

CAPTION SHEET

CASE MANAGEMENT SYSTEM

1. REPORT DATE: 00/00/00 :  
 2. BUREAU: ALJ :  
 3. SECTION(S): :  
 4. PUBLIC MEETING DATE: 00/00/00 :  
 5. APPROVED BY: :  
 DIRECTOR: :  
 SUPERVISOR: :  
 6. PERSON IN CHARGE: :  
 7. DATE FILED: 10/26/05 :  
 8. DOCKET NO: C-20055501 :  
 9. EFFECTIVE DATE: 00/00/00 :

*REVISED*

PARTY/COMPLAINANT: DAVID, LINDA L.

RESPONDENT/APPLICANT: PPL ELECTRIC UTILITIES CORP ET AL

COMP/APP COUNTY: LEHIGH

UTILITY CODE: 110500

ALLEGATION OR SUBJECT

COMPLAINANT STATES THERE IS A SAFETY PROBLEM WITH HER UTILITY SERVICE. SHE WOULD LIKE THE PUC TO HAVE THE JUDICIAL AUTHORITY HAVE THE TOWNSHIP AND THE COMPANY CORRECT THE AMOUNT OF ELECTRICITY RUNNING THROUGH THE WATER PIPES. WATER PUMPS NEED TO ALSO BE INSULATED. ONE PUMP RUNS DURING THE DAY AND THE VIBRATIONS ARE MINIMAL AND THREE PUMPS RUN AFTER MIDNIGHT WHICH IS WHEN COMPLAINANT IS AWAKENED AND BURNED. ADDITIONAL RESPONDENTS: CITY OF ALLENTOWN WATER AUTHORITY & SOUTH WHITEHALL TOWNSHIP.....

DOCUMENT FOLDER

**DOCKETED**  
JAN 12 2006

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

RECEIVED

OCT 26 2005

Please print or type.

C-20055501

110500

1. CUSTOMER NAME (COMPLAINANT)

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Your name, mailing address, county, telephone number, utility account number and service address:

Name LINDA L. DAVID

Street/P.O. Box 2922 W. FAIRVIEW ST. Apt # \_\_\_\_\_

City ALLENTOWN State PA Zip 18103

County LEHIGH

ORIGINAL

Area Code/HOME Phone 610-740-0637

Area Code/WORK Phone Retired Teacher

Utility Account Number 59690-09000  
(from your bill)

If your complaint involves utility service provided to a different address than your mailing address, please list this information below.

Name \_\_\_\_\_

Street/P.O. Box \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: PPL

3. TYPE OF UTILITY (check one)

ELECTRIC

STEAM HEAT

GAS

WASTE WATER

WATER

MOTOR CARRIER

(taxi, moving company, limousine)

TELEPHONE

(local, long distance)

SOUTH WHITEHALL  
TOWNSHIP

ALLENTOWN  
WATER  
AUTHORITY

50

4. COMPLAINT (check one)

A. In general, what is your complaint?

- I want to oppose the company's proposed rate increase.
- There are incorrect charges on my bill.
- There is a reliability, safety or quality problem with my utility service.
- I received a notice that my utility service is being terminated.
- I would like a payment agreement.
- Other.  
(explain)

B. State the facts of your complaint.

Include any specific dates, times or places that are important. If the complaint is about a bill, tell us about any charges that you believe are not correct. Use additional paper if you need more space. Provide copies of all relevant documents you believe will support your complaint.

A water pumping station has been placed 200' from my home. Vibrations can be felt through the furniture, and electrical impulses. Pumps are not insulated!! 6 AMPS of electricity are running in water pipes. Had private testing done by an electrical engineer.

What do you want the Public Utility Commission to do about your complaint? Use additional paper if you need more space.

Someone needs to have the judicial authority to have the township (South Whitehall) and PPL correct the amount of electricity running in the water pipes. Water pumps need to be insulated! One pump runs during the day - vibrations, then, are minimal. Three pumps run after midnight; that's when I'm awakened and burned.

My face, arms, legs get red  
 burn marks just from sleeping in  
 my own bed.

6. PROTECTION FROM ABUSE

Answer the following question if your complaint is against a natural gas distribution company, an electric distribution company or a water company AND your complaint is about a billing problem, an application for service problem, a termination of service problem or a request for a payment agreement.

Has a court granted a "Protection from Abuse" order for your personal safety?

YES

NO

7. PRIOR UTILITY CONTACT

Answer the following question only if you are a residential customer and your complaint is against an electric distribution utility, natural gas distribution utility or a water distribution utility.

Have you spoken to a utility company representative about this complaint?

YES

(includes appeals of BCS determinations)

NO

If you tried to, but could not speak to a utility company representative about your complaint, please explain why.

8. VERIFICATION AND SIGNATURE

You must print or type your name below on the line provided for the verification paragraph, and you must sign and date (in ink) this form on the lines provided.

Verification: I LINDA DAVID, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Linda L. David  
(Signature)

Oct. 18, 2005  
(Date)

9. **LEGAL REPRESENTATION (IF ANY)**

If you are represented by a lawyer in this matter you must provide your lawyer's name, address and telephone number.

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Area Code/Phone Number \_\_\_\_\_

10. **FILING**

Please return the completed form to one of the addresses listed below:

If using U.S. Postal Service:

If using overnight delivery service:

Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105	Secretary Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building, 2 <sup>nd</sup> Floor Harrisburg, Pennsylvania 17120
--	--

Facsimiles and/or electronic filings of the complaint form will not be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

**Keep a copy of your complaint for your records.**

TOM CORBETT  
ATTORNEY GENERAL



COMMONWEALTH OF PENNSYLVANIA  
OFFICE OF ATTORNEY GENERAL

BUREAU OF CONSUMER PROTECTION

Allentown Regional Office  
801 Hamilton Street, 4th Floor  
Allentown, PA 18101  
(610) 621-6690  
Fax: (610) 621-6529

February 2, 2005

Linda L. David  
2922 W. Fairview St.  
Allentown, PA 18103

Re: South Whitehall Township, G-000345-2005

Dear Ms. David:

Your complaint has been received by the Bureau of Consumer Protection and will be reviewed by Sarah Furedi. To help in keeping accurate and up-to-date records when corresponding with this office, please refer to our file number, G-000345-2005.

The Bureau will attempt to resolve your complaint within a reasonable length of time based substantially on the information you have presented to us. We will attempt to keep you advised of significant developments as your case progresses.

If your complaint has been settled or if you have new information that would have a bearing on your complaint, please inform our agent. We encourage you to submit such information in writing. Due to the substantial number of cases handled by each agent, we can handle your complaint more efficiently if your additional information or inquiries are submitted in writing. If, however, your special circumstances make telephone contact with us necessary, we will make every effort to take your call and discuss your case with you. If you find that it is necessary to meet with the agent, please call or write to schedule an appointment.

On behalf of the Office of Attorney General we thank you for bringing this matter to our attention. We hope to be of assistance in resolving your complaint.

Very truly yours,

*Sarah Furedi/SAP*  
Sarah Furedi  
Consumer Protection Agent

elm  
20A

TOM CORBETT  
ATTORNEY GENERAL



COMMONWEALTH OF PENNSYLVANIA  
OFFICE OF ATTORNEY GENERAL

BUREAU OF CONSUMER PROTECTION

Allentown Regional Office  
601 Hamilton Street, 4th Floor  
Allentown, PA 18101  
(610) 821-6690  
Fax: (610) 821-6529

March 7, 2005

Linda L. David  
2922 W. Fairview St.  
Allentown, PA 18103

Re: South Whitehall Township, G-000345-2005

Dear Ms. David:

We wanted to provide you with a report of our review of your complaint against South Whitehall Township.

We sincerely regret that under the present consumer protection laws of Pennsylvania, the Bureau of Consumer Protection does not have authority to pursue the matter presented in your complaint. You may wish to discuss your problems with private legal counsel. This agency may be able to provide advice or assistance to help you.

Even though the Bureau was unable to assist you in resolving your problem, this does not mean you do not have a valid complaint. Only a Court may determine what rights you have in this matter and order the remedy you seek. If you wish to continue pursuing your complaint, you may consult with an attorney or you may file an action with your local district justice. Proceedings before a district magistrate, or small claims court, may often be very informal and inexpensive. We have enclosed relevant information on these proceedings for your information and review.

We appreciate your concern and you may be assured that your communication will be entered into our permanent files for possible future use. Thank you for bringing this matter to our attention. If we can be of assistance in the future, do not hesitate to contact the Bureau of Consumer Protection.

Very truly yours,

A handwritten signature in cursive script that reads "Sarah Furedi".

Sarah Furedi  
Consumer Protection Agent

elm  
Enc.  
23

TOM CORBETT  
ATTORNEY GENERAL



COMMONWEALTH OF PENNSYLVANIA  
OFFICE OF ATTORNEY GENERAL

BUREAU OF CONSUMER PROTECTION

Allentown Regional Office  
801 Hamilton Street, 4th Floor  
Allentown, PA 18101  
Tel: (610) 821-6690  
Fax: (610) 821-6529

April 21, 2005

Linda L. David  
2022 W. Fairview St.  
Allentown, PA 18103

Re: South Whitehall Township, G-000345-2005

Dear Ms. David:

We have received your request for information from the Bureau of Consumer Protection.

Enclosed are materials which should be of assistance to you.

On behalf of the Office of Attorney General we thank you for your interest in consumer protection and the Bureau. Please advise us if we can be of further assistance.

Very truly yours,

A handwritten signature in cursive script that reads "Sarah Furedi".

Sarah Furedi  
Consumer Protection Agent

eim  
Encs.  
22

PENNSYLVANIA  
OFFICE OF ATTORNEY GENERAL



CONSUMER COMPLAINT FORM

GERALD J. PAPPERT  
ATTORNEY GENERAL

www.attorneygeneral.gov

Office Use Only Investigator:  
Complaint #

62005-0345LF

Code 1

350

Code 2

820

RECEIVED

Bureau of Consumer Protection  
801 Hamilton Street, 4th Floor  
Allentown, PA 18101  
(610) 821-6690

JAN 18 2005

YOUR NAME Linda L. David Office of Attorney General  
ADDRESS 2922 W. Fairview St.  
CITY Allentown, PA STATE PA ZIP CODE 18103 COUNTY Lehigh  
HOME PHONE NUMBER (610) 710-0637 BEST NUMBER TO CALL DURING THE DAY

NAME OF BUSINESS COMPLAINT IS AGAINST South Whitehall Township - The Pidcock Co.  
NAME OF OWNER OR OTHER INDIVIDUAL TO WHOM YOU COMPLAINED PPL - Allentown Water Authority STEVE HENNING Environmental Manager  
ADDRESS Complaints were made to all of the above.  
CITY STATE ZIP CODE COUNTY

PRODUCT(S) OR SERVICE(S) PURCHASED	DATE OF PURCHASE	PURCHASED PRICE

To what other agencies have you complained? EPA, DEP, MAJOR'S Office, EPA sent 2 engineers to my home.

What action was taken? None - PPL did test, etc.

Have you retained an attorney?  Yes  No  
If yes, please provide your attorney's name, address and telephone number

Louisa Chen, Attorney at Law, White and Williams LLP  
1800 One Liberty Place, Philadelphia, PA

Have you filed a court action?  Yes  No  
If yes, please state WHEN, WHERE and WHAT decision was made?

19103-7395  
(215) 864-7000

- Your Age:
- 18-29
  - 30-44
  - 45-59
  - 60 or older

- How did you find out about us?
- Visited Office
  - Attended County Senior Fair or Speaking Engagement
  - State Legislator/Agency
  - News Story
  - Internet
  - Other
- Please Specify:  
Internet?

(This information will be used for Statistical & Enforcement Purposes Only)

1-800-441-2555

Please explain your complaint. You may use additional sheets if necessary. Please print or type clearly. Try to be brief, but be sure to tell **WHAT** happened, **WHEN** it happened and **WHERE** it happened. Be specific about any oral statements the business made to you, **ESPECIALLY** those that influenced you to deal with the company. Describe events in the order in which they happened. Attach **COPIES** of all contracts, letters, receipts, canceled checks (front & back), advertisements or any other papers that relate to your complaint.

The enclosed letter to Senator Santorum's office explains the situation here at my home. I also sent a letter to the editor - Morning Call, which was not printed.

WHAT WOULD YOU LIKE THE BUSINESS TO DO TO SETTLE YOUR COMPLAINT?

South Whitehall Township and the Pidcock Co. need to sound isolate the pumps and put proper insulation pads under the pumps!! My house needs to be repaired or bought.

**PLEASE READ CAREFULLY**

The Attorney General cannot act as your private attorney. As a law enforcement agency, the primary function of the Office of Attorney General is to represent the public at large by enforcing laws prohibiting fraudulent or deceptive trade practices.

The information you provide will be used in an attempt to resolve your complaint and will be shared with the party complained against.

Through the Bureau of Consumer Protection, the Attorney General does provide as a service to consumers the Consumer Mediation Unit, where an attempt may be made to mediate individual consumer complaints. Your complaint will remain on file with our office and the information contained in it may be used to establish violations of Pennsylvania Law.

I certify that the information provided is true and correct to the best of my knowledge, information and belief.

Linda L. David  
YOUR SIGNATURE

Jan. 7, 2005  
DATE

RICK SANTORUM  
PENNSYLVANIA

REPUBLICAN CONFIDENCE  
CHAIRMAN

WASHINGTON DC  
511 URSSON SENATE OFFICE BUILDING  
WASHINGTON DC 20510  
(202) 224-6329

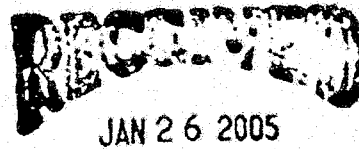
# United States Senate

<http://santorum.senate.gov>

H-2005-0207  
COMMITTEES  
FINANCE  
BANKING HOUSING AND URBAN AFFAIRS  
RULES AND ADMINISTRATION  
SPECIAL COMMITTEE ON AGING  
350/900  
Allentown

January 13, 2005

The Honorable Gerald Pappert  
Attorney General  
Bureau of Consumer Protection  
132 Kline Village  
Harrisburg, Pennsylvania 17104-1579



Office of Attorney General

RECEIVED

JAN 19 2005

Office of Attorney General

Dear Attorney General Pappert:

Ms. Linda David, a constituent of mine, recently contacted my office regarding her concerns. The enclosed information is submitted for your consideration.

I appreciate your taking the time to look into this matter on my behalf. Please respond to me at my Allentown office.

Sincerely,

Rick Santorum  
United States Senate

RJS:tep  
Encl:

- ALLENTOWN  
800 FEDERAL OFFICE BUILDING  
504 WEST HAMILTON STREET  
ALLENTOWN, PA 18105  
(610) 770-3142
- ALTOONA  
REGENCY SQUARE  
SUITE 202  
RUBY 220 NORTH  
ALTOONA, PA 16601  
(814) 946-7023
- COOKESPORT  
81 MARSH HILL ROAD  
COOKESPORT, PA 16805  
(814) 274-9773
- ERIE  
1705 WEST 26TH STREET  
ERIE, PA 16514  
(814) 454-7114
- HARRISBURG  
555 WALNUT STREET  
FIRST FLOOR  
HARRISBURG, PA 17101  
(717) 231-2540
- PHILADELPHIA  
WEDGEMAN BUILDING  
ONE SOUTH PENN SQUARE  
SUITE 900  
PHILADELPHIA, PA 19107  
(215) 664-6900
- PITTSBURGH  
400 WEST STATION SQUARE DRIVE  
LANDMARK BUILDING  
SUITE 250  
PITTSBURGH, PA 15219  
(412) 562-6533
- SCRANTON  
527 LINDEN STREET  
SCRANTON, PA 15503  
(570) 344-8700

**Linda L David**

2922 W. Fairview St.  
Allentown, PA 18103  
Telephone: 610 740-0637

October 2, 2004

Senator Rick Santorum  
504 Hamilton St  
Allentown, PA 18101

Dear Senator Santorum,

In July, I spoke to Mark Rogers concerning a serious problem in my home which he had previously discussed with a mutual friend, Paul Weiss. He told me the federal government doesn't usually get involved with problems of this nature, but sometimes studies are done in this regard.

South Whitehall Township has put three water pumps in a station placed 200 feet from my front door. It is located behind the Veterans' Clinic on Hamilton Boulevard. As I understand, one pump runs continuously and all three run throughout the night. There are no sound isolators in place, nor are there any insulated pads underneath the large pumps. A Verizon engineer told me I should feel nothing if there were pads in place.

My house is a ranch without a basement, so the vibrations are causing cracks in walls and ceilings. The ground shakes on the property.

I was getting strong electrical impulses surging through all of the furniture. It has somewhat lessened now, but there are times when it is just not tolerable. My skin gets red blotches, and I think electricity is surging into me and the poor cat, as well. This has been a nine-month nightmare.

I've contacted 20 or 30 people and am at a standstill. South Whitehall says it isn't their pumps. It absolutely is.

Most recently I paid an electrical engineer to do testing in my home. Al Loch from Trinity Associates, Inc. from Swarthmore found six amps of electricity running through the water pipes and matching vibration peaks here and at the pump station. They wouldn't allow him inside. Mr. Loch's arm also got red just working under the house at the water pipes.

Other people ran tests here including PPL. All tests were done during the daytime when only one pump is running. At night it is like torture.

I've paid an electrician, heating company, electrical engineer, structural engineer, construction company, Air Care, environmental analyzer and had the EPA from Philadelphia here; a blasting inspector from the DEP, called OSHA, representative Mann and Senator Dent, a lawyer in town and now, a lawyer located in Philadelphia.

I am financially drained and still my house is being ruined. I can't even sell it, as this process continues. I don't believe it is safe to live in my own home. I am a retired teacher, I live alone and because this is a problem for only one person, nobody will do anything to help.

Enclosed are some documents I have gathered and a few letters I wrote to the Pidcock Company (the company who installed the pump station) and the PPL.

Paul Reimer, a structural engineer, really knows the pumps are the problem. He was here twice. After the second visit, he was going to call Steve Henning of the Pidcock Company. He did, but then I

October 2, 2004

waited three months to get his report. Then I found out he used to work for the Pidcock Company! Thus, the nightmare continues. It is so awful to feel these vibrations night and day!

No retiree is thrilled to have someone destroy their home. I feel \$170,000 has been pulled out from under me. It was supposed to be my security for the future. It is a 2,000 sq. ft. house.

Any help you can provide would be wonderful. I have thought of getting an apartment and foreclosing on the property. Then I would still have "zero" for my home! This is just not right!

I spoke to someone on Tuesday, September 28, 2004 from this office. I told him I am leaving for five days from October 17-21. Even if there is someone who could investigate while I am gone, I could give someone from your office the house key.

It has been clear to me when I have workers here, they turn the pumps way down, and it appears there is no problem. As soon as a car or truck leaves, they crank it back up. Someone needs to be in here at 1:00 AM to feel the full intensity. I have reason to believe the pumps are controlled from inside the Veterans' Clinic.

Al Loch, electrical engineer, has taken pictures of the pumps, cracks in the walls in my home, and he said the pump station was not done very professionally, most likely to get the job done inexpensively.

I am waiting for the lawyer to do some research, and a report from the DEP blasting inspector. The township blamed damages on blasting for new homes being built. So, it needed to be eliminated as the source of the problem. And so, this is quite a saga, with which I need some help very badly.

Sincerely,

*Linda L. David*

Linda L. David

LINDA L. DAVID

2922 WEST FAIRVIEW STREET  
ALLENTOWN, PA 18103

610 - 740 - 0637

April 8, 2004

Morning Call  
6th Street  
Allentown, PA 18102

ATT: Letter to the Editor

Re: Customer Service

Recently, ever since January 2004, vibrations and electrical impulses coming into my house have made living in my home a nightmare. In an effort to have someone take care of the problem, I've called many people trying to find the source and get help.

Here are a few comments from customer service workers and elected public officials:

- PPL—"You'll have to investigate this on your own."
- South Whitehall Township Office—When asked if someone could come to evaluate the problem the official said "Too busy."
- State Health Department of Lehigh County—"Call your local authority." This public servant actually hung up the phone before I was finished speaking with her.

The new water pumps (3) placed behind the Veterans' Clinic on Hamilton Boulevard are the culprits. To me, someone forgot to do their homework as far as assessing the structure of nearby homes and taking important steps to sound isolate the pumps and install an insulation pad.

Two reading sources regarding the issues affecting me are:

The Electrical Sensitivity Handbook;  
How Electromagnetic Fields Are Making People Sick  
by Lucinda Grant, 1995

Cross Currents, The Perils of Electropollution, The Promise of Electromedicine  
by Robert Becker, M.D., 1990

Thanks to the CEO of the Veterans' Clinic who was willing to call the property manager. Thanks to the Allentown Water Department. When called, they came within ten minutes to check for leaks.

Customer service for some public works is just what they do; for others, it's pass the buck and blame someone else. Most disgusting!

*Linda L. David*

Linda David  
Allentown

## COMPLAINT INVESTIGATION DESCRIPTION

October 13, 2004

### *Findings for (Step 1):*

All records for these blasts were complete, however it was discovered that Ed Wean Drilling & Blasting exceeded their maximum amount of explosives per delay period and number of holes/decks per delay period as stated in their approved blasting activity permit.

The recorded ground vibrations satisfy the Variable Particle Velocity vs. Frequency Limits recommended by the U.S.B.M. Report RI-8507 (Nov., 1980).

The recorded air-borne effects satisfy the recommended levels set forth in the U.S.B.M. Report RI-8485 (Nov., 1980).

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### (Step 2) Evaluation of Damage:

*X* Damage viewed at home with the complainant. Damage viewed was the following:

- Living room has horizontal cracks off the upper right hand corner of front window.
- Living room west wall has horizontal crack @ the wall/ceiling seam. (plaster on lathe)
- Vertical crack across living room/hallway entry ceiling. Crack is parallel to a repaired crack.
- Vertical crack in east wall at doorway into TV room from the living room. Also a repaired area beginning to buckle.
- Small hairline crack in TV room ceiling & a buckle near the center of the ceiling.
- Laundry room has a crack @ wall/ceiling seam, holes @ outside corner & inside corner at the wall/ceiling points. Walls also have nail pops beginning to show.
- Radon Evac system is operating more often.
- Nail pops in kitchen & hallway ceilings.
- Hallway ceiling has multiple cracks near the bedroom doors.
- Spare bedroom has a vertical crack above the window.
- 3<sup>rd</sup> bedroom has vertical & horizontal cracks @ the entry & closet doors. Crack @ ceiling/wall seam above the closet door and cracks inside the closet in the ceiling & walls.
- Multiple cracks in master bathroom ceiling.
- Master bedroom has a crack @ entry in ceiling and molding beginning to pull away from the ceiling. Also cracks @ upper right corner of closet corner & bathroom door. Cracks & Nail pops are also in the ceiling.
- Tile in corner of the master bedroom bathroom is cracked.
- Cracks in master bedroom closet @ the window and the upper corners of the door.

Complainant's records indicate that the vibrations that she is feeling are in the early morning. No blasting was conducted at the dates and times the complainant has recorded.

# STEVENS & LEE

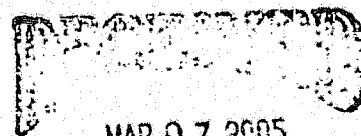
## LAWYERS & CONSULTANTS

190 Brodhead Road  
Suite 200  
P. O. Box 20830  
Lehigh Valley, PA 18002-0830  
(610) 691-7111 Fax (610) 691-7175  
www.stevenslee.com

Direct Dial: (610) 997-5060  
Email: bcm@stevenslee.com  
Direct Fax: (610) 371-8411

March 4, 2005

Ms. Sarah Furedi  
Consumer Protection Agent  
Bureau of Consumer Protection  
Allentown Regional Office  
801 Hamilton Street  
4th Floor  
Allentown, PA 18101



Office of Attorney General

05-0345

Re: Your Inquiry - Linda G. David  
Our Client - South Whitehall Township

Dear Ms. Furedi:

Please be advised that the undersigned represents South Whitehall Township. Your letter of February 22, 2005 has been forwarded to my attention.

So you know, there is no consumer or trade relationship between Ms. David and South Whitehall Township. Moreover, the operator of the Water Pump Station about which Ms. David complains is South Whitehall Township Authority, which also has no trade or consumer relationship with Ms. David, as she is not a customer of the Authority. Accordingly, it is my belief that the Bureau of Consumer Protection does not have jurisdiction over this matter.

Apart from the jurisdictional issue, you should know that the Authority carefully evaluated Ms. David's concerns, and although there is a great deal of empathy by the Board for what she says she is experiencing, there has been absolutely no credible basis for believing that the Authority's Pump Station has anything to do with her alleged problem.

Philadelphia • Reading • Valley Forge • Lehigh Valley • Harnsburg • Lancaster  
Scranton • Wilkes-Barre • Princeton • Cherry Hill • New York • Wilmington

A PROFESSIONAL CORPORATION

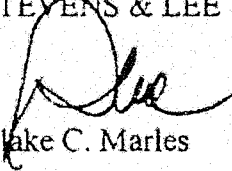
STEVENS & LEE  
LAWYERS & CONSULTANTS

Ms. Sarah Furedi  
March 4, 2005  
Page 2

If you have further concerns or questions, please direct them through this office.

Very truly yours,

STEVENS & LEE

  
Blake C. Marles

BCM:cjd  
cc: South Whitehall Township Board of Authority  
Mr. Gerald J. Gasda

# **Environmental Assessment**

From a  
**Bau-Biologie  
Perspective**

At  
2922 W. Fairview St.  
Allentown PA 18103-2818

Performed for:  
Ms. Linda David

Work performed on premises  
28 March 2004

By  
Sal La Duca  
BS, BB/BBEI, CIE

**Environmental Assay Inc.**  
792 Green St.  
Phillipsburg NJ 08865

[www.emfrelief.com](http://www.emfrelief.com)

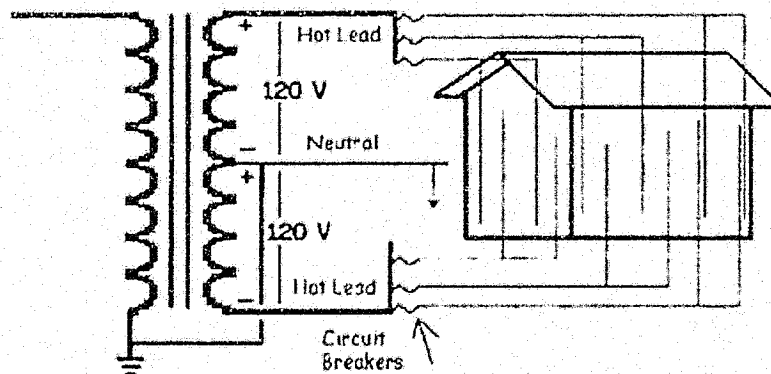
## Executive Summary

Ms. David has noted cracks on her sheetrock walls, dust emissions from her Heating Ventilation and Air Conditioning (HVAC) unit, and has been having difficulty sleeping because of perceptions she feels are associated with a water pumping station only a few hundred feet away. She requested a visit from the author.

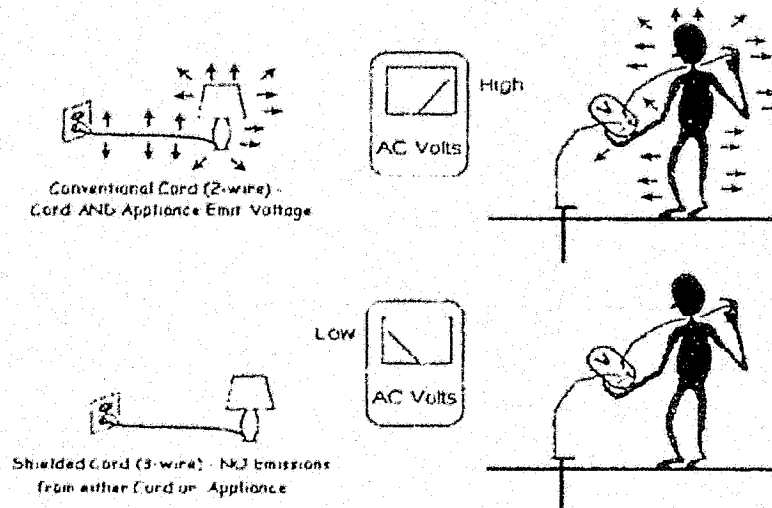
## Findings

The home Ms. David lives in is conventionally built. A conventional design, however, allows for various conditions to exist that can irritate sensitive individuals.

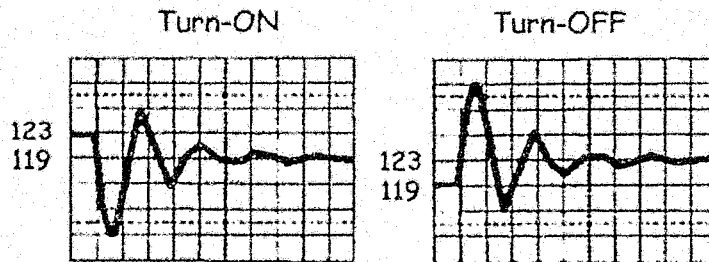
1) The home's electrical system is comprised of Romex wiring throughout. This type of wire allows its Voltage to permeate beyond the insulation and through wall, floor, and ceiling boundaries to establish an electrified birdcage effect.



2) Light and appliance fixtures are wired with conventional cordage, further strengthening the Voltage environment.



3) The Electric Heat Source ( a Heat Coil within the HVAC unit) produced **Voltage Pulsations** that are propagated by the voltage environment. During turn ON and OFF instances especially, the supply voltage, and the resultant emitted voltage that can be measured throughout the structure, takes a step jump down or up, with associated ringing. This can be compared to use of a Transcutaneous Electrical Nerve Stimulator (TENS) instrument, although over the entire surface of the body. The transients are shown simplified below.



4) There was a customary tie between the Electric Ground/Neutral and the Metallic Water Pipe that allowed currents to flow, creating a Magnetic field along portions of the side (adjacent to the Electrical Distribution Panel) and the front of the house. The field varied from 0.2 to 1.4 Amps during observation.

5) There was a background Magnetic Field produced from the Electrical Primary (located on a hill behind the house), identified by a whole-house directional field of 1.5 mG (milliGauss), which also feeds the water pumps located down the street. This field pulsates in similar fashion to the voltage pulsations from the HVAC heater. ★

6) The HVAC unit is located in the crawlspace. It is equipped with many supply and returns. There was no main filter installed in the suction of the machine.

7) The HVAC humidifier tank was totally dry, indicating a previous failure.

8) The home is equipped with wall-to-wall carpeting throughout.

9) Ms. David has a cat, and her vacuum cleaner is not High Efficiency Particulate Air (HEPA) equipped.

## Discussion and Recommendations

1, 2, & 3) The wiring installed throughout is Romex. This type of wire allows voltage to permeate beyond the plastic insulating jacket. **Because the Voltage is Alternating (that is, changing with time), it will induce voltages on conductive objects or creatures within its region of influence (or Field extent), causing a portion to be echoed back by the body the influence is on.** ★

suction header. The Main Filter should be Pleated Media to ensure good dirt stopping ability.

7) The HVAC Humidifier was totally dry and appeared to have been so for some time. Proper operation might have reduced the ability of dust deposits from becoming liberated, but it would have simply delayed the evident emergence of the associated problems. It should be repaired and checked annually. A Structural Engineer investigated the cracks on the sheetrock walls and determined that construction defects during construction might have been a cause for this. Repairs were suggested and implemented. However, this author suspects that the cracks on the sheetrock walls may have been exacerbated by the extreme dryout during winter due to Humidifier non-functioning.

*was repaired.*

8) Humans shed skin cells regularly. Animals shed dander regularly. This can provide for a buildup of organic debris within the carpeting as installed. While Cat Dander is itself a strong allergen, an enhanced organic debris base can provide for a significant buildup of Dust Mites and their debris. This debris is a potent allergen that can provide symptoms of respiratory irritation or asthmatic character. A HEPA equipped vacuum will remove dirt down to 0.3 microns which includes all pollen, all mold spores, dust mite debris, many bacteria, and other particles within the same size ranges. A conventional vacuum cleaner will trap dust that is 5-10 microns or greater in size, give the appearance of cleanliness, but spread the finer dust around evenly. One telltale sign is a peculiar smell of "old dust" when using a conventional vacuum cleaner. That is because the user is inhaling a portion of the finer dust that is made airborne. It is recommended that a HEPA vacuum cleaner be purchased and a "spring cleaning" be done throughout. This will also trap much of the dust already liberated by the HVAC unit.

9) The access hatch for the crawlspace should be equipped with handles for easy removal, the carpet above should be cut to the dimensions of the hatch, and the crawlspace equipped with substantial lighting to ease the task of regular maintenance, that should be considered a must for proper health care.

