



January 19, 2026

TUNKH25002

**Tunkhannock Area School District**

**Attn:** Mr. Paul Dougherty, Superintendent  
41 Philadelphia Avenue  
Tunkhannock PA, 18657

**RE: AHERA 6 Month Surveillance Inspection  
Tunkhannock Area School District  
Tunkhannock, PA**

Mr. Dougherty:

**Pennoni** submits this report to **Tunkhannock Area School District (District)** documenting the 6-Month Asbestos Surveillance Inspections conducted for designated District buildings.

## **BACKGROUND**

**Pennoni** provides consultation for **Tunkhannock Area School District (District)** regarding management of Asbestos Containing Building Material (ACBM) for compliance with the U.S. Environmental Protection Agency (USEPA) Asbestos Hazard and Emergency Response Act (AHERA) for campus school buildings across the district. As a part of these services, Pennoni conducted the 6-Month Asbestos Surveillance Inspections for the following school buildings covered under the District AHERA Management Plans:

- Tunkhannock High School
- Tunkhannock Primary Center
- Tunkhannock Administration Building

### Activities

The periodic surveillance was conducted on December 1, 2025, by Pennoni personnel, Mr. Robert Pazzaglia, USEPA/Pennsylvania Department of Labor and Industry (PA DOLI) licensed Asbestos Inspector #061949. Each ACBM was assessed in accordance with USEPA AHERA Regulations and Guidance Documents. The survey was limited to all accessible ACBM that is listed in the current Management Plan for each building. The results of the surveillance inspections are documented on building-specific inventories included in Appendix A.

## **Conclusions and Recommendations**

Under the scope of work for 6-month inspection activities for Tunkhannock Area School District, Pennoni identified the following within the Tunkhannock High School, Tunkhannock Primary Center, and The Administration Building

- De Minimis Damage to vinyl flooring ACBM was observed within the Cafeteria in the High School. Pennoni recommends the district repair or remove the affected tiles.
- Floor Tile + Mastic (12x12 Yellow) within Room 170 office & Brown Mastic within Room 170 shop area has been confirmed Non-ACM. (See Appendix B for copies of laboratory analytical reports)
- Thermal Systems Insulation (TSI) Fittings tested within Room 164 Storage have been confirmed as ACBM. (See Appendix B for copies of laboratory analytical reports)

Maintain a copy of this report with the District AHERA Management Plan for each school. Continue to implement the requirements designated by the District AHERA Management Plan, including:


- Complete re-inspections on a three-year interval basis by a licensed PA DOLI Inspector
  - Complete six-month surveillance of designated ACBM
  - Provide appropriate notifications (annual and response actions) to parents, faculty and affected personnel regarding asbestos activities
  - Provide custodial and maintenance staff with annual Asbestos Awareness Training in accordance with AHERA training requirements
  - Appropriate recordkeeping requirements as outlined in the management plan
  - Notify employees or contractors working at the building of the presence and location of asbestos containing materials. A copy of the asbestos inspection report must be provided to each contractor involved in any renovation or demolition project.
- Asbestos abatement activities are recommended prior to any repair, renovation, or demolition activities which would disturb the matrix of confirmed or presumed ACBMs. All asbestos activities are to be performed in accordance with applicable USEPA, OSHA, and state regulatory requirements, including:
    - Notification of demolition/renovation ten (10) working days prior to asbestos related activities, as required by the NESHAP of the Clean Air Act.
    - Development of a written Asbestos Abatement Project Design Specification, dictating abatement work practices and control measures to reduce airborne fiber concentrations, waste disposal requirements, and air sample collection and analysis requirements including the final clearance (re-occupancy) criteria.
    - Selection of a licensed asbestos contractor for regulated asbestos response activities.
    - Project Monitor oversight, including air sample collection after asbestos abatement activities in compliance with project design requirements for the re-occupancy by non-protected individuals.
    - Occupant notifications concerning asbestos abatement are required 10 working days prior to their disturbance.

If you have any questions concerning this report or require additional information, please feel free to contact us.

