 SF	NF	8 (No Damage)	N/A
Mastic associated with floor tile, Black/ Yellow	Room 5	1,500 SF	NF	8 (No Damage)	N/A
Mastic associated with floor tile, Black/ Yellow	Room 6	1,500 SF	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 2	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 3	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 4	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 5	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 6	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 7	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 8	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 9	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 10	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 11	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 12	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 13	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 14	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	SLP	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 15	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 16	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 17	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 18	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 19	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 20	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 21	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 22	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 23	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 24	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 25	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 27	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 28	1 unit	NF	8 (No Damage)	N/A
Sink Undercoating, Black	Room 26	1 unit	NF	8 (No Damage)	N/A
Exterior Wall Panels, Multi-Color	Building Exterior	~6,000 SF	NF	8 (No Damage)	N/A

*Table 1 - Asbestos 3-Year Reinspection Assessment Summary- Tunkhannock Primary Center (July 2025)*

Material	Location	Quantity	Friability	Current Assessment	Comment
Exterior Ceiling Panels, White	Building Exterior	~8,000 SF	NF	8 (No Damage)	N/A

Table Notes:

NF: Non-Friable  
F: Friable  
SF: Square Feet  
LF: Linear Feet

## Newly Discovered Materials

Previously unidentified suspect materials were not identified during this reinspection.

## Historical AHERA Information

### Response Actions Completed from the Previous Three Years

Response actions, including abatement/removal, enclosure, encapsulation and repair, completed at the building in the timeframe since the previous reinspection are summarized in the following table. Where applicable, refer to reports provided to the District for respective projects for more information.

*Table 3 - Summary of Response Actions from Previous Three Years*

Date	Material	Location	Quantity	Response Actions
June 2024	Sink Undercoating, Black	Room 1	1 unit	Removal
June 2024	Sink Undercoating, Black	Room 26	1 unit	Removal

Table Notes:

LF: Linear Feet  
SF: Square Feet

## Historical Sampling and Analysis

The following materials were previously identified at the building as confirmed or assumed ACBM:

- Sink Undercoating, Black
- Exterior Wall Panels, Multi-Color
- Exterior Ceiling Panels, White
- Mastic associated with floor tile, Black

The following suspect materials have been identified through testing and analysis as non-ACBM:

- Yellow Mastic, associated with 12x12 Floor Tile
- 12x12 Floor Tile
  - Green with dark green mottle
  - Yellow with yellow mottle
  - Teal with dark teal mottle
  - Tan with yellow mottle
  - Yellow with red mottle
  - White with blue and red mottle
  - Peach with dark peach mottle
  - Blue with dark blue mottle
- Pipe Insulation Elbows
- Cove Base and associated mastic

- Ceiling Tiles
- Door & Window Caulking
- Joint Compound
- Sink Undercoating

## Recommendations

### Response Actions

Based on the current conditions of the listed materials, no immediate actions are needed at this time.

### Management/Administrative

Pennoni recommends continued implementation of the District's Asbestos Management Plan that identifies the following District responsibilities:

- Appointment of a Designated Person (DP) responsible for coordination of all asbestos activities.
- Development of a response plan for designated materials.
- Complete reinspections on a three-year interval basis and six-month surveillance of material identified in the initial inspection.
- Provide appropriate notifications to parents, faculty and affected personnel regarding asbestos activities.
- Notify contractors working at the building of the presence and location of ACBM.
- Provide custodial and maintenance staff with annual Asbestos Awareness Training in accordance with AHERA training requirements.
- Post warning labels on certain asbestos-containing materials.
- Appropriate recordkeeping requirements as outlined in the management plan.

Asbestos abatement activities are recommended prior to any repair, renovation, or demolition activities which would disturb the matrix of confirmed or assumed ACBM. All asbestos activities are to be performed in accordance with applicable USEPA, OSHA, and state regulatory requirements

## Appendices

## Appendix A: Inspector Credentials

