

RESPONSE TO THE CPUC AUDIT FINDINGS
OF PASTORIA ENERGY FACILITY L.L.C.

JULY 29 –AUGUST 2, 2024
(AUDIT NUMBER GA2024-07PE)

November 22, 2024

TABLE OF CONTENTS

I. INTRODUCTION	1
II. RESPONSE TO FINDINGS	4
Response to Finding 1: The Plant continuously improves documentation and maintenance processes and procedures.	4
Response to Finding 2: Pastoria will install new varnish removal systems to address recurring critical varnish potential in [REDACTED]	5
Response to Finding 3: Pastoria prioritizes repairs and routine maintenance of equipment.	5
Response to Finding 4: The Plant promptly addressed oil leaks in various equipment.	6
Response to Finding 5: Pastoria promptly locked the [REDACTED] [REDACTED]	7
Response to Finding 6: Pastoria effectively assesses and addresses damaged insulation to maintain the reliable and safe operation of equipment.	7
Response to Finding 7: The Plant has efficiently and effectively identified or repaired its equipment.	7
Response to Finding 8: Pastoria adequately maintains operation of its facilities, equipment, and tools.	7
Response to Finding 9: The Plant continuously strives to improve its maintenance and operational procedures and practices.	8
Response to Finding 10: Pastoria conducts maintenance in an effective and efficient manner to ensure equipment performance and reliable operations.	8
Response to Finding 11: The Plant updated its inspection and maintenance practices of its equipment.	8
Response to Finding 12: The Plant actively monitors hotspots on the [REDACTED] and repairs equipment as needed.	9

Response to Finding 13: The Plant maintains proper signage and labeling.....	9
Response to Finding 14: The Plant removed the outdated signage on the storage cabinet.....	9
Response to Finding 15: Pastoria continuously strives to improve its housekeeping practices.	10
Response to Finding 16: The Plant has correctly labeled NFPA 704 Placards.	10
Response to Finding 17: The Plant has addressed or repaired the damaged equipment.	10
Response to Finding 18: Pastoria has corrected the parameters of the equipment on [REDACTED]	10
APPENDIX A – CORRECTIVE ACTION PLAN	1

PASTORIA ENERGY FACILITY L.L.C.
RESPONSE TO THE 2024 AUDIT REPORT OF PASTORIA ENERGY FACILITY
L.L.C.
(AUDIT NUMBER GA2024-07PE)

I. INTRODUCTION

Pastoria Energy Facility L.L.C.’s (“Pastoria” or the “Plant”)¹ appreciates the opportunity to respond to the *California Public Utilities Commission (“CPUC”) Audit Findings of Pastoria Energy Facility July 29-August 2, 2024* (“Audit Report”). The Audit Report addresses Pastoria’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 July 29 through August 2, 2024 (the “Audit”). As part of the Audit, Pastoria responded to numerous information and data requests from ESRB. Pastoria produced several hundreds of documents in advance of the Audit and spent multiple days with the ESRB team at the facilities, 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 Pastoria disagrees that any of these Findings constitute potential violations of GO 167, Pastoria 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

¹Pastoria’s participation in this GO 167 audit is purely voluntary and Pastoria expressly reserves all rights to assert any privilege or objection to additional requests for information. Pastoria 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.

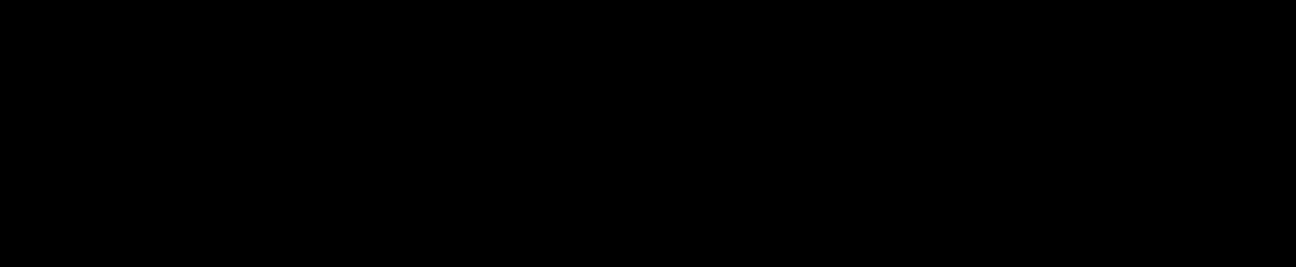
² GO 167, § 1.