Sincerely,

**PENNONI ASSOCIATES INC.**

  
Robert Pazzaglia  
Staff Health and Safety Professional

  
Rocco DiPietro, CSP  
Associate Vice President, Senior Professional

#### Attachments

Appendix A – Summary of Findings

Appendix B – Laboratory Analytical Reports and Chain of Custody Forms

## ***APPENDIX A***

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Summary of Findings



Material Description	Location	Quantity	Friability	Damage			Source/Type					Potential	Response Action
				No Damage	Damaged	Significant	No Damage	Physical	Water/Air Erosion	Deterioration/Delamin	Other		
12x12 Floor Tile/Mastic-green w. white, brown	Room 118	785 SF	NF		X					X		LOW	Removed Summer of 2025
12x12 Floor Tile/Mastic-green w. white, brown	Room 119	785 SF	NF		X					X		LOW	Removed Summer of 2025
12x12 Floor Tile/Mastic-green w. white, brown	Room 145	785 SF	NF	X			X					LOW	O&M
12x12 Floor Tile/Mastic-green w. white, brown	Girls Locker Room	400 SF	NF	X			X					LOW	O&M
12x12 Floor Tile/ Mastic- lt brown w. brown, white	Room 105	1,400 SF	NF	X			X					LOW	O&M
12x12 Floor Tile/ Mastic- lt brown w. brown, white	Room 106	1,400 SF	NF	X			X					LOW	O&M
12x12 Floor Tile/ Mastic- lt brown w. brown, white	Room 128	785 SF	NF		X					X		LOW	Removed Summer of 2025
12x12 Floor Tile/ Mastic- lt brown w. brown, white	Room 156	785 SF	NF	X			X					LOW	O&M
12x12 Floor Tile/ Mastic- lt brown w. brown, white	Room 159	785 SF	NF	X			X					LOW	O&M
12x12 Floor Tile/ Mastic- lt brown w. brown, white	Room 164	1,000 SF	NF	X			X					LOW	O&M
12x12 Floor Tile/ Mastic- lt brown w. brown, white	Room 165	785 SF	NF	X			X					LOW	O&M
12x12 Floor Tile/Mastic-mint with brown mottle	Room 150	1,000 SF	NF	X			X					LOW	O&M
12x12 Floor Tile/Mastic-mint with brown mottle	Room 154	785 SF	NF	X			X					LOW	O&M
12x12 Floor Tile/Mastic-mint with brown mottle	Room 163	1,200 SF	NF	X			X					LOW	O&M
12x12 Floor Tile/Mastic-mint with brown mottle	Cafeteria	1,750 SF	NF		X					X		LOW	O&M
12x12 Floor Tile/Mastic-army green w. white + dark green mottle	Cafeteria	~2,000 SF	NF		X					X		LOW	O&M
12x12 Floor Tile/Mastic-mint with brown mottle	Nurses Office	785 SF	NF	X			X					LOW	O&M
12x12 Floor Tile/Mastic-mint with brown mottle	School Services Closet	150 SF	NF	X			X					LOW	O&M
12x12 Floor Tile/Mastic-mint w. black, white mottle	Tech Room	260 SF	NF	X			X					LOW	O&M
12x12 Floor Tile - mint w. black, white mottle	Room 147	785 SF	NF	X			X					LOW	O&M
12x12 Floor Tile - mint w. black, white mottle	Room 160	785 SF	NF	X			X					LOW	O&M
				Damage			Source/Type						

Material Description	Location	Quantity		No Damage	Damaged	Significant	No Damage	Physical	Water/Air Erosion	Deterioration/Delamin	Other	Potential	Response Action
12x12 Floor Tile - mint w. black, white mottle	Room 158	785 SF	NF		X					X		LOW	Removed Summer of 2025
12x12 Floor Tile - mint w. black, white mottle	Room 161	785 SF	NF	X			X					LOW	O&M
12x12 Floor Tile- gray w. black, white mottle	Room 157	785 SF	NF	X			X					LOW	O&M
12x12 Floor Tile- tan w. blue, brown, white mottle	Room 149	785 SF	NF	X			X					LOW	O&M
12x12 Floor Tile/Mastic-army green w. white + dark green mottle	Room 123	785 SF	NF	X			X					LOW	O&M
12x12 Floor Tile/Mastic-army green w. white + dark green mottle	Room 125	785 SF	NF	X			X					LOW	O&M
12x12 Floor Tile/Mastic-army green w. white + dark green mottle	Room 146	1,000 SF	NF	X			X					LOW	O&M
12x12 Floor Tile/Mastic-army green w. white + dark green mottle	Custodian Storage	500 SF	NF	X			X					LOW	O&M
12x12 Floor Tile/Mastic-army green w. white + dark green mottle	Custodian Office	785 SF	NF	X			X					LOW	O&M
Green Cementitious Panels	Exterior	11,000 SF	NF	X			X					LOW	O&M
White Cementitious Panels	Exterior	6,000 SF	NF	X			X					LOW	O&M
Laboratory Countertops	Room 123	5	NF	X			X					LOW	O&M
Laboratory Countertops	Room 125	4	NF	X			X					LOW	O&M
Laboratory Countertops	Room 126	4	NF	X			X					LOW	O&M
Laboratory Countertops	Room 150	4	NF	X			X					LOW	O&M
Laboratory Countertops	Room 201	4	NF	X			X					LOW	O&M
Laboratory Countertops	Room 202	4	NF	X			X					LOW	O&M

F- Friable      NF- Non Friable      SF- Square Feet  
O&M- Operations and Maintenance Program

