

RESPONSE TO THE 2023 AUDIT REPORT OF
OTAY MESA ENERGY CENTER
(AUDIT NUMBER GA2023-21OM)

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**OTAY MESA ENERGY CENTER'S
RESPONSE TO THE 2023 AUDIT REPORT OF OTAY MESA ENERGY CENTER
(AUDIT NUMBER GA2023-21OM)**

I. INTRODUCTION

Otay Mesa Energy Center (“OMEC”)¹ appreciates the opportunity to respond to the *California Public Utilities Commission (“CPUC”) Audit Findings of Otay Mesa Energy Center September 18-September 22, 2023* (“Audit Report”). The Audit Report addresses the OMEC’s compliance with General Order 167-B (“GO 167”), including related Operation, Maintenance, and Logbook Standards. The Audit Report presents “Findings” from the audit conducted by the Commission’s Electric Safety and Reliability Branch (“ESRB”) on September 18 through September 22, 2023 (the “Audit”). As part of the Audit, OMEC responded to numerous information and data requests from ESRB. OMEC produced several hundreds of documents in advance of the Audit and spent multiple days with the ESRB team at the facility, including reviewing additional voluminous documents and data on-site.

The Audit Report contains 18 Findings, which allege potential violations of GO 167 requiring corrective action. While OMEC disagrees that any of these Findings constitute potential violations of GO 167, OMEC has taken appropriate action to address the issues identified in the Audit Report. None of the purported issues identified in the Findings pose a significant risk to safety or reliability.

The purpose of GO 167 is:

to maintain and protect the public health and safety . . . , to ensure that electric generating facilities are effectively and appropriately maintained and efficiently operated, and to ensure electrical service reliability and adequacy.²

In addition to the Operation, Maintenance, and Logbook Standards in GO 167, the California Electric Generation Facilities Standards Committee (“Committee”) has published recommended guidelines for Generating Asset Owners seeking to comply with GO 167 (“GO 167 Guidelines”).³ The Committee encouraged Generating Asset Owners to use discretion when implementing the GO 167 Guidelines at their unique facilities, and explained that it “does not intend the [GO 167 Guidelines] to be enforceable [because] there may be reasonable ways of meeting a particular [GO

¹OMEC’s participation in this GO 167 audit is purely voluntary and OMEC expressly reserves all rights to assert any privilege or objection to additional requests for information. OMEC also expressly reserves all rights to challenge the legality and applicability of California Public Utilities Code Section 761.3 and the implementation of such statute by the Commission or any other agency or instrumentality of the State of California.


² GO 167, § 1.

³ See Operation Standards and Recommended Guidelines for Generating Asset Owners, Adopted by the California Electric Generation Facilities Standards Committee on October 27, 2004 (the “Guidelines”).


167 Standard] that do not follow every provision of the associated guidelines.”⁴ The Committee also cautioned that “failure to meet a guideline should not be taken, per se, as a failure to meet the associated [GO 167 Standard].”⁵

OMEC believes that it appropriately uses its discretion to implement operation, maintenance and safety programs that work most effectively given the OMEC’s unique design and permit limitations. Many of the Findings in the Audit Report are not violations of GO 167 because they relate to issues in which OMEC’s management has exercised discretion to implement predictive and preventive maintenance, safety mechanisms, and programs which are appropriate for OMEC, consistent with prudent industry practices and standards, and consistent with the general guidelines set forth in the Operation and Maintenance Standards.

Consistent with the GO 167 Maintenance Standards (“MS”), OMEC prioritizes maintenance activities with regard to the impact on safety, reliability, and efficiency,⁶ and works closely with Original Equipment Manufacturers (“OEMs”) and outside consultants.⁷




Corrective, preventive, and predictive maintenance are also a critical part of OMEC’s overall safety program. OMEC has established a work environment and implemented policies and procedures that foster a culture of safety.



OMEC takes a systematic approach to environmental and safety training and has an established training program to reinforce safety practices and expected behavior that all workers are required to complete.

In addition, OMEC has established procedures to ensure safety-related information is timely disseminated and all employees have access to such information.



⁴ *Id.* at 7.

⁵ *Id.*

⁶ See MS-7, Assessment Guideline A.

⁷ See MS-7, Assessment Guideline D.