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”).

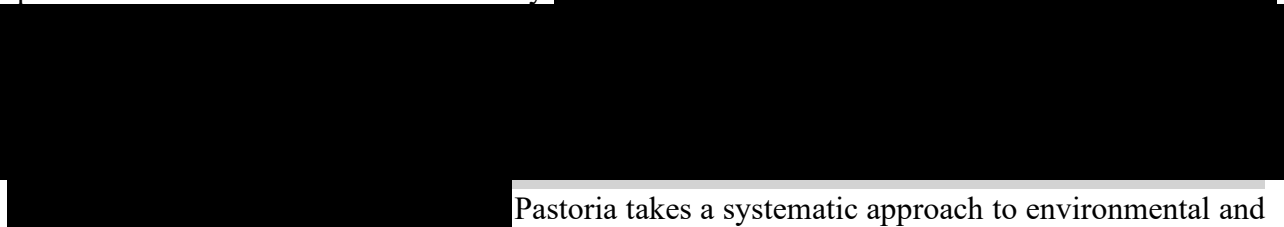
167 Standard] that do not follow every provision of the associated guidelines.”⁴ The Committee also cautioned that “failure to meet a guideline should not be taken, per se, as a failure to meet the associated [GO 167 Standard].”⁵

Pastoria appropriately uses its discretion to implement operation, maintenance and safety programs that work most effectively given Pastoria’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 Pastoria’s management has exercised discretion to implement predictive and preventive maintenance, safety mechanisms, and programs which are appropriate for Pastoria, 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”), Pastoria 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 Pastoria’s overall safety program. Pastoria has established a work environment and implemented policies and procedures that foster a culture of safety.



Pastoria 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, Pastoria 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.

To ensure Pastoria and all Calpine power plants continue to operate safely.



Notwithstanding the tremendous amount of time, effort, and resources that are committed to ensuring Pastoria operates in a safe, reliable, and efficient manner, Pastoria 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 Pastoria . It is within this context that Pastoria has reviewed the Audit Report.

Pastoria 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 Pastoria 's reliability.

II. RESPONSE TO FINDINGS

Response to Finding 1: The Plant continuously improves documentation and maintenance processes and procedures.

The Audit Report notes issues with documentation practices and procedures.⁸ Pastoria supports the continuous improvement of its documentation and maintenance practices. Going forward, Pastoria has refreshed or newly instituted a number of procedures and practices to ensure safety and reliable equipment performance.

1. As noted, the Injury and Illness Prevention Plan (“IIPP”) requires [REDACTED] to be performed and made [REDACTED].⁹ Pastoria instituted a new record keeping practice that ensures [REDACTED] and is committed to the completion of [REDACTED] by the end of [REDACTED].
2. The Audit Report identifies the need for the Plant to consistently conduct and effectively document evacuation drills.¹⁰ Pastoria understands the key role evacuation drills play in ensuring personnel safety, enhancing coordination, maintaining plant reliability, and highlighting the need for facility updates. As such, in [REDACTED] Pastoria rolled out a new preventative maintenance (“PM”) plan for the performance and documentation of comprehensive evacuation drills.
3. As noted, the Plant’s Lockout/Tagout (“LOTO”) Standard requires [REDACTED] of LOTOs.¹¹ To ensure effective record keeping practices in the future, Pastoria has implemented a PM for [REDACTED] that ensures inspection records are maintained.¹²
4. ESRB observed missing [REDACTED] records for the [REDACTED].¹³ In part due to extended outages, Pastoria was unable to conduct testing. However, to better ensure testing is completed, the Plant has implemented a new PM to further ensure effective record keeping practices. Accordingly, this finding should not constitute a violation of GO 167.¹⁴
5. Although ESRB observed an outdated hardcopy of Part 2 of the ERP Plan in the [REDACTED], a digital copy of Part 2 of the ERP Plan is available to [REDACTED]. Nevertheless, [REDACTED]

⁸ Audit Report, at 1-2.

