

1803 Philadelphia St.
Indiana, PA 15701
P: (724) 463-7EST
F: (724) 465-4209
PADEP: 32-00382

1276 Bentleyville Rd.
Van Vleet, PA 15366
P: (724) 258-TEST
F: (724) 258-8376
PADEP: 63-04247

1200 River Avenue
Williamsport, PA 17701
P: (570) 323-9002
F: (570) 321-1957
PADEP: 41-04860

04 September 2014

Work Order: 4082596

Project: Wastewater

Tri-County Joint Municipal Authority
Attn: Accounts Payable
P.O. Box 758
Fredericktown, PA 15333

Report of Analysis

Client Sample ID	Lab Sample ID	Matrix	Date Sampled	Date Received
Upper Port	4082596-01	Waste Water	08/22/2014 16:00	08/22/2014 19:40
Middle Port	4082596-02	Waste Water	08/22/2014 16:00	08/22/2014 19:40

Report Narrative

The results contained in this report are only representative of the samples received. Environmental Service Laboratories, Inc. is not responsible for use or interpretation of the data included herein.

Definitions

ND Less than reporting limit
RL Reporting Limit
CFU Colony Forming Units

Certifications

Analyses performed by Environmental Service Laboratories, Inc., Indiana PA, unless otherwise specified.
Environmental Service Laboratories, Inc., Indiana, PA/TNI Certification #32-00382

Approved By

Tricia Leiko For Angela Chapman
Vice President of Operations





1803 Philadelphia St.
Indiana, PA 15701
P: (724) 453-TEST
F: (724) 468-4209
PADEP: 32-08352

1275 Bentleyville Rd.
Van Voorhis, PA 15365
P: (724) 258-TEST
F: (724) 258-8376
PADEP: 63-04247

1200 River Avenue
Williamsport, PA 17701
P: (570) 321-9002
F: (570) 321-1957
PADEP: 41-04880

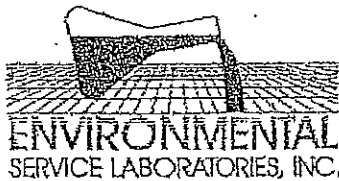
Tri-County Joint Municipal Authority
P.O. Box 758
Fredericktown, PA 15333

Reported: 09/04/2014 16:05

Lab Sample ID#: 4082596-01
Sample Type: Wastewater
Sample Source: Grab
Sampler: Robert Mangis
Client Sample ID: Upper Port

Sample Date: 08/22/2014 16:00
Receipt Date: 08/22/2014 19:40

Analyte	Sample Result	Units	Data Qualifier	RL	Method	Analyst/Certification	Analysis Date/Time
Field Analysis							
Chlorine, Total	0.040	mg/L			SM4500-Cl G-00	RM	08/22/14 16:00
pH	6.59	S.U.			SM4500-HB-00	RM	08/22/14 16:00
General Chemistry							
Total Suspended Solids	51	mg/L		5	SM2540 D-97	ZTR	08/29/14 09:30
Total Metals							
Aluminum	0.497	mg/L		0.010	EPA200.7 4,4	RAE	08/29/14 13:45
Iron	0.121	mg/L		0.020	EPA200.7 4,4	RAE	08/29/14 13:45
Manganese	0.101	mg/L		0.005	EPA200.7 4,4	RAE	08/29/14 13:45



1603 Philadelphia St.
Indiana, PA 15701
P: (724) 463-7EST
F: (724) 465-4209
PADEP: 52-00382

1276 Bentleyville Rd.
Van Voorhis, PA 15356
P: (724) 258-TEST
F: (724) 258-8376
PADEP: 63-04247

1260 River Avenue
Williamsport, PA 17701
P: (570) 321-9002
F: (570) 321-1957
PADEP: 41-04880

Tri-County Joint Municipal Authority
P.O. Box 758
Fredericktown, PA 15333

Reported: 09/04/2014 16:05

Lab Sample ID#: 4082596-02
Sample Type: Waste Water
Sample Source: Grab
Sampler: Robert Mangis
Client Sample ID: Middle Port

Sample Date: 08/22/2014 16:00
Receipt Date: 08/22/2014 19:40

Analyte	Sample Result	Units	Data Qualifier	RL	Method	Analyst/Certification	Analysis Date/Time
Field Analysis							
Chlorine, Total	0.200	mg/L			SM4500-Cl G-00	RM	08/22/14 16:00
pH	6.42	S.U.			SM4500-HB-00	RM	08/22/14 16:00
General Chemistry							
Total Suspended Solids	29	mg/L		5	SM2540 D-97	ZTR	08/29/14 09:30
Total Metals							
Aluminum	0.342	mg/L		0.010	EPA200.7 4.4	RAE	08/29/14 13:47
Iron	0.065	mg/L		0.020	EPA200.7 4.4	RAE	08/29/14 13:47
Manganese	0.099	mg/L		0.005	EPA200.7 4.4	RAE	08/29/14 13:47



1803 Philadelphia St.
Indiana, PA 15701
P: (724) 463-1157
F: (724) 465-4209
PADEP: 32-00982

1276 Bentleyville Rd.
Van Voorhis, PA 15366
P: (724) 258-1157
F: (724) 258-8376
PADEP: 53-04247

1200 River Avenue
Williamsport, PA 17701
P: (570) 321-9002
F: (570) 321-1957
PADEP: 41-04880

28 August 2014

Work Order: 4082593
Project: Drinking Water

Tri-County Joint Municipal Authority
Attn: Jeff Kovach
26 Monongahela Street
Millsboro, PA 15348

Report of Analysis

Client Sample ID	Lab Sample ID	Matrix	Date Sampled	Date Received
Centerville Boro.	4082593-01	Drinking Water	08/22/2014 14:38	08/22/2014 16:45
Joes Flower Shop	4082593-02	Drinking Water	08/22/2014 14:55	08/22/2014 16:45
Sweeties Cinnamon House	4082593-03	Drinking Water	08/22/2014 15:04	08/22/2014 16:45
Dave Carnahan	4082593-04	Drinking Water	08/22/2014 15:30	08/22/2014 16:45
Millsboro Lumber Co.	4082593-05	Drinking Water	08/22/2014 15:40	08/22/2014 16:45

Report Narrative

The results contained in this report are only representative of the samples received. Environmental Service Laboratories, Inc. is not responsible for use or interpretation of the data included herein.

Definitions

ND Less than reporting limit
RL Reporting Limit
CFU Colony Forming Units

Certifications

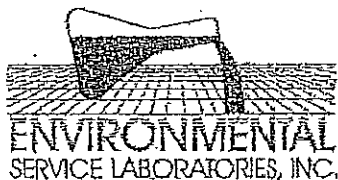
Analyses performed by Environmental Service Laboratories, Inc., Indiana PA unless otherwise specified.
SE-Environmental Service Laboratories, Inc.-Southern Division, PA DEP lab ID #63-04247

Approved By

Angela Chapman

Angela Chapman
Vice President of Operations





1803 Philadelphia St.
Indiana, PA 15701
P: (724) 463-TEST
F: (724) 463-4209
PADEP: 32-00382

1275 Bentleyville Rd.
Van Voorde, PA 15366
P: (724) 258-TEST
F: (724) 258-8376
PADEP: 63-04247

1200 River Avenue
Williamsport, PA 17701
P: (570) 321-9002
F: (570) 321-1957
PADEP: 41-04880

Tri-County Joint Municipal Authority
26 Monongahela Street
Millsboro, PA 15348

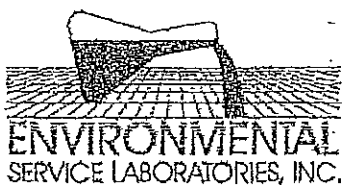
Reported: 08/28/2014 14:28

Lab Sample ID#: 4082593-01
Sample Type: Drinking Water
Sample Source: Grab
Sampler: Robert Mangis
Client Sample ID: Centerville Boro

Sample Date: 08/22/2014 14:38
Receipt Date: 08/22/2014 16:45

Analyte	Sample Result	Units	Data Qualifier	RL	Method	Analysis/Certification	Analysis Date/Time
Field Analysis							
Chlorine, Total	1.36	mg/L			SM4500-Cl G-00	RM	08/22/14 14:38
Microbiology							
Total Coliform	Absent	per 100 mL		1	SM9223 B-04	LMP/S	08/24/14 08:00
E. Coli	Absent	per 100 mL		1	SM9223 B-04	LMP/S	08/24/14 08:00
<i>Above analysis prepared on 08/23/14 08:00</i>							

This sample MEETS current EPA and DEP bacteriological standards of no detectable coliform bacteria per 100 mL sample.



1803 Philadelphia St.
Indiana, PA 15701
P: (724) 463-7157
F: (724) 463-4209
PADEP: 32-00382

1276 Bentleyville Rd.
Van Voorhis, PA 15366
P: (724) 258-7557
F: (724) 258-8376
PADEP: 63-04247

1209 River Avenue
Williamsport, PA 17701
P: (570) 321-9002
F: (570) 321-1957
PADEP: 41-04880

Tri-County Joint Municipal Authority
26 Monongahela Street
Millsboro, PA 15348

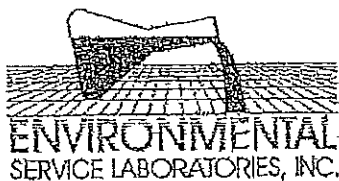
Reported: 08/28/2014 14:28

Lab Sample ID#: 4082593-02
Sample Type: Drinking Water
Sample Source: Grab
Sampler: Robert Mangis
Client Sample ID: Joas Flower Shop

Sample Date: 08/22/2014 14:55
Receipt Date: 08/22/2014 16:45

Analyte	Sample Result	Units	Data Qualifier	RL	Method	Analyst Certification	Analysis Date/Time
Field Analysis							
Chlorine, Total	0.480	mg/L			SM4500-Cl G-00	RM	08/22/14 14:55
Microbiology							
Total Coliform	Absent	per 100 mL		1	SM9223 B-04	LMP/S	08/24/14 08:00
E. Coli	Absent	per 100 mL		1	SM9223 B-04	LMP/S	08/24/14 08:00
<i>Above analysis prepared on 08/23/14 08:00</i>							

This sample MEETS current EPA and DEP bacteriological standards of no detectable coliform bacteria per 100 mL sample.



1803 Philadelphia St.
Indiana, PA 15701
P: (724) 468-7857
F: (724) 468-4209
PADEP: 32-00382

1276 Bentleyville Rd.
Van Voorhis, PA 15366
P: (724) 258-7857
F: (724) 258-8876
PADEP: 63-04247

1200 River Avenue
Williamsport, PA 17701
P: (570) 321-9002
F: (570) 321-1957
PADEP: 41-04880

Tri-County Joint Municipal Authority
26 Monongahela Street
Millsboro, PA 15348

Reported: 08/28/2014 14:28

Lab Sample ID#: 4082593-03
Sample Type: Drinking Water
Sample Source: Grab
Sampler: Robert Mangis
Client Sample ID: Sweeties Cinnamon House

Sample Date: 08/22/2014 15:04
Receipt Date: 08/22/2014 16:45

Analyte	Sample Result	Units	Data Qualifier	RL	Method	Analyst/Certification	Analysis Date/Time
Field Analysis							
Chlorine, Total	1.34	mg/L			SM4500-CL.G-00	RM	08/22/14 15:04
Microbiology							
Total Coliform	Abstnt	per 100 mL		1	SM9223 B-04	LMP/S	08/24/14 08:00
E. Coli	Abstnt	per 100 mL		1	SM9223 B-04	LMP/S	08/24/14 08:00
<i>Above analysis prepared on 08/23/14 08:00</i>							

This sample MEETS current EPA and DEP bacteriological standards of no detectable coliform bacteria per 100 mL sample.