[REDACTED]

To ensure OMEC and all Calpine power plants continue to operate safely, [REDACTED]

[REDACTED]

Notwithstanding the tremendous amount of time, effort, and resources that are committed to ensuring OMEC operates in a safe, reliable, and efficient manner, OMEC also promotes an environment of continuous improvement and engages in an ongoing and systematic effort to update and further enhance overall safety, operations, and maintenance at the OMEC. It is within this context that OMEC has reviewed the Audit Report.

OMEC has completed or has scheduled corrective maintenance to address issues raised in the Audit Report. In all cases, however, none of the issues addressed in the Audit Report posed a significant risk to worker safety or OMEC's reliability.

II. RESPONSE TO FINDINGS

Response to Finding 1: The Plant effectively communicates, manages, and prepares for emergencies.

OMEC has numerous systems in place to ensure that it effectively communicates, manages and prepares for emergencies. [REDACTED]

[REDACTED]

[REDACTED] Given OMEC's comprehensive safety program in place and its steps to further improve communication with emergency responders, it does not believe this finding constitutes a violation of GO 167.

Response to Finding 2: The Plant ensures the provision of emergency response equipment.

The Audit Report notes a discrepancy in the location of a trauma bag compared to the location noted in the ERP.¹¹ While the ERP states that the trauma bag is located in the [REDACTED] during the audit emergency response equipment was located just outside [REDACTED] in the labelled cabinet with the automated external defibrillator ("AED"). In response to the audit, OMEC has added a new trauma bag to [REDACTED]¹² Given that there was emergency response equipment readily available and OMEC updated its emergency response equipment, this finding should not constitute a violation of GO 167.

Response to Finding 3: The Plant ensures the provision and operation of effective emergency lighting.

The Audit Report notes that there were emergency lights [REDACTED] [REDACTED] that needed to be replaced.¹³ OMEC conducts routine inspections of its facilities and equipment to ensure personnel safety and emergency preparedness. Depending upon

⁸ Audit Report, at 1-2.

⁹ See folder, titled "Response to Finding 1."

¹⁰ See folder, titled "Response to Finding 1."

¹¹ Audit Report, at 2.

¹² See folder, titled "Response to Finding 2."

¹³ Audit Report, at 3-4.

the timing of an audit, there will likely always be ongoing maintenance with respect to various equipment and systems. Such ongoing maintenance is not an indication of a violation of GO 167. OMEC has replaced or fixed all of the identified lights.¹⁴ OMEC has also updated its [REDACTED] to list each individual emergency light location and quantity of lights in each location.¹⁵

Response to Finding 4: OMEC has improved its processes to review and recertify its operational standards.

The Audit Report notes that OMEC had not completed its [REDACTED]
[REDACTED]¹⁶ OMEC is committed to continuously improving its processes and is working on implementing [REDACTED]

Accordingly, the Plant has updated both standards [REDACTED]¹⁷ It has also completed a refresher training in [REDACTED]¹⁸ While the updates to the standards only included slight edits to the appendices and general formatting corrections, OMEC's actions are intended to ensure [REDACTED] is completed regardless of the magnitude of change.

Response to Finding 5: The Plant conducts maintenance in an effective and efficient manner to ensure equipment performance and reliable operations.

The Audit Report identifies [REDACTED] failure incidents on the [REDACTED] and describes them as repetitive failures.¹⁹ However, the incidents identified by the Audit Report encompass two separate and distinct issues, which were both addressed timely and appropriately. As discussed during the audit, an investigation into the cause of the [REDACTED] failures was performed in 2019. The results of the investigation indicated that the cause of the failure was due to [REDACTED] The cause of the [REDACTED]

[REDACTED] This caused the [REDACTED]

[REDACTED] The site implemented a [REDACTED]

[REDACTED] This change proved successful, as the site did not experience failures for the next four years.

¹⁴ See folder, titled "Response to Finding 3."

¹⁵ See folder, titled "Response to Finding 3."

¹⁶ Audit Report, at 4-5.

¹⁷ See folder, titled "Response to Finding 4."

¹⁸ See folder, titled "Response to Finding 4."

¹⁹ Audit Report, at 5-6.

In [REDACTED] additional and unrelated [REDACTED] incidents occurred. The Plant investigated the cause of the failures and determined that it was [REDACTED]. In response OMEC has implemented [REDACTED].²⁰ Given that these two incidents had separate and distinct causes and OMEC appropriately implemented effective changes, this finding should not constitute a violation of GO 167.

