



August 24, 2026

Mr. Trahn Thompson
Temporary Director of District Facilities
Palmerton Area School District
680 Fourth Street
Palmerton, PA 18071
[Email: tthompson@palmerton.org]

RE: AHERA 6-Month Periodic Surveillance Inspection (August 2026)
SSM File 100669.0027

Dear Mr. Thompson:

On August 18, 2026, Spotts, Stevens and McCoy (SSM), in accordance with the Environmental Protection Agency's (EPA) Asbestos Hazard Emergency Response Act (AHERA), conducted a six (6) month periodic surveillance inspection of the Palmerton Area School District building listed below.

- Palmerton Area High School

The periodic surveillance inspections was performed by William M. Katinowsky of SSM. Mr. Katinowsky is an accredited Building Inspector and Management Planner licensed by the PA Department of Labor and Industry (copy of license attached). Enclosed is a room-by-room inventory of asbestos-containing materials (ACM) remaining in the buildings listed above. A copy of each building report should be kept on file in the Palmerton Area High School, and this master copy is to be kept at a central asbestos file located within the Palmerton Area School District's main administrative office.

Mr. Kuchinski conducted room-by-room inspections of the Palmerton Area High School in order to locate and assess changes in condition from the previous 6-month surveillance inspection. Areas where damage to ACM was observed or quantities had changed are noted in **bold type** in the room-by-room ACM inventories. SSM reminds you to maintain all asbestos abatement or management-related documentation in the Palmerton Area High School's asbestos files, and in the district central file.

The following are materials have visible damage: Two (2) sections of fitting insulation in the corridor at the top of the stairwell/chair lift are showing cracks and delamination. SSM suggests repairing or removing the fittings. One fitting in the custodial closet by the Snack Bar is being impacted by the mop bucket that is stored in the chase. SSM suggests protecting with a hard barrier to prevent further damage to the material. One slight damaged fitting was noted in Room B-106 at the Teachers Desk. There is a fitting that is possibly damaged in the B114 custodial closet. Suggest protecting this fitting from the conduit. The District should consider removal of the asbestos-containing floor tile and mastic located to the left of the Auditorium Stage at the exterior door. The floor tile is showing wear. Currently it is covered with mat carpeting.



Additionally, there were open ceiling hatches and open areas in the ceilings that were previously covered in the storage rooms of the Boys Locker. SSM suggests that the hatches be sealed shut and the open areas covered since there are damaged fittings above the ceilings in this area.

There were no other changes in condition and/or quantity of ACM discovered during this surveillance inspection. Continue to handle existing ACM in accordance with your current Operations and Maintenance (O&M) Plan. We also remind you to continue to provide maintenance and custodial staff with annual asbestos awareness training, continue to provide annual notification to building staff, parents and guardians, and to assure that copies of all re-inspection reports and AHERA documentation are maintained in your central AHERA files and at each individual school (Main Office in a location that is easily accessible by office staff).

We would like to extend our thanks to you and your staff for their assistance and cooperation during the inspections. If you have any questions or comments pertaining to these inspections or reports, please feel free to call our office.

Very truly yours,
Spotts, Stevens and McCoy

A handwritten signature in black ink, appearing to read "D. Kuchinski", with a stylized flourish at the end.

David L. Kuchinski
Industrial Hygienist
bill.katinowsky@ssmgroup.com

Enclosure



August, 2026 AHERA 6-Month Periodic Surveillance Inspection

Palmerton Area School District

Inspection Date: August, 2026

Issue Date: August, 2026

August, 2026 AHERA 6-Month Periodic Surveillance Inspection

Prepared for: Palmerton Area School District
Palmerton, Pennsylvania

Inspection Date: August, 2026
Issue Date: August, 2026

Prepared by: Spotts, Stevens and McCoy



David L. Kuchinski
PA Licensed Asbestos Management Planner
(#31173)

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SSM File 100669.0027

**August, 2026 - AHERA 6-Month Periodic
Surveillance Inspection**

**Palmerton Area High School
3525 Fireline Road
Palmerton, PA 18071**

Prepared for:

**Palmerton Area School District
680 Fourth Street
Palmerton, PA 18071**

Prepared by:

Spotts, Stevens and McCoy
1047 North Park Road
Reading, PA 19610
SSM File 100669.0027

Updated by:



David L. Kuchinski
PA Licensed Asbestos Management Planner
(#031173)

PALMERTON AREA SCHOOL DISTRICT
PALMERTON AREA HIGH SCHOOL
AHERA 6-MONTH PERIODIC SURVEILLANCE INSPECTION REPORT
AUGUST, 2026

EXECUTIVE SUMMARY

The AHERA 6-Month Surveillance Inspection of the Palmerton Area High School was conducted by Mr. William M. Katinowsky on August 18, 2026. Mr. Katinowsky is an EPA AHERA accredited Building Inspector (BI) and Management Planner (MP), who is also licensed in the same capacity by the Pennsylvania Department of Labor and Industry (PaDLI). The surveillance inspection was performed in accordance with EPA 40 CFR, Part 763, which is commonly referred to as AHERA.

