Message

From: Thorpe, Jenalyn [jenalyn.thorpe@exxonmobil.com]
Sent: 3/27/2020 9:08:45 PM
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Subject: Notification of Potential Force Majeure Event for ExxonMobil Beaumont Chemical Plant: COVID-19
Attachments: XOM BMCP Force Majeure COVID-19 Signed 3-27-19.pdf

All –

Please see attached the electronic copy of the notification of a potential Force Majeure event at the ExxonMobil Beaumont Chemical Plant due to COVID-19. We will be providing updates as appropriate. Let me know if you have any questions.

Thanks!

Jenalyn Thorpe
Environmental Advisor

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ExxonMobil

March 27, 2020

Director, Air Enforcement Division
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U.S. Environmental Protection Agency
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1200 Pennsylvania Ave., N.W.
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Room 1119
Washington, DC 20460-0001
CERTIFIED MAIL NO. 7018 2290 0001 3235 6832
RETURN RECEIPT REQUESTED

Re: Notification of Potential Force Majeure Event and Request for Enforcement Discretion as a Result of COVID-19 for the Beaumont Chemical Plant (DJ # 90-5-2-1-10128 and 10128/1)

Pursuant to Paragraphs 88-89 of the Consent Decree ("CD") between the United States and Exxon Mobil Corporation and ExxonMobil Oil Corporation (collectively, "ExxonMobil"), No. 17-cv-3302 (S.D. Tex.), entered on June 6, 2018, this letter provides notice that a potential Force Majeure event, as defined in CD Paragraph 88, is anticipated to occur as a result of coronavirus disease ("COVID-19"). This notification is being provided out of an abundance of caution to preserve all rights under the CD as the COVID-19 pandemic further develops. ExxonMobil continues to take diligent and prudent actions to protect the health and safety of its workers, public, and the environment, and to meet market needs as the COVID-19 pandemic develops. However, this potential Force Majeure event is anticipated to impact the ability of the ExxonMobil Beaumont Chemical Plant (BMCP, RN No. 100542844) to comply with various provisions of the CD and any corresponding state and federal air and water regulations.

Thus, this letter provides proactive notice of potential noncompliance issues under the CD for BMCP due to a Force Majeure event. Additionally, this letter provides notice of potential noncompliance to federal and state regulations and operating permits, as included in this document under additional matters. To the extent exemptions do not apply to any such noncompliance or such issues are deemed to be outside the scope of this potential Force Majeure notice under the CD or other permit, rule, or regulation, ExxonMobil respectfully requests that EPA exercise enforcement discretion and not seek penalties or other enforcement action for the activities undertaken to respond to and recover from COVID-19 from the period of March 27, 2020 to June 30, 2020. This time period represents the potential impacts from COVID-19 to the anticipated return to normal operation of ExxonMobil Beaumont Chemical Plant. This initial period may become extended depending on the nature and severity of the COVID-19 impacts over the next several months, and follow-up notifications will be submitted to provide ongoing updates of actual compliance impacts. Please note

that the Beaumont Chemical Plant will request similar relief as appropriate from the Texas Commission on Environmental Quality (TCEQ) as issues arise.

The CD specifies a Force Majeure request must comply with the requirements of Paragraph 89 of the Consent Decree and must describe an explanation and description of the reasons for the delay; the anticipated duration of the delay; all actions taken or to be taken to minimize the delay; a schedule for implementing any measures to be taken to prevent or mitigate the delay or the effect of the delay; the rationale for attributing such delay to a Force Majeure, and a statement as to whether such an event may cause or contribute to an endangerment of public health, welfare, or the environment. These elements are described below, organized by the respective impacted CD paragraph, along with a discussion of each element. Generally speaking, however, the cause or causes of the delay or impediment is the reductions of staffing and available personnel from COVID-19. ExxonMobil will provide follow-up communications as new issues are identified and to provide updates on the identified issues.

COVID-19 and Its Impacts

Explanation and Description of the Anticipated Delay or Prevented Performance

COVID-19 affects the lungs and airways, with illnesses ranging from mild symptoms to severe illness and death.[1] The virus is highly communicable, remaining viable for hours to days on surfaces made from a variety of materials.[2] The Center for Disease Control and Prevention (CDC) itself has stated that "[m]uch is unknown about how the virus that causes COVID-19 spreads."[3] "Close contact" (within about 6 feet) is the most frequent spread from person-to-person.[4] There is no known treatment or vaccine for COVID-19. The CDC states, "[t]he complete clinical picture with regard to COVID-19 is not fully known." The agency stated, "[t]his is the first pandemic known to be caused by the emergence of a new coronavirus," and admitted that "this is a rapidly evolving situation."[5]

As the COVID-19 pandemic has developed and become more dire across the country, government entities and Non-Governmental Organizations (NGOs) have reacted with progressively more stringent recommendations and restrictions. On January 30, 2020, the International Health Regulations Emergency Committee of the World Health Organization (WHO) labeled the outbreak a "public health emergency of international concern." On January 31, the U.S. Health and Human Services Department declared a public health emergency for international aid. On March 11, the World Health Organization publicly declared COVID-19 as a pandemic, and on March 13, the President of the United States declared the outbreak a national emergency.[6] The same day, the

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[1] "Symptoms," Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/ (accessed March 16, 2020).
[2] "Environmental Cleaning and Disinfection Recommendations," Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/ (accessed March 16, 2020).
[3] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/ (accessed March 16, 2020).
[4] "Environmental Cleaning and Disinfection Recommendations," Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/ (accessed March 16, 2020).
[5] "Situation Summary, Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/ (accessed March 16, 2020).
[6] "Situation Summary, Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/ (accessed March 16, 2020).

Governor of the State of Texas issued a proclamation that COVID-19 poses an imminent threat of disaster, declaring a state of disaster for all counties in Texas.[7] The County Judge of Jefferson County declared a local disaster for public health emergency as well as a series of amended emergency orders progressively restricting condensed population events.[8] The Mayor of Beaumont declared an emergency due to the public health emergency.[9] Local organizations responded swiftly, as the local university moved all classes online for the remainder of the semester,[10] virtually all Jefferson County schools closed,[11] and even places of worship moved services online.[12]

As the Occupational and Safety Health Administration (OSHA) acknowledges, COVID-19 renders wide impacts on absenteeism based on illness, caregiving for sick or the at-risk, and caregiving for school closures. Interrupted supply lines may also cause severe impacts. OSHA specifically recommended flexible telecommuting where possible. OSHA also encouraged minimizing contact among workers, and establishing a reduction in the total number of employees in a facility at a given time, "allowing them to maintain distance from one another..."[13] Eventually, the CDC recommended that in-person community events of fifty (50) people or more be postponed or cancelled, with a subsequent recommendation by the White House that in-person events of ten (10) people or more be canceled or postponed between March 16-30.[14]

The CDC states, "[a]ll employers need to consider how best to decrease the spread of acute respiratory illness and lower the impact of COVID-19 in their workplace..."[15] The Beaumont Chemical Plant has taken and continues to take cautious and reasonable steps to prepare for any COVID-19 impact, including following (and exceeding) the cleaning and disinfection recommendations of the CDC for weeks prior to any confirmed case in Beaumont or Jefferson County.[16] The Beaumont Chemical Plant followed established recommendations to avoid spread of the illness.[17]

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[7] "Governor Abbott Declares State of Disaster in Texas Due to COVID-19", Office of the Texas Governor, https://gov.texas.gov/news/post/ (accessed March 16, 2020).

[8] "Coronavirus COVID-19 Related Documents and Declarations," Jefferson County, https://co.jefferson.tx.us/documents/ (accessed March 16, 2020).

[9] "City of Beaumont Disaster Declaration," 12 News Now, https://www.12newsnow.com/article/ (accessed March 17, 2020).

[10] "LIT moves classes online, cancels travel," Isaac Windes, Beaumont Enterprise, https://www.beaumontenterprise.com/news/ (accessed March 16, 2020).

[11] "Nederland-PNG districts to close through March 15," Beaumont Enterprise, https://www.beaumontenterprise.com/news/ (March 16, 2020); "Hamshire Fannett to Close Campuses this Week," Beaumont Enterprise, https://www.beaumontenterprise.com/news/ (accessed March 16, 2020); "Tekoa Academy Closes Doors due to Conoravirus," Beaumont Enterprise, https://www.beaumontenterprise.com/news/ (accessed March 16, 2020).

[12] "Sermons go digital as coronavirus intrudes on church hour," Beaumont Enterprise, https://www.beaumontenterprise.com/news/ (accessed March 16, 2020).

[13] "Guidance on Preparing Workplaces for COVID-19," Occupational Safety Health Administration, https://www.osha.gov/Publications/ (March 16, 2020).

[14] "Get Your Mass Gatherings or Large Community Events Ready," Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/ (accessed March 16, 2020).

[15] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/ (accessed March 16, 2020).

[16] "Environmental Cleaning and Disinfection Recommendations," Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/ (accessed March 16, 2020).

[17] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/ (accessed March 16, 2020).

The Beaumont Area Facilities carefully established essential personnel plans in place. On March 16, all ExxonMobil Beaumont Area Facilities (including the Refinery, Colonial Storage, Beaumont Chemical Plant, Beaumont Polyethylene Plant, and other facilities) transitioned to "Hot Standby Phase" of its plan, taking steps to facilitate further social distancing and leveraging alternative work locations by going to "essential personnel" only.

However, as the CDC acknowledges, those plans must be "flexible" given the uncertainties related to the disease and possible community impacts.[18] When planning, the CDC recommended considering factors including:

- The overall number of attendees (*the Beaumont Chemical Plant has approximately 550 employees, and numerous contractors);*
- The number of people attending who are at greater risk of more serious illness after contracting COVID-19 *(The Beaumont Chemical Plant employs vulnerable employees);*
- The density of attendees within a confined area *(The Beaumont Chemical Plant's normal operations require work within close proximity);*
- The potential economic impact to participants, attendees, staff, and the larger community *(The Beaumont ExxonMobil Complex directly or indirectly generates jobs for 1 out of 7 employees in Jefferson County);*
- The level of transmission in your local community, and the level of transmission in the areas from which your attendees will travel (*Jefferson County, Texas currently has reported thirteen (13) confirmed cases of COVID-19, and ExxonMobil is a global company)*; and
- If there are ways in which to significantly reduce the number of attendees.[19]

ExxonMobil has carefully considered ways in which to significantly reduce the number of attendees while still meeting regulatory obligations. The actions taken by the sites to date have been reasonable and prudent while balancing regulatory and legal obligations and maintaining the health and safety of its workers and the public. Measures taken by BMCP includes proactively reinforcing social distancing (including reducing the number of non-essential employees working on-site at BMCP), limiting exposure of essential personnel to outside persons, and implementing the use of virtual meetings. Personnel were additionally asked to self-monitor for symptoms, including taking temperature twice daily, and to self-quarantine if the employee or contractor had symptoms of COVID-19, has come in contact with a person with COVID-19, or has recently travelled to an area with sustained COVID-19 transmission. Additionally, due to the impacts of COVID-19, schools in the local area have temporarily closed until further notice which caused many employee's children to be at home during the day. In order to enable on-site presence of essential personnel to maintain safe operations of the Beaumont Chemical Plant, ExxonMobil has offered a backup care advantage program to assist qualifying employees with finding child care. Unfortunately, future developments may impair the ability to fulfill all requirements. Due to what all federal, state, and local agencies acknowledge to be a rapidly evolving and unknown progression of the disease in the public, the Beaumont Chemical Plant respectfully provides notice that the following may be potential impacts

[18] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/ (accessed March 16, 2020).
[19] Get Your Mass Gatherings or Large Community Events Ready," Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/ (accessed March 16, 2020).

arising from the disease beyond the control of ExxonMobil, despite the exercise of due diligence and all reasonable steps to avoid or minimize delays or impediments to performance.

Anticipated Duration of the Delay, and Schedule for Mitigating the Delay or Prevented Performance

ExxonMobil currently anticipates that the Beaumont Chemical Plant will be able to resume normal staffing of its facilities and return to normal work arrangements beginning no later than June 30, 2020. However, due to the uncertainty associated with the rapidly evolving developments of COVID-19, the actual length of time where delays are felt may be different than originally anticipated. While following recommendations from the Centers for Disease Control and the Occupational Safety and Health Administration, and monitoring the community and greater effects of COVID-19, ExxonMobil will make all diligent efforts to protect the health of its employees to maintain safe operation, and to return to normal operations as soon as practical. Updates to the exact timing of resuming normal operations will be included in the follow-up to this letter.

Potential Impacted Issues

As a result of the above described situation, ExxonMobil believes the potential impact of COVID-19 on the Beaumont Chemical Plant qualifies as a Force Majeure event as described in Paragraph 88 of the CD. The following list identifies an initial set of potential federal air regulatory compliance issues under the above referenced Consent Decree that would most likely occur in the initial phases of COVID-19 response, along with the anticipated impact time period. It is important to note that most of these are primarily administrative delays or adjustment to activities which are expected to have minimal to no emissions or environmental impact, if any. Site emission control and treatment devices and systems remain operational at this time consistent with CD and other regulatory obligations. ExxonMobil's requests and contingency responses are consistent with the March 26, 2020 guidance memo provided by the EPA ("COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program"), and are reasonable and environmentally protective in light of the pandemic impacts acknowledged by EPA's guidance memo.[20] The additional matters section provides examples of potential compliance issues outside of the Consent Decree (e.g., Title V permit and Federal regulations) and should not be considered exhaustive. To the extent that the effects of this pandemic impact the ability of any or all of the ExxonMobil Facilities to comply with federal air and water regulations, ExxonMobil requests enforcement discretion during this event for the following enumerated areas for the period from March 27, 2020 through June 30, 2020. This time period represents the commencement of anticipated potential impacts from COVID-19 to our best current estimate of a return to normal operation.

Impacted CD Requirements

Impacts noted here may have overlap with state and federal requirements and/or operating permits.

1. *QAQC Requirements [CD Paragraph 25(a)(i)]*
   The Consent Decree requires BMCP to comply with quality assurance and quality control activities in order to maintain proper operation of CD instruments and analyzers. These activities must be done on a predefined schedule, including required daily, quarterly, and annual QA/QC requirements. Although ExxonMobil will continue best efforts to comply with all applicable

[20] "COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program," Environmental Protection Agency, https://www.epa.gov/coronavirus (accessed March 26, 2020).

QA/QC requirements as set forth in the Consent Decree, staffing challenges may limit ExxonMobil's ability to meet these requirements due to the effects of COVID-19.

2. *Instrument Downtime [CD Paragraph 45]*
The Consent Decree requires BMCP to maintain less than 5% downtime for specific instrumentation associated with the Covered Flares. Currently all Consent Decree flare instrumentation downtime remains less than 5% of total operating time. Although ExxonMobil will continue to make best efforts to properly operate each instrumentation system, including completing repairs in a timely manner to maintain minimal downtime on each system, it is possible the effects of COVID-19 may restrict access for many contractors and ExxonMobil employees to these instrumentation systems in the field. These disruptions may increase downtime on flare instrumentation systems, including potentially exceeding 5% of operating time, despite best efforts to minimize downtime. ExxonMobil will use other instrumentation and systems, as available, to operate Covered Flares to meet combustion efficiency standards.

3. *Fenceline Monitoring [CD Paragraph 48]*
The Consent Decree requires BMCP to maintain and collect samples from 27 passive benzene monitors located around the fenceline of the facility. ExxonMobil will make every reasonable effort maintain the sample stations, collect the samples, process samples in a timely manner, and post to the public website within a 14-day period. It is possible the effects of COVID-19 will impede ExxonMobil from being able to meet its obligation for Fenceline Monitoring as outlined in CD Paragraph 48 and CD Appendix 2.2.

4. *Reporting Requirements – First Updated Waste Gas Minimization Plan [CD Paragraph 30] and Semi-Annual Reports [CD Paragraph 66]*
ExxonMobil is required to submit certain reports to the EPA, including the First Updated Waste Gas Minimization Plan (WGMP) due on June 5, 2020 and the Semi-Annual report, due every six months. Although ExxonMobil will use best efforts to prepare and submit these reports in a timely manner consistent with Consent Decree requirements, it is possible the on-going effects of COVID-19 may reduce qualified personnel able to compile and review these reports for accuracy and completion. Any expected delay to the completion of these reports will be included in a follow-up letter to the EPA.

5. *Supplemental Environmental Project ("SEP") [CD Paragraph 49 and CD Appendix 2.1]*
The Consent Decree requires ExxonMobil sites to complete a Supplemental Environmental Project (SEP), or a tree planting project in Baytown, Texas. Any potential impacts and updates relating to this SEP due to COVID-19 pandemic will be communicated from the ExxonMobil Baytown Chemical Plant to the EPA and DOJ on behalf of all ExxonMobil facilities under this Consent Decree.

6. *Additional Matters – Potential Noncompliance Outside of CD Examples (not all-inclusive)*
COVID-19 and its associated impacts to staffing of BMCP may result in potential noncompliance to state and federal air and water regulations and/or permit requirements. ExxonMobil currently anticipates all noncompliance issues will be resolved as outlined above the in the schedule for mitigating the delay. Below is a summary of potential non-compliance issues outside of the scope of the Consent Decree, but impact environmental compliance. The Beaumont Chemical Plant will

communicate any of these issues, should they occur, through the enforcement discretion protocol previously set up by the Texas Commission on Environmental Quality (TCEQ). Best efforts will be made to ensure State and Federal release reporting obligations are made as required.

- Leak Detection and Repair Component Monitoring (LDAR, EMACT, HON, MON, Permits, and other federal and state regulations)
  The ExxonMobil Beaumont Facilities anticipate that some monitoring and/or repair on some components may not be completed or delayed due to COVID-19 staffing impacts, and that it may not be possible to complete fugitive emissions monitoring, including daily rounds for audio, visual and olfactory (AVO) testing, and repair on some components for which monitoring and repair is required. ExxonMobil will continue to conduct all monitoring and repairs to the best of its ability.

  If qualified personnel availability is reduced due to COVID-19 impacts and infection rates, alternative monitoring approaches will be evaluated with state and federal agencies. Alternatives might include Optical Gas Imaging (OGI) camera monitoring, FLIR (Infrared) cameras, smaller monitoring crews, etc. Those approaches are yet to be determined. This alternate process would use a relaxed recordkeeping requirement by only recording leaks found and subsequent leak repairs.

  ExxonMobil currently anticipates maintaining the fenceline monitoring program to maximum extent possible to ensure any impacts for LDAR monitoring delays would be readily detected. It is possible the effects of COVID-19 will impede ExxonMobil from being able to meet its obligation for Fenceline Monitoring as outlined in CD Paragraph 48 and CD Appendix 2.2.

- Storage Tanks (NSPS K, Ka, and Kb; NESHAP Subparts 61 and 63, HON, Reg V)
  BMCP is required by state and federal regulations to complete regular tank inspections on applicable tanks and requires inspections on controlled vent systems (CVS), with some tank inspections required to be completed as early as March 31, 2020. Although ExxonMobil will make best efforts to complete the required inspections by the due date, it is possible that the COVID-19 pandemic will reduce qualified personnel available to complete the inspection, resulting in delays and late inspections. Additionally, repairs for issues found during inspection may be delayed beyond repair deadlines. Any COVID-19 impacts to storage tank provisions will be noted in a follow-up letter.

- Continuous Emissions Monitoring Systems (CEMS) and Continuous Parametric Monitoring Systems (CPMS) (Operating Permit and other Federal regulations requiring continuous monitoring)
  BMCP is required to maintain Continuous Emission Monitoring Systems (CEMS) on various equipment within the plant. Maintenance of the CEMS includes daily validations, quarterly calibration gas audits (CGAs), yearly relative accuracy test audits (RATAs), regular stack tests of impacted equipment, and maintaining CEMS and CPMS uptime greater than 95% of total operating time. Although ExxonMobil currently continues to operate and maintain all impacted CEMS and CPMS according to the requirements outlined in the BMCP operating permits, it is possible that limited personnel due to COVID-19 may restrict the ability of

ExxonMobil to properly repair and/or maintain the CEMS or CPMS to meet CEMS and CPMS uptime requirements. These potential impacts on personnel due to COVID-19 may also result in late CGAs.

If there is a specific QA/QC/Performance Tests which cannot be performed due to lack of vendor availability, ExxonMobil will evaluate if the operating parameters of the emission control device and/or monitoring equipment indicate a degradation in performance to monitor emissions limitations.

- Hazardous Waste Management (40 CFR 260 – 280 and 30 TAC 335)
  BMCP is applicable to RCRA federal and state requirements which regulate how hazardous waste is managed on-site prior to being accepted at a transportation, storage, and disposal facility (TSDF). Hazardous waste is applicable to specific management requirements at the facility, including temporary storage in on-site containers, inspections of waste containers and storage areas, sampling, analysis of sample results and subsequent waste classification, scheduling disposal with a vendor who meets all requirements, and transportation by qualified personnel. Management of hazardous waste requires qualified personnel and facilities; spreading impacts of COVID-19 may impact the availability of trained personnel to complete each of these tasks in order to ship hazardous waste to a TSDF within 90 days. Required site inspections of containers and storage areas could be delayed due to a lack of available qualified personnel. Additionally, if contract labs are impacted by COVID-19 and are unable to provide timely analysis of collected samples, delayed or potentially missed holding times may be experienced.

  ExxonMobil will continue make best efforts to manage hazardous wastes according to regulatory requirements, and expedite shipments to meet current 90-day onsite retention requirements. However, if shipping firms do not have the necessary drivers for transportation or if disposal facilities are closed, then sites will retain wastes on-site until next available opportunity to ship the wastes. Agency notification of any waste shipment delays will happen concurrent with site response.

- Regulatory Reporting (State and Federal Regulations, Operating Permits)
  ExxonMobil is required to send regular reports to state and federal agencies for requirements to which it is subject. These reports require significant effort and coordination across the site to complete the reports accurately and in a timely manner. Although ExxonMobil plans to complete all required federal and state reporting requirements, it is possible due to absenteeism and other qualified personnel impacts from the COVID-19 pandemic may inhibit the ability of ExxonMobil to provide reports or specific data within reports according to the desired timeline. Should reports be delayed, this information will be communicated to the applicable parties, as well as in a follow-up letter.

- Delays in conducting inspections, sampling, monitoring, recordkeeping, emissions testing, and submitting reports, as is required by 30 TAC 122 (Title V) and 40 CFR Part 60, 61, 63, and 68

ExxonMobil will use best efforts to complete the reports for submittal using the best information with personnel available but reserves the right to update with additional information once full personnel return.

- OSHA PSM and EPA RMP regulations
  The following table lists OSHA Process Safety Management and EPA Risk Management Plan requirements that may result in noncompliance due to the impact at BMCP from COVID-19.

OSHA PSM	EPA RMP	Activity
29 CFR 1910.119(j)(4)	40 CFR 68.73	-Documentation of training compliance may be delayed during COVID-19 staffing due to inability to access database / intranet remotely and/or personnel absenteeism. -Inspection and testing frequency may need to be extended to account for reduced staff (absenteeism due to illness or due to measures taken to reduce the spread of illness). -Timeliness of deficiency mitigation may be compromised due to reduced staff (absenteeism due to illness or due to measures taken to reduce the spread of illness). -In the event that inspections or mitigation steps need to be extended, appropriate risk assessment protocols will be followed to document deferral decision.
29 CFR 1910.119(e)(6)	40 CFR 68.67 (f)	-Unit PHA may be delayed beyond the required 5 year update due to reduced staff (absenteeism due to illness or due to measures taken to reduce the spread of illness), including BMCP Prefractionator / Depentanizer unit PHA due before April 20, 2020.
29 CFR 1910.119(g)(2)	40 CFR 68.71(b)	-3 year refresher training may go overdue due to inability to access database / internet remotely and/or absenteeism. Once COVID-19 impacts are mitigated and personnel restrictions relieved, refresher training would be completed as soon as reasonably practical.

At this time, ExxonMobil has not noted any additional regulatory compliance concerns from the standards enumerated in the Consent Decree or other applicable regulations at BMCP. It is possible with the spreading and widening impact of the COVID-19 pandemic that additional concerns and/or noncompliance may occur, despite the best efforts of ExxonMobil to maintain safe, reliable, and compliant operations. All reasonable efforts will be made by ExxonMobil to ensure compliance with the Consent Decree and other applicable federal and state regulations and permits, and will make best efforts to complete the requirements in an expeditious fashion should undesired delays occur due to COVID-19. Although ExxonMobil does not currently anticipate compliance concerns outside of those previously listed, ExxonMobil reserves the right to identify additional incidents to which Force Majeure applies, and will provide updates to the EPA in a follow-up letter.

Unless otherwise requested by EPA, all reporting on the above items will be performed as specified in the CD or in applicable regulations and/or Title V reports. In addition, ExxonMobil will report any

deviations from Consent Decree standards, as outlined above, as applicable resulting from this situation in the next CD Semi-Annual Report and in other reports as required by federal regulations.

A follow-up letter will be sent out to provide an update of any impacts and the recovery of the Beaumont Chemical Plant from COVID-19. Additional updates will be provided throughout the duration of the pandemic period, as necessary. If you have any questions or concerns about this notice, please contact Stephen Codoluto at (409) 240-3279 or beaumont.env.admin@exxonmobil.com.

Sincerely,

3-27-20

David M. Gorsich
Beaumont Complex SSHE Manager

jt

cc:

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March 27, 2020
Follow-up to Notification of Force Majeure Event and Request for Enforcement Discretion as a Result of COVID-19 for ExxonMobil Beaumont Chemical Plant

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March 27, 2020
Follow-up to Notification of Force Majeure Event and Request for Enforcement Discretion as a Result of COVID-19 for ExxonMobil Beaumont Chemical Plant

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osbourne.margaret@epa.gov
OCE@tceq.texas.gov
ramiro.garcia@tceq.texas.gov

Message

From: Ramiro Garcia [ramiro.garcia@tceq.texas.gov]
Sent: 4/1/2020 10:23:07 PM
To: Thorpe, Jenalyn [jenalyn.thorpe@exxonmobil.com]; eescdcopy.enrd@usdoj.gov; Parrish, Robert [Parrish.Robert@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; OCE [OCE@tceq.texas.gov]
CC: Codoluto, Stephen C [stephen.c.codoluto@exxonmobil.com]; La Fortune, Farrah G [farrah.g.lafortune@exxonmobil.com]; Job, Jennifer Leann [jennifer.l.job@exxonmobil.com]; Henrichson, Lucinda [lucinda.henrichson@exxonmobil.com]; Chessher, Alice Earlynn [alice.e.chessher@exxonmobil.com]; Bentley, Bambi A [bambi.a.bentley@exxonmobil.com]; Roccaforte, Charles M [charles.m.roccaforte@exxonmobil.com]; Hampton, Sherman W [sherman.w.hampton@exxonmobil.com]; Jonathan Walling [jonathan.walling@tceq.texas.gov]; Cynthia Gandee [cynthia.gandee@tceq.texas.gov]; Susan Johnson [susan.johnson@tceq.texas.gov]; Jayme Sadlier [jayme.sadlier@tceq.texas.gov]
Subject: RE: Notification of Potential Force Majeure Event for ExxonMobil Beaumont Chemical Plant: COVID-19

Good afternoon Ms. Thorpe,

This email confirms ExxonMobil is not requesting enforcement discretion.

If anything changes, please feel free to contact us.

Best regards,

Ramiro Garcia, Jr.
Deputy
Office of Compliance & Enforcement
TCEQ

From: Thorpe, Jenalyn <jenalyn.thorpe@exxonmobil.com>
Sent: Friday, March 27, 2020 4:09 PM
To: eescdcopy.enrd@usdoj.gov; parrish.robert@epa.gov; foley.patrick@epa.gov; osbourne.margaret@epa.gov; OCE <OCE@tceq.texas.gov>; Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Cc: Codoluto, Stephen C <stephen.c.codoluto@exxonmobil.com>; La Fortune, Farrah G <farrah.g.lafortune@exxonmobil.com>; Job, Jennifer Leann <jennifer.l.job@exxonmobil.com>; Henrichson, Lucinda <lucinda.henrichson@exxonmobil.com>; Chessher, Alice Earlynn <alice.e.chessher@exxonmobil.com>; Bentley, Bambi A <bambi.a.bentley@exxonmobil.com>; Roccaforte, Charles M <charles.m.roccaforte@exxonmobil.com>
Subject: Notification of Potential Force Majeure Event for ExxonMobil Beaumont Chemical Plant: COVID-19

All –

Please see attached the electronic copy of the notification of a potential Force Majeure event at the ExxonMobil Beaumont Chemical Plant due to COVID-19. We will be providing updates as appropriate. Let me know if you have any questions.

Thanks!

Jenalyn Thorpe
Environmental Advisor

ExxonMobil Beaumont Complex
1795 Burt St., BOB #3438
O: 409 240 4737
C: 862 259 5410

Message

From: Maxwell, Benji [Benji.Maxwell@fhr.com]
Sent: 3/31/2020 10:26:37 PM
To: TCEQR5AIR@tceq.texas.gov; Seager, Cheryl [Seager.Cheryl@epa.gov]; michelle.baetz@tceq.texas.gov
CC: Shelton, Bill [Bill.Shelton@fhr.com]
Subject: NSPS DDD semiannual report
Attachments: Longview DDD March 2020_signed.pdf

Please see attached NSPS DDD semi-annual report for Flint Hills Resources, Longview, TX. Please reply with confirmation of reeipt.

Thanks,
Benji Maxwell
903.309.8407

VIA E-Mail ONLY

Per Enforcement Discretion granted March 27, 2020

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

March 31, 2020

Mr. Zachary Covar, Executive Director
Texas Commission of Environmental Quality
P.O. Box 13087
Austin, Texas 78711-4087

Subject: Flint Hills Resources Longview, LLC (CN603776725) (RN100542695)
TCEQ Air Quality Account No.: HH-0171-A
Federal Operating Permit Number O1282
NSPS Subpart DDD Semi-Annual Report

Dear Mr. Covar:

In accordance with NSPS Subpart DDD, 40 CFR 60.562-2(e) and 60.565(k), Flint Hills Resources Longview, LLC ("FHR") hereby submits a semi-annual report for its polypropylene production facility in Longview, TX ("Longview Facility" or "Facility") relating to its Equipment Leak Detection and Repair Program and Low Pressure Flares. This semi-annual report covers a reporting period of September 1 2019 to February 29, 2020. Part I of the report provides the information required under 40 CFR 60.562-2(e). Part II of the report provides the information required under 40 CFR 60.565(k).

I certify that, based on information and belief formed after reasonable inquiry, the statements and information contained in the attached documents are true, accurate, and complete.

Should you have questions concerning this report, please call Benji Maxwell at (903) 309-8407.

Sincerely,

Bill Shelton
Plant Manager

cc: Ms. Michelle Baetz
Regional Air Program Director
TCEQ Region 5
2916 Teague Drive
Tyler, Texas 75701-3756
(via email only: michelle.baetz@tceq.texas.gov)

Cheryl Seager
US, EPA, Region VI
Director; Enforcement & Compliance Assurance
1201 Elm St., Suite 500
Dallas, TX 75270
(via email only: Seager.cheryl@epa.gov)

Flint Hills Resources Longview, LLC
NSPS Subpart DDD Semi-Annual Report
for September 1, 2019 to February29, 2020

Part I

60.562-2(e) requires FHR to submit a semi-annual report in accordance with 60.487(c). The following information is provided as required by 60.487(c):

1. 60.487(c)(1) - Process Unit Identification:

The following process unit equipment at the Longview Facility is subject to NSPS Subpart DDD:

- Line 2 Polymerization Reaction
- Line 1 & 2 Product Finishing (Does not contain any LDAR subject components that contain VOC)
- Lines 1 & 2 Raw Materials Prep including (C3 Unloading Unit piping from Storage Vessel (139-TK-19) outlet and pipeline which enters ground to Synthesis Unit)
- Lines 1 & 2 Materials Recovery
- Lines 1 and 2 High Pressure Flares are used for emergency purposes only. (The High Pressure Flares are not used for continuous NSPS vents.)

The following process unit equipment at the Longview Facility is **NOT** subject to NSPS Subpart DDD:

- Raw Materials Prep (Propylene Unloading Excluding piping from storage vessel to pipeline which enters ground to Synthesis unit)
- Propylene Unloading Flare (Excluding instances when NSPS DDD applicable intermittent streams may be burned)
- Line 1 Polymerization Reaction
- Product Finishing at Processing

2. 60.487(c)(2) – Equipment monitoring information for each month during the semi-annual reporting period:

	Equipment Monitoring	Sep	Oct	Nov	Dec	Jan	Feb
i.	Number of Valve Leaks Detected	0	0	0	0	0	0
ii.	Number of Valve Leaks Not Repaired	0	0	0	0	0	0
iii.	Number of Pump Leaks Detected	0	0	0	0	0	0
iv.	Number of Pump Leaks Not Repaired	0	0	0	0	0	0
v.	Number of Compressor Leaks Detected	0	0	0	0	0	0
vi.	Number of Compressor Leaks Not Repaired	0	0	0	0	0	0

Equipment Monitoring per unit	Raw Mat Prep	L2 Poly Rxn	L1 Mat Rec	L2 Mat Rec
Number of Valve Leaks Detected	0	0	0	0
Number of Valve Leaks Not Repaired	0	0	0	0
Number of Pump Leaks Detected	0	0	0	0
Number of Pump Leaks Not Repaired	0	0	0	0
Number of Compressor Leaks Detected	0	0	0	0
Number of Compressor Leaks Not Repaired	0	0	0	0

3. 60.487(c)(3) - Dates of Unit Shutdowns:

Valves listed on the DOR List as of 9/01/19: 0
(for purposes of this report, valves listed here are leaking in excess of 10,000 ppmv or did when originally placed on DOR but are still on DOR for other rules)

Valves added to DOR during the period (9/1/2019 - 2/29/2020): 0

Valves removed from DOR during the period (9/1/2019 - 2/29/2020): 0

NSPS DOR List as of 2/29/20 0

There was 1 planned unit shutdown of affected equipment for the period of 9-1-2019 – 2-29-2020.

9-17-2019	Shutdown L-1 C90 compressor for maintenance checks	
	NSPS DOR repairs (if any)	0

4. 60.487(c)(4) - Revisions to the Initial Report:

During the reporting period, 5 gas/vapor and 7 light liquid valves in Materials Recovery, 15 gas/vapor valves in raw materials prep, and 1 gas/vapor valve in polymerization were added to the NSPS LDAR monitoring program due to project work.

There were 2 gas/vapor valves in polymerization, 6 gas/vapor valves in raw materials prep, 4 gas vapor valves and 4 light liquid valves that were deleted from the NSPS LDAR monitoring program due to project work.

Part II

The following information is provided as required by 40 CFR 60.565(k):

1. 60.565(k) (1) – Report all exceedances of monitored parameters recorded under §§60.565 (c), (d)(2), and (f).

This section is not applicable because the facility does not operate an incinerator, boiler, process heater, adsorber, condenser, or a control device other than a flare to comply with §60.562–1.

2. 60.565(k) (2) - Report periods when the vent stream has been diverted from the control device:

Certain low point bleed valves on the flare header must be opened to drain accumulated water on a daily basis for process safety purposes. However, FHR does not consider the opening of these valves to be a diversion from a control device as contemplated by NSPS DDD.

NSPS DDD requires those valves that could possibly divert vent streams from a control device to be car-sealed shut. FHR has procedures in place to ensure compliance with this requirement by car sealing/controlling the valves that can be directed to the atmosphere from the Low Pressure Flare ("LPF") system. For the more frequently used drain valves, FHR uses a lock and key system for car sealing with operation of the valves recorded as required in the operator hand held routes. In addition, FHR's procedure for draining these valves requires operators to close the valve as quickly as possible once the leg has been drained in order to minimize gas emissions through the bleed valve.

3. 60.565(k) (3) – Report all periods when the boiler or process heater was not operating:

This section is not applicable because the facility does not operate any boilers or process heaters.

4. 60.565(k) (4) - Report all periods of operation in which the flare or the pilot flame of the flare is absent:

Both Line 1 and Line 2 Low Pressure Flares (LPFs) are equipped with two pilots each. The pilots for each flare are located across from one another in the LPF box and act as redundant pilot coverage for the entire burner assembly on the Line 1 or Line 2 LPF side. Accordingly, FHR considers the pilot flame to be absent when both of the redundant pilot flames are simultaneously extinguished for each flare system.

Each pilot on the Line 1 LPF is equipped with a thermocouple, TL75K44B and TL75K44D. Each pilot on the Line 2 LPF is equipped with a thermocouple, TL75K44A and TL75K44C. And each thermocouple signals a separate alarm if it detects a potential loss of pilot flame.

Pilot alarms may indicate a pilot outage. When a pilot alarm is received, operators are required to immediately verify pilot flame presence. But, since the pilots are also equipped with automatic re-light devices, it is possible that the pilots may have been extinguished, and then re-lit before the operator can verify pilot flame presence or absence. Accordingly, out of an abundance of caution, FHR's policy is to report all instances when both pilot thermocouple alarms signal a potential loss of pilot flame simultaneously for each LPF system.

During the reporting period, there were no pilot losses for the Line 1 or Line 2 LPFs during flare operation.

5. 60.565(k) (5) – Report all periods when the 14 day rolling average exceeded the applicable standard:

This requirement is not applicable because the facility does not operate any cooling towers and/or ethylene glycol vacuum systems.