## Resources:

**THE ELECTRICAL SENSITIVITY HANDBOOK: How Electromagnetic Fields (EMFs) Are Making People Sick** - Lucinda Grant - Weldon Publishing, P.O. Box 4146, Prescott AZ 86302 - 1995, ISBN 0-9635407-2-6

**ENERGY MEDICINE: The Scientific Basis** - James L. Oschman, Candace Pert - Publisher: Churchill Livingstone, Inc., - 2000, ISBN: 0-443-06261-7.

**CROSS CURRENTS, The Perils of Electropollution, The Promise of Electromedicine** - Robert O. Becker M.D., - Publisher: James P. Tarcher Inc. 1990, ISBN 0-87477-609-0.

8/3/05

Dear Mrs. Barbush,

I am very grateful for your kind attention to this matter. It is an "Eric Brokovitch" story, to be sure.

The letter to Sen. Santorum is a good summary. He just contacted the DEP, which I had already done.

These are only some of the documents I have, but the most crucial ones.

The testing done by Al Loch, electrical engineer, is most comprehensive. It was sent to PPL, the township, newspaper, TV station, and nobody says or does anything! The township says their engineers checked everything. Well, not here! Al Loch was the only one to spend a whole day down under the house, as the pictures show.

When one pump is running, vibrations are minimal, but at night (2:00 A.M. to 5:00 A.M.) when 3 are running, vibrations and electrical

intensity is terrible. And yet, Al Lock tested during the daytime hours, so it is reasonable to assume it is worse at night.

Thanks for your much needed help!

Sincerely,  
Linda L David

610-740-0637

P.S. - I happen to be a cancer survivor, surgery and 6 months of chemo, was easier than what I've endured <sup>here</sup> for the last 15 months. All of the stress isn't good for me or anyone!

I would request to have the materials returned after your review, I suspect I'll need them. Thanks much!

I have photos of the pumps. Al  
Loch was given permission to go in  
when pumps were shut off. The  
first lawyer didn't return them,  
and this second lawyer smeared  
and ruined the photos. I asked  
Al to send me replacements.  
They will be forthcoming to you as  
soon as I get them.

They may have added  
sound isolators because  
noise is lessened, but I  
do not think insulation pads  
have been installed. I do not  
know, for sure.

THINGS  
I'LL DO

**TO JAI**

DATE

7/7/05

COMPLETED

1 \_\_\_\_\_

2 *These are the pumps*   
*(South Whitehall's)*

3 \_\_\_\_\_

4 *no isolators nor*

5 *insulation pads*

6 *under pumps*

7 \_\_\_\_\_

8 *They may have*

9 *added isolators by this*

10 *time - noise is less*

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3205 New St. Bethlehem, PA 18015 • (215) 867-2111  
370 Larry Holmes Dr. Easton, PA 18042 • (215) 252-2111

CASE # - 195298 Pennsylvania PUC  
Aug, 11, 2005  
AUG 15 2005

Consumer Services  
CAC Division

Ms. Barbrach

These are the photos  
of the South Whitehall Township  
pumps behind the Veterans'  
Clinic on Hamilton Blvd.

This is how they were  
returned to me from  
the 2<sup>nd</sup> lawyer who  
wouldn't take the case.

I believe they were ruined  
on purpose. I was told he  
got caught in a rainstorm.  
I doubt it. It hasn't  
rained for days.

I called Al Loch, electrical  
engineer. He took the pictures  
→

after Mr. Uff from the  
township gave him permission  
to go into the pump  
station. He may be able  
to print out more from a  
digital disc. I called his  
wife, but I didn't get  
any photos, yet. So I  
thought you should see  
these. You can still see  
there were no sound  
isolators nor incubation  
pads under the pumps.  
Why they tried to copy these  
is unanswered!

Sincerely,  
Linda L. David

Case # 17-2987

Aug. 23, 2005

Pennsylvania PUC

AUG 25 2005

Consumer Services  
CSC Division

Ms. Barbush,

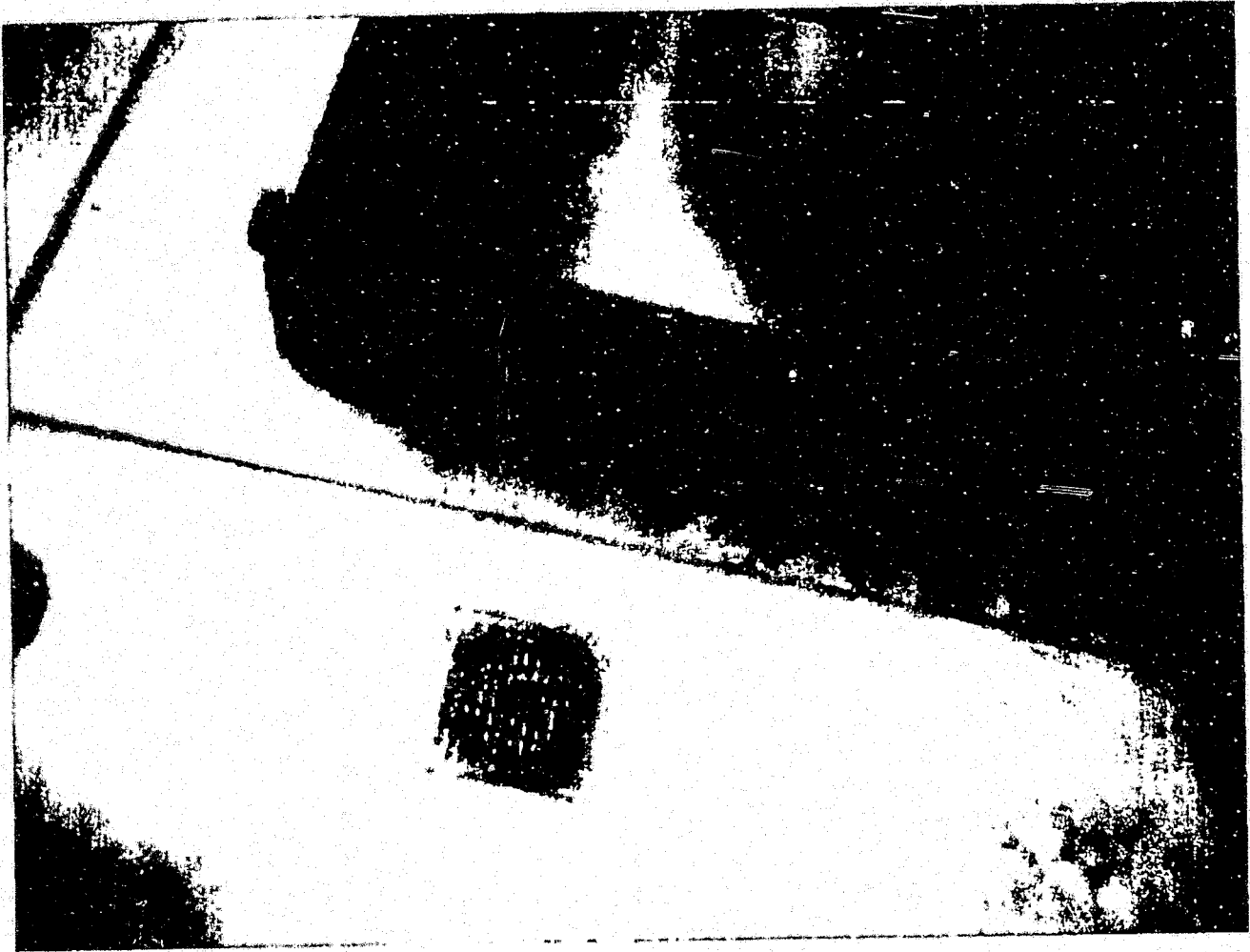
These are the pictures of the water pumps 200' from my house - no isolators and no insulation pads in place. These were damaged by the last lawyer, as I had previously sent you those altered pictures. His office happened to be in South Whitehall. I should have known better concerning a conflict of interest, but there are very few lawyers dealing with environmental issues in the area.

As ever,

Linda L. David

2922 W. Fairview St,  
Allentown, PA

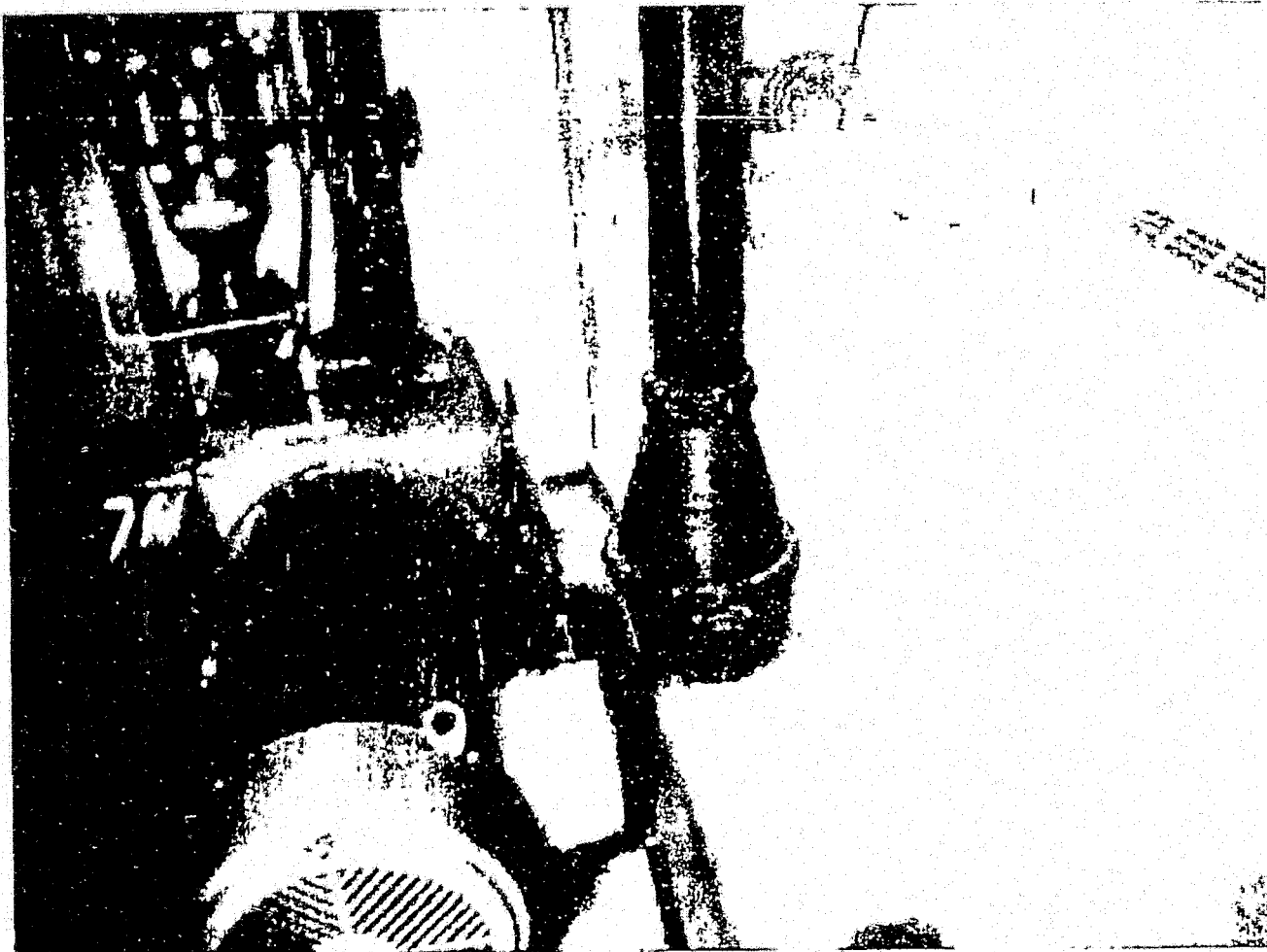
18103



**OVER SIZED DOCUMENTS**



**OVER SIZED DOCUMENTS**

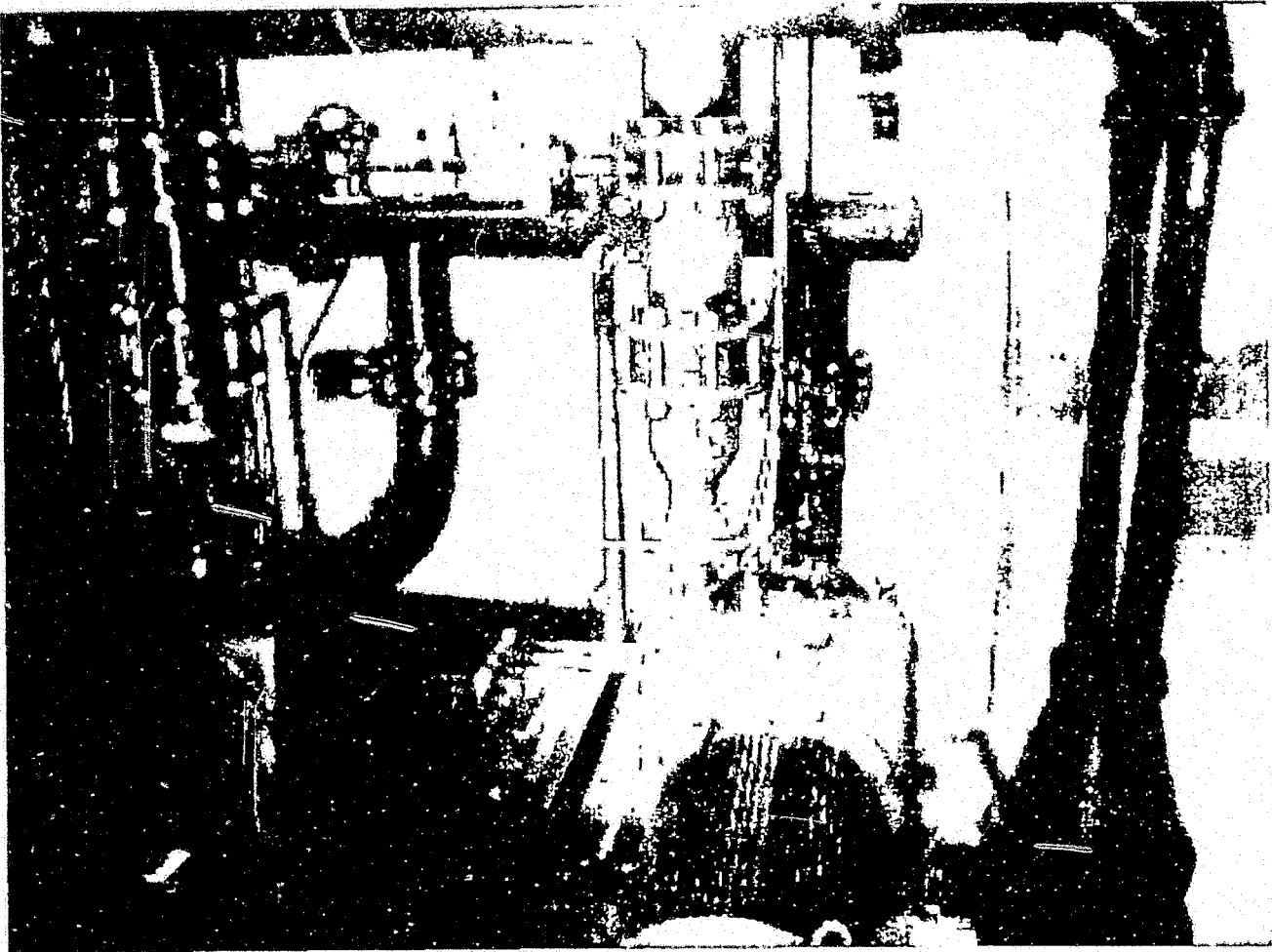


**OVER SIZED DOCUMENTS**

Pennsylvania

AUG 25 1977

Consumer  
CAC DE

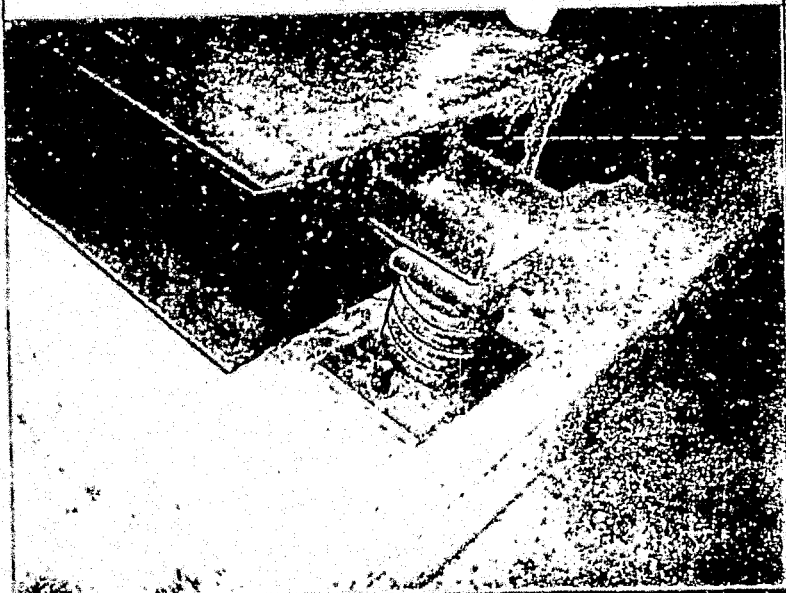


**OVER SIZED DOCUMENTS**

Pennsylvania PUC

AUG 25 2005

Consumer Services  
CAC Division



**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

Pennsylvania PUC

AUG 25 2005

Consumer Services  
CAC Division

**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID

2922 WEST FAIRVIEW, ALLENTOWN, PA

Problem #: 2

DATE: February 18, 2004

MVC #: 131

IR #:

LOCATION

Linda David's Home at 2922 West Fairview, Allentown,  
PA

**EQUIPMENT**

Possible 600 GPM Pumps-Not Sound Isolated Like  
Pictured Pump

**PROBLEM**

Note, vibration isolated foundation for pumps.

**COMMENTS / RECOMMENDATION**

Check South Whitehall Twp. Pumps for vibration, isolation.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_

ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_

ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_

ACTION TAKEN:



**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

Pennsylvania PUC

AUG 25 2005

Consumer Services  
CAC Di...

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID**  
2922 WEST FAIRVIEW, ALLENTOWN, PA  
Problem #: 1                      DATE: February 18, 2004

MVC #: 129                      IR #:  
LOCATION  
Linda David's Home at 2922 West Fairview, Allentown,  
PA

EQUIPMENT  
Possible 600 GPM Pumps-Not Sound Isolated Like  
Pictured Pump

PROBLEM  
Note, rubber vibration isolation joints.

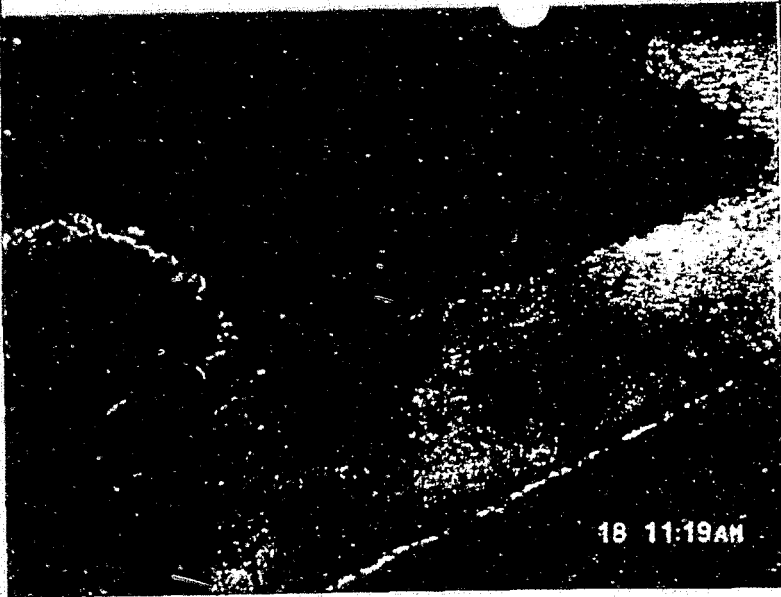
COMMENTS / RECOMMENDATION  
Check South Whitehall Twp. Pumps for vibration, isolation.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:



18 11:19AM

NO THERMOGRAM NECESSARY

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

Pennsylvania PUC

AUG 25 2005

Consumer Services  
CAC Division

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For

LINDA DAVID

2922 WEST FAIRVIEW, ALLENTOWN, PA

Problem #: 3

DATE: February 18, 2004

MVC #: 133

IR #: N/A

**LOCATION**

Linda David's Home at 2922 West Fairview, Allentown,  
PA

**EQUIPMENT**

Possible 690 GPM Pumps-Not Sound Isolated Like  
Pictured Pump

**PROBLEM**

Note, rubber isomer pads under mounts.

**COMMENTS / RECOMMENDATION**

Check South Whitehall Twp. Pumps for vibration, isolation.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_

ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_

ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_

ACTION TAKEN:



Date 10/29/2003  
1200

MS. [unclear]  
1922 W. [unclear] ST.  
ALLENTOWN, PA. 18103

**Work to be completed as follows:**

- ADD
- INSTALL 2 X 4 CONTINUOUS BRACE WALLS ON BOTH SIDES OF ROOF AREA
- WALLS TO BE BRACED TO PLATE BETWEEN EXTERIOR WALL AND RIDGE BEAM
- TO RESIST WIND LOADS OF 140 PSF
- COLLAR TRUSS ARE TO BE INSTALLED (2 X 6) ON MAIN RAFTERS TO INCREASE
- POSSIBILITY OF WATER SPRINGING AND UNDERLOAD
- EXISTING HIP & VALLEY JOINTS ARE TO BE ADEQUATELY SUPPORTED TO FLOOR
- JOISTS.
- CRAWL SPACE
- EXISTING VERTICAL SUPPORTS BELOW BEAM WHICH ARE NOT CURRENTLY
- SUPPORTING BEAM ARE TO HAVE BRACINGS INSTALLED TO ADD SUPPORT
- TO BEAM AREAS
- BEAM AREAS WHERE POCKETED INTO FOUNDATION WALL IS TO BE SUPPORTED
- TO EXISTING FOOTERS
- ALL WOOD DEBRIS IN CRAWL SPACE AREA IS TO BE REMOVED AND DISPOSED OF

CUSTOMERS PHONE # 610-740-0637

IF THIS PROPOSAL IS ACCEPTABLE PLEASE SIGN ONE COPY & EITHER FAX TO 610-799-5912 OR YOU CAN MAIL A SIGNED COPY IN THE ENVELOPE PROVIDED. ANY QUESTIONS PLEASE CALL OUR OFFICE AT 610-433-8670. THANK YOU!

*All the above work was completed  
on 1/19/04 -  
Mary Fourn*

GRADE A REMODELING

All Materials are guaranteed to be as specified & the above work to be completed in a substantial workman-like manner. Any deviations from above specified work will be executed only by Addendum to original estimate. All agreements contingent upon accidents or delays beyond our control. This estimate may be withdrawn by us if not accepted within 90 days.

Total \$2,950.00	Terms 1/2 Start 1/2 Completion
------------------	--------------------------------

Signature & Date \_\_\_\_\_

THINGS I'LL DO **TODAY**

DATE: 7/7/02

COMPLETED

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. No carpet
5. insulation
6. under floor
7. \_\_\_\_\_
8. They may have
9. added insulation by this
10. time - noise less

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# THE TODAY

DATE

COMPLETED

3

4

5

6

7

8

9

10

Office Supply

215-435-1000 (215) 435-1000  
215-435-1001 (215) 435-1001  
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215-435-1005 (215) 435-1005

Grade A Remodeling

1129 Allen St.  
Allentown, PA

# Statement

Date
12/22/04

To:

MS. LINDA DAVID  
2922 WEST FAIRVIEW ST.  
ALLENTOWN, PA. 18103

Date	Transaction	Amount Due	Amount Enc.		
		Amount	Balance		
11/18/2003	Balance forward		1,450.00		
01/19/2004	Added work customer requested	50.00	1,500.00		
01/19/2004	PMT #108	-1,500.00	0.00		
<p><i>Some of cracks the were taped + plastered</i></p> <p><i>PD in full for estimate # 1200 -</i></p> <p><i>2950.00 total</i></p> <p><i>50.00 - added work,</i></p> <p><i>Mary Foreman</i></p> <p>GRADE A REMODELING</p>					
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	Amount Due
0.00	0.00	0.00	0.00	0.00	50.00



Submitted To:  
MR. RICHIE DAVIS  
2922 W. FAIRVIEW ST.  
ALLEN TOWNSHIP, PA. 18109

Work to be completed as follows:

- ATDC
- INSTALL 2 X 4 CONTINUOUS EDGE WALLS ON BOTH SIDES OF ROOF AREA
- WALLS TO BE NAILER AND SPAN BETWEEN EXTERIOR WALL AND RIDGE BEAM TO DISTRIBUTE LOAD ON RAFTERS
- COLLAR TIES ARE TO BE INSTALLED (2 X 6) ON MAIN RAFTERS TO DECREASE POSSIBILITY OF RAFTER SPREADING AND UNDERLOAD
- EXISTING HIP & VALLEY JOINTS ARE TO BE ADEQUATELY SUPPORTED TO FLOOR
- STAIR
- VERTICAL SUPPORTS BELOW BEAM WHICH ARE NOT CURRENTLY SUPPORTED BY WALL ARE TO HAVE BLOCKING INSTALLED TO ADD SUPPORT
- EXISTING BRICK EXTERIOR WALL IS TO BE SUPPORTED
- EXISTING CEMENT WALKWAY AREA IS TO BE REMOVED AND DISPOSED OF

PLEASE RETURN THIS COPY & OTHER FAX TO THE ENVELOPE PROVIDED. THANK YOU!

All the above work was completed  
on 1/19/04 -  
Mary Fournier

GRADE A REMODELING

Amount of specified work will be...  
Be...  
...

Total \$ 0.00

Autism



### Allentown council rezones for ballpark

PAGE B3

INDEX

Business	B10-15
In Person	B8
Obituaries	B16, 17
Police	B3
Weather	B28

# LOOKAL

THURSDAY, OCTOBER 20, 2005

THE MORNING CALL

SECTION B

5

*If South  
put pumps in without  
proper insulation, etc.  
do the job and  
correctly and  
professionally!*

# Authorities unite against water giant

## They aim to stop Aqua Pennsylvania from buying local company.

By Veronica Torrejon  
Of The Morning Call

The Lehigh County Authority named South Whitehall Township's water authority Wednesday in trying to block

water giant Aqua Pennsylvania from gaining a foothold in the county by buying a small water company.

Aqua Pennsylvania filed an application with the state Public Utility Commission to purchase County Club Gardens Water Co. for \$100,000. The company provides water to 415 hens in Salisbury, South Whitehall and Lower Merion townships.

The sale would be the first successful attempt by Aqua Pennsylvania to buy a water system in Lehigh County.

Emmanus previously had decided not to privatize its system. Responding to the public notice of the sale on Oct. 7, the LCA voted to join South Whitehall's authority in filing a protest with the PUO before the Oct. 24 deadline. "The authority has decided

to protest the petition... because it would be in the best interest of the communities to be served by the existing authorities..." said Aurel Arndt, general manager of the Lehigh County Authority.

PUO approval is the first step to the acquisition by Aqua Pennsylvania, a subsidiary of the nation's largest publicly traded water company, Aqua America Inc. Head-

quartered in Bryn Mawr, Aqua America serves about 13 million customers in Pennsylvania, spokeswoman Donna Alston said.

While the LCA never negotiated to buy County Club Gardens Water, Arndt said the authority had expressed interest in the company's holdings over the years.

WATER PAGE B2

End of Page

## WATER FROM PAGE B1

# Company aims to buy system for \$100,000

The LCA would be able to provide lower rates to customers, he said.

"They are a stockholder owned company and they generate profits," Arndt said of Aqua Pennsylvania. "As a public entity, we are able to obtain tax exemption. All of the revenues that we generate from our system go into the operation maintenance."

The application asks that rates remain the same for Country Club Gardens customers, who pay about \$233 a year for 60,000 gallons used. Aqua Pennsylvania calculates rates based on a statewide model, Alston said. The statewide rate for 60,000 gallons is about \$480 a year. So, while customers would not see an immediate increase, rates eventually would rise.

The advantage to the takeover would be the company's ability to invest in system improvements, said Keith Gabage, director of corporate development. Those improvements ensure water quality meets increasingly stringent federal standards.

Gabage said rates often are kept low by municipalities that make investments to water systems using revenue from other sources.

"You can't keep your rates stagnant forever," he said. "You have to make rate increases. If you don't, those rates are artificially low."

And unlike municipal systems, Gabage said, Aqua America has engineers and environmentalists on staff to provide professional oversight.

What they lack is local presence, South Whitehall Manager Gerry Gasda said. "I understand they are a good

company," he said. "But we have a water crew here on hand. We have a work force that is ready and waiting and based locally."

Local water authorities also have multiple wells to rely on in the event of contamination, Gasda said. "The bottom line is, if something were to happen like that in a private system, they don't have other sources of water to go to."

South Whitehall Township's water authority negotiated with Ralph Uff in 2002 to purchase a portion of the water rights to Country Club Gardens and the community of Springhouse Farms, which are in the township, Gasda said. They failed to reach an agreement on price, he said.

Catherine Uff, who heads Country Club Gardens Water Co., along with her husband Ralph, 72, disagreed.

The authority, she said, never approached them about purchasing their entire holdings. Uff said the last communication she and her husband had with South Whitehall Township was a letter stating the township lacked the funds to purchase a portion of their company.

For decades, the Uffs almost single-handedly have run the operation, answering phones, repairing water lines, reading water meters and billing customers. Although Country Club Gardens Water is a corporation, the Uffs are the two working members. Now, the couple say, they are ready to retire.

"It's very hard. It's taken a year of thinking about it," said Catherine Uff, 69. "But it's a 365-day-a-year job and 24 hours a day. We can never go anywhere without beepers and radios."

Uff said she felt safe leaving her customers in the hands of Aqua Pennsylvania.

Furthermore, she said dividing their holdings would not be practical.

"That would be so difficult for us to divide this company into three different parcels and try to negotiate with three different townships. That wouldn't be workable for

anyone," she said.

Paul Marin, who led opposition to privatization in Emmaus, on Tuesday contacted residents of the three communities to warn them of the impending sale.

Marin said he fears that once Aqua Pennsylvania gets a toehold in Lehigh County, it will try to spread its holdings in the area. His sentiments were echoed by Arndt, who said Aqua Pennsylvania and Aqua America have a history of acquiring small systems and then using those as a basis to expand their holdings.

"The reason I am very passionate about this is because I view water like air, as a right to life, not a commodity," Marin said.

Among those Marin contacted were several residents who live in the same community as the Uffs, including David Dunbar.

"Philosophically, I think water should be publicly owned by communities, but we live in the same neighborhood with the owners... and I'm reluctant to start a war here," Dunbar said. "They have served us well and worked hard over the years."

Dunbar, 73, said he would prefer the LCA take ownership of the company, but he also respects his neighbors' decision to sell to the highest bidder.

"They don't have to do this forever. They have a right to retire, and they should get a fair price for their property," he said.

The authorities' protests have yet to be filed with the PUC, spokeswoman Page said.

If the protests are filed, the application will go before an administrative law judge who would hold a hearing and make a recommendation. The commission then would decide to reject or approve the sale.

veronica.torresjon@mcall.com  
610-820-6510

Whether you're looking to



OVER SIZED DOCUMENTS

3/10/05

received

3/28/05 1:52/05

Louisa,

This picture shows how bad my upper cheek & ear is when I wake up electricity & vibrations surge through furniture!

When Redcock finally sends someone it is important that 3 pumps are running full blast like they do @ →

received

3/15/05

Hi Louisa,

This came in the mail yesterday. I believe this agent visited the pump station. Wish she had come here, also!!

If you lean on the bar in the garage you can feel the whole ground move.

It is so bad →

COMMERCIAL BUILDING INFORMATION FOR VA WHITEHALL LLC

PIN 548683607536 PARNUM 1 CARD# 01 ELDG# 02

OCCUPANCY DESIGN EQUIPMENT SHED

ADDITIONS

FLOOR AREA 425  
NO OF STORIES 1  
YEAR BUILT 2000  
HEATING/COOLING  
ELEVATORS NO  
SPRINKLES NO  
BASEMENT AREA 0  
DISTRICT NAME SOUTH WHITEHALL TOWNSHIP

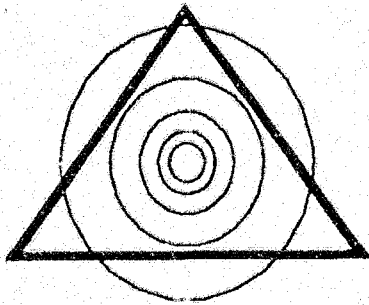
1.  
2.  
3.  
4.  
5.  
6.  
7.  
8.  
9.