⁹ Audit Report, at 1.

¹⁰ Audit Report, at 1.

¹¹ Audit Report, at 1.

¹² See Folder titled, Response to Finding 1.

¹³ Audit Report, at 2.

¹⁴ See Folder titled, Response to Finding 1.

Pastoria has since replaced the outdated hardcopy of the ERP Plan with most current version.¹⁵

Response to Finding 2: Pastoria will install new varnish removal systems to address recurring critical varnish potential in [REDACTED]

The Audit Report identifies issues with varnish analysis test results for [REDACTED]¹⁶ Pastoria prioritizes the reliable and efficient operation and performance of its facilities. Although [REDACTED] test results indicate a varnish potential, other investigation methods used regularly by Pastoria, such as [REDACTED] did not indicate signs of varnish in the [REDACTED]. Regardless, Pastoria is committed to taking further steps to address the issue. Thus, in conjunction with additional investigation to understand the specific contaminants that may need removal, the Plant will [REDACTED] in [REDACTED]¹⁷

Response to Finding 3: Pastoria prioritizes repairs and routine maintenance of equipment.

Various equipment issues and water leaks were identified in the Audit Report.¹⁸ However, there will always be ongoing repair and maintenance with respect to various equipment and systems. Such ongoing maintenance is not an indication of a violation of GO 167. Pastoria prioritizes critical maintenance without delay and addresses preventative maintenance on an ongoing basis, while always keeping safety and reliability at the forefront. Pastoria performs routine inspections which typically allow for prompt identification and/or repair of leaks and other equipment maintenance issues.

1. Prior to the Audit, the Plant had identified and documented work order (“WO”) [REDACTED] steam leak.¹⁹ Pastoria has since completed the repair of the steam leak.
2. As noted in Figures 3 through 5 of the Audit Report, the Plant immediately tightened and repaired the leaking valves during the Audit.²⁰
3. Figures 6 and 7 of the Audit Report identify leaks on the [REDACTED]²¹ Pastoria requires an outage to repair the leaks and has scheduled the repairs during its [REDACTED] outage.²²

¹⁵ See Folder titled, Response to Finding 1.

¹⁶ Audit Report, at 2.

¹⁷ See Folder titled, Response to Finding 2.

¹⁸ Audit Report, Figures 1-20, at 3-12.

¹⁹ See Folder titled, Response to Finding 3.

²⁰ Audit Report, at 4-5.

²¹ Audit Report, at 5-6.

²² See Folder titled, Response to Finding 1.

4. Figure 8 notes leaking [REDACTED]²³ Pastoria generated a WO and has repaired the leak.²⁴
5. Figures 9 and 15 identify leaks on [REDACTED]²⁵ Pastoria has generated WOs and is currently working on obtaining the appropriate parts, however, due to the long lead time needed for fabrication of the [REDACTED] and the length of the outage required, repair is scheduled to be completed in [REDACTED].²⁶ In the meantime, Pastoria is managing the leaks with [REDACTED]
6. The leaks noted in Figures 10, 12, 14, and 18 of the Audit Report have been repaired by the Plant.²⁷
7. Similar to above, the leaks identified in Figures 11, 13, 19 and 20 of the Audit Report require an outage.²⁸ Pastoria has generated WOs and scheduled the repairs during its [REDACTED] outage.²⁹
8. Figures 16 and 17 identify leaking of [REDACTED]³⁰ To address the leaks, equipment modifications and the appropriate equipment parts are necessary. Pastoria has generated a WO and will complete repairs in [REDACTED].³¹

Response to Finding 4: The Plant promptly addressed oil leaks in various equipment.