Response to Finding 6: The Plant conducts routine maintenance and inspections to ensure effective equipment performance and compliance with environmental regulatory regulations.

The Audit Report identifies oil leaks at the cooling fan gear boxes of the [REDACTED]. The Plant routinely [REDACTED]. Thus, oil leaks are typically identified and addressed promptly. These leaks are generally attributable to [REDACTED] that were repaired. The Plant has [REDACTED].²² Further, OMEC has implemented countermeasures to address any future leaks by implementing [REDACTED] to inspect the [REDACTED].²³ OMEC has also developed and implemented a new disposal job plan for any future impacted material and soil.²⁴

The [REDACTED] does not have an active leak. Instead, the residual oil seen in Figure 3 of the Audit Report is staining from a prior leak/seepage. OMEC has [REDACTED].²⁵ In compliance with GO 167, OMEC prioritizes maintenance activities with regard to the impact on safety, reliability, and efficiency. For all the reasons explained above, the items identified in this finding did not present any serious safety or reliability risk and thus should not constitute a violation of GO 167.

Response to Finding 7: OMEC continuously improves the timely and effective maintenance and repair of its equipment.

The Audit Report identifies water leakages from the [REDACTED].²⁶ Both leaks have been corrected. The [REDACTED].

²⁰ See folder, titled “Response to Finding 5.”

²¹ Audit Report, at 6-8.

²² See folder, titled “Response to Finding 6.”

²³ See folder, titled “Response to Finding 6.”

²⁴ See folder, titled “Response to Finding 6.”

²⁵ See folder, titled “Response to Finding 6.”

²⁶ Audit Report, at 8-9. Please note: The valve identified in the Audit Report as, “Intermediate Pressure Feed Water Block Valve CNS-V06-2702,” is a low-pressure valve.

[REDACTED]²⁷ As an extra precautionary measure, removable caps have been installed on [REDACTED]²⁸ OMEC was also able to [REDACTED] packing.²⁹ Although water leakages were observed, there was no pooling of water on the equipment or ground. Accordingly, this finding should not constitute a GO 167 violation.

Response to Finding 8: The Plant ensures all required personnel are trained and qualified to operate forklifts in support of reliable plant operations.

The Audit Report states that nine employees' forklift certifications were expired and thus the Plant was not in compliance with certain OSHA standards.³⁰ However, there is no requirement that all personnel need to be forklift certified. Instead, the requirement is that any personnel that operates a forklift needs to be properly trained and evaluated. OMEC provided a list of its employees that were forklift certified during its initial data request response on August 11, 2023.³¹ The list also specifically noted that those employees with expired certifications would need to [REDACTED]

[REDACTED] Since only personnel with valid certifications were operating forklifts, this finding does not present any safety or reliability risks. Despite there being no requirement that all site personnel be forklift certified, the Plant took extra steps and [REDACTED]

[REDACTED]² Further, the Plant also created [REDACTED]³³ As OMEC had numerous forklift certified employees and no forklift were operated by uncertified personnel, this finding does not constitute a violation of GO 167.

Response to Finding 9: The Plant reported outages to the California Public Utilities Commission (CPUC).

The Audit Report states that OMEC failed to report an outage in [REDACTED]³⁴ However, OMEC reported both outages to the CPUC through the Power Plant Outage Reporting ("PPOR") web portal. For the [REDACTED] event, OMEC timely reported the outage and continued to update the CPUC on [REDACTED]³⁵ Section 10.4 of GO 167 relates to reporting safety-related incidents.³⁶ As the [REDACTED] was not a safety-

²⁷ See folder, titled "Response to Finding 7."

²⁸ See folder, titled "Response to Finding 7."

²⁹ See folder, titled "Response to Finding 7."

³⁰ Audit Report, at 9-10.

³¹ See August 11, 2023 Response 21.

³² See folder, titled "Response to Finding 8."

³³ See folder, titled "Response to Finding 8."

³⁴ Audit Report, at 10.

³⁵ See folder, titled "Response to Finding 9."

³⁶ GO 167, Section 10.4 ("...a Generating Asset Owner shall report to the Commission's emergency reporting web site any *safety-related* incident. . .")(emphasis added).

related incident, OMEC did not report it under Section 10.4. For the second [REDACTED] event, after discovering that a report had not been made, OMEC reported the outage late, in [REDACTED] through the PPOR web portal.³⁷ Given OMEC timely and correctly reported the event and reported the [REDACTED] event upon discovery of the error, OMEC does not believe this finding should constitute a violation of GO 167.