PUB7

11-Jul-2005

COUNTY OF LEHIGH  
Office of Assessment

Government Center  
17 South Seventh Street, Room: 517  
Allentown, Pennsylvania 18101-2400  
Phone: 610-782-3038  
Fax: 610-820-3380



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**FAX (610) 876-7178**

**EMAIL-TRNTYEE@BELLATLANTIC.NET [Http://www.TRINITYASSOC](http://www.TRINITYASSOC)**

*FOR*

**LINDA DAVID**

**ALLENTOWN, PA**

Project: Engineering Survey

Date: February 18, 2004

Job #: T-5445

*Alan A. Loch*

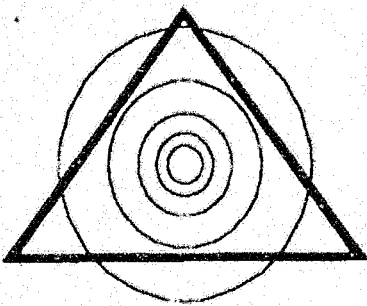
Alan A. Loch  
Project Engineer



TABLE OF CONTENTS  
ENGINEERING SURVEY  
LINDA DAVID RESIDENCE  
FEBRUARY 18, 2004

Special Comments

Linda David Residence, 2922 W. Fairview Allentown, PA 18103	Problem #
Possible 600 gpm Pumps Not Sound Isolated Like Pictured Pump	1
Possible 600 gpm Pumps Not Sound Isolated Like Pictured Pump	2
Possible 600 gpm Pumps Not Sound Isolated Like Pictured Pump	3
Cracks in Ceiling and Walls	4
Additional Cracks in Ceiling and Walls	5
Additional Cracks in Ceiling and Walls	6
Additional Cracks in Ceiling and Walls	7
Additional Cracks in Ceiling and Walls	8



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**LINDA DAVID RESIDENCE  
ENGINEERING SURVEY  
SPECIAL COMMENTS**

Because of damage to the house, investigate whether electrical motor driven pumps from water pumping station are properly vibration isolated from foundation. See pages 1, 2 & 3 of another customers properly vibration isolated pump. See pages 4, 5, 6, 7 & 8.

Note the 15 different cracks in the walls at the house. Three thousand dollars worth of structural work has already been done to the house, but damage could be continuing.

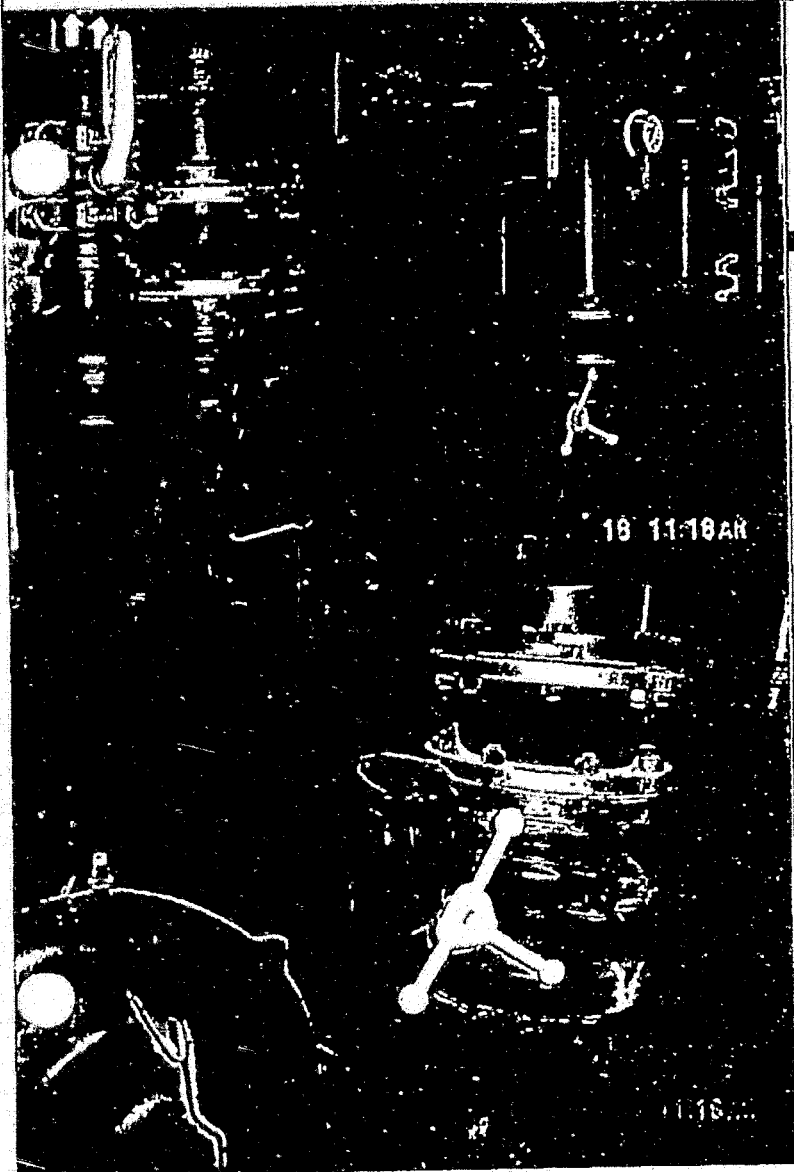
Please call if you have any questions.

Sincerely yours,

A handwritten signature in cursive script that reads "Alan A. Loch".

Alan A. Loch

Electrical Engineer



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

*For*  
**LINDA DAVID**  
2922 WEST FAIRVIEW, ALLENTOWN, PA  
Problem #: 1                      DATE: February 18, 2004

MVC # 129                      IR #  
LOCATION  
Linda David's Home at 2922 West Fairview, Allentown,  
PA

EQUIPMENT  
Possible 600 GPM Pumps-Not Sound Isolated Like  
Pictured Pump

PROBLEM  
Note, rubber vibration isolation joints.

COMMENTS / RECOMMENDATION  
Check South Whitehall Twp. Pumps for vibration, isolation.

**MAINTENANCE HISTORY**

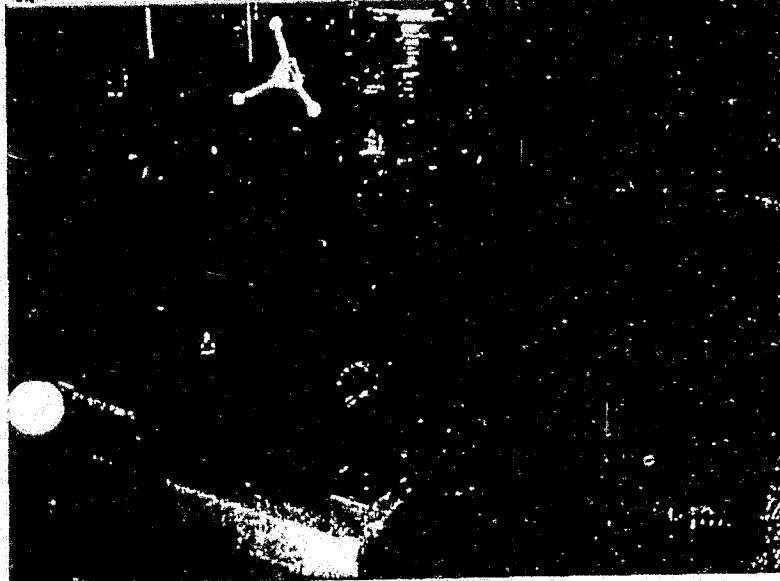
DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN.

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN.

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN.

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

*For*

**LINDA DAVID**

**2922 WEST FAIRVIEW, ALLENTOWN, PA**

**Problem #. 2**

**DATE February 18, 2004**

**MVC # 131**

**IR #:**

**LOCATION**

**Linda David's Home at 2922 West Fairview, Allentown,  
PA**

**EQUIPMENT**

**Possible 690 GPM Pumps-Not Sound Isolated Like  
Pictured Pump**

**PROBLEM**

**Note, vibration isolated foundation for pumps.**

**COMMENTS / RECOMMENDATION**

**Check South Whitehall Twp. Pumps for vibration, isolation**

**MAINTENANCE HISTORY**

**DATE \_\_\_\_\_ INITIALS \_\_\_\_\_**

**ACTION TAKEN**

**DATE \_\_\_\_\_ INITIALS \_\_\_\_\_**

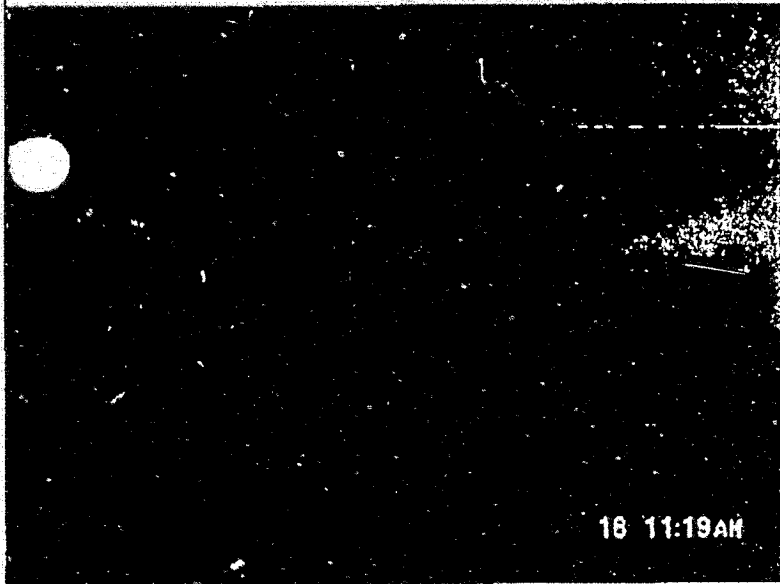
**ACTION TAKEN**

**DATE \_\_\_\_\_ INITIALS \_\_\_\_\_**

**ACTION TAKEN**

**OVER SIZED DOCUMENTS**

**RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR**



18 11:19AM

NO THERMOGRAM NECESSARY

OVER SIZED DOCUMENTS

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY

For  
**LINDA DAVID**  
2922 WEST FAIRVIEW, ALLENTOWN, PA  
Problem #: 3                      DATE: February 18, 2004

MVC # 133                      IR # N/A  
LOCATION  
Linda David's Home at 2922 West Fairview, Allentown,  
PA

EQUIPMENT  
Possible 600 GPM Pumps-Not Sound Isolated Like  
Pictured Pump

PROBLEM  
Note, rubber isomer pads under mounts

COMMENTS / RECOMMENDATION  
Check South Whitehall Twp Pumps for vibration, isolation

MAINTENANCE HISTORY

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID**  
2922 WEST FAIRVIEW, ALLENTOWN, PA  
Problem # 4                      DATE February 18, 2004

MVC # 141, 142 & 143                      IR #: N/A

**LOCATION**

Linda David's Home at 2922 West Fairview, Allentown,  
PA

20 8:20AM

**EQUIPMENT**  
Cracks in Ceiling and Walls

**PROBLEM**

\$3000 of work done already. What is causing cracks?

**COMMENTS / RECOMMENDATION**

Are water pumps vibrating and causing damage?  
Investigate

20 8:21AM

**MAINTENANCE HISTORY**

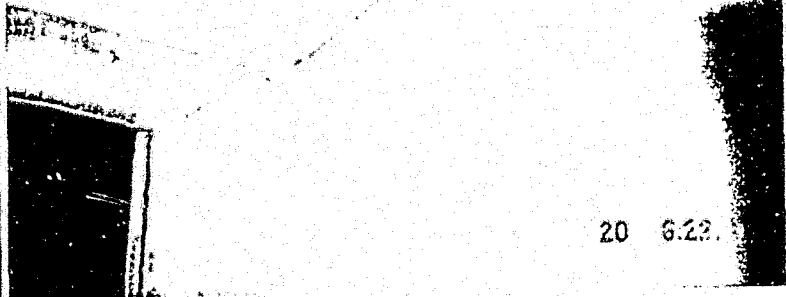
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ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

20 8:21AM

**OVER SIZED DOCUMENTS**



**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY

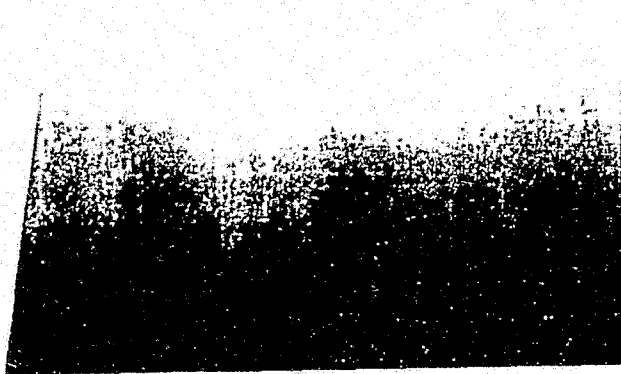
For  
**LINDA DAVID**  
2922 WEST FAIRVIEW, ALLENTOWN, PA  
Problem # 5                      DATE February 18, 2004

MVC # 144, 145 & 146                      IR # N/A

**LOCATION**  
Linda David's Home at 2922 West Fairview, Allentown,  
PA

**EQUIPMENT**  
Cracks in Ceiling and Walls

**PROBLEM**  
\$3000 of work done already. What is causing cracks?



**COMMENTS / RECOMMENDATION**  
Are water pumps vibrating and causing damage?  
Investigate.

**MAINTENANCE HISTORY**

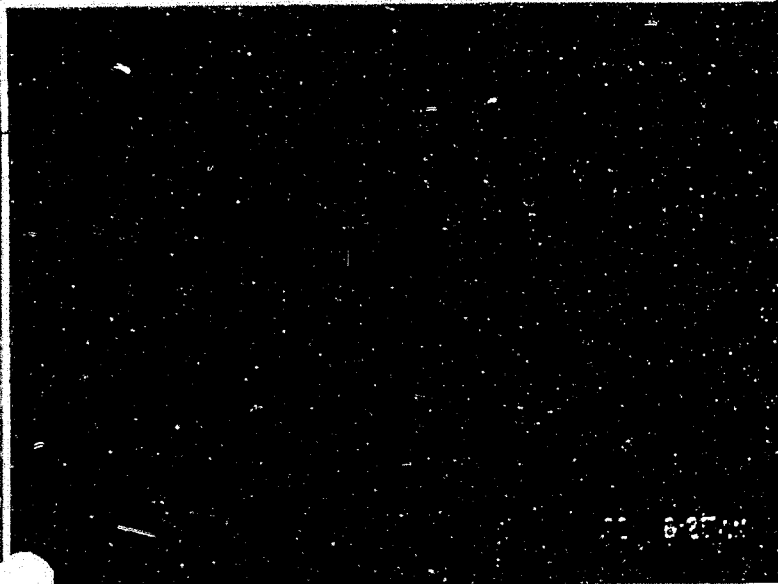
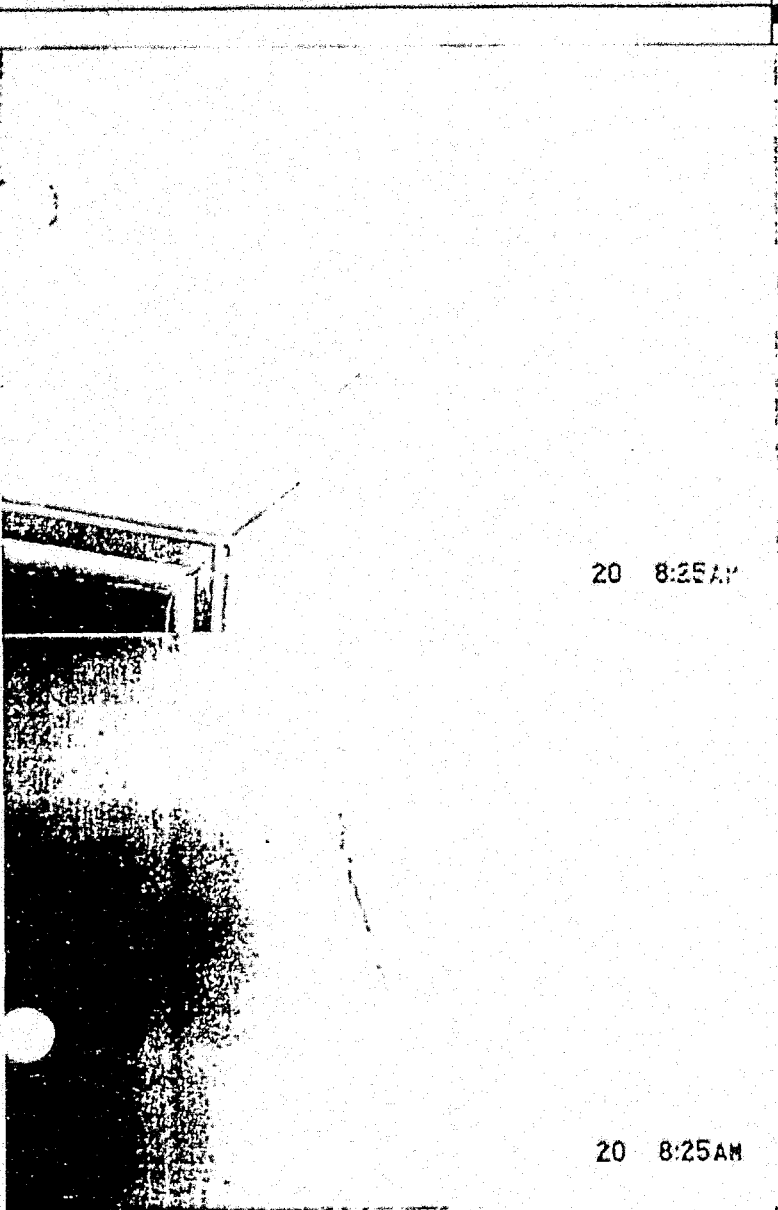
DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:



**OVER SIZED DOCUMENTS**



**INFRARED**  
 PREVENTIVE MAINTENANCE SURVEY  
 For  
 LINDA DAVID  
 2922 WEST FAIRVIEW, ALLENTOWN, PA  
 Problem #: 6                      DATE: February 18, 2004

MVC #: 147, 148 & 149              IR # N/A  
**LOCATION**  
 Linda David's Home at 2922 West Fairview, Allentown,  
 PA

**EQUIPMENT**  
 Cracks in Ceiling and Walls

**PROBLEM**  
 \$3000 of work done already. What is causing cracks?

**COMMENTS / RECOMMENDATION**  
 Are water pumps vibrating and causing damage?  
 Investigate.

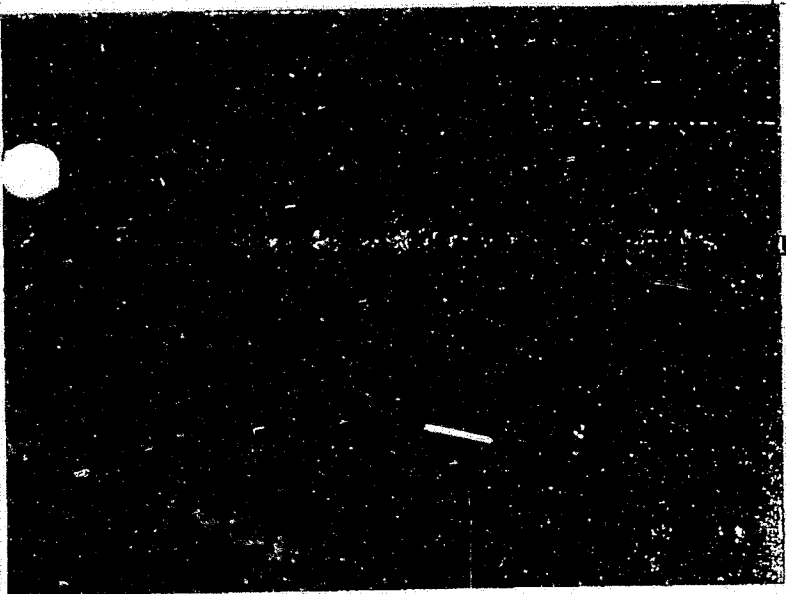
**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
 ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
 ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
 ACTION TAKEN:

**OVER SIZED DOCUMENTS**



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID**  
2922 WEST FAIRVIEW, ALLENTOWN, PA  
Problem #: 7                      DATE: February 18, 2004

MVC # 150, 151 & 152      IR #: N/A  
**LOCATION**  
Linda David's Home at 2922 West Fairview, Allentown,  
PA

**EQUIPMENT**  
Cracks in Ceiling and Walls

**PROBLEM**  
\$3000 of work done already. What is causing cracks?

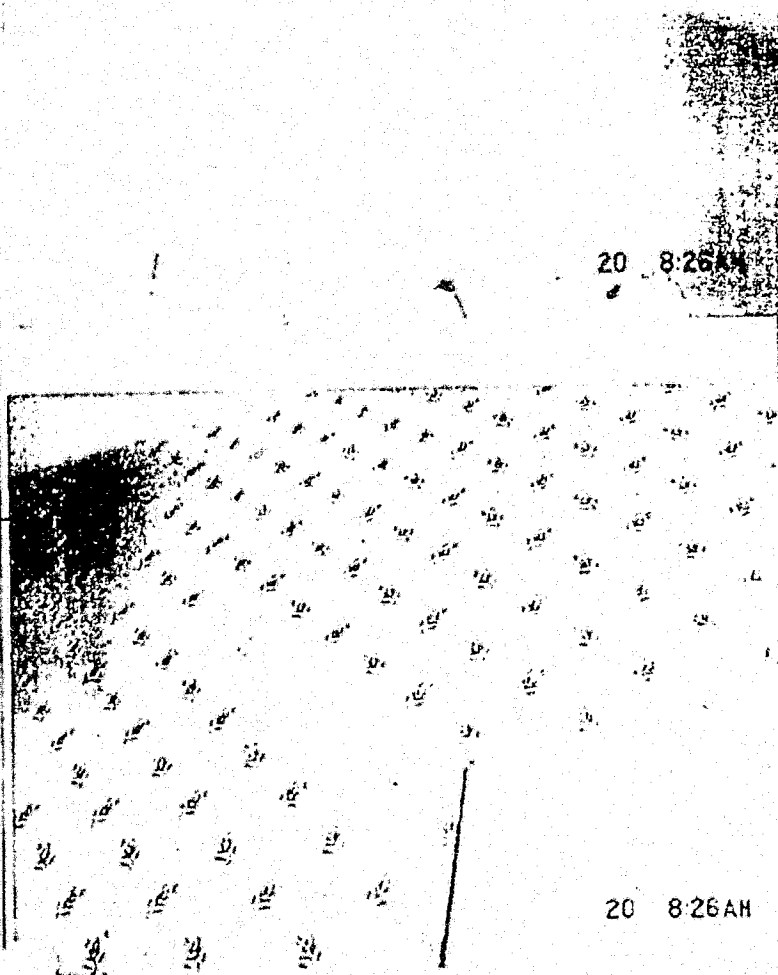
**COMMENTS / RECOMMENDATION**  
Are water pumps vibrating and causing damage?  
Investigate.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN.

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN.

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN.



**OVER SIZED DOCUMENTS**

**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
2922 WEST FAIRVIEW, ALLENTOWN, PA  
Problem # 8                      DATE: February 18, 2004

MVC #: 153, 154 & 155      IR # N/A  
LOCATION  
Linda David's Home at 2922 West Fairview, Allentown,  
PA

EQUIPMENT  
Cracks in Ceiling and Walls

PROBLEM  
\$3000 of work done already. What is causing cracks?

COMMENTS / RECOMMENDATION  
Are water pumps vibrating and causing damage?  
Investigate.

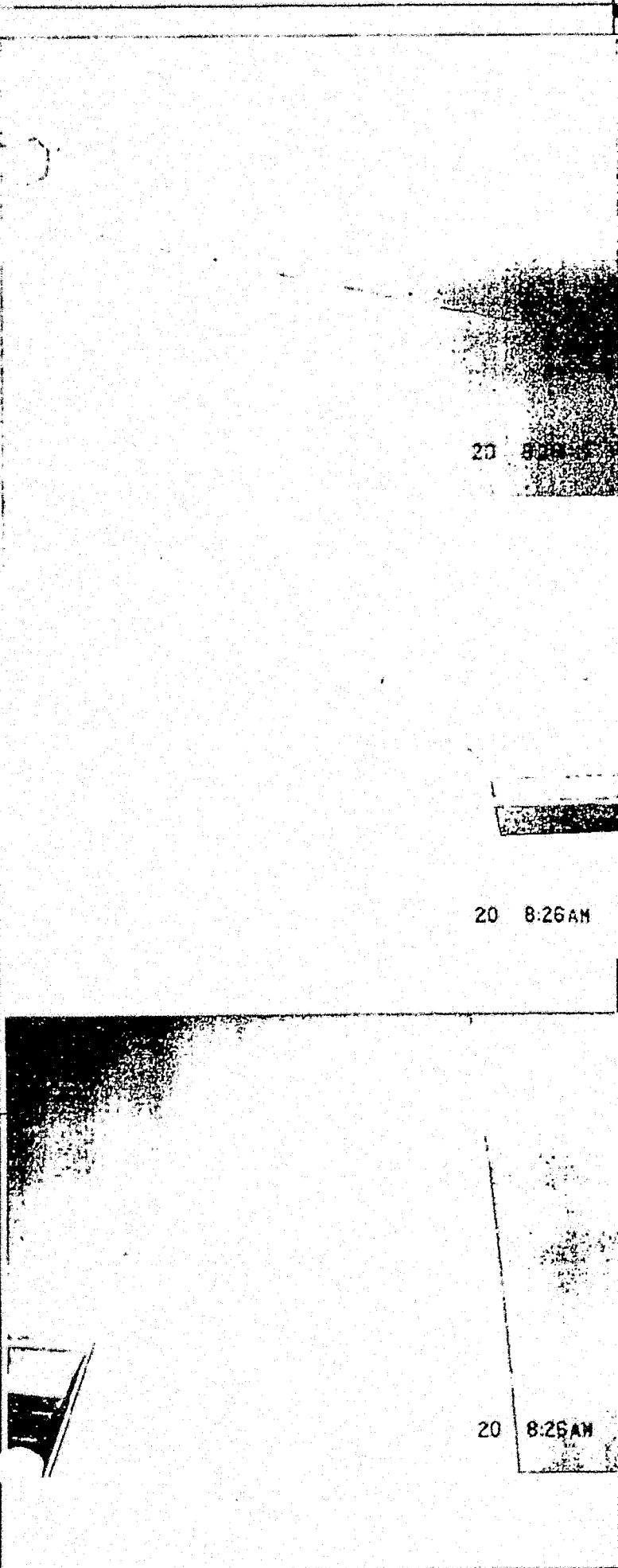
MAINTENANCE HISTORY

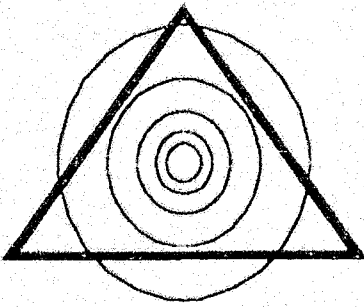
DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

**OVER SIZED DOCUMENTS**





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*FOR*

**LINDA DAVID**

**ALLENTOWN, PA**

Project: Vibration Analysis & Magnetic Field Studies Date: September 13, 17, 23 & 24, 2004  
Job #: T-5492

*Alan A. Loch*  
Alan A. Loch  
Project Engineer

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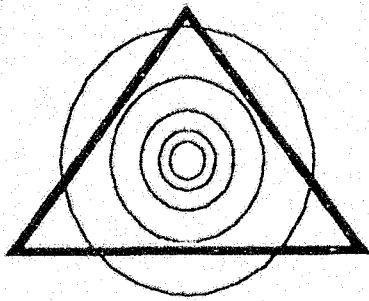
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RESHOOT OF CRACKS FROM 2/18/04 REPORT

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## LINDA DAVID'S HOUSE VIBRATION ANALYSIS & MAGNETIC FIELD STUDIES SPECIAL COMMENTS

On September 13, 17, 23 & 24, 2004, vibration analysis and magnetic field current measuring was done at the home of Linda David, 2922 Fairview, Allentown, PA.

We found very low readings generally as the enclosed results show except when the pump(s) were running at the water pumping station. Then we measured 5-10 times higher readings at distinctive frequencies that matched those frequencies present at the water station with the pumps running. When the pump shutdown at the water station, the vibration goes away at the house and the water station.

I physically felt the vibration in the main water pipe when my ring started rattling against the pipe. Ms. David rented a \$10,000 vibration meter and it printed out the chart shown in page 31. The distinctive almost impossible to duplicate by chance readings were duplicated at the water station. I believe there is almost a 100% connection between vibration in the house and the pump(s) running. Note, #19 shows a new crack at the location in the wall below which the water pipe comes into the house.

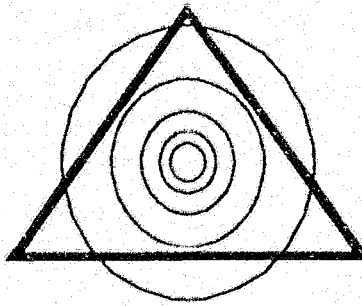
Before the water company wanted evidence, forcing Ms. David to hire us when they should have done the study at their own expense since we showed them the proper sound rubber isolation rubber sections weren't installed in their pipes at the pumping station.

Now the study is done. The water authority should install rubber sections immediately. To stall further is a cover-up in my opinion and not only should the authority be subject to fines, but those in charge should be held personally liable if action isn't taken.

We also measured circulating current in Ms. David's water pipes as the charts show. The ground rods we were going to install were installed, but an 8 foot rod cut into three sections drilled (yes, a hammer drill was necessary) into the rock only produced an ohm reading of 260  $\Omega$  when the normal is under 5 and the required at commercial, etc., by the National Electrical Code, is 25 ohms.

Well, we dumped 14.5 containers of salt and got it down to 36 ohms. The next day we put another 6 feet of rod in the ground only to still have the reading more than 30 ohms. Since the site probably needs another 14 or more large containers and another ground is somewhere in the house, the project was put on hold. Note, the fact is the soil around Linda's house is an extremely good insulator, such that only 2 or 3 locations where I've done testing at 1000 locations in 25 years equals the high resistance found at Linda's.

What this means is that much of the unbalanced (neutral) current flows back to the transformer closest to Ms. David's house through her water pipe from her neighbors houses through the pipes creating a magnetic field above the pipe as the magnetic field measuring device of PP&L showed.



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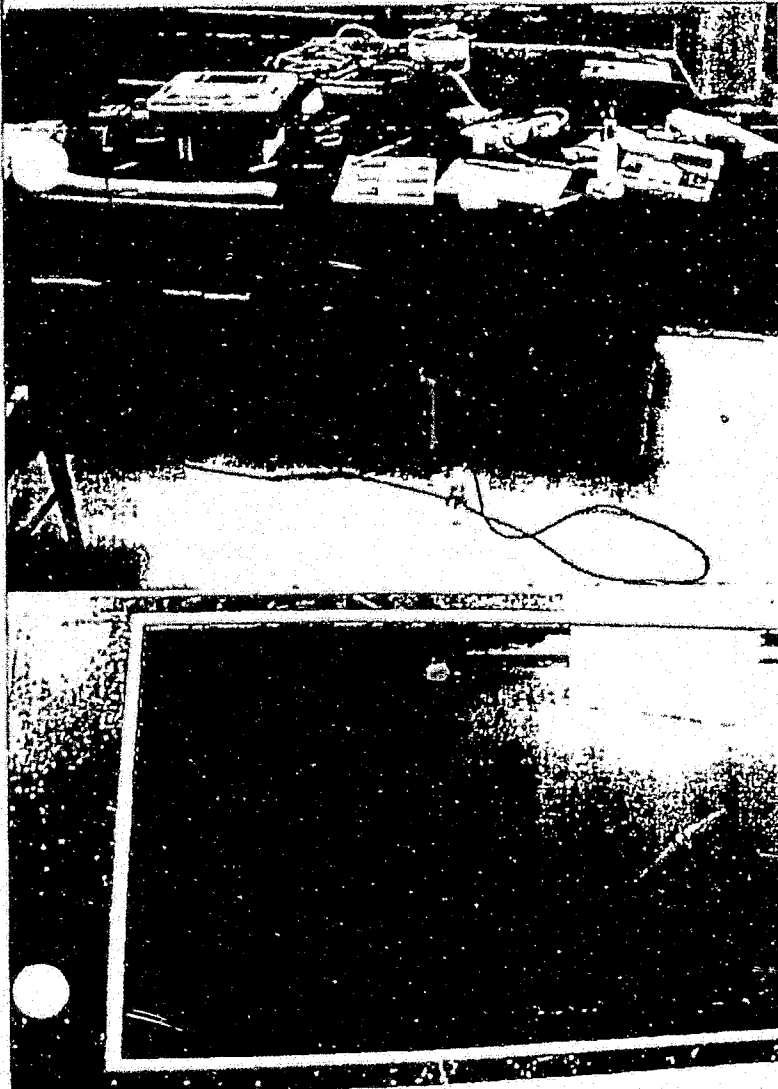
Page 2

Thus, the two effects could be present at the same time and turning off the pump wouldn't have affected the magnetic field (Mr. Uff said he felt like he was in an MRI) and the effects could be much worse than we measured at different times. Ms. Dawid says they are worse at night. Note, my forearm turned red after two days in her house.