As mentioned above, ongoing maintenance and repairs with respect to various equipment and systems are part of the normal course of business and Pastoria always attempts to promptly identify and address maintenance issues. The Audit Report notes various equipment with oil leaks.³² During the Audit, Pastoria immediately addressed the leak in Figure 24. The leaks identified in Figures 21-22 and 25 have since been repaired by the Plant.³³ The Plant is addressing the leak in Figure 23 and anticipates completing its repair in [REDACTED].³⁴

²³ Audit Report, at 6.

²⁴ See Folder titled, Response to Finding 3.

²⁵ Audit Report, at 7 and 10.

²⁶ See Folder titled, Response to Finding 3.

²⁷ Audit Report, at 7 and 11; See Folder titled, Response to Finding 3.

²⁸ Audit Report, at 8-9 and 12.

²⁹ See Folder titled, Response to Finding 3.

³⁰ Audit Report, at 10-11.

³¹ See Folder titled, Response to Finding 3.

³² Audit Report, at 13-15.

³³ See Folder titled, Response to Finding 4.

³⁴ *Id.*

Response to Finding 5: Pastoria promptly locked the [REDACTED]

A [REDACTED] was found unlocked during the Audit.³⁵ The unlocked [REDACTED] observed was promptly addressed during the Audit, with the Plant locking on the valve. To further improve our approach, over the next [REDACTED], Pastoria will verbally reinforce the importance of [REDACTED]
[REDACTED]

Response to Finding 6: Pastoria effectively assesses and addresses damaged insulation to maintain the reliable and safe operation of equipment.

The Audit Report identifies various equipment with damaged insulation.³⁶ Some insulation wear and tear is expected. Damage to insulation does not necessarily impact the effectiveness of the insulation. Further, a number of the areas with damaged insulation are not easily accessible to plant personnel. The Plant has re-insulated [REDACTED] in Figure 31 and intends to re-insulate the remaining equipment (i.e., Figures 27-30 and 32-36) during the [REDACTED] outage.³⁷

Response to Finding 7: The Plant has efficiently and effectively identified or repaired its equipment.

As mentioned above, there will always be ongoing maintenance issues to address. The existence of repairs, scheduled repairs, and other routine maintenance is not a violation of GO 167. The Audit report notes deficient components of various equipment, such as damaged [REDACTED]
[REDACTED]³⁸ Pastoria has completed the repairs of these components.³⁹ [REDACTED]

Response to Finding 8: Pastoria adequately maintains operation of its facilities, equipment, and tools.

The Audit Report identifies unmarked and out of travel range [REDACTED]⁴⁰ Pastoria has a robust and comprehensive [REDACTED] inspection program that ensures safe operating conditions. Under this program, [REDACTED] contract with specifically-trained contractors to perform periodic inspections of the [REDACTED]. Pastoria is coordinating with [REDACTED] to obtain the appropriate markers and [REDACTED] repairs, as applicable.⁴¹ Pastoria anticipates completing repairs during the [REDACTED] outage. Although specifically-trained personnel conduct such inspections, Pastoria will also conduct training for all [REDACTED] to identify any gross misalignment of the [REDACTED]

³⁵ Audit Report, at 15-16.

³⁶ Audit Report, at 16-21.

³⁷ See Folder titled, Response to Finding 6.

³⁸ Audit Report, at 22-25.

³⁹ See Folder titled, Response to Finding 7.

⁴⁰ Audit Report, at 25-29.

⁴¹ See Folder titled, Response to Finding 8.

██████████ by the end of ██████████. These ██████████ would then create ██████████ for any gross misalignment identified to then be ██████████.

Response to Finding 9: The Plant continuously strives to improve its maintenance and operational procedures and practices.