1803 Philadelphia St.
Indiana, PA 15701
P: (724) 463-7151
F: (724) 465-4209
PADEP: 32-00382

1276 Bentleysville Rd.
Van Vleet, PA 15355
P: (724) 258-7151
F: (724) 258-8376
PADEP: 63-04247

1200 River Avenue
Williamsport, PA 17701
P: (570) 321-9001
F: (570) 321-1957
PADEP: 41-04880

Tri-County Joint Municipal Authority
26 Monongahela Street
Millsboro, PA 15348

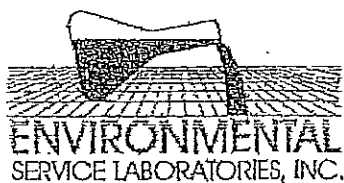
Reported: 08/28/2014 14:28

Lab Sample ID#: 4082593-04
Sample Type: Drinking Water
Sample Source: Grab
Sampler: Robert Mangis
Client Sample ID: Dave Carnahan

Sample Date: 08/22/2014 15:30
Receipt Date: 08/22/2014 16:45

Analyte	Sample Result	Units	Data Qualifier	RL	Method	Analyst/Certification	Analysis Date/Time
Field Analysis							
Chlorine, Total	1.81	mg/L			SM4500-Cl-G-00	RM	08/22/14 15:30
Microbiology							
Total Coliform	Absent	per 100 mL		1	SM9223 B-04	LMP/S	08/24/14 08:00
E. Coli	Absent	per 100 mL		1	SM9223 B-04	LMP/S	08/24/14 08:00
<i>Above analysis prepared on 08/23/14 08:00</i>							

This sample MEETS current EPA and DEP bacteriological standards of no detectable coliform bacteria per 100 mL sample.



1803 Philadelphia St.
Indiana, PA 15701
P: (724) 463-7857
F: (724) 463-4208
PADEP: 32-00382

1276 Bentleyville Rd.
Van Vleet, PA 15366
P: (724) 258-7857
F: (724) 258-8376
PADEP: 63-04247

1200 River Avenue
Williamsport, PA 17701
P: (570) 321-9002
F: (570) 321-4857
PADEP: 41-04880

Tri-County Joint Municipal Authority
26 Monongahela Street
Millsboro, PA 15348

Reported: 08/28/2014 14:28

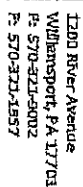
Lab Sample ID#: 4082593-05
Sample Type: Drinking Water
Sample Source: Grab
Sampler: Robert Mangis
Client Sample ID: Millsboro Lumber Co.

Sample Date: 08/22/2014 15:40
Receipt Date: 08/22/2014 16:45

Analyte	Sample Result	Units	Data Qualifier	RL	Method	Analyst/Certification	Analysis Date/Time
Field Analysis							
Chlorine, Total	1.50	mg/L			SM4500-CLG-00	RM	08/22/14 15:40
Microbiology							
Total Coliform	Absent	per 100 mL		1	SM9223 B-04	LMP/S	08/24/14 08:00
E. Coli	Absent	per 100 mL		1	SM9223 B-04	LMP/S	08/24/14 08:00

Above analysis prepared on 08/23/14 08:00

This sample MEETS current EPA and DEP bacteriological standards of no detectable coliform bacteria per 100 mL sample.



PAGE _____ OF _____

[illegible]

Department of Environmental Protection

E-Government Application for Drinking Water
Program
SAFE DRINKING WATER ACT
VIEW/EDIT RECORDS

5630045: TRI CNTY JT MUNI AUTH

SDWA1

PWSID	Contam ID	Contam	Analysis Method	Result	Analysis Date	Location ID 1	Location ID 2	Sample Date	Sample Type	Sample Time	Lab ID	Sample ID	Record ID
6630045	1927	TOTAL ALKALINITY	564	63.7	082114	300		080814	R	1535	32382	4080936-03	BROWNKA_629
6630045	2920	TOD	581	2.81	081314	300		080814	R	1535	32382	4080936-03	BROWNKA_630
6630045	2820	TGC	581	1.81	081314	300		080814	P	1535	32382	4080936-04	BROWNKA_631

5630045: TRI CNTY JT MUNI AUTH

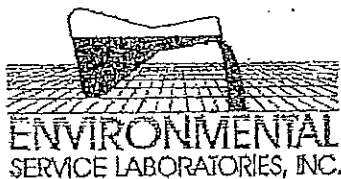
SDWA4

PWSID	Contam ID	Contam	Analysis Method	Result	Lower Limit of Detection	Counting Error	Analysis Date	Loc/EP ID	Sample Date	Sample Type	Sample Time	Lab ID	Sample ID	Record ID
6630045	2001	GROUP CODE FOR ALL VOCs	221	0.0			081314	101	080314	E	1540	32382	4080936-01	BROWNKA_485
6630045	2201	GROUP CODE FOR ALL VOCs	221	0.0			081314	101	080314	S	1535	32382	4080936-02	BROWNKA_486

5630045: TRI CNTY JT MUNI AUTH

SDWAS

PWSID	Contam ID	Contam	Analysis Method	No. of Routine Samples Recd	No. of Routine Samples Taken	No. of Routine Samples out of Compliance	No. of Check Samples out of Compliance	Sample Type	Last Sample Date	Lab ID	No. of Check Samples Taken	Lab/E P ID	Sample Period Begin Date	Sample Period End Date	Sample ID	Average Result	Record ID
6630045	0999	CHLORINE	301	10	10	0	0	D	082214	04247	0	101	080114	083114	4082593	1.42	BROWNKA_875
6630045	3100	TOTAL COLIFORM PRESENCE	331	10	10	0	0	D	082214	04247	0	101	080114	083114	4082593		BROWNKA_881



1803 Philadelphia St.
Indiana, PA 15701
P: (724) 483-7857
F: (724) 465-4209
PADEP: 32-00382

1276 Bentleyville Rd.
Van Vleet, PA 15366
P: (724) 253-7857
F: (724) 252-8376
PADEP: 63-04247

1200 River Avenue
Williamsport, PA 17701
P: (570) 321-9002
F: (570) 321-1857
PADEP: 41-04880

26 August 2014

Work Order: 4080982

Project: Drinking Water

Tri-County Joint Municipal Authority
Attn: Accounts Payable
P.O. Box 758
Fredericktown, PA 15333

Report of Analysis

Client Sample ID	Lab Sample ID	Matrix	Date Sampled	Date Received
Centerville Boro Building	4080982-01	Drinking Water	08/08/2014 13:55	08/08/2014 18:45
Joes Flower Shop	4080982-02	Drinking Water	08/08/2014 14:15	08/08/2014 18:45
Sweeties Cinnamon House	4080982-03	Drinking Water	08/08/2014 14:30	08/08/2014 18:45
Millsboro Lumber Co.	4080982-04	Drinking Water	08/08/2014 14:58	08/08/2014 18:45
Days Carnahan	4080982-05	Drinking Water	08/08/2014 14:20	08/08/2014 18:45

Report Narrative

The results contained in this report are only representative of the samples received. Environmental Service Laboratories, Inc. is not responsible for use or interpretation of the data included herein.

Definitions

ND Less than reporting limit
RL Reporting Limit
CFU Colony Forming Units

Certifications

Analyses performed by Environmental Service Laboratories, Inc., Indiana PA unless otherwise specified.

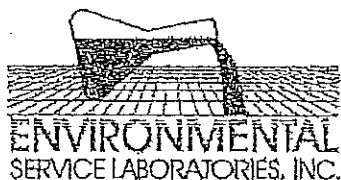
S=Environmental Service Laboratories, Inc.-Southern Division, PA DEP lab ID #63-04247

Approved By

Angela Chapman

Angela Chapman
Vice President of Operations





1803 Philadelphia St.
Indiana, PA 15701
P: (724) 463-TEST
F: (724) 465-4209
PADEP: 32-00382

1276 Bentleyville Rd.
Van Voort's, PA 15366
P: (724) 258-TEST
F: (724) 258-8376
PADEP: 63-04347

1200 River Avenue
Williamsport, PA 17701
P: (570) 821-9012
F: (570) 821-1957
PADEP: 41-04280

Tri-County Joint Municipal Authority
P.O. Box 754
Fredericktown, PA 15333

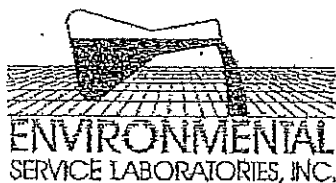
Reported: 08/26/2014 13:03

Lab Sample ID#: 4080982-01
Sample Type: Drinking Water
Sample Source: Grab
Sampler: Robert Mangis
Client Sample ID: Centerville Boro Building

Sample Date: 08/08/2014 13:55
Receipt Date: 08/08/2014 18:45

Analyte	Sample Result	Units	Data Qualifier	RL	Method	Analyst/Certification	Analysis Date/Time
Field Analysis							
Chlorine, Total	1.33	mg/L			SM4500-Cl G-00	RM	08/08/14 13:55
Microbiology							
Total Coliform	Absent	per 100 mL		1	SM9223 B-04	KJC/S	08/10/14 08:00
E. Coli	Absent	per 100 mL		1	SM9223 B-04	KJC/S	08/10/14 08:00
<i>Above analysis prepared on 08/09/14 08:00</i>							

This sample MEETS current EPA and DEP bacteriological standards of no detectable coliform bacteria per 100 mL sample.



1803 Philadelphia St.
 Iodiana, PA 15701
 P: (724) 463-TEST
 F: (724) 465-4209
 PADEP: 32-00382

1276 Bentleyville Rd.
 Van Voorhis, PA 15366
 P: (724) 258-TEST
 F: (724) 258-8376
 PADEP: 63-04247

1200 River Avenue
 Williamsport, PA 17701
 P: (570) 321-9002
 F: (570) 321-1957
 PADEP: 41-04880

Tri-County Joint Municipal Authority
 P.O. Box 758
 Fredericktown, PA 15333

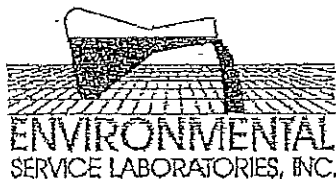
Reported: 08/26/2014 13:03

Lab Sample ID#: 4080982-02
 Sample Type: Drinking Water
 Sample Source: Grab
 Sampler: Robert Mangis
 Client Sample ID: Joes Flower Shop

Sample Date: 08/08/2014 14:15
 Receipt Date: 08/08/2014 18:45

Analyte	Sample Result	Unit	Data Qualifier	RL	Method	Analyst/Certification	Analysis Date/Time
Field Analysis							
Chlorine, Total	0.380	mg/L			SM44500-Cl G-00	RM	08/08/14 14:15
Microbiology							
Total Coliform	Absent	per 100 mL		1	SM9223 B-04	KJC/S	08/10/14 08:00
E. Coli	Absent	per 100 mL		1	SM9223 B-04	KJC/S	08/10/14 08:00
<i>Above analysis prepared on 08/09/14 08:00</i>							

This sample MEETS current EPA and DEP bacteriological standards of no detectable coliform bacteria per 100 mL sample.



1803 Philadelphia St.
Indiana, PA 15701
P: (724) 463-7651
F: (724) 465-4209
PADEP: 32-00382

1276 Bentleyville Rd.
Van Voorhis, PA 15366
P: (724) 258-TEST
F: (724) 258-8176
PADEP: 63-04247

1290 River Avenue
Williamsport, PA 17701
P: (570) 321-9002
F: (570) 321-1957
PADEP: 41-04380

Tri-County Joint Municipal Authority
P.O. Box 758
Fredericktown, PA 15333

Reported: 08/26/2014 13:03

Lab Sample ID#: 4080982-03
Sample Type: Drinking Water
Sample Source: Grab
Sampler: Robert Mangis
Client Sample ID: Sweeting Cinnamon House

Sample Date: 08/08/2014 14:30
Receipt Date: 08/08/2014 18:45

Analyte	Sample Result	Units	Data Qualifier	RL	Method	Analyst/Certification	Analysis Date/Time
Field Analysis							
Chlorine, Total	1.90	mg/L			SM4506-CI G-00	RM	08/08/14 14:30
Microbiology							
Total Coliform	Absent	per 100 mL		1	SM9223 B-04	KJC/S	08/10/14 08:00
E. Coli	Absent	per 100 mL		1	SM9223 B-04	KJC/S	08/10/14 08:00
<i>Above analysis prepared on 08/09/14 08:00</i>							

This sample MEETS current EPA and DEP bacteriological standards of no detectable coliform bacteria per 100 mL sample.