Please call if you have any questions.

Sincerely yours,

*Alan A. Loch*  
Alan A. Loch



**ENTEK IRD**

**MODEL**

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
**LINDA DAVID**  
ALLENTOWN, PA

Problem #: 1                      DATE: September 15, 2004

MVC #: 200 & 208                      IR #: N/A  
**LOCATION**  
Baseline Done in Shop in Chester, Multipurpose Room

**EQUIPMENT**  
Floor (Vibration in Ground) Vibration Analyzer-EN TEK  
IRD, Model 838 Analyzer, Electrorent 1171k53, Model  
97019697, S/N 200004115 Probe

**PROBLEM**  
Noise 001 at 300

**COMMENTS / RECOMMENDATION**  
Vel. = in, in/S. For comparison  
**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem #: 2

DATE: September 15, 2004

MVC #. 201 & 202

IR #. N/A

**LOCATION**

Baseline done in Shop in Chester, Multipurpose Room

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Fan With Vibration Monitor on it

**PROBLEM**

1 at 1K and 22 at 5K.

**COMMENTS / RECOMMENDATION**

Vel = in inch/S. For comparison. Compare with problem  
pages #2 & 3 where probe further away.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

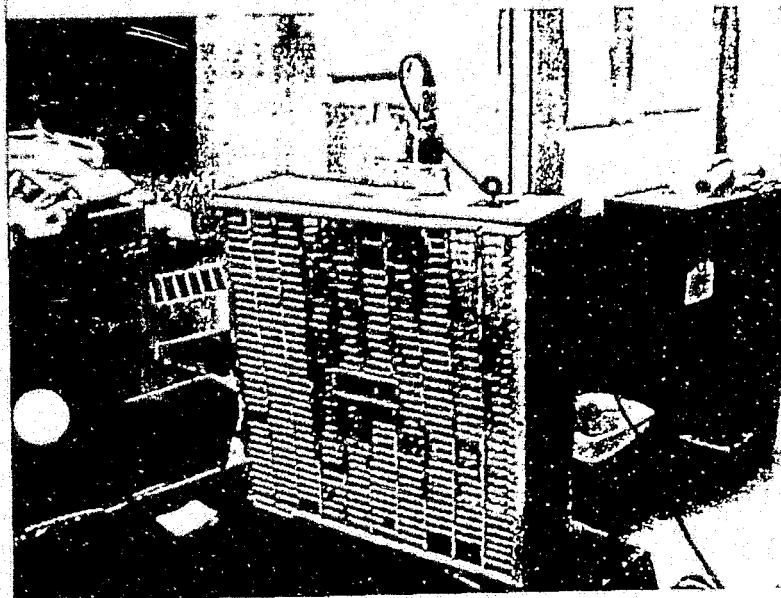
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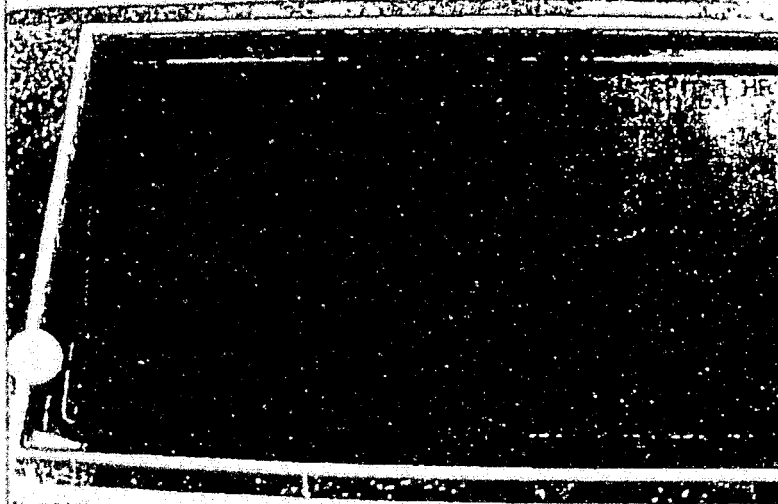
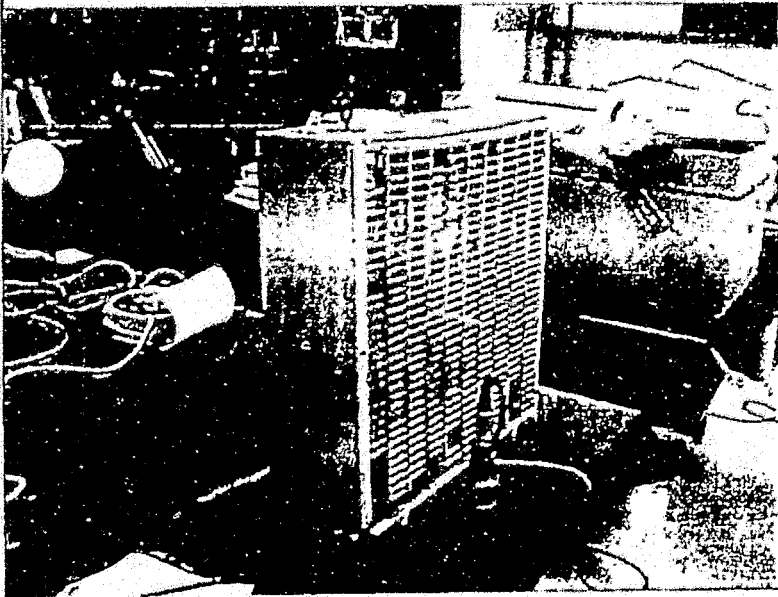
**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**ENTEK IRD**

MODEL 838 ANA





TEK IRD

**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
ALLENTOWN, PA

Problem #: 3                      DATE: September 15, 2004

MVC #: 203 & 204                      IR #: N/A

**LOCATION**

Baseline Done in Shop in Chester, Multipurpose Room

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe Fan with Vibration Monitor 6" in Front

**PROBLEM**

.09 at 1K and .07 at 5K.

**COMMENTS / RECOMMENDATION**

Vel - in/S. For comparison with problems pages #2 & 4.  
Note, this probe isn't on fan but on table besides fan.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem #: 4

DATE: September 15, 2004

MVC #. 205 & 206

IR #: N/A

**LOCATION**

Baseline Done in Shop in Chester, Multipurpose Room

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Fan with Vibration Monitor 0 Feet from It

**PROBLEM**

032 at 1K.

**COMMENTS / RECOMMENDATION**

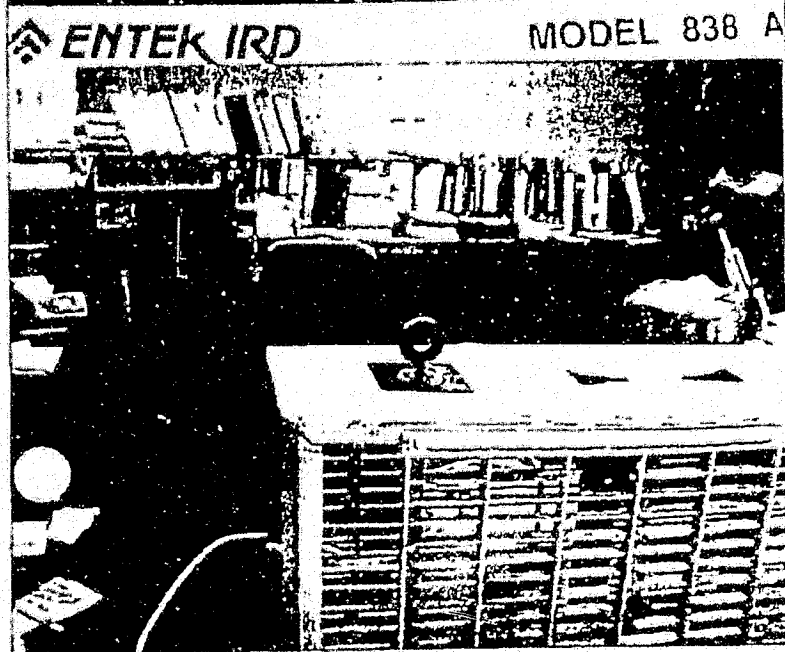
Vel = in/S. For comparison with problems pages #2 & 3.  
Note, probe is 8 feet away from fan.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:



**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
ALLENTOWN, PA

Problem # 5                      DATE September 15, 2004

MVC #. 209 & 210                      IR #: N/A

**LOCATION**

Linda David's House - Kitchen, September 17, 2004  
1.54 p.m.

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer.  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Floor with Refrigerator Off

**PROBLEM**

Wide band spectrum 0015 at 0-600.

**COMMENTS / RECOMMENDATION**

For record.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
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ACTION TAKEN:



**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
ALLENTOWN, PA

Problem # 6                      DATE: September 15, 2004

MVC #. 210 & 211                      IR #. N/A

**LOCATION**

Linda David's House-September 17, 2004  
1:59 p.m.

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Floor with Refrigerator On

**PROBLEM**

Wide bank as above and spiked of 0026 at 3600.

**COMMENTS / RECOMMENDATION**

For record Refrigerator caused spike

**MAINTENANCE HISTORY**

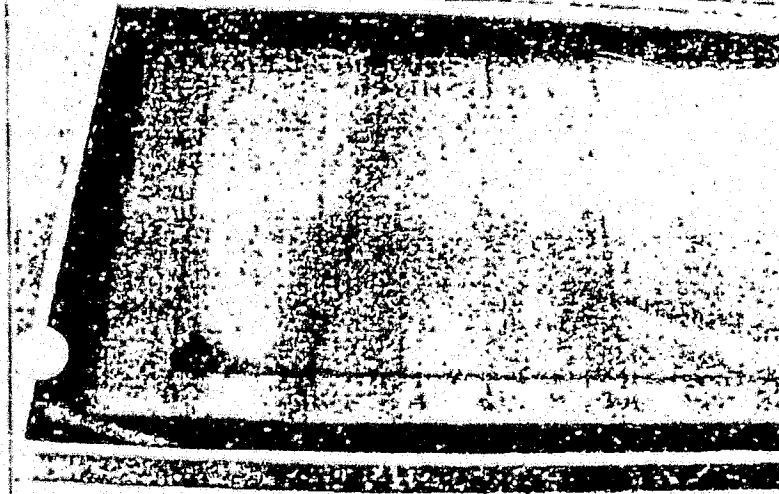
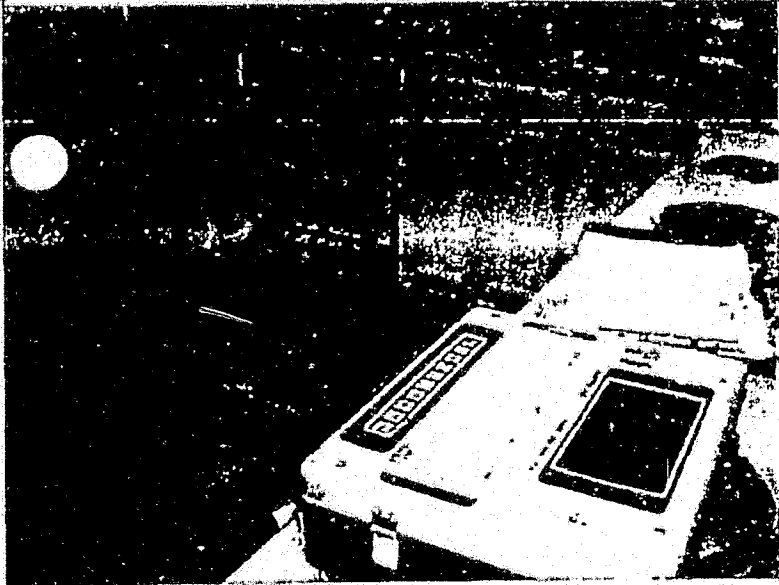
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DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
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DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



INTEL IR

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
ALLENTOWN, PA

Problem # 7

DATE September 15, 2004

MVC # 212 & 213

IR #: N/A

**LOCATION**

Linda David's House, Kitchen September 17, 2004  
1.58

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Floor with Refrigerator On

**PROBLEM**

Wide Bank as above and spike 101 at 3600 and spike 0005  
at 7200.

**COMMENTS / RECOMMENDATION**

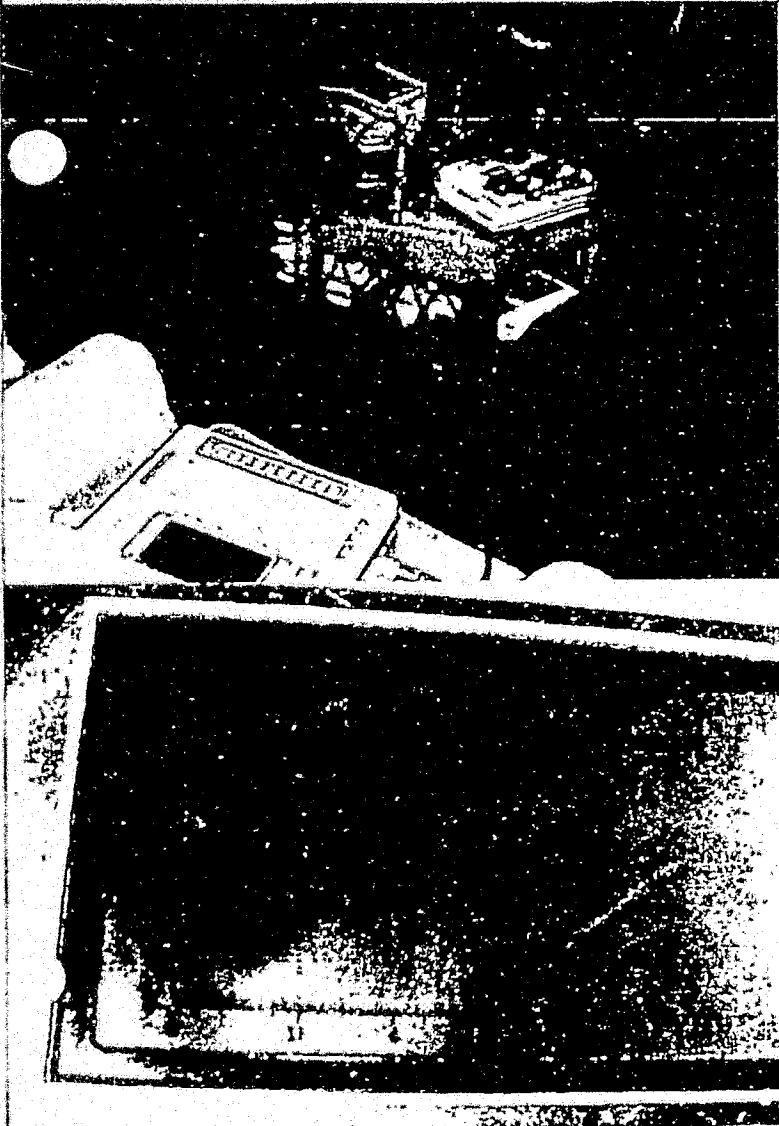
For record. Both spikes went away when refrigerator turned  
off

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:



**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
ALLENTOWN, PA

Problem #: 8

DATE: September 15, 2004

MVC #: 214 & 215

IR #: N/A

**LOCATION**

Linda David's House - Kitchen, September 17, 2004  
2 06 p.m.

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Living Room Table

**PROBLEM**

Wide band as shown 0015 at 0-250.

**COMMENTS / RECOMMENDATION**

For record.

**MAINTENANCE HISTORY**

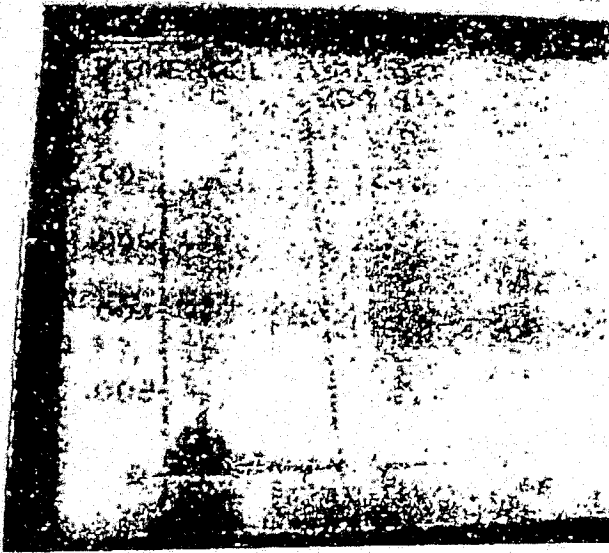
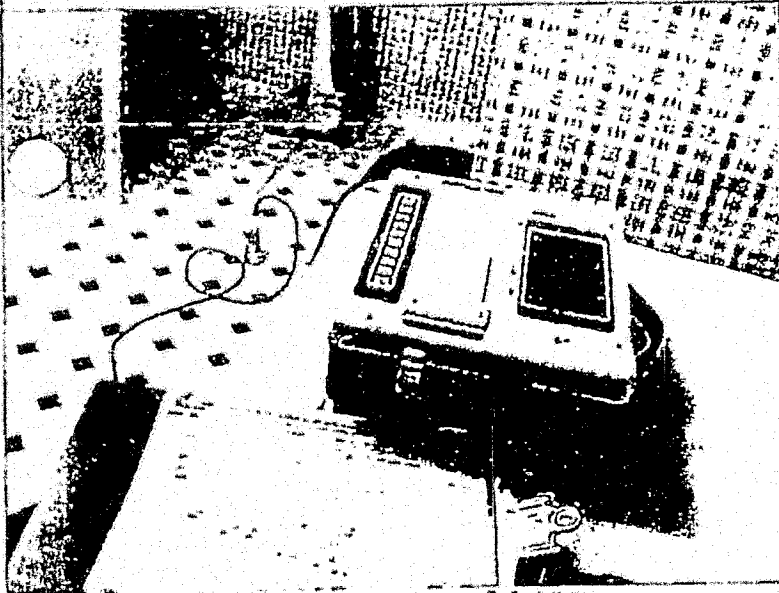
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**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 9

DATE: September 17, 2004

MVC #. 216 & 217

IR # N/A

**LOCATION**

Linda David, Laundry Room

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Floor 2.12 p.m.

**PROBLEM**

Wide band .0015 at 0-400.

**COMMENTS / RECOMMENDATION**

For information.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_  
ACTION TAKEN:



**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
ALLENTOWN, PA

Problem #: 10

DATE September 17, 2004

MVC #: 218 & 219

IR #: N/A

LOCATION

Linda David, Garage

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115

Probe - Floor 2:20 p.m.

**PROBLEM**

Wide band 0015 at 0-40

**COMMENTS / RECOMMENDATION**

For information.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
ALLENTOWN, PA

Problem #: 11

DATE: September 17, 2004

MVC #: 220 & 221

IR #: N/A

**LOCATION**

Linda David, Front Porch Concrete

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe -- Step 2.26 p.m

**PROBLEM**

Wide band 0011 at 0-400.

**COMMENTS / RECOMMENDATION**

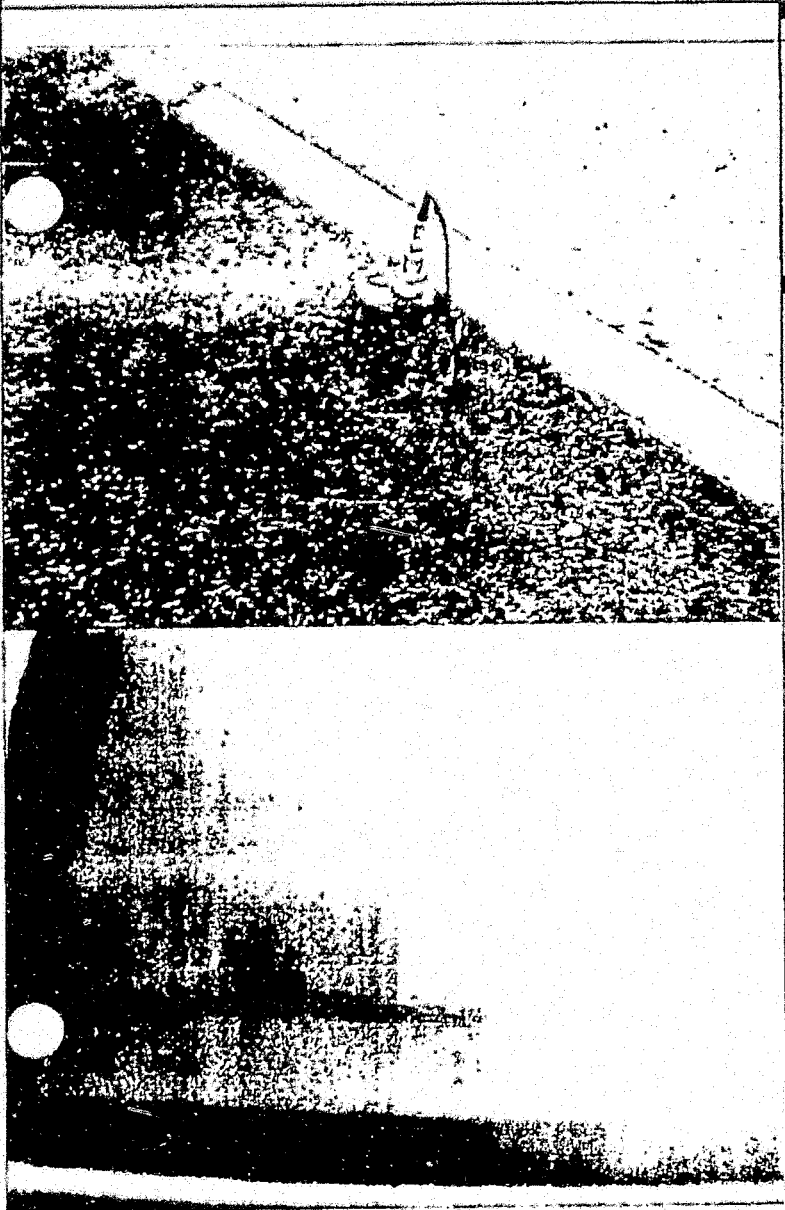
For information.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
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ACTION TAKEN:



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
LINDA DAVID  
ALLENTOWN, PA

Problem # 12

DATE September 17, 2004

MVC #: 222 & 223

IR #: N/A

**LOCATION**

Linda David, Water Turn Off Access – Front Yard at Street

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe – Water Vent 2:29 p.m.

**PROBLEM**

Wide band 0015 at 0-400

**COMMENTS / RECOMMENDATION**

For information.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_  
ACTION TAKEN:

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ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_  
ACTION TAKEN:

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
ALLENTOWN, PA

Problem # 13

DATE: September 17, 2004

MVC #. 224

IR #. N/A

LOCATION

Linda David, Next Door Neighbor

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115

Probe - Front Walk 2:34 p.m.

**PROBLEM**

Wide band 0015 at 0-400

**COMMENTS / RECOMMENDATION**

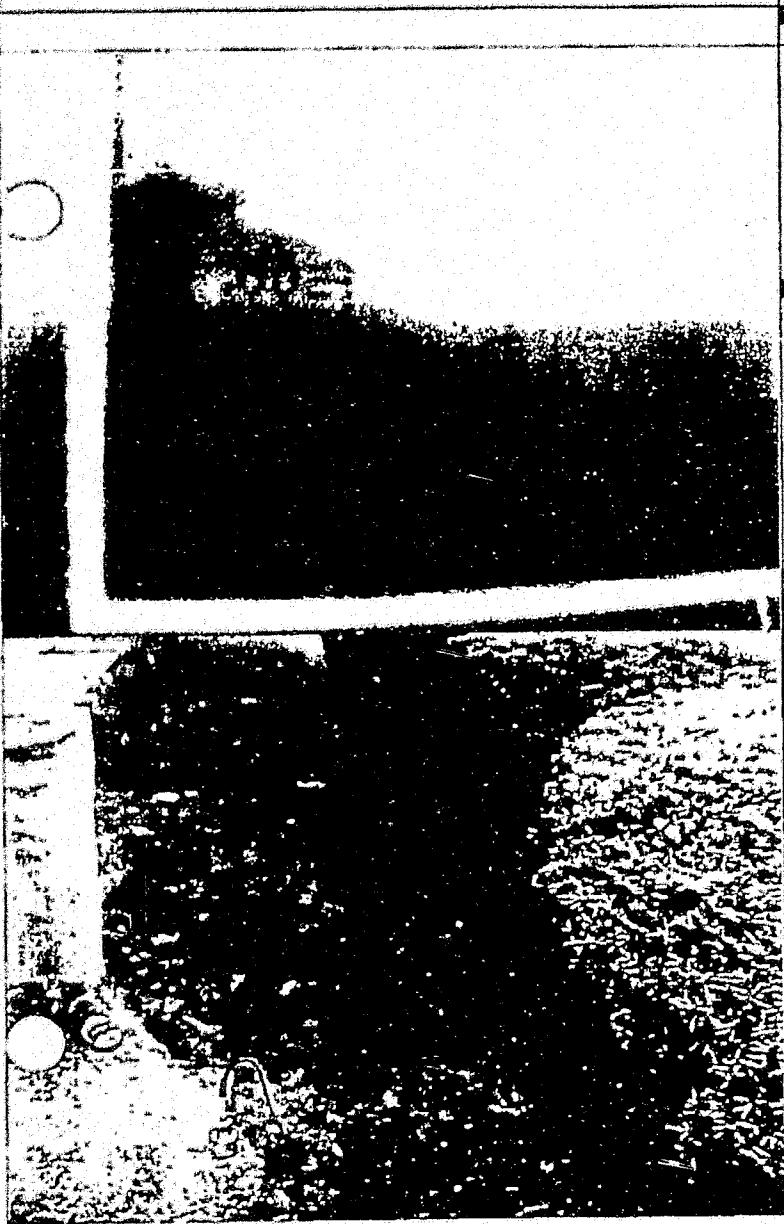
For information.

**MAINTENANCE HISTORY**

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DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

*For*  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 14

DATE: September 17, 2004

MVC #: 226 & 225

IR #: N/A

**LOCATION**

Linda David, Sidewalk (curved) Next to Parking Lot

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171K53, Model 97019697, S/N 200004115  
Probe - Sidewalk 2.37 p.m.

**PROBLEM**

Wide band 0012 at 0-400.

**COMMENTS / RECOMMENDATION**

For information.

**MAINTENANCE HISTORY**

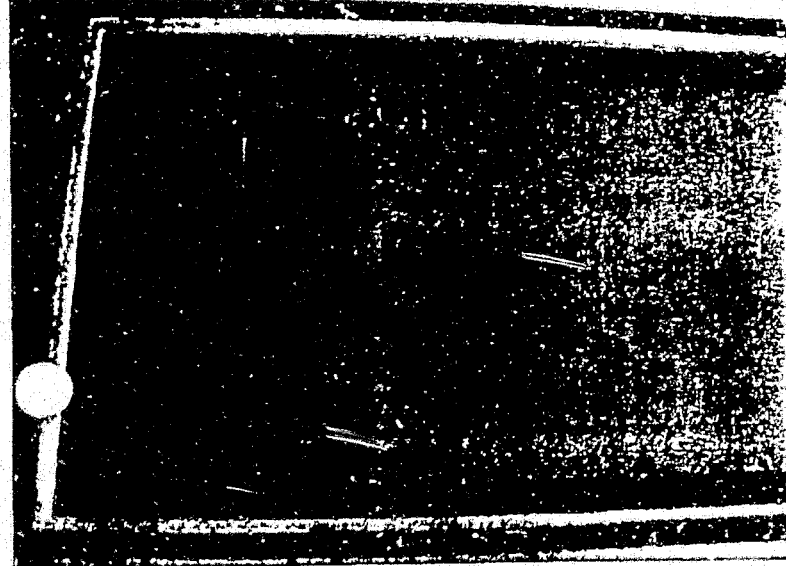
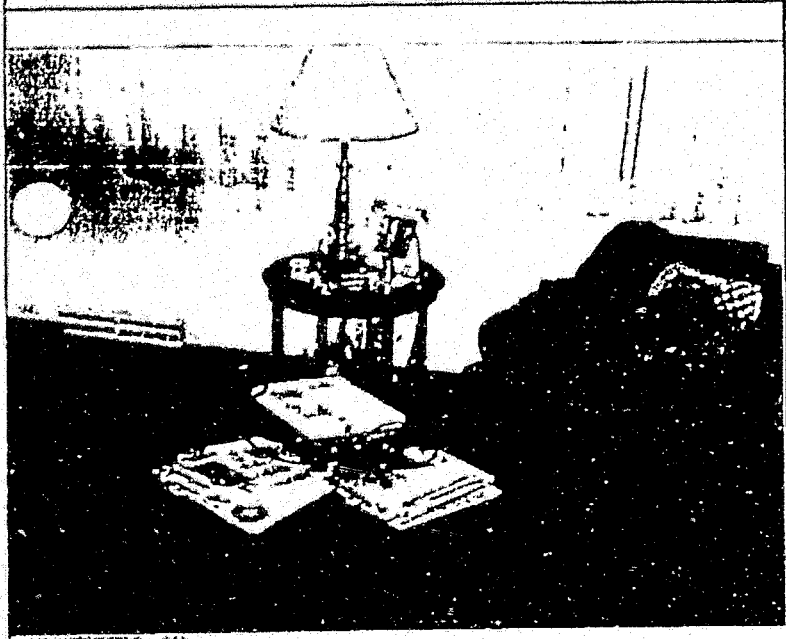
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DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
ALLENTOWN, PA

Problem #: 15

DATE: September 17, 2004

MVC #: 227 & 228

IR #: N/A

**LOCATION**

Linda David's House, Living room

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Living Room Table 2 43 p.m

**PROBLEM**

Wide band 001, wide band 0-400

**COMMENTS / RECOMMENDATION**

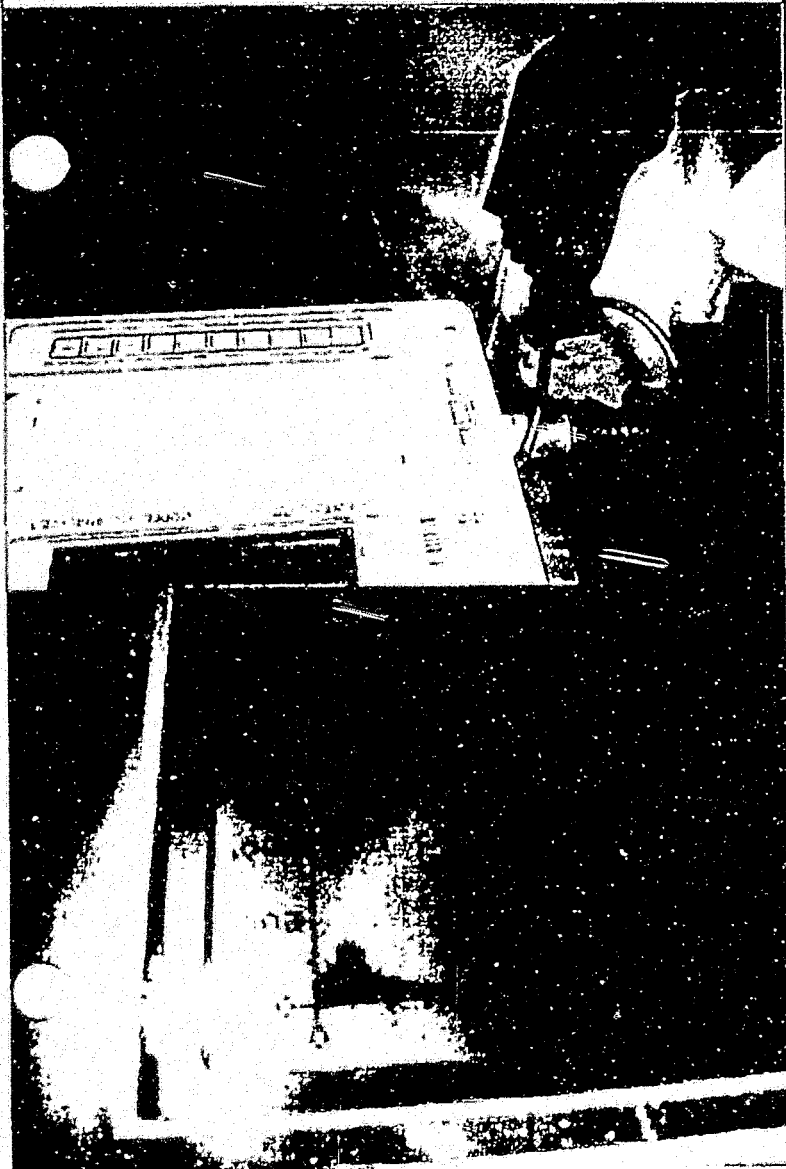
For information.