Response to Finding 10: The Plant corrected washed-out and damaged [REDACTED] to ensure physical security.

The Audit Report identifies sections of [REDACTED] that are washed-out or damaged.³⁸ OMEC takes physical security of the site seriously, particularly due to its proximity to the US-Mexico border. In fact, OMEC has coordinated with the U.S. Border Patrol to identify and address any vulnerabilities in its physical security. The Plant has taken a variety of steps to mitigate such security risks, [REDACTED]. The areas identified in the Audit Report are due to erosion caused by weather and animals. While OMEC has not had any intrusions due to this issue, it promptly repaired the areas during the audit [REDACTED].³⁹ Additionally, the Plant will conduct [REDACTED] to address any future erosion.⁴⁰ Ongoing maintenance due to normal wear and tear is not an indication of a violation of GO 167.

Response to Finding 11: The Plant's hot work permit has been updated to comply with NFPA 51B.

The Audit Report notes that OMEC's hot work permit, specifying a 30-minute post-work fire watch duration, needs to be updated to a 1-hour fire watch duration.⁴¹ OMEC has updated its hot work permit to specify a 1-hour fire watch duration.⁴² OMEC has also ensured that personnel have been trained in accordance with the updated hot work permit.⁴³

Response to Finding 12: The Plant has ensured timely and routine varnish analysis for its [REDACTED]

The Audit Report identifies different frequencies of varnish analysis [REDACTED]

[REDACTED]⁴⁴ Additionally, there are other protective measures to address varnish concerns. For example, [REDACTED]

[REDACTED] While these redundancies address

³⁷ See folder, titled "Response to Finding 9."

³⁸ Audit Report, at 10-12.

³⁹ See folder, titled "Response to Finding 10."

⁴⁰ See folder, titled "Response to Finding 10."

⁴¹ Audit Report, at 12.

⁴² See folder, titled "Response to Finding 11."

⁴³ See folder, titled "Response to Finding 11."

⁴⁴ Audit Report, at 12.

reliability concerns, OMEC has also created [REDACTED] to ensure regular varnish testing.⁴⁵ Given the redundant processes, this finding should not constitute a violation of GO 167.

Response to Finding 13: The Plant reviewed communication procedures and equipment use during emergency events with site personnel.

The Audit Report identifies the need for the Plant to conduct [REDACTED] evacuation drills and appropriately respond to any critiques from the drills.⁴⁶ OMEC has created an [REDACTED] to ensure it completes its evacuation drills.⁴⁷ [REDACTED] Additionally, OMEC is evaluating potential changes to [REDACTED] in response to a critique in the [REDACTED] drill.⁴⁸ Additionally, given existing redundancies, [REDACTED] update may not be the best approach. The [REDACTED] [REDACTED] to allow for effective communication. OMEC highlighted the importance of [REDACTED] during emergencies during its most recent [REDACTED].

Response to Finding 14: The [REDACTED] fire suppression system is compliant with GO 167.

As requested by ESRB, OMEC intends to add labels to the [REDACTED] fire suppression system. [REDACTED] Thus, OMEC has generated [REDACTED].⁵⁰ While OMEC has accommodated ESRB's request, it disagrees that such labels are necessary for a system to be compliant with GO 167. The GO 167, Operation Standard ("OS") 28 language identified in the Audit Report is from the GO 167 Guidelines, which are only intended to be guidelines for generating asset owners.⁵¹ The Commission did not intend for the "guidelines to be enforceable" and it further states that the "failure to meet a guideline should not be taken, per se, as a failure to meet the associated standard."⁵² The GO 167 Guidelines provide flexibility to allow each individual plant to develop plans, procedures and training programs. Further, the concerns identified in the Audit Report regarding non-Plant personnel and contractors inadvertently interfering with the fire suppression piping during maintenance are more effectively addressed through ensuring that any contractors are properly trained and qualified to perform the work they are tasked with and through the Plant's [REDACTED] process.

⁴⁵ See folder, titled "Response to Finding 12."

⁴⁶ Audit Report, at 14.

⁴⁷ See folder, titled "Response to Finding 13."

⁴⁸ See folder, titled "Response to Finding 13."