1803 Philadelphia St.
Indiana, PA 15701
P: (724) 463-TEST
F: (724) 465-4209
PADEP: 32-00382

1276 Bentleyville Rd.
Van Voorhis, PA 15366
P: (724) 258-TEST
F: (724) 258-8376
PADEP: 63-04247

1200 River Avenue
Williamsport, PA 17701
P: (570) 321-9002
F: (570) 321-1957
PADEP: 41-04880

Tri-County Joint Municipal Authority
P.O. Box 758
Fredericktown, PA 15333

Reported: 08/26/2014 13:03

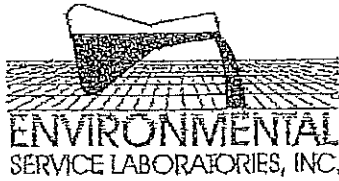
Lab Sample ID#: 4080982-04
Sample Type: Drinking Water
Sample Source: Grab
Sampler: Robert Mangis
Client Sample ID: Millsboro Lumber Co.

Sample Date: 08/08/2014 14:58
Receipt Date: 08/08/2014 18:45

Analyte	Sample Result	Units	Data Qualifier	RL	Method	Analyst Certification	Analysis Date/Time
Field Analysis							
Chlorine, Total	1.95	mg/L			SM4500-Cl G-00	RM	08/08/14 14:58
Microbiology							
Total Coliform	Absent	per 100 mL		1	SM9223 B-04	KJC/S	08/10/14 08:00
E. Coli	Absent	per 100 mL		1	SM9223 B-04	KJC/S	08/10/14 08:00

Above analysis prepared on 08/09/14 08:00

This sample MEETS current EPA and DEP bacteriological standards of no detectable coliform bacteria per 100 mL sample.



1803 Philadelphia St.
Indiana, PA 15703
P: (724) 463-7EST
F: (724) 465-4209
PADEP: 32-00382

1276 Bentleyville Rd.
Van Voorhis, PA 15766
P: (724) 258-TEST
F: (724) 258-8376
PADEP: 63-04247

1200 River Avenue
Williamsport, PA 17701
P: (570) 321-9802
F: (570) 321-1957
PADEP: 41-04880

Tri-County Joint Municipal Authority
P.O. Box 758
Fredericktown, PA 15333

Reported: 08/26/2014 13:03

Lab Sample ID#: 4080982-05
Sample Type: Drinking Water
Sample Source: Grab
Sampler: Robert Maggio
Client Sample ID: Dave Camahan

Sample Date: 08/08/2014 14:20
Receipt Date: 08/08/2014 18:45

Analyte	Sample Result	Units	Data Qualifier	RL	Method	Analyst/Certification	Analysis Date/Time
Field Analysis							
Chlorine, Total	2.19	mg/L			SM4500-Cl G-00	RM	08/08/14 14:20
Microbiology							
Total Coliform	Absent	per 100 mL		1	SM9223 B-04	KJC/S	08/10/14 08:00
E. Coli	Absent	per 100 mL		1	SM9223 B-04	KJC/S	08/10/14 08:00
<i>Above analysis prepared on 08/09/14 08:00</i>							

This sample MEETS current EPA and DEP bacteriological standards of no detectable coliform bacteria per 100 mL sample.

Page 7 of 7

PAGE OF



ENVIRONMENTAL SERVICE LABORATORIES, INC.

Sample Identification	ESL#	Sample Type				Matrix	# of Bottles	Container Type	Analysis Requested
		Composite		Grab					
		Date on/off	Time	Date	Time				
Ce-Armilla Boro Voda	4180982			8/8/14	1355	DW	1	Sterile Plastic Nathio Sulfate TC/ECC	TRC 1-2-2 TC/ECC 7-2-8
Jones Power Shop	-02			8/8/14	1415	DW	1	Sterile Plastic Nathio Sulfate TC/ECC	TRC 1-2-2 TC/ECC 7-2-8
Sweetest-Gymnasium	-03			8/8/14	1430	DW	1	Sterile Plastic Nathio Sulfate TC/ECC	TRC 1-2-2 TC/ECC 7-2-8
Millsboro Library	-04			8/8/14	1458	DW	1	Sterile Plastic Nathio Sulfate TC/ECC	TRC 1-2-2 TC/ECC 7-2-8
Dave Carnation	-05			8/8/14	1420	DW	1	Sterile Plastic Nathio Sulfate TC/ECC	TRC 1-2-2 TC/ECC 7-2-8
						4080982			
THIS UNDESIGNED PURCHASER AGREES TO PAY SERVICE CHARGES ON ACCOUNTS OVER 31 DAYS LATE. 1. THESE SERVICE CHARGES WILL ACCRUE AT THE RATE OF 1 1/2% PER MONTH (SEE ANNUAL OR THE MAXIMUM ALLOWED BY LAW.) 2. THE UNDERSIGNED PURCHASER AGREES TO PAY IN THE EVENT HIS ACCOUNT BECOMES DELINQUENT AND IS TURNED OVER TO ANY ATTORNEY FOR COLLECTION. REASONABLE ATTORNEY FEES PLUS A COURT AND ATTORNEY COLLECTION COSTS.									
<i>[Signature]</i> 8/8/14 1355-1420 Requested By: (Signature) Date: Time <i>[Signature]</i> 8/8/14 1355 Requested By: (Signature) Date: Time <i>[Signature]</i> 8/8/14 1440 Relinquished By: (Signature) Date: Time <i>[Signature]</i> Relinquished By: (Signature) Date: Time									
Company Name:						TRI-COUNTY JOINT MUN. AUTH. 26 MDNONGAHELA AVENUE CLARKSVILLE, PA 16322			
Address:						Contact person: Phons FAXC FWSDIA Purchase Order:			
724-377-2211						724-377-2212			
5630046						5630046			



1809 Philadelphia St.
Indiana, PA 15701
P: (724) 465-7657
F: (724) 465-4208
PADEP: 32-00382

1276 Bentleyville Rd.
Van Vleet, PA 15366
P: (724) 258-7857
F: (724) 258-8376
PADEP: 63-04247

1160 River Avenue
Williamsport, PA 17701
P: (570) 321-9002
F: (570) 321-1957
PADEP: 41-04880

19 August 2014

Work Order: 4080935

Project: Drinking Water

Tri-County Joint Municipal Authority
Attn: Accounts Payable
P.O. Box 758
Fredericktown, PA 15333

Report of Analysis

Client Sample ID	Lab Sample ID	Matrix	Date Sampled	Date Received
Entry Point	4080935-01	Drinking Water	08/08/2014 15:40	08/08/2014 21:15
Reservoir	4080935-02	Drinking Water	08/08/2014 15:55	08/08/2014 21:15
4080935-01 Trip Blank	4080935-03	Drinking Water	08/08/2014 00:00	08/08/2014 21:15

Report Narrative

The results contained in this report are only representative of the samples received. Environmental Service Laboratories, Inc. is not responsible for use or interpretation of the data included herein.

Definitions

ND Less than reporting limit
RL Reporting Limit
CFU Colony Forming Units

Certifications

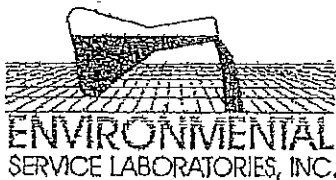
Analyses performed by Environmental Service Laboratories, Inc., Indiana PA unless otherwise specified.
Environmental Service Laboratories, Inc., Indiana, PA/TNI Certification #32-00382

Approved By

Angela Chapman

Angela Chapman
Vice President of Operations





1803 Philadelphia St.
Indiana, PA 15701
P: (724) 463-TEST
F: (724) 465-4209
PADEP: 32-00382

1275 Beasleyville Rd.
Yab Voorhis, PA 15366
P: (724) 258-TEST
F: (724) 258-8376
PADEP: 63-04247

1206 River Avenue
Williamsport, PA 17701
P: (570) 323-9002
F: (570) 321-1957
PADEP: 41-04380

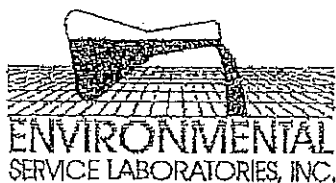
Tri-County Joint Municipal Authority
P.O. Box 758
Fredericktown, PA 15333

Reported: 08/19/2014 10:29

Lab Sample ID#: 4080935-01
Sample Type: Drinking Water
Sample Source: Grab
Sampler: Robert Mangis
Client Sample ID: Entry Point

Sample Date: 08/08/2014 15:40
Receipt Date: 08/08/2014 21:15

Analyte	Sample Result	Units	Data Qualifier	RL	Method	Analyst/Certification	Analysis Date/Time
Volatile Organics							
Vinyl chloride	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
1,1-Dichloroethene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
trans-1,2-Dichloroethene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
cis-1,2-Dichloroethene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
1,1,1-Trichloroethene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
Carbon Tetrachloride	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
Benzene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
1,2-Dichloroethane	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
Trichloroethene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
1,2-Dichloropropane	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
Toluene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
1,1,2-Trichloroethane	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
Tetrachloroethene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
Chlorobenzene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
1,1,1,2-Tetrachloroethane	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
Ethyl Benzene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
m,p-Xylenes	ND	ug/L		1.00	EPA524.2	RO	08/13/14 18:56
o-Xylene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
Styrene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
1,4-Dichlorobenzene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
1,2-Dichlorobenzene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
1,2,4-Trichlorobenzene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
Naphthalene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
Total Xylenes	ND	ug/L		0.500	EPA524.2	RO	08/13/14 18:56
Surrogate: 4-Bromofluorobenzene	97 %		70-130		EPA524.2	RO	08/13/14 18:56
Surrogate: 1,2-Dichlorobenzene-d4	98 %		70-130		EPA524.2	RO	08/13/14 18:56



1803 Philadelphia St.
Indiana, PA 15701
P: (724) 463-1151
F: (724) 465-4209
PADEP: 32-00382

1276 Bentleyville Rd.
Van Voorhis, PA 15365
P: (724) 258-1151
F: (724) 258-5376
PADEP: 63-Q4247

1200 River Avenue
Williamsport, PA 17701
P: (570) 321-9002
F: (570) 321-1957
PADEP: 41-Q4860

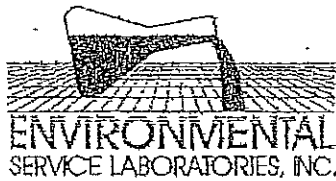
Tri-County Joint Municipal Authority
P.O. Box 758
Fredericktown, PA 15333

Reported: 08/19/2014 10:29

Lab Sample ID#: 4080935-02
Sample Type: Drinking Water
Sample Source: Grab
Sampler: Robert Mangis
Client Sample ID: Reservoir

Sample Date: 08/08/2014 15:55
Receipt Date: 08/08/2014 21:15

Analyte	Sample Result	Units	Data Qualifier	RL	Method	Analyst/Certification	Analysis Date/Time
Volatile Organics							
Vinyl chloride	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
1,1-Dichloroethene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
trans-1,2-Dichloroethene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
cis-1,2-Dichloroethene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
1,1,1-Trichloroethane	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
Carbon Tetrachloride	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
Benzene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
1,2-Dichloroethane	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
Trichloroethene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
1,2-Dichloropropane	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
Toluene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
1,1,2-Trichloroethane	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
Tetrachloroethene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
Chlorobenzene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
1,1,1,2-Tetrachloroethane	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
Ethyl Benzene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
m,p-Xylenes	ND	ug/L		1.00	EPA524.2	RO	08/13/14 19:37
o-Xylene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
Styrene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
1,4-Dichlorobenzene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
1,2-Dichlorobenzene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
1,2,4-Trichlorobenzene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
Naphthalene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
Total Xylenes	ND	ug/L		0.500	EPA524.2	RO	08/13/14 19:37
Surrogate: 4-Bromofluorobenzene	95 %		70-130		EPA524.2	RO	08/13/14 19:37
Surrogate: 1,2-Dichlorobenzene-d4	98 %		70-130		EPA524.2	RO	08/13/14 19:37