Flint Hills Resources Longview, LLC
NSPS Subpart DDD Semi-Annual Report
for September 1, 2019 to February29, 2020

6. 60.565(k) (6) & (7) - Report any change in the process operations that increases the uncontrolled emission rate (PROANVENTS) or the VOC weight percent (PRONEWPELL) of the process line in which the affected facility is located, as recorded in 60.565(h)

There have been no process changes that increase emissions from those process vents on Line 2 exempted from control standards (PROANVENTS & PRONEWPELL) at a significance level that could change applicability.

Message

From: Maxwell, Benji [Benji.Maxwell@fhr.com]
Sent: 3/26/2020 7:13:10 PM
To: mailto:leroy.biggers@tceq.texas.gov [leroy.biggers@tceq.texas.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]
CC: Shelton, Bill [Bill.Shelton@fhr.com]; Jozwiak, Rochelle M. [Rochelle.Jozwiak@kochps.com]; Louvier, Joseph [Joseph.Louvier@fhr.com]
Subject: COVID-19 Request for enforcement Discretion

Flint Hills Resources Longview, LLC (TCEQ RN100542695) ("FHR") is requesting enforcement discretion due to the impact from COVID-19 (coronavirus) on FHR and/or third-party resources. FHR has implemented a reduced onsite workforce plan necessary to prevent the spread of COVID-19 in the workplace, to protect the health of our employees and third-party resources, and to ensure the continuity of our operations. Summarized below are the details of the request:

- Due to teleworking implemented at the Longview site, FHR is requesting the ability to submit electronically via email any notifications and/or reports required to be submitted via mail or courier in hard copy form. (Reports submitted electronically, i.e., via STEERS, will continue to be submitted electronically.) This request covers reports or notifications under the various environmental permits and/or regulations applicable at the site, including but not limited to:
    - Title V permit: O-1282;
    - NSR permit: 18105;
    - Delegated Federal Environmental Regulations:
        - 40 CFR 60 Subparts VV; DDD
        - 40 CFR Parts 260 – 279;
    - State Environmental Regulations; and
    - Texas Audit Privilege Act.
- FHR also requests to utilize, if necessary, DocuSign® for electronic signatures on any or all electronic submittals.
- FHR anticipates this relief to continue to be necessary during the pendency of telework recommendations by local, state and federal authorities, including but not limited to, the City of Longview, Gregg and Harrison County, the State of Texas and the CDC.
- FHR will submit PDF versions of the report and/or notification via email to the Region 5 appropriate media team email (TCEQR5AIR@tceq.texas.gov, TCEQR5WATER@tceq.texas.gov and TCEQR5WASTE@tceq.texas.gov); to the appropriate TCEQ staff contact, if known; and to EPA Region 6, where copies to EPA are also required.

FHR will maintain adequate records to document activities related to this instance of noncompliance, including details of FHR's efforts to comply. If you have any questions or need additional information to approve this request, please contact me via email above or via cell phone at (903) 309-8407.

Regards,

Benji Maxwell

Environmental Manager

Flint Hills Resources Longview, LLC

Longview, Texas

Message

From: Ramiro Garcia [ramiro.garcia@tceq.texas.gov]
Sent: 4/1/2020 9:39:30 PM
To: Knowles, Daren [Daren.Knowles@fhr.com]; OCE [OCE@tceq.texas.gov]
CC: Seager, Cheryl [Seager.Cheryl@epa.gov]; Nicole Bealle [Nicole.Bealle@tceq.texas.gov]; Hutcherson, John [John.Hutcherson@fhr.com]; Tracy Miller [tracy.miller@tceq.texas.gov]; Susan Johnson [susan.johnson@tceq.texas.gov]; Monica Aplin [Monica.Aplin@tceq.texas.gov]; Jacqueline Cullather [Jacqueline.Cullather@tceq.texas.gov]; Jonathan Walling [jonathan.walling@tceq.texas.gov]; Cynthia Gandee [cynthia.gandee@tceq.texas.gov]
Subject: RE: COVID-19 Request for Enforcement Discretion

Good afternoon Mr. Knowles,

This email confirms receipt of your correspondence. We are reviewing your request and expect to have a response soon.

Best regards,

Ramiro Garcia, Jr.
Deputy
Office of Compliance & Enforcement
TCEQ

From: Knowles, Daren <Daren.Knowles@fhr.com>
Sent: Wednesday, April 1, 2020 12:09 PM
To: OCE <OCE@tceq.texas.gov>
Cc: Ramiro Garcia <ramiro.garcia@tceq.texas.gov>; Seager.Cheryl@epa.gov; Nicole Bealle <Nicole.Bealle@tceq.texas.gov>; Hutcherson, John <John.Hutcherson@fhr.com>
Subject: COVID-19 Request for Enforcement Discretion

Flint Hills Resources Houston Chemical, LLC (TCEQ RN102576063) ("FHR") is requesting enforcement discretion due to the impact from COVID-19 (coronavirus) on FHR and/or third-party resources. FHR has implemented a reduced onsite workforce plan necessary to prevent the spread of COVID-19 in the workplace, to protect the health of our employees and third-party resources, and to ensure the continuity of our operations. Summarized below are the details of the request:

- Due to teleworking implemented at the Houston site, FHR is requesting the ability to submit electronically via email any notifications and/or reports required to be submitted via mail or courier in hard copy form. (Reports submitted electronically, i.e., via STEERS, will continue to be submitted electronically.) This request covers reports or notifications under the various environmental permits and/or regulations applicable at the site, including but not limited to:
    - Title V permits: O-1251;
    - NSR permits: 18999;
    - RCRA permit: HW30463;
    - CWA permits: WQ000039300, TXR05DA04;
    - Delegated Federal Environmental Regulations:
        - 40 CFR 60 Subparts A,, Db, Kb, KKKK, VV, VVa, NNN, and RRR;
        - 40 CFR 61 Subparts A, F, V, and FF;
        - 40 CFR 63 A, SS and VVVVVV;
        - 40 CFR Parts 260 – 279;
    - State Environmental Regulations; and
    - Texas Audit Privilege Act.
- FHR also requests to utilize, if necessary, DocuSign® for electronic signatures on any or all electronic submittals.

- FHR anticipates this relief to continue to be necessary during the pendency of telework recommendations by local, state and federal authorities, including but not limited to, the City of Houston, Harris County, the State of Texas and the CDC.
- FHR will submit PDF versions of the report and/or notification via email to the Region 12 appropriate media team email (TCEQR12AIR@tceq.texas.gov, TCEQR12WATER@tceq.texas.gov and TCEQR12WASTE@tceq.texas.gov); to the appropriate TCEQ staff contact, if known; and to EPA Region 6, where copies to EPA are also required.

FHR will maintain adequate records to document activities related to this instance of noncompliance, including details of FHR's efforts to comply.

- If you have any questions or need additional information to approve this request, please contact me via email above or via cell phone at (361) 944-7334.

Regards,
Daren Knowles
Environmental Director
Flint Hills Resources Houston Chemical, LLC

Message

From: Knowles, Daren [Daren.Knowles@fhr.com]
Sent: 4/1/2020 5:08:55 PM
To: OCE@tceq.texas.gov
CC: Ramiro.Garcia@tceq.texas.gov; Seager, Cheryl [Seager.Cheryl@epa.gov]; Nicole.Bealle@tceq.texas.gov; Hutcherson, John [John.Hutcherson@fhr.com]
Subject: COVID-19 Request for Enforcement Discretion

Flint Hills Resources Houston Chemical, LLC (TCEQ RN102576063) ("FHR") is requesting enforcement discretion due to the impact from COVID-19 (coronavirus) on FHR and/or third-party resources. FHR has implemented a reduced onsite workforce plan necessary to prevent the spread of COVID-19 in the workplace, to protect the health of our employees and third-party resources, and to ensure the continuity of our operations. Summarized below are the details of the request:

- Due to teleworking implemented at the Houston site, FHR is requesting the ability to submit electronically via email any notifications and/or reports required to be submitted via mail or courier in hard copy form. (Reports submitted electronically, i.e., via STEERS, will continue to be submitted electronically.) This request covers reports or notifications under the various environmental permits and/or regulations applicable at the site, including but not limited to:
    - Title V permits: O-1251;
    - NSR permits: 18999;
    - RCRA permit: HW30463;
    - CWA permits: WQ000039300, TXR05DA04;
    - Delegated Federal Environmental Regulations:
        - 40 CFR 60 Subparts A,, Db, Kb, KKKK, VV, VVa, NNN, and RRR;
        - 40 CFR 61 Subparts A, F, V, and FF;
        - 40 CFR 63 A, SS and VVVVVV;
        - 40 CFR Parts 260 – 279;
    - State Environmental Regulations; and
    - Texas Audit Privilege Act.
- FHR also requests to utilize, if necessary, DocuSign® for electronic signatures on any or all electronic submittals.
- FHR anticipates this relief to continue to be necessary during the pendency of telework recommendations by local, state and federal authorities, including but not limited to, the City of Houston, Harris County, the State of Texas and the CDC.
- FHR will submit PDF versions of the report and/or notification via email to the Region 12 appropriate media team email (TCEQR12AIR@tceq.texas.gov, TCEQR12WATER@tceq.texas.gov and TCEQR12WASTE@tceq.texas.gov); to the appropriate TCEQ staff contact, if known; and to EPA Region 6, where copies to EPA are also required.

FHR will maintain adequate records to document activities related to this instance of noncompliance, including details of FHR's efforts to comply.

- If you have any questions or need additional information to approve this request, please contact me via email above or via cell phone at (361) 944-7334.

Regards,
Daren Knowles
Environmental Director
Flint Hills Resources Houston Chemical, LLC

Message

From: Tracy Miller [tracy.miller@tceq.texas.gov]
Sent: 4/1/2020 1:41:33 PM
To: Peterson, Brent [Brent.Peterson@fhr.com]
CC: Seager, Cheryl [Seager.Cheryl@epa.gov]; Kathy Sauceda [Kathy.Sauceda@tceq.texas.gov]; Ramiro Garcia [ramiro.garcia@tceq.texas.gov]; Baker, Lance [Lance.Baker@fhr.com]; OCE [OCE@tceq.texas.gov]; Welton, Patricia [Welton.Patricia@epa.gov]; Tonya Baer [Tonya.Baer@tceq.texas.gov]; Susan Johnson [susan.johnson@tceq.texas.gov]; Jayme Sadlier [jayme.sadlier@tceq.texas.gov]; Monica Aplin [Monica.Aplin@tceq.texas.gov]; Jacqueline Cullather [Jacqueline.Cullather@tceq.texas.gov]; Randy Ammons [randy.ammons@tceq.texas.gov]; David Ramirez [david.ramirez@tceq.texas.gov]; Jonathan Walling [jonathan.walling@tceq.texas.gov]; susan.jablonski@tceq.texas.gov
Subject: RE: COVID - 19 Request for Enforcement Discretion
Attachments: Fuel Waiver_3-27.pdf; TCEQ Low RVP Fuel Waiver Request.pdf

Good morning, Mr. Peterson –

I apologize for the delay in responding as we finalized this issue with the EPA. Attached is the guidance related to your request. If you have any additional questions, please let us know.

Regards –
Tracy Miller

Tracy Miller
Special Assistant to the OCE Deputy Director
512.239.4127 Office
512.634.7614 Mobile

From: Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Sent: Friday, March 27, 2020 11:51 AM
To: Peterson, Brent <Brent.Peterson@fhr.com>; OCE <OCE@tceq.texas.gov>
Cc: Seager.cheryl@epa.gov; Kathy Sauceda <Kathy.Sauceda@tceq.texas.gov>; Baker, Lance <Lance.Baker@fhr.com>; Welton, Patricia <Welton.Patricia@epa.gov>; Tonya Baer <Tonya.Baer@tceq.texas.gov>; Tracy Miller <tracy.miller@tceq.texas.gov>; Susan Johnson <susan.johnson@tceq.texas.gov>; Jayme Sadlier <jayme.sadlier@tceq.texas.gov>; Monica Aplin <Monica.Aplin@tceq.texas.gov>; Jacqueline Cullather <Jacqueline.Cullather@tceq.texas.gov>; Randy Ammons <randy.ammons@tceq.texas.gov>; David Ramirez <david.ramirez@tceq.texas.gov>; Jonathan Walling <jonathan.walling@tceq.texas.gov>; Susan Jablonski <susan.jablonski@tceq.texas.gov>
Subject: RE: COVID - 19 Request for Enforcement Discretion

Good morning Mr. Peterson,

This email confirms receipt of your correspondence. TCEQ is working with EPA on this matter and we expect to have guidance soon.

We will keep you posted.

Best regards,

Ramiro Garcia, Jr.
Deputy
Office of Compliance & Enforcement
TCEQ

From: Peterson, Brent <Brent.Peterson@fhr.com>
Sent: Friday, March 27, 2020 10:51 AM
To: OCE <OCE@tceq.texas.gov>
Cc: Ramiro Garcia <ramiro.garcia@tceq.texas.gov>; Seager.cheryl@epa.gov; Kathy Sauceda <Kathy.Sauceda@tceq.texas.gov>; Baker, Lance <Lance.Baker@fhr.com>
Subject: COVID - 19 Request for Enforcement Discretion

To whom it may concern –

Please see the attached request for Enforcement Discretion related to Covid-19. Please feel free to contact me with any questions or concerns.

Thank you for your time and assistance with this.

Brent Peterson
Environmental Manager
Flint Hills Resources – Pipelines and Terminals
(817) 685-3487 work
(817) 716-5173 cell
Brent.peterson@fhr.com

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 27, 2020

THE ADMINISTRATOR

Re: May 1, 2020 Fuel Waiver Concerning Summer Gasoline

Dear Governors and Mayor Bowser:

The U.S. Environmental Protection Agency, in consultation with the U.S. Department of Energy and representatives of the various states, has been working to evaluate fuel supply problems caused by the novel Coronavirus Disease (COVID-19) outbreak. Based on this evaluation, the EPA has determined, and DOE concurs, that it is necessary to waive certain federal fuel standards under the Clean Air Act (CAA) to minimize or prevent the disruption of an adequate supply of gasoline throughout the United States. This waiver only applies to the federal fuel standards. Regulated parties must continue to comply with any applicable state or local requirements, or restrictions related to this matter, unless waived by the appropriate authorities.

As you know, regulations promulgated under the CAA require the use of low volatility gasoline during the summer months in order to limit the formation of ozone pollution. The regulations requiring the use of low volatility conventional gasoline during the summer season are found at 40 C.F.R. § 80.27 and in certain State Implementation Plans (SIPs). *See* 40 C.F.R. § 80.27 and https://www.epa.gov/gasoline-standards/gasoline-reid-vapor-pressure#table. The regulations requiring the use of low volatility reformulated gasoline (RFG) are found at 40 C.F.R. § 80.78 and in certain SIPs. The RFG regulations at 40 C.F.R. § 80.78(a)(7) also prohibit any person from combining any reformulated blendstock for oxygenate blending (RBOB) with any other gasoline, blendstock, or oxygenate, except for the oxygenate of the type and amount specified by the refiner that produced the RBOB. RBOB is combined with its specified oxygenate to produce RFG.[1]

The low volatility gasoline regulations apply to refiners, importers, distributors, resellers, terminal owners and operators, and carriers beginning on May 1 and to retailers and wholesale purchaser-consumers beginning on June 1. The regulations impose a two-date system that requires parties upstream of retailers and wholesale purchaser-consumers to turn over their storage tanks to low volatility summer gasoline and stop selling higher volatility winter gasoline by May 1 so that retailers and wholesale purchaser-consumers can meet the applicable low volatility gasoline standards by the June 1 deadline.

The COVID-19 outbreak has been identified in all 50 United States and the District of Columbia. The United States and several states have declared States of Emergency. Federal, state, and local governments have taken action to meet Centers for Disease Control and Prevention guidelines requiring social distancing and implement policies to reduce transmission of

[1] Alaska, Hawaii, and U.S. territories are exempted from federal volatility regulations.

COVID-19. The COVID-19 outbreak and the associated precautions have caused a dramatic decrease in the demand for gasoline which is preventing regulated parties upstream of retailers and wholesale purchaser-consumers from selling winter gasoline in their storage tanks and turning their storage tanks over to compliant summer gasoline by May 1, 2020. Without a waiver of the summer gasoline requirements, these regulated parties would be required to stop selling winter gasoline in their storage tanks on May 1, 2020, which would prevent them from loading summer gasoline into their storage tanks and result in a shortage of compliant summer gasoline. These supply shortages can be alleviated by waiving the requirements to sell summer gasoline and by waiving provisions at 40 C.F.R. § 80.78(a)(7) that prohibit any person from combining any RFG blendstock for oxygenate blending with any other gasoline, blendstock, or oxygenate, unless certain conditions are met.

I have determined that an "extreme and unusual fuel [ ] supply circumstance" exists that will prevent the distribution of an adequate supply of compliant gasoline to consumers. CAA § 211(c)(4)(C)(ii)(I), 42 U.S.C. § 7545(c)(4)(C)(ii)(I). This extreme and unusual fuel circumstance is the result of an outbreak of COVID-19, an event that could not reasonably have been foreseen or prevented, and is not attributable to a lack of prudent planning on the part of suppliers of the fuel to these areas. CAA § 211(c)(4)(C)(ii)(II), 42 U.S.C. § 7545(c)(4)(C)(ii)(II). Furthermore, I have determined that it is in the public interest to grant this waiver and that this waiver applies to the smallest geographic area necessary to address the fuel supply circumstances. CAA § 211(c)(4)(C)(ii)(III) and (iii)(I), 42 U.S.C. § 7545(c)(4)(C)(ii)(III) and (iii)(I).

The EPA, in consultation with DOE, has evaluated the impact of disruption of the fuel production and distribution system on fuel supply throughout the United States. Based on this evaluation, the EPA has determined, and DOE concurs, that it is necessary to take the following action to minimize or prevent further disruption of an adequate supply of gasoline to consumers.

Federal RVP Standards

I am issuing this waiver of the federal Reid vapor pressure (RVP) requirements at 40 C.F.R. § 80.27 that apply to terminal owners, terminal operators, distributors, carriers, retailers, and wholesale purchaser-consumers throughout the United States to minimize or prevent problems with the supply of gasoline.

Reformulated Gasoline

I am issuing this waiver of the federal RFG requirements in all RFG covered areas that apply to terminal owners, terminal operators, distributors, carriers, retailers, and wholesale purchaser-consumers. Additionally, I am waiving the provisions at 40 C.F.R. § 80.78(a)(7) that prohibit any person from combining any RFG blendstock for oxygenate blending with any other gasoline, blendstock, or oxygenate, unless certain conditions are met.

Federally-Enforceable SIP Covered Areas

I am issuing this waiver of all low volatility gasoline requirements and RFG requirements in any federally-enforceable SIP that apply to terminal owners, terminal operators, distributors,

carriers, retailers and wholesale purchaser consumers to minimize or prevent problems with the supply of gasoline.

Waiver Conditions

Since this waiver is designed to facilitate the turnover of storage tanks from winter to summer gasoline, the waiver does not permit refiners to produce gasoline after May 1, 2020 that exceeds the applicable summer gasoline volatility standards, and does not permit any party to add butane to previously certified conventional gasoline if the butane would cause the gasoline to exceed the applicable summer gasoline volatility standards.[2] This waiver is effective May 1, 2020 and will continue through May 20, 2020. Gasoline that does not meet the low volatility requirements may not be introduced into terminal storage tanks from which gasoline is dispensed into trucks for distribution to retail outlets after May 20, 2020. Any gasoline meeting the conditions of this waiver that is stored in terminal storage tanks for distribution to retail outlets and wholesale purchaser-consumers in these areas after May 20, 2020, may be distributed and sold until the supply is depleted. Likewise, retailers and wholesale purchaser-consumers in these areas may continue selling or dispensing gasoline that meets the conditions of this waiver after May 20, 2020, until their supplies are depleted.

The EPA recognizes that this is an evolving situation that is causing rapid changes to market dynamics. Should conditions warrant, this waiver may be modified, terminated or extended, as appropriate. If you have questions you may call me, or your staff may call Phillip Brooks at (202) 564-0652.

Sincerely,

Andrew R. Wheeler

Enclosure

1. Addressees

cc: The Honorable Dan Brouillette, Secretary of Energy

[2] Note that the RFG regulations at 40 C.F.R. § 80.82(e)(2) imposes restrictions on blending butane into previously certified RFG or RBOB and that prohibition continues to apply and is not waived. This section of the regulation states: "Butane may not be blended with any reformulated gasoline or RBOB during the period April 1 through September 30, or with any reformulated gasoline or RBOB designated as VOC-controlled, under this section."

The Honorable Kay Ivey
Governor of Alabama
State Capitol
600 Dexter Avenue
Montgomery, Alabama 36130

The Honorable Doug Ducey
Governor of Arizona
State Capitol
1700 W. Washington
Phoenix, Arizona 85007

The Honorable Asa Hutchinson
Governor of Arkansas
State Capitol
500 Woodlane Avenue, Room 250
Little Rock, Arkansas 77201

The Honorable Gavin Newsom
Governor of California
State Capitol
1303 10th Street, #1173
Sacramento, California 95814

The Honorable Jared Polis
Governor of Colorado
200 E. Colfax, Room #136
Denver, Colorado 80203

The Honorable Ned Lamont
Governor of Connecticut
210 Capitol Avenue
Hartford, Connecticut 06106

The Honorable John Carney
Governor of Delaware
Legislative Hall
Dover, Delaware 19901

The Honorable Muriel Bowser
Mayor of the District of Columbia
1350 Pennsylvania Avenue NW
Suite 316
Washington, D.C. 20004

The Honorable Ron DeSantis
Governor of Florida
PL 05 The Capitol
400 S. Monroe Street
Tallahassee, Florida 32399

The Honorable Brian Kemp
Governor of Georgia
203 State Capitol
206 Washington Street
Atlanta, Georgia 30334

The Honorable Brad Little
Governor of Idaho
700 W. Jefferson, 2nd Floor
Boise, Idaho 83702

The Honorable JB Pritzker
Governor of Illinois
State Capitol
207 Statehouse
Springfield, Illinois 62706

The Honorable Eric Holcomb
Governor of Indiana
State House, Room #206
Indianapolis, Indiana 46204

The Honorable Kim Reynolds
Governor of Iowa
State Capitol
1007 E. Grand Avenue
Des Moines, Iowa 50319

The Honorable Laura Kelly
Governor of Kansas
Capitol
300 SW 10th Avenue, #212S
Topeka, Kansas 66612

The Honorable Andy Beshear
Governor of Kentucky
700 Capitol Avenue, #100
Frankfort, Kentucky 40601

The Honorable John Bel Edwards
Governor of Louisiana
Box 94004
Baton Rouge, Louisiana 70804

The Honorable Janet Mills
Governor of Maine
1 State House Station
Augusta, Maine 04333

The Honorable Larry Hogan
Governor of Maryland
State House
100 State Circle
Annapolis, Maryland 21401

The Honorable Charlie Baker
Governor of Massachusetts
State House, Room #360
Boston, Massachusetts 02133

The Honorable Gretchen Whitmer
Governor of Michigan
Box 30013
Lansing, Michigan 48909

The Honorable Tim Walz
Governor of Minnesota
130 State Capitol
75 Rev. Martin Luther King, Jr. Boulevard
St. Paul, Minnesota 55155

The Honorable Tate Reeves
Governor of Mississippi
Box 139
Jackson, Mississippi 39205

The Honorable Mike Parson
Governor of Missouri
Capitol Building
Room 216, Box 720
Jefferson City, Missouri 65102

The Honorable Steve Bullock
Governor of Montana
State Capitol
P.O. Box 200801
Helena, Montana 59620

The Honorable Pete Ricketts
Governor of Nebraska
Box 94848
Lincoln, Nebraska 68509

The Honorable Steve Sisolak
Governor of Nevada
Capitol Building
101 North Carson Street
Carson City, Nevada 89701

The Honorable Chris Sununu
Governor of New Hampshire
107 N. Main Street, Room #208
Concord, New Hampshire 03301

The Honorable Phil Murphy
Governor of New Jersey
The State House
Box 001
Trenton, New Jersey 08625

The Honorable Michelle Lujan Grisham
Governor of New Mexico
State Capitol
4th Floor
490 Old Santa Fe Trail
Santa Fe, New Mexico 87501

The Honorable Andrew Cuomo
Governor of New York
State Capitol
Albany, New York 12224

The Honorable Roy Cooper
Governor of North Carolina
20301 Mail Service Center
Raleigh, North Carolina 27699

The Honorable Doug Burgum
Governor of North Dakota
Department 101
600 E. Boulevard Avenue
Bismark, North Dakota 58505

The Honorable Mike DeWine
Governor of Ohio
30th Floor
77 S. High Street
Columbus, Ohio 43215

The Honorable Kevin Stitt
Governor of Oklahoma
Capitol Building
2300 Lincoln Boulevard, Room #212
Oklahoma City, Oklahoma 73105

The Honorable Kate Brown
Governor of Oregon
State Capitol
900 Court Street, NE, #254
Salem, Oregon 97301

The Honorable Tom Wolf
Governor of Pennsylvania
Room #225
508 Main Capitol Building
Harrisburg, Pennsylvania 17120

The Honorable Gina Raimondo
Governor of Rhode Island
State House
82 Smith Street
Providence, Rhode Island 02903

The Honorable Henry McMaster
Governor of South Carolina
1205 Pendleton Street
Columbia, South Carolina 29201

The Honorable Kristi Noem
Governor of South Dakota
500 E. Capitol Avenue
Pierre, South Dakota 57501

The Honorable Bill Lee
Governor of Tennessee
Tennessee State Capitol
Nashville, Tennessee 37243

The Honorable Greg Abbott
Governor of Texas
Box 12428
Austin, Texas 78711

The Honorable Gary R. Herbert
Governor of Utah
Utah State Capitol, #200
Salt Lake City, Utah 84114

The Honorable Phil Scott
Governor of Vermont
109 State Street
Pavilion Office Building
Montpelier, Vermont 05609

The Honorable Ralph Northam
Governor of Virginia
State Capitol, Box 1475, 3rd Floor
Richmond, Virginia 23219

The Honorable Jay Inslee
Governor of Washington
Box 40002
Olympia, Washington 98504

The Honorable Jim Justice
Governor of West Virginia
1900 Kanawha Street
Charleston, West Virginia 25305

The Honorable Tony Evers
Governor of Wisconsin
115 E. State Capitol
Madison, Wisconsin 53707

The Honorable Mark Gordon
Governor of Wyoming
State Capitol Building
200 W. 24th Street, Room #124
Cheyenne, Wyoming 82002

Dear Toby Baker, Executive Director,
Texas Commission on Environmental Quality:

The Office of the Governor has received the Texas Commission on Environmental Quality's (TCEQ) request to temporarily waive state low Reid Vapor Pressure (RVP) fuel requirements found at 30 Texas Administrative Code (TAC) Subchapter H, Division 1, § 114.301 and 30 TAC Subchapter C, Division 5 § 115.252. The TCEQ asserts that strict compliance with these laws could prevent, hinder, or delay entities regulated by the TCEQ in relation to efforts to respond to COVID-19.

Any gasoline meeting the conditions of this waiver that is stored in terminal storage tanks for distribution to retail outlets and wholesale purchaser-consumers in counties[1] subject to Texas's low RVP fuel requirements after May 20, 2020 may be distributed and sold until the supply is depleted. Likewise, retailers and wholesale purchasers in these areas may continue selling or dispensing gasoline that meets the conditions of this waiver after May 20, 2020 until their supplies are depleted. Further, any requirements included in New Source Review permits that reference or otherwise incorporate the low RVP requirements in 30 TAC Subchapter H, Division 1, § 114.301 and 30 TAC Subchapter C, Division 5 § 115.252, the federal low RVP requirements at 40 Code of Federal Regulations § 80.27, or low RVP requirements in ASTM D4814, will not apply during the waiver period.

In accordance with section 418.016 of the Texas Government Code, the Office of the Governor grants the TCEQ's request to suspend 30 TAC Subchapter H, Division 1, § 114.301 and 30 TAC Subchapter C, Division 5 § 115.252. This waiver is effective as of April 1, 2020, and then will run concurrently with the U.S. Environmental Protection Agency's waiver of low RVP fuel requirements, which is currently expected to end on May 20, 2020, unless otherwise terminated by the Office of the Governor.

Thank you,

Jordan A. Rodriguez, Budget and Policy Advisor
Office of Governor Greg Abbott
March 31, 2020

---

[1] Anderson, Angelina, Aransas, Atascosa, Austin, Bastrop, Bee, Bell, Bexar, Bosque, Bowie, Brazos, Burleson, Caldwell, Calhoun, Camp, Cass, Cherokee, Colorado, Comal, Cooke, Coryell, De Witt, Delta, Ellis, Falls, Fannin, Fayette, Franklin, Freestone, Goliad, Gonzales, Grayson, Gregg, Grimes, Guadalupe, Harrison, Hays, Henderson, Hill, Hood, Hopkins, Houston, Hunt, Jackson, Jasper, Johnson, Karnes, Kaufman, Lamar, Lavaca, Lee, Leon, Limestone, Live Oak, Madison, Marion, Matagorda, McLennan, Milam, Morris, Nacogdoches, Navarro, Newton, Nueces, Panola, Parker, Polk, Rains, Red River, Refugio, Robertson, Rockwall, Rusk, Sabine, San Augustine, San Jacinto, San Patricio, Shelby, Smith, Somervell, Titus, Travis, Trinity, Tyler, Upshur, Van Zandt, Victoria, Walker, Washington, Wharton, Williamson, Wilson, Wise, and Wood.

Message

From: Ramiro Garcia [ramiro.garcia@tceq.texas.gov]
Sent: 3/31/2020 7:59:49 PM
To: Maxwell, Benji [Benji.Maxwell@fhr.com]; OCE [OCE@tceq.texas.gov]
CC: Seager, Cheryl [Seager.Cheryl@epa.gov]; Leroy Biggers [leroy.biggers@tceq.texas.gov]; Shelton, Bill [Bill.Shelton@fhr.com]; Tracy Miller [tracy.miller@tceq.texas.gov]; Susan Johnson [susan.johnson@tceq.texas.gov]; Jayme Sadlier [jayme.sadlier@tceq.texas.gov]; Jonathan Walling [jonathan.walling@tceq.texas.gov]; Cynthia Gandee [cynthia.gandee@tceq.texas.gov]
Subject: RE: COVID-19 Request for Enforcement Discretion

Hello Mr. Maxwell,

This email confirms receipt of your correspondence. We are reviewing your request and expect to have a response soon.

Best regards,

Ramiro Garcia, Jr.
Deputy
Office of Compliance & Enforcement
TCEQ

From: Maxwell, Benji <Benji.Maxwell@fhr.com>
Sent: Tuesday, March 31, 2020 12:22 PM
To: OCE <OCE@tceq.texas.gov>
Cc: Ramiro Garcia <ramiro.garcia@tceq.texas.gov>; Seager.Cheryl@epa.gov; Leroy Biggers <leroy.biggers@tceq.texas.gov>; Shelton, Bill <Bill.Shelton@fhr.com>
Subject: COVID-19 Request for Enforcement Discretion

Flint Hills Resources Longview, LLC ("FHR") has experienced or is anticipating an instance of noncompliance that was unavoidable due to the impact from the COVID-19 (coronavirus) on FHR and/or third-party resources. FHR has implemented a corporate-wide policy to restrict travel of all employees, such restriction being necessary to prevent the spread of COVID-19 in the workplace, to protect the health of our employees and third-party resources, and to ensure the continuity of our operations. Summarized below are the details of the request:

- Method 9 Opacity Readings as found in 30 TAC 111.111(a) – Visible Emissions for Specified Sources and the associated Title V (01282) and state NSR permit (18105) that incorporate these or similar requirements for Method 9 opacity readings.
    - FHR has one Method 9 certified opacity reader. The semi-annual certification for that individual has expired as of 12-18-2019. Due to the travel restrictions implemented by FHR, consistent with recommendations from local, state and federal authorities, FHR personnel were not able to attend "Smoke School" in March 2020 to be certified/re-certified.
    - In the interim, FHR has contacted a third-party consulting firm to contract the required Method 9 readings. FHR intends to utilize third-party certified opacity readers, as long as they are available when needed.
    - However, in the event, certified third-party opacity readers are not available when needed, FHR is seeking enforcement discretion to allow the FHR employee that was previously certified to conduct Method 9 observations with an expired certification.
- FHR expects the duration of this request to be until travel restrictions are lifted and training can be rescheduled.
- There are 5 points that require Method 9 quarterly observations.
- FHR will maintain adequate records to document activities related to this instance of noncompliance, including details of FHR's efforts to comply.

If you have any questions about this request or need additional information, please contact me at the email above, or via cell phone at 903-309-8407.

Regards,
Benji Maxwell

Message

From: Maxwell, Benji [Benji.Maxwell@fhr.com]
Sent: 3/31/2020 5:21:34 PM
To: oce@tceq.texas.gov
CC: Ramiro.Garcia@tceq.texas.gov; Seager, Cheryl [Seager.Cheryl@epa.gov]; leroy.biggers@tceq.texas.gov; Shelton, Bill [Bill.Shelton@fhr.com]
Subject: COVID-19 Request for Enforcement Discretion

Flint Hills Resources Longview, LLC ("FHR") has experienced or is anticipating an instance of noncompliance that was unavoidable due to the impact from the COVID-19 (coronavirus) on FHR and/or third-party resources. FHR has implemented a corporate-wide policy to restrict travel of all employees, such restriction being necessary to prevent the spread of COVID-19 in the workplace, to protect the health of our employees and third-party resources, and to ensure the continuity of our operations. Summarized below are the details of the request:

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    - FHR has one Method 9 certified opacity reader. The semi-annual certification for that individual has expired as of 12-18-2019. Due to the travel restrictions implemented by FHR, consistent with recommendations from local, state and federal authorities, FHR personnel were not able to attend "Smoke School" in March 2020 to be certified/re-certified.
    - In the interim, FHR has contacted a third-party consulting firm to contract the required Method 9 readings. FHR intends to utilize third-party certified opacity readers, as long as they are available when needed.
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- FHR expects the duration of this request to be until travel restrictions are lifted and training can be rescheduled.
- There are 5 points that require Method 9 quarterly observations.
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If you have any questions about this request or need additional information, please contact me at the email above, or via cell phone at 903-309-8407.

Regards,
Benji Maxwell

Message

From: Ramiro Garcia [ramiro.garcia@tceq.texas.gov]
Sent: 3/27/2020 4:51:29 PM
To: Peterson, Brent [Brent.Peterson@fhr.com]; OCE [OCE@tceq.texas.gov]
CC: Seager, Cheryl [Seager.Cheryl@epa.gov]; Kathy Sauceda [Kathy.Sauceda@tceq.texas.gov]; Baker, Lance [Lance.Baker@fhr.com]; Welton, Patricia [Welton.Patricia@epa.gov]; Tonya Baer [Tonya.Baer@tceq.texas.gov]; Tracy Miller [tracy.miller@tceq.texas.gov]; Susan Johnson [susan.johnson@tceq.texas.gov]; Jayme Sadlier [jayme.sadlier@tceq.texas.gov]; Monica Aplin [Monica.Aplin@tceq.texas.gov]; Jacqueline Cullather [Jacqueline.Cullather@tceq.texas.gov]; Randy Ammons [randy.ammons@tceq.texas.gov]; David Ramirez [david.ramirez@tceq.texas.gov]; Jonathan Walling [jonathan.walling@tceq.texas.gov]; susan.jablonski@tceq.texas.gov
Subject: RE: COVID - 19 Request for Enforcement Discretion

Good morning Mr. Peterson,

This email confirms receipt of your correspondence. TCEQ is working with EPA on this matter and we expect to have guidance soon.

We will keep you posted.

Best regards,

Ramiro Garcia, Jr.
Deputy
Office of Compliance & Enforcement
TCEQ

From: Peterson, Brent <Brent.Peterson@fhr.com>
Sent: Friday, March 27, 2020 10:51 AM
To: OCE <OCE@tceq.texas.gov>
Cc: Ramiro Garcia <ramiro.garcia@tceq.texas.gov>; Seager.cheryl@epa.gov; Kathy Sauceda <Kathy.Sauceda@tceq.texas.gov>; Baker, Lance <Lance.Baker@fhr.com>
Subject: COVID - 19 Request for Enforcement Discretion

To whom it may concern –

Please see the attached request for Enforcement Discretion related to Covid-19. Please feel free to contact me with any questions or concerns.

Thank you for your time and assistance with this.

Brent Peterson
Environmental Manager
Flint Hills Resources – Pipelines and Terminals
(817) 685-3487 work
(817) 716-5173 cell
Brent.peterson@fhr.com

Message

From: Peterson, Brent [Brent.Peterson@fhr.com]
Sent: 3/27/2020 3:50:33 PM
To: OCE@tceq.texas.gov
CC: ramiro.garcia@tceq.texas.gov; Seager, Cheryl [Seager.Cheryl@epa.gov]; Kathy Sauceda [Kathy.Sauceda@tceq.texas.gov]; Baker, Lance [Lance.Baker@fhr.com]
Subject: COVID - 19 Request for Enforcement Discretion
Attachments: COVID19 ED request FHR PT RVP.docx

To whom it may concern –

Please see the attached request for Enforcement Discretion related to Covid-19. Please feel free to contact me with any questions or concerns.