During the surveillance inspection, Mr. Katinowsky identified and assessed the condition of all known ACM, as noted in the previous inspections and re-inspections. Some damaged materials were found during this inspection. In areas where SSM could not identify ACM, as noted in the previous inspections and re-inspections, a note was added in the “comments” section of the room-by-room computer inventory.

BULK SAMPLING

There were no bulk samples collected during this inspection.

RESPONSE ACTIONS

Approximately 183 asbestos-containing fittings on fiberglass insulated pipe were abated in April and June of 2026. They fittings were removed from the Custodial/Receiving/Storage area, Room B-109 and the B-Corridor. The abatement was performed by Sargent Enterprises and clearance sample documentation was issued on April 9, 2026 and June 17, 2026. These will be included in the nest 3-Year Re-inspection report.

CONCLUSION

One fitting in the custodial closet by the Snack bar is being impacted by the mop bucket. SSM suggests protecting the material with a hard barrier to prevent further damage or simply just removing the fitting. One slight damaged fitting was noted in Room B-106 near the Teachers desk. Suggest protecting from carts and furniture. There is a fitting that is possibly damaged in the B114 custodial closet. Suggest protecting this fitting from the conduit. There were no other changes in condition and/or quantity of ACM discovered during this re-inspection. Consider removal of asbestos containing floor tile & mastic to the left of the Auditorium Stage (by exterior door). The material is showing wear. Continue to handle existing ACM in accordance with your current Operations and Maintenance (O&M) Plan. We also remind you to

continue to provide maintenance and custodial staff with annual asbestos awareness training, continue to provide annual notification to building staff, parents and guardians, and to assure that copies of all inspection reports and AHERA documentation are maintained in your central AHERA files **and** at each individual school (Main Office in a location that is easily accessible by office staff).