1803 Philadelphia St.
Indiana, PA 15701
P: (724) 463-7557
F: (724) 465-4209
PADEP: 32-00382

1276 Bentleyville Rd.
Van Vleet, PA 15366
P: (724) 258-7557
F: (724) 258-8376
PADEP: E3-04247

1200 River Avenue
Williamsport, PA 17701
P: (570) 321-9002
F: (570) 321-1957
PADEP: 41-04880

Tri-County Joint Municipal Authority
P.O. Box 758
Fredericktown, PA 15333

Reported: 08/19/2014 10:29

Lab Sample ID#: 4080935-03
Sample Type: Drinking Water
Sample Source: Grab
Sampler: Client
Client Sample ID: 4080935-01 Trip Blank

Sample Date: 08/08/2014 00:00
Receipt Date: 08/08/2014 21:15

Analysis	Sample Result	Units	Data Qualifier	RL	Method	Analysis/ Certification	Analysis Date/Time
Volatile Organics							
Vinyl chloride	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
1,1-Dichloroethene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
trans-1,2-Dichloroethene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
cis-1,2-Dichloroethene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
1,1,1-Trichloroethane	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
Carbon Tetrachloride	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
Benzene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
1,2-Dichloroethane	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
Trichloroethene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
1,2-Dichloropropane	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
Toluene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
1,1,2-Trichloroethane	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
Tetrachloroethene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
Chlorobenzene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
1,1,1,2-Tetrachloroethane	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
Bihyl Benzene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
m,p-Xylenes	ND	ug/L		1.00	EPA524.2	RO	08/13/14 20:19
o-Xylene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
Styrene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
1,4-Dichlorobenzene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
1,2-Dichlorobenzene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
1,2,4-Trichlorobenzene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
Naphthalene	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
Total Xylenes	ND	ug/L		0.500	EPA524.2	RO	08/13/14 20:19
Surrogate: 4-Bromofluorobenzene	95 %		70-130		EPA524.2	RO	08/13/14 20:19
Surrogate: 1,2-Dichlorobenzene-d4	100 %		70-130		EPA524.2	RO	08/13/14 20:19

1002 Philadelphia Street
Jenkens, PA 15791

(724) 463-7151
FAX (724) 468-4209

4080935

Page 5 of 6

[illegible]

DEPARTMENT OF ENVIRONMENTAL PROTECTION

E-Government Application for Drinking Water
Program
SAFE DRINKING WATER ACT
VIEW/EDIT RECORDS

5630045: TRI CNTY JT MUNI AUTH

SDWA4

PWSID	Contain	Contain	Analysis Method	Result	Lower Limit of Detection	Counting Error	Analysis Date	Location ID	Sample Date	Sample Type	Sample Time	Lab ID	Sample ID	Record ID
5630045	2001	GROUP CODE FOR ALL VOCs	221	0.0			08/31/14	101	08/08/14	E	1540	32382	4080985-01	BROWNKA 465
5630045	2001	GROUP CODE FOR ALL VOCs	221	0.0			08/31/14	101	08/08/14	S	1555	32382	4080985-02	BROWNKA 466

NEW MATTER EXHIBIT K

Defelice, Chase

From: Defelice, Chase
Sent: Tuesday, January 06, 2015 5:41 PM
To: 'Haines, Christine'
Subject: RE: Requested records under OOR order

I understand. We do not have any such records that are that specific beyond going through every medical record, which is not required. I am waiting on one of your requests to determine if a record exists pertaining to active cancer patients at SCI-Fayette. I was told I should know tomorrow. I will keep you posted and thank you for your patience.

-----Original Message-----

From: Haines, Christine [chaines@heraldstandard.com]
Sent: Tuesday, January 06, 2015 04:26 PM Eastern Standard Time
To: Defelice, Chase
Subject: Re: Requested records under OOR order

Thank you. I have received and reviewed the attached documents. Due to the snow today and limited removal of same, I took today off. Again, my RTK request was not necessarily specific to the allegations in the report. I remain interested in medical statistics since the prison opened, especially those related to diseases diagnosed among inmates after their arrival, with particular interest in cancers and kidney problems.

Christine Haines
Reporter
O: 724-425-7223 F: 724-439-7559 M: 724-691-5568
chaines@heraldstandard.com

Herald-Standard
www.heraldstandard.com

Twitter: @CHwordsmith

Calkins Media Incorporated
www.calkins.com

From: Defelice, Chase <chdefelice@pa.gov>
Sent: Tuesday, January 6, 2015 3:44 PM
To: Haines, Christine
Subject: RE: Requested records under OOR order

Christine

I left you a voicemail today. Based on the last line of your email below, I am awaiting any information I can gather. It is my understanding I should have that information tomorrow.

In the meantime, I am reattaching the records I provided with a few additional records that were gathered.

Thank you

Chase M. Defelice, Assistant Counsel
Office of General Counsel
Pennsylvania Department of Corrections
1920 Technology Parkway
Mechanicsburg, PA 17050
Phone: 717.728.7763 Fax: 717.728.0312
www.cor.state.pa.gov | www.state.pa.gov

PRIVILEGED AND CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION
ATTORNEY WORK PRODUCT

The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.

From: Haines, Christine [mailto:chaines@heraldstandard.com]
Sent: Monday, January 05, 2015 4:44 PM
To: Defelice, Chase
Subject: Requested records under OOR order

1/5/2015

Chase,

I am following up on our conversations last week regarding the partial response to my Open Records Request. As we discussed, my request was for documentation of the types of illnesses contracted by inmates at SCI-Fayette, including the various types of cancer, since its opening, as well as a comparison to other prisons within the state system. That request was made Sept. 25, 2014 and denied by the DOC on Oct. 16 for a variety of reasons, none of which was a lack of such documentation. In addition, there was no affidavit attached to the Open Records response indicating that the requested documents do not exist.

The reasons given by the DOC were found to be without basis by the Office of Open Records, which ordered that the information be released within 30 days of the Dec. 1, 2014 ruling.

On Dec. 31, I received an email with various attachments: Deaths at the SCI's from cancer from 2010-2013, Number of Patients in the system, by prison, treated for gastrointestinal issues 2010, 2011, 2012, 2013, 2014 as reported by Diamond Pharmacy Services, the number of inmates, by facility, with pulmonary conditions 2010, 2011, 2012, 2013, 2014, and a page I assume is a compilation from that time period.

In our conversation on 12/31, you indicated that you would attempt to get the medical information for the remaining years which I had requested (for as we both know, SCI-Fayette opened in August 2003.)

On that same day the DOC put out a news release, though it was not sent to the Herald-Standard offices or to me, though I was informed the next day by you that it was available on the department's web site, refuting a report from an activists' group about environmental conditions causing unsafe health conditions at the prison. The news release states that "the Department's Bureau of Health Care Services maintains an

extensive database of all current cancer patients in state prison facilities.....A more detailed analysis of the 11 cancer deaths at SCI Fayette from 2010 to 2013, revealed that four were transferred to SCI Fayette after they had been diagnosed with cancer at other institutions."

It seems from that statement that my request for information about the number of inmates diagnosed at SCI-Fayette with cancer and the types of cancer diagnosed should be readily available in the DOC database. I look forward to receiving this information at your earliest convenience, as per the Dec. 1 OOR order.

Christine Haines

Christine Haines

Reporter

O:724-425-7223 F: 724-439-7559 M: 724-691-5568

chaines@heraldstandard.com

Herald-Standard

www.heraldstandard.com

Twitter: @CHwordsmith

Calkins Media Incorporated

www.calkins.com

NEW MATTER EXHIBIT L

Defelice, Chase

From: Defelice, Chase
Sent: Wednesday, January 07, 2015 12:56 PM
To: 'Haines, Christine'
Subject: RE: Requested records under OOR order
Attachments: 201501071244.pdf

Christine

Attached is a list from the database that is kept by our vendor regarding cancer patients. The list contains inmate names and inmate numbers, which I redacted. The list shows they are Fayette inmates. This list shows the number of inmates actively treating for cancer and type of treatment. The list does not contain the type of cancer being treated for. The statistics you are requesting do not exist. I will have a declaration stating the records do not exist to follow.

Chase

From: Haines, Christine [mailto:chaines@heraldstandard.com]
Sent: Tuesday, January 06, 2015 4:26 PM
To: Defelice, Chase
Subject: Re: Requested records under OOR order

Thank you. I have received and reviewed the attached documents. Due to the snow today and limited removal of same, I took today off. Again, my RTK request was not necessarily specific to the allegations in the report. I remain interested in medical statistics since the prison opened, especially those related to diseases diagnosed among inmates after their arrival, with particular interest in cancers and kidney problems.

Christine Haines
Reporter
O: 724-425-7223 F: 724-439-7559 M: 724-691-5568
chaines@heraldstandard.com

Herald-Standard
www.heraldstandard.com

Twitter: @CHwordsmith

Calkins Media Incorporated
www.calkins.com

From: Defelice, Chase <chdefelice@pa.gov>
Sent: Tuesday, January 6, 2015 3:44 PM

To: Haines, Christine
Subject: RE: Requested records under OOR order

Christine

I left you a voicemail today. Based on the last line of your email below, I am awaiting any information I can gather. It is my understanding I should have that information tomorrow.

In the meantime, I am reattaching the records I provided with a few additional records that were gathered.

Thank you

Chase M. Defelice, Assistant Counsel
Office of General Counsel
Pennsylvania Department of Corrections
1920 Technology Parkway
Mechanicsburg, PA 17050
Phone: 717.728.7763 Fax: 717.728.0312
www.cor.state.pa.gov | www.state.pa.gov

PRIVILEGED AND CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION
ATTORNEY WORK PRODUCT

The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.

From: Haines, Christine [mailto:chaines@heraldstandard.com]
Sent: Monday, January 05, 2015 4:44 PM
To: Defelice, Chase
Subject: Requested records under OOR order

1/5/2015

Chase,

I am following up on our conversations last week regarding the partial response to my Open Records Request. As we discussed, my request was for documentation of the types of illnesses contracted by inmates at SCI-Fayette, including the various types of cancer, since its opening, as well as a comparison to other prisons within the state system. That request was made Sept. 25, 2014 and denied by the DOC on Oct. 16 for a variety of reasons, none of which was a lack of such documentation. In addition, there was no affidavit attached to the Open Records response indicating that the requested documents do not exist.

The reasons given by the DOC were found to be without basis by the Office of Open Records, which ordered that the information be released within 30 days of the Dec. 1, 2014 ruling.

On Dec. 31, I received an email with various attachments: Deaths at the SCI's from cancer from 2010-2013, Number of Patients in the system, by prison, treated for gastrointestinal issues 2010, 2011, 2012, 2013, 2014 as reported by Diamond Pharmacy Services, the number of inmates, by facility, with

pulmonary conditions 2010, 2011, 2012, 2013, 2014, and a page I assume is a compilation from that time period.

In our conversation on 12/31, you indicated that you would attempt to get the medical information for the remaining years which I had requested (for as we both know, SCI-Fayette opened in August 2003.)

On that same day the DOC put out a news release, though it was not sent to the Herald-Standard offices or to me, though I was informed the next day by you that it was available on the department's web site, refuting a report from an activists' group about environmental conditions causing unsafe health conditions at the prison. The news release states that "the Department's Bureau of Health Care Services maintains an

extensive database of all current cancer patients in state prison facilities.....A more detailed analysis of the 11 cancer deaths at SCI Fayette from 2010 to 2013, revealed that four were transferred to SCI Fayette after they had been diagnosed with cancer at other institutions."

It seems from that statement that my request for information about the number of inmates diagnosed at SCI-Fayette with cancer and the types of cancer diagnosed should be readily available in the DOC database. I look forward to receiving this information at your earliest convenience, as per the Dec. 1 OOR order.

Christine Haines

Christine Haines

Reporter

O:724-425-7223 F: 724-439-7559 M: 724-691-5568

chaines@heraldstandard.com

Herald-Standard

www.heraldstandard.com

Twitter: @CHwordsmith

Calkins Media Incorporated

www.calkins.com

Home Inst.	I/M name	I/M #	TREATMENT OFF/ON	TYPE
FAVETTE	[REDACTED]	[REDACTED]	OFF	CHEMO/RAD/SURGERY
FAVETTE	[REDACTED]	[REDACTED]	OFF	IN-PATIENT CHEMO
FAVETTE	[REDACTED]	[REDACTED]	OFF	RADIATION
FAVETTE	[REDACTED]	[REDACTED]		HORMONE
FAVETTE	[REDACTED]	[REDACTED]	ON	RADIATION
FAVETTE	[REDACTED]	[REDACTED]		UNDER PLANNING

NEW MATTER EXHIBIT M

Defelice, Chase

From: Defelice, Chase
Sent: Wednesday, January 07, 2015 1:33 PM
To: 'Haines, Christine'
Subject: RE: Requested records under OOR order
Attachments: 201501071259.pdf

I was told it was current treating patients.
Attached are statistics that are slightly outdated from November of 2014.