Thank you for your time and assistance with this.

Brent Peterson
Environmental Manager
Flint Hills Resources – Pipelines and Terminals
(817) 685-3487 work
(817) 716-5173 cell
Brent.peterson@fhr.com

From: brent.peterson@fhr.com
Sent: March 27, 2020
To: [HYPERLINK "mailto:OCE@tceq.texas.gov" \h]**Cc:** Ramiro.Garcia@tceq.texas.gov; Seager.Cheryl@epa.gov; kathy.sauceda@tceq.texas.gov; Lance.Baker@fhr.com

Subject: COVID-19 Request for Enforcement Discretion

Flint Hills Resources Corpus Christi, LLC (CN 603741463) - Pipeline and Terminals Group ("FHR") is requesting enforcement discretion due to the impact from the COVID-19 (coronavirus) on FHR's fuels terminals. Specifically, since demand for gasoline has dropped by approximately 40% over the last week, higher than normal inventories of winter grade RVP gas remain in some storage tanks and may still be present in the tanks for several weeks.

- The following locations have been or have the potential to be affected by the significant decrease in gasoline demand and may not be able to meet the RVP seasonal limits, and associated site, storage tank and MSS emissions limits, as required by USEPA, TCEQ, site air operating permits, and Title 4, Part 1, Chapter 5, Section 5.7(a) of the Texas Administrative Code:
    - Fort Worth Terminal, RN102496684
    - Waco Terminal, RN102287828
    - Austin Terminal, RN101059673
    - Taylor Terminal, RN110431640
    - San Antonio Terminal, RN101058733
    - Mustang Ridge Terminal, RN105366934

- FHR anticipates this relief to continue to be necessary through at least 6/1/2020 to allow demand to return to typical levels. FHR will continue to monitor gasoline inventories and RVP values of stored gasoline throughout this period.
- FHR would also like to note that the Texas Department of Licensing & Regulation has suspended enforcement of the RVP limits during this pandemic and disaster declaration.

At this time, FHR is continuing operations as the Oil and Gas industry has been designated as critical infrastructure in the Energy Sector. FHR will maintain adequate records to document activities related to this instance of noncompliance.

Regards,

Brent Peterson
Environmental Manager
Flint Hills Resources, LP

Appointment

From: Wilwerding, Joseph [Wilwerding.Joseph@epa.gov]

Subject: FOR INFORMATION: Bodine: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program
Attachments: oecamemooncovid19implications.pdf

Start: 3/26/2020 8:19:00 PM
End: 3/26/2020 8:19:00 PM
Show Time As: Tentative

Recurrence: (none)

From: Bodine, Susan <bodine.susan@epa.gov>
Sent: Thursday, March 26, 2020 2:19 PM
To: OECA All <OECA_All@epa.gov>; Regional Counsels and Deputies <Regional_Counsels_and_Deputies@epa.gov>; ECAD Directors and Deputies-Designees <ECAD_Directors_and_Deputies-Designees@epa.gov>; Enforcement Coordinators <Enforcement_Coordinators@epa.gov>; Leadership_Assistant_Administrators <Leadership_Assistant_Administrators@epa.gov>; Leadership_Deputy_Assistant_Administrators <Leadership_Deputy_Assistant_Administrators@epa.gov>; Leadership_Regional_Administrators <Leadership_Regional_Administrators@epa.gov>; Leadership_Deputy_Regional_Administrators <Leadership_Deputy_Regional_Administrators@epa.gov>; Regional Enforcement Staff <Regional_Enforcement_Staff@epa.gov>; Regional Enforcement Manager Contacts <Regional_Enforcement_Manager_Contacts@epa.gov>; Gunasekara, Mandy <gunasekara.Mandy@epa.gov>
Subject: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program

Colleagues:

As you know, ongoing efforts to limit the spread of COVID-19 have created unprecedented challenges for the regulated community. We remain mindful of the health and safety of the public, as well as our staff, and those of other Federal Agencies, State and Local Governments, Tribes, Regulated Entities, Contractors, and Non-governmental Organizations. We are taking these important considerations into account as we all continue our work to protect human health and the environment. Accordingly, we have developed a temporary policy regarding EPA enforcement of environmental legal obligations during the COVID-19 pandemic.

EPA will assess the continued need for and scope of this temporary policy on a regular basis and will update it if EPA determines modifications are necessary.

Susan

Susan Parker Bodine
Assistant Administrator
Office of Enforcement and Compliance Assurance
202-564-2440

Message

From: Saunders, Jerry [Saunders.Jerry@epa.gov]
Sent: 4/1/2020 1:55:40 PM
To: blanz@adeq.state.ar.us; Shellie Chard [Shellie.Chard@deq.ok.gov]; Bryan Sinclair [bryan.sinclair@tceq.texas.gov]; Angela Marse [Angela.Marse@LA.GOV]; Roose, Rebecca, NMENV [Rebecca.Roose@state.nm.us]
CC: Seager, Cheryl [Seager.Cheryl@epa.gov]; Herrera, Esteban [Herrera.Esteban@epa.gov]; Gilrein, Stephen [gilrein.stephen@epa.gov]
Subject: Guidance on NPDES reporting
Attachments: Advisory for NPDES 1Reporting per Coronavirus - 2final as of March 31 2020.pdf

Attached is the guidance that was signed on March 31,2020 dealing with NPDES reporting and ICIS coding.
I understand OECA will be coming out with some FAQs with answers in the near future.
If you have questions, please contact me or Esteban Herrera. We will work with you to try to get you answers.

Thank you

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

March 31, 2020

SUBJECT: Temporary Advisory for National Pollutant Discharge Elimination System (NPDES) Reporting in Response to COVID-19 Pandemic

FROM: David A. Hindin
Director, Office of Compliance

TO: Authorized NPDES Programs and U.S. EPA Regions

On March 26, 2020, EPA's Assistant Administrator for Enforcement and Compliance Assurance, issued a Temporary Policy titled "COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program". This EPA Temporary Policy applies retroactively beginning on March 13, 2020 and until further notice. EPA established this Temporary Policy to describe how EPA will exercise its enforcement discretion for noncompliance with routine monitoring and reporting requirements resulting from the COVID-19 pandemic, if regulated entities take the applicable steps set forth in the policy. The Temporary Policy also states that EPA may exercise enforcement discretion for other noncompliance, but those decisions will be made on a case-by-case basis. The Temporary Policy explains entities subject to EPA requirements should make every effort to comply with their environmental compliance obligations. If compliance is not reasonably practicable, facilities with such obligations should act responsibly, document and maintain records of instances of noncompliance and return to compliance as soon as practicable. The Temporary Policy notes that authorized states or tribes can choose to take a different approach under their own authorities.

Consistent with the Temporary Policy, this temporary Reporting Advisory provides further direction to EPA Regional Offices on how to implement the Temporary Policy as it relates to NPDES reporting requirements that are tracked in EPA's Integrated Compliance Information System for the NPDES program (ICIS-NPDES). In addition, it provides recommendations to authorized NPDES Programs who may be addressing similar questions regarding NPDES reporting. EPA strongly encourages authorized states to follow this Advisory to ensure consistent national data.

EPA has received numerous inquiries from authorized NPDES Programs regarding actual or potential noncompliance with NPDES monitoring, sampling, and reporting requirements that could occur as a result of COVID-19. This Advisory pertains specifically to scenarios impacting a NPDES permittee's ability to perform required monitoring, sampling and reporting, in addition to an authorized NPDES Program's ability to report to EPA in a timely manner as required by 40 CFR part 127 (NPDES eRule). In many cases, the failure to report to ICIS-NPDES using an electronic reporting tool (e.g., NetDMR) or by an authorized NPDES Program will result in the automatic generation of non-receipt violations. Under any circumstance, 40 CFR § 122.41(l)(6) and (7) create standard conditions in all permits that require permittees to report all noncompliance.

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Authorized NPDES Programs and EPA Regions should advise permittees, in cases where the permittees can report, that they are expected to report the data they do have for the monitoring period (even if the monitoring data is incomplete in whole or part). If data is missing because of the COVID-19 pandemic as set forth in the Temporary Policy, EPA strongly encourages that permittees and authorized NPDES Programs use a No Data Indicator code that was created specifically for response to the COVID-19 situation. Table 1 lists a subset of available NODI codes relevant to this situation including the COVID-19 code. In addition to use of the COVID-19 code, the regulatory authority should instruct permittees to include the following comment on their DMR form: "COVID-19." Using the COVID-19 code indicates the permittee believes the Temporary Policy applies to their routine monitoring or sampling noncompliance. The ICIS-NPDES data system will not automatically identify a DMR non-receipt violation if the COVID-19 code is used. Instead, EPA and authorized NPDES Programs may use the COVID-19 code if follow-up is needed to determine if the criteria set forth in the Temporary Policy for use of enforcement discretion are met.

For authorized state NPDES Programs that are not able to readily add this new code to their list of available NODI codes, EPA recommends the use of NODI code "K," Natural Disaster, or other infrequently used valid code (i.e., one that does not automatically generate a violation). The objective is to use a code consistently to make the data more easily retrievable for follow-up if needed.

Table 1 – Subset of Available No Data Indicator codes:

Code	Description	Violation Generated (Yes/No)
2	Operation Shut Down	No
3	Special Report Attached	No
8	Other (See Comments)	Yes
C	No Discharge	No
D	Lost Sample/Data Not Available	Yes
E	Analysis Not Conducted/No Sample	Yes
G	Sampling Equipment Failure	Yes
K	**Natural Disaster**	**No**
M	Laboratory Error	Yes
R	Administratively Resolved (not available in NetDMR)	No
Z	**COVID-19**	**No**

If an electronic reporting tool is unavailable or a permittee is not able to report electronically, 40 CFR part 127 provides flexibility to EPA and authorized NDPES Programs to grant temporary or emergency waivers from electronic reporting. To obtain a temporary electronic reporting waiver, permittees must submit an electronic reporting waiver request to EPA or their authorized NPDES Program. Authorized NPDES Programs can grant emergency waivers up to 60 days at a time and should notify permittees if they are covered by an emergency waiver from electronic reporting. An example waiver request is available at: https://www.epa.gov/compliance/npdes-ereporting-information-permittees-and-other-regulated-entities.

If a permittee is unable to timely report electronically and unable to obtain a waiver to report on paper, authorized NPDES Programs and EPA Regions should advise those permittees, consistent with the Temporary Policy, 1) to continue to make every effort to comply with their environmental compliance obligations; 2) return to compliance as soon as possible; 3) document and report any instances of noncompliance including the nature and dates of the noncompliance as required by any applicable permit or regulations using existing procedures (e.g., verbal notice); 4) act responsibly under the circumstances in order to minimize the effects and duration of any noncompliance caused by COVID-19; 5) document how COVID-19 was the cause of the noncompliance, and the decisions and actions taken in response; and 6) report any missing DMR or other required report as soon as practicable to show that the data was received even if late and to document that noncompliance was caused by

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COVID-19. In addition, the authorized NPDES Program or EPA Region as applicable will also need to consider whether the permit contains any specific permit conditions that might address these unusual circumstances.

The general principles established by this Advisory address scenarios where the EPA's ICIS-NPDES data system will identify violations when a value for discharge monitoring data is expected but not received either from a regulated entity using an electronic reporting tool like NetDMR or from an authorized NPDES Program. In addition to the criteria set forth in the Temporary Policy, Table 2 provides reporting instructions related to specific scenarios already raised to EPA.

Table 2 – Example Scenarios Created by COVID-19 Pandemic	
Scenario	Recommended Response by the Permittee
1) A permittee can report, but not electronically	Request a waiver from electronic reporting and report on paper
2) A permittee is not able to sample or monitor, but can report electronically	Report as required; use applicable NODI code where needed; include comment on DMR form
3) A laboratory is not available to complete analyses of samples	Report as required; use applicable NODI code where needed; include comment on DMR form
4) A permittee is not able to sample, monitor and report	Follow criteria set forth in the Temporary Policy and report when possible, which might include use of NODI codes with necessary comments and attachments.
5) No authorized official is available to sign a required form or report	See above where a permittee is not able to report. If a wet-ink signature is required for processing signatory requests, it should be sent in accordance with existing procedures with a scanned version sent to the appropriate authorized NPDES Program or EPA Region to expedite processing.

When an authorized NPDES Program cannot report collected information to ICIS, reporting should be completed as soon as possible. If an authorized NPDES Program expects to send a high volume of data within a short period, please contact the Office of Compliance by sending an email to ICIS@epa.gov to coordinate.

As noted earlier, 40 CFR § 122.41(l)(6) and (7) are standard permit conditions in all permits that require permittees to report all noncompliance. Authorized NPDES Programs should determine the appropriate response to any noncompliance reported under these provisions or any violations generated to ensure proper and timely resolution.

This temporary Reporting Advisory is effective for the same period as the Temporary Policy (starting March 13, 2020) and it will continue until the Temporary Policy is terminated. This Advisory is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity against the United States, its departments, agencies, entities, officers, employees, or agents, or any other person.

Additional guidance is available to Authorized NPDES Programs regarding how they should manage data for unusual circumstances at:
https://www.epa.gov/sites/production/files/2017-01/documents/npdesereporting-dataentryguidance.pdf

Specific questions about this Advisory should be directed to the ICIS Help Desk using ICIS@epa.gov.

Electronic Link:
Temporary Policy titled "COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program"

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Message

From: Seager, Cheryl [Seager.Cheryl@epa.gov]
Sent: 3/31/2020 7:46:36 PM
To: Lourdes Iturralde [Lourdes.Iturralde@LA.GOV]; Ramiro.Garcia@tceq.texas.gov
CC: Welton, Patricia [Welton.Patricia@epa.gov]; Gilrein, Stephen [gilrein.stephen@epa.gov]
Subject: FW: MEETING: Discussion of Bodine Memo: COVID-19 Implications for EPAs Enforcement and Compliance Assurance program

Lourdes and Ramiro,

Following up on today's call, here is the link to the press release we discussed: https://www.epa.gov/newsreleases/epa-corrects-record-after-reckless-reporting-temporary-compliance-guidance

Please let me know if you have any additional questions.

Take care,

Cheryl

Cheryl Seager | Director | Enforcement and Compliance Assurance Division | EPA Region 6| Mail Code 6ECAD| 1201 Elm Street| Suite 500 | Dallas, TX 75270 | Phone 214-665-3114 |

Message

From: Seager, Cheryl [Seager.Cheryl@epa.gov]
Sent: 3/26/2020 10:08:08 PM
To: James Kenney [James.Kenney@state.nm.us]; Scott Thompson [Scott.Thompson@deq.ok.gov]; Lourdes Iturralde [Lourdes.Iturralde@la.gov]; keogh@adeq.state.ar.us; Ramiro.Garcia@tceq.texas.gov
CC: Gilrein, Stephen [gilrein.stephen@epa.gov]
Subject: Fwd: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program

Hi everyone - just a follow up to our call today - HQ has asked us to direct everyone to the website rather than the attachment I sent earlier. It was good to talk to so many of you and your staff today. Please don't hesitate to reach out if we can be of any assistance.

All the best,
Cheryl
Sent from my iPhone

Begin forwarded message:

From: "Bodine, Susan" <bodine.susan@epa.gov>
Date: March 26, 2020 at 3:18:41 PM CDT
To: OECA All <OECA_All@epa.gov>, Regional Counsels and Deputies <Regional_Counsels_and_Deputies@epa.gov>, ECAD Directors and Deputies-Designees <ECAD_Directors_and_Deputies-Designees@epa.gov>, Enforcement Coordinators <Enforcement_Coordinators@epa.gov>, Leadership_Assistant_Administrators <Leadership_Assistant_Administrators@epa.gov>, Leadership_Deputy_Assistant_Administrators <Leadership_Deputy_Assistant_Administrators@epa.gov>, Leadership_Regional_Administrators <Leadership_Regional_Administrators@epa.gov>, Leadership_Deputy_Regional_Administrators <Leadership_Deputy_Regional_Administrators@epa.gov>, Regional Enforcement Staff <Regional_Enforcement_Staff@epa.gov>, Regional Enforcement Manager Contacts <Regional_Enforcement_Manager_Contacts@epa.gov>, "Gunasekara, Mandy" <gunasekara.Mandy@epa.gov>
Subject: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program

Colleagues:

As you know, ongoing efforts to limit the spread of COVID-19 have created unprecedented challenges for the regulated community. We remain mindful of the health and safety of the public, as well as our staff, and those of other Federal Agencies, State and Local Governments, Tribes, Regulated Entities, Contractors, and Non-governmental Organizations. We are taking these important considerations into account as we all continue our work to protect human health and the environment. Accordingly, we have developed a temporary policy regarding EPA enforcement of environmental legal obligations during the COVID-19 pandemic.

EPA will assess the continued need for and scope of this temporary policy on a regular basis and will update it if EPA determines modifications are necessary.

Susan

Susan Parker Bodine
Assistant Administrator

Office of Enforcement and Compliance Assurance
202-564-2440

Message

From: Gilrein, Stephen [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C08BD925669B48AC824210CE869FD17A-GILREIN, STEPHEN]
Sent: 3/27/2020 3:54:59 PM
To: scott.gilrein@tceq.texas.gov
Subject: something you may or may not find interesting...
Attachments: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program (March 26, 2020).pdf

Stephen A. Gilrein, P.E.
Deputy Director
Enforcement and Compliance Assurance Division
USEPA, Region 6
1445 Ross Ave., Dallas, TX 75202
214-665-8179

Message

From: Erin E. Chancellor [Erin.Chancellor@tceq.texas.gov]
Sent: 4/20/2020 9:39:43 PM
To: Gray, David [gray.david@epa.gov]; McQueen, Ken [McQueen.Ken@epa.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]
Subject: FW: Air Alliance Panel Discussion: Environmental Monitoring and Enforcement During COVID-19: Harris County Response

Thought I'd share if y'all haven't seen.

Thanks,

Erin E. Chancellor
Deputy Director | Office of Legal Services
Texas Commission on Environmental Quality
512.239.3426 (o) | 512.660.4862 (c)
erin.chancellor@tceq.texas.gov

From: Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Sent: Monday, April 20, 2020 4:03 PM
To: Toby Baker <Toby.Baker@tceq.texas.gov>; Steven Schar <Steven.Schar@Tceq.Texas.Gov>; L'Oreal Stepney <loreal.stepney@tceq.texas.gov>; Erin E. Chancellor <Erin.Chancellor@tceq.texas.gov>; Tonya Baer <Tonya.Baer@tceq.texas.gov>; Brent Wade <brent.wade@tceq.texas.gov>
Cc: Charmaine Backens <charmaine.backens@tceq.texas.gov>; Tracy Miller <tracy.miller@tceq.texas.gov>; Susan Johnson <susan.johnson@tceq.texas.gov>; Jayme Sadlier <jayme.sadlier@tceq.texas.gov>; Jonathan Walling <jonathan.walling@tceq.texas.gov>; Bryan Sinclair <bryan.sinclair@tceq.texas.gov>; Richard Chism <Richard.Chism@tceq.texas.gov>; Kelly Cook <kelly.cook@tceq.texas.gov>
Subject: FW: Air Alliance Panel Discussion: Environmental Monitoring and Enforcement During COVID-19: Harris County Response

Good afternoon,

FYSA

-Ramiro

From: Jonathan Walling <jonathan.walling@tceq.texas.gov>
Sent: Monday, April 20, 2020 2:56 PM
To: Ramiro Garcia <ramiro.garcia@tceq.texas.gov>; Tracy Miller <tracy.miller@tceq.texas.gov>; Susan Johnson <susan.johnson@tceq.texas.gov>; Jayme Sadlier <jayme.sadlier@tceq.texas.gov>
Cc: Cynthia Gandee <Cynthia.Gandee@tceq.texas.gov>
Subject: Air Alliance Panel Discussion: Environmental Monitoring and Enforcement During COVID-19: Harris County Response

Today, the R12 Office became aware of this upcoming virtual meeting sponsored by Air Alliance Houston. The topic of discussion is the predictive impacts of EPA and TCEQ enforcement discretion.

Virtual Panel Discussion

Environmental Monitoring and Enforcement During COVID-19: Harris County Response

Wednesday, April 29, 10:00 - 11:30 AM

Both the US Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) have stated their intent to exercise enforcement discretion for environmental monitoring and reporting requirements amid the coronavirus pandemic.

Because of our region's lax land-use policies, many communities live near polluting facilities. Lack of monitoring of what chemicals are being emitted or delays in equipment repairs threaten the health and safety of Houstonians, especially given that new research suggests that exposure to air pollution is associated with worse COVID-19 health outcomes. These decisions will disproportionately impact communities of color and low-income neighborhoods, where polluting facilities are concentrated and the residents are already suffering inequitably from the impacts of the coronavirus crisis.

Please join us on Wednesday, April 29th, at 10 AM for a discussion with guest speakers from Harris County to hear how the EPA's and TCEQ's decisions to curtail enforcement will impact the county's pollution control activities and how they're responding to new developments.

Guest presenters:

- **Dr. Latrice Babin**, Director, Harris County Pollution Control Services Department
- **Rock Owens**, Special Assistant County Attorney, Harris County Attorney's Office
- **Alexander Forrest**, Assistant District Attorney, Harris County District Attorney's Office

There will be an opportunity to ask questions during the discussion. We encourage you to send them in advance of the meeting to info@airalliancehouston.org.

There is no cost to attend, but registration is required.

REGISTER NOW

For questions or registration assistance, please contact us at 713-528-3779 or info@airalliancehouston.org.

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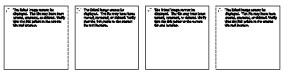

Air Alliance Houston | 2520 Caroline St, Suite 100, Houston, TX 77004

Unsubscribe ybarra.jason@gmail.com

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Message

From: Erin E. Chancellor [Erin.Chancellor@tceq.texas.gov]
Sent: 5/31/2020 3:58:18 PM
To: Gray, David [gray.david@epa.gov]
Attachments: Plan.pdf

Erin E. Chancellor
Deputy Director | Office of Legal Services
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512.239.3426 (o) | 512.660.4862 (c)
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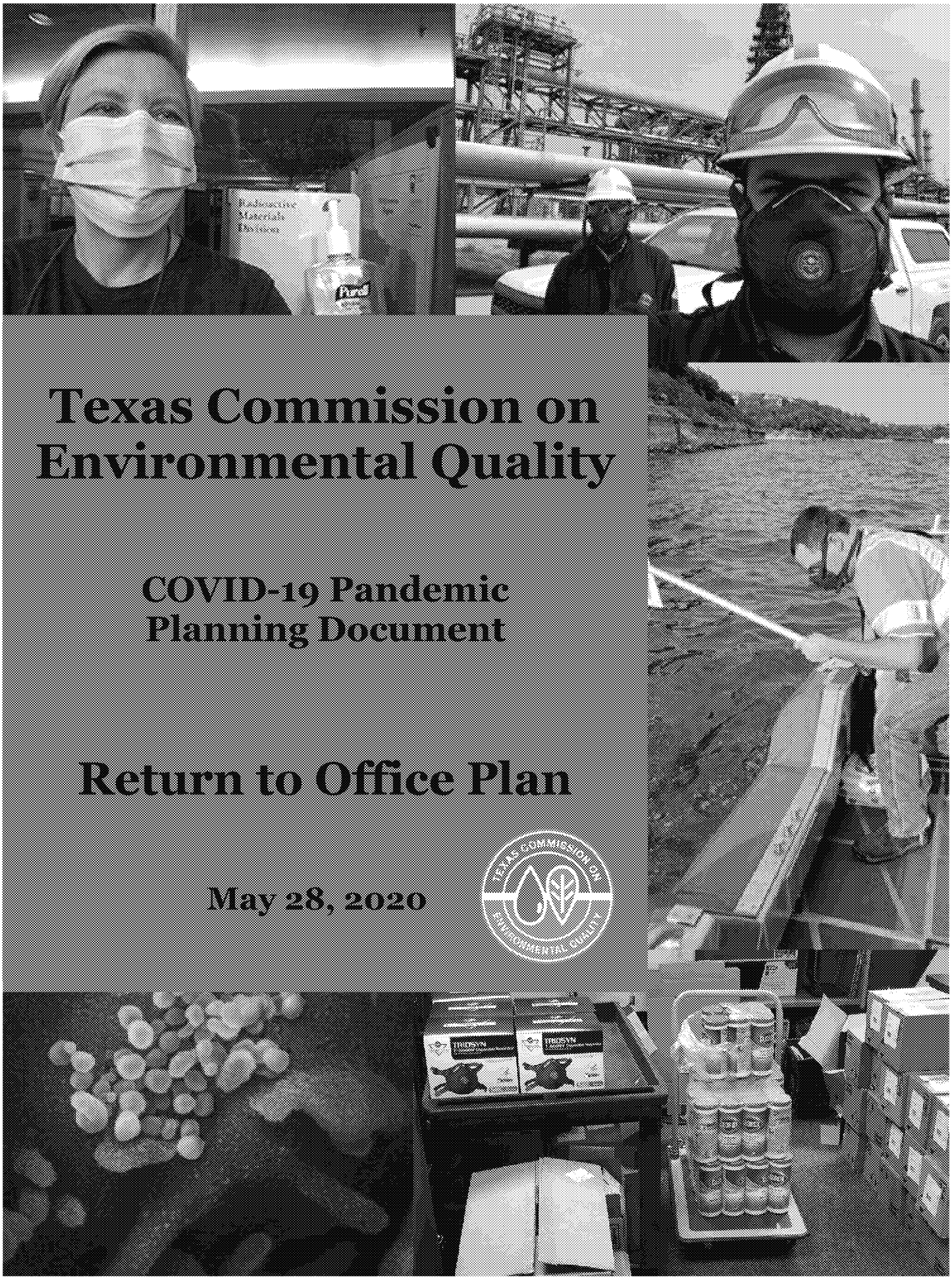

Texas Commission on Environmental Quality

COVID-19 Pandemic Planning Document

Return to Office Plan

May 28, 2020

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Texas Commission on Environmental Quality
COVID-19 Pandemic Planning Document
Return to Office Plan

1.0 Introduction

This planning document is based on the advice of state and federal public health officials, adapting their guidance to the Texas Commission on Environmental Quality's (TCEQ) operations. This guidance includes the Centers for Disease Control and Prevention's (CDC) "Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19)" and the Texas Department of State Health Services (DSHS) guidance "COVID-19: Recommendations and Best Practices for Texas Businesses That Remain Open in Compliance with the Executive Order of the Governor/COVID-19: Guidance for Employees and Managers."

This pandemic planning document is meant to provide an outline of potential activities that would be helpful in safely implementing a return to office work plan for each division and regional office. The goal is to have this document available for agency leadership, so that they may consider what actions and priorities are appropriate as we move towards returning TCEQ staff to the office work environment.

2.0 Planning Document Highlights

On Monday, April 27, 2020 the Governor released the Report to Open Texas and announced the first phase of the state's ongoing plan to safely and strategically open Texas while minimizing the spread of COVID-19. On Monday, May 18, 2020, he announced the second phase. We will also follow a similar phased approach to returning to work in our offices. Our Pandemic Response Team has developed this plan guided by two important principles: (1) staff safety and (2) fulfilling our mission to serve the people of Texas.

Using a phased approach, we will initially begin returning staff to the office space, as needed, starting June 1, 2020. Additional guidance pertaining to the phased approach will be issued when applicable.

The following planning elements are considered essential for returning TCEQ employees (aka: "employees and agency contractors") to a safe office workspace:

- Using a phased approach, initially allow for up to 25% of staff to return to the office workspace.
  - Employees who can efficiently telework should continue to do so.
  - Returning employees should be focused on carrying out TCEQ essential functions and services, filling our regulatory gaps, and include employees that have been unable to telework efficiently.
  - Employees who are at higher risk because of age, pre-existing conditions and/or compromised immune systems, or are caring for a member of their household in these high-risk categories, are encouraged to continue to telework.
- TCEQ offices will remain closed to the public temporarily.
  - TCEQ will continue to assist the public through established virtual methods, email and telephone.
- Employees who are sick or have a possible exposure scenario to COVID-19 must stay home.
- Returning employees will be required to complete COVID-19 safety training through the TCEQ Learning Center.
- Returning employees will be required to certify that they have read and understand TCEQ's return to office plan.
- Returning employees will be required to complete an initial Pre-Return to the Office Questionnaire.
- Returning employees will have to acknowledge daily that they have conducted a self-screening for symptoms of COVID-19.

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- Employees in the office must wash or sanitize their hands upon entering any office building.
- Employees in the office must wear a face covering (over the nose and mouth).
- Employees in the office will be required to cover their nose and mouth when coughing or sneezing according to CDC guidelines.
- Employees in the office will be required to wash or sanitize their hands often throughout the workday according to CDC guidelines.
- Employees in the office will be required to practice social distancing.
- Frequently touched objects and surfaces in the workplace must be cleaned and disinfected often.
- Employee Safety Checklists including:
  - Safety Checklist for Office-based Employees;
  - Safety Checklist for Employees Conducting Field Work; and,
  - Vehicle Cleaning Checklist.

3.0 Planning Assumptions

- The COVID-19 virus may still be spreading in local communities.
- Local conditions regarding community spread of the virus and local restrictions/orders may influence staffing decisions for each TCEQ office location.
- We will need to continue to observe COVID-19 public health recommendations/guidance and orders as issued by the Governor, DSHS, CDC, and local city/county public health officials.
- The COVID-19 Pandemic may be with us for an extended period of time, and it is possible that additional waves of the pandemic may occur.
- Any plan for returning to the office will likely be implemented using a phased approach.
- Teleworking is likely to continue for some groups for several months.

4.0 Planning Elements

Three key aspects of this guidance include: (1) Preventing and Reducing Transmission Among Employees; (2) Maintaining Healthy Office Workspace Operations and Field Activities; and (3) Maintaining a Healthy Office Work Environment.

- The TCEQ Pandemic Response Team will be engaged to refine planning element details and procedures as necessary.

4.1 PREVENTING AND REDUCING TRANSMISSION AMONG EMPLOYEES

4.1.1 Limit employees and the public from entering the office workspace

As we look to ease restrictions on accessing the offices and gradually returning to the office, it's important that we do so with an eye toward services, productivity, and safety. Using a phased approach, we will initially begin returning staff to the office as needed, with each division limited to 25% office staffing capacity.

- Those employees who can continue to telework efficiently should continue to do so.
- The 25% staffing capacity is a limit or cap, not a required goal.
- The agency will reasonably accommodate those with individual and family health concerns and those who have childcare issues related to the COVID-19 Pandemic.
- The priority for determining which staff should return to the office should be focused on those that are necessary to carry out the TCEQ essential functions and services, including staff who can help fill our regulatory gaps where our services were discontinued or productivity was materially diminished (see Section 4.2.9).
- Division management will be responsible for determining necessary staffing requirements and patterns within each division. HRSS and The General Law Division

(GLD) will assist by providing management with a checklist of questions to help make these determinations[1].

- Division management should consider implementing staggered work shifts or rotating schedules by days of the week (split schedule), by alternating weeks, by splitting am/pm schedules, or using a compressed workweek to accomplish staffing needs.
  - For consideration, see link to innovative study by Israeli research scientists that shows potential benefits of working 4 consecutive (ten hour) days in the office (week 1) and then 10 consecutive days out of the office (week 2 – which could include 4 or 5 days teleworking from home), then repeat. Seems to have some merit. https://www.cbc.ca/radio/thecurrent/the-current-for-may-14-2020-1.5569302/4-days-at-work-10-days-in-lockdown-would-restart-economy-amid-fears-of-covid-19-resurgence-says-economist-1.5570190.

Using a phased approach, TCEQ offices will remain closed to the public temporarily. TCEQ will continue to assist the public through virtual methods, email and telephone.

4.1.2 Require employees to stay home if sick, caring for someone sick or otherwise exposed
To prevent or reduce transmission among employees, it is important for managers and supervisors to require employees to stay home if: (1) they exhibit one or more characteristic symptom of COVID-19[2], (2) they have tested positive for COVID-19 (with or without symptoms), (3) they are caring for someone with COVID-19, or (4) they otherwise suspect that they have been exposed to COVID-19.

Employees who meet any one of these four criteria should immediately contact their healthcare provider and not report to work. In notifying their supervisors about one of these exposures, employees are to provide:

- The date the employee was last in any TCEQ office;
- The date the employee (or family member) began exhibiting symptoms; and
- The date the employee or family member tested for COVID-19 and/or received notice of a positive COVID-19 test.

These employees should follow DSHS and CDC guidance and recommendations[3], and advice from their healthcare provider. Employees with these exposures should continue to keep their supervisor updated on the progress of their recovery, if possible, and are not to report to any TCEQ office (return to the office) without supervisor approval[4]. Employees who have tested positive for COVID-19, or believe they had COVID-19 and stayed home with illness, must follow DSHS guidance[5] or provide a healthcare provider release before returning to work. Employees who are caring for someone with COVID-19 or had a close contact with a COVID-19 positive person will be required to follow DSHS guidance[6] and complete a 14-day self-quarantine period from the last date of exposure, before returning to work.

Employees with a diagnosis of an illness other than COVID-19, may return to the office based on healthcare provider criteria for their illness.

---

[1] The management checklist/questions to help with staffing determinations will be placed on the Share*Net* COVID-19 Managers Page.
[2] CDC/National Center for Immunization and Respiratory Diseases (NCIRD), Division of Viral Diseases - Symptoms of Coronavirus, https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html.
[3] DSHS - What to Do If You Are Sick, May 8,2020, https://dshs.texas.gov/coronavirus/#ifsick. CDC/NCIRD - If You Are Sick or Caring for Someone, https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/index.html.
[4] Supervisor approval for employee return to the office must be coordinated with the TCEQ HRSS Director.
[5] DSHS - Letter to Texas Employers, V.2.0, May 7, 2020.
[6] DSHS - Minimum Standard Health Protocols for COVID-19, Checklist For All Employers, Page 4, May 5, 2020, https://dshs.texas.gov/coronavirus/docs/opentx/MinimumStandardHealthProtocols.pdf.

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Supervisors should continue to report employee notifications about COVID-19 illness or exposure to Human Resources and Staff Services (HRSS) for tracking, and to ensure confidentiality and consistency of information, and to initiate special leave.

Supervisors will be provided clear guidance on addressing an employee who reports to work with possible symptoms following the most current CDC guidance on COVID-19. HRSS will publish guidance on the COVID-19 Share*Net* page and provide additional support and instructions for specific circumstances (including notifications to employees who may have shared a common workspace with the sick employee).

4.1.3 Consider how employees might be exposed to the virus and educate them about how they can reduce the spread

- The virus is thought to spread mainly from person-to-person[7].
  - Between people who are in close contact with one another (within about 6 feet).
  - Through respiratory droplets produced when an infected person coughs, sneezes or talks.
  - These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs.
  - Some recent studies have suggested that COVID-19 may be spread by people who are not showing symptoms.
- It may be possible that a person can get COVID-19 by touching a surface or object that has the virus on it and then touching their own mouth, nose, or possibly their eyes, but this is not thought to be the main way the virus spreads[6].
  - In general, because of poor survivability of these coronaviruses on surfaces, there is likely very low risk of spread from food products or packaging.
- Employees will be required to complete training based on CDC and DSHS COVID-19 guidance, including but not limited to[8]:
  - Proper handwashing and use of hand sanitizer.
  - Avoid touching eyes, nose, mouth, and other areas of the face with unwashed hands.
  - Covering their mouth and nose with a tissue when they cough or sneeze or use the inside of their elbow. Throw used tissues in the trash and immediately wash hands with soap and water for at least 20 seconds. If soap and water are not available, use hand sanitizer containing at least 60% alcohol.
  - Proper use and care of face coverings and masks.
  - Avoiding the use of other employees' phones, desks, offices, pens, or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after use.
  - Proper cleaning of the employee's work area using approved methods.
  - Practice social distancing by maintaining distance (approximately 6 feet or 2 meters) from others when possible.
  - Meet virtually via Teams or phone calls in lieu of physical meetings when possible.

4.2 MAINTAINING HEALTHY OFFICE WORKSPACE OPERATIONS AND FIELD ACTIVITIES

4.2.1 Pre-screening employees before returning to the office workspace

- All employees will be required to complete the COVID-19 Safety Training and the Return to the Office Questionnaire before returning to any TCEQ office.
  - The required COVID-19 Safety Training objectives are to educate staff on the basics of COVID-19, including how it spreads and symptoms; prevention through good hygiene and respiratory etiquette; social distancing; required face coverings and cleaning and disinfection.

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[7] CDC/National Center for Immunization and Respiratory Diseases (NCIRD), Division of Viral Diseases - Symptoms of Coronavirus, How COVID-19 Spreads, https://www.cdc.gov/coronavirus/2019-ncov/faq.html#How-COVID-19-Spreads.

[8] Required employee training will be provided through the TCEQ Leaning Center.

- In concluding the training all employees will be asked to complete the attached questionnaire prior to resuming a work schedule in any TCEQ office (see 5.0 Attachments, Attachment 1).
- This includes those critical employees who have been coming into the office during the agency-wide telework period.
- Employees remaining on a primarily telework schedule will be asked to complete the questionnaire before coming to work intermittently in any TCEQ office.
- Employees who answer yes to any questions related to symptoms or risk factors will be directed to stay home and notify their supervisors.
- Supervisors will use the guidance in Section 4.1.2.