**MAINTENANCE HISTORY**

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ACTION TAKEN:



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

*For*  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 16

DATE: September 17, 2004

MVC #: 229 & 230

IR #: N/A

**LOCATION**

Linda David, Master Bedroom

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Bedroom Bed 2.56 p m

**PROBLEM**

Wide band .0015 at 0-400.

**COMMENTS / RECOMMENDATION**

For information.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
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DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 17

DATE: September 17, 2004

MVC #: 231 & 232

IR #: N/A

LOCATION  
Linda David, Dining Room

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Dining Room Table 3.20 p.m

**PROBLEM**

Wide band .0015 at 0-400.

**COMMENTS / RECOMMENDATION**

For information.

**MAINTENANCE HISTORY**

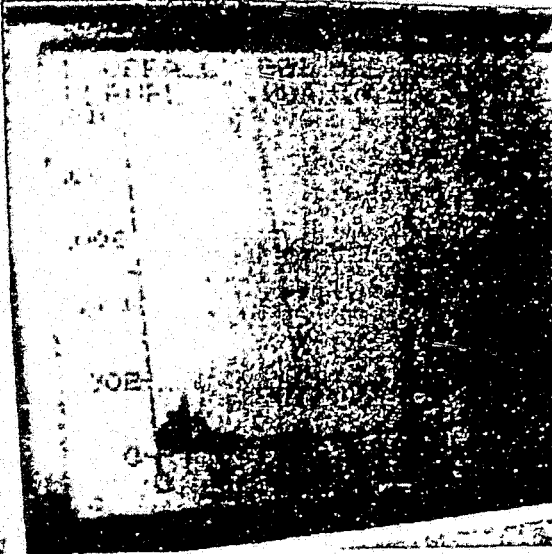
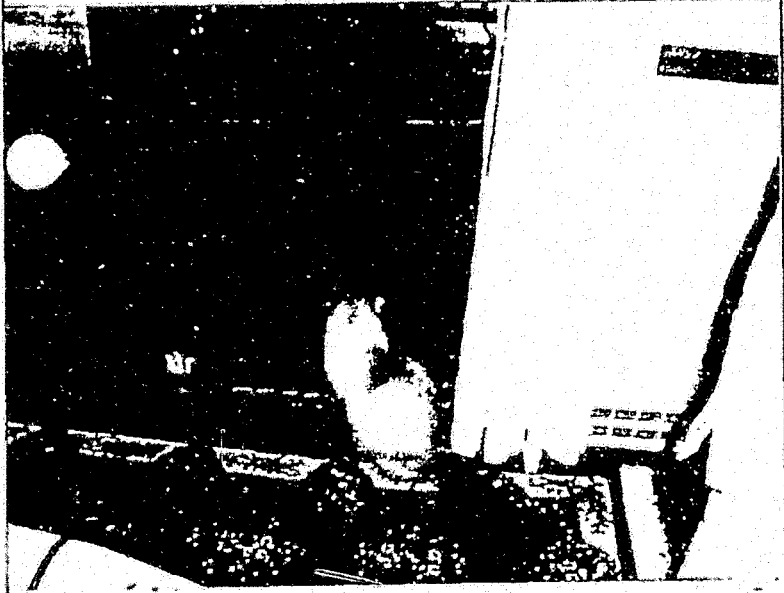
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ACTION TAKEN:

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
ALLENTOWN, PA

Problem # 18

DATE: September 17, 2004

MVC #. 233 & 234

IR #: N/A

LOCATION  
Linda David, Deck

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Deck Floor

**PROBLEM**

Wide band .001 at 0-400

**COMMENTS / RECOMMENDATION**

For information.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

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ACTION TAKEN:



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 19

DATE: September 23, 2004

MVC #: 255, 256 & 257

IR #: N/A

**LOCATION**

Linda David, Front of House above Main Water Pipe  
Entering Crawl Space

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Front Wall Under Window

**PROBLEM**

Wall is cracking probably due to vibration caused by water  
pumping station. New crack per DEP Blasting Division.

**COMMENTS / RECOMMENDATION**

Have water company immediately install vibration isolation  
rubber pipe sections, etc. They should have done earlier.

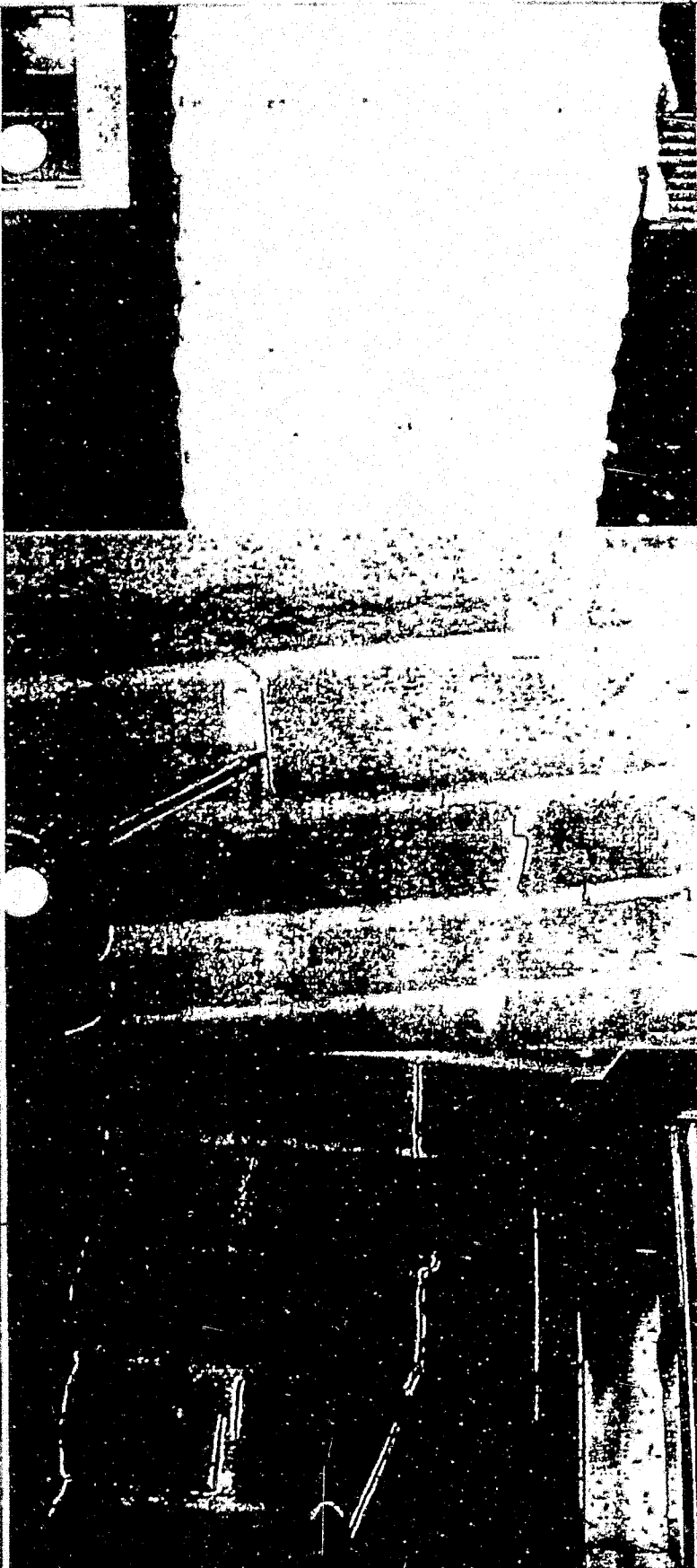
**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_  
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ACTION TAKEN:

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ACTION TAKEN:

**OVER SIZED DOCUMENTS**



**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
ALLENTOWN, PA

Problem # 20

DATE: September 23, 2004

MVC # 258, 259 & 260

IR #: N/A

**LOCATION**

Linda David, Garage Door

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Front Wall

**PROBLEM**

Cracks in front wall Probably from vibration measured in house that was traced to water pumping station.

**COMMENTS / RECOMMENDATION**

Find out why cracking.

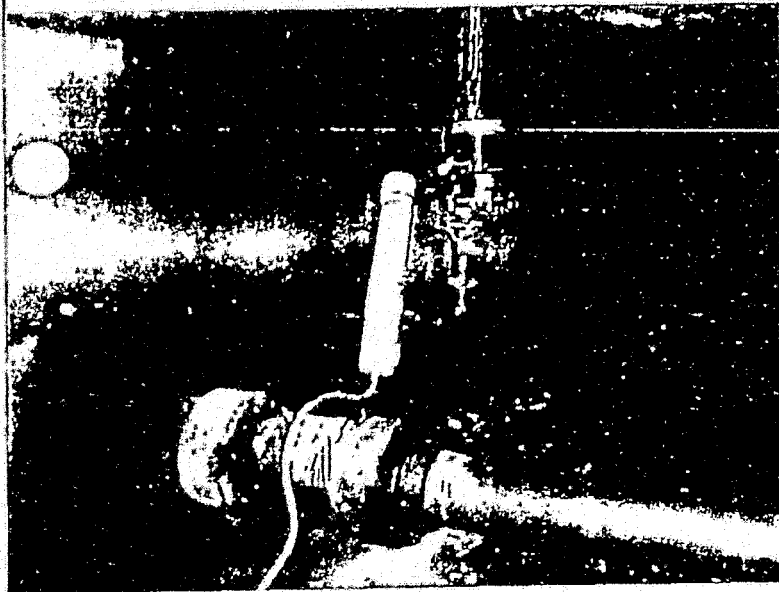
**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

**OVER SIZED DOCUMENTS**



NO THERMOGRAM NECESSARY

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

*For*  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 21

DATE: September 23, 2004

MVC # 261

IR # N/A

**LOCATION**  
Linda David, Crawl Space

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Water Pipe

**PROBLEM**

Magnetic field strong around pipe and traceable even on top of  
ground by PP&L's measuring device.

**COMMENTS / RECOMMENDATION**

Investigate. Current through pipe documented on following  
pages.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 22

DATE September 23, 2004

MVC #. 262 & 263

IR #: N/A

LOCATION  
Linda David, Crawl Space

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Incoming Water Line

**PROBLEM**

4.2 amps in pipe.

**COMMENTS / RECOMMENDATION**

Current causes magnetic field that is detectable by PP&L's measuring device.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED**  
**PREVENTIVE MAINTENANCE SURVEY**  
For  
**LINDA DAVID**  
**ALLENTOWN, PA**

Problem # 23

DATE: September 23, 2004

MVC #: 264, 265 & 266

IR #: N/A

**LOCATION**

Linda David, Crawl Space

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe

**PROBLEM**

Drove ground rods to Isolated Ground System from Other  
Houses. 230  $\Omega$  pipe. Three ground rods a total of 8 feet long.  
Ground Test to New Rods Ground Current surged 2-6 amps  
during day

**COMMENTS / RECOMMENDATION**

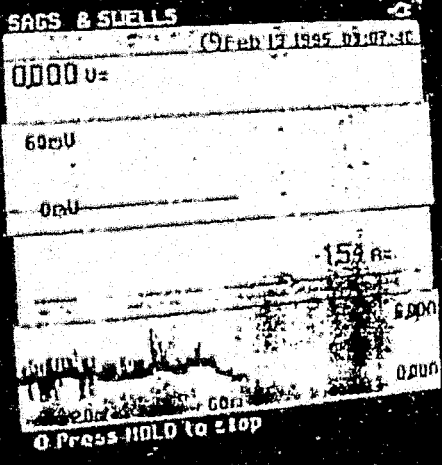
Lowered to 36 ohms using salt. Note, later drove in 3 more  
rods but couldn't get below 30 ohms.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:



**OVER SIZED DOCUMENTS**



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

*For*  
**LINDA DAVID  
ALLENTOWN, PA**

Problem #: 24

DATE: September 23, 2004

MVC #: 267

IR #: N/A

**LOCATION**

Linda David, Crawl Space

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Piers Added to Floor Support

**PROBLEM**

Vibration has made owner/owners put in 150% (over double)  
the number of floor supports, but cracks continue

**COMMENTS / RECOMMENDATION**

Other piers placed after original house construction. Notice  
"fresh" dirt and difference in foundation of piers.

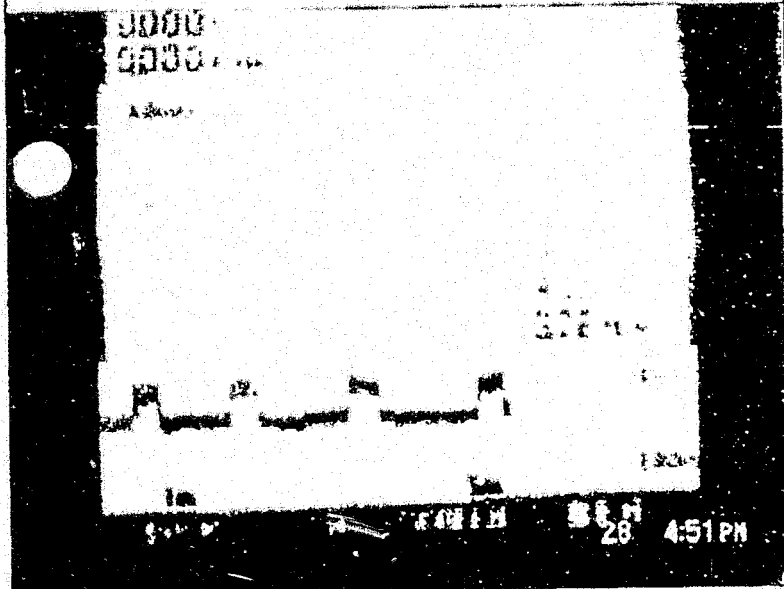
**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_  
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DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

**OVER SIZED DOCUMENTS**



NO THERMOGRAM NECESSARY

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
ALLENTOWN, PA

Problem # 25                      DATE: September 23, 2004

MVC #: 498                      IR #: N/A  
LOCATION  
Linda David, Main Incoming Water Pipe in Crawl Space  
11:30 a.m.

EQUIPMENT  
Clamp on Ammeter Reading-5 minutes worth of readings

PROBLEM  
4.28 amps in water pipe. Dropping to 3.72 amp minimum.

COMMENTS / RECOMMENDATION  
See problems #21 & 22.

MAINTENANCE HISTORY

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

**OVER SIZED DOCUMENTS**

ELRU

Dr. U

6.70 MAX  
368 Hz  
260 MHz

6.000

0.000

BACK

10

SCREEN

83 M

### INFRARED

#### PREVENTIVE MAINTENANCE SURVEY

For

LINDA DAVID  
ALLENTOWN, PA

Problem #: 26

DATE: September 23, 2004

MVC #: 292

IR #: N/A

#### LOCATION

Linda David, Main Incoming Water Pipe in Crawl Space  
11:30 a.m. - 4:00 p.m.

#### EQUIPMENT

Clamp on Ammeter Reading - 4 hours worth of readings

#### PROBLEM

6.7 amps. Maximum peak at 12:15 p.m.

#### COMMENTS / RECOMMENDATION

See problems #21 & 22.

#### MAINTENANCE HISTORY

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_

ACTION TAKEN: \_\_\_\_\_

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_

ACTION TAKEN: \_\_\_\_\_

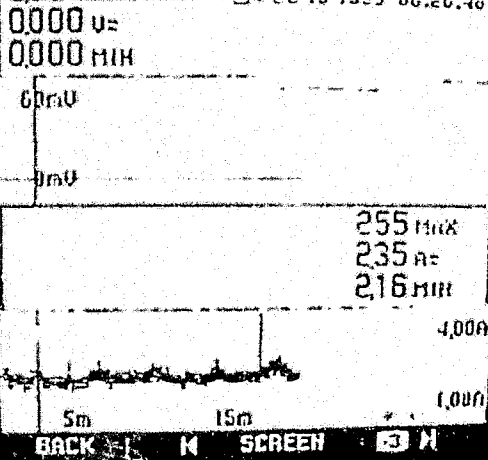
DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_

ACTION TAKEN: \_\_\_\_\_

NO THERMOGRAM NECESSARY

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



NO THERMOGRAM NECESSARY

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem #: 27

DATE: September 23, 2004

MVC #: 293

IR #: N/A

**LOCATION**

Linda David, Main Incoming Water Pipe in Crawl Space

**EQUIPMENT**

Clamp on Ammeter Reading - 15 to 20 minutes

**PROBLEM**

For 2.55 amps at about 4.00 p.m.

**COMMENTS / RECOMMENDATION**

See problems #21 & 22.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_

ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_

ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_

ACTION TAKEN:

**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY

For  
LINDA DAVID  
ALLENTOWN, PA

Problem #. 28

DATE: September 23, 2004

MVC #: 294 & 295

IR # N/A

**LOCATION**

Linda David, Main Incoming Water Pipe in Crawl Space  
September 23 - 4:00 to 8:00 a.m. September 24

**EQUIPMENT**

Clamp on Ammeter Reading

**PROBLEM**

High of 6.86 amps at 29.03 (9:30 p.m.) September 23, 2004.

**COMMENTS / RECOMMENDATION**

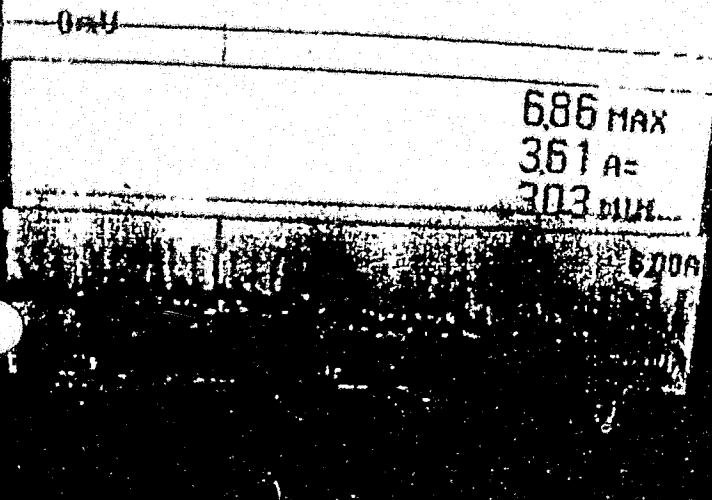
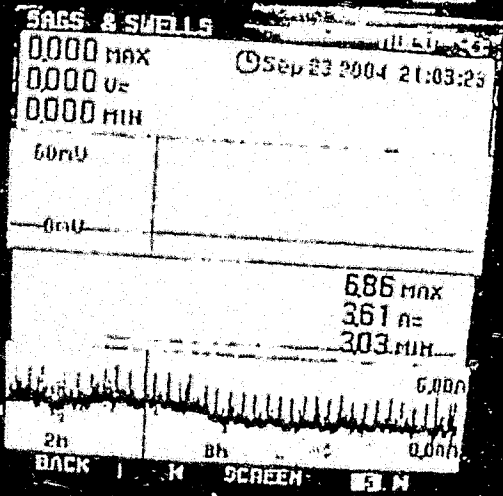
See problems #21 & 22.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

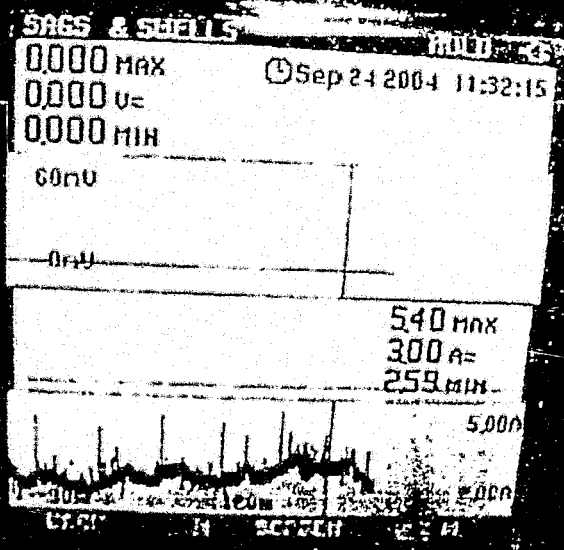
DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_



**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



NO THERMOGRAM NECESSARY

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
LINDA DAVID  
ALLENTOWN, PA

Problem # 29

DATE: September 24, 2004

MVC # 296

IR # N/A

**LOCATION**

Linda David, Main Incoming Water Pipe in Crawl Space  
Recorded from about 8 30 a.m. to 12:00 p.m.

**EQUIPMENT**

Clamp on Ammeter Reading

**PROBLEM**

High of 5 4 amps. High at about 11.30 a.m.

**COMMENTS / RECOMMENDATION**

See problems #21 & 22.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN.

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN

SAES & SWELLS  
 0000 MAX      Sep 24 2004 13:33:58  
 0000 U=      197 MAX  
 0000 MIN      178 AC  
 163 MIN  
 60mV  
 0mV  
 1000  
 1000  
 BACK    H    SCREEN    27    H

60mV  
 197 MAX  
 178 AC  
 163 MIN  
 1000

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
 AFTER COMPONENT REPAIR

**INFRARED**  
 PREVENTIVE MAINTENANCE SURVEY  
 For  
 LINDA DAVID  
 ALLENTOWN, PA

Problem #: 30      DATE: September 24, 2004

MVC #: 297 & 298      IR #: N/A  
**LOCATION**  
 Linda David, Main Incoming Water Pipe in Crawl Space  
 Recorded from 1:20 p.m. to 1:50 p.m.

**EQUIPMENT**  
 Clamp on Ammeter Reading

**PROBLEM**  
 1.97 amps at 1:33 p.m.

**COMMENTS / RECOMMENDATION**  
 See problem 21 & 22.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
 ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
 ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
 ACTION TAKEN:

**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY

For  
**LINDA DAVID**  
ALLENTOWN, PA

Problem #. 31

DATE: September 24, 2004

MVC #. 299

IR #: N/A

**LOCATION**

Linda David, Main Incoming Water Pipe at Meter  
9 13 a.m.

**EQUIPMENT**

Velocity Reading giving .0095 - Peak at 1.5K and .0021 at  
7.5K

**PROBLEM**

High readings of definite peaks

**COMMENTS / RECOMMENDATION**

See problems #32 & 33 These three readings link water  
pumping station with house vibration. Note, went to pumping  
station and found pump(s) running

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_

ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_

ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_

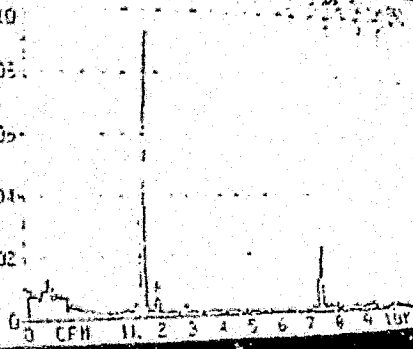
ACTION TAKEN:

NO THERMOGRAM NECESSARY

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

DATE \_\_\_\_\_ TIME \_\_\_\_\_ .010  
MACHINE \_\_\_\_\_  
UP. LOAD ( \_\_\_\_\_ PHM) .003  
FOOT. DEFLECT. \_\_\_\_\_ .005  
PUMP TYPE/ATTACHMENT \_\_\_\_\_  
NUMBER OF PAGES: 6  
OVERALL .003 GEE  
LEVEL .014 IN/S FEAK  
CURSOR: .000 IN/S FEAK  
G PHM  
IR MECHANICALS



**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY

For  
LINDA DAVID  
ALLENTOWN, PA

Problem # 32

DATE: September 24, 2004

MVC # 300

IR # N/A

**LOCATION**

Linda David, Door of Pumping Station while Pump is running 9.32 a.m.

**EQUIPMENT**

Velocity Reading with Peak of .002 at 1.5K and .008 at 7.5K

**PROBLEM**

High readings of definite peaks which match frequencies at house.

**COMMENTS / RECOMMENDATION**

See problems #31 & 33. These three readings link water pumping station with house vibration.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_

ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_

ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_

ACTION TAKEN:

DATE: 9/24/04 TIME: 9:32 AM

NAME: \_\_\_\_\_

F. (C) \_\_\_\_\_

NO. OF ATTACHMENTS: \_\_\_\_\_

NO. OF PAGES: 5

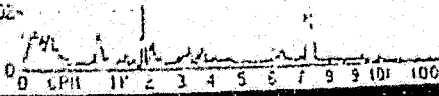
DEPT: 002 OSE

LEVEL: 013 INVS PER

CURSOR: .000 INVS PER

0 CFH

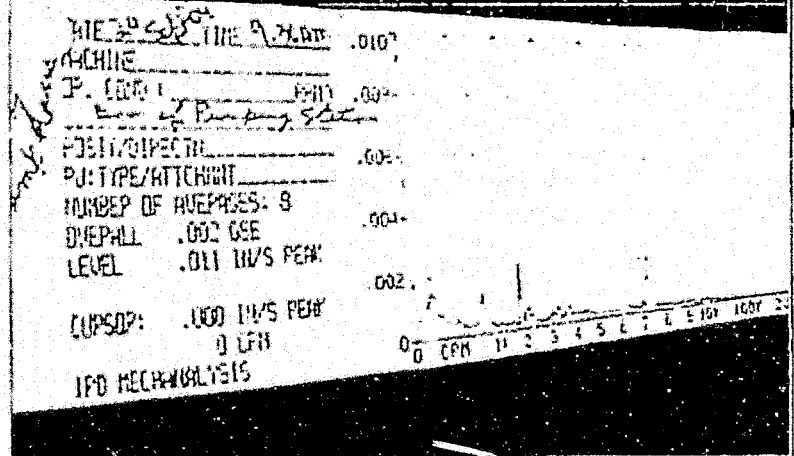
100 PERCENTAGE



NO THERMOGRAM NECESSARY

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



NO THERMOGRAM NECESSARY

**OVER SIZED DOCUMENTS**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 33

DATE: September 24, 2004

MVC # 302

IR #: N/A

**LOCATION**

Linda David, Door of Pumping Station while Pump is running 9:36 a.m.

**EQUIPMENT**

Velocity Reading with Peak of .002 at 1.5K and .006 at 7.5K

**PROBLEM**

High readings of definite peaks.

**COMMENTS / RECOMMENDATION**

See problems #31 & 32. These three readings link water pumping station with house vibration.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 34

DATE: September 24, 2004

MVC #. 303, 304 & 305 IR #. N/A

**LOCATION**

Top Graph at House Water Pipe Entering Crawl Space

**EQUIPMENT**

House Water, Manhole & Hydrant

**PROBLEM**

House vibration 5 times higher when pump running at pumping station

**COMMENTS / RECOMMENDATION**

High house vibration.

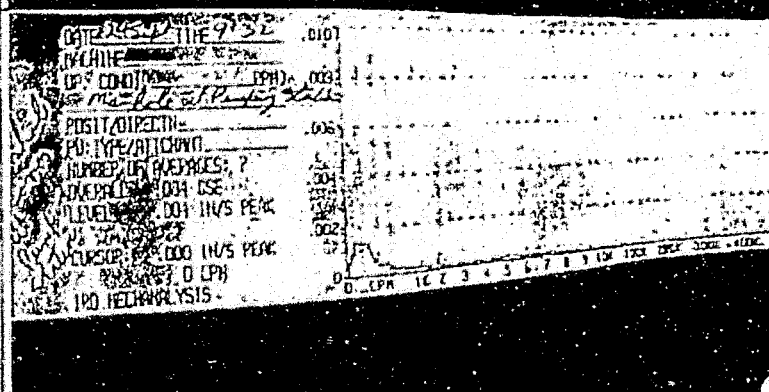
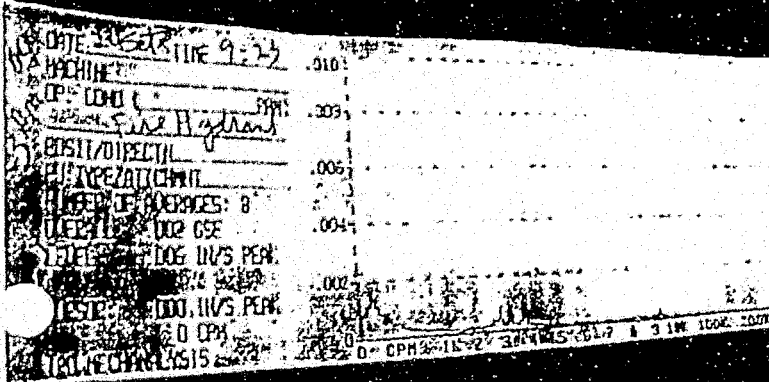
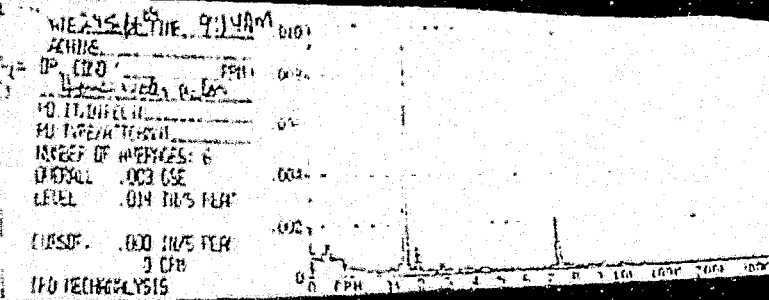
**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

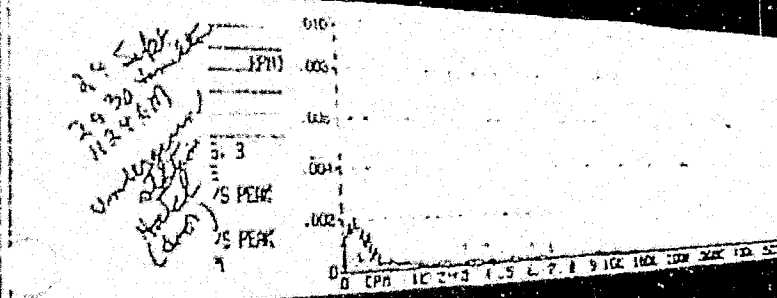
DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

**OVER SIZED DOCUMENTS**



DATE: 9/24/04  
 MACHINE: [unclear]  
 OP. COND: [unclear]  
 PART: [unclear]  
 NUMBER OF PAGES: 3  
 GENERAL: .002 USE  
 LEVEL: .010 IN/S PERI.  
 CURSOR: .000 IN/S PERI.  
 0 CPM  
 IRD MECHANICAL ANALYSIS



DATE: 9/24/04  
 MACHINE: [unclear]  
 OP. COND: [unclear]  
 PART: [unclear]  
 NUMBER OF PAGES: 6  
 GENERAL: .003 USE  
 LEVEL: .003 IN/S PERI.  
 CURSOR: .000 IN/S PERI.  
 0 CPM  
 IRD MECHANICAL ANALYSIS

**INFRARED PREVENTIVE MAINTENANCE SURVEY**

For  
 LINDA DAVID  
 ALLENTOWN, PA

Problem #: 35      DATE: September 24, 2004

MVC #: 306, 307 & 308      IR #: N/A

**LOCATION**

Wall of pumping Station when Not Running

**EQUIPMENT**

Pumping Station Door

**PROBLEM**

Vibration went away when not running pumps.

**COMMENTS / RECOMMENDATION**

Vibration low even on transformer compared to house when pump is running.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_  
 ACTION TAKEN: \_\_\_\_\_

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_  
 ACTION TAKEN: \_\_\_\_\_

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_  
 ACTION TAKEN: \_\_\_\_\_

**OVER SIZED DOCUMENTS**

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem #. 36

DATE: September 24, 2004

MVC #: 309 & 310

IR #: N/A

**LOCATION**

Transformer at VA - 2 Lighting Poles down at VA

**EQUIPMENT**

Equipment Around Pumping Station

**PROBLEM**

All objects very low readings compared to house when pumps at pumping station are running

**COMMENTS / RECOMMENDATION**

For record.