**PALMERTON AREA SCHOOL DISTRICT
PALMERTON AREA HIGH SCHOOL
ROOM BY ROOM INVENTORY OF ACM**

Floor	Room	Description	Quantity	LS	DC	E	AT	AF	PD	F	PA	Comments
Basement	Boy's Locker Room Chase	Fitting Insulation on FGIP	15	E	1	2	1	1	2	3	2	
Basement	Above Plaster Ceiling in Boy's Locker Room	Fitting Insulation on FGIP	**	E	1	2	1	1	2	3	2	Mostly not accessible
Basement	Above Plaster Ceiling in Boy's Locker Room	Fitting Insulation on FGIP	2	E	3	2	1	1	2	3	2	Suggest closing hatches
Basement	Above Plaster Ceiling in Boy's Locker Room	Fitting Insulation on FGIP	1	E	10	2	1	1	2	3	2	Suggest closing hatches
Basement	Above Plaster Ceiling in Boy's Locker Room	Fitting Insulation on FGIP	17	E	1	2	1	1	2	3	2	Visible through opened hatches
Basement	Back Stairwell to Boy's Locker Room	Fitting Insulation on FGIP	2	E	1	2	1	1	2	3	2	
Basement	Custodial/Receiving/Storage (B102)	Fitting Insulation on FGIP	0	E	0	0	0	0	0	0	0	All fittings have been removed Spring of 2026
First Floor	A113 Snack Bar	9" x 9" Floor Tile	178	S	0	4	1	1	1	1	1	2 tiles missing, some cracks
First Floor	A113 Snack Bar	9" x 9" Floor Tile Mastic	180	S	0	4	1	1	1	1	*	
First Floor	A-115 Custodial Closet	Fitting Insulation on FGIP	3	E	1	2	1	1	2	3	2	2 visible below ceiling
First Floor	A-115 Custodial Closet	Fitting Insulation on FGIP	1	E	1	2	1	1	2	3	2	Fitting under sink
First Floor	A-115 Pipe Chase	Fitting Insulation on FGIP	14	E	1	2	1	1	2	3	2	
First Floor	A136 Storage	Fitting Insulation on FGIP	2	E	1	2	1	1	2	3	2	1 covered with duct tape
First Floor	Air Handler Rooms	Fitting Insulation on FGIP	12	E	0	0	0	0	0	0	0	
First Floor	Auditorium Ceiling	Acoustical Ceiling Plaster	4,980	S	1	3	2	1	2	3	*	
First Floor	B106	Fitting Insulation on FGIP	16	E	1	2	1	1	2	3	2	5 in Mezz; 6 @ heater unit; 6 @ teacher desk
First Floor	B106	Fitting Insulation on FGIP	1	E	3	2	1	1	2	3	2	Near teacher's desk
First Floor	Corridor outside B106	Fitting Insulation on FGIP	0	E	0	0	0	0	0	0	0	Fitting Removed Spring of 2026
First Floor	B109-Art	Fitting Insulation on FGIP	12	E	1	2	1	1	2	3	2	
First Floor	B109-Art	Fitting Insulation on FGIP	0	E	0	0	0	0	0	0	0	Fitting Removed Spring of 2026
First Floor	B114 Custodian Closet	Fitting Insulation on FGIP	2	E	1	2	1	1	2	3	2	
First Floor	B114 Custodian Closet	Fitting Insulation on FGIP	1	E	3	2	1	1	2	3	2	Recommend protecting from conduit
First Floor	B119	Fitting Insulation on FGIP	2	E	1	2	1	1	2	3	2	
First Floor	B129	Fitting Insulation on FGIP	8	E	1	2	1	1	2	3	2	Formerly ISS Room
First Floor	Pipe Chase at Room B143	Fitting Insulation on FGIP	1	E	1	2	1	1	2	3	2	May be fiberglass
First Floor	Corridor	Fitting Insulation on FGIP	30	E	1	2	1	1	2	3	2	Estimated, many removed Spring of 2026
First Floor	Corridor	Fitting Insulation on FGIP	1	E	3	2	1	1	2	3	2	Fitting Removed Spring of 2026
First Floor	Corridor	Fitting Insulation on FGIP	2	E	3	2	1	1	2	3	2	Fitting Removed Spring of 2026
First Floor	Corridor	Fitting Insulation on FGIP	1	E	10	2	1	1	2	3	2	Fitting Removed Spring of 2026
First Floor	Incinerator Room	Fitting Insulation on FGIP	7	E	1	2	1	1	2	3	2	
First Floor	Main Office-Old Athletic Director's Room	9" x 9" Floor Tile	80	S	0	4	1	1	2	1	1	Under carpet
First Floor	Main Office	9" x 9" Floor Tile	2,130	S	0	4	1	1	1	1	1	All Under carpet
First Floor	Main Office	9" x 9" Floor Tile Mastic	2,130	S	0	4	1	1	1	1	*	
First Floor	Vault in Main Office	9" x 9" Floor Tile Mastic	40	S	0	4	1	1	1	1	*	
First Floor	Vault in Main Office	Light Shields	2	S	0	1	0	1	2	1	*	
First Floor	Gymnasium	Fitting Insulation on FGIP	6	E	1	2	1	1	2	3	2	Northeast corner of Gym
First Floor	Kitchen Storage	9" x 9" Floor Tile	385	S	0	4	1	1	1	1	1	
First Floor	Kitchen Storage	9" x 9" Floor Tile	15	S	2	4	1	1	1	1	1	Some missing tiles
First Floor	Kitchen Storage	9" x 9" Floor Tile Mastic	400	S	0	4	1	1	1	1	*	
First Floor	Auditorium (front middle seat section)	9" x 9" Floor Tile	120	S	0	4	1	1	1	1	1	
First Floor	Auditorium (front middle seat section)	9" x 9" Floor Tile Mastic	120	S	0	4	1	1	1	1	*	
First Floor	Stage, Right Side	9" x 9" Floor Tile	158	S	0	4	1	1	1	1	1	Missing tiles

FGIP = Fiberglass Insulated Pipe

*** Assumed to contain asbestos**

BOLD= Changes in quantity or condition since previous inspection, or damaged ACM (DC-3 or greater)