4.2.2 Daily screening of employees who enter the office workspace

- Employees will be required to conduct a daily self-screening for symptoms of COVID-19 before entering any TCEQ office[9].
  - An email will be sent out to all employees each workday morning at 6:00 AM reminding everyone to conduct a self-screening for symptoms of COVID-19 before entering any TCEQ office or traveling on official state business.
  - Employees who will be entering any TCEQ office or traveling on official state business will be required to send an email to their immediate supervisor each workday morning acknowledging that they have conducted a self-screening for symptoms of COVID-19. This email can be sent remotely or immediately upon entering the workplace and logging on to the TCEQ network.
- Any employee who has any of the following new or worsening signs or symptoms of possible COVID-19 must stay home:
  - Cough
  - Shortness of breath or difficulty breathing
  - Chills
  - Repeated shaking with chills
  - Muscle pain
  - Headache
  - Sore throat
  - Loss of taste or smell
  - Diarrhea
  - Feeling feverish or a measured temperature greater than or equal to 100.0 degrees Fahrenheit
  - Known close contact with a person who tested positive for COVID-19
- Employees who may be sick must not report to work (see Section 4.1.2).
- Employees will be required to ensure that they scan their TCEQ ID each time they enter and exit a building. Regional and remote office locations will implement equivalent procedures.
  - This is important because it helps us determine who was in the office and when and allows us to provide notifications to staff who may have been exposed to COVID-19. For example, if a sick employee inadvertently enters the workspace or someone becomes sick while at work and then tests positive for the virus.

4.2.3 Require hand washing for all employees upon entering the office workspace

- All employees will be required to wash or sanitize their hands upon entering the office[10].

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[9] DSHS - Minimum Standard Health Protocols for COVID-19, Checklist For Office-Based Employers, Page 37, May 5, 2020, https://dshs.texas.gov/coronavirus/docs/opentx/MinimumStandardHealthProtocols.pdf.

[10] DSHS - Minimum Standard Health Protocols for COVID-19, Checklist For Office-Based Employers, Page 38, May 5, 2020, https://dshs.texas.gov/coronavirus/docs/opentx/MinimumStandardHealthProtocols.pdf.

- Employees must wash hands with soap and water for at least 20 seconds or use a hand sanitizer that contains at least 60% alcohol, if soap and water are not readily available[11].

4.2.4 Require respiratory etiquette, face coverings for employees

DSHS and CDC recommends wearing cloth face coverings in public settings where other social distancing measures are difficult to maintain. CDC also advises the use of simple cloth face coverings to slow the spread of the virus and help people who may have the virus and do not know it from transmitting it to others[12].

- All employees will be required to wear a face covering (over the nose and mouth) while entering in and exiting the building, while occupying shared spaces or common spaces, when leaving their personal workspace, or anytime social distancing is not possible[10].
- All employees will be required to ensure that their nose and mouth are covered when coughing, or sneezing. If a tissue is used to cover a cough or sneeze, throw the tissue away immediately and follow the provisions under Section 4.2.5 (below) for good hand hygiene practices.

  For the office workspace:
  - Non-medical grade or cloth face coverings should be used.
  - N95, P95 and KN95 face masks are in short supply and should be reserved for healthcare workers or other first responders.
  - Employees should provide their own personal non-medical grade or cloth face coverings (TCEQ may supply a Non-medical grade or cloth face coverings, if supplies are available).
  - Employees should follow CDC recommendations on how to safely wear and take off a cloth face covering[13].
  - Employees should follow CDC recommendations for proper handing, cleaning and storage of face coverings[14].

  For business related field work:
  - N95, P95, or KN95 face masks should be used for business related field work only.
  - Employees will be provided with a N95, P95, or KN95 face mask for field work.
  - Employees should follow CDC recommendations on how to safely put on and wear a N95 face mask (also P95 or KN95)[15].
  - Since N95, P95 and KN95 face masks are in short supply during the COVID-19 Pandemic, employees should follow CDC recommendations for reusing face masks[16].
- Anyone who has trouble breathing should not be wearing a face covering or face mask.
  - Employees in this situation should contact their supervisor to discuss alternate options for workplace safety[17].

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[11] CDC/National Center for Immunization and Respiratory Diseases (NCIRD), Division of Viral Diseases – How to Wash your Hands, https://www.cdc.gov/handwashing/when-how-handwashing.html.

[12] CDC/National Center for Immunization and Respiratory Diseases (NCIRD), Use of Cloth Face Coverings to Help Slow the Spread of COVID-19, https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html.

[13] CDC/National Center for Immunization and Respiratory Diseases (NCIRD), How to Safely Wear and Take Off a Cloth Face Covering, https://www.cdc.gov/coronavirus/2019-ncov/downloads/cloth-face-covering.pdf.

[14] CDC/National Center for Immunization and Respiratory Diseases (NCIRD), Important Information About Your Cloth Face Coverings, https://www.cdc.gov/coronavirus/2019-ncov/downloads/cloth-face-coverings-information.pdf.

[15] CDC/National Center for Immunization and Respiratory Diseases (NCIRD), Using Personal Protective Equipment (PPE), https://www.cdc.gov/coronavirus/2019-ncov/hcp/using-ppe.html.

[16] CDC/National Center for Immunization and Respiratory Diseases (NCIRD), Pandemic Planning, Respirator Reuse Recommendations, https://www.cdc.gov/niosh/topics/hcwcontrols/recommendedguidanceextuse.html.

[17] Supervisors should contact HRSS on a case-by-case basis to discuss how to properly handle this type of employee situation.

4.2.5 Require employees to use good hand hygiene practices and other safety measures
Employees should help protect themselves from respiratory illness using everyday preventive actions, including good hand hygiene.

- Employees will be required to wash or sanitize their hands often throughout the workday.
- Readily visible signage reminding employees to use good hand hygiene practices should be placed throughout the workspace (i.e. at all building entry points, in restrooms, near elevators and in common spaces).
- Hand Sanitizer for employee use should be placed throughout the workspace (i.e. at all building entry points, near elevators and in common spaces).
- Additional hand sanitizer should be distributed to office/division areas for employee use.
- Employees should follow CDC recommendations to wash or disinfect their hands often with soap and water for at least 20 seconds, or use a hand sanitizer that contains at least 60% alcohol if soap and water are not readily available, especially during key times when persons are likely to be infected by or spread germs, including[18]:
  - After blowing one's nose, coughing, or sneezing.
  - Before, during, and after preparing food.
  - After using the restroom.
  - After touching garbage.
  - After touching objects or surfaces that have been handled by others.
- Employees should avoid touching eyes, nose, and mouth with unwashed hands.
- To the extent possible, avoid touching high-touch surfaces in public places – elevator buttons, door handles, handrails, handshaking with people, etc.
- Employees should wash hands or use hand sanitizer before and after using commonly touched equipment such as copiers, printers, and fax machines.
  - Use best practices by disinfecting touchpad devices before and after use.
- Employees should use appropriate PPE (e.g. disposable gloves, if recommended by product instructions) when using cleaning and disinfectant supplies[19].

All employees will be required to follow other best practices including:

- Not sharing food with other staff.
- Washing or disinfecting your hands immediately after using stairs.
- Discontinuing in-person meetings of 5 or more staff.
- For Conference Rooms[20]:
  - Limiting staff occupancy to allow for 6 feet between employees and adhering to a 25% occupancy limit;
  - Following best practice and use virtual meetings or telephone conferences.
- For Breakrooms, Restrooms[20]:
  - Limiting to 25% - 50% of occupancy (e.g., 1-2 in 4 stall bathroom);
  - Discontinuing use of common coffee pots and other small appliances;
  - Not using breakrooms for more than 15 minutes.
- For Copier Rooms, File Rooms, Work Rooms and Supply Rooms[20]:
  - limiting number of occupants to maintain social distancing of 6 feet.

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[18] CDC/National Center for Immunization and Respiratory Diseases (NCIRD), How to Protect Yourself & Others, Wash your hands often, https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html.
[19] CDC/National Center for Immunization and Respiratory Diseases (NCIRD), Reopening Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes, https://www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html.
[20] Signs with additional instructions/occupancy limits will be placed or provided for placement at entry by HRSS and CID.

4.2.6 Require employees to practice social distancing

Social distancing means maintaining distance (approximately 6 feet or 2 meters) from other individuals, not gathering in groups and staying out of crowded spaces. If such distancing is not feasible, other measures such as face covering, hand hygiene, cough etiquette, cleanliness, and sanitation should be rigorously practiced[21].

- Employees will be required to practice social distancing while in the office workspace or while conducting other business-related activities[21].

Strategies to accomplish social distancing could include:

- Teleworking to maintain a low number of staff in our offices.
- Implementing staggered work shifts or rotating schedules by days of the week (split schedule), by alternating weeks, or by splitting am/pm schedules to accomplish staffing needs (as discussed in Section 4.1.2).
- Maintaining at least 6 feet of separation from other individuals while entering buildings.
- Eliminate gatherings, such as in-person staff meetings.
- Holding meetings/events virtually using teleconference or Microsoft Teams (or other applications) as much as possible.
- Discourage people from entering each other's office/cubes to maintain social distancing.
- Eliminating social gatherings (e.g., birthday celebrations, baby showers).
- Limiting the need for staff movement between assigned work areas and buildings.
- Limiting the occupancy in elevators to no more than 4 people, each located at a different corner of the elevator to avoid close contact.
    - In elevators, masks should be worn.
    - For individuals not wishing to ride an elevator, ensure stairways are available for use.
    - As appropriate, individuals subject to the Americans with Disabilities Act may request to ride the elevator alone[21].
- Using stairs as an alternative to using elevators, when possible.

4.2.7 Travel for official business

- Employees will be required to complete a daily self-screening for symptoms of COVID-19 before traveling on official state business.
- No out-of-state travel until further notice.
- Follow the State and Local restrictions on in-state travel.
- Travel for field work should be considered essential agency business.
    - Advise employees to inquire with facility/regulated entity staff about COVID-19 risks/mitigation strategies before conducting on-site investigations. Additional PPE may be required by the facility.
    - Staff who travel to work or for other official state business should carry their agency-issued ID with them, along with a copy of the TCEQ Employee Travel Letter[22] (see Section 5.0, Attachment 5).
    - Vehicle protocols should be established to determine the number of employees that can safely travel together[23].
    - Staff who travel using an agency vehicle should follow the Vehicle Cleaning Checklist before and after an agency vehicle is driven (see Section 5.0, Attachment 4).

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[21] DSHS - Protocols for All Office-Based Employees, May 18, 2020, https://dshs.texas.gov/coronavirus/docs/opentx/ProtocolsforAllOfficeBasedEmployees.pdf.

[22] OLS will update the current TCEQ Travel Letter which expired on April 30, 2020.

[23] The TCEQ Pandemic Response Team will establish a workgroup to evaluate current safety recommendations for traveling and create protocols for the number employees that can safely travel together.

4.2.8 Employee circumstances will be reasonably accommodated

Pursuant to the Families First Coronavirus Response Act (FFCRA), the Americans with Disabilities Act policy and other applicable agency policies, the agency will provide reasonable accommodations for work schedule and location for those circumstances where:

- Employees at higher risk because of age (those 65 and older), pre-existing conditions and/or compromised immune systems, or are caring for a member of the employee's household in these high-risk categories;
- Employees with individual and family health concerns; or,
- Employees who have childcare issues related to the COVID-19 Pandemic.

4.2.9 Assessing our gaps in regulatory coverage and determining how we can provide these functions during pandemic

Each division has recently assessed its current operations and identified their gaps in regulatory coverage which have not been fully operational since the agency transitioned to a telework environment. This would include all essential functions identified as those activities required to be performed by statute, Executive Order, or otherwise deemed essential by executive management to meet agency mission requirements. Divisions were also asked to determine what other activities or services we have not been providing to the public. This may include activities such as providing training and workshops, or other services the agency provides that are not legislatively mandated.

After identifying these gaps in regulatory coverage and other activities, each division then identified solutions or resources/requirements that would be needed to safely re-start these identified activities. While some divisions identified easy solutions that could be accomplished in a telework environment, certain activities are dependent on staff working in the office workspace to be fully accomplished.

As the agency works to gradually return staff to the office, it's important that we do so with an eye toward services, productivity, and safety. To help accomplish this, it is important that we use our list of Gaps in Regulatory Coverage to prioritize staff who can help fill our regulatory gaps and discontinued services as those who are returned to the office first. Also, by allowing staff who can accomplish other regulatory activities efficiently through telework, to continue to do so, we provide better social distancing and promote a safer workspace.

Important considerations for returning staff include:

- Whether the staff presence in the office enables a service/productivity priority to be accomplished.
- Whether the activity being accomplished can be done so in a manner that accommodates social distancing.

For the future, it is important for us to begin cross-training employees who can perform these essential functions so we can continue to provide essential functions even if key employees are absent.

4.3 MAINTAINING A HEALTHY OFFICE WORK ENVIRONMENT

4.3.1 Communication with employees

A COVID-19 internal Share*Net* page "Coronavirus Disease 2019 (COVID-19) Staff Resources" has been created to serve as the central information point for employees to find information about COVID-19, view related agency guidance and plans, and provide relevant links to external resources. Managers and supervisors can also access important employee guidance documents in separate Share*Net* libraries linked to this page. The COVID-19 Share*Net* page can found under Featured Links on the main agency Share*Net* site or at https://tceq.sharepoint.com/sites/OAS/hrss/Pages/covid-19-staff-resources.aspx.

Other important communications with employees include:

- Communicating the main elements of the Return to Office Plan with employees via email.
  - The Return to Office Plan will be posted on the COVID-19 Share*Net* page for easy access by employees.
- Directing employee questions related to COVID-19 and the Return to Office Plan to HRSS and CID via email.
- Employee questions should be emailed to HR@tceq.texas.gov. Providing employees with safety checklists for Office-based Employees and Employees Conducting Field Work (see Section 5.0, Attachment 2 and Attachment 3).
  - The employee safety checklists will be posted on the COVID-19 Share*Net* page for easy access by employees.
- Placing readily visible signage placed throughout the workspace (i.e. at all building entry points, in restrooms, near elevators and in common spaces) reminding employees to use respiratory etiquette (wear cloth face coverings), practice good hand hygiene and follow social distancing guidelines.
- HRSS is coordinating with the landlords of TCEQ's offices throughout the state about our re-opening plans.
- Notifying staff when an employee with possible symptoms of COVID-19 has been in the office workspace.
  - HRSS will assist with notification of staff (see Section 4.1.2).

4.3.2 Engineering controls for the building ventilation systems

HRSS will confirm that HVAC systems/filters are being properly maintained in all TCEQ office locations.

4.3.3 Perform routine building environmental cleaning and disinfection

Confirm that building landlords have COVID-19 compliant cleaning protocols in place.

- HRSS will continue to coordinate with TFC, Colonnade Management, and Regional Offices to ensure cleaning measures continue, as appropriate.

Encourage employees to clean and disinfect their own workspace and commonly used surfaces often.

- Frequently touched objects and surfaces in offices/cubes should be disinfected frequently (e.g., workstations, keyboards, telephones, doorknobs). If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection.
- Commonly used surfaces (e.g., printer, copier, and fax machine buttons) should be disinfected by employees before each use.
- For disinfecting surfaces, use EPA-approved disinfectants for use against the virus that causes COVID-19[24,25].
  - Most common EPA-registered household disinfectants should be effective. A list of products that are EPA-approved for use against the virus that causes COVID-19 is available on EPA's website.
  - TCEQ will provide disposable disinfectant wipes for employee use, as supplies are available.
  - Employees should always follow the directions on the label. The label will include safety information and application instructions.
- Employees should use appropriate PPE (e.g. disposable gloves, if recommended by product instructions) when using cleaning supplies.
- Employees should wash or disinfect hands after cleaning workspace or other commonly used surfaces.

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[24] CDC/EPA, Guidance for cleaning and disinfecting, https://www.cdc.gov/coronavirus/2019-ncov/community/pdf/ReOpening_America_Cleaning_Disinfection_Decision_Tool.pdf.

[25] EPA, List N: Disinfectants for Use Against SARS-CoV-2, https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2.

Discourage staff from using other employees' phones, desks, pens, offices, or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after use.

4.3.4 Perform enhanced cleaning and disinfection after persons suspected/confirmed to have COVID-19 have been in a building

- If a sick employee is suspected or confirmed to have COVID-19, the agency will address the work area including but not limited to:
  - The affected work areas are to be closed pending cleaning and disinfection.
  - HRSS will coordinate cleaning requirements, timing and the costs.
  - HRSS will assist with notification of staff (see Section 4.1.2).

4.3.5 Agency cafeterias and gyms

- At this time, agency cafeterias may open for take-out only.
- At this time, agency gyms will remain closed.

5.0 Attachments

Attachment 1 - TCEQ Return to the Office Questionnaire
Attachment 2 - Safety Checklist for Office-based Employees
Attachment 3 - Safety Checklist for Employees Conducting Field Work
Attachment 4 - Vehicle Cleaning Checklist
Attachment 5 - TCEQ Travel Letter

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Attachment 1

TCEQ Return to Office Questionnaire

This TCEQ Return to Office Questionnaire will be incorporated into the required COVID-19 Safety Training and completed by employees through the Learning Center.

Symptoms Screening

Within the last 14 days, have you had any of the following symptoms?

- Fever (>100F)
- Cough
- Shortness of breath or difficulty breathing
- Chills
- Muscle pain
- Sore throat
- New loss of taste or smell
- Gastrointestinal symptoms such as nausea, vomiting, or diarrhea
- None of the above

Travel

Have you traveled outside of Texas within the last 14 days?

- Yes
- No

Possible Exposure

Are you currently caring for a family member who has COVID-19 symptoms or has tested positive for COVID-19?

- Yes
- No

Within the last 14 days, have you had direct (less than 6 feet for more than 10 minutes) exposure to someone who has tested positive or is currently undergoing testing for COVID-19 due to symptoms?

- Yes
- No

Testing

Have you been tested for COVID-19?

- Yes If yes, date tested? Or date you expect to receive results?
- No

Attachment 2

Safety Checklist for Office-based Employees

Daily Self-check for Symptoms at home:
Before reporting to work, check yourself for any symptoms using the CDC symptom guidance https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html

- Do this every day you are to report to work.
- Stay home if you are sick or caring for someone who is sick.
  - Notify your supervisor as soon as possible if you are beginning to feel sick or you become aware that someone you have close contact with someone who is being tested for COVID-19 or who has tested positive for COVID-19.
  - Complete the Questionnaire to notify HRSS and get additional guidance.

Maintain social distance of 6 feet when interacting with others:
CDC guidance on Social Distancing https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html

- Continue using virtual meetings, telephone and email to minimize in-person communication.

Practice Preventive Hygiene:
CDC guidance https://www.cdc.gov/handwashing/when-how-handwashing.html

- Wash your hands when you arrive at work and frequently.
- Use hand sanitizer when soap and water handwashing is not possible
- Cover your cough or sneeze with a tissue, throw it in the trash, and then wash your hands
- Avoid touching your eyes, nose, and mouth with unwashed hands
- Do not use other employees' telephones, offices or cubical desks, office supplies

Use Face Covering while in the Office:
Provide your own that covers your nose and mouth. Keep it clean. CDC guidance on Cloth Face Coverings https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html
Use when:

- In-person interactions with others in the office.
- moving around the common areas, including file/copier/work rooms, hallways, stairways, elevators, breakrooms, and restrooms.
- You can remove the face covering in your cube or office while working alone.
- Contact your supervisor if you need assistance with a face covering for work.

Keep TCEQ Clean:

- Daily clean your chair, desk, phone, keyboard, mouse and other surfaces you commonly touch in your cube or office.
- Use hand sanitizer before and after using commonly used equipment such as copiers, printers, fax machines.
  - Use best practices by disinfecting touchpad devices before and after use.

Attachment 3

COVID-19 Safety Checklist for Employees Conducting Field Work

When TCEQ returns to the office for daily work (will start with phased approach) field work can resume, as long as COVID-19 Workplace Health and Safety Protocols are followed. Prior to conducting field work, the following should be considered:

- Can this activity be accomplished in-house? If an alternative workplan event which permits an in-house activity to substitute for an on-site activity, consider the use of this alternative.
- Can this activity be conducted with minimal or no contact? Consider if this is an investigation that can be conducted with the use of videos and/or photos taken and submitted by the Regulated Entity (RE).

If an onsite investigation will be conducted, see below.

Pre-investigation – In-House:

- You can pre-notify for complaint and unsatisfactory facilities during the COVID-19 if an on-site investigation is necessary to determine compliance. However, limit notification to no more than 48 hours.
- Contact the RE to discuss the following considerations.
  - RE's procedures on outside visitors; these must be followed unless modifications are mutually agreed upon with the RE.
  - Meeting accommodations – Determine if this activity can be accomplished outdoors exclusively or in other environment where social distancing is possible. Warehouse, garage environments which allow more ventilation are preferable to office-like environments.
  - Required personal protective equipment (PPE) for RE and agency staff (i.e. masks).
  - Request records be provided electronically.
  - Discuss the plan for the site walkthrough and what the investigator will need to see. If driving is required at the site, the TCEQ vehicle should follow the RE.
- Check out all necessary sampling equipment and store or label so it will not be used or touched by other staff within 48 hours prior to departure. Wipe down all equipment storage cases. Avoid use of disinfectant wipes directly on sensitive equipment. Refer to equipment specifications for cleaning guidance.
- Ensure you are following the *Arrival and Departure Procedures* found in the *COVID-19 Workplace Health and Safety Protocols* document when you leave for and return from field work.
- While preparing for the investigation, plans and/or map the on-site portion of the investigation in order to limit on-site activities as much as possible.

Pre-investigation – Before Departure:

- Clean vehicle before first use of the day (see Section 5.0, Attachment 4 - Vehicle Cleaning Checklist).
- Secure proper PPE (mask, several pairs of disposable gloves, hand sanitizer, disinfectant wipes).
- Wipe down all shared equipment storage cases with disinfectant wipes prior to use.

Travel for investigation:

- Employees will be required to complete a daily self-screening for symptoms of COVID-19 before traveling on official state business.
- No out-of-state travel until further notice.
- Follow the State and Local restrictions on in-state travel.
- The current TCEQ occupancy limit for traveling in a state vehicle is 1 staff member.

- Staff who travel for official state business should carry their agency-issued ID with them, along with a copy of the TCEQ Employee Travel Letter[26].
- Overnight travel within the state is permitted with Division Director approval.

On-site investigation:

- At a minimum, always wear a covering over nose and mouth within the six feet of other people.
- Abide by any safety policies instituted or requested by the RE. If at any point that you are asked to do something you feel unsafe, take actions to refuse to take such action, beginning with a verbal request and ending with a termination of the investigation.
- If wearing gloves, be mindful of cross contamination. Ensure that devices such as iPhone, iPad and cameras do not become a contamination risk.
- Replace or remove gloves prior to touching your own face or equipment.
- Limit time spent in any office, conference room, or office-like environment during the investigation.
- Always maintain at least 6 feet of distance between you and any other person. This includes greetings and introductions. Do not shake hands. Business cards can be exchanged electronically.
- Request any needed records to be provided electronically, if possible. If you do handle records, only do so with gloved hands and replace gloves afterwards.

Post-investigation:

- Disinfect all vehicles used per the Vehicle Cleaning Checklist.
- Wipe down all shared equipment storage cases with disinfectant wipes prior to storage. Ensure all shared surfaces where equipment maintenance occurred are wiped down as well. Never use disinfectant or sanitizer on any monitoring equipment or equipment components. If cleaning is necessary, a gentle biodegradable detergent on a paper towel can be used to wipe handles and straps only (avoid lenses, sensors, and other sensitive components).
- Provide exit interview, Field Citations, other guidance, and informational documents electronically after the onsite investigations, not during.
- Request photos, records, or anything that requires clarification electronically.

[26] OLS will update the current TCEQ Travel Letter which expired on April 30, 2020.

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Attachment 4

Vehicle Cleaning Checklist

The purpose of this checklist is to provide guidance for disinfecting state vehicles. Please review applicable guidance and procedures prior to returning to work including COVID-19 Workplace Health and Safety Protocols. At this time, staff are limited to one person per vehicle. Before leaving the office and upon return to the office, each driver should disinfect the vehicle as follows:

- Use disposable gloves. Use disinfecting wipes or an approved disinfectant. Reusable items should not be used.
- If making your own disinfectant, make sure you follow directions and expiration dates for all materials.
    - Recipe for DIY disinfectant (not for cloth or screens): Prepare a bleach solution by mixing 5 tablespoons (1/3rd cup) bleach per gallon of water or 4 teaspoons bleach per quart of water (expires after 24 hours).
- Vehicle cleaning should include:
    - Vehicle keys and fobs.
    - Door handles - Interior door handles and surrounding surfaces.
    - Seats - hard seats, arm rests.
    - Controls - light and air controls, radio buttons and other control knobs and devices, grab handles, windows, air vents, rear view mirror, seat adjustment controls, glove box handle and surrounding area, center console, steering wheel, wiper and turn signal stalks, shifter.
    - Other frequently touched areas - seatbelt buckles, tailgate handle, headrests, and any other surfaces that are touched.
- Disinfect any frequently touched items such as check out clip boards, pens, etc.
    - Do not use bleach spray on cloth or digital screens.
    - If surfaces are dirty, clean using a detergent or soap and water prior to disinfection.
    - For soft surfaces such as carpet or cloth seats, remove visible contamination and clean with appropriate cleaners for the surface.
    - Properly dispose of all gloves and cleaning towels in a sealed plastic bag in the designated trash cans/dumpster.
    - Wash hands immediately per CDC guidelines after gloves are removed.
- If vehicle is not able to be cleaned upon returning due to extenuating circumstance, please note on the outside of the vehicle notebook used for checkout followed by a courtesy call to your fleet manager.

Attachment 5

TCEQ Travel Letter

The TCEQ Travel Letter stating that employees perform work that supports Essential Services is posted on the internal Share*Net* COVID-19 page at the following link: https://tceq.sharepoint.com/sites/OAS/hrss/Shared%20Documents/TCEQ_Letter_for_Employee_Travel.pdf

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 1, 2020

Subject: TCEQ Employee Travel for Official State Business

To Whom It May Concern:

The Texas Commission on Environmental Quality (TCEQ) has determined that it is necessary for the holder of this letter, as an employee of the TCEQ, to perform work that directly or indirectly supports essential services on behalf of the State of Texas. To do so, this employee may need to travel to TCEQ offices or to sites where they are assigned to perform work. The holder of this letter has an ID badge to verify they are a TCEQ employee.

On March 19, 2020, Governor Abbott issued a disaster declaration that covers all counties. Pursuant to Executive Order GA-08 (March 19, 2020), "all critical infrastructure will remain operational, and governmental entities and businesses will continue providing essential services." Pursuant to Executive Order GA-14 (March 31, 2020), "local restrictions issued in response to the COVID-19 disaster do not apply to restrict the conduct of state business." Further, "all governmental entities and businesses should be allowed to continue providing essential services during the COVID-19 disaster, and all critical infrastructure should be allowed to remain operational."

The health and well-being of TCEQ employees and the public is paramount to the TCEQ. The majority of TCEQ employees are now teleworking in order to slow the spread of COVID-19 and TCEQ currently functions with a physical skeleton crew when necessary. The holder of this letter is one of the employees whose work requires his or her physical presence at a TCEQ office or work site.

If you have any questions or need additional information, please feel free to contact Kelly Cook, Director, TCEQ Critical Infrastructure Division at 512/563-3890 or Michelle Havelka, TCEQ Homeland Security Coordinator at 512/426-6715.

Sincerely,

Toby Baker, Executive Director
Texas Commission on Environmental Quality

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • tceq.texas.gov

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

ASSISTANT ADMINISTRATOR
FOR ENFORCEMENT AND
COMPLIANCE ASSURANCE

March 26, 2020

MEMORANDUM

SUBJECT: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program

FROM: Susan Parker Bodine

TO: All Governmental and Private Sector Partners

As all of us at the U.S. Environmental Protection Agency adjust to the evolving COVID-19 pandemic, we are first and foremost mindful of the health and safety of the public, as well as our staff, and those of Federal Agencies, State and Local Governments, Tribes, Regulated Entities, Contractors, and Non-governmental Organizations. The agency must take these important considerations into account as we all continue our work to protect human health and the environment. Accordingly, we are announcing the following temporary policy regarding EPA enforcement of environmental legal obligations during this time.

The EPA will exercise the enforcement discretion specified below for noncompliance covered by this temporary policy and resulting from the COVID-19 pandemic, if regulated entities take the steps applicable to their situations, as set forth in this policy. For noncompliance that occurs during the period of time that this temporary policy is in effect, and that results from the COVID-19 pandemic, this policy will apply to such noncompliance in lieu of an otherwise applicable EPA enforcement response policy.

APPLICABILITY

This policy will apply retroactively beginning on March 13, 2020. Authorized states or tribes may take a different approach under their own authorities. The EPA will undertake to coordinate with other federal agencies in situations where the EPA shares jurisdiction over a regulated entity's environmental compliance obligations.

The EPA will assess the continued need for and scope of this temporary policy on a regular basis and will update it if the EPA determines modifications are necessary. In order to provide fair and sufficient notice to the public, the EPA will post a notification here https://www.epa.gov/enforcement/enforcement-policy-guidance-publications, at least seven days prior to terminating this temporary policy.

The EPA will apply this policy to actions or omissions that occur while this policy is in effect even after the policy terminates.

SCOPE

At the EPA, we are cognizant of potential worker shortages due to the COVID-19 pandemic as well as

the travel and social distancing restrictions imposed by both governments and corporations or recommended by the Centers for Disease Control and Prevention to limit the spread of COVID-19. The consequences of the pandemic may affect facility operations and the availability of key staff and contractors and the ability of laboratories to timely analyze samples and provide results. As a result, there may be constraints on the ability of a facility or laboratory to carry out certain activities required by our federal environmental permits, regulations, and statutes. These consequences may affect reporting obligations and milestones set forth in settlements and consent decrees. Finally, these consequences may affect the ability of an operation to meet enforceable limitations on air emissions and water discharges, requirements for the management of hazardous waste, or requirements to ensure and provide safe drinking water. These are very distinct situations that the EPA plans to manage differently, as described below.

The enforcement discretion described in this temporary policy do not apply to any criminal violations or conditions of probation in criminal sentences. Appropriate consideration of potential criminal liability is discussed separately, below.

This policy does not apply to activities that are carried out under Superfund and RCRA Corrective Action enforcement instruments. Such matters will be addressed in a separate communication.

This policy does not apply to imports. We also are especially concerned about pesticide products entering the United States, or produced, manufactured, distributed in the United States, that claim to address COVID-19 impacts. The agency expects to focus on ensuring compliance with requirements applicable to these products to ensure protection of public health. Information relating to FIFRA import requirements can be found here: https://www.epa.gov/compliance/importing-and-exporting-pesticides-and-devices. This website will be updated to provide information on how to submit information via email, as may be necessary during the COVID-19 pandemic.

Finally, we realize that the general statements contained in this policy may not address every potential civil violation that may arise as a result of COVID-19. As such, the EPA may provide additional enforcement guidance applicable to specific programs on an ongoing basis and the EPA's self-disclosure program remains available.[1]

ENFORCEMENT DISCRETION

I. Civil Violations

A. General conditions

All enforcement discretion set forth in this temporary policy is conditioned on the following.

1. Entities should make every effort to comply with their environmental compliance obligations.

[1] Regulated entities who voluntarily discover, promptly disclose, expeditiously correct, and take steps to prevent recurrence of potential violations may be eligible for a reduction or elimination of any civil penalties that otherwise might apply. Most violations can be disclosed and processed via the EPA's automated online "eDisclosure" system (*see* https://www.epa.gov/compliance/epas-edisclosure). To learn more about the EPA's violation disclosure policies, including conditions for eligibility, please review the EPA's Audit Policy website at https://www.epa.gov/compliance/epas-audit-policy. Many states also offer incentives for self-policing; please check with the appropriate state agency for more information.

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2. If compliance is not reasonably practicable, facilities with environmental compliance obligations should:
    a. Act responsibly under the circumstances in order to minimize the effects and duration of any noncompliance caused by COVID-19;
    b. Identify the specific nature and dates of the noncompliance;
    c. Identify how COVID-19 was the cause of the noncompliance, and the decisions and actions taken in response, including best efforts to comply and steps taken to come into compliance at the earliest opportunity;
    d. Return to compliance as soon as possible; and
    e. Document the information, action, or condition specified in a. through d.

B. Routine compliance monitoring and reporting by regulated entities

The consequences of the pandemic may constrain the ability of regulated entities to perform routine compliance monitoring,[2] integrity testing,[3] sampling,[4] laboratory analysis,[5] training,[6] and reporting or certification.[7]

Entities should use existing procedures to report noncompliance with such routine activities, such as pursuant to an applicable permit, regulation or statute. If no such procedure is applicable, or if reporting is not reasonably practicable due to COVID-19, regulated entities should maintain this information internally and make it available to the EPA or an authorized state or tribe upon request. In general, the EPA does not expect to seek penalties for violations of routine compliance monitoring, integrity testing, sampling, laboratory analysis, training, and reporting or certification obligations in situations where the EPA agrees that COVID-19 was the cause of the noncompliance and the entity provides supporting documentation to the EPA upon request.

After this policy is no longer in effect, the EPA expects full compliance going forward. In general, absent exigent circumstances, the EPA does not plan to ask facilities to "catch-up" with missed monitoring or reporting if the underlying requirement applies to intervals of less than three months. For other monitoring or reports, such as those required on a bi-annual or annual basis, when this policy is no longer in effect, the EPA expects facilities to take reasonable measures to resume compliance activities as soon as possible, including conducting late monitoring or submitting late reports. In some programs, there are sections or codes in the reporting form in which a facility may indicate why it has not conducted the required sampling and monitoring, and the EPA encourages facilities to include such information when submitting any late reports.

Many training classes are offered on-line and such on-line training generally should not be affected by

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[2] If affected by COVID-19, this category may include, for example, CEMS and stack tests, relative accuracy test audits, LDAR monitoring, fence line monitoring, RICE readings and monitoring, tank and piping inspections, assessments, or stormwater inspections.
[3] If affected by COVID-19, this category may, for example, include tank integrity testing (e.g., API 653) for compliance with certain "good air pollution control practices."
[4] If affected by COVID-19, this category may include, for example, effluent sampling and testing, as well as cooling tower sampling.
[5] If affected by COVID-19, this category may include, for example, laboratory holding times and turn-around times.
[6] If affected by COVID-19, this category may include, for example, SPCC training, hazardous waste trainings, CAA section 129 renewals, and other annual re-certifications.
[7] If affected by COVID-19, this category may include, for example, reports and certifications associated with delayed activities described above, and late reports under permit or other regulatory obligations, including TRI and greenhouse gas inventory reporting.

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travel and social distancing constraints. If practicable, sectors mandated to function with certified operators should maintain normal certification and training practices. If not practicable due to the COVID-19 pandemic, the EPA believes that it is more important to keep experienced, trained operators on the job, even if a training or certification is missed.

If a submission to the EPA requires a "wet" signature of a responsible official, the EPA will accept a digital or other electronic signature. The mere inability to obtain a "wet" signature will not be considered a justification for failure to make a paper submission or certification. We strongly encourage the regulated community use the EPA's approved electronic reporting mechanisms. For enforcement purposes, the EPA also will accept emailed submissions even if a paper original is required.

C. Settlement agreement and consent decree reporting obligations and milestones

1. With respect to **EPA administrative settlement agreement** reporting obligations and milestones, if, as a result of COVID-19, parties to such settlement agreements anticipate missing enforceable milestones set forth in those documents, parties should utilize the notice procedures set forth in the agreement, including notification of a force majeure, as applicable. For EPA administrative settlement agreements, the EPA intends to treat routine compliance monitoring, integrity testing, sampling, laboratory analysis, training, and associated reporting or certification obligations in the manner described above and will generally not seek stipulated or other penalties for noncompliance with such obligations. The notification should provide the information required by the agreement, which typically will include steps taken to minimize the effects and duration of any noncompliance caused by COVID-19, as well as the information specified under subpart A, above. EPA staff will review these notifications and may contact a party to seek adjustments to a proposed plan of action, pursuant to the agreement.
2. With respect to **consent decrees entered into with the EPA and the U.S. Department of Justice**, these documents are agreements and court orders. EPA staff will coordinate with DOJ to exercise enforcement discretion with regard to stipulated penalties for the routine compliance obligations described in paragraph 1 and will also consult with any co-plaintiffs to seek agreement to this approach. Courts retain jurisdiction over consent decrees and may exercise their own authority. Parties should utilize the notice procedures set forth in the consent decree, including notification of a force majeure, as applicable, with respect to any noncompliance alleged to be caused by COVID-19.
3. Parties should proceed as proposed in their notice to the EPA (and to DOJ for consent decrees) unless and until contacted by the agency (if an EPA administrative settlement) or DOJ (if a judicial consent decree).

D. Facility operations

The EPA expects all regulated entities to continue to manage and operate their facilities in a manner that is safe and that protects the public and the environment.