**MAINTENANCE HISTORY**

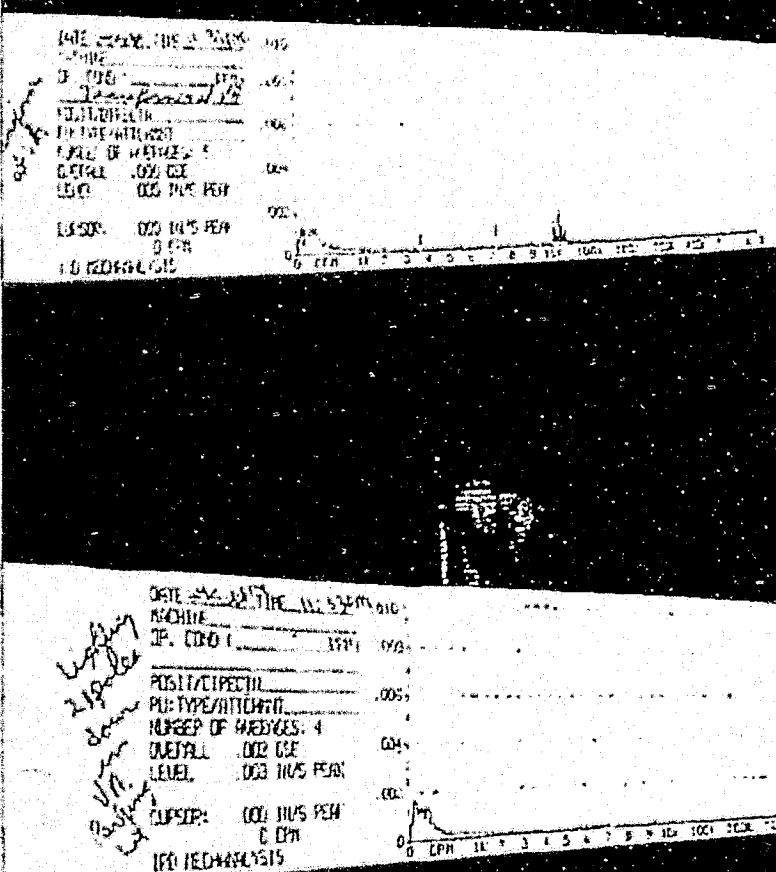
DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**OVER SIZED DOCUMENTS**



PPL Electric Utilities  
827 Hausman Road  
Allentown, PA 18104-9392  
Tel: 484-634-3100 Fax: 484-634-3767  
kmreadinger@pplweb.com




June 9, 2004

Linda David  
2922 Fairview Street  
Allentown, PA 18103

Dear Ms. David,

The attached map contains the location and the EMF readings taken on 6/8/04 at 2922 Fairview Street, Allentown, PA. The measurements were performed between 3:30 PM and 4:45 PM. Since magnetic field levels can change as the amount of electrical current changes, readings taken on other days or at other times on the same day may vary.

The magnetic field strength was determined using the EMDEX II measurement system. The measurements shown on the attached sketch are in milligauss (mg), or thousandths of a gauss and represent the density of the invisible magnetic lines of force present to the meter for that specific location and time. In reviewing the data provided, the highest magnetic field strength recorded at the site, 20 mg, was found directly in front of the water meter. 

Scientific Panels that have reviewed the research on magnetic fields produced by power lines and appliances have drawn two main conclusions. First, additional research is needed to explore concerns raised by some of the studies, and secondly, the large body of scientific evidence does not demonstrate that magnetic fields are harmful. Given those findings, PPL is taking a reasoned approach in responding to the EMF issue. We are supporting additional research and are also reducing magnetic field levels in new power lines when it can be done at no or low cost. Additionally, when requested, we are providing information on the EMF subject to our customers and employees.

If you have any questions on the results of the measurements or need further assistance, please call me at (484) 634-3100.

Attachment

Sincerely,

Kristie M. Readinger  
Support Engineer, Field Services



Memorial Day -

Surging through chairs was so awful - very painful - cried again.

Late afternoon

Called PPL. She called someone regarding electric intensity, relating to Pump Station. Was turned down - up in a few minutes. Later, went back up to a misery level.

Wrote a letter to PPL - was mad.

June 1 } Very strong surges every 2 hrs,  
June 2 } all night long - starts @ 10:45

Fill up lots of pillows. Arms ache - hands feel numb.

June - Visit by 2 EPA engineers - Phila.

June 3, 2004 - 2 township men came

shut pumps off in order to show vibs. in there do not match pumps. Al Lock came up here. He went into pump house.

But, I'm not convinced because I feel the sound & thud & floors shake. Nothing else outside would be the source. Al went under

house - checked if H<sub>2</sub>O meter was grounded. Taped one of those support beams - Grade A was supposed to have fixed it.

Some insulation is coming down.

Al said pump was done very professionally. Sound isolators are still needed, in my view and a full pad. I'll bet that would help.

~~Called Barbara, she's bad.~~

Fumes in here are bad; burns eyes, nose, mouth. (tastes bad)

June 2 - They said to get a dehumidifier & downspout green thing.

He said radon @ radon pipe was a lot! She said mold must be making me sick, but they didn't source I smell something burning @ times. <sup>crawl space</sup>  
Air test only. had 2% mold

EPA - "Hard to prove where vils. are from." Contact Sierra Club.

Sick of it all!

Mr. Reimer - needs to make a calls!

Jan, 6, 2005

Louisa, EPA (WV)

This report was issued after [11/11/05] sent info. to Rick Santorum's office. It is more than interesting to me that moisture was reported to be a problem in the crawl space. The 2 engineers who were here <sup>(JUNE)</sup> did not access the crawl space. It was reported to be dry by the structural engineer and Al Lock. Both of them spent time under the house.

The EPA report talks about mold. "Air Care" from Bethlehem tested and only came up with 2% mold - very small amount.

A report wasn't written after the visit to my home - only after contacted by Sen. Santorum's office. Odd to me!

The report finds stray currents @ the transformer pole leading to my house. PPL tested and said there were no stray currents. But, the air in here is different. I talked to Jim Ebert, a man from a Chem Lab in N.J. He said it sounds like Ozone. A recent report in the AARP magazine says it is literally deadly! A man from the South Mitchell Township, who picked up papers here, said it feels like an MRI machine in here. My saliva bubbles as soon as I come home.

Heating ducts were cleaned - \$750.00, and the rock dust still sprays around. I think the vibrations are causing that.

June 2nd  
#11/11/05  
Some part of coil was placed on Hamilton Blvd behind the Credit Union - after the EPA visit.

Next, a friend from Florida found this info. on vibrations on the internet - also a case from B.C., Canada, which sounds very much like my situation. Trouble is it is so tiny - needs to be enlarged. Trust you can do that? It may be helpful.

The seismograph test in garage - kind of a joke. I do not believe results. Purpose says "309 - Montgomery Co." I do not live there. He didn't want to put it in the house. Why?

But, noise results are high. It ran all night. No traffic then, etc. Took @ vib. notes and compare. Pictures of cracks show lots of damage here. He wasn't here himself. Sent 2 kids to set it up. Bill says 2 seismographs for <sup>the</sup> price. I got one. I called. He said it was overnight - that's why! I'm not sure if this was a credible concern!

By the way, Al Lich, Trinity Associates, does tests for lots of companies. "Terayon" uses him for troubleshooting, etc. He has spent a whole day there - under the house. He did more to investigate than any of the so-called credible giants involved with the pump station. P.L. lied and wouldn't come when I first called. South Whitehall is not credible - nor Pidcock - if they are the ones installing pumps without sound

isolators or full insulation pads. To me,  
very negligent. Those engineers with  
all kinds of licenses behind their names,  
should have known better. Not credible  
to me @ all!! Some licenses should be  
revoked.

I'll be speaking with  
you, again,

Linda David

P.S. - Sorry, I still do not have a  
computer to type things. Maybe  
some day!

Thurs. June 17, 2004

9:00 Reichenbach's cleaned ducts - \$750.00  
HOLY GOW

1:00 PPK "young" engineers came to test for stray electric volts. None found - so they say. Kristie said she checked the phone record and I didn't call PPK on Memorial Day. I most certainly did! She is lying! Blue & white page is still by the phone w/ customer service # started. They can & did tone down electrical currents on Memorial Day. I was next to tears because of the intensity. It was toned down w/in minutes!



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

NOV 22 2004

The Honorable Rick Santorum  
United States Senator  
5802 Federal Office Building  
504 West Hamilton Street  
Allentown, Pennsylvania 18105

Dear Senator Santorum:

Thank you for your October 6, 2004 letter on behalf of your constituent, Ms. Linda L. David, regarding her concerns that a nearby water pumping station owned by South Whitehall Township is producing vibrations and stray electrical currents that are impacting her dwelling and her health in Allentown, Pennsylvania.

The U.S. Environmental Protection Agency (EPA) does not have legislative authority to address environmental problems in residential buildings. However, in order to provide as much assistance as possible for this complex situation, building science experts from EPA's Region III office visited Ms. David's home on June 2, 2004. A synopsis of their findings at the time of this visit showed the following: very low levels of stray electrical current, except near the transformer pole that services the dwelling; barely detectable vibrations were observed in the home with one pump at the station running; some water infiltration problems in the crawl space of the dwelling, and light mold growth and excess dirt and mold in the ventilation ducts. In total, we considered the impacts observed from the pump to be minimal.

I would like to show my continued support by offering the assistance of the Region's building science expert, Mr. Francis Dougherty as a resource by telephone. If you have any questions, please feel free to contact me or have your staff contact Ms. Stacie Driscoll, Acting Pennsylvania Liaison Officer, at 215-814-3368.

Sincerely,

A handwritten signature in cursive script that reads "Donald S. Welsh".

Donald S. Welsh  
Regional Administrator



PPL Electric Utilities  
827 Hausman Road  
Allentown, PA 18104-9392  
Te: 484-634-3100 Fax: 484-634-3757  
kmreadinger@pplweb.com



June 22, 2004

Linda David  
2922 Fairview Street  
Allentown, PA 18103

Dear Ms. David,

We conducted a stray voltage investigation at your home on 6/17/04 between 1:00PM and 2:30PM. First we measured the voltage between the neutral conductor in your meter base and ground across a 500 ohm resistor and read 0.13 Volts. Next we took measurements around your home from ground to ground spaced about 6 feet apart. These also were measured across a 500 ohm resistor, as is standard practice. Included is a diagram of the measurements we found. The highest measurement was taken in your backyard between the patio and deck and was 0.0029 Volts. All of the measurements taken are very low and would not be noticeable. Typically values less than 1 Volt are not of a concern. As you can see, the measurements we found are much less than that limit.

If you have any questions concerning this report, please do not hesitate to call me at (484) 634-3100.

Thank-you.

Attachment

Sincerely,

A handwritten signature in cursive script that reads "Kristie M. Readinger".

Kristie M. Readinger  
Support Engineer, Field Services

1800 One Liberty Place  
Philadelphia, PA 19103-7395  
Phone: 215 864 7000  
Fax: 215 864 7123

Louisa T. Chen  
Direct Dial: 215.864.6399  
Direct Fax: 215.789.6665  
chenl@whiteandwilliams.com

February 15, 2005

The Pidcock Company  
Attn: Steven Henning, P.E.  
Manager of Environmental Division  
Oxford Drive at Fish Hatchery Road  
2451 Parkwood Drive  
Allentown, PA 18103-9608

Mr. Thomas Uff  
South Whitehall Township Water Authority  
4444 Walbert Avenue  
Allentown, PA 18104-1699

**RE: Linda David's Claim at South Whitehall Township Authority  
Hamilton Boulevard Booster Pump Station**

Dear Gentlemen:

Please be advised that my firm represents Linda David for personal injuries and property damage she sustained as a result of the vibration originating from the above-referenced facility.

I understand that Mr. Alan A. Loch from Trinity Associates has sent you earlier reports documenting the damage to Ms. David's home. Enclosed please find Mr. Loch's latest vibration analysis report performed in September, 2004. The report states that the vibration readings in Ms. David's home duplicate the vibration readings at the water station.

Please be advised that I am prepared to bring action against you on behalf of my client. Please review Mr. Loch's report and forward this letter and report to your insurance company. Please have a claim representative contact me. If I do not hear from you within the next two weeks, I will file suit. Thank you.

Very truly yours,

**WHITE AND WILLIAMS LLP**

By:

Louisa T. Chen

LTC:bn  
Enclosure

# STEVENS & LEE

## LAWYERS & CONSULTANTS

190 Brodhead Road  
Suite 200  
P. O. Box 20830  
Lehigh Valley, PA 18002-0830  
(610) 691-7111 Fax (610) 691-7175  
www.stevenslee.com

2/28/05

Direct Dial: (610) 997-5060  
Email: bcm@stevenslee.com  
Direct Fax: (610) 371-8411

February 23, 2005

Louisa T. Chen, Esquire  
White & Williams, LLP  
1800 One Liberty Place  
Philadelphia, Pennsylvania 19103-7395

Re: Linda David vs. South Whitehall Township Authority

Dear Ms. Chen:

Please be advised that the undersigned is Solicitor to South Whitehall Township Authority. I am in receipt of a copy of a letter dated February 15 which you wrote to The Pidcock Company and to Mr. Thomas Uff of the Authority which suggests a claim against the Authority for damages allegedly incurred by Ms. Linda David. As you know, South Whitehall Township Authority has spent a significant amount of time investigating Ms. David's claim, and notwithstanding the suggestions made by Trinity Associates about the cause of the problems being experienced by Ms. David, the Authority and its engineer have seen no credible evidence that the problems are caused by the activities of the Authority or the functioning of the Hamilton Boulevard Booster Pump Station.

Accordingly, I have asked the Authority staff to remit your February 15 letter, together with its attached information, to the Authority's insurance carrier for its review.

Very truly yours

STEVENS & LEE

  
Blake C. Marles

BCM:cjd

cc: South Whitehall Township Authority  
Mr. Gerald J. Gasda, Township Manager, South Whitehall Township  
Mr. Dennis E. Harman, P.E., P.L.S., The Pidcock Company

Philadelphia • Reading • Valley Forge • Lehigh Valley • Harrisburg • Lancaster  
Scranton • Wilkes-Barre • Princeton • Cherry Hill • New York • Wilmington

A PROFESSIONAL CORPORATION

I need to think PPL was a great co. Not any more!

# Connect

ppl

PPL Electric Utilities

Ms. Linda David  
2922 W. Fairview St.  
Allentown, PA 18103-2818

NOT TRUE AT ALL.

Aug. 2, 2005

## Prepared for the future

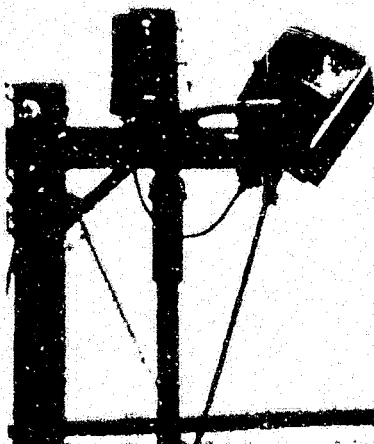
Linemen and electricians help keep your service reliable and respond 24/7 when you report outages and other electric service problems.

Their work is demanding and dangerous. It requires skill, extensive training and a commitment to service.

To continue providing you with a high level of service, PPL Electric Utilities recently hired more than 100 people to prepare for jobs as linemen and electricians. We review and anticipate our needs and will continue to recruit new employees to maintain a superior level of service.

The new employees have passed our rigorous testing, interview and selection process. They have begun formal training and are learning many aspects of the job by working alongside our experienced linemen and electricians, some of the top people in the business.

We have established relationships with some of the top trade schools in the region to recruit the best candidates for future openings. These future line and electrical workers are the people who will keep your service reliable for years to come.



### how to get in touch

Customer service:

**1-800-342-5775**

Automated phone lines are open 24 hours a day, seven days a week. Customer service representatives are available Monday through Friday, 8 a.m. to 5 p.m.

Telecommunications Device for the Deaf:

**1-800-231-7288 TTY**

Write to us at:

**Connect**  
827 Hausman Road  
Allentown PA 18104-9392

Visit us on the Internet at  
[www.ppelectric.com](http://www.ppelectric.com)

2/1/7 may apply  
to the wealthy or  
prominent members  
of the Lehigh Valley,  
but not an  
ordinary citizen.

I called repeatedly  
from Jan. - June  
of 2004. Nobody  
from PPH came. Was  
told to "investigate  
on my own." Imagine!  
Had to get the EPA  
here from Phila. to  
find stray voltage →

When 3 pumps are on keep  
Coming into my  
home from a  
transformer -

Worst part -  
DATE -  
June 2, 2004  
At 2:00 A.M., 5:00 A.M., etc.

One can only guess  
what damage was  
done to my  
nervous system!

It continues to  
be a problem. You  
and S. Whitehall are  
shooting 6 AMPS of  
electricity through the  
H<sub>2</sub>O pipes from the pump

Station  
EPF19211004652-67 Hamilton Blvd.

Linda David  
Feb. 27, 2005

THIS IS JUST DAILY NOTES FROM JAN. AND FEB \_ TIMES WHEN THE PUMPS AWAKEN ME/AND THE VIBRATIONS ARE TERRIBLE:

Jan. 6, 2005 - Louisa will sleep here. Wonderful!

Jan 7, 2005 - A terrible night; vibrations that could kill!

2:00 A.M.

5:00 AM

7:00 A.M.

Sent British Columbia case to Louisa.

Jan. 8, 2005 - Sent letter of complaint to Attorney General via Santorum's office.

Jan. 9, 2005 - o.k. night - 10:00 A.M. & 1:00 P.M. -greater intensity!

Now, dents - quarter-size are showing up on the ceilings. Some floor boards are making noise. Had none of that before!

Al Loch said some insulation is coming down under the house.

"Pounding " sound - most awful & scary!

Had spark plugs in car replaced. Now, it is not idling right ,again. Environmental guy said an increased magnetic field can affect the plugs. Batteries in a hand-held tape recorder need to be replaced & a battery operated alarm clock. The refrigerator motor isn't running right, either. Telephone answering machine doesn't always work, as well.

Car shouldn't need plugs with only 50,000 miles on it.

Jan. 9, 2005 - As I pulled out of the driveway, I noticed some of the roofing shingles are puckering. Should not be; it is only 10 years old. Was new when I moved here. I paid for half - former owners paid half.

Jan. 11, 2005 12:25 AM. - Awful noise & pounding!  
Electrical intensity greater, again. Allentown has a noise...

Allentown has a noise ordinance - Should be sent to South Whitehall.

The Pidcock Co. is a landscaping firm -are they qualified to install a pumping station? Standard installation? State inspections ?

Jan. 13,2005 - Awakened at 7.00 A.M. -Loud!  
11:30 A.M. & 1:00 P.M. Greater speed & electrical intensity. Red face. Darn! No camera!  
10:30 P.M. Awful noise & pounding - Whole house shakes - including the furniture.

Feel so dizzy!

More cracks - dining room & my bedroom

Smell of oil, at times. I do not have an oil burner - all electric home!

Jan. 14, 2005 - I did alert Keystone Bank about a possible foreclosure, NOT FAIR!! Then, watch lousy South Whitehall buy the property from the bank - cheap - & make a parking lot out of it. South Whitehall are cruel criminals, in my view. This may have been the plan-force people out of their homes to obtain the property without paying full market value! \*

Nobody should have to live like this!!!

Where are the laws that protect my rights as a property owner? \*

Jan. 14, 2005 - Shaken out of bed at 2:00 A.M., 5:00 A.M., 7:00 A.M. Electrical intensity - you can taste it!!  
9:00A.M. 11:00 A.M. & 1:00 P.M.

Jan. 15,2005 - Went to bed at 2:30A.M. after Trump visit - Slept until 12:45 P.M.! WOW!

Jan.17, 2005 8:00 A.M. fast speed of pumps heard & 2:00 P.M.

Jan.18, 2005 - 12:00 A.M. & 3:00 A.M. - Loud!! Bed shakes!

Living room ceiling - dents & cracks - awful!!

Jan. 20,2005 - @:00 A.M. & 3:30 A.M. - Loud! Bed shakes,air quality is terrible - rock dust, ground pounds under the house. You can taste electrical intensity. Ozone?

Earl Stafford should be sued,also. What zoning laws were violated?

Feb. 2,2005 - Circular nail marks more visible in laundry room & garage!

Up at 3:15 AM.

PROPERTY  
MANAGER

- Jan. 25, 2005 - Awakened at 2:15 A.M. - shaken to bits!!
- Jan. 26, 2005 - Up at 5:45 A.M. - Numb hands - bed shakes
- Jan. 27, 2005 - 2:15 A.M. & 3:15 A.M.
- Jan. 30, 2005 - Slept better, although hands numb at 8:10 A.M.
- Jan. 31, 2005 - 3:10 A.M. Awful!  
11:00 P.M. & 8:00 P.M. !!

Feb. 1, 2005 - Midnight - cried - couldn't sleep - pump loud & vibrations were terrible. I turned the heat off for a time, since it seems they are running pumps simultaneously.. Still awful !

Feb. 4, 2005 - 8:00 A.M. Arms & hands numb! Had retired at 12:30 A.M. -up only after sleeping 1½ hrs.

These people are psychotic! They enjoy making people suffer!

Out on the deck today - ground shakes - especially when leaning on the railing!!

- Feb. 5, 2005 - Air tastes of electrical intensity. Saliva bubbles - bed shakes
- Feb. 6, 2005 - Rather quiet!
- Feb. 7, 2005 - Up at 1:30 A.M. & 6:30 A.M. Face & arms red! This is so very cruel!!
- Feb. 8, 2005 - Vibrations all morning long!! - every chair - feel it through the garage floor
- Feb. 9, 2005 - Less intense, but awakened @ 4:00 A.M. & 6:00 A.M.
- Feb. 10, 2005 - Up @ 3:45 A.M. Air is white; saliva bubbles!  
9:30 A.M. Lots of pounding!
- Feb. 11, 2005 - Awakened @ 1:45 A.M., 5:45 A.M., 6:10 A.M. & 6:30 A.M. - Very loud engine & faster speed - whole house shakes!! Loud crack!

Someone needs to check cracks in foundation. "Air Care" guy said there were some!

- Feb. 13, 2005 - Awakened 1:45 A.M. & 5:45 A.M.
- Feb. 14, 2005 - Up @ 1:40 A.M. Saliva bubbles - Numb arms  
6:40 A.M. VERY Loud! Sounds like a car  
running! Whole bed - whole house shakes  
Vibrations terrible!!  
Pounding sound under the house is terrible.  
House feels like an MRI machine!  
Once again, all of 4 hours of sleep. This  
has gone on for a year!!!
- These hateful people want the property;  
I will not give it to them!!
- Feb. 16, 2005 - Saw people at the pump station. Then -  
a terrible night - Up @ 1:40 A.M., 4:00 A.M.,  
5:00 A.M. , 7:30 A.M.
- Feb. 17, 2005 - Actually slept from 12:30 A.M. - 8:30 A.M.,  
Day to celebrate!!
- Feb 18, 2005 - Up @ 2:00 A.M. & 5:00 A.M.

# STATEMENT

Remit To Charles V. Reed  
 7015 Williams St  
 Allentown PA 18103  
 610 355-1213

No. 849

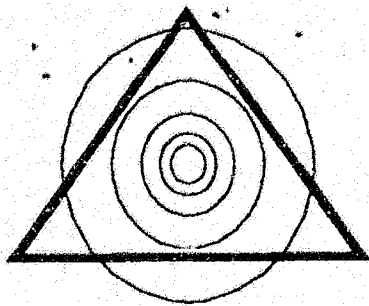
DATE:  
 MAY 26, 2004

TO:  
 LINDA DAVID  
 2922 FAIRVIEW ST,  
 ALLENTOWN PA 18103

AMOUNT REMITTED

DETACH AND MAIL WITH YOUR REMITTANCE. YOUR CANCELLED CHECK IS YOUR RECEIPT.

DATE	DESCRIPTION	CHARGES	CREDITS	BALANCE
SERVICE FEB. 14 2004	PREVIOUS BALANCE ▶			
-	CHECK CONDITION OF ELECTRICAL SYSTEM FOR CAUSES OF ELECTRICAL SENSATION BY OWNER			
-	FOUND SYSTEM IN NORMAL CONDITION			
-	REPLACE OUTLET IN BATH ROOM AND DINING ROOM			
2HR.	LABOR @ \$35 /HR.			\$70.
	MATERIAL			15
	TOTAL			\$85
	PAID IN FULL \$26/04			
	CHECK #4824 @ Charles V Reed			



# TRINITY ASSOCIATES, INC.

P.O. BOX 146, SWARTHMORE, PA. 19081

(610) 544-0496 (800) 982-4359 FAX (610) 544-2016

Engineering Shop, 2210 Walnut Street, Chester, PA. 19013

(610) 876-6428

FAX (610) 876-7178

EMAIL-TRNTYEE@BELLATLANTIC.NET [Http://www.TRINITYASSOC](http://www.TRINITYASSOC)

May 27, 2004

Quotation # Q-2971

Ms Linda David  
2922 West Fairview  
Allentown, PA 18103

Dear Linda:

In the time period since February 18, 2004 when I documented the damage to your home, I have been in correspondence with Mr. Thomas Uff of the South Whitehall Township Water Authority who owns the pumping station as well as Mr. Steven Henning, P.E. of the Pidcock CO who designed the pumping station.

Allowing for the time delays necessary between monthly meetings, normal work requirements, etc. no noteworthy corrective action has been taken to dampen the vibration that could be coming from the pumping station.

In my judgment, the issue has to be resolved by trying to tie the vibration in your home to the vibration coming from the water pumping station. The only way to do this that I am aware of is to make arrangements with Mr. Uff for entry into the pumping station and to make readings there. Then take readings in your home and see whether the graphic amplitude vs frequency spectrum match up at the two locations. Perhaps even starting and stopping the pumps at both locations with monitor attached would contribute to solving the problem.

Our price is \$1400.00 to do such measurements with the instrument described by the attached information. GE previously quoted \$2000.00 and that was before I told them some of the work might have to be done at night, etc.

In my judgment, if linkage is established between the vibration in your home and that radiating from the pumping station, the South Whitehall Township Water Authority/Pidcock Co. should pay for the survey in addition to making alterations to the pumping station similar to those pictured in our 2-18-04 report.

In my judgment, given the real and substantial chance that the pumping station is causing the documented damage to your home, Pidcock/South Whitehall Township Authority should have initiated the study by now and have paid for it to show they are serious about protecting and safeguarding the health of the community. After all, honest mistakes are made particularly if money is saved that keeps everyone's water bill low. But once a problem is identified, then I think the main reason for the Authority to exist is to insure enough resources are available to protect and serve the community in a rapid and honest manner.



Jesse A. Dillon  
Senior Counsel

PPL  
Two North Ninth Street  
Allentown, PA 18101-1179  
Tel 610 774 5013 Fax 610 774 6726  
jadillon@pplweb.com



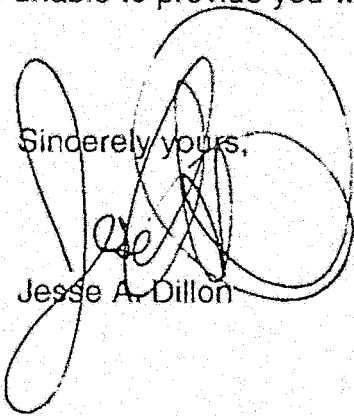
September 27, 2005

Ms. Linda David  
2922 Fairview Street  
Allentown, PA 18103

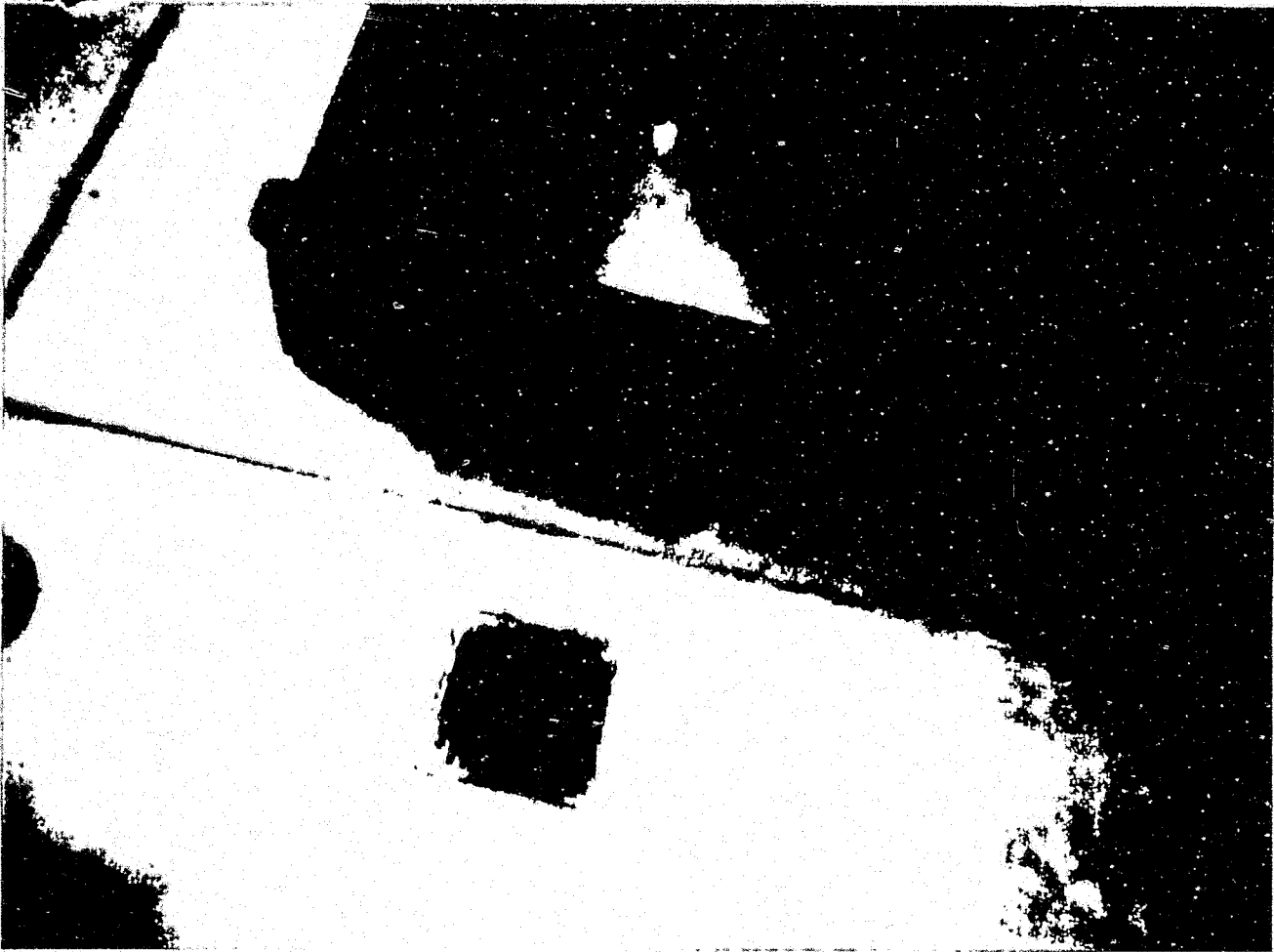
Dear Ms. David,

As requested in your recent voice mail message to me, I am returning your materials. We are sorry that we were unable to provide you with the relief you requested.