The Audit Report identifies chemical deposits on ██████████ and requirements for ventilation control for ██████████.⁴² Pastoria strives to continuously improve the efficient and effective performance and operations of its equipment and systems. Part of the Plant's routine maintenance of its batteries involves ██████████. Pastoria has recently changed its third-party contractor ██████████ which have now been serviced and cleaned.⁴³

The main battery room does have an operational venting and cooling system and a smoke and heat monitoring system to support safe, reliable, and efficient operations. The current ventilation system consists of continuous air flow from a HVAC system which creates positive pressure, pushing air flow out through mechanical rooftop vents. Pastoria is evaluating its existing ventilation system to determine adequacy with applicable codes and to determine if upgrades to the system are needed.⁴⁴

Response to Finding 10: Pastoria conducts maintenance in an effective and efficient manner to ensure equipment performance and reliable operations.

During the Audit, ESRB observed cracks in the concrete foundation of the ██████████.⁴⁵ These are surface-based cracks in the foundation and pose no risk to safety and reliability. Pastoria has already repaired the cracks in the foundation of the ██████████.⁴⁶ Pastoria is in the process of obtaining bids for repairs to the ██████████ and anticipates completion of the repairs during its ██████████ outage.⁴⁷ In the meantime, Pastoria is regularly monitoring the foundation and equipment to ensure the structural integrity of both.

Response to Finding 11: The Plant updated its inspection and maintenance practices of its equipment.

As noted in the Audit Report, Pastoria maintains and organizes its rigging and lifting equipment properly.⁴⁸ Further, the Plant routinely performs inspections of the equipment prior to their utilization. The Audit Report identifies areas of improvement for the Plant's labelling and periodic

⁴² Audit Report, at 30-33.

⁴³ See Folder titled, Response to Finding 9.

⁴⁴ *Id.*

⁴⁵ Audit Report, at 34-36.

⁴⁶ See Folder titled, Response to Finding 10.

⁴⁷ *Id.*

⁴⁸ Audit Report, at 36.

inspection of its rigging and lifting equipment.⁴⁹ To better ensure the performance of periodic inspections, Pastoria has [REDACTED] of its equipment, starting in [REDACTED].⁵⁰ In the meantime, all of the Plant's rigging and lifting equipment is out of service to guarantee there are no risks to safety or reliability. This interim approach will not impact operations, as Pastoria can utilize [REDACTED]. Given that rigging and lifting equipment has been properly maintained and inspected prior to use, there were no risks to safety or reliability and thus no GO 167 violation.

Response to Finding 12: The Plant actively monitors hotspots on the [REDACTED] and repairs equipment as needed.

The Audit Report notes hotspots observed on the [REDACTED].⁵¹ The Plant has a robust infrared inspection program for the [REDACTED] to identify any hotspots needing repairs. The Plant has a [REDACTED] inspections of the [REDACTED] and issue recommendations. Pastoria addresses each area based on [REDACTED] to determine whether continued monitoring or corrective actions are necessary. Using its recent [REDACTED] inspection report, Pastoria is currently investigating the identified hotspots to determine the full scope of work needed and anticipates any needed repairs to take place [REDACTED].⁵²

Response to Finding 13: The Plant maintains proper signage and labeling.

As previously mentioned, there will always be ongoing maintenance which includes refreshing faded signs that result from normal wear and tear. The Audit Report identifies signage (*i.e.*, Figures 61-77) that needs to be removed or is faded or missing.⁵³ During the Audit, Pastoria immediately addressed the signage identified in Figures 71, 74, and 75. The Plant has completely removed the decommissioned eyewash station and signage identified in Figure 77.⁵⁴ The Plant generated work orders and installed the appropriate labels to address the remaining signage issues.⁵⁵

Response to Finding 14: The Plant removed the outdated signage on the storage cabinet.