From: Haines, Christine [mailto:chaines@heraldstandard.com]
Sent: Wednesday, January 07, 2015 1:14 PM
To: Defelice, Chase
Subject: Re: Requested records under OOR order

Chase, what is the date of this report?

Christine Haines
Reporter
O:724-425-7223 F: 724-439-7559 M: 724-691-5568
chaines@heraldstandard.com

Herald-Standard
www.heraldstandard.com

Twitter: @CHwordsmith

Calkins Media Incorporated
www.calkins.com

From: Defelice, Chase <chdefelice@pa.gov>
Sent: Wednesday, January 7, 2015 12:55 PM
To: Haines, Christine
Subject: RE: Requested records under OOR order

Christine

Attached is a list from the database that is kept by our vendor regarding cancer patients. The list contains inmate names and inmate numbers, which I redacted. The list shows they are Fayette inmates. This list shows the number of inmates actively treating for cancer and type of treatment. The list does not contain the type of cancer being treated for. The statistics you are requesting do not exist. I will have a declaration stating the records do not exist to follow.

Chase

From: Haines, Christine [mailto:chaines@heraldstandard.com]

Sent: Tuesday, January 06, 2015 4:26 PM

To: Defelice, Chase

Subject: Re: Requested records under OOR order

Thank you. I have received and reviewed the attached documents. Due to the snow today and limited removal of same, I took today off. Again, my RTK request was not necessarily specific to the allegations in the report. I remain interested in medical statistics since the prison opened, especially those related to diseases diagnosed among inmates after their arrival, with particular interest in cancers and kidney problems.

Christine Haines

Reporter

O: 724-425-7223 F: 724-439-7559 M: 724-691-5568

chaines@heraldstandard.com

Herald-Standard

www.heraldstandard.com

Twitter: @CHwordsmith

Calkins Media Incorporated

www.calkins.com

From: Defelice, Chase <chdefelice@pa.gov>

Sent: Tuesday, January 6, 2015 3:44 PM

To: Haines, Christine

Subject: RE: Requested records under OOR order

Christine

I left you a voicemail today. Based on the last line of your email below, I am awaiting any information I can gather. It is my understanding I should have that information tomorrow.

In the meantime, I am reattaching the records I provided with a few additional records that were gathered.

Thank you

Chase M. Defelice, Assistant Counsel

Office of General Counsel

Pennsylvania Department of Corrections

1920 Technology Parkway

Mechanicsburg, PA 17050
Phone: 717.728.7763 Fax: 717.728.0312
www.cor.state.pa.gov | www.state.pa.gov

PRIVILEGED AND CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION
ATTORNEY WORK PRODUCT

The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.

From: Haines, Christine [<mailto:chaines@heraldstandard.com>]
Sent: Monday, January 05, 2015 4:44 PM
To: Defelice, Chase
Subject: Requested records under OOR order

1/5/2015

Chase,

I am following up on our conversations last week regarding the partial response to my Open Records Request. As we discussed, my request was for documentation of the types of illnesses contracted by inmates at SCI-Fayette, including the various types of cancer, since its opening, as well as a comparison to other prisons within the state system. That request was made Sept. 25, 2014 and denied by the DOC on Oct. 16 for a variety of reasons, none of which was a lack of such documentation. In addition, there was no affidavit attached to the Open Records response indicating that the requested documents do not exist.

The reasons given by the DOC were found to be without basis by the Office of Open Records, which ordered that the information be released within 30 days of the Dec. 1, 2014 ruling.

On Dec. 31, I received an email with various attachments: Deaths at the SCI's from cancer from 2010-2013, Number of Patients in the system, by prison, treated for gastrointestinal issues 2010, 2011, 2012, 2013, 2014 as reported by Diamond Pharmacy Services, the number of inmates, by facility, with pulmonary conditions 2010, 2011, 2012, 2013, 2014, and a page I assume is a compilation from that time period.

In our conversation on 12/31, you indicated that you would attempt to get the medical information for the remaining years which I had requested (for as we both know, SCI-Fayette opened in August 2003.)

On that same day the DOC put out a news release, though it was not sent to the Herald-Standard offices or to me, though I was informed the next day by you that it was available on the department's web site, refuting a report from an activists' group about environmental conditions causing unsafe health conditions at the prison. The news release states that "the Department's Bureau of Health Care Services maintains an

extensive database of all current cancer patients in state prison facilities.....A more detailed analysis of the 11 cancer deaths at SCI Fayette from 2010 to 2013, revealed that four were transferred to SCI Fayette after they had been diagnosed with cancer at other institutions."

It seems from that statement that my request for information about the number of inmates diagnosed at SCI-Fayette with cancer and the types of cancer diagnosed should be readily available in the DOC database. I look forward to receiving this information at your earliest convenience, as per the Dec. 1 OOR order.

Christine Haines

Christine Haines

Reporter

O: 724-425-7223 F: 724-439-7559 M: 724-691-5568

chaines@heraldstandard.com

Herald-Standard

www.heraldstandard.com

Twitter: @CHwordsmith

Calkins Media Incorporated

www.calkins.com

**Oncology
Summary**

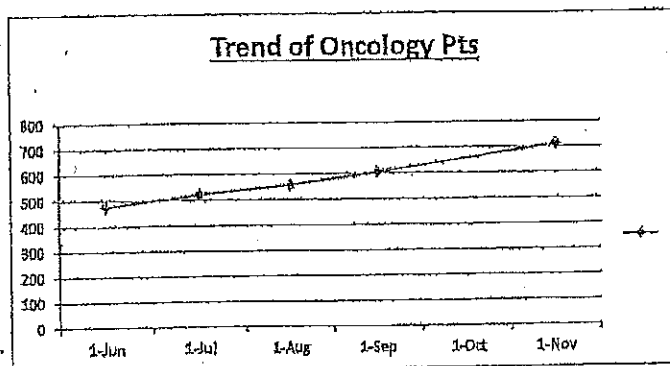
As of November 13, 2014

	Oncology Work Up	In treatment	Observation	No Cancer Rem	Treated at Pittsburgh
Albion		10	10	9	
Bentley		8	14	12	
Camp Hill		8	8	10	
Cambridge Spgs		4	2	8	
Chester		4	12		
Coal		12	12	11	1
Dallas		6	21	13	
Fayette		4	14	13	
Forest	1	2	8	4	1
Frackville	1	1	5		
Graterford	3	19	34	20	2
Greene		4	4	8	1
Houtzdale		3	3	5	1
Huntingdon	1	5	10	21	
Laurel Highlands		6	23	23	1
Mahanoy		13	14	17	
Mercer		3	9	12	
Muncy	1	16	14	10	
Pine Grove		1	6	3	
Pittsburgh			9		11
Quehanna				2	
Rehoboth	2	1	3	3	
Rockview		6	15	6	
Smithfield	2	4	13	13	
Somerset		5	20	10	
Waymart		8	9	6	
Total	11	153	292	237	18

711

Oncology Pts

2-Jun 475 7-Jul 521 8-Aug 557 9-Sep 604 13-Nov 711



NEW MATTER EXHIBIT N

Defelice, Chase

From: Defelice, Chase
Sent: Wednesday, January 07, 2015 2:50 PM
To: 'Haines, Christine'
Subject: RE: Requested records under OOR order
Attachments: 201501071439.pdf

Christine

Attached is an attestation from our Director of Bureau of Health Care Services.

Thank you

Chase M. Defelice, Assistant Counsel
Office of General Counsel
Pennsylvania Department of Corrections
1920 Technology Parkway
Mechanicsburg, PA 17050
Phone: 717.728.7763 Fax: 717.728.0312
www.cor.state.pa.gov | www.state.pa.gov

PRIVILEGED AND CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION ATTORNEY WORK PRODUCT

The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.

From: Haines, Christine [mailto:chaines@heraldstandard.com]
Sent: Wednesday, January 07, 2015 1:14 PM
To: Defelice, Chase
Subject: Re: Requested records under OOR order

Chase, what is the date of this report?

Christine Haines
Reporter
O: 724-425-7223 F: 724-439-7559 M: 724-691-5568
chaines@heraldstandard.com

Herald-Standard
www.heraldstandard.com

Twitter: @CHwordsmith

Calkins Media Incorporated
www.calkins.com

From: Defelice, Chase <chdefelice@pa.gov>
Sent: Wednesday, January 7, 2015 12:55 PM
To: Haines, Christine
Subject: RE: Requested records under OOR order

Christine

Attached is a list from the database that is kept by our vendor regarding cancer patients. The list contains inmate names and inmate numbers, which I redacted. The list shows they are Fayette inmates. This list shows the number of inmates actively treating for cancer and type of treatment. The list does not contain the type of cancer being treated for. The statistics you are requesting do not exist. I will have a declaration stating the records do not exist to follow.

Chase

From: Haines, Christine [<mailto:chaines@heraldstandard.com>]
Sent: Tuesday, January 06, 2015 4:26 PM
To: Defelice, Chase
Subject: Re: Requested records under OOR order

Thank you. I have received and reviewed the attached documents. Due to the snow today and limited removal of same, I took today off. Again, my RTK request was not necessarily specific to the allegations in the report. I remain interested in medical statistics since the prison opened, especially those related to diseases diagnosed among inmates after their arrival, with particular interest in cancers and kidney problems.

Christine Haines
Reporter
O: 724-425-7223 F: 724-439-7559 M: 724-691-5568
chaines@heraldstandard.com

Herald-Standard
www.heraldstandard.com

Twitter: @CHwordsmith

Calkins Media Incorporated
www.calkins.com

From: Defelice, Chase <chdefelice@pa.gov>
Sent: Tuesday, January 6, 2015 3:44 PM
To: Haines, Christine
Subject: RE: Requested records under OOR order

Christine

I left you a voicemail today. Based on the last line of your email below, I am awaiting any information I can gather. It is my understanding I should have that information tomorrow.

In the meantime, I am reattaching the records I provided with a few additional records that were gathered.

Thank you

Chase M. Defelice, Assistant Counsel
Office of General Counsel
Pennsylvania Department of Corrections
1920 Technology Parkway
Mechanicsburg, PA 17050
Phone: 717.728.7763 Fax: 717.728.0312
www.cor.state.pa.gov | www.state.pa.gov

PRIVILEGED AND CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION
ATTORNEY WORK PRODUCT

The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.

From: Haines, Christine [<mailto:chaines@heraldstandard.com>]
Sent: Monday, January 05, 2015 4:44 PM
To: Defelice, Chase
Subject: Requested records under OOR order

1/5/2015

Chase,

I am following up on our conversations last week regarding the partial response to my Open Records Request. As we discussed, my request was for documentation of the types of illnesses contracted by inmates at SCI-Fayette, including the various types of cancer, since its opening, as well as a comparison to other prisons within the state system. That request was made Sept. 25, 2014 and denied by the DOC on Oct. 16 for a variety of reasons, none of which was a lack of such documentation. In addition, there was no affidavit attached to the Open Records response indicating that the requested documents do not exist.

The reasons given by the DOC were found to be without basis by the Office of Open Records, which ordered that the information be released within 30 days of the Dec. 1, 2014 ruling.

On Dec. 31, I received an email with various attachments: Deaths at the SCI's from cancer from 2010-2013, Number of Patients in the system, by prison, treated for gastrointestinal issues 2010, 2011, 2012, 2013, 2014 as reported by Diamond Pharmacy Services, the number of inmates, by facility, with pulmonary conditions 2010, 2011, 2012, 2013, 2014, and a page I assume is a compilation from that time period.

In our conversation on 12/31, you indicated that you would attempt to get the medical information for the remaining years which I had requested (for as we both know, SCI-Fayette opened in August 2003.)