Sincerely yours,

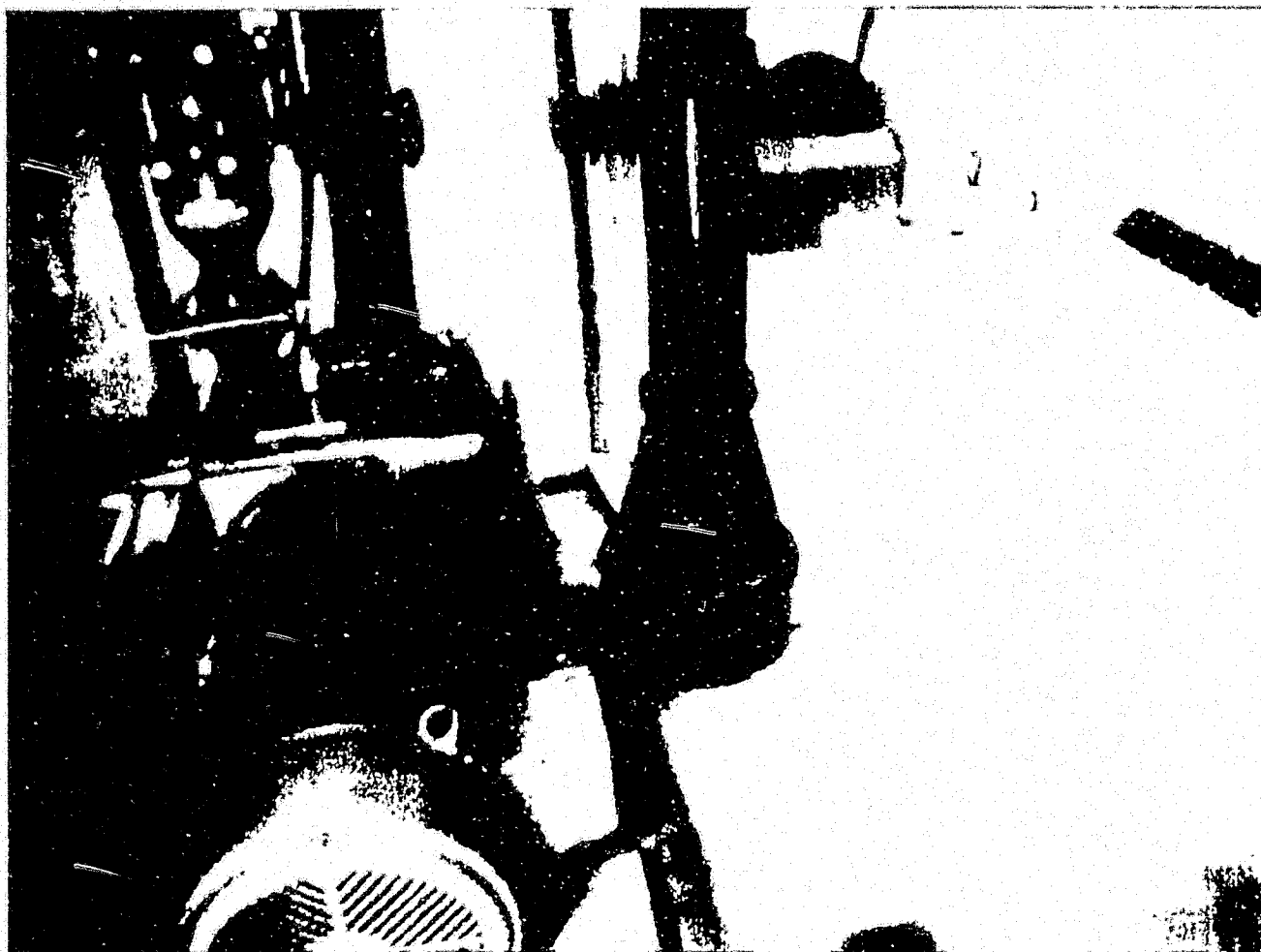
  
Jesse A. Dillon

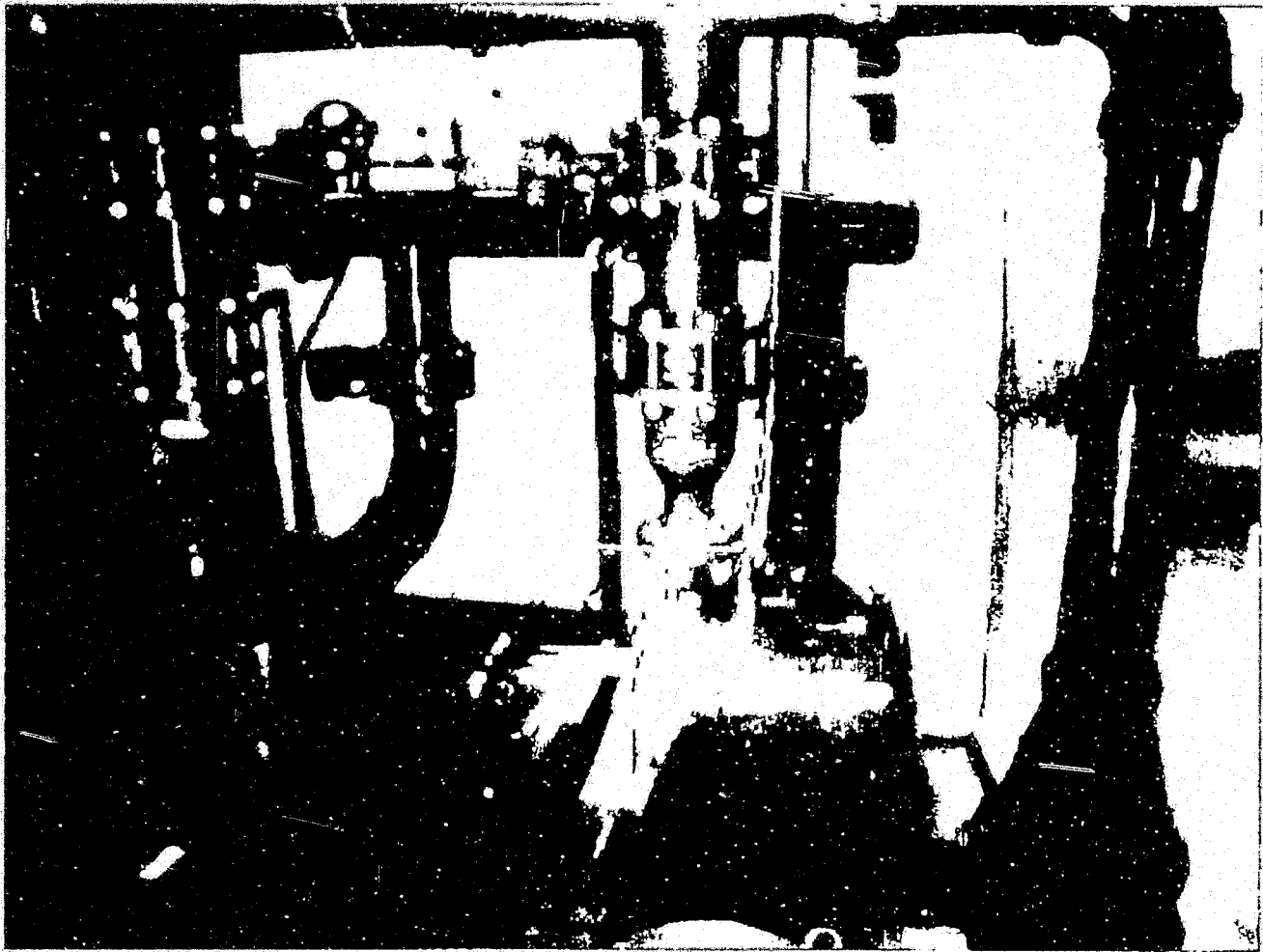
Enclosures



THIS AND THE FOLLOWING THREE PHOTOS  
PREVIOUSLY ARCHIVED IN CASE.







CONCERNING S. WHITEHALL 7/12/05  
PUMP STATION - HAMILTON  
BLVD.

Mr. Lipson,

This was all I  
could get @ the  
County assessment  
office. Called the  
Commissioners. they  
sent me to assessments.

When I called there a  
man in the <sup>(A.M.)</sup>  
background said  
there isn't even a  
building permit on  
file. I went down in  
the A.M. and this is  
what they gave me.  
They say South  
Whitehall is a governing  
→

BUILDING PERMIT RECORD

PIA **543683607536** PARNUM **1**

RECORD OWNER **VA WHITEHALL LLC**  
 PROPERTY ADDRESS **HAMILTON BLVD**

LOW **3110** HIGH

DATE	NUMBER	PRICE	PURPOSE	COMPLETE
04/01/1999	124-99	2,611,090	NEW MEDICAL OFFICE	12/08/1999
05/12/1999	185-99	35,000	FIRE ALARM SYSTEM	12/08/1999
07/07/1999	301-99	296,800	NEW BLDG HVAC	12/08/1999
07/16/1999	325-99	9,650	FIRE LINE	08/25/1999
07/21/1999	331-99	65,000	NEW BLDG SPRINKLER	12/08/1999
07/22/1999	332-99	2,611,090	MEDICAL OFFICE BLDG	12/08/1999
03/08/2000	97-00	6,500	NEW HVAC FOR PUMP STATION	11/22/2000
03/09/2000	105-00	261,000	WATER BOOSTER STATION	11/22/2000
04/05/2000	161-00	0	MOBILE TRAILER	06/12/2000
10/04/2000	572-00	252,000	INT ALTS FOR DENTAL CLINIC	06/05/2001
10/18/2000	605-00	3,000	HVAC WORK	06/05/2001
01/11/2001	31-01	1,000	SPRINKLER SYSTEM	06/05/2001

RECEIVED  
 JUL 13 2005

**BUILDING PERMIT RECORD**

PIN **548683607536** PARNUM **1**

RECORD OWNER **VA WHITEHALL LLC**  
 PROPERTY ADDRESS **HAMILTON BLVD**

LOW **3110** HIGH

DATE	NUMBER	PRICE	PURPOSE	COMPLETE
<b>02/26/2001</b>	<b>109-01</b>	<b>10,000</b>	<b>SMOKING SHELTER</b>	<b>06/05/2001</b>
<b>06/21/2001</b>	<b>311-01</b>	<b>4,070</b>	<b>INSTALL FIRE SUPPRESSION SYSTE</b>	<b>08/07/2001</b>
<b>05/01/2003</b>	<b>154-03</b>	<b>14,742</b>	<b>INT ALTS</b>	<b>10/15/2003</b>
<b>09/02/2004</b>	<b>2004002060</b>	<b>200,000</b>	<b>INT ALTS</b>	<b>06/09/2005</b>
<b>03/28/2005</b>	<b>2004002923</b>	<b>4,000</b>	<b>INT ALTS</b>	<b>06/09/2005</b>

PIN 548663607536 PARNUM

WARD

TILE 465812

DATE 11-Jul-2005

PROP ADDR: HAMILTON BLVD

3110

SALES INFORMATION

SUBDIV.

CURRENT: 5,875,000

ACRES/DIM: 4.6432 ACRES

MON/YR: 05 2005

LOCATION: 19067

LAND USE: 4271

INSTR#: 7264199

UTILITIES: PUBLIC WATER/SEWER

UNITS: 000

PREVIOUS: 890,000

CLASS: COMMERCIAL

ZONING: OC

MON/YR: 05 1998

BK/PG: 1607 0172

COUNTY: LEHIGH

MILLS: .010750

MUNICIPALITY: SOUTH WHITEHALL

MILLS: .004900

SCHOOL DIST: PARKLAND

MILLS: .033860

EXEMPT LAND: 0

EXEMPT BLDG: 0

CURR OWNER: VA WHITEHALL LLC

ADDRESS: 8100 MACOMB ST

TAXABLE LAND: 788,800

TAXABLE BLDG: 3,115,300

GROSSE ILE MI 48138-1574

PREV OWNER: WISE INVESTMENTS INC

TOTAL APPR: 3,904,100

TOTAL ASMT: 1,952,050

TAXABLE ASMT: 1,952,050

COMMERCIAL

PUB7

COUNTY OF LEHIGH  
Office of Assessment

Government Center  
17 South Seventh Street, Room 517  
Allentown, Pennsylvania 18101-2400  
Phone: 610-782-3038  
Fax: 610-820-3380

COMMERCIAL BUILDING INFORMATION FOR VA WHITEHALL LLC

FIN 548683607536 PARNUM 1 CARD# 01 BLDG# 01

OCCUPANCY DESIGN MEDICAL OFFICE

FLOOR AREA 38,333  
NO OF STORIES 1  
YEAR BUILT 2000  
HEATING/COOLING WARM AND COOL AIR (ZONED)  
ELEVATORS NO  
SPRINKLERS YES  
BASEMENT AREA 0  
DISTRICT NAME SOUTH WHITEHALL TOWNSHIP

ADDITIONS

1. BT PAVING
2. COVERED DOCK
3. CANOPIES
4. ISGLASS SHELTER
- 5.
- 6.
- 7.
- 8.
- 9.

PUB7

11-Jul-2005

COUNTY OF LEHIGH  
Office of Assessment

Government Center  
17 South Seventh Street, Room 517  
Allentown, Pennsylvania 18101-2400  
Phone: 610-782-3038  
Fax: 610-820-3380

COMMERCIAL BUILDING INFORMATION FOR VA WHITEHALL LLC

PII: 548683607536 PARNUM 1 CARD# 01 BLDG# 02

OCCUPANCY DESIGN EQUIPMENT SHEL

ADDITIONS

FLOOR AREA 425  
NO. OF STORIES 1  
YEAR BUILT 2000  
HEATING/COOLING  
ELEVATORS NO  
SPRINKLERS NO  
BASEMENT AREA 0  
DISTRICT NAME SOUTH WHITEHALL TOWNSHIP

1.  
2.  
3.  
4.  
5.  
6.  
7.  
8.  
9.

POE7

11-Jul-2005

COUNTY OF LEHIGH  
Office of Assessment

Government Center  
17 South Seventh Street, Room: 517  
Allentown, Pennsylvania 18101-2400  
Phone: 610-782-3038  
Fax: 610-820-3380

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: October 31, 2005

LINDA L. DAVID  
Complainant

VS.

PPL ELECTRIC UTILITIES  
CORPORATION  
Respondent

Complaint Docket  
No: C-20055501

**DOCKETED**

OCT 31 2005

DOCUMENT  
FOLDER

---

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

---

TO: PPL ELECTRIC UTILITIES CORPORATION

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17105-3265, an answer (original and three copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.

James J. McNulty  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P O BOX 3265, HARRISBURG PA 17105-3265

DOCUMENT  
FOLDER

DATE SERVED: October 31, 2005

C-20055501

PPL ELECTRIC UTILITIES CORPORATION  
PAUL E RUSSELL GEN COUNSEL  
TWO N 9TH ST  
ALLENTOWN PA 18101-1179

Dear Sir/Madam:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by LINDA L. DAVID. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

October 31, 2005

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help.

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,

James J. McNulty  
Secretary

ane

MALCOLM J. GROSS  
PAUL A. MCGINLEY  
DONALD LABARRE, JR.  
J. JACKSON EATON, III  
MICHAEL A. HENRY  
PATRICK J. REILLY  
WILLIAM J. FRIES  
ANGIE K. MANLEY  
SUSAN ELIS WILD  
VICTOR F. CAVACINI  
ELIZABETH R. GRAVER  
ROBERT A. ALPERT  
JOHN P. SERVIS  
ALLEN TULLAR  
JOHN F. GROSS  
KIMBERLY G. FRUPKA  
K. A. SPOFFS KIMMEL  
LORGE C. DEANS, JR. \*  
ANDREW H. RALSTON, JR.

\* Also admitted in NY

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Direct number: (610) 871-1324

ORIGINAL

November 21, 2005

RECEIVED

NOV 21 2005

VIA FEDERAL EXPRESS

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

RE: Linda L. David v. PPL Electric Utilities Corporation  
Docket No. C-20055501

DOCUMENT  
FOLDER

Dear Mr. McNulty:

Enclosed for filing in the above-captioned matter are an original and three (3) copies of the Answer of PPL Electric Utilities Corporation as well as Preliminary Motions of PPL Electric Utilities Corporation.

Pursuant to 52 Pa. Code §1.11, the enclosed documents are to be deemed filed on November 21, 2005, which is the date they were deposited with an overnight express delivery service as shown on the delivery receipt attached to the mailing envelope.

In addition, please date and time-stamp the enclosed extra copy of this letter and return it to me in the envelope provided.

Very truly yours,

*John F. Gross*  
JOHN F. GROSS

JFG/jeh

Enclosures

cc, w/ enc: Linda L. David

South Whitehall Township

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City of Allentown  
Diedre L. Bilger

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LINDA L. DAVID,  
Complainant,

v.

PPL ELECTRIC UTILITIES CORPORATION,  
Respondent.

COMPLAINT DOCKET  
NO. C-20055501

RECEIVED

NOV 21 2005

NOTICE TO PLEAD

TO: Linda L. David  
2922 W. Fairview Street  
Allentown, PA 18103

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Pursuant to 52 Pa. Code Section 5.101(d), you are hereby notified that you have ten (10) days from the date of service of the within New Matter in which to answer, and that if you fail to so answer within ten (10) days from the date of service, Respondent's New Matter may be granted without further notice.

Respectfully submitted,

PPL Electric Utilities Corporation

By: John F. Gross  
JOHN F. GROSS

Dated: November 21, 2005  
at Allentown, Pennsylvania

RECEIVED

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

NOV 21 2005

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

LINDA L. DAVID,  
Complainant,

v.

PPL ELECTRIC UTILITIES CORPORATION,  
Respondent.

COMPLAINT DOCKET  
NO. C-20055501

DOCUMENT  
FOLDER

ANSWER WITH NEW MATTER OF PPL ELECTRIC UTILITIES CORPORATION

PPL Electric Utilities Corporation (hereafter "PPL"), by its attorney, hereby answers, with new matter, the Complaint in the above-captioned proceeding as follows:

1. Admitted.
2. Admitted in part. It is admitted that PPL Electric Utilities serves Complainant at her residence at 2922 W. Fairview Street. Complainant additionally lists South Whitehall Township (the "Township") and the Allentown Water Authority (the "Authority") as Respondents to this matter. As set forth more fully in PPL's Preliminary Motions, which are incorporated herein by reference in their entirety, if this matter is to proceed, PPL believes, and therefore avers, that the Township and the Authority should be joined as indispensable parties.
3. Admitted.
4. Denied. By way of further answer, PPL denies that there is any safety or quality problem with respect to Complainant's utility service. PPL is without knowledge or information sufficient to form a belief as to Complainant's concerns related to a pumping station apparently on an adjacent property that is not owned by PPL and over which PPL has no authority or control, therefore all such allegations are denied. By way of further answer, PPL responded to a

DOCKETED  
NOV 23 2005

complaint by Ms. David in June of 2004 and performed electromagnetic field ("EMF") measurements inside and outside Ms. David's residence. PPL also performed a stray voltage study outside Ms. David's residence on June 14, 2004. PPL reported its findings related to both EMF and stray voltage studies to Ms. David but believes that neither the magnetic fields recorded nor the recorded stray voltage are typically causes for concern. Further, PPL denies that any magnetic field or stray voltage discovered at Ms. David's home is a result of any action taken by PPL or the result of any failure by PPL to act.

PPL denies that it has been unreasonable or failed to provide adequate service to the Complainant. PPL denies that it has violated any provision of its Tariff, the Public Utility Code or regulation of the Public Utility Commission.

PPL does not have sufficient information to either admit or deny all other allegations in Complainant's Complaint. Therefore all such allegations are denied.

5. Paragraph 5 constitutes a request for relief to which no response is required. To the extent a further response may be required, PPL incorporates herein by reference, as if set forth fully at length herein, its aforementioned response to paragraph 4 of the Complaint and its Preliminary Motions.

- 6. Admitted.
- 7. Admitted.

DOCUMENT  
FOLDER

NEW MATTER OF PPL ELECTRIC UTILITIES CORPORATION

PPL, by its attorney, hereby raises as a New Matter, pursuant to Section 5.62, Title 52 of the Pennsylvania Code, 52 Pa. Code §5.62, the following:

**DOCKETED**  
NOV 23 2005

8. Paragraphs 1 through 7 of PPL's Answer are incorporated herein by reference as though set forth fully at length.

9. As more fully described in PPL's Preliminary Motions which are incorporated herein by reference, Complainant's Complaint makes no allegations that PPL failed to provide her with reasonable, safe service at her residence or that PPL was unreasonable in providing service to the Complainant at her residence.

10. The Pennsylvania Public Utility Commission has no subject matter jurisdiction to determine property disputes or the type of dispute set forth in Complainant's Complaint.

WHEREFORE, in view of the foregoing, PPL respectfully requests that the Pennsylvania Public Utility Commission deny the above captioned Complaint.

Respectfully submitted,

PPI Electric Utilities Corporation

By: John F. Gross  
JOHN F. GROSS

Dated: November 21, 2005  
at Allentown, Pennsylvania



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LINDA L. DAVID,  
Complainant,

v.

PPL ELECTRIC UTILITIES CORPORATION,  
Respondent.

COMPLAINT DOCKET  
NO. C-20055501

RECEIVED

NOV 21 2005

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CERTIFICATION OF SERVICE

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

I hereby certify that I have this day served a true copy of the foregoing document upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

Linda L. David  
2922 W. Fairview Street  
Allentown, PA 18103

South Whitehall Township  
Municipal Building  
4444 Walbert Ave.  
Allentown, PA 18104

City of Allentown  
435 Hamilton Street  
Allentown, PA 18101

Dated this the 21<sup>st</sup> day of November, 2005

GROSS, MCGINLEY, LABARRE & EATON, LLP

By: John F. Gross  
JOHN F. GROSS, ESQUIRE

ORIGINAL

Linda L. David  
2922 W. Fairview St.  
Allentown, PA 18103  
Nov. 28, 2005

James J. McNulty, Secretary  
PUC Commission  
P.O.Box 3265  
Harrisburg, PA 17105-3265

RE: Linda L. David v. PPL Electric Utilities Corp.  
Docket No. C-20055501

NOV 28 2005

Dear Mr. McNulty,

This letter is in response to the notice sent by Gross, McGinley, LaBarre & Eaton, attorneys for PPL. I filed a complaint because vibrations & electrical impulses coming into my home from a water pumping station 200' away are terrible.

From Jan.-June of 2004, I repeatedly called PPL and South Whitehall Township to inform them that I felt like I was being electrocuted in my own home. PPL said I had to "investigate on my own!" Nobody came to help!!

I finally contacted the EPA in Philadelphia via a friend's computer in Grant's Pass, Oregon! They agreed to visit my home on June 6, 2004. Mr. Dougherty, EPA engineer, found stray voltage from a transformer coming into my home. This had been 6 months of torture. Yes, I feel PPL did not respond as they should have.

PPL came on June 14, 2004 and tested and found no problem. I can assure you, I did not climb a utility pole and correct this on my own!!

Some sort of coil was set up on Hamilton Blvd. between the 6th. of June and June 14, 2004. PPL says they have no knowledge of stray voltage. That is not true.

Although the stray volts have been gathered, I had an electrical engineer do testing here. He found they were running 6 Amps of electricity in the water pipes. He said that violates even commercial code, and they should be fined for that.

We rented a \$10,000 analyzer, and I spent \$1500.00 to determine where vibrations are coming from. Vibration peaks match here and at the pump station door. Al Loch, electrical engineer, hammered ground rods into the rocks under the house in order to divert current. Should anyone have had to do this?

This report was sent to PPL. No Response!! They say they have no knowledge of this. Not true.

I personally spoke to Peter Marsh, Andrea Martino, and Jesse Dillan of PPL. Mr. Dillan said only that there was no basis for a claim.

I do not think I should have had to pay thousands to find out what was wrong on their part. I paid a structural engineer, regular electrician, environmentalist, electrical engineer, and had the heating ducts cleaned -all in an effort to "investigate on my own!"

I wrote a personal letter to PPL - No Response!! and a written comment was sent to "Connect"- a PPL customer service pamphlet - No Response!!

The structural engineer spoke to Steve Henning, engineer for the Pidcock Co., landscape co. who installed the pump station. He said they did not intend to do anything about it.

I tried to get an attorney. One kept my papers for 10 months and then wouldn't take the case. She said, They will say in court that they are not responsible for a poorly built home." Even if I

BTL

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owned a shack, there shouldn't be vibrations and electrical intensity surging into my house.

PPL says they do not own the pump station, so they aren't responsible. They do supply the voltage to run it. And, I believe they know, full well, what is wrong!

Some transformers have been changed and lots of wires have been put up all around the station, but at night, after 11:00 P.M. when 2 large pumps and a chlorine pump are in operation, I am awakened with vibrations surging through the furniture, have a red blotchy face, and arms and hands are numb. During the day, when only one pump is running, vibrations are, then, minimal. Presently, a forensic engineer is studying it all. He said the soil may be conducting currents.

I am trying to save my home. It's all I have. I am trying to get help for what I believe is a dangerous situation. I did go to the Lehigh County Authority and asked if a pump station without sound isolators and full insulation pads would be placed 200' from all the new \$400,000 and \$500,000 homes being built here in our valley? Silence filled the room. So, I said, "Well, I guess we all know the answer to that one!" Then a gentleman said I should sue them for negligence. No environmental lawyer in the area will take the case.

Sincerely,

*Linda L. David*

Linda L. David

Property affected by vibration, mist, odour gained knowledge from the settlement with the Well and Pumping Station

**BRITISH COLUMBIA Expropriation Compensation Board**  
 514 Government Street, Victoria, B.C. V8V 2L7 Phone: 250 387-4321

[Link to Home](#)

January 3, 1999, E.C.B. No. 44/97/164 (66 L.C.R. 57)

Between:	George Fredrick Retz and Mary Genevieve Retz Claimants
And:	The District of Sicamous Respondent
Before:	Sharon I. Walls, Vice Chair
Appearances:	Reinhard Burke, Counsel for the Claimants James Yardeley, Counsel for the Respondent

**Reasons for Decision**

There were two Notices of Motion heard by me in this matter. The claimants, George and Mary Retz applied for an order granting leave to file an amended Form A, an order compelling production of documents and an order compelling the respondent who was examined for discovery, Karen Smith, to answer questions put to her at an examination for discovery. The respondent, the District of Sicamous applied for an order that the proceedings be dismissed on the basis that it is statute barred pursuant to s. 42 of the Expropriation Act, R.S.B.C. 1996, c. 125 ("the Act").

**1. Respondant's application to dismiss the proceedings**

Mr. and Mrs. Retz claim in this proceeding is for injurious affection arising out of the construction and operation of a sewage treatment plant and sewage lagoons by Sicamous on land adjacent to property owned by the Retzs. According to the pleadings no land was taken from the Retzs. Sicamous purchased the adjoining land in February 1995 and commenced construction of the sewage treatment plant again in September 1995. The plant commenced operation in June 1996. The claimants' Form A was filed on October 14, 1997.

The Retzs claim is pursuant to sets on 324 of the Municipal Act, R.S.B.C. 1996, c. 123 and section 41 of the Expropriation Act.

Section 324 of the Municipal Act provides:

324. A Council must make adequate compensation to owners injuriously affected by the exercise of any of its powers, for any damages necessarily resulting from the exercise of those powers beyond any advantage which the claimant may derive from the contemplated work.

Section 41 of the Expropriation Act provides:

41 (3) An owner referred to in subsection (1) who wishes to make a claim for compensation for injurious affection must make his or her claim by applying to the board. And the board must hear the claim and determine:  
 (a) whether the claimant is entitled to compensation, and  
 (b) if entitled to compensation, the amount of the compensation.

Section 42 of the Act provides:

42 (1) A claim for compensation under section 41(3) must be made in writing to the board by the person suffering the damage, with particulars of the claim, within one year after the damage:  
 (a) was sustained or  
 (b) became known to the person.  
 (2) If a claim referred to in subsection (1) is not made in accordance with that subsection, the right to compensation is forever barred.

Mr. Yardeley on behalf of Sicamous filed his own Affidavit with excerpts from the transcripts from his discovery of the Retzs attached as exhibits. The Retzs have applied to amend the Form A providing particulars of the alleged injurious affection including vibrations that caused physical damage to their property, mists from the sewage lagoons that drift over their property, odours and noise. The Retzs described the various problems that arose out of the construction and operation of the sewage treatment plant in the discovery transcripts. The evidence from the discoveries was that they knew that there were cracks in their property from the vibrations during construction by February 1996 and in fact had written a letter of complaint to Sicamous on February 22, 1996 with respect to the cracks in the vibrations. They stated that the smells and mists from the sewage lagoons were noticeable within a short time of the plant commencing operation in June 1996. In other words by June or July 1996. The notice that they were complaining of were also apparent from the summer of 1996.

In addition the Retzs are complaining about the loss in market value of their home as a result of the construction and operation of the sewage treatment plant and the sewage lagoons. It is the District's position that the Retzs knew that the market value was affected in February 1996 because there is reference to the Retzs looking to Sicamous for the loss in value of their home in their letter to Sicamous dated February 22, 1996. The Retzs draft amended Form A quantifies this claim as \$135,000 which is calculated by deducting the price (\$110,000) the Retzs received when they sold the property from a value of \$245,000; that the appraiser gave the property prior to the sewage treatment plant and sewage lagoons being constructed. I do not have any evidence as to when the Retzs sold the property or when the appraiser provided his report, but assume that the house was sold after October 8, 1997, the date that the initial Form A was signed.

Sicamous states that since the Retzs knew there were damages from the vibrations, mists, odours, and noise by no later than June or July 1996, the notification to the board by the filing of the Form A in October 1997 was out of time under section 42 of the Act. With respect to the claim for reduction in market value, Sicamous says that by June or July 1996 the Retzs also knew that the market value of their home was affected. Sicamous sought support for its position in a submission on the interpretation of section 42 of the Act. It says that since section 42 of the Act refers to the claim for compensation being made within one year of the damage becoming known to the person (emphasis added), the section should be interpreted so that there is a distinction between the words "compensation" and "damages". If compensation is the reduction in market value and other losses that are determined at the hearing, then Sicamous submits that the damages which starts the limitation clock running should be the physical action that causes the reduction in market value. Thus, the District's interpretation of section 42 is that the damage that starts the one year limitation period should be construed to mean the physical acts of construction and/or the commencement of operation of the sewage treatment plant which in turn caused the various physical nuisances.

Sicamous relied on the case of *Reeb v. Union Gas Co of Canada Ltd.* (1980), 22 L.C.R. 64 (Oct. 1, C.B.) a case which interprets section 22 of the Ontario Expropriation Act, R.S.O. 1970, c. 154.

22 (1) Subject to subsection 2, a claim for compensation for injurious affection shall be made by the person suffering the damage or loss in writing with particulars of the claim within one year after the damage was sustained or after it became known to him; and, if not so made, the right to compensation is forever barred.

This section is similar but not identical to section 42 of our Act. Reeb involved a partial taking of a dairy farm in which one of the claims, in addition to the market value of the interests taken, was for injurious affection to the remaining land as a result of the taking. The claimant admitted never giving any notice in writing to the authority for injurious affection. The board held that, although there was authority that a board should lean over backwards in order to limit a limitation defence and that any ambiguity in the statutory provision should be interpreted in favour of the claimant, on these facts a delay for some seven years, there had been no compliance with the notice provision and the claim for injurious affection was denied.

The Retzs made both procedural and substantive arguments against the application. They say that section 41 of the Act requires the board to hear the claim and that it ought not to dismiss the claim in summary manner. However, this board in a number of decisions has said that it had the jurisdiction to decide a prior legal question on issues such as entitlement prior to a compensation hearing. See *McPhail's Equipment Co. Ltd. v. Surrey* 1990 44 L.C.R. 173 (B.C. E.C.B.) and *Country Style Holdings Inc. v. British Columbia (Ministry of Transportation and Highways)* 1993 51 L.C.R. 1 (B.C. E.C.B.). In the present circumstances the District's application to have the claim dismissed for being out of time under section 42 of the Act is a prior legal question and it is efficient and expedient that it be answered prior to the parties expending time and resulting expense in a compensation hearing.

The Retzs also submit that the evidence put forward in this application is inadmissible. Evidence was offered through excerpts from the discovery transcript attached as an exhibit to the affidavit of Mr. Yardeley and one letter written by the Retzs to the District of Sicamous, dated February 22, 1996 attached to a Notice to Admit, dated October 6, 1998. The evidence in the discovery transcripts is admissible subject to the right of Mr. Burke, counsel for the Retzs, to put in any additional questions that may be required to fairly establish the context. I do not accept the decision of Edwards J in *Blackwell Stores Ltd. v. Vancouver Irrigation District*, (unreported, B.C.S.C. June 27, 1995) as standing for the proposition that all discoveries must be complete before any part of them can be used as evidence. With respect to the letter attached to the notice to admit, I note that there is reference to the letter and some of its contents in the excerpts of the discovery transcripts dated September 21, 1998 that were attached as exhibits. Both of the Retzs acknowledge sending it. The letter does not appear to have been marked as an exhibit at the discovery. While Rule 31 of the Supreme Court Rule with respect to admissions and in particular Rule 31(6) is not one of the rules that is expressly adopted by the board under paragraph 12 of Expropriation Compensation Board Practice and Procedure Regulation, B.C. Reg. 457/87, the board has frequently adopted other Rules of the Supreme Court where it has been expedient to do so. I am unaware if Notices to Admit have previously been accepted by this board as evidence but in my view the use of the Notice to Admit in this case is a useful way to bring the evidence before the board. Although there was some reference during the hearing to a response being made to the Notice to Admit by Mr. Burke on behalf of the Retzs, for some reason this response was not filed by either party.

Finally the Retzs submit that this application by the District is inconsistent with its pleadings in Form B. In this application the District is asking the board to find that the Retzs knew that they had suffered damages as a result of vibrations, mists, odours and noise and that these things affected the market value of the land more than one year prior to the date that the Form A was filed on October 14, 1997. Paragraph 5 of the Form B denies that the Retzs suffered any damages. The Retzs say that paragraph 4 of the Expropriation Compensation Board Practice and Procedure Regulation applies. This provision requires a respondent to specifically plead a complete denial of the claim and to include any statute and facts on which it relies, failing which it needs leave of the board to raise in argument of the

compensation hearing. The purpose of this provision is to ensure that the claimant has proper notice of any claim by the authority that no compensation is owing and the basis for this denial. In this case as the District pointed out, it has complied with paragraph 4 of the Practice and Procedure Regulation by specifically pleading, in paragraph 7 of the Form B, the limitation defence in section 42 of the Act together with the facts on which this defence was made. It is true in looking at the Form B as a whole, that the District's pleadings probably should have been made in the alternative (see Rule 19(7) & 18); however, I find no objection to the respondent's application as a result of paragraph 4 of the Practice and Procedure Regulation, which I find has no application here.

With respect to the substantive arguments against the application, the Refs referred me to six cases from Ontario and Nova Scotia interpreting section 22 of the Ontario Act and an identically worded section of the Nova Scotia Act. Although in every case there had been some delay in providing written notice with particulars, the statutory limitation period of one year after the damage was sustained either did become known to the person or did not apply because the claimants did not have the necessary knowledge of the damage in the initial stages and only had a true appreciation of the damage at a later stage, typically when an appraisal report about the injurious effect on the market value of the remainder was delivered to the claimants. See *Eddy v. Ministry of Transportation and Communications* (1974), 22 L.C.R. 240 (Ont. L.C.B.), and *9 C.C.P. 103*, (Ont. Div. Ct.), *Calgas Investments Ltd. v. York* (1983), 29 L.C.R. 297, (6 M.R.), *Aguino v. Ministry of the Environment* (1990), 44 L.C.R. 47, (3 M.B.), *Summit Realty Ltd. v. County of Halton* (1990), 44 L.C.R. 120 (N.S.E.C.B.); *R. v. Research Island A.G.* (1994), 52 L.C.R. 268, (M.S.C.A.); and *Snyder v. Minister of Transportation* (1996), 52 L.C.R. 247, (Ont. L.C.B.).