LF- Linear Feet

CT- Count

**TUNKHANNOCK PRIMARY CENTER**

Material Description	Location	Quantity	Friability	Damage			Source/Type					Potential	Response Action
				No Damage	Damaged	Significant	No Damage	Physical	Water/Air Erosion	Deterioration/Delamin	Other		
Floor Tile Mastic, Black	Room 1	1,500 SF	NF	X			X					LOW	O&M
Floor Tile Mastic, Black	Room 2	1,500 SF	NF	X			X					LOW	O&M
Floor Tile Mastic, Black	Room 3	1,500 SF	NF	X			X					LOW	O&M
Floor Tile Mastic, Black	Room 4	1,500 SF	NF	X			X					LOW	O&M
Floor Tile Mastic, Black	Room 5	1,500 SF	NF	X			X					LOW	O&M
Floor Tile Mastic, Black	Room 6	1,500 SF	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 2	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 3	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 4	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 5	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 6	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 7	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 8	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 9	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 10	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 11	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 12	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 13	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 14	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	SLP	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 15	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 16	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 17	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 18	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 19	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 20	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 21	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 22	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 23	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 24	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 25	1 CT	NF	X			X					LOW	O&M
Sink Undercoating, Black	Room 27	1 CT	NF	X			X					LOW	O&M
				Damage			Source/Type						

Material Description	Location	Quantity		No Damage	Damaged	Significant	No Damage	Physical	Water/Air Erosion	Deterioration/Delamin	Other	Potential	Response Action
Sink Undercoating, Black	Room 28	1 CT	NF	X			X					LOW	O&M
Multicolor Cementitious Panels	Exterior	8,000 SF	NF	X			X					LOW	O&M
White Cementitious Panels	Exterior	6,000 SF	NF	x			X					LOW	O&M

F- Friable      NF- Non Friable      SF- Square Feet  
O&M- Operations and Maintenance Program

LF- Linear Feet

CT- Count



ADMINISTRATION BUILDING

Material Description	Location	Quantity	Friability	Damage			Source/Type					Potential	Response Action
				No Damage	Damaged	Significant	No Damage	Physical	Water/Air Erosion	Deterioration/Delamin	Other		
9x9 Floor Tile - Brown w/ White & Black Streaks	Maintenance Break Room	400 SF	NF	X			X					LOW	O&M

F- Friable      NF- Non-Friable      SF- Square Feet      LF- Linear Feet      CT- Count  
O&M- Operations and Maintenance Program

## ***APPENDIX B***

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Laboratory Analytical Reports and Chain of Custody Forms



# EMSL Analytical, Inc.

200 Route 130 North Cinnaminson, NJ 08077

Tel/Fax: (800) 220-3675 / (856) 786-5974

<http://www.EMSL.com/cinnasblab@EMSL.com>

EMSL Order: 042523680

Customer ID: PENN36

Customer PO:

Project ID:

Attention: Rocco DiPietro

Pennoni Associates, Inc.

1337 Veterans Memorial Drive

Jessup, PA 18434

Phone: (570) 291-0030

Fax:

Received Date: 12/03/2025 11:00 AM

Analysis Date: 12/03/2025 - 12/04/2025

Collected Date: 12/01/2025

Project: TUNKH25002 - 6 Month Inspection (High School)

## Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
01A <small>042523680-0001</small>	Room 170 - Floor Mastic, Brown	Brown Non-Fibrous Homogeneous	HA: 1	100% Non-fibrous (Other)	None Detected
01B <small>042523680-0002</small>	Room 170 - Floor Mastic, Brown	Brown Non-Fibrous Homogeneous	HA: 1	100% Non-fibrous (Other)	None Detected
02A <small>042523680-0003</small>	Room 170 - 12x12 Floor Tile, Yellow	White/Yellow Non-Fibrous Homogeneous	HA: 2	100% Non-fibrous (Other)	None Detected
02B <small>042523680-0004</small>	Room 170 - 12x12 Floor Tile, Yellow	White/Yellow Non-Fibrous Homogeneous	HA: 2	100% Non-fibrous (Other)	None Detected
03 <small>042523680-0005</small>	Room 164 - TSI Fitting	Gray Fibrous Homogeneous	HA: 3	35% Min. Wool 25% Non-fibrous (Other)	40% Chrysotile

Analyst(s)

Alex Francois (2)

Megan Peters (3)

Samantha Sweeney, Laboratory Manager  
or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. Interpretation and use of test results are the responsibility of the client. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. The report reflects the samples as received. Results are generated from the field sampling data (sampling volumes and areas, locations, etc.) provided by the client on the Chain of Custody. Samples are within quality control criteria and met method specifications unless otherwise noted. The above analyses were performed in general compliance with Appendix E to Subpart E of 40 CFR (previously EPA 600/M4-82-020 "Interim Method") but augmented with procedures outlined in the 1993 ("final") version of the method. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Estimation of uncertainty is available on request.