⁴⁹ See folder, titled "Response to Finding 13."

⁵⁰ See folder, titled "Response to Finding 14."

⁵¹ Audit Report, at 14.

⁵² Guidelines, at 7.

Response to Finding 15: The Plant actively monitors and maintains the operation of [REDACTED] cooling fans.

The Audit Report states that a cooling fan on [REDACTED] and on [REDACTED] were non-operational at the time of the audit. OMEC had already identified the issue on the [REDACTED] cooling fan prior to the audit and had scheduled the repair work.⁵⁴ The repair was completed during the week of the audit.⁵⁵ The issue with the cooling fan on [REDACTED] is a recent issue that likely would have been identified during the next regular [REDACTED] inspections. [REDACTED]⁵⁶

As discussed above, there will always be ongoing maintenance with respect to various equipment and systems. The existence of repairs, scheduled repairs, and other routine maintenance is not a violation of GO 167. Indeed, such work orders illustrate the OMEC's effective work order management system, which results in the appropriate prioritization and completion of preventive maintenance and corrective repairs.

Response to Finding 16: The Plant replaces and maintains proper signage and labeling.

The Audit Report notes certain missing or faded labels.⁵⁷ Depending upon the timing of an audit, there will likely always be ongoing maintenance with respect to various Plant equipment and systems. Such ongoing maintenance includes refreshing faded signs that result from normal wear and tear and is not an indication of a violation of GO 167.

OMEC has replaced the faded label on the chemical container identified in Figure 14 of the Audit Report.⁵⁸ The containers identified in Figure 13 of the Audit Report held a solvent-free detergent, [REDACTED].⁵⁹ The detergent is considered non-hazardous and does not require any special handling or reporting if spilled. The detergent was transferred to [REDACTED] and the containers removed. Although the [REDACTED] identified in Figure 12 of the Audit Report, is not easily accessible, as it requires a ladder to access, OMEC added a high voltage label to the unit.⁶⁰

Lastly, OMEC intends to continue to build upon its maintenance processes. Thus, the Plant has implemented [REDACTED].⁶¹

⁵³ Audit Report, at 16-17.

⁵⁴ See folder, titled "Response to Finding 15."

⁵⁵ See folder, titled "Response to Finding 15."

⁵⁶ See folder, titled "Response to Finding 15."

⁵⁷ Audit Report, at 18-19.

⁵⁸ See folder, titled "Response to Finding 16."

⁵⁹ See folder, titled "Response to Finding 16."

⁶⁰ See folder, titled "Response to Finding 16."

⁶¹ See folder, titled "Response to Finding 16."

Response to Finding 17: The Plant actively monitors and maintains equipment in an effective and efficient manner.

The Audit Report identifies oil staining on the [REDACTED].⁶² The oil stains on the [REDACTED] are old and are not due to an active leak. The Plant has since cleaned up the oil stain and will continue to monitor the area during its [REDACTED].⁶³ In addition to the [REDACTED]

[REDACTED].⁶⁴ Given the lack of an active leak and the redundant systems in place to identify any future active leaks, this finding does not present a significant safety or reliability issue and thus is not a violation of GO 167.

Response to Finding 18: OMEC timely reviewed and provided all requested documents prior to the audit or made documentation available on site during the audit.

The Audit Report states that OMEC did not provide all the requested documents.⁶⁵ As part of the audit, OMEC responded to 82 data requests from ESRB and spent multiple days with the ESRB team at the facility, including reviewing additional documents and data on site. Out of the 79 data requests referenced in the Audit Report,⁶⁶ OMEC provided documentation or responses to 61 of the data requests prior to the audit, an extensive process requiring the review and production of over 6,500 pages of electronic documents. Documentation for the remaining 18 data requests were either subject to third-party restrictions, too voluminous and burdensome to provide digitally, or still being compiled by the Plant; and thus, were made available for review on site during the Audit.

In addition to significant documentation provided prior to the audit, OMEC's response on August 11, 2023, also included narrative responses to certain requests when appropriate, such as for any request that was inapplicable to OMEC's equipment or systems (e.g., there are no [REDACTED] and thus no such reports). Additionally, OMEC's response highlighted certain requests that were overly burdensome to provide electronically due to the volume of information and thus made such information available to ESRB staff during the audit. As an example, [REDACTED]

⁶² Audit Report, at 19-20.