1. Facilities should contact the appropriate implementing authority (EPA region, authorized state, or tribe) if **facility operations impacted by the COVID-19 pandemic may create an acute risk or an imminent threat to human health or the environment.** Even in authorized programs, the EPA strongly encourages facilities, states, and tribes to consult with their EPA regional office on acute risks and imminent threats. If an entity contacts the EPA due to noncompliance that could result in an acute risk or an imminent threat to human health or the environment, the EPA will act as follows.

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a. The EPA's first step will be to consult with the state or tribe, if an authorized program, to discuss measures to minimize or prevent the acute or imminent threat to health or the environment from the COVID-19-caused noncompliance. State or tribal permits or regulations may have provisions that address the situation and result in a return to compliance. Consultation with authorized states or tribes will proceed in accordance with the July 11, 2019 memorandum on *Enhancing Effective Partnerships Between EPA and States in Civil Enforcement and Compliance Assurance Work*.
b. In cases where the EPA implements the program directly:
    i. The EPA regional office will evaluate whether an applicable permit, statutory, or regulatory provision addresses the situation. The EPA's Office of Enforcement and Compliance Assurance (OECA) will work with program offices on nationwide issues that may arise.
    ii. If there is no permit/regulatory provision that addresses the situation, the EPA will work with the facility to minimize or prevent the acute or imminent threat to health or the environment from the COVID-19-caused noncompliance and obtain a return to compliance as soon as possible.
    iii. The EPA will inform the relevant state or tribe of any acute threats and actions taken in response to the noncompliance.
    iv. The EPA will consider the circumstances, including the COVID-19 pandemic, when determining whether an enforcement response is appropriate.

2. If a facility suffers from **failure of air emission control or wastewater or waste treatment systems or other facility equipment** that may result in exceedances of enforceable limitations on emissions to air or discharges to water, or land disposal, or other unauthorized releases, the facility should notify the implementing authority (EPA regional office or authorized state or tribe) as quickly as possible. The notification also should include information on the pollutants emitted, discharged, discarded, or released; the comparison between the expected emissions or discharges, disposal, or release and any applicable limitation(s); and the expected duration and timing of the exceedance(s) or releases. The EPA will consult with authorized states or tribes, as applicable, in accordance with the July 11, 2019 memorandum on *Enhancing Effective Partnerships Between EPA and States in Civil Enforcement and Compliance Assurance Work* to determine the appropriate response. Where the EPA implements the program directly, the EPA will evaluate whether the risk posed by the exceedance, disposal, or release is acute or may create an imminent threat to human health or the environment and will follow the steps set forth under paragraph 1.b. above.

3. If facility operations result in **noncompliance are not already addressed by the EPA above**, regulated entities should take the steps identified under Part I.A. The EPA will consider the circumstances, including the COVID-19 pandemic, when determining whether enforcement response is appropriate.

4. If a facility is a **generator of hazardous waste** and, due to disruptions caused by the COVID-19 pandemic, is unable to transfer the waste off-site within the time periods required under RCRA to maintain its generator status, the facility should continue to properly label and store such waste and take the steps identified under Part I.A, above. If these steps are met, as an exercise of enforcement discretion, the EPA will treat such entities to be hazardous waste generators, and not treatment, storage and disposal facilities. In addition, as an exercise of enforcement discretion, the EPA will treat Very Small Quantity Generators and Small Quantity Generators as

retaining that status, even if the amount of hazardous waste stored on site exceeds a regulatory volume threshold due to the generator's inability to arrange for shipping of hazardous waste off of the generator's site due to the COVID-19 pandemic.

5. If a facility is an **animal feeding operation**, and, due to disruptions caused by the COVID-19 pandemic, is unable to transfer animals off-site and, solely as a result of the pandemic, meets the regulatory definition of concentrated animal feeding operation (CAFO), as an exercise of enforcement discretion, the EPA will not treat such animal feeding operations as CAFOs (or will not treat small CAFOs as medium CAFOs, or medium CAFOs as large CAFOs). To receive this enforcement discretion an operation must take the steps identified under Part I.A, above.

E. Public water systems regulated under the Safe Drinking Water Act

Public water systems have a heightened responsibility to protect public health because unsafe drinking water can lead to serious illnesses and access to clean water for drinking and handwashing is critical during the COVID-19 pandemic. Accordingly, the EPA has heightened expectations for public water systems. The EPA expects operators of such systems to continue normal operations and maintenance as well as required sampling to ensure the safety of our drinking water supplies. The EPA expects laboratories performing analysis for water systems to continue to provide timely analysis of samples and results. States play the lead role on drinking water issues, but the EPA also has important drinking water enforcement and oversight responsibilities, including direct implementation responsibilities in some locations.

In the event of worker shortages in the water sector, the EPA will consider continued operation of drinking water systems to be the highest priority. In anticipation of worker shortage and laboratory capacity problems, the EPA considers the following tiers of compliance monitoring to assure the safety of our drinking water supplies and prioritize prevention of acute risks. Of highest priority is monitoring required under National Primary Drinking Water Regulations to protect against microbial pathogens. Additional priorities include nitrate/nitrite and Lead and Copper Rule monitoring followed by contaminants for which the system has been non-compliant. States may wish to adopt similar priorities.

The EPA is working closely with our federal partners, states, and other organizations to ensure resources and personnel are available to assist facilities facing staffing and contractor challenges during this period of COVID-19 response and the Office of Water plans to launch a website with this information. Accordingly, the EPA strongly encourages public water systems to consult with the state and EPA regional offices without delay if issues arise that prevent the normal delivery of safe drinking water and encourages states to continue to work closely with the EPA on measures to address the potential impacts of COVID-19. The EPA also encourages certified drinking water laboratories to consult with the state and the EPA if issues arise that prevent laboratories from conducting analyses of drinking water contaminants.

The EPA will consider the circumstances, including the COVID-19 pandemic, when determining whether any enforcement response is appropriate at public water systems acting in accordance with this subpart.

F. Critical infrastructure

In situations where a facility is essential critical infrastructure, the EPA may consider a more tailored short-term No Action Assurance, with conditions to protect the public, if the EPA determines it is in the

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public interest. Such determinations are made by the OECA Assistant Administrator on a case-by-case basis. The EPA will consider essential the facilities that employ essential critical infrastructure workers as determined by guidance issued by the Cybersecurity and Infrastructure Security Agency.

II. State Oversight

The EPA will continue State Review Framework reviews, and other state program oversight, as practicable, taking into consideration priority work in response to COVID-19. Until such time as dictated by travel and social distancing restrictions, the EPA believes states should take into account the safety and health of their inspectors and facility personnel and use discretion when making decisions to conduct routine inspections, notwithstanding any applicable compliance monitoring strategy. The EPA will take the COVID-19 pandemic into consideration in any review of a state compliance and enforcement program, such as the State Review Framework.

III. EPA Actions

During the pendency of the current COVID-19 exigency, the EPA expects to focus its resources largely on situations that may create an acute risk or imminent threat to public health or the environment, to ensure protection against such risks or threats. All ongoing enforcement matters are continuing.

IV. Accidental Releases

Nothing in this temporary policy relieves any entity from the responsibility to prevent, respond to, or report accidental releases of oil, hazardous substances, hazardous chemicals, hazardous waste, and other pollutants, as required by federal law, or should be read as a willingness to exercise enforcement discretion in the wake of such a release.

V. Criminal Violations

The considerations described above apply to the vast majority of people and businesses who are making good faith efforts to comply with their obligations in this difficult time. Federal environmental statutes generally authorize criminal penalties for knowing conduct that violates the law. In screening cases to determine when to seek prosecutorial assistance from DOJ, the EPA will distinguish violations that facilities know are unavoidable as a result of COVID-19 restrictions from violations that are the result of an intentional disregard for the law. EPA's Criminal Investigative Division remains vigilant and is prepared to pursue violators who demonstrate a criminal *mens rea*.

This temporary policy makes EPA offices and the EPA's governmental and private sector partners, as well as the general public, aware of how the EPA intends to exercise its enforcement discretion with respect to certain compliance situations during the exigencies of the COVID-19 pandemic. This memorandum does not alter any provision of any statute or regulation that contains legally binding requirements, and it is not itself a regulation.

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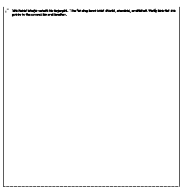
Message

From: Emily Lindley [Emily.Lindley@tceq.texas.gov]
Sent: 4/10/2020 3:49:25 PM
To: McQueen, Ken [McQueen.Ken@epa.gov]
Subject: Re: MEMORANDUM: Interim Guidance on Site Field Work Decisions Due to Impacts of COVID-19

Thank you Sir. Hope you have a safe and happy Easter!

Emily Lindley
Commissioner
Texas Commission on Environmental Quality



Sent from my iPhone

On Apr 10, 2020, at 10:14 AM, McQueen, Ken <McQueen.Ken@epa.gov> wrote:

Region 6 Colleagues,
I wanted to share this Interim Guidance just issued by OLEM.

Also, I wanted to pass along OECA FAQ's.
https://www.epa.gov/enforcement/frequent-questions-about-temporary-covid-19-enforcement-policy#3

Ken McQueen
Region 6 Administrator (AR, LA, NM, OK, TX)
US Environmental Protection Agency
Dallas, TX 75270
(214) 665-2100

<image001.png>

<Interim Guidance on Site Field Work Decisions Due to Impacts of COVID-19 4-10-20-signed.pdf>
<Attachment - OLEM Posture COVID-19 final 3-19-20.pdf>

Message

From: McQueen, Ken [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D4C84E96E1EB42C6968C5DB174DA124E-MCQUEEN, KE]
Sent: 4/10/2020 3:13:00 PM
To: 'Kenneth.Wagner@ee.ok.gov' [Kenneth.Wagner@ee.ok.gov]; Kenney, James, NMENV [James.Kenney@state.nm.us]; keogh@adeq.state.ar.us; Chuck Brown [Chuck.Brown@LA.GOV]; Toby Baker [Toby.Baker@tceq.texas.gov]; Jon Niermann [Jon.Niermann@Tceq.Texas.Gov]; Emily Lindley [Emily.Lindley@tceq.texas.gov]; bobby.janecka@tceq.texas.gov
Subject: MEMORANDUM: Interim Guidance on Site Field Work Decisions Due to Impacts of COVID-19
Attachments: Interim Guidance on Site Field Work Decisions Due to Impacts of COVID-19 4-10-20-signed.pdf; Attachment - OLEM Posture COVID-19 final 3-19-20.pdf

Importance: High

Region 6 Colleagues,
I wanted to share this Interim Guidance just issued by OLEM.

Also, I wanted to pass along OECA FAQ's.
https://www.epa.gov/enforcement/frequent-questions-about-temporary-covid-19-enforcement-policy#3

Ken McQueen
Region 6 Administrator (AR, LA, NM, OK, TX)
US Environmental Protection Agency
Dallas, TX 75270
(214) 665-2100

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

April 10, 2020

MEMORANDUM

SUBJECT: Interim Guidance on Site Field Work Decisions Due to Impacts of COVID-19[1]

FROM: Peter C. Wright
Assistant Administrator,
Office of Land and Emergency Management

PETER WRIGHT Digitally signed by PETER WRIGHT Date: 2020.04.10 08:34:12 -04'00'

Susan Parker Bodine
Assistant Administrator,
Office of Enforcement and Compliance Assurance

SUSAN BODINE Digitally signed by SUSAN BODINE Date: 2020.04.10 08:41:43 -04'00'

TO: EPA Regional Administrators, Regions I-X

As all of us at the EPA and in other Federal Agencies, State and Local Governments, Tribes, Regulated Entities, Non-governmental Organizations, and Communities continue to adjust to the evolving COVID-19 situation, we at EPA are first and foremost mindful of the health, welfare, and safety of the public, as well as our employees and cleanup partners, as we all continue our work to protect human health and the environment.

Response field activities are underway at sites across the country under a range of EPA authorities including, but not limited to, the Superfund program, RCRA corrective action, TSCA PCB cleanup provisions, the Oil Pollution Act, and the Underground Storage Tank (UST) program. EPA also conducts emergency responses to releases or substantial threats of releases into the environment of chemicals, oil, and other hazardous materials/substances, as well as pollutants or contaminants that may present an imminent and substantial danger to the public health or welfare. The following interim guidance is being issued for response actions related to cleanup and emergency response sites where EPA is the lead agency or has direct oversight of or responsibility for the work being performed. EPA will, as appropriate, update this guidance as the current situation evolves. The response action work at this broad range of sites may be conducted by EPA, states, tribes, other agencies of the Federal Government, and by other parties, including potentially responsible parties (PRPs). In addition, Regions are encouraged to share this guidance with the states and employ these considerations to provide assistance to authorized states as they encounter similar issues for state-lead RCRA cleanups.

In respect of the challenges posed by the COVID-19 situation, EPA continues to make decisions about continuing on-site activities on a case-by-case basis consistent with the following priorities:

---

[1] This memorandum supplements the "Office of Land and Emergency Management Considerations and Posture for COVID-19 Pandemic" document dated March 19, 2020 (*see* Attachment) and provides additional criteria to be considered for Emergency Response, Superfund Removal/Remedial/Federal Facilities, RCRA Corrective Action, and leaking underground storage tank (LUST) cleanups when determining whether site field work should continue or be suspended.

- Protecting the health and safety of the public, as well as maintaining the health and safety of EPA staff and cleanup partners, is the Agency's highest priority. Integral to the protection of health and safety is the adherence to any federal, state, tribal, or local health declarations and restrictions, to the extent possible.
- Maintaining EPA's ability to prevent and respond to environmental emergencies, or in any situation necessary to protect public health and welfare and the environment, is also a critical priority for the Agency.

Decisions to be made on continuing, reducing, or pausing field work are to be made on a case-by-case basis and in consultation with other EPA offices, as appropriate. This same approach will apply to decisions based on requests from outside parties (e.g., states, tribes, local governments, other federal agencies, potentially responsible parties, property owners, etc.) for extensions or delays in performance.

General Guidance for Response Field Work Decisions

The Regions should evaluate, and periodically re-evaluate, the status of ongoing response work at sites and the possible impact of COVID-19 on sites, surrounding communities, EPA personnel, and response/cleanup partners. Especially in areas where federal, state, tribal, or local health declarations are in effect due to COVID-19, Regions should consider whether to continue site operations or secure a site until the public health threat associated with the declaration is resolved. While on-site response actions may start or continue where there are no federal, state, tribal or local health declarations that prohibit or discourage such activities, in making decisions whether to start or continue work, other factors must also be weighed in making this decision including but not limited to the safety and availability of work crews, EPA, state or tribal staff; the critical nature of the work; logistical challenges (e.g., transportation, lodging, availability of meals, etc.); and other factors particular to a site. Where a region decides to start or continue work, it must review and modify, as appropriate, a response action's health and safety plan (HASP) to ensure that it accounts for CDC's (and/or other's) COVID-19 guidelines, including any potential virus transmission into or across areas. If a decision is made to temporarily pause work, Regions should continue to monitor site conditions and plan the logistics for safely resuming field work as soon as appropriate.

Regions should consider pre-construction, construction, and post-construction activities. Regional representatives' travel to a response action site should consider any federal, state, tribal, or local health department restrictions or advisories, the logistics associated with the necessary travel, the timing of the travel (i.e., whether it could be delayed or postponed), and other factors that address federal travel.[2] EPA Regional response personnel, in consultation with their leadership (e.g., Removal Managers, Remedial Branch Chiefs, and Division Directors) and Safety, Health, and Environmental Management organizations, should ensure that the health and safety of response personnel are protected, with respect to COVID-19, as they plan for and/or respond to releases or substantial threats of releases into the environment of chemical, oil, or other hazardous materials/substances, as well as pollutants or contaminants that may present an imminent and substantial danger to the public health or welfare. EPA should consider the personal safety of responding party personnel as well, including compliance with travel

[2] https://www.whitehouse.gov/wp-content/uploads/2020/03/M-20-14-travel-guidance-OMB-1.pdf

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restrictions, health and safety regulations, and access to personal protective equipment and lodging.

Parties who believe that COVID-19 restrictions may delay their performance of obligations should consult the applicable enforcement instrument, including provisions allowing for adjustments to schedules to be made at the discretion of EPA's project manager and/or force majeure provisions,[3] for directions on providing the requisite notice and other information described in the provisions. Modifications to a party's performance obligations will be made on a case-by case basis in accordance with the terms of the applicable enforcement instrument. The formal determination as to whether a particular situation constitutes force majeure or requires additional response depends on the site-specific circumstances, particularly the type of work that is affected by COVID-19. EPA expects to be able to make these determinations promptly. EPA encourages parties (and the lead agency for Federal Facility Superfund sites) to regularly communicate with EPA project managers about the status of their sites and associated field work and any anticipated challenges and mitigation measures.

Regions are expected to work to provide notification to, coordinate with, and collaborate with States, Tribes, and other Federal agencies to optimize communication and share information about the status of particular response work.

Factors to Consider for Site Field Work Decisions

Below are some site-specific factors that should be part of a Region's decision regarding whether response actions will continue, be reduced, or be paused. Consideration of these factors should help with making nationally consistent decisions when addressing similar factual situations. However, these factors should not be considered in a manner that would override protection against unnecessary potential exposure to COVID-19. Decisions to extend obligations or pause work obligations do not operate to supersede or amend enforcement instruments. Instead, and as set forth above, the applicable enforcement instruments contain provisions allowing for adjustments to schedules to be made at the discretion of EPA's project manager, and/or force majeure provisions, including directions to responsible parties on providing the requisite notice and other information described in the provisions.

Regions have decided and may continue to decide to reduce or suspend response actions at particular sites for the following or similar situations:

- State, tribal, or local health officials have requested particular site operations or types of operations that would pertain to particular sites be suspended.
- Any site workers have tested positive for or exhibited symptoms of COVID-19.
- Any sites where there may be close interaction with high risk groups or those under quarantine, such as work inside homes.
- Sites where contractor field personnel are not able to work due to state, tribal, or local travel restrictions or medical quarantine.
- Other sites where social distancing is not possible.

[3] To the extent available under the instrument, EPA intends to be flexible regarding the timing of the notices.

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Regarding site-specific work decisions, Regional management should consider the following factors:

- Whether failure to continue response actions would likely pose an imminent and substantial endangerment to human health or the environment, and whether it is practical to continue such actions.
    - This may include sites or activities such as:
        - Emergency Responses (including Superfund and Oil Spill Responses)
        - Emergency Response Preparedness necessary to remain ready to respond immediately
        - Time Critical Removal Actions that address imminent threat to public health and welfare and the environment
    - It may include sites with ongoing or a threat of imminent acute or direct human exposures that would compromise public health:
        - EPA or responsible parties (including Federal facilities) providing alternative water supplies (e.g., bottled water, Point of Entry Systems (POET Systems), replacement filters, etc.) to individuals who otherwise would be exposed to or consume contaminated drinking water
        - Individuals with ongoing on-site exposures, such as lead, arsenic, other heavy metals, PCBs, asbestos, vapor intrusion, etc.
    - It may also include sites with prevention of exposures that pose an imminent threat to public health and welfare and the environment:
        - Response actions to prevent a catastrophic event (e.g., mine blow outs, breach of gyp stacks, sites with high probability of fire or explosion, etc.)
        - Prevent contaminated groundwater plume expansion that is reasonably likely to adversely affect drinking water sources (private or public), including continued operation of groundwater pump and treat systems
        - Prevent releases to waterbodies that are reasonably likely to adversely affect drinking water intakes or communities downstream, including treatment of acid mine drainage
        - On-site security or activities necessary to prevent unauthorized access to sites for the safety of life and/or the protection of government property
        - Disposal of materials off-site (e.g., mine waste, chat, unsafe cylinders) that create an imminent safety issue if not promptly removed
        - Assess potential or actual vapor intrusion, especially into structures with sensitive populations (consideration should be given to the relative risks and be coordinated with residents as appropriate)
        - Complete, continue, or take measures to stabilize in-process response actions to ensure unacceptable releases to the environment do not occur (e.g., deactivation and decommissioning of a former nuclear facility, soil excavation, partial closure of a landfill disposal cell)
- Whether maintaining any response actions would lead to a reduction in human health risk/exposure within the ensuing six months. This may include, but are not limited to:
    - Vapor intrusion investigations

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    - Residential site work with current exposures to residents
    - Drinking water work
- Whether work that would not provide near-term reduction in human health risk could be more strongly considered for delay, suspension, or rescheduling of site work, in coordination with state, tribal, and local officials and with updated HASPs as appropriate. This may include:
    - Periodic monitoring
    - Routine sampling activities that typically are considered for five-year reviews or compliance with existing agreements
    - Field sampling for remedial investigation/feasibility study (RI/FS) or RCRA facility investigation (RFI) work
    - Active remediation of otherwise stable conditions (e.g. active remediation of stable groundwater plumes)

Effects on Non-Field Site Work

Note that much of the work to advance cleanup of sites is performed away from sites. To the extent remote workstations permit project teams to work during this time, this work should continue. Important work can be conducted virtually and represent opportunities to make progress on primary activities like investigation reports (including pre-NPL work), modeling, negotiations between the parties, decision documents, cleanup documentation, workplans, progress reports, and maintaining compliance with obligations such as financial assurance. It is also recognized that because of the national scope of COVID-19, some work that normally takes place away from a site may be impacted because supporting operations (e.g. laboratories, equipment) and materials are unavailable or have been diverted to other uses in consideration of the national interests. Parties who believe that COVID-19 restrictions may delay their performance of non-field related work should consult the procedures set forth in the applicable enforcement instrument.

Next Steps When Pausing Site Work

Continued vigilance and communication are vital. If a decision is made to temporarily reduce or suspend response action work, Regions should continue to monitor site conditions and plan the logistics for resuming field work when appropriate. Throughout this process, Regions should utilize the internal EPA document, CERCLA Interim Guidance on Public Engagement During COVID-19, to continue conducting Superfund community involvement work at all sites, regardless of whether work has been paused or continues.

CC: Office of General Counsel
OLEM Program Office Directors
OECA Program Office Directors
SEMD Directors, Regions I-X
LCARD Directors, Regions I-X

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Message

From: Kristi Mills-Jurach [Kristi.Mills-Jurach@tceq.texas.gov]
Sent: 4/20/2020 3:37:05 PM
To: Roberts, Lou [Roberts.Lou@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]
CC: Kendra Houston [kendra.houston@tceq.texas.gov]; Marilyn Gates [marilyn.gates@tceq.texas.gov]; Melissa Keller [melissa.keller@tceq.texas.gov]
Subject: DRAFT Request for temporary modification for RCRA CMS
Attachments: EPA Letter_RCRA.docx

Good morning!

We appreciate your willingness to discuss options for meeting our CMS commitments for FY20 in light of the current COVID-19 related orders. Attached is a draft request for your review. We would appreciate your feedback before we formally submit. We are available for a call if you'd like to discuss in more detail.

Kristi Mills-Jurach, P.E.
Director, Program Support and Environmental Assistance
TCEQ Office of Compliance and Enforcement
(512) 239-1261

EPA Letter- RCRA

April X, 2020

Ms. Margaret Osbourne, Chief
Waste Enforcement Branch
United States Environmental Protection Agency Region 6
1201 Elm Street, Suite 500
Mail Code: ECDS
Dallas, Texas 75270-210

Re: Update to the Resource Conservation and Recovery Act (RCRA) Compliance Monitoring Strategy (CMS), the Texas Commission on Environmental Quality's (TCEQ) Alternative Plan for RCRA Compliance Monitoring, and Fiscal Year (FY) 20 CMS

Dear Ms. Osbourne,

On August 1, 2019, the Texas Commission on Environmental Quality (TCEQ) submitted the workplan for the alternative RCRA CMS for implementation in TCEQ's FY20 (September 1, 2019 through August 31, 2020), On March 31, 2020, Texas Governor Greg Abbott (the Governor) issued Executive Order GA-14 relating to statewide continuity of essential services and activities during the COVID-19 disaster. Within this order, the Governor references the U.S. Department of Homeland Security Guidance on the Essential Critical Infrastructure Workforce, Version 2.0, issued March 28, 2020, which provides an advisory list of critical-infrastructure sectors, workers, and functions that should continue during the COVID-19 response. In accordance with this guidance and order, TCEQ is limiting on-site investigations to on-demand activities with a human health, safety, or environmental concern until the statewide or an applicable local order is lifted. TCEQ is continuing to conduct off-site investigations and record reviews.

In accordance with the Governor's order and in the interest of safety for the staff of TCEQ and regulated entities, TCEQ is requesting a temporary modification to the RCRA CMS Alternative Plan to allow for off-site reviews in place of on-site compliance evaluation inspections (CEIs) for certain facilities that are due for a CEI in FY20. This Alternative Plan would be applied to the non-Federal Treatment, Storage, and Disposal Facilities (TSDFs). Facilities that are due for a CEI that have not already received an on-site investigation during this fiscal year may be considered for this type of review and would be prioritized based on factors such as compliance history, regional knowledge, and cooperation from the regulated entity.

The off-site CEI would:

- include the review of required documentation based on the investigation checklists for that facility;
- focus on the types of activities performed at that site;

- be reported in RCRA-CME as a CEI

In conducting the off-site CEI, investigators may request more current information or other records as needed to determine compliance with RCRA requirements. This could include photographic or video evidence collected by the regulated entity; additional telephone interviews; and review of available information including satellite imagery. The TCEQ may also schedule on-site follow-up investigations as needed after the orders are lifted.

This request is limited to non-federal TSDF facilities that are due for a CEI in FY20 where TCEQ staff determine that an off-site investigation, with additional information from the regulated entity, can result in an adequate determination of compliance. The TCEQ intends to return to the Approved CMS Alternative Plan once COVID-19 related orders are lifted, and the regulated community has returned to normal operations. Facilities that are not good candidates for the off-site alternatives will receive an on-site CEI once orders are lifted. This may result in some TSDF CEIs planned in FY20 to be conducted in FY21.

Off-site CEI are not being proposed for other investigations included in the RCRA Alternative CMS, including federal TSDFs, large quantity generators and equivalents. These will be postponed until facilities return to normal operations and are able to support on-site comprehensive inspections. This may impact the specific facilities that were planned for FY20. Any changes to the facility lists or overall ability to meet the CMS targets will be communicated prior to the end of FY20.

Considering current conditions, we greatly appreciate the U.S. EPA's willingness to continue discussions on flexibility. Thank you for your time and attention. The TCEQ looks forward to a continued partnership with the U.S. EPA regarding compliance monitoring under the RCRA monitoring program.

Should you have questions or need any additional information, please feel free to contact me at (512) 239-1261 or Marilyn Gates at (512) 239-4662.

Sincerely,

Kristi Mills-Jurach, P.E.
Director, Program Support and Environmental Assistance Division
Office of Compliance and Enforcement
Texas Commission on Environmental Quality

Enclosures

cc: Lou Roberts, Waste Enforcement Branch, Enforcement and Compliance Assurance Division, U.S. EPA Region 6

Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 4/21/2020 8:07:30 PM
To: Kristi Mills-Jurach [Kristi.Mills-Jurach@tceq.texas.gov]; Roberts, Lou [Roberts.Lou@epa.gov]
CC: Kendra Houston [kendra.houston@tceq.texas.gov]; Marilyn Gates [marilyn.gates@tceq.texas.gov]; Melissa Keller [melissa.keller@tceq.texas.gov]
Subject: RE: DRAFT Request for temporary modification for RCRA CMS

Hi Kristi:

Thanks for the opportunity to review. We are going to have to coordinate ultimate approval of a request like this with OECA, and we are having a discussion with them and the other Regions tomorrow on this general topic. In the meantime, here are the Region's comments:

1) We are supportive of TCEQ adopting offsite inspections during this timeframe.
2) We may need to discuss how to code these offsite inspections – the Region codes these as NRRs (Nonfinancial Records Reviews) rather than CEIs. This is a topic that OECA will need to weigh in on
3) The state could consider adding an assessment of the RCRA Air NCI as part of its offsite inspections (i.e. AABBCC). Such reviews could include 1) the monitoring requirements, 2) exempt equipment under RCRA, 3) engineering specs of pressure relief valves and tank closure devices, and 4) overall records (see below). Below is some language pulled out of a draft national EPA Enforcement Alert currently under development:

Monitoring Requirement Review: The regulations require facilities to properly monitor certain process vents, equipment, tanks, containers, and surface impoundments. Monitoring may include visual, audible, and olfactory detection methods among other methods, or by use of instrumentation meeting the performance criteria of Reference Method 21 (40 CFR Part 60 Appendix A) which is used for detecting emissions (*e.g.*, leaks, defects, or exceedances of No Detectable Emissions). Monitoring violations may arise where instrument (*i.e.*, photo or flame ionization detector (PID or FID)) calibration is faulty or incomplete, or the required monitoring is not performed correctly, accurately, or with the proper frequency as required in the regulations. Compliance with the regulations requires that facilities actively look for emissions. Proactive monitoring will bring attention to, and identify equipment failures resulting from ruptured discs, flanges, and gaskets. Monitoring for releases is critical and can result in early detection of minor emissions before larger emissions occur.

Review of exempt equipment under RCRA Air: The regulations provide criteria that should be used to determine whether equipment is exempt from the RCRA air regulations and it is important that facilities correctly and carefully apply these criteria to determine whether the exemptions are and are not met. One example is the Subpart BB exemption where a piece of equipment contains or contacts Subpart BB regulated waste for *less than* 300 hours per calendar year. *See* 40 CFR § 264.1050(f) and 40 CFR § 265.1050(e). This is a cumulative hour requirement (not consecutive hours) over the course of a year. Whether or not in service, if the unit contains or contacts residuals that meet the Subpart BB applicability threshold of 10 percent by weight organics for 300 or more hours per calendar year it is subject to the air emission requirements. *See* 62 Fed. Reg. 64,641 (1997). Facilities cannot assert the less than 300-hour per calendar year exemption without positively identifying and recording the piece of equipment in the operating record. Units must be identified in the operating record, either by list or location (area or group) of equipment that contains or contacts hazardous waste with an organic concentration of 10 percent by weight for less than 300 hours per calendar year." *See* 40 CFR §§ 264/ 265.1064(g)(6).

Engineering specs of pressure relief valves and tank closure devices: Inspectors can review the tank design operating pressure and the waste vapor pressure managed in the tank in order to ensure the adequacy of the waste tank as well as determine the set pressure for the pressure relief valve.

Conducting thorough record reviews: Ensure a facility is meeting requirements for equipment identification, location, tagging, leak detection monitoring, calibration of instrumentation, and leak repair timeframes, among other documentation requirements.

Thanks,
Margaret

From: Kristi Mills-Jurach <Kristi.Mills-Jurach@tceq.texas.gov>
Sent: Monday, April 20, 2020 10:37 AM
To: Roberts, Lou <Roberts.Lou@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Kendra Houston <kendra.houston@tceq.texas.gov>; Marilyn Gates <marilyn.gates@tceq.texas.gov>; Melissa Keller <melissa.keller@tceq.texas.gov>
Subject: DRAFT Request for temporary modification for RCRA CMS

Good morning!

We appreciate your willingness to discuss options for meeting our CMS commitments for FY20 in light of the current COVID-19 related orders. Attached is a draft request for your review. We would appreciate your feedback before we formally submit. We are available for a call if you'd like to discuss in more detail.

Kristi Mills-Jurach, P.E.
Director, Program Support and Environmental Assistance
TCEQ Office of Compliance and Enforcement
(512) 239-1261

Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 4/21/2020 12:19:14 PM
To: Kristi Mills-Jurach [Kristi.Mills-Jurach@tceq.texas.gov]; Roberts, Lou [Roberts.Lou@epa.gov]
CC: Kendra Houston [kendra.houston@tceq.texas.gov]; Marilyn Gates [marilyn.gates@tceq.texas.gov]; Melissa Keller [melissa.keller@tceq.texas.gov]
Subject: RE: DRAFT Request for temporary modification for RCRA CMS

Hi Kristi:

Thanks for the opportunity to review. I'll get you some comments by 3:30 pm today.

Thanks again,
Margaret

From: Kristi Mills-Jurach <Kristi.Mills-Jurach@tceq.texas.gov>
Sent: Monday, April 20, 2020 10:37 AM
To: Roberts, Lou <Roberts.Lou@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Kendra Houston <kendra.houston@tceq.texas.gov>; Marilyn Gates <marilyn.gates@tceq.texas.gov>; Melissa Keller <melissa.keller@tceq.texas.gov>
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Kristi Mills-Jurach, P.E.
Director, Program Support and Environmental Assistance
TCEQ Office of Compliance and Enforcement
(512) 239-1261

Message

From: Richard Groshong [Richard.Groshong@deq.ok.gov]
Sent: 3/26/2020 9:15:23 PM
To: Schaub, Lisa [Schaub.Lisa@epa.gov]; Lutz, Timothy J. [tlutz@cabq.gov]; Maldonado, Angelique (admaldonado@cabq.gov) [admaldonado@cabq.gov]; McKinstry, Michael W. [mmckinstry@cabq.gov]; Pomo, Elizabeth [epomo@cabq.gov]; Reyes, Damon R. [dreyes@cabq.gov]; Hollenberg, Cindy, NMENV [Cindy.Hollenberg@state.nm.us]; shannon.duran@state.nm.us; Fitzgerald, Tom, NMENV [Tom.Fitzgerald@state.nm.us]; Morris, Allan, NMENV [Allan.Morris@state.nm.us]; OBrien, Edward, NMENV [Edward.OBrien@state.nm.us]; Camas Frey [Camas.Frey@deq.ok.gov]; Drake Hanna [drake.hanna@deq.ok.gov]; Brad Flaming [Brad.Flaming@deq.ok.gov]; Holly Taber [holly.taber@deq.ok.gov]; Jeff Dye [Jeff.Dye@deq.ok.gov]; Jonathan Truong [Jonathan.Truong@deq.ok.gov]; Jose Blanco [Jose.Blanco@deq.ok.gov]; Madison Miller [Madison.Miller@deq.ok.gov]; Michael Provence [Mike.Provence@deq.ok.gov]; Preston Loving [Preston.Loving@deq.ok.gov]; Anderson, Lee (lee.anderson@adeq.state.ar.us) [lee.anderson@adeq.state.ar.us]; BAILEYE_adeq.state.ar.us [BAILEYE@adeq.state.ar.us]; braun@adeq.state.ar.us; Gage, Hannah [gageh@adeq.state.ar.us]; Kimbrough, Demetria [kimbrough@adeq.state.ar.us]; Brian Fontenot [Brian.Fontenot@LA.GOV]; Keith Jordan (keith.jordan@la.gov) [keith.jordan@LA.GOV]; Maggie Turner [Maggie.Turner@LA.GOV]; Misty Huffman (Misty.Huffman@LA.GOV) [Misty.Huffman@LA.GOV]; sarah.acosta@la.gov; Stacy Martinez [Stacy.Martinez@LA.GOV]; Keith Sheedy [keith.sheedy@tceq.texas.gov]; Kendra Houston [kendra.houston@tceq.texas.gov]; Kristi Mills-Jurach [kristi.mills-jurach@tceq.texas.gov]; Marilyn Gates [marilyn.gates@tceq.texas.gov]; Michael Delacruz [michael.delacruz@tceq.texas.gov]; Michael Miller [michael.miller@tceq.texas.gov]; Mingyuan Wei [Mingyuan.Wei@tceq.texas.gov]; Nelson Chafetz [nelson.chafetz@tceq.texas.gov]; Tory Mack [Tory.Mack@tceq.texas.gov]
Subject: RE: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program

Thank you, Lisa. And just to clarify, this can be shared with industry, correct?

Rick Groshong
Environmental Programs Manager III
Compliance and Enforcement Group
Department of Environmental Quality - Air Quality Division
707 N. Robinson, P.O. Box 1677
Oklahoma City, OK 73101-1677
Main: 405-702-4100
Direct: 405-702-4150
Fax: 405-702-4101

From: Schaub, Lisa <Schaub.Lisa@epa.gov>
Sent: Thursday, March 26, 2020 3:41 PM
To: Lutz, Timothy J. <tlutz@cabq.gov>; Maldonado, Angelique (admaldonado@cabq.gov) <admaldonado@cabq.gov>; McKinstry, Michael W. <mmckinstry@cabq.gov>; Pomo, Elizabeth <epomo@cabq.gov>; Reyes, Damon R. <dreyes@cabq.gov>; Hollenberg, Cindy, NMENV <Cindy.Hollenberg@state.nm.us>; shannon.duran@state.nm.us; Fitzgerald, Tom, NMENV <Tom.Fitzgerald@state.nm.us>; Morris, Allan, NMENV <Allan.Morris@state.nm.us>; OBrien, Edward, NMENV <Edward.OBrien@state.nm.us>; Camas Frey <Camas.Frey@deq.ok.gov>; Drake Hanna <drake.hanna@deq.ok.gov>; Brad Flaming <Brad.Flaming@deq.ok.gov>; Richard Groshong <Richard.Groshong@deq.ok.gov>; Holly Taber <Holly.Taber@deq.ok.gov>; Jeff Dye <Jeff.Dye@deq.ok.gov>; Jonathan Truong <Jonathan.Truong@deq.ok.gov>; Jose Blanco <Jose.Blanco@deq.ok.gov>; Madison Miller <Madison.Miller@deq.ok.gov>; Michael Provence <Mike.Provence@deq.ok.gov>; Preston Loving <Preston.Loving@deq.ok.gov>; Anderson, Lee (lee.anderson@adeq.state.ar.us) <lee.anderson@adeq.state.ar.us>; BAILEYE_adeq.state.ar.us <BAILEYE@adeq.state.ar.us>; braun@adeq.state.ar.us; Gage, Hannah <gageh@adeq.state.ar.us>; Kimbrough, Demetria <kimbrough@adeq.state.ar.us>; Brian Fontenot <Brian.Fontenot@LA.GOV>; Keith Jordan (keith.jordan@la.gov) <keith.jordan@LA.GOV>; Maggie Turner <Maggie.Turner@LA.GOV>; Misty Huffman (Misty.Huffman@LA.GOV) <Misty.Huffman@LA.GOV>; sarah.acosta@la.gov; Stacy Martinez <Stacy.Martinez@LA.GOV>; Keith Sheedy <keith.sheedy@tceq.texas.gov>; Kendra Houston

<kendra.houston@tceq.texas.gov>; Kristi Mills-Jurach <kristi.mills-jurach@tceq.texas.gov>; Marilyn Gates <marilyn.gates@tceq.texas.gov>; Michael Delacruz <michael.delacruz@tceq.texas.gov>; Michael Miller <michael.miller@tceq.texas.gov>; Mingyuan Wei <Mingyuan.Wei@tceq.texas.gov>; Nelson Chafetz <nelson.chafetz@tceq.texas.gov>; Tory Mack <Tory.Mack@tceq.texas.gov>
Subject: [External] FW: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program

Okay, here's the link straight from the source. I have confirmed that Steve will be working tomorrow should you need anything before I return Monday.