On that same day the DOC put out a news release, though it was not sent to the Herald-Standard offices or to me, though I was informed the next day by you that it was available on the department's web site, refuting a report from an activists' group about environmental conditions causing unsafe health conditions at the prison. The news release states that "the Department's Bureau of Health Care Services maintains an

extensive database of all current cancer patients in state prison facilities.....A more detailed analysis of the 11 cancer deaths at SCI Fayette from 2010 to 2013, revealed that four were transferred to SCI Fayette after they had been diagnosed with cancer at other institutions."

It seems from that statement that my request for information about the number of inmates diagnosed at SCI-Fayette with cancer and the types of cancer diagnosed should be readily available in the DOC database. I look forward to receiving this information at your earliest convenience, as per the Dec. 1 OOR order.

Christine Haines

Christine Haines

Reporter

O:724-425-7223 F: 724-439-7559 M: 724-691-5568

chaines@heraldstandard.com

Herald-Standard

www.heraldstandard.com

Twitter: @CHwordsmith

Calkins Media Incorporated

www.calkins.com

DECLARATION OF CHRISTOPHER OPPMAN

I, Christopher Oppman, hereby declare under the penalty of perjury, pursuant to 18 Pa. C.S. § 4904, that the following statements are true and correct based upon my personal knowledge, information, and belief:

1. Currently, the Department of Corrections of the Commonwealth of Pennsylvania ("Department") employs me as the Director for the Bureau of Health Care Services ("BHCS").

2. In my capacity as Director of BHCS, I, *inter alia*, oversee the administration of medical, mental health and dental services to the inmate population; oversee and ensure contract compliance with vendors of professional medical services; supervise quality of the delivery of medical services; develop, monitor and supervise the application of policy as it pertains to the delivery of medical services within the Department, including the administration and enforcement of security as it relates to those policies and the BHCS.

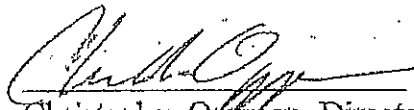
3. I am aware of Christine Haines requested pursuant to the Right-to-Know Law for "report of the illnesses contracted at SCI Fayette, by type and quantity (i.e. how many cases of each diagnosis) and comparison of illness rates at other SCI's."

4. The Department as previously provided records to Ms. Haines regarding this request.

5. I have reviewed the records that were provided to Ms. Haines.

6. Beyond the records previously provided to Ms. Haines, the Department does not have within its custody, possession, or control, reports of illnesses contracted at SCI-Fayette, by type and quantity and comparison of illness rates at other state correctional institutions.

Respectfully submitted,



Christopher Oppman, Director
Bureau of Health Care Services
Pennsylvania Department of Corrections

Date: January 7, 2015

NEW MATTER EXHIBIT O

Defelice, Chase

From: Defelice, Chase
Sent: Tuesday, February 17, 2015 9:45 AM
To: 'Joyce, Michael J.'
Cc: Kelly, Charles
Subject: RE: Uniontown Newspapers, Inc., et al. v. Pennsylvania Department of Corrections
Attachments: DOH Review of Cancer Burden at SCI Fayette 12-29-2014.pdf

Mr. Joyce and Mr. Kelly

Attached is the Department of Health's final report. It was on our public website last week, so I am sure Ms. Haines has already reviewed it. I explained to her in our past conversations that I would send it to her once I received it. I was out last week with our newest addition, and that is why I didn't send it earlier. If you have already seen the report you can simply disregard the email. If you have not, there may be information on the statistical end that is responsive to what Ms. Haines was looking for. The Department of Health has access to the Pennsylvania Cancer Registry, which is something the Department of Corrections does not have access to. It appears that was one of their resources.

Thank you and have a nice day.

Sincerely,

Chase M. Defelice, Assistant Counsel
Office of General Counsel
Pennsylvania Department of Corrections
1920 Technology Parkway
Mechanicsburg, PA 17050
Phone: 717.728.7763 Fax: 717.728.0312
www.cor.state.pa.gov | www.state.pa.gov

**PRIVILEGED AND CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION
ATTORNEY WORK PRODUCT**

The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.

From: Joyce, Michael J. [mailto:mjoyce@saul.com]
Sent: Monday, February 09, 2015 5:55 PM
To: Filkosky, Andrew; Defelice, Chase
Cc: Kelly, Charles
Subject: Uniontown Newspapers, Inc., et al. v. Pennsylvania Department of Corrections

Gentlemen:

Please be advised that this law firm represents Uniontown Newspapers, Inc. (d/b/a The Herald Standard) and Christine Haines with regard to their recent open records request to the Pennsylvania Department of Corrections. Attached, please the Petition for Review and Enforcement of Final Determination of Office of Open Records, which was recently filed with the Commonwealth Court of Pennsylvania.

Please feel free to contact me or Attorney Charles Kelly if you have any questions.

Michael J. Joyce | Saul Ewing LLP
One PPG Place, Suite 3010
Pittsburgh, PA 15222
Direct: 412-209-2539
Mobile: 412-996-4178
Fax: 412-209-2585
E-mail: mjoyce@saul.com



"Saul Ewing LLP <saul.com>" made the following annotations:

+~~~~~+

This e-mail may contain privileged, confidential, copyrighted, or other legally protected information. If you are not the intended recipient (even if the e-mail address is yours), you may not use, copy, or retransmit it. If you have received this by mistake please notify us by return e-mail, then delete.

+~~~~~+



pennsylvania
DEPARTMENT OF HEALTH

DATE: December 29, 2014

SUBJECT: Review of Cancer Burden at the PA State Correctional Institute - Fayette

TO: Martin Rancovsky, MA
Deputy Secretary for Health Planning & Assessment

FROM: Atmaram Nambiar, MD, MPH
Director, Division of Infectious Disease
Epidemiology
(717) 787-3350

Per the request of the Pennsylvania Department of Corrections, Bureau of Health Care Services, through Christopher H. Oppman, MBA, MHA, Director Department of Corrections, Bureau of Health Care Services, the Pennsylvania Department of Health was asked to evaluate the cancer concerns of inmates and advocacy groups regarding cancer risks at the State Correctional Institute-Fayette. In response, PADOH/ Bureau of Epidemiology developed the attached report. We believe the findings serve as an objective assessment of the cancer burden and risk at the facility. A summary of the findings appear on the last page of the text.

If you have any questions, please contact Dr. Gene Weinberg (gweinberg@pa.gov).

REVIEW OF THE CANCER
BURDEN AT THE PENNSYLVANIA
STATE CORRECTIONAL INSTITUTION FAYETTE

Background

In August 2013 the *Human Rights Coalition, Center for Coalfield Justice, and the Abolitionist Law Center* of western Pennsylvania began an investigation of health conditions of prisoners at the Commonwealth of Pennsylvania, Department of Corrections (PADOC), *State Correctional Institution - Fayette* (SCI Fayette). The need for an investigation was prompted by reports of a pattern of declining health among inmates with a variety of symptoms and diseases believed to be possibly linked to exposures to toxic coal waste surrounding the facility. Health problems were described as; respiratory throat and sinus conditions, skin irritation and rashes, gastrointestinal tract problems, pre-cancerous growths and cancers, thyroid disorders, eye problems, headaches, dizziness, hair loss, weight loss, fatigue, and loss of mental focus and concentration. That investigation resulted in the report, "*No Escape: Exposure to Toxic Coal Waste at State Correctional Institution Fayette*". The report included a description of the ambient environment and health problems. It led the PADOC to seek the expertise of the Pennsylvania Department of Health (PADOH) to review the content related to cancer rates.

In response, the Bureau of Epidemiology (BOE) carried out a cancer incidence analysis. The PADOH is sensitive to concerns of individuals with cancer whether they are residents of a municipality, a neighborhood, or an institution. The types of cancer, relative frequencies, in addition to incidence rates or risks were ascertained for inmates of the SCI Fayette facility using the files of the *Pennsylvania Cancer Registry* (PCR). The PCR was utilized rather than "self-reports" to assure all cancers (cases) diagnosed among inmates were counted and the most accurate information was used.

The Pennsylvania Department of Corrections state prison is a maximum security facility for males located in the community of LaBelle in Luzerne Township, Fayette County. It is situated on land formerly used as a dump for coal waste in the form of "*coal refuse*" (waste produced when coal is cleaned and graded before it is burned), and "*coal ash*" (waste produced

by burning coal in power plants throughout the region). In 1996 the owners of the coal waste disposal facility which originally occupied 1,357 acres transferred 237 acres to the Commonwealth of Pennsylvania for the construction of the SCI Fayette prison completed in September 2003. The prison is currently surrounded by approximately 40 million tons of waste, two coal slurry ponds, and millions of cubic yards of coal combustion waste. Concern about the ambient environment coupled with inmates' health problems lead prisoners, human rights groups, prisoners' rights groups, and environmental justice groups to question the health effects of pollutants from the waste facility, and to conduct an *investigation* of health effects.

That investigation was based on a mailed questionnaire to prisoners. Survey questions addressed individual health problems, and environmental conditions at the facility. As of July 2014, 152 surveys had been sent, with 63 prisoners responding and another 12 prisoners writing separately to describe their health "*situation*", with an additional four prisoners interviewed directly by an investigation team member. Study findings reported 17 prisoners died at the SCI Fayette facility, eleven from cancer. Cancer cases identified by prisoners or described by the medical management of the PADOH included these cases; 3 lung, 2 brain, 2 colon-rectum, 2 tongue and mouth, 1 tonsil, 1 stomach, 2 liver, 1 bladder, 1 prostate, 1 lymphoma, and 1 leukemia for a total of 17 cancer cases.

While the information is valuable, self-reported diseases can be problematic. First, if reports are not validated using information found in medical records there is no way to know if the reported case is actually cancer and the exact type. This requires microscopic determination from tissue samples. Most new tissue growths (neoplasms) aren't cancer, rather are benign but can include precancerous lesions. Histological examination of tissue specimens is the only valid way to determine if cells of a neoplasm are malignant. Additionally, self-reported cancers typically describe the organ site lesions were found, but often it is independent of the standard classification system which is based on *site of origin*. For example, cancers of the stomach may often evolve from the organ's lymph tissue, but because lymph tissue develops from a distinct class of embryonic cells and lymphocytes are so specialized, they are classified as a distinct group of cancers, and are organized based on histological characteristics rather than anatomical location, consequently are generally considered and counted as a type of *non-Hodgkin's lymphoma* (NHL).

Additionally, misclassification can occur if a cancer arises at a single organ site and spreads to adjacent or more distant organs. Though it spread to other organs, a cancer will still retain the cellular characteristics of the tissue of origin but is considered *metastatic*. As such, it should be ascribed to the organ of origin as the primary site, not the site to where it spread. Self-reported cancers frequently are not correct if they are metastatic lesions. For example, if malignant lung tissue is discovered in the brain it should be labeled as such, i.e., "*metastatic adenocarcinoma of the lung*", not brain cancer.

Any determination of a population's risk needs to be based on *incidence rates*, or the rate *new cases* develop in the population during a defined period of time. This is not the same as counting *all* inmates in the prison who had ever been diagnosed with a particular cancer, or *prevalence*. In any group the number of persons living with cancer is always larger than the number of new cases diagnosed, as prevalence includes both *new* and *old* cases, and often can be large. While the total number of men who have had cancer is an important measure of the disease burden, it is not considered a measure of risk. The determination of factors responsible for the development of a type of cancer is generally linked to the *incidence rate*. When the number of new cases is divided by the number of individuals at risk - typically the population studied- the incidence rate is created. Commonly, reports of persons diagnosed with cancer who ever lived in a community are considered a measure of risk when it is a measure of prevalence.

The PADOH report, "*Review of the Cancer Burden at the Pennsylvania State Correctional Institution Fayette*" [study] was designed to provide objective measures of cancer risk for inmates of SCI Fayette relative to all Pennsylvania males. To best determine incidence and rates among inmates, the Pennsylvania Cancer Registry (PCR) was used. This provided the most complete and accurate measures of cancer rates or risks in the population. Both the numbers and types of new cases diagnosed among inmates were determined, and the rates for individual cancer types were calculated and compared to the statewide experience of all men.