ESRB staff observed storage cabinets with flammable material signage that did not have self-closing mechanisms on the doors.⁵⁶ As noted in the Audit Report, there were no flammable materials in the cabinet. Pastoria does not use the identified storage cabinet for flammable material; thus, it has removed the outdated signage from the cabinet.⁵⁷ Given that the storage

⁴⁹ Audit Report, at 36-37.

⁵⁰ See Folder titled, Response to Finding 11.

⁵¹ Audit Report, at

⁵² See Folder titled, Response to Finding 12.

⁵³ Audit Report, at 39-48.

⁵⁴ See Folder titled, Response to Finding 13.

⁵⁵ *Id.*

⁵⁶ Audit Report, at 39-48.

⁵⁷ See Folder titled, Response to Finding 14.

cabinet was not used for flammable material storage, there was no risk to personnel safety and thus no GO 167 violation.

Response to Finding 15: Pastoria continuously strives to improve its housekeeping practices.

ESRB observed an unlocked [REDACTED] gate [REDACTED] as well as spare [REDACTED] left from past maintenance activity.⁵⁸ As mentioned in the Audit Report, Pastoria immediately cleaned up the spar [REDACTED] and ensured that the [REDACTED] gate and [REDACTED] were locked.⁵⁹ Further, Pastoria has numerous mechanisms in place to prevent unauthorized access to the site, as detailed in the site's Physical Security Site Plan.⁶⁰

Response to Finding 16: The Plant has correctly labeled NFPA 704 Placards.

Figures 82-87 of the Audit Report identify NFPA 704 placards and their respective Safety Data Sheets ("SDS") sheets that need to be refreshed or installed.⁶¹ Pastoria reviewed the SDS for the [REDACTED] container and ensured it matches the updated NFPA 704 placard on the container. Further, the table in [REDACTED] of the ERP Plan has been updated to accurately detail the hazard ratings of [REDACTED]. The Plant has also installed the new NFPA 704 placards with their respective hazard ratings on the [REDACTED].

Response to Finding 17: The Plant has addressed or repaired the damaged equipment.

The Audit Report identifies various maintenance items that needed attention (*i.e.*, Figures 88-92).⁶² With the exception of the missing bolt in Figure 88, Pastoria has repaired all the other items identified in Finding 17.⁶³ To address the missing bolt of the [REDACTED] (Figure 88), Pastoria will need an outage to erect scaffolding [REDACTED] to make the repair. Thus, Pastoria anticipates installing a new bolt during its [REDACTED] outage.

Pastoria has corrected the parameters of the equipment on [REDACTED]

An alarm on the [REDACTED] was observed during the Audit.⁶⁴ After investigation, it was determined that the alarm was for the alarm equipment itself and not the system that it was monitoring. The sensor equipment has an internal thermostat that is set by the user. The range set by the site was too narrow which triggered a temperature alarm when the equipment was in direct sunlight. The internal temperature parameters were immediately

⁵⁸ Audit Report, at 49-50.

⁵⁹ See Folder titled, Response to Finding 15.

⁶⁰ See Response to Pastoria Audit Information Request, May 7, 2024 (Response 17).

⁶¹ Audit Report, at 51-55.

⁶² Audit Report, at 56-58.

⁶³ See Folder titled, Response to Finding 17.

⁶⁴ Audit Report, at 58-59.

corrected, and the alarm cleared. Given that the alarm was not an indication of an active issue, there was not a safety or reliability risk and thus no GO 167 violation.

Appendix A – Corrective Action Plan

PASTORIA ENERGY FACILITY L.L.C.