Lisa Schaub
EPA Region 6
214-665-8583

From: Bodine, Susan <bodine.susan@epa.gov>
Sent: Thursday, March 26, 2020 3:19 PM
To: OECA All <OECA_All@epa.gov>; Regional Counsels and Deputies <Regional_Counsels_and_Deputies@epa.gov>; ECAD Directors and Deputies-Designees <ECAD_Directors_and_Deputies-Designees@epa.gov>; Enforcement Coordinators <Enforcement_Coordinators@epa.gov>; Leadership_Assistant_Administrators <Leadership_Assistant_Administrators@epa.gov>; Leadership_Deputy_Assistant_Administrators <Leadership_Deputy_Assistant_Administrators@epa.gov>; Leadership_Regional_Administrators <Leadership_Regional_Administrators@epa.gov>; Leadership_Deputy_Regional_Administrators <Leadership_Deputy_Regional_Administrators@epa.gov>; Regional Enforcement Staff <Regional_Enforcement_Staff@epa.gov>; Regional Enforcement Manager Contacts <Regional_Enforcement_Manager_Contacts@epa.gov>; Gunasekara, Mandy <gunasekara.Mandy@epa.gov>
Subject: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program

Colleagues:

As you know, ongoing efforts to limit the spread of COVID-19 have created unprecedented challenges for the regulated community. We remain mindful of the health and safety of the public, as well as our staff, and those of other Federal Agencies, State and Local Governments, Tribes, Regulated Entities, Contractors, and Non-governmental Organizations. We are taking these important considerations into account as we all continue our work to protect human health and the environment. Accordingly, we have developed a temporary policy regarding EPA enforcement of environmental legal obligations during the COVID-19 pandemic.

EPA will assess the continued need for and scope of this temporary policy on a regular basis and will update it if EPA determines modifications are necessary.

Susan

Susan Parker Bodine
Assistant Administrator
Office of Enforcement and Compliance Assurance
202-564-2440

Message

From: Schaub, Lisa [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=60845154B65B427B8A7993241F81D36B-SCHAUB, LIS]
Sent: 3/26/2020 9:25:38 PM
To: Richard Groshong [Richard.Groshong@deq.ok.gov]; Lutz, Timothy J. [tlutz@cabq.gov]; Maldonado, Angelique (admaldonado@cabq.gov) [admaldonado@cabq.gov]; McKinstry, Michael W. [mmckinstry@cabq.gov]; Pomo, Elizabeth [epomo@cabq.gov]; Reyes, Damon R. [dreyes@cabq.gov]; Hollenberg, Cindy, NMENV [Cindy.Hollenberg@state.nm.us]; shannon.duran@state.nm.us; Fitzgerald, Tom, NMENV [Tom.Fitzgerald@state.nm.us]; Morris, Allan, NMENV [Allan.Morris@state.nm.us]; OBrien, Edward, NMENV [Edward.OBrien@state.nm.us]; Camas Frey [Camas.Frey@deq.ok.gov]; Drake Hanna [drake.hanna@deq.ok.gov]; Brad Flaming [Brad.Flaming@deq.ok.gov]; Holly Taber [holly.taber@deq.ok.gov]; Jeff Dye [Jeff.Dye@deq.ok.gov]; Jonathan Truong [Jonathan.Truong@deq.ok.gov]; Jose Blanco [Jose.Blanco@deq.ok.gov]; Madison Miller [Madison.Miller@deq.ok.gov]; Michael Provence [Mike.Provence@deq.ok.gov]; Preston Loving [Preston.Loving@deq.ok.gov]; Anderson, Lee (lee.anderson@adeq.state.ar.us) [lee.anderson@adeq.state.ar.us]; BAILEYE_adeq.state.ar.us [BAILEYE@adeq.state.ar.us]; braun@adeq.state.ar.us; Gage, Hannah [gageh@adeq.state.ar.us]; Kimbrough, Demetria [kimbrough@adeq.state.ar.us]; Brian Fontenot [Brian.Fontenot@LA.GOV]; Keith Jordan (keith.jordan@la.gov) [keith.jordan@LA.GOV]; Maggie Turner [Maggie.Turner@LA.GOV]; Misty Huffman (Misty.Huffman@LA.GOV) [Misty.Huffman@LA.GOV]; sarah.acosta@la.gov; Stacy Martinez [Stacy.Martinez@LA.GOV]; Keith Sheedy [keith.sheedy@tceq.texas.gov]; Kendra Houston [kendra.houston@tceq.texas.gov]; Kristi Mills-Jurach [kristi.mills-jurach@tceq.texas.gov]; Marilyn Gates [marilyn.gates@tceq.texas.gov]; Michael Delacruz [michael.delacruz@tceq.texas.gov]; Michael Miller [michael.miller@tceq.texas.gov]; Mingyuan Wei [Mingyuan.Wei@tceq.texas.gov]; Nelson Chafetz [nelson.chafetz@tceq.texas.gov]; Tory Mack [Tory.Mack@tceq.texas.gov]
Subject: RE: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program

Yes, the direct link is on the public website.
https://www.epa.gov/sites/production/files/2020-03/documents/oecamemooncovid19implications.pdf

Lisa Schaub
EPA Region 6
214-665-8583

From: Richard Groshong <Richard.Groshong@deq.ok.gov>
Sent: Thursday, March 26, 2020 4:15 PM
To: Schaub, Lisa <Schaub.Lisa@epa.gov>; Lutz, Timothy J. <tlutz@cabq.gov>; Maldonado, Angelique (admaldonado@cabq.gov) <admaldonado@cabq.gov>; McKinstry, Michael W. <mmckinstry@cabq.gov>; Pomo, Elizabeth <epomo@cabq.gov>; Reyes, Damon R. <dreyes@cabq.gov>; Hollenberg, Cindy, NMENV <Cindy.Hollenberg@state.nm.us>; shannon.duran@state.nm.us; Fitzgerald, Tom, NMENV <Tom.Fitzgerald@state.nm.us>; Morris, Allan, NMENV <Allan.Morris@state.nm.us>; OBrien, Edward, NMENV <Edward.OBrien@state.nm.us>; Camas Frey <Camas.Frey@deq.ok.gov>; Drake Hanna <drake.hanna@deq.ok.gov>; Brad Flaming <Brad.Flaming@deq.ok.gov>; Holly Taber <holly.taber@deq.ok.gov>; Jeff Dye <Jeff.Dye@deq.ok.gov>; Jonathan Truong <Jonathan.Truong@deq.ok.gov>; Jose Blanco <Jose.Blanco@deq.ok.gov>; Madison Miller <Madison.Miller@deq.ok.gov>; Michael Provence <Mike.Provence@deq.ok.gov>; Preston Loving <Preston.Loving@deq.ok.gov>; Anderson, Lee (lee.anderson@adeq.state.ar.us) <lee.anderson@adeq.state.ar.us>; BAILEYE_adeq.state.ar.us <BAILEYE@adeq.state.ar.us>; braun@adeq.state.ar.us; Gage, Hannah <gageh@adeq.state.ar.us>; Kimbrough, Demetria <kimbrough@adeq.state.ar.us>; Brian Fontenot <Brian.Fontenot@LA.GOV>; Keith Jordan (keith.jordan@la.gov) <keith.jordan@LA.GOV>; Maggie Turner <Maggie.Turner@LA.GOV>; Misty Huffman (Misty.Huffman@LA.GOV) <Misty.Huffman@LA.GOV>; sarah.acosta@la.gov; Stacy Martinez <Stacy.Martinez@LA.GOV>; Keith Sheedy <keith.sheedy@tceq.texas.gov>; Kendra Houston <kendra.houston@tceq.texas.gov>; Kristi Mills-Jurach <kristi.mills-jurach@tceq.texas.gov>; Marilyn Gates <marilyn.gates@tceq.texas.gov>; Michael Delacruz <michael.delacruz@tceq.texas.gov>; Michael Miller <michael.miller@tceq.texas.gov>; Mingyuan Wei <Mingyuan.Wei@tceq.texas.gov>; Nelson Chafetz

<nelson.chafetz@tceq.texas.gov>; Tory Mack <Tory.Mack@tceq.texas.gov>
Subject: RE: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program

Thank you, Lisa. And just to clarify, this can be shared with industry, correct?

Rick Groshong
Environmental Programs Manager III
Compliance and Enforcement Group
Department of Environmental Quality - Air Quality Division
707 N. Robinson, P.O. Box 1677
Oklahoma City, OK 73101-1677
Main: 405-702-4100
Direct: 405-702-4150
Fax: 405-702-4101

From: Schaub, Lisa <Schaub.Lisa@epa.gov>
Sent: Thursday, March 26, 2020 3:41 PM
To: Lutz, Timothy J. <tlutz@cabq.gov>; Maldonado, Angelique (admaldonado@cabq.gov) <admaldonado@cabq.gov>; McKinstry, Michael W. <mmckinstry@cabq.gov>; Pomo, Elizabeth <epomo@cabq.gov>; Reyes, Damon R. <dreyes@cabq.gov>; Hollenberg, Cindy, NMENV <Cindy.Hollenberg@state.nm.us>; shannon.duran@state.nm.us; Fitzgerald, Tom, NMENV <Tom.Fitzgerald@state.nm.us>; Morris, Allan, NMENV <Allan.Morris@state.nm.us>; OBrien, Edward, NMENV <Edward.OBrien@state.nm.us>; Camas Frey <Camas.Frey@deq.ok.gov>; Drake Hanna <drake.hanna@deq.ok.gov>; Brad Flaming <Brad.Flaming@deq.ok.gov>; Richard Groshong <Richard.Groshong@deq.ok.gov>; Holly Taber <Holly.Taber@deq.ok.gov>; Jeff Dye <Jeff.Dye@deq.ok.gov>; Jonathan Truong <Jonathan.Truong@deq.ok.gov>; Jose Blanco <Jose.Blanco@deq.ok.gov>; Madison Miller <Madison.Miller@deq.ok.gov>; Michael Provence <Mike.Provence@deq.ok.gov>; Preston Loving <Preston.Loving@deq.ok.gov>; Anderson, Lee (lee.anderson@adeq.state.ar.us) <lee.anderson@adeq.state.ar.us>; BAILEYE_adeq.state.ar.us <BAILEYE@adeq.state.ar.us>; braun@adeq.state.ar.us; Gage, Hannah <gageh@adeq.state.ar.us>; Kimbrough, Demetria <kimbrough@adeq.state.ar.us>; Brian Fontenot <Brian.Fontenot@LA.GOV>; Keith Jordan (keith.jordan@la.gov) <keith.jordan@LA.GOV>; Maggie Turner <Maggie.Turner@LA.GOV>; Misty Huffman (Misty.Huffman@LA.GOV) <Misty.Huffman@LA.GOV>; sarah.acosta@la.gov; Stacy Martinez <Stacy.Martinez@LA.GOV>; Keith Sheedy <keith.sheedy@tceq.texas.gov>; Kendra Houston <kendra.houston@tceq.texas.gov>; Kristi Mills-Jurach <kristi.mills-jurach@tceq.texas.gov>; Marilyn Gates <marilyn.gates@tceq.texas.gov>; Michael Delacruz <michael.delacruz@tceq.texas.gov>; Michael Miller <michael.miller@tceq.texas.gov>; Mingyuan Wei <Mingyuan.Wei@tceq.texas.gov>; Nelson Chafetz <nelson.chafetz@tceq.texas.gov>; Tory Mack <Tory.Mack@tceq.texas.gov>
Subject: [External] FW: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program

Okay, here's the link straight from the source. I have confirmed that Steve will be working tomorrow should you need anything before I return Monday.

Lisa Schaub
EPA Region 6
214-665-8583

From: Bodine, Susan <bodine.susan@epa.gov>
Sent: Thursday, March 26, 2020 3:19 PM
To: OECA All <OECA_All@epa.gov>; Regional Counsels and Deputies <Regional_Counsels_and_Deputies@epa.gov>; ECAD Directors and Deputies-Designees <ECAD_Directors_and_Deputies-Designees@epa.gov>; Enforcement Coordinators <Enforcement_Coordinators@epa.gov>; Leadership_Assistant_Administrators <Leadership_Assistant_Administrators@epa.gov>; Leadership_Deputy_Assistant_Administrators <Leadership_Deputy_Assistant_Administrators@epa.gov>; Leadership_Regional_Administrators

<Leadership_Regional_Administrators@epa.gov>; Leadership_Deputy_Regional_Administrators <Leadership_Deputy_Regional_Administrators@epa.gov>; Regional Enforcement Staff <Regional_Enforcement_Staff@epa.gov>; Regional Enforcement Manager Contacts <Regional_Enforcement_Manager_Contacts@epa.gov>; Gunasekara, Mandy <gunasekara.Mandy@epa.gov>
Subject: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program

Colleagues:

As you know, ongoing efforts to limit the spread of COVID-19 have created unprecedented challenges for the regulated community. We remain mindful of the health and safety of the public, as well as our staff, and those of other Federal Agencies, State and Local Governments, Tribes, Regulated Entities, Contractors, and Non-governmental Organizations. We are taking these important considerations into account as we all continue our work to protect human health and the environment. Accordingly, we have developed a temporary policy regarding EPA enforcement of environmental legal obligations during the COVID-19 pandemic.

EPA will assess the continued need for and scope of this temporary policy on a regular basis and will update it if EPA determines modifications are necessary.

Susan

Susan Parker Bodine
Assistant Administrator
Office of Enforcement and Compliance Assurance
202-564-2440

Message

From: Schaub, Lisa [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=60845154B65B427B8A7993241F81D36B-SCHAUB, LIS]
Sent: 3/26/2020 8:41:00 PM
To: Lutz, Timothy J. [tlutz@cabq.gov]; Maldonado, Angelique (admaldonado@cabq.gov) [admaldonado@cabq.gov]; McKinstry, Michael W. [mmckinstry@cabq.gov]; Pomo, Elizabeth [epomo@cabq.gov]; Reyes, Damon R. [dreyes@cabq.gov]; Cindy Hollenberg [Cindy.Hollenberg@state.nm.us]; Duran, Shannon, NMENV (Shannon.Duran@state.nm.us) [Shannon.Duran@state.nm.us]; Fitzgerald, Tom, NMENV [Tom.Fitzgerald@state.nm.us]; Morris, Allan, NMENV [Allan.Morris@state.nm.us]; OBrien, Edward, NMENV [Edward.OBrien@state.nm.us]; Camas Frey [camas.frey@deq.ok.gov]; Drake Hanna [drake.hanna@deq.ok.gov]; Flaming, Brad [Brad.Flaming@deq.ok.gov]; Groshong, Richard [Richard.Groshong@deq.ok.gov]; holly.taber@deq.ok.gov; Jeff Dye [jeff.dye@deq.ok.gov]; Jon Truong [Jonathan.Truong@deq.ok.gov]; Jose Blanco [Jose.Blanco@deq.ok.gov]; Madison Miller [Madison.Miller@deq.ok.gov]; Michael Provence (mike.provence@deq.ok.gov) [mike.provence@deq.ok.gov]; Preston Loving [preston.loving@deq.ok.gov]; Anderson, Lee (lee.anderson@adeq.state.ar.us) [lee.anderson@adeq.state.ar.us]; BAILEYE_adeq. state. ar. us (BAILEYE@adeq.state.ar.us) [BAILEYE@adeq.state.ar.us]; braun (braun@adeq.state.ar.us) [braun@adeq.state.ar.us]; Gage, Hannah [gageh@adeq.state.ar.us]; Kimbrough, Demetria [kimbrough@adeq.state.ar.us]; Brian Fontenot [Brian.Fontenot@LA.GOV]; Keith Jordan (keith.jordan@la.gov) [keith.jordan@la.gov]; Maggie Turner [Maggie.Turner@la.gov]; Misty Huffman (Misty.Huffman@LA.GOV) [Misty.Huffman@LA.GOV]; Sarah Acosta (Sarah.Acosta@LA.GOV) [Sarah.Acosta@LA.GOV]; Stacy Martinez [Stacy.Martinez@LA.GOV]; Keith Sheedy [keith.sheedy@tceq.texas.gov]; Kendra Houston [kendra.houston@tceq.texas.gov]; Kristi.Mills-Jurach@tceq.texas.gov; Marily Gates [marilyn.gates@tceq.texas.gov]; Michael Delacruz [Michael.Delacruz@tceq.texas.gov]; Michael.Miller@Tceq.Texas.Gov; Mingyuan Wei [Mingyuan.Wei@Tceq.Texas.Gov]; Nelson Chafetz [nelson.chafetz@tceq.texas.gov]; Tory Mack [Tory.Mack@Tceq.Texas.Gov]
Subject: FW: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program

Okay, here's the link straight from the source. I have confirmed that Steve will be working tomorrow should you need anything before I return Monday.

Lisa Schaub
EPA Region 6
214-665-8583

From: Bodine, Susan <bodine.susan@epa.gov>
Sent: Thursday, March 26, 2020 3:19 PM
To: OECA All <OECA_All@epa.gov>; Regional Counsels and Deputies <Regional_Counsels_and_Deputies@epa.gov>; ECAD Directors and Deputies-Designees <ECAD_Directors_and_Deputies-Designees@epa.gov>; Enforcement Coordinators <Enforcement_Coordinators@epa.gov>; Leadership_Assistant_Administrators <Leadership_Assistant_Administrators@epa.gov>; Leadership_Deputy_Assistant_Administrators <Leadership_Deputy_Assistant_Administrators@epa.gov>; Leadership_Regional_Administrators <Leadership_Regional_Administrators@epa.gov>; Leadership_Deputy_Regional_Administrators <Leadership_Deputy_Regional_Administrators@epa.gov>; Regional Enforcement Staff <Regional_Enforcement_Staff@epa.gov>; Regional Enforcement Manager Contacts <Regional_Enforcement_Manager_Contacts@epa.gov>; Gunasekara, Mandy <gunasekara.Mandy@epa.gov>
Subject: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program

Colleagues:

As you know, ongoing efforts to limit the spread of COVID-19 have created unprecedented challenges for the regulated community. We remain mindful of the health and safety of the public, as well as our staff, and those of other Federal Agencies, State and Local Governments, Tribes, Regulated Entities, Contractors, and Non-governmental Organizations. We are taking these important considerations into account as we all continue our work to protect human

health and the environment. Accordingly, we have developed a temporary policy regarding EPA enforcement of environmental legal obligations during the COVID-19 pandemic.

EPA will assess the continued need for and scope of this temporary policy on a regular basis and will update it if EPA determines modifications are necessary.

Susan

Susan Parker Bodine
Assistant Administrator
Office of Enforcement and Compliance Assurance
202-564-2440

Message

From: Seager.Cheryl@epa.gov [Seager.Cheryl@epa.gov]
Sent: 3/26/2020 10:06:23 PM
To: James Kenney [James.Kenney@state.nm.us]; Scott Thompson [Scott.Thompson@deq.ok.gov]; Lourdes Iturralde [Lourdes.Iturralde@LA.GOV]; keogh@adeq.state.ar.us; Ramiro.Garcia@tceq.texas.gov
Subject: Fwd: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program

Hi everyone - just a follow up to our call today - HQ has asked us to
Sent from my iPhone

Begin forwarded message:

> **From:** "Bodine, Susan" <bodine.susan@epa.gov>
> **Date:** March 26, 2020 at 3:18:41 PM CDT
> **To:** OECA All <OECA_All@epa.gov>, Regional Counsels and Deputies <Regional_Counsels_and_Deputies@epa.gov>, ECAD Directors and Deputies-Designees <ECAD_Directors_and_Deputies-Designees@epa.gov>, Enforcement Coordinators <Enforcement_Coordinators@epa.gov>, Leadership_Assistant_Administrators <Leadership_Assistant_Administrators@epa.gov>, Leadership_Deputy_Assistant_Administrators <Leadership_Deputy_Assistant_Administrators@epa.gov>, Leadership_Regional_Administrators <Leadership_Regional_Administrators@epa.gov>, Leadership_Deputy_Regional_Administrators <Leadership_Deputy_Regional_Administrators@epa.gov>, Regional Enforcement Staff <Regional_Enforcement_Staff@epa.gov>, Regional Enforcement Manager Contacts <Regional_Enforcement_Manager_Contacts@epa.gov>, "Gunasekara, Mandy" <gunasekara.Mandy@epa.gov>
> **Subject: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program**
>
> Colleagues:
>
> As you know, ongoing efforts to limit the spread of COVID-19 have created unprecedented challenges for the regulated community. We remain mindful of the health and safety of the public, as well as our staff, and those of other Federal Agencies, State and Local Governments, Tribes, Regulated Entities, Contractors, and Non-governmental Organizations. We are taking these important considerations into account as we all continue our work to protect human health and the environment. Accordingly, we have developed a temporary policy regarding EPA enforcement of environmental legal obligations during the COVID-19 pandemic.
>
> EPA will assess the continued need for and scope of this temporary policy on a regular basis and will update it if EPA determines modifications are necessary.
>
> Susan
>
> Susan Parker Bodine
> Assistant Administrator
> Office of Enforcement and Compliance Assurance
> 202-564-2440

Message

From: Ramiro Garcia [ramiro.garcia@tceq.texas.gov]
Sent: 5/5/2020 5:13:09 PM
To: Darcey, Larry [LDarcey@marathonpetroleum.com]; OCE [OCE@tceq.texas.gov]
CC: Clingan, Mark A. [maclingan@marathonpetroleum.com]; Sweeley, Brian J. [bjsweeley@marathonpetroleum.com]; Livings, Vicky G. [vglivings@marathonpetroleum.com]; Kaysen, Eric R. [ErKaysen@marathonpetroleum.com]; Cade, Ruth A. [racade@marathonpetroleum.com]; Bogard, Kevin D. [kdbogard@marathonpetroleum.com]; TCEQR12AIR [TCEQR12AIR@tceq.texas.gov]; Jonathan Walling [jonathan.walling@tceq.texas.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]; EXECDIR [EXECDIR@tceq.texas.gov]; 'rschultz@gchd.org' [rschultz@gchd.org]; Elizondo, Julian J. [JElizondo2@marathonpetroleum.com]; Bordes, Randy M. [rmbordes@marathonpetroleum.com]; Tracy Miller [tracy.miller@tceq.texas.gov]; Susan Johnson [susan.johnson@tceq.texas.gov]; Jayme Sadlier [jayme.sadlier@tceq.texas.gov]; Monica Aplin [Monica.Aplin@tceq.texas.gov]; Jacqueline Cullather [Jacqueline.Cullather@tceq.texas.gov]
Subject: RE: MPC Request #3 related to COVID-19 Response - Blanchard GBR

Good morning Mr. Darcey,

This email confirms receipt of your correspondence. We are reviewing your request and expect to have a response soon.

Best regards,

Ramiro Garcia, Jr.
Deputy
Office of Compliance & Enforcement
TCEQ

From: Darcey, Larry <LDarcey@marathonpetroleum.com>
Sent: Tuesday, May 5, 2020 11:16 AM
To: Ramiro Garcia <ramiro.garcia@tceq.texas.gov>; OCE <OCE@tceq.texas.gov>
Cc: Clingan, Mark A. <maclingan@marathonpetroleum.com>; Sweeley, Brian J. <bjsweeley@marathonpetroleum.com>; Livings, Vicky G. <vglivings@marathonpetroleum.com>; Kaysen, Eric R. <ErKaysen@marathonpetroleum.com>; Cade, Ruth A. <racade@marathonpetroleum.com>; Bogard, Kevin D. <kdbogard@marathonpetroleum.com>; TCEQR12AIR <TCEQR12AIR@tceq.texas.gov>; Jonathan Walling <jonathan.walling@tceq.texas.gov>; 'Seager.cheryl@Epa.gov' <Seager.cheryl@Epa.gov>; 'Kelley.rosemarie@epa.gov' <Kelley.rosemarie@epa.gov>; EXECDIR <EXECDIR@tceq.texas.gov>; 'rschultz@gchd.org' <rschultz@gchd.org>; Elizondo, Julian J. <JElizondo2@marathonpetroleum.com>; Bordes, Randy M. <rmbordes@marathonpetroleum.com>
Subject: RE: MPC Request #3 related to COVID-19 Response - Blanchard GBR
Importance: High

Mr. Garcia,

Please find the following enforcement discretion requests for the Blanchard Refining Company LLC (Blanchard) Galveston Bay Refinery (GBR) due to impacts from the COVID-19 pandemic. (Air Account # GB-0004-L, RN 102535077, CN 604166868)

Request #1: Blanchard is requesting enforcement discretion to delay compliance testing at the Dock 30 F-708 Thermal Oxidizer (EPN 294-2) as required by 40 CFR 63 Subpart Y and Special Condition 41 of Permit No. 47256 on June 10, 2020 and April 26, 2020, respectively.

Request #2: Blanchard is requesting enforcement discretion to delay Hydrogen Cyanide (HCN) stack testing at Fluid Catalytic Cracking Unit No. 3 (FCCU3, EPN 34A) as required by Special Condition 41 of Permit No. 47256 by May 5, 2020.

Reason for Requests #1 & #2: Due to lower market demand resulting from the COVID-19 pandemic, Dock 30 and FCCU3 are not operating at sufficient throughput and production rates for the testing to be representative of worst case operating scenarios. Therefore, in order to perform a valid performance test the testing will need to be delayed until more representative maximum rates are achieved. The length of the delay is also necessary since a scheduled turnaround will impact rates during the month of June 2020.

Duration: Blanchard requests approval to delay the performance testing until at least July 31, 2020. If sufficient production rates are not achievable by that date, Blanchard will request another extension to ensure the tests are conducted at proper operating conditions.

Rule Citation/Permit Condition: 40 CFR 63 Subpart Y, Special Condition 41 of Air Permit No. 47256 and Title V Permit No. O-1541 GBR

Mitigation Measures: No mitigation measures are planned since stack testing will occur in a timely manner when necessary operating rates are achieved. There will be no impact to the environment by delaying these performance tests.

Thank you for your time and consideration with this matter. If you have any questions or comments please feel free to contact me at (409) 502-9009 or ldarcey@marathonpetroleum.com.

Sincerely,

Larry G. Darcey, P.E.
Environmental Supervisor
Marathon Petroleum Company

2401 5th Avenue South
Texas City, Texas 77590
Office: 409-943-7497
Cell: 409-502-9009
Email: ldarcey@marathonpetroleum.com

Message

From: Darcey, Larry [LDarcey@marathonpetroleum.com]
Sent: 5/5/2020 4:16:29 PM
To: 'ramiro.garcia@tceq.texas.gov' [ramiro.garcia@tceq.texas.gov]; 'OCE' [OCE@tceq.texas.gov]
CC: Clingan, Mark A. [maclingan@marathonpetroleum.com]; Sweeley, Brian J. [bjsweeley@marathonpetroleum.com]; Livings, Vicky G. [vglivings@marathonpetroleum.com]; Kaysen, Eric R. [ErKaysen@marathonpetroleum.com]; Cade, Ruth A. [racade@marathonpetroleum.com]; Bogard, Kevin D. [kdbogard@marathonpetroleum.com]; 'TCEQR12AIR@tceq.texas.gov' [TCEQR12AIR@tceq.texas.gov]; 'Jonathan Walling' [jonathan.walling@tceq.texas.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]; 'execdir@tceq.texas.gov' [execdir@tceq.texas.gov]; 'rschultz@gchd.org' [rschultz@gchd.org]; Elizondo, Julian J. [JElizondo2@marathonpetroleum.com]; Bordes, Randy M. [rmbordes@marathonpetroleum.com]
Subject: RE: MPC Request #3 related to COVID-19 Response - Blanchard GBR

Importance: High

Mr. Garcia,

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Sincerely,

Larry G. Darcey, P.E.
Environmental Supervisor
Marathon Petroleum Company

2401 5th Avenue South
Texas City, Texas 77590
Office: 409-943-7497
Cell: 409-502-9009
Email: ldarcey@marathonpetroleum.com

Message

From: Salvador, Vincent A [Vincent.A.Salvador@invista.com]
Sent: 3/25/2020 2:56:58 PM
To: oce@tceq.texas.gov
CC: ramiro.garcia@tceq.texas.gov; Seager, Cheryl [Seager.Cheryl@epa.gov]; susan.clewis@tceq.texas.gov; King, Stephanie [Stephanie.King@invista.com]
Subject: COVID-19 Request for Enforcement Discretion, INVISTA Victoria

INVISTA S.a r.l. Victoria Site (TCEQ RN102663671)("INVISTA") is requesting enforcement discretion due to the impact from the COVID-19 (coronavirus) on INVISTA and/or third-party resources. INVISTA has implemented a reduced onsite workforce plan necessary to prevent the spread of COVID-19 in the workplace, to protect the health of our employees and third-party resources, and to ensure the continuity of our operations. Summarized below are the details of the request:

- Due to teleworking implemented at the INVISTA Victoria Site, INVISTA is requesting the ability to submit electronically via email any notifications and/or reports required to be submitted via mail or courier in hard copy form. (Reports submitted electronically, i.e., via STEERS, will continue to be submitted electronically.) This request covers reports or notifications under all various environmental permits and/or regulations applicable at the site, including but not limited to:
    - Title V permits: O-1415, O-1867, O-1902 and O-1904;
    - NSR permits: 809, 810, 812, 813, 7186, 9560, 23271, and 31376;
    - RCRA permit: HW50393;
    - CWA permits: WQ0000476000, WDW-004, WDW-028, WDW-029, WDW-030, WDW-105, WDW-106, WDW-142, WDW-143, WDW-144;
    - USTs: 30 TAC 334;
    - Water rights: 18-3861A;
    - Delegated Federal Environmental Regulations:
        - 40 CFR 60 Subparts A, D, Db, G, GG, Kb, Va, VVa, KKK, NNN, RRR and JJJJ;
        - 40 CFR 61 Subparts A, BB, and FF;
        - 40 CFR 63 Subparts A, F, G, H, DD, UU, YY, EEE, EEEE, FFFF and DDDDD;
        - 40 CFR 65; and
        - 40 CFR Parts 144 – 149; and Parts 260 – 279;
    - State Environmental Regulations; and
    - Texas Audit Privilege Act.
- INVISTA Victoria also requests to utilize if necessary DocuSign® for electronic signatures on any or all electronic submittals.
- INVISTA Victoria site anticipates this relief to continue to be necessary during the pendency of telework recommendations by local, state and federal authorities, including but not limited to, the State of Texas and the CDC.
- INVISTA Victoria will submit PDF versions of the report and/or notification via email to TCEQ Austin, at oce@tceq.texas.gov; to the Region 14 appropriate media team leader; to the appropriate TCEQ staff contact, if known; and to EPA Region 6, where copies to EPA are also required.

INVISTA Victoria will maintain adequate records to document activities related to this instance of noncompliance, including details of INVISTA's efforts to comply.

If you have any questions or need additional information to approve this request, please contact Stephanie King, copied above, or via cell at 281-687-5121.

Regards,

Vincent A. Salvador
Site Manager
INVISTA – Victoria Site

Message

From: Ramiro Garcia [ramiro.garcia@tceq.texas.gov]
Sent: 3/23/2020 6:04:58 PM
To: Flosenzier, Vance [Vance.Flosenzier@invista.com]; OCE [OCE@tceq.texas.gov]
CC: Seager, Cheryl [Seager.Cheryl@epa.gov]; Kathy Sauceda [Kathy.Sauceda@tceq.texas.gov]; Brittain, Christopher O. [Christopher.Brittain@invista.com]
Subject: RE: COVID-19 Request for Enforcement Discretion

Hello Mr. Flosenzier,

This email serves as receipt of your correspondence. We are reviewing your request and expect to have an answer soon.

Best regards,

Ramiro Garcia, Jr.

Deputy

Office of Compliance & Enforcement

TCEQ

From: Flosenzier, Vance <Vance.Flosenzier@invista.com>
Sent: Monday, March 23, 2020 12:27 PM
To: OCE <OCE@tceq.texas.gov>
Cc: Ramiro Garcia <ramiro.garcia@tceq.texas.gov>; Seager.Cheryl@epa.gov; Kathy Sauceda <Kathy.Sauceda@tceq.texas.gov>; Brittain, Christopher O. <Christopher.Brittain@invista.com>
Subject: COVID-19 Request for Enforcement Discretion

INVISTA S.a r.l. Orange Site (TCEQ RN104392626) ("INVISTA") is requesting enforcement discretion due to the impact from the COVID-19 (coronavirus) on INVISTA and/or third-party resources. INVISTA has implemented a reduced onsite workforce plan necessary to prevent the spread of COVID-19 in the workplace, to protect the health of our employees and third-party resources, and to ensure the continuity of our operations. Summarized below are the details of the request:

- Due to teleworking implemented at the INVISTA Orange Site, INVISTA is requesting the ability to submit electronically via email any notifications and/or reports required to be submitted via mail or courier in hard copy form. (Reports submitted electronically, i.e., via STEERS, will continue to be submitted electronically.) This request covers reports or notifications under the all various environmental permits and/or regulations applicable at the site, including but not limited to:
    - Title V permits: O-1898 and O-1897;
    - NSR permits: 1790, 1302, 1303, and 1387;
    - RCRA permit: HW50395;
    - CWA permits: TXR05DA93, TXR05R439, WDW-054, WDW-055, WDW-191 and WDW-282;
    - Delegated Federal Environmental Regulations:

        - 40 CFR 60 Subparts A, D, Db, Kb, KKK, NNN, and RRR;
        - 40 CFR 63 Subparts A, F, G, H, YY, EEE, EEEE, and FFFF;
        - 40 CFR 65; and
        - 40 CFR Parts 144 – 149; and Parts 260 – 279;
    - State Environmental Regulations; and
    - Texas Audit Privilege Act.
- INVISTA Orange also requests to utilize if necessary DocuSign® for electronic signatures on any or all electronic submittals.
- INVISTA Orange site anticipates this relief to continue to be necessary during the pendency of telework recommendations by local, state and federal authorities, including but not limited to, the State of Texas and the CDC.
- INVISTA Orange will submit PDF versions of the report and/or notification via email to TCEQ Austin, at oce@tceq.texas.gov; to the Region 10 appropriate media team leader; to the appropriate TCEQ staff contact, if known; and to EPA Region 6, where copies to EPA are also required.

INVISTA Orange will maintain adequate records to document activities related to this instance of noncompliance, including details of INVISTA's efforts to comply.

If you have any questions or need additional information to approve this request, please contact me via email or cellphone (361-212-5192).

Regards,

Vance Flosenzier

Technical Manager

INVISTA – Orange Site

Message

From: Flosenzier, Vance [Vance.Flosenzier@invista.com]
Sent: 3/23/2020 5:27:25 PM
To: OCE@tceq.texas.gov
CC: Ramiro.Garcia@tceq.texas.gov; Seager, Cheryl [Seager.Cheryl@epa.gov]; kathy.sauceda@tceq.texas.gov; Brittain, Christopher O. [Christopher.Brittain@invista.com]
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Vance Flosenzier

Technical Manager

INVISTA – Orange Site

Message

From: Thomas S. Andersen / FPC Environment [tandersen@fpcusa.com]
Sent: 6/10/2020 12:29:05 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]
CC: Grace Chang / FPC Environmental Communications [gchang2@fpcusa.com]; Stephanie Schmidt/FTEHSF [StephanieSchmidt@ftpc.fpcusa.com]; Mary Bachynsky/FPC Environmental Dept. [mbachynsky@fpcusa.com]; Frey, Sarah [frey.sarah@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; 'eecdcopy.enrd@usdoj.gov' [eecdcopy.enrd@usdoj.gov]; 'ramiro.garcia@tceq.texas.gov' [ramiro.garcia@tceq.texas.gov]; 'anna.treadwell@tceq.texas.gov' [anna.treadwell@tceq.texas.gov]; 'mary.smith@texasattorneygeneral.gov' [mary.smith@texasattorneygeneral.gov]; Rick Crabtree/FPC Vice President and General Manager [RickC@ftpc.fpcusa.com]; 'scott.cernich@usdoj.gov' [scott.cernich@usdoj.gov]; 'Bob Stewart - Kelly Hart (bob.stewart@kellyhart.com)' [bob.stewart@kellyhart.com]
Subject: RE: 3rd party LDAR Audit Point Comfort, TX- Proposed extension as a result of Covid-19
Attachments: ATT00001.txt

Marcia,

As we had indicated in our last correspondence to US EPA, Formosa has been evaluating the Covid-19 situation for a safe opportunity to conduct the 3rd party LDAR audit of the FPC TX facility while recognizing that we also need to coordinate schedules of all involved (Site personnel, plant operations and contractor availability).