Turning to the present case, section 42 of the Act is somewhat different in wording from section 22 of the Ontario Act and section 31 of the Nova Scotia Act. It is the case that all three sections refer to claims for compensation being made within one year after the damage became known to the claimant. However, section 42 requires a claim to be made to the board, rather than to the respondent authority. It also applies only to claims for injurious affection where no land is taken. Where land is taken, there is a limitation provision in section 25 of the Act which requires a claim for compensation (including injurious affection) to be made within one year after an advance payment is made pursuant to section 20 of the Act. Because section 42 of the Act applies only to cases where no land is taken while the Ontario and Nova Scotia provisions apply most frequently to partial takings, (although they also apply to cases where no land is taken), certain comments by the various courts in Ontario and Nova Scotia as to construing these legislative provisions setting out the limitation period liberally and in favour of the claimant may not apply to analyses of section 42 in British Columbia. See *The Queen v. Tener* (1985), 22 L.C.R. 340 at 361 (S.C.C.) where Madam Justice Wilson states that the general rule in construing legislation in light of a presumption in favour of compensation applies where there is an expropriation of land, but no such presumption applies in the case of injurious affection with no land taken.

The District acknowledges that it has the onus of showing that there has been non-compliance with the limitation provision set out in section 42 of the Act. On the evidence presented in this application, the Refs knew from either the commencement of construction or from the commencement of operation of the facility that their property was affected by vibrations, mist, odours and noise arising from the District's sewage treatment plant. This means that they knew about these problems more than one year before they gave written notice to the board by filing their Form A. Is this sufficient knowledge of the damage to start the limitation period in section 42 running?

The decision in *Calgas Investments Ltd.* is one with some similarities to the present case. It was a partial taking of undeveloped land for a water tower. The respondent authority, the Regional Municipality of York, took the position that the claim for injurious affection was barred under section 22 of the Ontario Act because there was more than a year between the taking and the written notice. The alleged injurious affection was that the water tower structure itself made the remaining land adjacent to it less valuable for development. In addition, the claimant incurred greater costs as a result of the partial taking as it was required to import extra fill during development instead of having available to it the fill which could have been used to provide fillfill, if it had not been taken by the authority. There was evidence from the principal of the claimant, an Italian immigrant who did not read English, as well as from the lawyer, John Coates, and the planner, that they did not know what the injurious effect of the water tower would be on the remaining land until after construction of the tower had commenced or even at some point later than that. The Ontario Municipal Board held that the respondent authority had not satisfied its onus of showing that the claimant had sufficient knowledge of the damage that would flow - let's real apprehension of the damages flowing from the constructor of the water tower - at the time that the partial expropriation occurred and therefore the claim was not statute barred.

In *R. v. Research Island A.G.*, the Nova Scotia Court of Appeal upheld a finding by the Nova Scotia Utility and Review Board that a claim for injurious affection arising out of a partial taking was not barred by section 31 of the *Expropriation Act*, R.S.N.S. 1989, c. 156 (which is identical to section 22 of the Ontario Act). The court reviewed the earlier decisions in *Eddy*, *Calgas Investments Ltd.*, *Summit Realty Ltd.* and *Aguino* and held that the claimant "did not know the effect of the injurious affection on the market value" of the remaining property until the claimant's appraiser's report was delivered. *Freem v. A.* speaking for the court states at p. 272:

An owner who receives notice of expropriation may become aware immediately that his or her remaining lands are worth less, but that said realization is not the knowledge necessary to support a claim in which particulars must be stated.

Often the requisite knowledge is only obtained with professional advice. In *Summit Realty* the Nova Scotia Expropriations Compensation Board stated at p. 127

that the principal of the claimant, a senior citizen and a lay person, was in no position to do anything other than speculate about loss or damage flowing from expropriation; there is no doubt that the principal of the claimant required professional advice. In *Calgas* the board was obviously of the view that the section required a high order of knowledge and not a suspicion or an uninformal guess. *Calgas* suggests that an element of certainty must be present. This board agrees with this approach and on the facts of this case is satisfied that the claimant did not know of loss or damage until the date of the transmission of [its appraiser's] report.

In only one case, *Aguino v. Ministry of the Environment*, was there a claim for injurious affection in which no land was taken from the claimants. It was a claim for injurious affection for settlement to the claimants' lot when a well and a pumping station were constructed on adjacent land. The claim was brought eight or nine years after construction of the pumping station and more than one year after the owners had knowledge of the settlement. However, it was brought within one year of the claimants gaining knowledge that the settlement was caused by the well and the pumping station. The Ontario Municipal Board said that section 22 did not bar the claim because the limitation did not commence to run until the claimants had both knowledge of the damage and the cause of the damage.

It is true that in *Reeb* that the Ontario Land Compensation Board refused a claim for injurious affection of an expropriation and an easement for a gas pipe line on a dairy farm when no written notice with particulars of the claim had been made for some seven years. The alleged injurious affection was caused by valve machinery protruding above the ground, an increase in the height of the land taken, as a claim for fence. These damages were primarily visual although there was also evidence that the claimant farmer could not cultivate up to the lot line. The highest and best use of the property was continuing use as a dairy farm. The board did not analyse the degree of knowledge of the claimant and when this knowledge was acquired. It apparently assumed the claimant had sufficient knowledge of the damages giving rise to the injurious affection as soon as the construction of the pipeline had been completed and the analysis and quantification of this effect by an appraiser was unnecessary.

I prefer the reasoning in *Eddy*, *Calgas*, *Aguino*, *Summit Realty*, and *R. v. Research Island A.G.* Applying that reasoning to the present case, I consider that the claimants' information that there were smelks and noises affecting their property, and even a probability that the market value would be affected by these smelks and noises, does not constitute a real apprehension of the effect of these nuisances on the market value. Meaningful knowledge necessary to support a claim in which particulars of a decrease in market value must be stated occurred at some later stage, perhaps when the appraiser provided his report or when the claimants sold their property. Therefore on the evidence before me at this time, the District has not met the onus of proving that the claimants had meaningful knowledge of the loss in market value of their property as a result of the injurious affection from the sewage treatment facility prior to October 14, 1996. Since it is possible that further relevant evidence may arise during the compensation hearing, following the Ontario Divisional Court in *Snyder*, I am not denying the District's right to raise this argument again. It may be that there are claims for more than one type of injurious affection - each of which may have to be considered separately or this issue.

**2. Claimants' application to file an amended statement of claim and compel discovery**

**2.1 Amended Statement of Claim**

The Refs applied for an order granting leave to file an amended Statement of Claim with further particulars of the claim. The original Form A was filed on October 14, 1997. An Application to Set Hearing Date was filed by the claimants on March 30, 1998 specifying the week of December 6, 1998 as the dates for the hearing. The Notice of Hearing issued by the board was dated October 6, 1998. The claimants sent an amended Form A to the board with a cover letter dated September 23, 1998 requesting that the amended Form A be filed, because the matter had already been set down for a hearing on March 30, 1998, the amended Form A was not accepted by the Registrar of the board for filing without the consent of the respondent.

The practice of the board requiring consent or leave to file amended pleadings after a hearing date has been set down by filing an Application to Set Hearing Date has been derived from Rule 24(1) of the Supreme Court Rules. The purpose of the rule is not to prevent amendments but to attempt to achieve fairness to all parties when amendments are proposed after a trial or hearing date has already been scheduled. A party other than the one seeking the amendment can either consent to the amendment, (on the grounds that the board will almost certainly grant the amendment in any event) or put its arguments to the board as to how the proposed amendment or the proposed amendment at this time is particularly prejudicial. While Rule 24(1) is not specifically incorporated in paragraph 12 of the Expropriation Compensation Board Practice and Procedures Regulation, as stated above, this board has frequently looked to other Supreme Court Rules for assistance in procedural matters.

The District was not able to identify any particular prejudice arising from the proposed Amended Statement of Claim and in fact appears to have conducted its examination for discovery of the Refs on a basis of proposed amendments to the pleadings. It also conceded that the total claim in the amended Statement of Claim had been reduced because the Refs have now sold their property and crystallized their alleged damage claim.

Although the Notice of Motion set out that an order was being sought granting leave to file an amended Form A, Mr. Burke, on behalf of the Refs, submitted that under the Act claimants who filed a claim should be able to file an amended claim as of right without consent of the respondent authority or leave of the board. He relied on the case of *Re Colwell*, [1937] O.R. 559 (Ont. C.A.) in which a trustee in bankruptcy refused an amended claim from a creditor on the basis that he had no jurisdiction to accept an amended claim. The Court of Appeal stated that the statutory right to make a claim must imply the right to make an amended claim, even where the legislative provision did not specifically say so. In the alternative, Mr. Burke sought leave to file an amended Form A.

I do not think that *Re Colwell* is of assistance in this case. This board like all administrative tribunals is master of its own procedure. The incorporation of Rule 24(1) is a procedural safeguard to ensure fairness to both parties when one party seeks an amendment to its pleading after a hearing date is already scheduled. After hearing submissions the board has jurisdiction to grant leave or to grant leave on terms to a party to amend its pleadings.

The Refs are given leave to file the Amended Form A. I would note that I do not see any basis in this case for the respondent District to have refused its consent to file the amended Form A. I would also note that under Rule 24(6) the respondent has the ability to file an amended Reply in answer to the amended Form A.

**2.2 Further Discovery**

Finally, the Refs applied for an order for production of specified documents and for an order requiring Karen Smith, the representative of the District who was examined on discovery to answer outstanding questions. However, the majority of the documents and questions were produced or answered prior to the hearing. The only outstanding questions were to do with the financial records of the District relating to the operation of the sewage treatment plant. The claimants submitted that these records may be relevant by indicating whether the District encouraged use of the sewage treatment plant outside the District's boundaries by the use of competitive tariffs.

The District's response was that they had supplied figures relating to the amount of use of the facility, the number of truckloads that had delivered material and the volume of material that had been transported. It was their position that the District's financial records were irrelevant to the claimants' case.

The test for relevance as set out in *Compagnie Financiere et Commerciale du Pacifique v. The Peruvian Guano Co.* (1882), 12 Q.B.D. 55 (C.A.) is very wide. At p. 63 Brett L.J. states:

It seems to me that every document relates to the matters in question... which, it is reasonable to suppose, contains information which may - not which must - either directly or indirectly enable the party requiring the [disclosure] to advance his own case or to damage the case of his adversary.

This test was discussed in detail by this board in *Bayview Builders Supply (1972) Ltd. v. MATH* (1994), 52 L.C.R. 191. On the other hand, there are limits imposed by the courts. Where there are thousands of documents of only possible relevance, it has been held unreasonable to order their discovery. See *Peter KKWit Sons Co. of Canada Ltd. v. B.C. Hydro and Power Authority* (1982), 36 B.C.L. 58 (S.C.).

In this case, I accept the Petitioner's submission that there is some chance that information about the various charges may be of some relevance. I order that Q 167 on the examination for discovery with respect to the charges for houseboats be answered. I also order that other questions relating to the amount of charges by various users be answered. However, the financial records relating to the facility are presumably numerous and of only possible relevance. On the evidence before me, I refuse the order for production of all of the District's financial records relating to the facility.

### 3. Costs

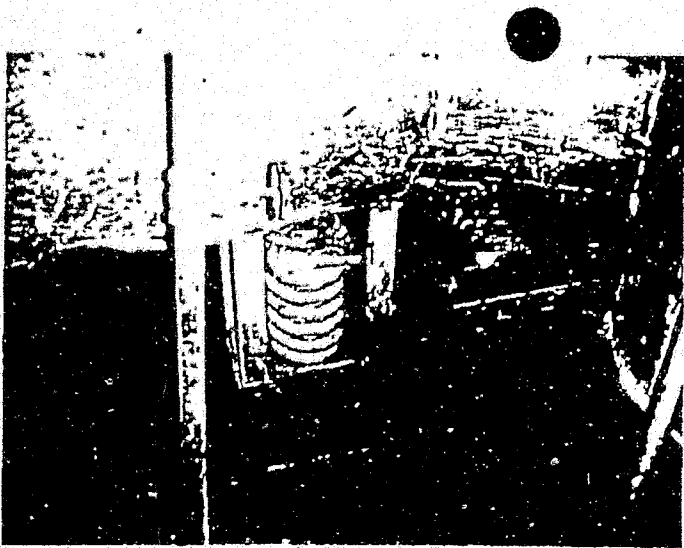
Each party sought costs of their application.

The respondent was not successful in its application to have the proceeding dismissed on the basis of a limitation defence. The claimants are entitled to their costs for defending this application.

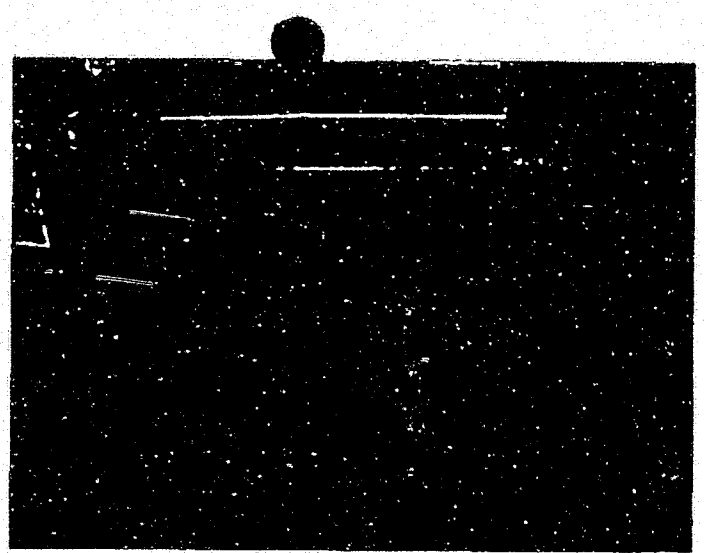
With respect to the claimants' application, I do not see any basis in this case for the respondent District to have refused its consent to file the amended Form A. The claimants have also had some success on their application for further discovery. The claimants are therefore entitled to their reasonable legal costs for their application.

125

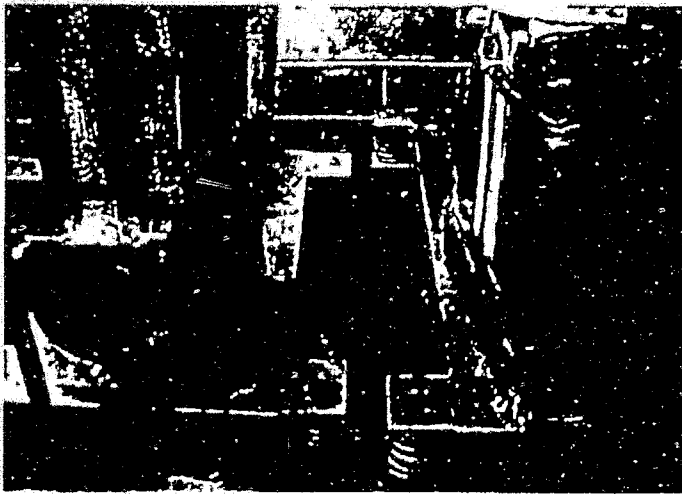
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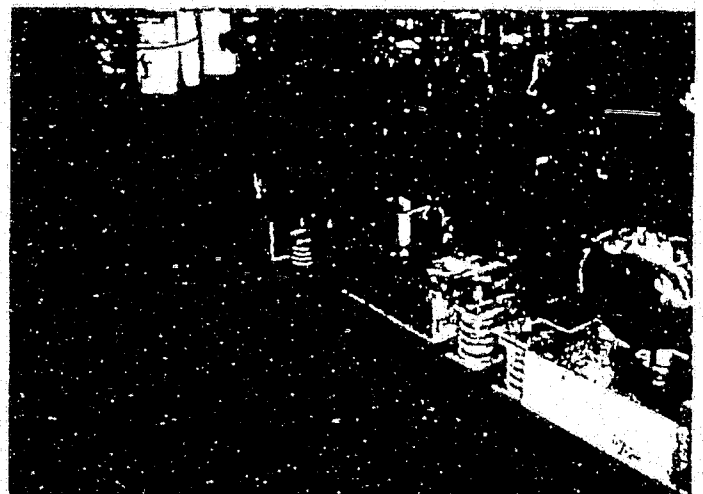
Normally such sound isolation devices are installed on pumps located near houses



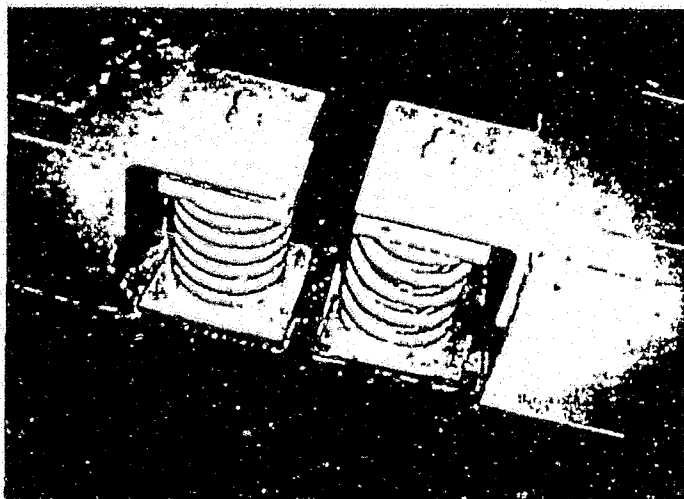
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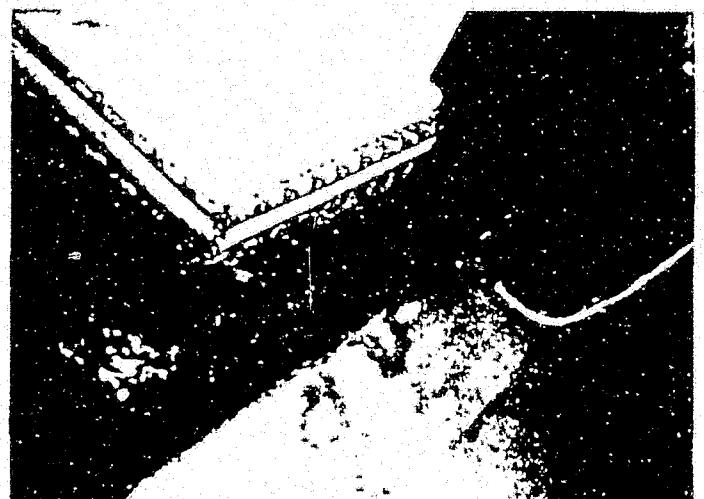
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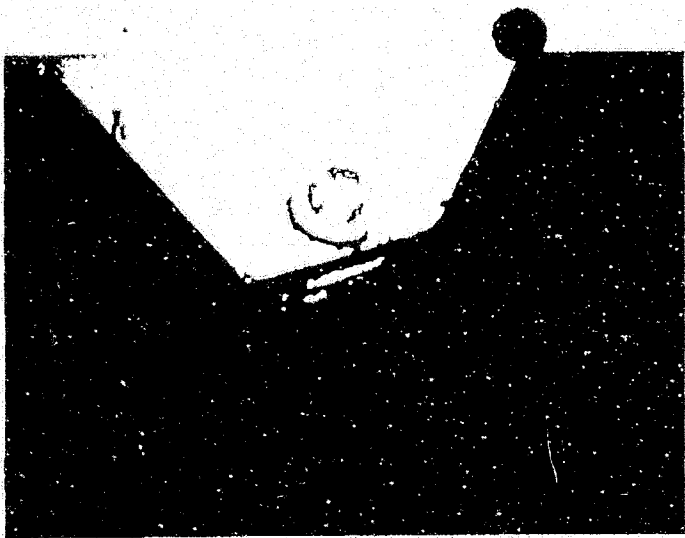
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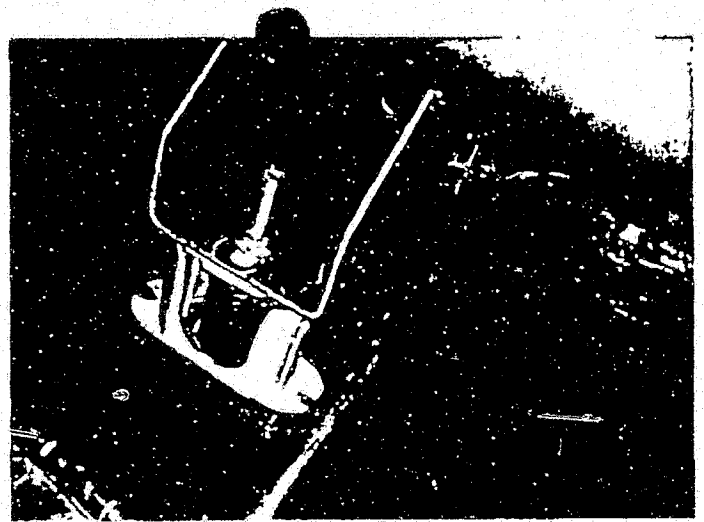
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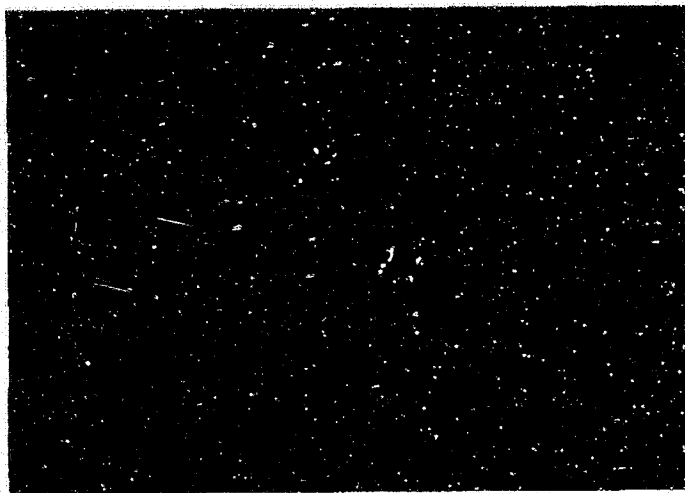
Normally such sound isolation devices are installed on pumps located near houses



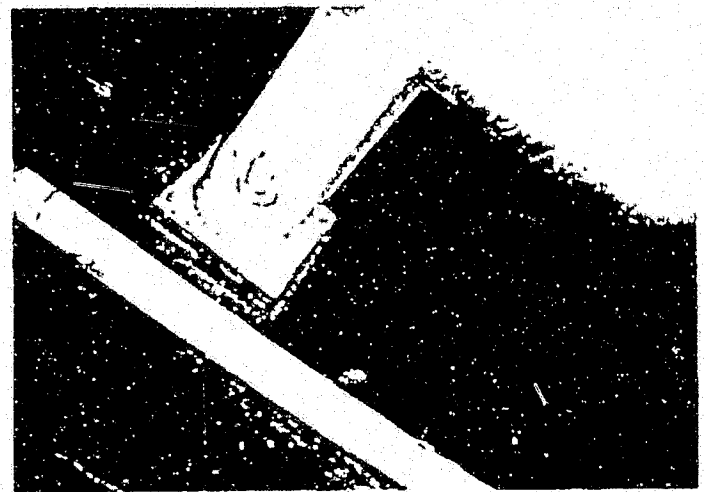
Normally such sound isolation devices are installed on pumps located near houses



Normally such sound isolation devices are installed on pumps located near houses



Normally such sound isolation devices are installed on pumps located near houses



Normally such sound isolation devices are installed on pumps located near houses



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
Administrative Law Judge  
P.O. BOX 3265, HARRISBURG, PA 17105-3265  
November 29, 2005

IN REPLY PLEASE  
REFER TO OUR FILE

Re: C-20055501

(SEE ATTACHED LIST)

Linda L. David v. PPL Electric Utilities Corp

Motion Judge Assignment Notice

This is to inform you that a preliminary motion was filed on the above-captioned case. This motion is being assigned to Chief Administrative Law Judge Veronica A. Smith for ruling. The Commission rule of practice at 52 Pa. Code §5.101 specifies that the person who filed the complaint has ten (10) days from the date the motion was served on you to file an answer.

If you file any pleading or document relating to this motion with the Secretary of the Commission, please provide a duplicate copy to the judge.

Procedural questions or comments should be directed to the judge at:

717-783-5452

pc: SA Lopez-Goldberg  
Cherie Pyle, Scheduling Officer  
Beth Plantz  
Docket Section

**DOCUMENT  
FOLDER**

**DOCKETED**  
DEC 15 2005

RECEIVED

2005 DEC 12 PH 4:02

Anthony D. Kanagy  
Direct Dial: 717-612-6034  
akanagy@postschell.com

December 12, 2005

PA PIC  
SECRETARY'S BUREAU

VIA HAND DELIVERY

James J. McNulty  
Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
PO Box 3265  
Harrisburg, PA 17105-3265

ORIGINAL

PENNSYLVANIA

PHILADELPHIA

PITTSBURGH

HARRISBURG

LANCASTER

ALLEN OWEN

NEW JERSEY

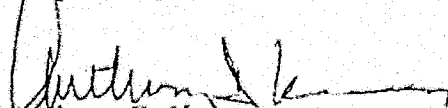
PRINCETON

RE: Linda L. David v. PPL Electric Utilities Corporation  
Docket No. C-20055501

Dear Secretary McNulty:

Enclosed, for filing, are an original and three (3) copies of the Praecipe to Withdraw Appearance of John F. Gross and Praecipe for Appearance of Anthony D. Kanagy in the above-referenced proceeding. As indicated on the enclosed certificate of service, a copy has been served on the Complainant.

Respectfully submitted,

  
Anthony D. Kanagy

DOCUMENT  
FOLDER

ADK/jl

Enclosures

cc: Honorable Veronica A. Smith  
John F. Gross, Esquire

3

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LINDA L. DAVID,  
Complainant,

v.

PPL ELECTRIC UTILITIES CORPORATION,  
Respondent.

COMPLAINANT DOCKET  
NO. C-20055501

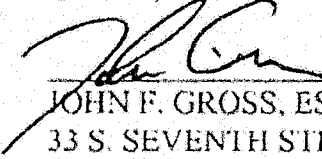
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PRAECIPE TO WITHDRAW APPEARANCE

TO: JAMES J. MCNULTY:

Kindly withdraw my appearance for PPL ELECTRIC UTILITIES CORPORATION in the above case.

GROSS, MCGINLEY, LABARRE & EATON, LLP



JOHN F. GROSS, ESQUIRE, ID #82079  
33 S. SEVENTH STREET, P.O. BOX 4060  
ALLENTOWN, PA 18105-4060  
(610) 820-5450

Date: 12/7/2005

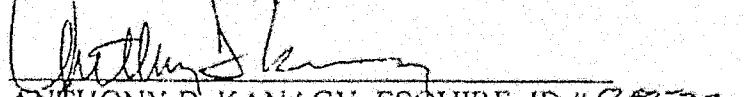
PRAECIPE FOR APPEARANCE

DOCKETED  
JAN 18 2006

TO: JAMES J. MCNULTY:

Kindly enter my appearance for PPL ELECTRIC UTILITIES CORPORATION in the above case.

POST & SCHELL, P.C.



ANTHONY D. KANAGY, ESQUIRE, ID # 35522  
17 NORTH SECOND STREET, 12<sup>TH</sup> FLOOR  
HARRISBURG, PA 17101-1601  
(717) 612-6034

Date: 12/12/2005

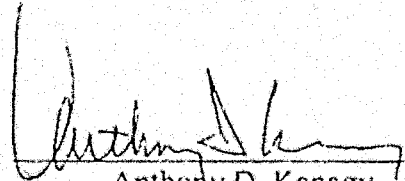
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

**VIA FIRST CLASS MAIL**

Linda L. David  
2922 West Fairview Street  
Allentown, PA 18103

Date: December 12, 2005

  
\_\_\_\_\_  
Anthony D. Kanagy

SECRETARY'S BUREAU  
PA 100

2005 DEC 12 PM 4:03

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COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P. O. BOX 3265, HARRISBURG PA 17105-3265

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REFER TO OUR FILE  
Secretary  
717-772-7777

December 30, 2005

C-20055501

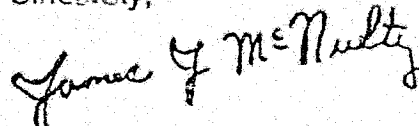
SOUTH WHITEHALL TOWNSHIP  
4444 WALBERT AVENUE  
ALLENTOWN PA 18104

DOCUMENT  
FOLDER

Dear Sir or Madam:

Enclosed is a copy of the Notice of Complaint, Formal Complaint, and all other pleadings filed at C-20055501. It is being served to you pursuant to the direction of Astrid Lopez-Goldberg, Office of Administrative Law Judge. An answer to the complaint is due on or before January 19, 2006.

Sincerely,



James J. McNulty  
Secretary

cc: Chief ALJ Veronica Smith-letter only  
PPL-letter only  
Linda L. David-letter only

JJM:ksb

Enclosures

**DOCKETED**  
JAN 12 2006



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
Office of Administrative Law Judge  
P. O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY,  
PLEASE  
REFER TO  
OUR FILE.

January 30, 2006

DOCUMENT  
FOLDER

City of Allentown Water Authority  
435 Hamilton Street  
Allentown, PA 18104

Re: Linda L. David v. PPL Electric Utilities Corporation  
PUC Docket No. C-20055501

Dear Sir or Madam:

On December 30, 2005, the Secretary of the Pennsylvania Public Utility Commission (Commission) sent you a letter with attachments regarding the above referenced case. In the letter it inadvertently stated that an answer to the complaint was due on or before January 19, 2006. The letter should have stated that an answer to the motion to join an indispensable party was due. Because of this mistake, the time period is being extended for receipt of an answer to the motion filed by PPL Electric Utilities Corporation. An answer to the motion is now due on or before February 14, 2006.

Sincerely,

Astrid E. Lopez-Goldberg  
Counsel/Special Agent  
Office of Administrative Law Judge

Pc: Linda L. David  
PPL Electric Utilities Corporation  
Eric Rohrbaugh  
OALJ Scheduling Staff  
Commission File

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COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
Office of Administrative Law Judge  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY,  
PLEASE  
REFER TO  
OUR FILE.

January 30, 2006

DOCUMENT  
FOLDER

South Whitehall Township  
444 Walbert Avenue  
Allentown, PA 18104

Re: Linda L. David v. PPL Electric Utilities Corporation  
PUC Docket No. C-20055501

Dear Sir or Madam:

On December 30, 2005, the Secretary of the Pennsylvania Public Utility Commission (Commission) sent you a letter with attachments regarding the above referenced case. In the letter it inadvertently stated that an answer to the complaint was due on or before January 19, 2006. The letter should have stated that an answer to the motion to join an indispensable party was due. Because of this mistake, the time period is being extended for receipt of an answer to the motion filed by PPL Electric Utilities Corporation. An answer to the motion is now due on or before February 14, 2006.

Sincerely,

Astrid E. Lopez-Goldberg  
Counsel/Special Agent  
Office of Administrative Law Judge

Pc: Linda L. David  
PPL Electric Utilities Corporation  
Eric Rohrbaugh  
OALJ Scheduling Staff  
Commission File

BTL

2922 W. Fairview St.  
Allentown PA 18103  
Feb. 6, 2006

RECEIVED

Astrid E. Lopez-Goldberg  
Counsel/Special Agent  
Administrative Law Judge

FEB 10 2006  
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Re: PUC Docket No. C-20055501

To Whom It May Concern,

This is a reply to the letter of 12/30/05 regarding my complaint against PPL Corp. I did not reply before, as I thought the township and water authority were to respond.

PPL believes they are not solely responsible for the pumping station problem; I do agree. South Whitehall Township and their engineers, the Pidcock Co. and the Allentown Water Authority are all a part of this. They all should have known pumps with no insulation pads underneath would be a problem. Allentown connected to South Whitehall at some point.

~~the~~ Springs, clamps, and other devices to minimize vibrations are clearly absent from the photo of the pump station. Engineers, with appropriate licenses behind their names, would surely know the results of such a design! I am only guessing, but could it have been done on purpose to force people out of their homes to annex property (cheaply) to make a parking lot for the township and Veteran's Clinic? They already use a church lot for parking. It's only speculation, but makes sense to me. Otherwise, why would they put a pump station 200 feet from private homes without taking measures to be sure houses aren't damaged?

My complaint against PPL was filed because they were responsible for stray voltage which I endured in my home from Jan to June of 2004. They would not come or do anything after repeated calls to them and to the township. Only after the EPA from Philadelphia found the stray voltage was anything done. They almost killed me, I believe. And, since it was happening to only one person they didn't care. The PPL profits just posted in the newspa-

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DOCKETED  
FEB 13 2006