Revised: August, 2026

SSM File 100669.0027

**PALMERTON AREA SCHOOL DISTRICT
PALMERTON AREA HIGH SCHOOL
ROOM BY ROOM INVENTORY OF ACM**

Floor	Room	Description	Quantity	LS	DC	E	AT	AF	PD	F	PA	Comments
First Floor	Stage, Right Side	9" x 9" Floor Tile Mastic	162	S	0	4	1	1	1	1	*	
First Floor	Stage, Left Side	9" x 9" Floor Tile	158	S	0	4	1	1	1	1	1	
First Floor	Stage, Left Side	9" x 9" Floor Tile	6	S	2	4	1	1	1	1	1	Missing tiles, some damage
First Floor	Stage, Left Side	9" x 9" Floor Tile Mastic	162	S	0	4	1	1	1	1	*	
First Floor	Stage, Left Side	Fitting Insulation on FGIP	2	E	1	2	1	1	2	3	2	
First Floor	Storage Above Auditorium	Fitting Insulation on FGIP	6	E	1	2	1	1	2	3	2	4 are assumed
First Floor	Storage Next to Stage (right)	Fitting Insulation on FGIP	14	E	1	4	2	1	3	3	2	
First Floor	Women's Faculty Bathroom at B129	9" x 9" Floor Tile	60	S	0	4	1	1	1	1	1	Loose tiles, cracks
First Floor	Women's Faculty Bathroom at B129	9" x 9" Floor Tile Mastic	60	S	0	4	1	1	1	1	*	
First Floor	Corridor Intersection near Library	Fitting Insulation on FGIP	0	E	0	0	0	0	0	0	0	Fitting Removed Spring of 2026
Second Floor	Custodial Room (B214)	Fitting Insulation on FGIP	1	E	1	2	1	1	2	3	2	under sink
Second Floor	B217 Closet	9"x9" Floor Tile Mastic	10	S	0	4	1	1	1	1	*	May be under new 1'x1' tile
Second Floor	B234	Transite Fume Hood Panels	100	S	0	1	1	4	2	1	*	
Throughout	Throughout	Black Board/Tack Board Mastic	**	S	0	0	0	1	1	0	*	**= Not quantified, assumed
Throughout	In walls and above plaster ceilings	Fitting Insulation on FGIP	**	E	1	2	1	1	2	3	2	**= Not quantified
Throughout	Throughout Classrooms	Transite Window Sills	**	E	1	2	1	1	2	3	*	Assumed

FGIP = Fiberglass Insulated Pipe

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BOLD= Changes in quantity or condition since previous inspection, or damaged ACM (DC-3 or greater)

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Algorithm Values

ALGORITHM VALUES - SHORT FORM

Damaged Condition (DC)	-	0 Intact, Encapsulated 1 Intact, Minor Water Stain 2 Intact, Cover Poor, Moderate Stain, No Damage 3 Minor Damage, Scrapes, etc., Duct Tape Repair 5 Damage, Fix with Patch, Repair and Encapsulate 7 Significant Damage, Some Removal Needed 10 Very Significant Damage, Removal Mandated
Exposure Factor (E)	-	0 Inaccessible or Non-friable 1 Very Limited Access 2 Maintenance Area Like Boiler Room or Above 2x4's 3 Public Area, 10 Feet and Higher 4 Public Area, 10 Feet and Lower
Activity Level (AT)	-	0 Behind Walls, Locked Closet, etc. 1 Low or Medium Usage (1-3 Persons, 8 Hr/Day) 2 #1 with Vibration or Public Area 4 High Activity (Gym, Loading Dock) and/or High Vibration
Air Flow Factor (AF)	-	0 No Impingement, Little or No Air Flow 1 Low Air Flow or Air Velocity, No Impingement 2 Air Stains, Moderate Velocity, Piston Effect 4 High Air Velocity, Air Erosion
Potential Damage (PD)	-	0 No ACM 1 ACM, No Potential Damage 2 Possible Potential Damage 3 Potential Damage Expected 4 Possible Significant Potential Damage 5 Significant Potential Damage Expected
Friability (F)	-	1 Non-Friable, Behind Walls, etc. 2 Encapsulated, Ceiling Tile, Hard Surface 3 Friable - Standard ACM and Fittings 5 Highly Friable - Delaminating, "Fluffy" Fireproofing
Percent Asbestos (PA)	-	0 = No ACM 1 = >1% but <25% - Chrysotile Only 2 = 25% to 80% - Chrysotile Only 3 = >80% - or any percentage of amosite, crocidolite, anthophyllite, tremolite or actinolite
Linear Feet (L) Square Feet (S)	-	Refers to quantity of ACM L Linear Feet S Square Feet

Accreditations

PENNSYLVANIA ASBESTOS CERTIFICATION

031173 Birth Date
09/05/1965

DAVID L KUCHINSKI
402 W WYOMISSING BLVD
WEST LAWN PA 19609

Expires 09/09/2026 Issue Date 10/06/2025

Sex M Height 6' 05" Eyes HZL

Dr. K Class
MANAGEMENT PLANNER



SPOTTS | STEVENS | MCCOY

ssmgroup.com

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