Methods

Case Ascertainment

Cancer cases were defined as inmates of PADOH, SCI Fayette who had been diagnosed with cancer between September 1, 2003 and December 31, 2012; from initial occupancy at the

prison (September 2003) through the most current calendar year cancer incidence reporting was complete and data were verified - 2012. Based on this time period, the files of the PCR were searched for all cancer cases that ever showed any of the following for residence at diagnosis for any reason; "SCI Fayette", "SCI Fayette County", "50 Overlook Drive", "421 LaBelle Rd", "SCI Labelle", "La Belle", "LaBelle" and a zip code of 15450. The diagnosis data examined included the following residence items; "DxCity", "DxNumberAndStreet", "DxPostal", in addition to current address information, including; "CurrCity", "CurrSupp", "CurrPostalZip". This identified any man who had ever been diagnosed either at the facility or whose *current* address was the prison following a diagnosis.

Description of Cases

Ascertained cases were sorted according to the anatomical and histological classification scheme defined by the World Health Organization, *WHO International Classification of Disease for Oncology*, Third Edition, 2000. A total of 45 incident cancers met the inclusion criteria. These were diagnosed among 41 prisoners; one prisoner had been diagnosed with three malignancies, two others were each diagnosed with two cancers, and 38 prisoners diagnosed with one cancer each. Table 1 shows the distribution of these cases by type for prisoners compared to all adult Pennsylvania male cases. Comparisons were based on the statewide distribution during the three-year period 2007-2009 (approximate mid-period). This represented 114,630 incident cases or about 38,200 new diagnoses among Pennsylvania males annually.

The PADOH determined the cancer risk of prisoners by a method called *indirect* age-adjustment which is particularly suited for studying small numbers of health events. The incidence rate for prisoners was compared to the rate for all Pennsylvania males and expressed as the ratio of the two, called the Standardized Incidence Ratio or *SIR*. It is equivalent to the number of cases observed / cases expected. Ratios were created by comparing the numbers of cancers reported to the registry for the prison population to the number that would be expected in this population if it had experienced the same cancer risks as all men in the state. Here the PADOH applied *Pennsylvania's* statewide incidence rates for men over age twenty to the numbers of prisoners at risk in the prison to determine the numbers of cancers *expected*. Cases expected were based on Pennsylvania's rates rather than U.S. rates for two reasons. The PADOH routinely uses statewide rates for population studies, thus making risk comparisons between the current

findings and other studies possible; and, second, interpreting results is easier as the characteristics of Pennsylvania are generally better understood than the entire U.S.

Specifically, the numbers of cancer cases *expected* for a cancer type was derived by multiplying the population of inmates in each age group by the *cancer-specific* statewide male incidence rate for the same age-group. Ten 5-year age groups were used; 20-24, 25-29, 30-34 . . . 55-59, 60-64, and 65+. Cancer risks for white, black and Hispanic males can differ considerably. To control for differences, the state's age-specific rate for each group was weighted by the proportion of the prison population represented by each group to produce a weighted white-black-Hispanic male age-specific incidence rate. Proportions used to weight age-specific rates for whites, blacks, and Hispanics were, $p_1=0.394$, $p_2=0.494$, and $p_3=0.112$, respectively; where $p_1 + p_2 + p_3=1.000$. For each cancer type, the numbers of cancer cases expected for each age group were summed across ages to obtain the total number of cases expected in the prison population. When cancer risks were the same for prisoners as men statewide, then observed numbers of cases should be the same as the number expected. Thus, an SIR close to 1.00 indicates the incidence rate or risk experienced by inmates is the same as other men living in the state. An SIR greater than 1.00 [Obs./Exp. >1.00] suggests the cancer rate is elevated relative to the state, and similarly a ratio less than 1.00 indicates the study group's risk is lower than male residents of Pennsylvania.

Results

Table 1 shows both the distribution of all 45 cases diagnosed between September 2003 and December 2012, and 114,630 statewide cases for the 2007-2009 three years period. The four leading types diagnosed for state males were colon & rectum, bronchus & lung, prostate and urinary bladder. Together they accounted for 67,747 cases or 59.1 percent of total cancers, while among inmates 25 cases or 55.5 percent. Though the numbers of cases diagnosed for prisoners were small their distribution was similar to all Pennsylvania males. Percentages varied from the state by less than 2.0 percent for eleven types; esophagus, stomach, pancreas, larynx, bronchus & lung, urinary bladder, prostate, brain/CNS, thyroid, NH lymphomas, leukemia. Only for liver cancer was the proportion of cases greater than five percent (8.9 % versus 2.0%) compared to Pennsylvania.

Table 2 shows the SIR values for 17 individual cancer types and All Cancers combined. For nearly every type, the numbers of cases diagnosed for prisoners were fewer than expected based on statewide incidence rates for men. But significantly lower rates were found only for colon-rectum ($SIR=0.51$, 3 obs./5.85 exp.), bronchus & lung ($SIR=0.76$, 6 obs./7.93 exp.), and prostate cancer ($SIR=0.62$, 12 obs./19.26 exp.), in addition to All Cancers ($SIR=0.70$, 45 obs./64.7 exp.). Whereas significantly elevated rates were seen for only liver cancers ($SIR=1.52$, 4 obs. / 2.63 exp.). While incidence ratios exceeded 1.00 for urinary bladder ($SIR=1.76$), Hodgkin's lymphoma ($SIR=2.67$), and leukemia ($SIR=1.32$) these were not statistically significant.

Discussion

This study was conducted with the purpose of defining the cancer burden among inmates examining the types of cancer, their relative frequencies, and the incidence rates or risks. Based on the medical and epidemiological literature several well established risk factors causally linked to specific cancers can likely explain the variations in rates from expectation based on risk factors associated with some prisoners. These are discussed in the medical and public health literature and summarized here.

Bronchus, Lung and Other Respiratory Cancers

The rate of lung cancer appears to be about 24 percent lower than Pennsylvania males ($SIR=0.76$). If these inmates were long time cigarette smokers, it's fairly certain their behavior was responsible for their disease. Tobacco smoke causes 85 to 90 percent of all bronchus and lung cancer cases therefore when cancer rates differ between populations, it can be attributed to differences in smoking prevalence rather than other sources of carcinogens. In addition nasal, oral, and laryngeal cancers are directly caused by cigarettes too. The types and proportions of cases attributable are; mouth [0.65], larynx [70.]; where a history of excessive alcohol consumption adds to the risks.

Tobacco smoke is a major source of pollution. It contains 7,000 chemicals, 250 are very harmful and affect every system of the body. Health affects occur from their absorption through tissues lining the respiratory and digestive tracts and from chemicals transported to other organs through the blood. Toxic substances include; 1) metals, comprising arsenic, beryllium, cadmium, chromium, and nickel, 2) radioactive elements polonium-210 and lead-210 metals and

radon, 3) toxic hydrocarbons including very potent carcinogens; 1,3 butadiene, vinyl chloride, in addition to formaldehyde, benzo-*a*-pyrene and toluene .

Urinary Bladder, Kidney, Pancreas, Esophagus, Liver

In addition to respiratory cancers, other types caused from tobacco smoke and the percent of cases attributable are; pancreas - 22%, Liver - 15%, kidney-27%, urinary bladder-40%, and esophagus up to 70 % when combined with long term heavy alcohol consumption. Together there were 12 tobacco-related cancer cases diagnosed among these inmates. If long-term smoking was characteristic of each case then it would be reasonable to expect at least half or six occurred from tobacco use (cigarettes, cigarillos, cigars).

Colon-rectum

Three cases were diagnosed during the 2003-2012 period. While several risk factors are recognized, it is not clear the magnitude of the risk conveyed. Diets high in fat and/or low in fiber content are associated. Other high-risk conditions include history of adenomatous polyps, familial polyposis syndrome, and inflammatory bowel disease. Environmental carcinogens have been explored primarily in relation to food consumption. Animal and experimental studies show that heterocyclic aromatic amines (HAA) serve as mutagens and are the result of both the type of foods consumed and how they are prepared. Sources include heating of fats, as well as meats and fish that are smoked, barbecued or cured. However, these food sources alone do not seem to account for the higher rates that we see in Pennsylvania. Other important factors include calcium consumption (preventative), vitamin D consumption (preventative), as well as alcohol consumption (promotion), and obesity (promotion). Pollution, however, has not been linked to bowel cancers.

Liver

The most common risk factor for liver cancer is chronic (long-term) infection with hepatitis B virus (HBV) or hepatitis C virus (HCV). These infections lead to cirrhosis of the liver. People infected with both viruses have a high risk of developing chronic hepatitis, cirrhosis, and liver cancer. Cirrhosis is a disease in which liver cells become damaged and are replaced by scar tissue, which in turn is linked with an increased risk of liver cancer. The risk is even higher if they are heavy drinkers (at least 6 standard drinks a day). Alcohol abuse is a leading cause of cirrhosis in the United States, and being very overweight increases the risk of

liver cancer. This is probably because it can result in fatty liver disease and cirrhosis. Type 2 diabetes has been linked with an increased risk as well. Infection with these viruses and alcohol consumption are also linked to behavioral determinants. Environmental agents long recognized as carcinogens for this cancer include *aflatoxins* made by a fungus that contaminates peanuts, wheat, soybeans, ground nuts, corn, and rice. Storage in a moist, warm environment can lead to the growth of this fungus. Exposures to high concentrations of work-related plastic solvents is a risk factor, as are anabolic steroids, male hormones used by some athletes to increase their strength and muscle mass increase risk. Drinking water contaminated with naturally occurring arsenic, such as that from some wells, over a long period of time increases the risk of some types of liver cancer, though the arsenic species responsible for elevating liver cancer risk is not common in the U.S. and is not present in domestic or environmental water at the prison.

Prostate

The most important risk factors for prostate cancer are *age* and *race*. While only one in 10,000 men under age 40 will be diagnosed with the cancer, the rate increases dramatically with age so that one in 15 men in their 60s will be diagnosed. African American men are approximately 60 percent more likely to develop prostate cancer in their lifetime than Caucasian or Hispanic men, and there were 26 percent more Black prisoners than whites leading to larger numbers of cases. Men don't always demonstrate special symptoms leading to their diagnosis, rather screening reveals large numbers of cases and can affect the disease rate in a population. In Pennsylvania as elsewhere other factors contributing to risk include family history where men are twice as likely to develop the disease if an immediate blood relative, such as a father or brother, had prostate cancer. Other risk factors include a diet high in saturated fat, as well as obesity, and use of testosterone therapy. The ambient environment including pollution is not recognized as a source of carcinogens though.

Lymphomas

Four lymphomas were identified from the Pennsylvania Cancer Registry among inmates; two cases of Hodgkin's disease (HD) or Hodgkin's lymphoma and two cases of non-Hodgkin's lymphoma (NHL). Neither of these types is linked to ambient pollution. Risk factors for Hodgkin's lymphoma or Hodgkin's disease (HD) are largely unknown. There is no established association with tobacco use, diet, or alcohol, though hormones may play a role. An infectious

origin has been suggested, particularly the role of the DNA Epstein-Barr virus (EBV), and the risk of HD is somewhat higher in people who have been infected with it. However, the virus' role still is uncertain, though the HIV is a risk factor for NHL. Studies of lymphomas show little or no evidence to support the idea they are caused by toxic waste sources.

Leukemia

Leukemia have received much attention when concerns arise about environmental toxins. There are several established agents for the leukemia, however they account for a small proportion of all cases. The cause(s) of most leukemia cases remain largely unknown. The role of viruses in animals has been established for a long time. More recently, the human T-cell lymphotropic virus (HTLV-1), the AIDS virus, and the Epstein-Barr virus (EBV) have been shown to cause some adult T-cell leukemia. In addition, therapeutic agents such as chemotherapy (alkylation agents) can cause leukemia. Several sources of x-radiation have been shown to cause the disease, however doses must be relatively large; as with diagnostic x-rays and long-term exposures to high levels of radiation. For non-ionizing radiation, there are no proven excesses from electromagnetic fields. Cigarette smoking does support an elevated risk of leukemia, but alcohol consumption data is conflicting. In addition some genetic syndromes increase lifetime risk.