Corrective Action Plan

The Pastoria Energy Facility L.L.C. (“Pastoria”) Corrective Action Plan (“Plan”) outlines actions to address items identified in the *California Public Utilities Commission (“CPUC”) Audit Findings of Pastoria Energy Facility July 29-August 2, 2024* (“Audit Report”). As discussed in detail in Pastoria’s *Response to the 2024 Audit Report of Pastoria Energy Facility (Audit No. GA2024-07PE)* (“Pastoria Response”), Pastoria 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: Documentation Procedures	<ul style="list-style-type: none">• New preventative maintenance plan to document IIPP [REDACTED]• New preventative maintenance plan to perform evacuation drills• New preventative maintenance plan to document [REDACTED] LOTO inspections• New preventative maintenance plan to perform [REDACTED]• Update ERP Plan	<ul style="list-style-type: none">• [REDACTED]• Completed• Completed• Completed• Completed
Finding 2: Varnish Control	<ul style="list-style-type: none">• Install varnish removal system	<ul style="list-style-type: none">• [REDACTED]
Finding 3: Water Leaks	<ul style="list-style-type: none">• Repair [REDACTED]• Repair [REDACTED]• Repair [REDACTED]• Repair [REDACTED]• Repair [REDACTED]• Repair [REDACTED]• Repair [REDACTED]• Repair [REDACTED]• Repair [REDACTED]	<ul style="list-style-type: none">• Completed• Completed• Completed• Completed• Completed• Completed• Completed• Completed• Completed

Audit Report Findings	Corrective Actions	Complete/Estimated Completion
	<ul style="list-style-type: none"> Repair [REDACTED] Repair [REDACTED] Repair leaks 	
Finding 4: Oil Leaks	<ul style="list-style-type: none"> Repair [REDACTED] Repair [REDACTED] Repair [REDACTED] Repair [REDACTED] Repair [REDACTED] Repair [REDACTED] 	<ul style="list-style-type: none"> Completed Completed [REDACTED] Completed Completed
Finding 5: Valve	<ul style="list-style-type: none"> Lock and reinforce procedure 	<ul style="list-style-type: none"> Completed
Finding 6: Insulation	<ul style="list-style-type: none"> Install insulation Re-insulate [REDACTED] 	<ul style="list-style-type: none"> [REDACTED] Completed
Finding 7: Equipment Repairs	<ul style="list-style-type: none"> Repair [REDACTED] 	<ul style="list-style-type: none"> Completed
Finding 8: Signage	<ul style="list-style-type: none"> Replace markers and provide training 	<ul style="list-style-type: none"> [REDACTED]
Finding 9: Battery	<ul style="list-style-type: none"> Clean [REDACTED] 	<ul style="list-style-type: none"> Completed
Finding 10: Concrete Foundation	<ul style="list-style-type: none"> Repair [REDACTED] foundation Repair [REDACTED] foundation 	<ul style="list-style-type: none"> Completed [REDACTED]
Finding 11: Inspection Records	<ul style="list-style-type: none"> Perform periodic inspections 	<ul style="list-style-type: none"> [REDACTED]
Finding 12: Infrared Inspections	<ul style="list-style-type: none"> Repair [REDACTED] 	<ul style="list-style-type: none"> [REDACTED]
Finding 13: Signage	<ul style="list-style-type: none"> New [REDACTED] signage New [REDACTED] signage New [REDACTED] identification stickers 	<ul style="list-style-type: none"> Completed Completed Completed

Audit Report Findings	Corrective Actions	Complete/Estimated Completion
Finding 14: Storage Cabinets	<ul style="list-style-type: none"> Decommission cabinets 	<ul style="list-style-type: none"> Completed
Finding 15: Housekeeping	<ul style="list-style-type: none"> Remove [REDACTED] Lock gate and switch 	<ul style="list-style-type: none"> Completed Completed
Finding 16: NFPA Placards	<ul style="list-style-type: none"> New NFPA Placards Update ERP Plan 	<ul style="list-style-type: none"> Completed Completed
Finding 17: Equipment Maintenance	<ul style="list-style-type: none"> Install [REDACTED] Connect [REDACTED] Connect [REDACTED] wires Repair [REDACTED] sign 	<ul style="list-style-type: none"> [REDACTED] Completed Completed Completed
Finding 18: Alarm	<ul style="list-style-type: none"> Correct sensor parameters 	<ul style="list-style-type: none"> Completed