⁶³ See folder, titled "Response to Finding 17."

⁶⁴ See folder, titled "Response to Finding 17."

⁶⁵ Audit Report, at 20.

⁶⁶ ESRB's initial data request included 82 requests and denoted three requests that could be provided on-site: computer work order demonstration, safety orientation and logbooks. Accordingly, the Audit Report's 79 reference reflects the total requests minus the three denoted for on-site.

OMEC strives to provide as much information as possible prior to the audit and given the voluminous nature of the initial data request, it believes that it has provided sufficient information. Each document needs to be collected and reviewed within the four-week time frame between the data request and deadline. To put in perspective the impact of the volume of the request coupled with the short timeframe, the OMEC team had to review 300+ pages every day to provide the documents. Such calculation also does not include the hundreds of pages made available on site nor the hundreds of pages provided in supplemental responses. [REDACTED]

As highlighted in Table 1 below, the requests identified as unsubmitted in the Audit Report have already been provided to ESRB through the initial document requests responses, supplemental responses, and responses to post-audit requests or were made available on site for ESRB's review during the Audit. Additionally, as mentioned above, many of the documents provided for review on site were due to third-party restrictions on re-production or were too voluminous and burdensome to provide digitally. Given the significant amount of information provided by OMEC during the course of the audit, this finding does not constitute a violation of GO 167. OMEC will continue to provide as much information possible in the time frame requested.

Table 1

Data Request(s) Claimed as Unsubmitted	Response to Audit Remark(s)
Request 10: List of all CPUC Reportable Incidents (last 5 years)	Narrative response provided on August 11, 2023. [REDACTED]
Request 11: Root Cause Analyses of all Reportable Incidents (if any)	Narrative response provided on August 11, 2023. [REDACTED]
Request 14: Insurance Report / Loss Prevention / Risk Survey (last 3 years)	Narrative response provided on August 11, 2023, and documents made available for onsite review
Request 40: All Root Cause Analyses	Made available for onsite review
Request 41: Borescope Inspection Reports*(last 2 years)	Provided on August 11, 2023, and reports [REDACTED] were made available for onsite review
Request 42: Maintenance & Inspection Procedures	Made available for onsite review

Request 66: Emergency Stop Valve Test Records on Main Steam Line	Made available for onsite review
Request 72: Polarization Test Records	Made available for onsite review
Request 82: Internal Audit Procedures and all Records	Narrative response provided on August 11, 2023

Appendix A – Corrective Action Plan

Otay Mesa Energy Center Corrective Action Plan

The Otay Mesa Energy Center (“OMEC”) Corrective Action Plan (“Plan”) outlines actions to address items identified in the *California Public Utilities Commission (“CPUC”) Audit Findings of Otay Mesa Energy Center September 18-September 22, 2023* (“Audit Report”). As discussed in detail in OMECs’ *Response to the 2023 Audit Report of Otay Mesa Energy Center (Audit No. GA2023-210M)* (“Response”), OMEC disagrees that any of the Audit Report’s findings constitute “violations” of General Order 167-B (“GO 167”). Voluntary implementation of the corrective actions outlined below does not and should not be construed as assuming such actions are required by GO 167.

Audit Report Findings	Corrective Actions	Complete/Estimated Completion
Finding 1: Emergency Response Plan Records		Complete
Finding 2: First Response Trauma Bag		Complete
Finding 3: Emergency Lights		Complete
Finding 4: Routine Inspection and Maintenance		<ul style="list-style-type: none"> Complete
Finding 5: Routine Inspection and Maintenance		Complete
Finding 6: Oil Leaking		<ul style="list-style-type: none"> Complete Complete Complete
Finding 7: Water Leaking		Complete

Finding 8: Forklift Certifications		Complete
Finding 9: Incident and Outage		Complete
Finding 10: Washed-Out and Damaged [REDACTED]		Complete
Finding 11: Hot Work Permit		Complete
Finding 12: Varnish Analysis Records		Complete
Finding 13: Evacuation Drill Practice and Instructions		Complete
Finding 14: [REDACTED]		[REDACTED]
Finding 15: Non-Operational Cooling Fans		<ul style="list-style-type: none"> Complete [REDACTED]
Finding 16: Deteriorated and Missing Signage		Complete
Finding 17: Oil Leak		Complete
Finding 18: Missing Documents		Complete