Samples analyzed by EMSL Analytical, Inc. Cinnaminson, NJ NVLAP Lab Code 101048-0, AIHA LAP, LLC-IHLAP Lab 100194, PA ID# 68-00367, LA #04127

Initial report from: 12/04/2025 09:30:24



EMSL ANALYTICAL, INC.  
TESTING LABS • PRODUCTS • TRAINING

# Asbestos Bulk Building Materials - Chain of Custody

EMSL Order Number / Lab Use Only

EMSL Analytical, Inc.  
200 Route 130 North  
Cinnaminson, NJ 08077

PHONE: (800) 220-3675  
EMAIL: CinnAsbleb@EMSL.com

042523680

Customer Information	Customer ID:	PENN36		Billing Information	Billing ID:	SAME			
	Company Name:	Pennoni			Company Name:	SAME			
	Contact Name:	Rocco DiPietro			Billing Contact:	SAME			
	Street Address:	1337 Veterans Memorial Dr.			Street Address:	SAME			
	City, State, Zip:	Jessup, PA, 18434	Country:		USA	City, State, Zip:		Country:	
	Phone:	5702910030			Phone:				
Email(s) for Report:				Email(s) for Invoice:					
RDipietro@pennoni.com									

Project Information			
Project Name/No:		TUNKH25002 - 6 Month Inspection Sampling (High School)	
EMSL LIMS Project ID: (If applicable, EMSL will provide)		Purchase Order:	
US State where samples collected:		State of Connecticut (CT) must select project location: <input type="checkbox"/> Commercial (Taxable) <input type="checkbox"/> Residential (Non-Taxable)	
Sampled By Name:	Robert Pazzaglia	Sampled By Signature:	<i>R. Pazzaglia</i>
Date Sampled:	12-1-25	No. of Samples in Shipment:	5

Turn-Around-Time (TAT)			
<input type="checkbox"/> 3 Hour	<input type="checkbox"/> 6 Hour	<input checked="" type="checkbox"/> 24 Hour	<input type="checkbox"/> 32 Hour
<input type="checkbox"/> 48 Hour	<input type="checkbox"/> 72 Hour	<input type="checkbox"/> 96 Hour	<input type="checkbox"/> 1 Week
<input type="checkbox"/> 2 Week			

Please call ahead for large projects and/or turnaround times 6 Hours or Less. \*32 Hour TAT available for select tests only; samples must be submitted by 11:30am.

Test Selection	
<b>PLM - Bulk (reporting limit)</b> <input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%) <input type="checkbox"/> PLM EPA NOB (<1%) <input type="checkbox"/> POINT COUNT <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1,000 (<0.1%) <input type="checkbox"/> POINT COUNT w/ GRAVIMETRIC <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1,000 (<0.1%) <input type="checkbox"/> NIOSH 9002 (<1%) <input type="checkbox"/> NYS 198.1 (Friable - NY) <input type="checkbox"/> NYS 198.6 NOB (Non-Friable - NY) <input type="checkbox"/> NYS 198.8 (Vermiculite SM-V)	<b>TEM - Bulk</b> <input type="checkbox"/> TEM EPA NOB <input type="checkbox"/> NYS NOB 198.4 (Non-Friable - NY) <input type="checkbox"/> TEM EPA 600/R-93/116 w Milling Prep (0.1%)  <b>Other Tests (please specify)</b> <input checked="" type="checkbox"/> Positive Stop - Clearly Identified Homogeneous Areas (HA)

Sample Number	HA Number	Sample Location	Material Description
01A	1	Room 170	Floor Mastic, Brown
01B	1	Room 170	Floor Mastic, Brown
02A	2	Room 170	12x12 Floor Tile, Yellow
02B	2	Room 170	12x12 Floor Tile, Yellow
03	3	Room 164	TSI Fitting

Special Instructions and/or Regulatory Requirements (Sample Specifications, Processing Methods, Limits of Detection, etc.)			
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Method of Shipment:		Sample Condition Upon Receipt:	
Relinquished by:	<i>R. Pazzaglia</i>	Received by:	<i>MM</i> EFT
Date/Time:	12-1-25/1700	Date/Time:	12/3/25 11 <sup>00</sup>
Relinquished by:		Received by:	
Date/Time:		Date/Time:	

Controlled Document - Asbestos Bulk R7 9/14/2021

☐ AGREE TO ELECTRONIC SIGNATURE (By checking, I consent to signing this Chain of Custody document by electronic signature.)

EMSL Analytical, Inc.'s Laboratory Terms and Conditions are incorporated into this Chain of Custody by reference in their entirety. Submission of samples to EMSL Analytical, Inc. constitutes acceptance and acknowledgment of all terms and conditions by Customer.