Several types of cancer aren't discussed in this report as little is known about their etiology. It would not be constructive to ascribe a cause without a body of supporting evidence from recognized scientific institutions such as the National Cancer Institute, Centers for Disease Control and Prevention, National Institute of Medicine, or U.S. Preventative Services Task Force.

While controlling large amounts of fly ash is an important environmental management issue and populations can be vulnerable to its irritant effects on the skin and body membranes, including the respiratory tract, the medical and epidemiological literature does not support the idea that exposure to this material creates an excess cancer risk. Its inflammatory effects on people from its physical properties and interactions with chemical constituents do not increase the risks of cancer, and interactions with chemical constituents including toxic hydrocarbons also have not been shown to increase cancer risks.

Summary

The purpose of this study was to: 1) understand the types of cancer affecting men at the prison, 2) evaluate the rates of occurrence, and 3) assess whether the ambient environment of the facility could have contributed to the incidence over time. The creation of rates was based on the premise that any stay at the SCI facility could elevate an inmate's risk and would be measureable if inmates were followed long enough. Follow-up is important to obtain most reliable measure of risk (rates), because cancers have very long "incubation" periods and since small numbers of inmates were studied. A limitation of this study was the inability to link inmate identifiers to the cancer registry over a longer period of time. It would have been most effective to trace all inmates over time by linking them to the PCR as well as other cancer registries in neighboring states where they might have resided, in order to obtain the best measure cancer occurrence after leaving SCI Fayette. For these reasons the determination of rates in this study is less precise. Just the same this examination of incidence in these men provides an important picture of the magnitude of cancer in the prison population.

The Department of Health is sensitive to concerns about disease clusters in all communities, including residents of SCI Fayette. In an effort to provide the most current assessment of the cancer burden and risk, the types of cancer, the relative frequencies and incidence rates were examined through 2012. This *study* was not designed to be an etiological investigation; to determine whether a particular pollutant in the environment is a carcinogen. Answers to this question require analytical designs that are beyond the scope of work of the PADOH. Studies of etiology are the responsibility of the National Cancer Institute (NCI), and the Centers for Disease Control (CDC), and universities. These institutions have already been important resources for examining the potential for fly ash to cause cancer.

This study provides objective measures of cancer incidence rates compared to all men in Pennsylvania. *Based on the types of cancer observed and the rates, there isn't an indication the environment contributes to the risk, and there are no environmental data demonstrating that there are human exposures to significant levels of carcinogens that could increase the cancer risk.*

REFERENCES

McDaniel D, Grote B. 2014. *No Escape: Exposure to Toxic Coal Waste at State Correctional Institution*. Abolitionists, Pittsburgh.

Pennsylvania Department of Corrections. 2014. *Demographic Profile of Inmates on December 31 - Calendar Years 2012 and 2013*. Harrisburg, Pa.

Wikipedia. *Fly Ash*. 2014. www.n.wikipedia.org/wiki/Fly_ash> Cached.

American Coal Ash Association www.aaaa-usa.org.

U.S. Environmental Protection Agency. 2007. *Human and Ecological Risk Assessment of Coal Combustion Wastes*. Prepared for the US EPA by RTI, Research Triangle Park, August 6, 2007.

Meij R., 2003. "Status report on the health issues associated with pulverized fuel ash and fly dust." Report 50131022-KPS/MEC 01-6032, KEMA Power Generation and Sustainables. Arnhem, Netherlands.

World Health Organization. *International Classification of Diseases for Oncology. Third Edition*. Geneva, Switzerland: 2000.

Lilienfeld AM. *Principles of Epidemiology*. 1976. Oxford University Press, New York.

Armitage P. 1974. *Statistical Methods in Medical Research*, New York: John Wiley and Sons.

Rohlf F, Sokal R. 1969. *Statistical Tables*. San Francisco: W.H. Freeman and Co.

United States. Pennsylvania Department of Health. *Epidemiologic Query and Mapping System (EpiQMS - www.health.state.pa.us/stats)*. Pennsylvania Department of Health, Sept. 2003. Web. Access date: 2014.

United States Public Health Service. Office of the Surgeon General. 1964. "The Health Consequences of Smoking; A Public Health Service Review". DHEW, PHS Pub. No. 1103, Washington.

U.S. Department of Health and Human Services. National Cancer Institute. *Leukemias*. www.cancer.gov/cancertopics/types/leukemia. 2014.

U.S. Department of Health and Human Services. National Cancer Institute. *Lymphomas*. www.cancer.gov/cancertopics/types/lymphomas. 2014.

U.S. Department of Health and Human Services. National Cancer Institute. *ColonRectum*. www.cancer.gov/cancertopics/types/colorectum. 2014.

London T, McGlynn K. "Liver Cancer". In: Schottenfeld D, Fraumeni JF Jr., eds. 1996. *Cancer Epidemiology and Prevention, Second Edition*. Oxford University Press, New York.

REFERENCES – continued

Scherer P, Mueller N. "Non-Hodgkin's lymphomas". In: Schottenfeld D, Fraumeni JF Jr., eds. 1996. *Cancer Epidemiology and Prevention, Second Edition*. Oxford University Press, New York.

Mayo Clinic. *Hodgkin's lymphoma*. 2014. www.mayoclinic.org/diseases-conditions/hodgkins-lymphoma/basics/causes/con-2002779

Linet M, Cartwright R. "The leukemias." In: Schottenfeld D, Fraumeni JF Jr., eds. 1996. *Cancer Epidemiology and Prevention, Second Edition*. Oxford University Press, New York.

Table 1

Distribution of Incident Cancer Cases by Type, Male Inmates SCI-Fayette Facility
Diagnosed from 2003 to 2012 and Male PA Residents from 2007 to 2009

	<u>SCI Fayette</u>		<u>Pennsylvania</u>	
	<u>[2003-2012]</u>		<u>[2007-2009]</u>	
	Percent	Cases	Percent	Cases
All Cancers	100.0	45	100.0	114,630
Mouth & Pharynx	0.0	0	2.9	3,350
Esophagus	0.0	0	1.7	1,968
Stomach	2.2	1	1.8	2,020
Colon - Rectum	6.7	3	9.8	11,200
Liver	8.9	4	2.0	2,248
Pancreas	2.2	1	2.5	2,835
Larynx	2.2	1	1.3	1,451
Bronchus & Lung	13.3	6	14.7	16,894
Malignant Melanoma - Skin	0.0	0	3.9	4,437
Kidney	0.0	0	4.0	4,593
Urinary Bladder	8.9	4	7.6	8,663
Prostate	26.7	12	27.0	30,990
Brain & Nervous System	2.2	1	1.4	1,590
Thyroid	0.0	0	1.5	1,768
Non-Hodgkin's Lymphoma	4.4	2	4.3	4,917
Hodgkin's Lymphoma	4.4	2	0.6	684
Leukemia	4.4	2	2.7	3,146
Other & Unknown	13.3	6	11.9	11,876

Pennsylvania Department of Health

Table 2
Observed* and Expected** Cancer Cases, and Risk Ratios [SIR]
Inmates of Pennsylvania State Correctional Facility Fayette, for 2003-2012

CANCER	Cases		Risk Ratio [SIR]	
	Observed	Expected	Obs. / Exp. Cases	
	<u>A</u>	<u>B</u>	<u>A // B</u>	<u>Sig.</u>
All Cancers	<u>45</u>	64.70	<u>0.70</u>	<i>sig</i>
Mouth & Pharynx	0	2.29	0	ns
Esophagus	0	0.84	0	ns
Stomach	1	1.33	0.75	ns
Colon-Rectum	3	5.85	0.51	<i>sig</i>
Liver	4	2.63	1.52	<i>sig</i>
Pancreas	1	1.49	0.67	ns
Larynx	1	1.40	0.71	ns
Bronchus & Lung	6	7.93	0.76	<i>sig</i>
Malig. Melanoma-Skin	0	1.32	0	ns
Kidney	0	3.15	0	ns
Urinary Bladder	4	2.27	1.76	ns
Prostate	12	19.26	0.62	<i>sig</i>
Brain & Nervous Sys.	1	1.08	0.93	ns
Thyroid	0	1.11	0	ns
Non-Hodgkin's Lymphoma	2	3.11	0.64	ns
Hodgkin's Lymphoma	2	0.75	2.67	ns
Leukemia	2	1.51	1.32	ns
Other & Unknown	6	-	-	

* Observed based on incidence during or after prison stay.

** Based on standardized rates; adjusted by age, race/Hispanic.

sig Rate statistically significant.

ns Rate not statistically significant.

Pennsylvania Department of Health.

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

UNIONTOWN NEWSPAPERS, INC., d/b/a/
THE HERALD STANDARD; AND
CHRISTINE HAINES,

Petitioners,

v.

No. 66 M.D. 2015

PA DEPARTMENT OF CORRECTIONS,

Respondent

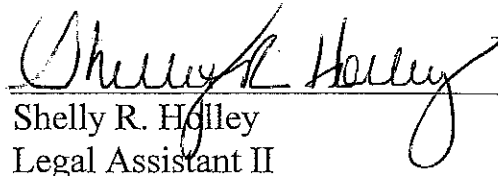
CERTIFICATE OF SERVICE

I hereby certify that I deposited in the U.S. Mail a true and correct copy of the foregoing *Answer and New Matter* to be served upon the following person(s) in the manner indicated below:

Service by first-class mail
addressed as follows:

Charles Kelly, Esq.
Saul Ewing
One PPG Place, Suite 3010
Pittsburgh, PA 15222

Kathleen A. Higgins, Esq.
Office of Open Records
Commonwealth Keystone Building
400 North Street, 4th Floor
Harrisburg, PA 17120-0225


Shelly R. Holley
Legal Assistant II

Pennsylvania Department of Corrections
Office of Chief Counsel
1920 Technology Parkway
Mechanicsburg, PA 17050

Dated: June xx, 2015

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

UNIONTOWN NEWSPAPERS, INC., d/b/a/
THE HERALD STANDARD; AND
CHRISTINE HAINES,

Petitioners,

v.

PA DEPARTMENT OF CORRECTIONS,

Respondent

No. 66 M.D. 2015

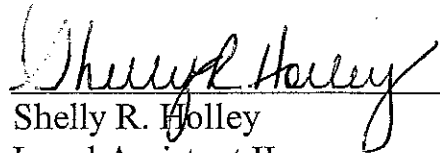
CERTIFICATE OF SERVICE

I hereby certify that I deposited in the U.S. Mail a true and correct copy of the foregoing *Answer and New Matter* to be served upon the following person(s) in the manner indicated below:

Service by first-class mail
addressed as follows:

Charles Kelly, Esq.
Saul Ewing
One PPG Place, Suite 3010
Pittsburgh, PA 15222

Kathleen A. Higgins, Esq.
Office of Open Records
Commonwealth Keystone Building
400 North Street, 4th Floor
Harrisburg, PA 17120-0225


Shelly R. Holley

Legal Assistant II
Pennsylvania Department of Corrections
Office of Chief Counsel
1920 Technology Parkway
Mechanicsburg, PA 17050

Dated: June 17, 2015

RECEIVED

JUN 17 2015

OFFICE OF OPEN RECORDS

June 17, 2015

Michael F. Krimmel, Esquire
Deputy Prothonotary and Chief Clerk
Pennsylvania Judicial Center
601 Commonwealth Avenue, Suite 2100
P.O. Box 69185
Harrisburg, PA 17106-9185

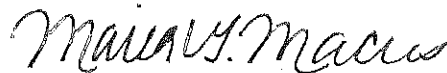
Re: *Uniontown Newspapers, Inc. et al. v. Pa. DOC*
No. 66 M.D. 2015

Dear Mr. Krimmel:

Please find enclosed for filing in the above-captioned matter my entry of appearance for the Department of Corrections and the Department's answer/new matter. I have enclosed copies to be time-stamped and returned to me by way of the messenger.

Thank you for your attention to this matter.

Sincerely,



Maria G. Macus
Assistant Counsel

Enclosures

cc: Charles Kelly, Saul Ewing LLP, One PPG Place, Suite 3010, Pittsburgh, PA 15222, (w/enclosures)
Kathleen A. Higgins, Esq., Office of Open Records, Commonwealth
Keystone Building, 400 North Street, 4th Floor, Harrisburg, PA 17120-0225
File