After discussions with the FPC TX site environmental personnel, our contract partner Montrose Environmental and Corporate Environmental staff, we feel we can safely conduct the 3rd party CD LDAR audit beginning Monday July 6, 2020. Based on previous audits conducted at this facility, we anticipate the field portion of the audit will conclude on July 10, 2020.

The FPC TX facility has recently changed its Covid-19 policies that now allows for contract visitors to enter the facility while practicing safe distancing and other CDC recommended guidelines (e.g. face masks). Montrose Environmental will now use all personnel based out of their Texas operations instead of some personnel that were to be sourced from California. This will eliminate any potential exposure issues that could be associated with airplane travel.

Please let me know if you would like to discuss further or if you have any questions. We look forward to hearing back from you on this matter at your earliest convenience.

Regards,

Formosa Plastics

Thomas S. Andersen
Formosa Plastics Corporation, U.S.A.
9 Peach Tree Hill Road
Livingston, NJ 07039
(w) 973.716.7257

From: Thomas S. Andersen / FPC Environment
Sent: Monday, May 11, 2020 3:34 PM
To: 'Moncrieffe, Marcia'; 'seager.cheryl@epa.gov'
Cc: Grace Chang / FPC Environmental Communications; Stephanie Schmidt/FTEHSF; Mary Bachynsky/FPC Environmental Dept.; Frey, Sarah; Barnett, Cheryl; Murdock, Russell; eecdcopy.enrd@usdoj.gov; ramiro.garcia@tceq.texas.gov; anna.treadwell@tceq.texas.gov; mary.smith@texasattorneygeneral.gov; Rick Crabtree/FPC Vice President and General Manager; scott.cernich@usdoj.gov; Bob Stewart - Kelly Hart (bob.stewart@kellyhart.com)
Subject: RE: 3rd party LDAR Audit Point Comfort, TX- Proposed extension as a result of Covid-19

Hi Marcia,

I hope this note finds you well. Attached is our response to your request regarding rescheduling the consent decree LDAR audit. Please let me know if you would like to discuss further.

Regards,

Thomas S. Andersen
Formosa Plastics Corporation, U.S.A.
9 Peach Tree Hill Road
Livingston, NJ 07039
(w) 973.716.7257

From: Moncrieffe, Marcia [mailto:Moncrieffe.Marcia@epa.gov]
Sent: Friday, April 17, 2020 5:57 PM
To: Thomas S. Andersen / FPC Environment; Bob Stewart; scott.cernich@usdoj.gov; Rick Crabtree/FPC Vice President and General Manager
Cc: Grace Chang / FPC Environmental Communications; Stephanie Schmidt/FTEHSF; Mary Bachynsky/FPC Environmental Dept.; Frey, Sarah; Barnett, Cheryl; Murdock, Russell; eecdcopy.enrd@usdoj.gov; ramiro.garcia@tceq.texas.gov; anna.treadwell@tceq.texas.gov; mary.smith@texasattorneygeneral.gov
Subject: RE: 3rd party LDAR Audit Point Comfort, TX- Proposed extension as a result of Covid-19

Good afternoon to all on this Friday afternoon!!

Hoping you are keeping well.

As promised, please find attached EPA's response to the referenced extension requests of March 2020.

I remain available if you have questions.

With kind regards,
Marcia

From: Thomas S. Andersen / FPC Environment
Sent: Tuesday, April 14, 2020 6:32 AM
To: Moncrieffe, Marcia ; Bob Stewart ; scott.cernich@usdoj.gov
Cc: Grace Chang / FPC Environmental Communications ; Stephanie Schmidt/FTEHSF ; Mary Bachynsky/FPC

Environmental Dept. ; Frey, Sarah ; Barnett, Cheryl ; Thomas S. Andersen / FPC Environment
Subject: RE: 3rd party LDAR Audit Point Comfort, TX- Proposed extension as a result of Covid-19

Marcia,

Thank you for the update. We look forward to US EPA's response later this week.

Regards,

Thomas S. Andersen
Formosa Plastics Corporation, U.S.A.
9 Peach Tree Hill Road
Livingston, NJ 07039
(w) 973.716.7257

From: Moncrieffe, Marcia [mailto:Moncrieffe.Marcia@epa.gov]
Sent: Monday, April 13, 2020 6:40 PM
To: Thomas S. Andersen / FPC Environment; Bob Stewart; scott.cernich@usdoj.gov
Cc: Grace Chang / FPC Environmental Communications; Stephanie Schmidt/FTEHSF; Mary Bachynsky/FPC Environmental Dept.; Frey, Sarah; Barnett, Cheryl
Subject: RE: 3rd party LDAR Audit Point Comfort, TX- Proposed extension as a result of Covid-19

Good afternoon to all,

To provide Formosa with an update to its response, I write to share that I expect to have the response to Formosa by the end of this week.

Thanks in advance,
Marcia

From: Thomas S. Andersen / FPC Environment <tandersen@fpcusa.com>
Sent: Friday, April 03, 2020 2:14 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Bob Stewart <bob.stewart@kellyhart.com>; scott.cernich@usdoj.gov
Cc: Grace Chang / FPC Environmental Communications <gchang2@fpcusa.com>; Stephanie Schmidt/FTEHSF <StephanieSchmidt@ftpc.fpcusa.com>; Mary Bachynsky/FPC Environmental Dept. <mbachynsky@fpcusa.com>; Frey, Sarah <frey.sarah@epa.gov>; Thomas S. Andersen / FPC Environment <tandersen@fpcusa.com>
Subject: RE: 3rd party LDAR Audit Point Comfort, TX- Proposed extension as a result of Covid-19

Hi Marcia,

I am not sure if you received Rick's email address. If not, please see below:

rickc@ftpc.fpcusa.com

If yes, sorry for the duplication. Have a nice weekend. Stay safe. And thanks again for all your help on this matter.

Thomas S. Andersen
Formosa Plastics Corporation, U.S.A.
9 Peach Tree Hill Road
Livingston, NJ 07039
(w) 973.716.7257

From: Moncrieffe, Marcia [mailto:Moncrieffe.Marcia@epa.gov]
Sent: Thursday, April 2, 2020 1:07 PM
To: Bob Stewart; Thomas S. Andersen / FPC Environment; scott.cernich@usdoj.gov
Cc: Grace Chang / FPC Environmental Communications; Stephanie Schmidt/FTEHSF; Mary Bachynsky/FPC Environmental Dept.; Frey, Sarah
Subject: RE: 3rd party LDAR Audit Point Comfort, TX- Proposed extension as a result of Covid-19

Good morning Bob,

I just realized that I do not have Rick's email and it is very likely that the response will be sent via email.

Please share with me Rick's email. Thanks Marcia

From: Bob Stewart <bob.stewart@kellyhart.com>
Sent: Wednesday, April 01, 2020 3:44 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Thomas S. Andersen / FPC Environment <tandersen@fpcusa.com>; scott.cernich@usdoj.gov
Cc: Grace Chang / FPC Environmental Communications <gchang2@fpcusa.com>; Stephanie Schmidt/FTEHSF <StephanieSchmidt@ftpc.fpcusa.com>; Mary Bachynsky/FPC Environmental Dept. <mbachynsky@fpcusa.com>; Frey, Sarah <frey.sarah@epa.gov>
Subject: RE: 3rd party LDAR Audit Point Comfort, TX- Proposed extension as a result of Covid-19

Hope you are well, Marcia. Please address to Rick Crabtree, VP and GM at FPC Point Comfort. My address is still Kelly Hart at 303 Colorado Ave Suite 2000, Austin, TX78701. Bob

---
Sent from Workspace ONE Boxer

On April 1, 2020 at 2:53:58 PM CDT, Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov> wrote:

> Good afternoon Bob,
>
> It has been sometime since we have spoken- hoping this email finds you doing well.
>
> Please share with me you mailing address.
> Also for your information, it is likely that EPA's response will be provided via email.

In addition to addressing the response to you, should EPA address its letter response to Formosa's Point Comfort VP/General Manager or should the letter be addressed to you and Tom?

Thank you in advance?
Marcia

From: Thomas S. Andersen / FPC Environment <tandersen@fpcusa.com>
Sent: Tuesday, March 31, 2020 2:47 PM
To: scott.cernich@usdoj.gov; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Grace Chang / FPC Environmental Communications <gchang2@fpcusa.com>; Stephanie Schmidt/FTEHSF <StephanieSchmidt@ftpc.fpcusa.com>; Thomas S. Andersen / FPC Environment <tandersen@fpcusa.com>; Mary Bachynsky/FPC Environmental Dept. <mbachynsky@fpcusa.com>; Bob Stewart - Kelly Hart (bob.stewart@kellyhart.com) <bob.stewart@kellyhart.com>; Frey, Sarah <frey.sarah@epa.gov>
Subject: 3rd party LDAR Audit Point Comfort, TX- Proposed extension as a result of Covid-19
Importance: High

Ms. Moncrieffe and Mr. Cernich,

RE: Civil Action No.6:09-cv-00061 (Consent Decree)

United States v. Formosa Plastics Corporation, Texas, et. al.

Appendix A – Subsection J, Paragraph 26

3rd Party Leak Detection and Repair Audit (LDAR) – 2 year cycle

In light of the recent development this past weekend, in which President Trump extended restrictive social distance guidelines through the end of April, Formosa Plastics Corporation, U.S.A. (Formosa) appreciates the opportunity to propose an additional extension for our scheduled 3rd party LDAR audit. Formosa is requesting your permission to postpone the audit to begin no later than the end of the second quarter 2020, assuming restrictions are lifted by then.

Again, we appreciate your consideration of our request. Please let me know if you have any questions or would like to discuss further.

Sincerely,

Thomas S. Andersen
Formosa Plastics Corporation, U.S.A.
9 Peach Tree Hill Road
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(w) 973.716.7257

This communication is solely for use by the intended recipient and may contain information that is privileged, confidential or copyrighted under applicable law. If you are not the intended recipient, you are hereby formally notified that any use, copying or distribution of this communication, in whole or in part, is strictly prohibited. Unless explicitly stated, this communication does not constitute a contract offer, a contract amendment, or an acceptance of a contract offer. This communication also does not constitute consent to the use of sender's contact information for direct marketing purposes or for transfers of data to third parties.

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Sent: 5/11/2020 7:34:17 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]
CC: Grace Chang / FPC Environmental Communications [gchang2@fpcusa.com]; Stephanie Schmidt/FTEHSF [StephanieSchmidt@ftpc.fpcusa.com]; Mary Bachynsky/FPC Environmental Dept. [mbachynsky@fpcusa.com]; Frey, Sarah [frey.sarah@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; eecdcopy.enrd@usdoj.gov; ramiro.garcia@tceq.texas.gov; anna.treadwell@tceq.texas.gov; mary.smith@texasattorneygeneral.gov; Rick Crabtree/FPC Vice President and General Manager [RickC@ftpc.fpcusa.com]; scott.cernich@usdoj.gov; Bob Stewart - Kelly Hart (bob.stewart@kellyhart.com) [bob.stewart@kellyhart.com]
Subject: RE: 3rd party LDAR Audit Point Comfort, TX- Proposed extension as a result of Covid-19
Attachments: ATT00001.txt; USEPA LDAR Response.pdf

Hi Marcia,

I hope this note finds you well. Attached is our response to your request regarding rescheduling the consent decree LDAR audit. Please let me know if you would like to discuss further.

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Formosa Plastics Corporation, U.S.A.
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To: scott.cernich@usdoj.gov; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Grace Chang / FPC Environmental Communications <gchang2@fpcusa.com>; Stephanie Schmidt/FTEHSF <StephanieSchmidt@ftpc.fpcusa.com>; Thomas S. Andersen / FPC Environment <tandersen@fpcusa.com>; Mary Bachynsky/FPC Environmental Dept. <mbachynsky@fpcusa.com>; Bob Stewart - Kelly Hart (bob.stewart@kellyhart.com) <bob.stewart@kellyhart.com>; Frey, Sarah <frey.sarah@epa.gov>
Subject: 3rd party LDAR Audit Point Comfort, TX- Proposed extension as a result of Covid-19
Importance: High

Ms. Moncrieffe and Mr. Cernich,

RE: Civil Action No.6:09-cv-00061 (Consent Decree)

United States v. Formosa Plastics Corporation, Texas, et. al.

Appendix A – Subsection J, Paragraph 26

3rd Party Leak Detection and Repair Audit (LDAR) – 2 year cycle

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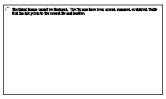
Again, we appreciate your consideration of our request. Please let me know if you have any questions or would like to discuss further.

Sincerely,



Thomas S. Andersen
Formosa Plastics Corporation, U.S.A.
9 Peach Tree Hill Road
Livingston, NJ 07039
(w) 973.716.7257

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offer. This communication also does not constitute consent to the use of sender's contact information for direct marketing purposes or for transfers of data to third parties.

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Formosa Plastics

Formosa Plastics Corporation, Texas
201 Formosa Drive • P.O. Box 700
Point Comfort, TX 77978
Telephone: 361-987-7000

May 11, 2020

Via Email

Cheryl T. Seager
Director
Enforcement and Compliance Assurance Division
US EPA, Region 6
1201 Elm Street, Suite 500
Dallas, TX 75270

RE: Force Majeure Updated Notification Related to COVID-19 Pandemic
Formosa Plastics Corporation/Point Comfort Plastic Chemical Plant, TX
United States v Formosa Plastic Corporation Texas, *et al.*
Southern District of Texas - Civil Action No. 6:09-cv-00061
"Formosa Consent Decree"

Dear Ms. Seager:

We are in receipt of your response letter dated April 17, 2020, regarding our request to extend the date to begin the 3rd party Consent Decree Leak Detection and Repair (LDAR) Audit. With this letter, we are responding to your request to provide the measures that Formosa has taken or will take during this period to minimize the impact of the noncompliance.

Formosa has taken, or will take, the following measures to minimize the impact of the noncompliance:

- Monitoring news and information regarding the COVID-19 pandemic made available through public media outlets (Internet and TV) and trade associations (Texas Chemical Council and American Fuel and Petrochemical Manufacturers) regarding updates to the state of the pandemic and its impact to the policies and orders issued at the federal, state and local levels.
- Maintaining our contract with Montrose Environmental (Montrose) who has been hired to perform the 3rd party LDAR audit. We maintain open communications with Montrose as to their availability to conduct the audit based on the status of personnel and restrictions imposed by COVID-19 government orders, business travel policies, and Formosa's internal procedures.
- Maintaining an open and continual dialogue with you, Ms. Seager, as to the current state of affairs on the pandemic situation.

We have continued standard LDAR monitoring throughout the facility during the pandemic. All units have also continued to perform audio, visual, and olfactory (AVO) inspections as part of normal operator tasks that are performed by each shift in all of the operating units.

Formosa Plastics

Formosa Plastics Corporation, Texas
201 Formosa Drive • P.O. Box 700
Point Comfort, TX 77978
Telephone: 361-987-7000

If we feel that we can complete the audit in a timelier manner based on developments in the pandemic situation, we will contact the US EPA verbally initially and will follow-up that communication in writing shortly thereafter. We appreciate your help and assistance in this matter.

If you have any questions or would like to discuss further, please contact Thomas Andersen at tandersen@fpcusa.com or Bob Stewart at your earliest convenience.

Sincerely,

Rick Crabtree
Vice President/General Manager
Formosa Plastics Corporation, Texas

Message

From: Ramiro Garcia [ramiro.garcia@tceq.texas.gov]
Sent: 4/2/2020 4:25:39 PM
To: Darcey, Larry [LDarcey@marathonpetroleum.com]; OCE [OCE@tceq.texas.gov]
CC: Palmer, Todd B. [tbpalmer@marathonpetroleum.com]; Clingan, Mark A. [maclingan@marathonpetroleum.com]; Sweeley, Brian J. [bjsweeley@marathonpetroleum.com]; Long, Glenn L. [gllong@marathonpetroleum.com]; Harrell, Ellen M. [ElHarrell@marathonpetroleum.com]; Davis, Erica F. [efdavis@marathonpetroleum.com]; Kaysen, Eric R. [ErKaysen@marathonpetroleum.com]; Cade, Ruth A. [racade@marathonpetroleum.com]; Bogard, Kevin D. [kdbogard@marathonpetroleum.com]; Meeks, Von J. [vjmeeks@marathonpetroleum.com]; TCEQR12AIR [TCEQR12AIR@tceq.texas.gov]; Jonathan Walling [jonathan.walling@tceq.texas.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]; EXECDIR [EXECDIR@tceq.texas.gov]; rschultz@gchd.org; Tracy Miller [tracy.miller@tceq.texas.gov]; Susan Johnson [susan.johnson@tceq.texas.gov]; Jayme Sadlier [jayme.sadlier@tceq.texas.gov]; Jonathan Walling [jonathan.walling@tceq.texas.gov]
Subject: RE: MPC Request #2 related to COVID-19 Response - Blanchard GBR

Hello Mr. Darcey,

This email confirms receipt of your correspondence. We are reviewing your request and expect to have a response soon.

Best regards,

Ramiro Garcia, Jr.
Deputy
Office of Compliance & Enforcement
TCEQ

From: Darcey, Larry <LDarcey@marathonpetroleum.com>
Sent: Thursday, April 2, 2020 11:19 AM
To: Ramiro Garcia <ramiro.garcia@tceq.texas.gov>; OCE <OCE@tceq.texas.gov>
Cc: Palmer, Todd B. <tbpalmer@marathonpetroleum.com>; Clingan, Mark A. <maclingan@marathonpetroleum.com>; Sweeley, Brian J. <bjsweeley@marathonpetroleum.com>; Long, Glenn L. <gllong@marathonpetroleum.com>; Harrell, Ellen M. <ElHarrell@marathonpetroleum.com>; Davis, Erica F. <efdavis@marathonpetroleum.com>; Kaysen, Eric R. <ErKaysen@marathonpetroleum.com>; Cade, Ruth A. <racade@marathonpetroleum.com>; Bogard, Kevin D. <kdbogard@marathonpetroleum.com>; Meeks, Von J. <vjmeeks@marathonpetroleum.com>; TCEQR12AIR <TCEQR12AIR@tceq.texas.gov>; Jonathan Walling <jonathan.walling@tceq.texas.gov>; Seager.cheryl@Epa.gov; Kelley.rosemarie@epa.gov; EXECDIR <EXECDIR@tceq.texas.gov>; rschultz@gchd.org
Subject: MPC Request #2 related to COVID-19 Response - Blanchard GBR
Importance: High

Mr. Garcia,

Please find the following enforcement discretion requests for the Blanchard Refining Company LLC (Blanchard) Galveston Bay Refinery (GBR) and those compliance activities for which enforcement discretion is requested from March 19, 2020 to May 7, 2020. These requests are submitted to clarify TCEQ March 28, 2020 email approval of Blanchard's March 27, 2020 request.

Request #1: Blanchard is requesting enforcement discretion to defer repair timelines related to LDAR, Benzene Waste Operations NESHAP (BWON), NSPS QQQ leaks or inspection failures.

Request #2: Blanchard is requesting enforcement discretion to defer visual leak inspections pursuant to BWON and NSPS QQQ and other LDAR-type regulations and permit conditions.

Reason for Requests #1 & #2: In response to the pandemic, Blanchard is limiting access to the site to reduce the risk of spreading the virus to employees in the refinery and the public at large. These visual inspections are performed by our third-party contractor who also performs LDAR services. In addition to requiring non-essential employees to telecommute during this period, the site has gone to a critical-employee only on-site workforce. Thus, Blanchard is unable to have a full force of third-party contractors available to perform visual inspection tasks. Notably, Blanchard's third-party contractors work in close quarters in the "LDAR Building" which houses close to 50 technicians. These technicians not only share workspaces, but also equipment for monitoring and calibration and thus, this building & shared equipment does not meet obligations for at least 6 ft social distancing and disinfection requirements to minimize the potential spread of COVID-19. Further LDAR technicians travel from operations control room to control room to get hot work permits necessary to conduct monitoring; this creates a vector across multiple process units.

Duration: Through May 7, 2020. Marathon may later be forced to request an extension to this duration should it be necessary due to the status of the pandemic.

Rule Citation/Permit Condition: 40 CFR 60 Subparts GGG, GGGa, VV, VVa, QQQ, 40 CFR 61 subpart BB, 40 CFR 61 subpart FF, 40 CFR 63 subpart H, 40 CFR 63 subpart CC, 30.TAC Chapter 115, Subchapter D & H, Permit 9606 SC 11, Permit 2231 SC 6 and 29, Permit 47256 SC 51, Permit 2315 SC 10, Permit 22107 SC 31, Permit 46052 SC 11, Permit 19599 SC 9, Permit 22443 SC 10, Permit 2612 SC 15 and Permit 6488 SC 11 and Title V Permit Nos. O-1380 Bay Plant and O-1541 GBR

Mitigation Measures: GBR will use perimeter optical gas imaging to identify leaks, but that would not meet the rigor of the traditional visual inspection routinely performed. We will be prioritizing leaks observed and repair as soon as staffing allows, but lack of available specialty contractors and maintenance personnel may cause delays in certain repairs (i.e., initial attempt not completed in 5-days or final repair within 15-days.) Please confirm that enforcement discretion is also approved for those repair timelines.

Thank you for your time and consideration with this matter. If you have any questions or comments please feel free to contact me at (409) 502-9009 or ldarcey@marathonpetroleum.com.

Sincerely,

Larry G. Darcey, P.E.
Environmental Supervisor
Marathon Petroleum Company

2401 5th Avenue South
Texas City, Texas 77590
Office: 409-943-7497
Cell: 409-502-9009
Email: ldarcey@marathonpetroleum.com

Message

From: Darcey, Larry [LDarcey@marathonpetroleum.com]
Sent: 4/2/2020 4:19:18 PM
To: ramiro.garcia@tceq.texas.gov; OCE [OCE@tceq.texas.gov]
CC: Palmer, Todd B. [tbpalmer@marathonpetroleum.com]; Clingan, Mark A. [maclingan@marathonpetroleum.com]; Sweeley, Brian J. [bjsweeley@marathonpetroleum.com]; Long, Glenn L. [gllong@marathonpetroleum.com]; Harrell, Ellen M. [ElHarrell@marathonpetroleum.com]; Davis, Erica F. [efdavis@marathonpetroleum.com]; Kaysen, Eric R. [ErKaysen@marathonpetroleum.com]; Cade, Ruth A. [racade@marathonpetroleum.com]; Bogard, Kevin D. [kdbogard@marathonpetroleum.com]; Meeks, Von J. [vjmeeks@marathonpetroleum.com]; TCEQR12AIR@tceq.texas.gov; Jonathan Walling [jonathan.walling@tceq.texas.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]; execdir@tceq.texas.gov; rschultz@gchd.org
Subject: MPC Request #2 related to COVID-19 Response - Blanchard GBR

Importance: High

Mr. Garcia,

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Duration: Through May 7, 2020. Marathon may later be forced to request an extension to this duration should it be necessary due to the status of the pandemic.

Rule Citation/Permit Condition: 40 CFR 60 Subparts GGG, GGGa, VV, VVa, QQQ, 40 CFR 61 subpart BB, 40 CFR 61 subpart FF, 40 CFR 63 subpart H, 40 CFR 63 subpart CC, 30.TAC Chapter 115, Subchapter D & H, Permit 9606 SC 11, Permit 2231 SC 6 and 29, Permit 47256 SC 51, Permit 2315 SC 10, Permit 22107 SC 31, Permit 46052 SC 11, Permit 19599 SC 9, Permit 22443 SC 10, Permit 2612 SC 15 and Permit 6488 SC 11 and Title V Permit Nos. O-1380 Bay Plant and O-1541 GBR

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Thank you for your time and consideration with this matter. If you have any questions or comments please feel free to contact me at (409) 502-9009 or ldarcey@marathonpetroleum.com.

Sincerely,

Larry G. Darcey, P.E.
Environmental Supervisor
Marathon Petroleum Company

2401 5th Avenue South
Texas City, Texas 77590
Office: 409-943-7497
Cell: 409-502-9009
Email: ldarcey@marathonpetroleum.com

Message

From: Jayme Sadlier [jayme.sadlier@tceq.texas.gov]
Sent: 3/31/2020 9:00:21 PM
To: ElHarrell@marathonpetroleum.com
CC: tbpalmer@marathonpetroleum.com; LDarcey@marathonpetroleum.com; Ramiro Garcia [ramiro.garcia@tceq.texas.gov]; TCEQR12AIR [TCEQR12AIR@tceq.texas.gov]; Jonathan Walling [jonathan.walling@tceq.texas.gov]; Cynthia Gandee [cynthia.gandee@tceq.texas.gov]; Susan Johnson [susan.johnson@tceq.texas.gov]; Tracy Miller [tracy.miller@tceq.texas.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]
Subject: Fw: Blanchard Refining Company LLC, Galveston Bay Refinery - Benzene Waste Operations NESHAP 2019 (BWON) Annual Report
Attachments: 2019 BWON Galveston Bay Refinery Annual Report.pdf

Ms. Harrell,

During the COVID-19 pandemic, the TCEQ is accepting electronic versions of documents if a customer is unable to mail or otherwise deliver a hard copy document, as required by permit/rule/statute. Dedicated email addresses, by TCEQ Region, have also been set-up for receiving the documents <35MB in size during the pandemic. The TCEQ Houston Region email (TCEQR12AIR@tceq.texas.gov) has been cc:ed on this email, so please consider the attached report received by the TCEQ Houston region.

The TCEQ-region specific email addresses will be posted on the TCEQ public website soon. In the meantime, if you have additional air program documents for the Galveston County facility that you are unable to provide as a hard copy, please utilize the TCEQR12AIR address and provide a brief summary within the body of your email describing the COVID-19 circumstance preventing the hard copy submittal. If you have an electronic document >35MB, please send an email to TCEQR12AIR to request a file transfer protocol. Please only use this email address if you are unable to provide the submittal via postal mail.

Once the COVID-19 pandemic has ended, please resume providing hard copies with original signatures, if required. You do not need resubmit, by hard copy, the underlying report/data already electronically-submitted during the pandemic timeframe.

Thank you,
Jayme Sadlier, Special Assistant
TCEQ Office of Compliance and Enforcement

From: Harrell, Ellen M. <ElHarrell@marathonpetroleum.com>
Sent: Monday, March 30, 2020 8:05 PM
To: Seager.cheryl@Epa.gov; Kelley.rosemarie@epa.gov; OCE <OCE@tceq.texas.gov>; Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Cc: Palmer, Todd B. <tbpalmer@marathonpetroleum.com>; Darcey, Larry <LDarcey@marathonpetroleum.com>
Subject: Blanchard Refining Company LLC, Galveston Bay Refinery - Benzene Waste Operations NESHAP 2019 (BWON) Annual Report

To Whom it May Concern,

The attached report is the Benzene Waste Operations NESHAP 2019 (BWON) Annual Report for the Blanchard Refining Company LLC, Galveston Bay Refinery. Due to COVID-19 this report is being sent electronically. If there are any

questions or comments regarding this correspondence, please contact myself (Ellen Harrell) at elharrell@marathonpetroleum.com.

Thank you,
Ellen

Ellen Harrell
HES Professional
Refining Environmental
Marathon Petroleum Company LP
Office: 409-942-4059 Cell: 419-619-8437
Email: elharrell@marathonpetroleum.com

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Kevin D. Bogard
Vice President
Galveston Bay Refinery

Blanchard Refining Company LLC
A subsidiary of Marathon Petroleum Company LP

P. O. Box 401
2401 5th Avenue South
Texas City, TX 77592
Tel: 409.945.1011
Fax: 409.941.8292

March 30, 2020

ELECTRONICALLY SENT
U.S. Environmental Protection Agency, Region VI
Compliance Assurance & Enforcement Division
ATTN: Director (6EN)
1201 Elm Street, Suite 500
Dallas, TX 75270

ELECTRONICALLY SENT
U.S. Environmental Protection Agency
Regulatory Enforcement Division, MC 2242-A
ATTN: Director
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington DC 20460

ELECTRONICALLY SENT
Texas Commission on Environmental Quality
ATTN: Executive Director
P. O. Box 13087, MC-109
Austin, TX 78711-3087

RE: <u>Benzene Waste Operations NESHAP 2019 (BWON) Annual Report</u>
NESHAPs Subpart FF – Title 40 CFR 61.357(d)(2), (5) and (8)
United States, et.al.v. BP Exploration & Oil, et.al.
Civil Action No. 2:96 CV 095 RL and the Sixth Amendment (CD)
Blanchard Refining Company LLC, Galveston Bay Refinery
TCEQ Air Account No.: GB-0004-L; Regulated Entity No. 102-535-077

To Whom It May Concern:

The correspondence herein fulfills the annual reporting requirements promulgated under 40 CFR §61.357(d)(2), (5) and (8) and Paragraph 19.A.iii of the above reference consent decree covering the period of January 1, 2019 through December 31, 2019 for the Blanchard Refining Company LLC, Galveston Bay Refinery (GBR) located at 2401 5th Avenue South, Texas City, TX 77592. Since January 1, 2008, the GBR has utilized the 6 Mg benzene quantity compliance option (6 BQ compliance option) under §61.342(e).
The information required for this annual report is contained in Attachment 1 to this transmittal. Attachment 1 provides the Benzene Waste Operations NESHAP (BWON) annual report, which includes Tables 1 and 2. Table 1 includes the Total Annual Benzene Quantity (TAB) for GBR and

identifies the total annual benzene quantity in uncontrolled wastes under the 6 BQ compliance option. Table 2 is the BWON Inspection and Monitoring Exceptions annual summary as required under 40 CFR §61.357(d)(8).

The 2019 GBR TAB was estimated to be **611 mega grams per year (Mg/yr)** and the total uncontrolled benzene quantity for 2019 under the 6 BQ compliance option was estimated to be **2.84 Mg/yr**.

If there are any questions or comments regarding this correspondence, please contact Ellen Harrell at 409-942-4059 or at elharrell@marathonpetroleum.com.

Sincerely,

Kevin D. Bogard
Vice President
Blanchard Refining Company LLC

ED/dm
Attachment 1 – Benzene Waste Operations NESHAP Annual Report (2019)

Attachment 1

Benzene Waste Operations NESHAP Annual Report

40 CFR 61 Subpart FF Annual Reporting Requirements

This report fulfills the annual reporting requirements contained in 40 CFR 61, Subpart FF (BWON) for the Blanchard Refining Company Galveston Bay Refinery (GBR) East/West Plant. This report is formatted such that each of the potential annual reporting requirements in the rule is identified and compliance or applicability of each is discussed.

SECTION 1.0 GENERAL APPLICABILITY

Applicability §61.340(a):
The provisions of this subpart apply to owners or operators of chemical manufacturing plants, coke by-product recovery plants and petroleum refineries.

GBR is subject to § 61.340 because it is a petroleum refinery and; therefore, is subject to the reporting requirements in §61.357. This report fulfills the reporting requirements under § 61.357(d)(2), (5) and (8).

SECTION 2.0 REPORTING REQUIREMENTS

Total Annual Benzene Quantity (TAB) Reporting - § 61.357(d)(2):
…the owner or operator shall submit annually to the Administrator a report that updates the information listed in paragraphs (a)(1) through (a)(3) of this section. If the information in the annual report required by paragraphs (a)(1) through (a)(3) of this section is not changed in the following year, the owner or operator may submit a statement to that effect.

Table 1 of this attachment is an update to the information listed in § 61.357(a)(1) through (a)(3).

2 Mg/yr Compliance Option (2 BQ) Reporting - § 61.357(d)(3):
If an owner or operator elects to comply with the requirements of § 61.342(c)(3)(ii) [2 Mg compliance option], then the report required by paragraph (d)(2) of this section shall include a table identifying each waste stream chosen for exemption and the total annual benzene quantity in these exempted streams.

N/A. GBR has elected to comply with the provisions of § 61.342(e). Therefore reporting under § 61.357(d)(3) is not required.

1 Mg/yr Process Wastewater Reporting - § 61.357(d)(4):
If an owner or operator elects to comply with the requirements of § 61.342(d) [1 Mg/yr process wastewater compliance option], then the report required by paragraph (d)(2) of this section shall present the following information for each process wastewater stream: . . .

N/A. GBR has elected to comply with the provisions of § 61.342(e). Therefore, reporting under § 61.357(d)(4) is not required.

6 Mg/yr Treat to Target (6 BQ) Reporting - § 61.357(d)(5):
If an owner or operator elects to comply with the requirements of § 61.342(e) [6 Mg/yr treat to target compliance option], then the report required by paragraph (d)(2) of this section shall include a table presenting the following information for each waste stream: . . .

Included in Table 1 is the uncontrolled benzene quantity calculated in accordance with the methodology presented in §61.355(k).

Annual Inspection Reporting - § 61.357(d)(8):
…the owner or operator shall submit annually to the Administrator a report that summarizes all inspections required by § 61.342 through 61.354 during which detectable emissions are measured or a problem (such as a broken seal, gap or other problem) that could result in benzene emissions is identified, including information about repairs or corrective action taken.

Table 2 of this attachment contains a summary of the inspections performed during 2019 pursuant to § 61.342 through 61.354 for which detectable emissions or problems were identified including the repairs or corrective actions taken.

Table 1

Total Annual Benzene Quantity (TAB)
[§61.357(d)(2)]
&
Uncontrolled Benzene Quantity Per
§61.342(e) (6 BQ)
[§61.357(d)(5)]

Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit (Show A)	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
AC Exchangers	AC Exchangers	Uncontrolled AC Exchanger Maintenance	Uncontrolled AC Exchanger Maintenance Wastes		X				X				X	0	0
AC Exchangers TAR	AC Exchangers TAR	Controlled AC Exchanger Maintenance	Controlled AC Exchanger Maintenance	X					X				X	0	156
AC Exchangers TAR	AC Exchangers TAR	Uncontrolled AC Exchanger Maintenance	Uncontrolled AC Exchanger Maintenance Wastes		X				X				X	0	156
Alky 2	C-401	Extractor	Extractor Merox Spent Caustic to 329-F at Pipestills en route to Regeneration	X		X							X	51,954	367
Alky 2	C-452	PP Extractor	PP Extractor Spent Caustic to Rich Caustic Tank	X			X						X	328,368	2,322
Alky 2	CT-1 through CT-6	Alky 2 Cooling Tower	Alky 2 Cooling Tower Blowdown to Oily Water Sewer		X		X						X	356,229,836	0
Alky 2	V-101	Butane Splitter Accumulator	Butane Splitter Accumulator Water Draw to Oily Water Sewer		X		X						X	12,314	75

NOTE: Each line item is split across two pages.

Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
AC Exchangers	AC Exchangers	Uncontrolled AC Exchanger Maintenance	Uncontrolled AC Exchanger Maintenance Wastes	0.00	0.00	0.00	0.0000	50.00	44,500	0	0.0000	0	0	0.000	0.0000
AC Exchangers TAR	AC Exchangers TAR	Controlled AC Exchanger Maintenance	Controlled AC Exchanger Maintenance	0.00	0.00	0.00	0.0000	0.00	44,500	590	0.0923	0	590	0.092	0.0000
AC Exchangers TAR	AC Exchangers TAR	Uncontrolled AC Exchanger Maintenance	Uncontrolled AC Exchanger Maintenance Wastes	0.00	0.00	0.00	0.0000	50.00	44,500	7	0.0011	0	7	0.001	0.0011
Alky 2	C-401	Extractor	Extractor Merox Spent Caustic to 329-F at Pipestills en route to Regeneration	0.05	0.15	0.10	0.0000	5.00	15.00	10.00	0.0000	52	0	0.000	0.0000
Alky 2	C-452	PP Extractor	PP Extractor Spent Caustic to Rich Caustic Tank	0.05	0.15	0.10	0.0000	5.00	15.00	10.00	0.0000	331	0	0.000	0.0000
Alky 2	CT-1 through CT-6	Alky 2 Cooling Tower	Alky 2 Cooling Tower Blowdown to Oily Water Sewer	0.00	0.00	0.00	0.0004	0.00	0.00	0.00	0.0000	356,230	0	0.000	0.0004
Alky 2	V-101	Butane Splitter Accumulator	Butane Splitter Accumulator Water Draw to Oily Water Sewer	7.50	12.50	10.00	0.0001	3267.00	3993.00	3630.00	0.0003	12	32	0.000	0.0004

NOTE: Each line item is split across two pages.

Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
Alky 2	V-102	Reformer Butane Splitter Accumulator	Reformer Butane Splitter Accumulator Water Draw to Oily Water Sewer		X		X						X	585	4
Alky 2	V-401	Caustic Prewash	Caustic Prewash Vessel Spent Caustic to Caustic Setting Drum (301-F) at Pipestill 3A in route to Deep Wells	X			X						X	264,294	1,869
Alky 2	V-402	Caustic Settler	Caustic Settler Merox Spent Caustic to 329-F at Pipestills en route to Regeneration	X			X						X	129,504	916
Alky 2	V-403	Sand Coalescer	Sand Coalescer Drain to 329-F at Pipestill 3A for Regeneration	X			X						X	472	3
Alky 2	V-452	PP Caustic Prewash	PP Caustic Prewash to Caustic Settling Drum in route to Deep Wells	X			X						X	732,976	5,183
Alky 2	V-453	PP Caustic Settler	PP Caustic Settler Spent Caustic to Rich Caustic Tank	X			X						X	76,117	538
Alky 2	V-454	PP Sand Coalescer	Sand Coalescer Drain to Rich Caustic Tank	X			X						X	472	3

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
Alky 2	V-102	Reformer Butane Splitter Accumulator	Reformer Butane Splitter Accumulator Water Draw to Oily Water Sewer	7.50	12.50	10.00	0.0000	3267.00	3993.00	3630.00	0.0000	1	32	0.000	0.0000
Alky 2	V-401	Caustic Prewash	Caustic Prewash Vessel Spent Caustic to Caustic Setting Drum (301-F) at Pipestill 3A in route to Deep Wells	0.05	0.15	0.10	0.0000	5.00	15.00	10.00	0.0000	266	0	0.000	0.0000
Alky 2	V-402	Caustic Settler	Caustic Settler Merox Spent Caustic to 329-F at Pipestills en route to Regeneration	0.05	0.15	0.10	0.0000	5.00	15.00	10.00	0.0000	130	0	0.000	0.0000
Alky 2	V-403	Sand Coalescer	Sand Coalescer Drain to 329-F at Pipestill 3A for Regeneration	7.50	12.50	10.00	0.0000	3267.00	3993.00	3630.00	0.0000	0	32	0.000	0.0000
Alky 2	V-452	PP Caustic Prewash	PP Caustic Prewash to Caustic Settling Drum in route to Deep Wells	0.05	0.15	0.10	0.0001	5.00	15.00	10.00	0.0001	738	0	0.000	0.0000
Alky 2	V-453	PP Caustic Settler	PP Caustic Settler Spent Caustic to Rich Caustic Tank	0.05	0.15	0.10	0.0000	5.00	15.00	10.00	0.0000	77	0	0.000	0.0000
Alky 2	V-454	PP Sand Coalescer	Sand Coalescer Drain to Rich Caustic Tank	0.05	0.15	0.10	0.0000	5.00	15.00	10.00	0.0000	0	0	0.000	0.0000

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General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
Alky 2	V-601	Splitter Reflux Drum	Splitter Reflux Drum Water Draw to Oily Water Sewer		X		X						X	12,314	75
Alky 2	V-602	Debutanizer Reflux Drum	Debutanizer Reflux Drum Water Draw to Oily Water Sewer		X		X						X	585	4
Alky 3	CT-1001	Cooling Tower	Cooling Tower Blowdowns		X	X							X	336,328,728	0
Alky 3	CT-1002	Cooling Tower	Cooling Tower Blowdowns		X	X							X	45,772,549	0
Alky 3	ME-1003	Oil Mist Generator Filters	Oil Mist Generator Filters Cleanout to Oily Water Sewer		X				X				X	0	2
Alky 3	ME-1020	Oil Mist Generator Filters	Oil Mist Generator Filters Cleanout to Oily Water Sewer		X				X				X	0	2

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General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
Alky 2	V-601	Splitter Reflux Drum	Splitter Reflux Drum Water Draw to Oily Water Sewer	7.50	12.50	10.00	0.0001	3267.00	3993.00	3630.00	0.0003	12	32	0.000	0.0004
Alky 2	V-602	Debutanizer Reflux Drum	Debutanizer Reflux Drum Water Draw to Oily Water Sewer	7.50	12.50	10.00	0.0000	3267.00	3993.00	3630.00	0.0000	1	32	0.000	0.0000
Alky 3	CT-1001	Cooling Tower	Cooling Tower Blowdowns	0.00	0.00	0.00	0.0003	0.00	0.00	0.00	0.00000	336,329	0	0.000	0.0003
Alky 3	CT-1002	Cooling Tower	Cooling Tower Blowdowns	0.00	0.00	0.00	0.00005	0.00	0.00	0.00	0.00000	45,773	0	0.000	0.00005
Alky 3	ME-1003	Oil Mist Generator Filters	Oil Mist Generator Filters Cleanout to Oily Water Sewer	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
Alky 3	ME-1020	Oil Mist Generator Filters	Oil Mist Generator Filters Cleanout to Oily Water Sewer	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000

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General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
Alky 3	ME-1023	Oil Mist Generator Filters	Oil Mist Generator Filters Cleanout to Oily Water Sewer		X				X				X	0	2
Alky 3	V-1001	Deethanizer Overhead Accumulator	Deethanizer Overhead Accumulator Drain to Flare KO Drum	X			X						X	3.03	8.48
Alky 3	V-1002A/B/C	Feed Driers	Feed Drier Drains to Flare KO Drum	X			X						X	34,537	493
Alky 3	V-1003	Regeneration Coalescer	Regeneration Coalescer Drain to Flare KO Drum	X			X						X	33,396	477
Alky 3	V-1010	Old Butane/Propane KOH Treater	Old Butane/Propane KOH Treater (Empty KO Drum) to Oily Water Sewer		X		X						X	2,736	19.35

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
Alky 3	ME-1023	Oil Mist Generator Filters	Oil Mist Generator Filters Cleanout to Oily Water Sewer	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
Alky 3	V-1001	Deethanizer Overhead Accumulator	Deethanizer Overhead Accumulator Drain to Flare KO Drum	0.05	0.15	0.10	0.0000	5.00	15.00	10.00	0.0000	0	7	0.000	0.0000
Alky 3	V-1002A/B/C	Feed Driers	Feed Drier Drains to Flare KO Drum	0.05	0.15	0.10	0.0000	5.00	15.00	10.00	0.0000	35	0	0.000	0.0000
Alky 3	V-1003	Regeneration Coalescer	Regeneration Coalescer Drain to Flare KO Drum	0.05	0.15	0.10	0.0000	5.00	15.00	10.00	0.0000	34	0	0.000	0.0000
Alky 3	V-1010	Old Butane/Propane KOH Treater	Old Butane/Propane KOH Treater (Empty KO Drum) to Oily Water Sewer	0.05	0.15	0.10	0.0000	5.00	15.00	10.00	0.0000	3	0	0.000	0.0000

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
Alky 3	V-1013	Fuel Gas KO Drum	Fuel Gas KO Drum Drain to Flare KO Drum	X			X						X	98.45	68.91
Alky 3	V-1014	Acid Relief Neutralizer (ARN)	Acid Relief Neutralizer (ARN) Spent KOH to Spent KOH Tank		X		X						X	149,477	3,051
Alky 3	V-1015	Flare KO Drum	Flare KO Drum Drain to Refinery Sewer		X		X						X	91,646	1,309
Alky 3	V-1017	Depropanizer Reboiler Condensate Drum	Depropanizer Reboiler Condensate Drum Drain to Oily Water Sewer		X	X							X	0	0

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General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
Alky 3	V-1013	Fuel Gas KO Drum	Fuel Gas KO Drum Drain to Flare KO Drum	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	0	9	0.000	0.0000
Alky 3	V-1014	Acid Relief Neutralizer (ARN)	Acid Relief Neutralizer (ARN) Spent KOH to Spent KOH Tank	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	153	0	0.000	0.0000
Alky 3	V-1015	Flare KO Drum	Flare KO Drum Drain to Refinery Sewer	0.05	0.15	0.10	0.0000	5.00	15.00	10.00	0.0000	93	0	0.000	0.0000
Alky 3	V-1017	Depropanizer Reboiler Condensate Drum	Depropanizer Reboiler Condensate Drum Drain to Oily Water Sewer	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	0	0	0.000	0.0000

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General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
Alky 3	V-1024	ASO Caustic Wash Drum	ASO Caustic Wash Drum to Spent KOH Tank		X		X						X	2,695,552	83,368
Alky 3	V-1027	Deethanizer Water Draw Drum	Deethanizer Water Draw Drum Drain to Flare KO Drum	X			X						X	276	1,741
Alky 3	V-1055	Propane KOH Treater	Propane KOH Treater to Spent KOH Tank		X		X						X	54,781	6,087
Alky 3	V-1061	Debutanizer Overhead Accumulator	Debutanizer Overhead Accumulator Drain to Spent KOH Tank		X	X							X	4,925,524	49,753

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General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
Alky 3	V-1024	ASO Caustic Wash Drum	ASO Caustic Wash Drum to Spent KOH Tank	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	2,779	0	0.000	0.0000
Alky 3	V-1027	Deethanizer Water Draw Drum	Deethanizer Water Draw Drum Drain to Flare KO Drum	0.05	0.15	0.10	0.0000	5.00	15.00	10.00	0.0000	2	9	0.000	0.0000
Alky 3	V-1055	Propane KOH Treater	Propane KOH Treater to Spent KOH Tank	0.00	0.00	0.00	0.0000	0.00	0.00	0.01	0.0000	61	0	0.000	0.0000
Alky 3	V-1061	Debutanizer Overhead Accumulator	Debutanizer Overhead Accumulator Drain to Spent KOH Tank	0.00	0.01	0.01	0.0000	0.47	0.78	0.63	0.0000	4,975	0	0.000	0.0001

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
Alky 3	V-1062A/B	Butane KOH Treaters	Butane KOH Treater Drains to Oily Water Sewer		X		X						X	27,364	276
Alky 3	V-1071	Fuel Gas Coalescer	Fuel Gas Coalescer Drain to Flare KO Drum	X			X						X	98.45	68.91
Alky 3	V-1072 A/B	Fuel Gas Strainers	Fuel Gas Strainers Drain to Flare KO Drum	X			X						X	197	138
ARU	601-F	Depentanizer Receiver	Depentanizer Receiver Drain to NESHAP Drum	X			X						X	639,377	44,756
ARU	601-FA	Depentanizer Overhead Accumulator	Depentanizer Overhead Accumulator Drain to NESHAP Drum	X			X						X	159,844	11,189
ARU	605-F	Recovery Column Receiver	Recovery Column Receiver Drain to NESHAP Drum	X			X						X	2,955,315	25,374
ARU	672-F	Oil-Water Separator / NESHAP Drum	Oil-Water Separator Water Sample Purge to Pad		X		X						X	98.72	0
ARU	DWS #8	Dry Weather Sump #8	Dry Weather Sump Sample Purge to Pad		X		X						X	346	0
ARU	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	X			X						X	0	64.37
ARU	Temporary Sulfolane Skid	Hydrocarbon phase	Hydrocarbon and water drained to Frac Tanks	X							X		X	135,557	3,933

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General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
Alky 3	V-1062A/B	Butane KOH Treaters	Butane KOH Treater Drains to Oily Water Sewer	0.00	0.01	0.01	0.0000	0.47	0.78	0.63	0.0000	28	0	0.000	0.0000
Alky 3	V-1071	Fuel Gas Coalescer	Fuel Gas Coalescer Drain to Flare KO Drum	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	0	9	0.000	0.0000
Alky 3	V-1072 A/B	Fuel Gas Strainers	Fuel Gas Strainers Drain to Flare KO Drum	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	0	9	0.000	0.0000
ARU	601-F	Depentanizer Receiver	Depentanizer Receiver Drain to NESHAP Drum	75.13	91.88	83.50	0.0534	7512.50	9187.50	8350.00	0.3737	684	624	0.427	0.0000
ARU	601-FA	Depentanizer Overhead Accumulator	Depentanizer Overhead Accumulator Drain to NESHAP Drum	75.13	91.88	83.50	0.0133	7512.50	9187.50	8350.00	0.0934	171	624	0.107	0.0000
ARU	605-F	Recovery Column Receiver	Recovery Column Receiver Drain to NESHAP Drum	375.00	625.00	500.00	1.4777	169500.00	282500.00	226000.00	5.7345	2,981	2,420	7.212	0.0000
ARU	672-F	Oil-Water Separator / NESHAP Drum	Oil-Water Separator Water Sample Purge to Pad	49.41	1241.13	290.61	0.0000	0.00	0.00	0.00	0.0000	0.1	291	0.000	0.0000
ARU	DWS #8	Dry Weather Sump #8	Dry Weather Sump Sample Purge to Pad	0.15	16.21	3.87	0.0000	0.00	0.00	0.00	0.0000	0.3	4	0.000	0.0000
ARU	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	375.00	625.00	500.00	0.0000	168000.00	280000.00	224000.00	0.0144	0	224,000	0.014	0.0000
ARU	Temporary Sulfolane Skid	Hydrocarbon phase	Hydrocarbon and water drained to Frac Tanks	0.00	0.00	0.00	0.0000	2.25	2.25	2.50	0.0000	139	0	0.000	0.0000

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General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
AU2	F-603	Clay Treater	Clay Treater Hydrocarbon Deinventory to AU2 Flare KO Drum	X			X						X	0	60,960
AU2	F-603	Clay Treater	Clay Treater Steamout to AU2 Flare KO Drum	X			X						X	68,667	1,219
AU2	F-604	Toluene Feed Surge Drum Water Draw-Off Pot	Toluene Feed Surge Drum Water Draw-Off Pot Drain to AU2 Flare KO Drum	X			X						X	0	33
AU2	F-605	High Pressure Separator Water Draw-Off Pot	High Pressure Separator Water Draw-Off Pot Drain to AU2 Flare KO Drum	X			X						X	160	15
AU2	F-650A/B	Toluene Feed Driers	Toluene Feed Drier Regeneration Waste to Three Phase Separator	X			X						X	27,761	739,645
AU2	F-660	Offsite Flare KO Drum	Offsite Flare KO Drum Drain to Heavy Slop	X			X						X	0	39,378
AU2	F-681	Fuel Gas Dry Drum	Fuel Gas Dry Drum Drain to AU2 Flare KO Drum	X			X						X	2,764	1,935
AU2	J-602	Recycle Gas Compressor	Recycle Gas Compressor Suction Drain (KO Boot) to AU2 Flare KO Drum	X			X						X	75	60
AU2	NA	AU2 Cooling Tower	AU2 Cooling Tower Blowdown to Oily Water Sewer	X						X			X	477,626,596	0
AU2	NA	Lube Oil Reservoir	Lube Oil Reservoir Spent Lube Oil to Used Oil Tote	X			X						X	0	909
AU2	NA	Lube Oil Filters	Filter Changeout to Holding Drum	X			X						X	0	190

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General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
AU2	F-603	Clay Treater	Clay Treater Hydrocarbon Deinventory to AU2 Flare KO Drum	8.18	13.63	10.90	0.0000	817.50	1362.50	1090.00	0.0664	61	1,090	0.066	0.0000
AU2	F-603	Clay Treater	Clay Treater Steamout to AU2 Flare KO Drum	8.18	13.63	10.90	0.0007	817.50	1362.50	1090.00	0.0013	70	30	0.002	0.0000
AU2	F-604	Toluene Feed Surge Drum Water Draw-Off Pot	Toluene Feed Surge Drum Water Draw-Off Pot Drain to AU2 Flare KO Drum	8.18	13.63	10.90	0.0000	817.50	1362.50	1090.00	0.0000	0	1,090	0.000	0.0000
AU2	F-605	High Pressure Separator Water Draw-Off Pot	High Pressure Separator Water Draw-Off Pot Drain to AU2 Flare KO Drum	807.23	1345.38	1076.30	0.0002	80722.50	134537.50	107630.00	0.0017	0	10,469	0.002	0.0000
AU2	F-650A/B	Toluene Feed Driers	Toluene Feed Drier Regeneration Waste to Three Phase Separator	8.18	13.63	10.90	0.0003	817.50	1362.50	1090.00	0.8062	767	1,051	0.807	0.0000
AU2	F-660	Offsite Flare KO Drum	Offsite Flare KO Drum Drain to Heavy Slop	0.00	0.00	0.00	0.0000	61615.00	99225.00	80420.00	3.1668	39	80,420	3.167	0.0000
AU2	F-681	Fuel Gas Dry Drum	Fuel Gas Dry Drum Drain to AU2 Flare KO Drum	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	5	9	0.000	0.0000
AU2	J-602	Recycle Gas Compressor	Recycle Gas Compressor Suction Drain (KO Boot) to AU2 Flare KO Drum	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	2	0.000	0.0000
AU2	NA	AU2 Cooling Tower	AU2 Cooling Tower Blowdown to Oily Water Sewer	0.00	0.00	0.00	0.0005	0.00	0.00	0.00	0.0000	477,627	0	0.000	0.0000
AU2	NA	Lube Oil Reservoir	Lube Oil Reservoir Spent Lube Oil to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	1	5	0.000	0.0000
AU2	NA	Lube Oil Filters	Filter Changeout to Holding Drum	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000

NOTE: Each line item is split across two pages.

Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit (Show A)	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
AU2	NA	Seal Oil Filters	Filter Changeout to Holding Drum	X			X						X	0	47
AU2	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	X			X						X	0	132
AU2	NA	Moisture Analyzer Maintenance	Moisture Analyzer Maintenance to Pad		X		X						X	0	0
AU2	NA	Seal Oil Reservoir	Seal Oil Reservoir to Used Oil Tote	X			X						X	0	2,897
AU2	NA	Fuel Gas Strainers	Fuel Gas Strainers Blowdown to Flare KO Drum	X			X						X	13,820	9,674
CFHU	101-E	Product Stripper	Product Stripper Upsets to Slop Header	X				X					X	0	103,765
CFHU	101-J-A 102-J-A	Makeup/Recycle Compressor	Makeup/Recycle Compressor Lube Oil Drips to Sewer		X		X						X	0	22,053
CFHU	101-J-B 102-J-B	Makeup/Recycle Compressor	Makeup/Recycle Compressor Lube Oil Drips to Sewer		X		X						X	0	22,053
CFHU	101-J-C 102-J-C	Makeup/Recycle Compressor	Makeup/Recycle Compressor Lube Oil Drips to Sewer		X		X						X	0	22,053
CFHU	102-L-1 through L-8	Fresh Feed Filters	Fresh Feed Filter Changeout to Dry Flare Drum	X			X						X	0	1,450,299

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
AU2	NA	Seal Oil Filters	Filter Changeout to Holding Drum	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
AU2	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	807.23	1345.38	1076.30	0.0000	80722.50	134537.50	107630.00	0.0142	0	107,630	0.014	0.0000
AU2	NA	Moisture Analyzer Maintenance	Moisture Analyzer Maintenance to Pad	807.23	1345.38	1076.30	0.0000	80722.50	134537.50	107630.00	0.0000	0	107,630	0.000	0.0000
AU2	NA	Seal Oil Reservoir	Seal Oil Reservoir to Used Oil Tote	0.00	0.00	0.00	0.0000	43.20	52.80	48.00	0.0001	3	48	0.000	0.0000
AU2	NA	Fuel Gas Strainers	Fuel Gas Strainers Blowdown to Flare KO Drum	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000
CFHU	101-E	Product Stripper	Product Stripper Upsets to Slop Header	0.38	0.63	0.50	0.0000	37.50	62.50	50.00	0.0052	104	50	0.005	0.0000
CFHU	101-J-A 102-J-A	Makeup/Recycle Compressor	Makeup/Recycle Compressor Lube Oil Drips to Sewer	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0001	22	5	0.000	0.0001
CFHU	101-J-B 102-J-B	Makeup/Recycle Compressor	Makeup/Recycle Compressor Lube Oil Drips to Sewer	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0001	22	5	0.000	0.0001
CFHU	101-J-C 102-J-C	Makeup/Recycle Compressor	Makeup/Recycle Compressor Lube Oil Drips to Sewer	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0001	22	5	0.000	0.0001
CFHU	102-L-1 through L-8	Fresh Feed Filters	Fresh Feed Filter Changeout to Dry Flare Drum	0.00	0.00	0.00	0.0000	37.50	62.50	50.00	0.0725	1,450	50	0.073	0.0000

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
CFHU	107-F	Sour Fuel Gas KO Drum	Sour Fuel Gas KO Drum Drain to Wet Flare KO Drum	X			X						X	346	242
CFHU	109-F	Sweet Fuel Gas KO Drum	Sweet Fuel Gas KO Drum Drain to Wet Flare KO Drum	X			X						X	0	967
CFHU	110-F	Make-Up Compressor KO Drum	Make-Up Compressor KO Drum Drain to Wet Flare KO Drum	X			X						X	6,313,356	3,367,123
CFHU	113-FA	Dry Flare Drum	Dry Flare Drum Drain to Oily Water Sewer	X			X					X		5,845	268
CFHU	123-FA, 124-FA, 125-FA	Makeup Gas Compressor Drain Pots	Makeup Gas Compressor Drain Pot Drains to Wet Flare KO Drum	X			X						X	5,214	0
CFHU	123-FB, 124-FB, 125-FB	Makeup Gas Compressor Drain Pots	Makeup Compressor Drain Pot Drains to Wet Flare KO Drum	X			X						X	5,214	0
CFHU	123-FC, 124-FC, 125-FC	Makeup Gas Compressor Drain Pots	Makeup Gas Compressor Drain Pot Drains to Wet Flare KO Drum	X			X						X	5,214	0
CFHU	126-FA/B/C, 129-FA/B/C	Recycle Gas Compressor Suction Drain Pots	Recycle Gas Compressor Suction Drain Pots Drain to Wet Flare KO Drum	X			X						X	34,240	30,131
CFHU	127-FA, 128-FA	Makeup Gas Compressor KO Drums	Makeup Gas Compressor KO Drum Drains to Wet Flare KO Drum	X			X						X	47,941	0
CFHU	127-FB, 128-FB	Makeup Gas Compressor KO Drums	Makeup Gas Compressor KO Drum Drains to Wet Flare KO Drum	X			X						X	47,941	0
CFHU	127-FC, 128-FC	Makeup Gas Compressor KO Drums	Makeup Gas Compressor KO Drum Drains to Wet Flare KO Drum	X			X						X	47,941	0
CFHU	150-L-A/B	Lube Oil Filter	Lube Oil Filter Changeout to sewer	X			X						X	0	218

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
CFHU	107-F	Sour Fuel Gas KO Drum	Sour Fuel Gas KO Drum Drain to Wet Flare KO Drum	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	1	9	0.000	0.0000
CFHU	109-F	Sweet Fuel Gas KO Drum	Sweet Fuel Gas KO Drum Drain to Wet Flare KO Drum	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	1	21	0.000	0.0000
CFHU	110-F	Make-Up Compressor KO Drum	Make-Up Compressor KO Drum Drain to Wet Flare KO Drum	0.00	10.00	5.00	0.0316	200.00	420.00	310.00	1.0438	9,680	111	1.075	0.0000
CFHU	113-FA	Dry Flare Drum	Dry Flare Drum Drain to Oily Water Sewer	0.38	0.63	0.50	0.0000	37.50	62.50	50.00	0.0000	6	3	0.000	0.0000
CFHU	123-FA, 124-FA, 125-FA	Makeup Gas Compressor Drain Pots	Makeup Gas Compressor Drain Pot Drains to Wet Flare KO Drum	0.00	10.00	5.00	0.0000	200.00	420.00	310.00	0.0000	5	5	0.000	0.0000
CFHU	123-FB, 124-FB, 125-FB	Makeup Gas Compressor Drain Pots	Makeup Compressor Drain Pot Drains to Wet Flare KO Drum	0.00	10.00	5.00	0.0000	200.00	420.00	310.00	0.0000	5	5	0.000	0.0000
CFHU	123-FC, 124-FC, 125-FC	Makeup Gas Compressor Drain Pots	Makeup Gas Compressor Drain Pot Drains to Wet Flare KO Drum	0.00	10.00	5.00	0.0000	200.00	420.00	310.00	0.0000	5	5	0.000	0.0000
CFHU	126-FA/B/C, 129-FA/B/C	Recycle Gas Compressor Suction Drain Pots	Recycle Gas Compressor Suction Drain Pots Drain to Wet Flare KO Drum	0.90	1.10	1.00	0.0000	90.00	110.00	100.00	0.0030	64	47	0.003	0.0000
CFHU	127-FA, 128-FA	Makeup Gas Compressor KO Drums	Makeup Gas Compressor KO Drum Drains to Wet Flare KO Drum	0.00	10.00	5.00	0.0002	200.00	420.00	310.00	0.0000	48	5	0.000	0.0000
CFHU	127-FB, 128-FB	Makeup Gas Compressor KO Drums	Makeup Gas Compressor KO Drum Drains to Wet Flare KO Drum	0.00	10.00	5.00	0.0002	200.00	420.00	310.00	0.0000	48	5	0.000	0.0000
CFHU	127-FC, 128-FC	Makeup Gas Compressor KO Drums	Makeup Gas Compressor KO Drum Drains to Wet Flare KO Drum	0.00	10.00	5.00	0.0002	200.00	420.00	310.00	0.0000	48	5	0.000	0.0000
CFHU	150-L-A/B	Lube Oil Filter	Lube Oil Filter Changeout to sewer	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
CFHU	151-L-A/B	Seal Oil Filter	Seal Oil Filter Changeout to sewer	X			X						X	0	12
CFHU	152-L-A/B	Lube Oil Filter	Lube Oil Filter Changeout to sewer	X			X						X	0	218
CFHU	153-L-A/B	Lube Oil Filter	Lube Oil Filter Changeout to sewer	X			X						X	0	218
CFHU	154-L-A/B	Seal Oil Filter	Seal Oil Filter Changeout to sewer	X			X						X	0	182
CFHU	172-C	Cooling Tower	Cooling Tower Blowdowns		X	X							X	318,417,731	0
CFHU	173-L, 174-L	Lube Oil Filters	Lube Oil Filters Changeout to Oily Water Sewer	X			X						X	0	61
~~CFHU~~	~~179F~~	~~Liquid Knockout Vessel~~	~~Liquid Knockout Vessel Drain to Flare Header via Overhead Drum~~	~~X~~			~~X~~						~~X~~	~~17,862~~	~~10,479~~
CFHU	179F	Liquid Knockout Vessel	Liquid Knockout Vessel Drain to Flare Header via Overhead Drum	X			X						X	17,862	10,479
~~CFHU~~	~~180F~~	~~Liquid Knockout Vessel~~	~~Liquid Knockout Vessel Drain to Flare Header via Overhead Drum~~	~~X~~			~~X~~						~~X~~	~~57,736~~	~~33,872~~
CFHU	180F	Liquid Knockout Vessel	Liquid Knockout Vessel Drain to Flare Header via Overhead Drum	X			X						X	57,736	33,872
CFHU	183-F	Fuel Gas Cyclone Separator	Fuel Gas Cyclone Separator Drain to Wet Flare KO Drum	X			X						X	0	415
CFHU	183-L	Fuel Gas Coalescer	Fuel Gas Coalescer to Heaters	X			X						X	0.00	967.41

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
CFHU	151-L-A/B	Seal Oil Filter	Seal Oil Filter Changeout to sewer	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
CFHU	152-L-A/B	Lube Oil Filter	Lube Oil Filter Changeout to sewer	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
CFHU	153-L-A/B	Lube Oil Filter	Lube Oil Filter Changeout to sewer	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
CFHU	154-L-A/B	Seal Oil Filter	Seal Oil Filter Changeout to sewer	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
CFHU	172-C	Cooling Tower	Cooling Tower Blowdowns	0.00	0.00	0.00	0.0003	0.00	0.00	0.00	0.0000	318,418	0	0.000	0.0003
CFHU	173-L, 174-L	Lube Oil Filters	Lube Oil Filters Changeout to Oily Water Sewer	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
~~CFHU~~	~~179F~~	~~Liquid Knockout Vessel~~	~~Liquid Knockout Vessel Drain to Flare Header via Overhead Drum~~	0.90	1.10	1.00	~~0.0000~~	90.00	110.00	100.00	~~0.0010~~	~~28~~	~~38~~	~~0.001~~	~~0.0000~~
CFHU	179F	Liquid Knockout Vessel	Liquid Knockout Vessel Drain to Flare Header via Overhead Drum	0.90	1.10	1.00	0.0000	90.00	110.00	100.00	0.0010	28	38	0.001	0.0000
~~CFHU~~	~~180F~~	~~Liquid Knockout Vessel~~	~~Liquid Knockout Vessel Drain to Flare Header via Overhead Drum~~	0.90	1.10	1.00	~~0.0001~~	90.00	110.00	100.00	~~0.0034~~	~~92~~	~~38~~	~~0.003~~	~~0.0000~~
CFHU	180F	Liquid Knockout Vessel	Liquid Knockout Vessel Drain to Flare Header via Overhead Drum	0.90	1.10	1.00	0.0001	90.00	110.00	100.00	0.0034	92	38	0.003	0.0000
CFHU	183-F	Fuel Gas Cyclone Separator	Fuel Gas Cyclone Separator Drain to Wet Flare KO Drum	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	0	21	0.000	0.0000
CFHU	183-L	Fuel Gas Coalescer	Fuel Gas Coalescer to Heaters	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	1	21	0.000	0.0000

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Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
CFHU	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	X			X						X	0	67
Coker	B-201	Coking Heater	Coking Heater De-coking Waste Drain to Coke Yard Sump		X		X		X				X	327,142	0
Coker	B-301	Coking Heater	Decoking Waste from Coking Heater Drain to Coke Yard Sump		X		X						X	327,142	0
Coker	CT-190	Cooling Tower	Cooling Tower Blowdowns		X	X							X	47,762,660	0
Coker	E-501	Oil Scrubber	Oil Scrubber Drain to Slop Header	X			X						X	2,321,796	199,976,285
Coker	F-201A/B	Coker "B" Coke Drums	Coke Drum Cutting Water to Coke Yard Sump		X		X						X	132,443,718	0

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
CFHU	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	0.90	1.10	1.00	0.0000	90.00	110.00	100.00	0.0000	0	100	0.000	0.0000
Coker	B-201	Coking Heater	Coking Heater De-coking Waste Drain to Coke Yard Sump	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	327	0	0.000	0.0000
Coker	B-301	Coking Heater	Decoking Waste from Coking Heater Drain to Coke Yard Sump	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	327	0	0.000	0.0000
Coker	CT-190	Cooling Tower	Cooling Tower Blowdowns	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	47,763	0	0.000	0.00005
Coker	E-501	Oil Scrubber	Oil Scrubber Drain to Slop Header	0.38	0.63	0.50	0.0012	37.50	62.50	50.00	9.9988	202,298	49	10.000	0.0000
Coker	F-201A/B	Coker "B" Coke Drums	Coke Drum Cutting Water to Coke Yard Sump	0.00	0.00	0.00	0.0001	0.00	0.00	0.00	0.0000	132,444	0	0.000	0.0001

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
Coker	F-201A/B	Coker "B" Coke Drums	Coke Drum Cooling Water (Quench Water) to Cooldown Stack		X		X						X	522,404,089	0
Coker	F-203	Reflux Drum	Reflux Drum Sour Water to Sour Water Utilities to Deepwells	X		X							X	24,627,621	211,449
Coker	F-301A/B	Coker "C" Coke Drums	Coke Drum Cutting Water to Coke Yard Sump		X		X						X	132,443,718	0
Coker	F-301A/B	Coker "C" Coke Drums	Coke Drum Cooling Water (Quench Water) to Cooldown Stack		X		X						X	522,404,089	0
Coker	F-303	Reflux Drum	Reflux Drum Water Boot to Sour Water Utilities to Deepwells	X		X							X	24,627,621	211,449
Coker	F-501	Accumulator Drum	Accumulator Drum Oil to Slop Header	X			X						X	69,654	5,999,289
Coker	F-504	Sour Water Tank	Sour Water Tank to Sour Water Utilities to Deepwells	X			X						X	103,958,414	444,043
Coker	F-550	Coker Quench Drum	Knock Out Drum Drain to Slop Header	X			X						X	0	349,502

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
Coker	F-201A/B	Coker "B" Coke Drums	Coke Drum Cooling Water (Quench Water) to Cooldown Stack	0.03	0.40	0.25	0.1290	0.00	0.00	0.00	0.0000	522,404	0	0.129	0.1290
Coker	F-203	Reflux Drum	Reflux Drum Sour Water to Sour Water Utilities to Deepwells	15.75	26.25	21.00	0.5172	1575.00	2625.00	2100.00	0.4440	24,839	39	0.961	0.0000
Coker	F-301A/B	Coker "C" Coke Drums	Coke Drum Cutting Water to Coke Yard Sump	0.00	0.00	0.00	0.0001	0.00	0.00	0.00	0.0000	132,444	0	0.000	0.0001
Coker	F-301A/B	Coker "C" Coke Drums	Coke Drum Cooling Water (Quench Water) to Cooldown Stack	0.03	0.39	0.28	0.1485	0.00	0.00	0.00	0.0000	522,404	0	0.148	0.1485
Coker	F-303	Reflux Drum	Reflux Drum Water Boot to Sour Water Utilities to Deepwells	15.75	26.25	21.00	0.5172	1575.00	2625.00	2100.00	0.4440	24,839	39	0.961	0.0000
Coker	F-501	Accumulator Drum	Accumulator Drum Oil to Slop Header	0.38	0.63	0.50	0.0000	37.50	62.50	50.00	0.3000	6,069	49	0.300	0.0000
Coker	F-504	Sour Water Tank	Sour Water Tank to Sour Water Utilities to Deepwells	15.30	18.70	17.00	1.7673	1530.00	1870.00	1700.00	0.7549	104,402	24	2.522	0.0000
Coker	F-550	Coker Quench Drum	Knock Out Drum Drain to Slop Header	15.75	26.25	21.00	0.0000	1575.00	2625.00	2100.00	0.7340	350	2,100	0.734	0.0000

NOTE: Each line item is split across two pages.

Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
Coker	L-180A/B	Pressure Filter	Pressure Filter Changeout to Used Oil Tote	X			X						X	0	0
Coker	L-181A/B	Return Oil Filter	Pressure Filter Changeout to Used Oil Tote	X			X						X	0	49
Coker	L-182	Fill Filter	Fill Filter Changeout to Used Oil Tote	X			X						X	0	25
Coker	L-211A/B	106 Seal Oil Filters	Filters Changeout to OWS	X			X						X	0	961
Coker	L-420A/B	Seal Oil Filter Changeout	Seal Oil Filter Changeouts to OWS	X			X						X	0	545
Coker	NA	Cutting Water Filter Canister	Filters Changeout to Pad		X		X						X	45	0
Coker	NA	Duplex Strainer	Duplex Strainer Drain to Pad		X		X						X	23	0
Coker	NA	Spills/Drips	Spills/Drips into Oily Water Sewer	X			X						X	0	22,574
CT Leaks	Consent Decree Cooling Towers	Consent Decree Cooling Towers	Calculated Coolintg Tower Leaks per 19.W of Consent Decree		X								X	NA	NA
DDU	3F-103	Low Temperature Separator	Low Temperature Separator Drain to Sour Water Header	X			X						X	657,645	62,111
DDU	3F-104	Reflux Drum	Reflux Drum Water Draw Drain to Oily Water Collection Drum	X			X						X	175,372	16,563

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
Coker	L-180A/B	Pressure Filter	Pressure Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	0	0.000	0.0000
Coker	L-181A/B	Return Oil Filter	Pressure Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
Coker	L-182	Fill Filter	Fill Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
Coker	L-211A/B	106 Seal Oil Filters	Filters Changeout to OWS	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	1	5	0.000	0.0000
Coker	L-420A/B	Seal Oil Filter Changeout	Seal Oil Filter Changeouts to OWS	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	1	5	0.000	0.0000
Coker	NA	Cutting Water Filter Canister	Filters Changeout to Pad	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	0	0	0.000	0.0000
Coker	NA	Duplex Strainer	Duplex Strainer Drain to Pad	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	0	0	0.000	0.0000
Coker	NA	Spills/Drips	Spills/Drips into Oily Water Sewer	15.75	26.25	21.00	0.0000	1575.00	2625.00	2100.00	0.0474	23	2,100	0.047	0.0000
CT Leaks	Consent Decree Cooling Towers	Consent Decree Cooling Towers	Calculated Coolintg Tower Leaks per 19.W of Consent Decree	NA	N A	NA	NA	NA	NA	NA	0.0000	NA	NA	0.000	0.0000
DDU	3F-103	Low Temperature Separator	Low Temperature Separator Drain to Sour Water Header	0.11	0.19	0.15	0.0001	933.00	1555.00	1244.00	0.0773	720	107	0.077	0.0000
DDU	3F-104	Reflux Drum	Reflux Drum Water Draw Drain to Oily Water Collection Drum	9.00	15.00	12.00	0.0021	3750.00	6250.00	5000.00	0.0828	192	442	0.085	0.0000

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
DDU	3F-106	Fuel Gas Knock Out Drum	Fuel Gas Knock Out Drum Drain to Oily Water Collection Drum	X			X						X	467,658	44,168
DDU	3F-115	Flare KO Drum	Flare KO Drum Drain to Heavy Slop Header	X			X						X	0	28,966
DDU	3F-203	Low Temperature Separator	Low Temperature Separator Drain to Sour Water Header	X			X						X	723,409	6,211
DDU	3F-210	Compressor Knockout Drum	Compressor Knockout Drum Drain to Degassing Drum	X			X						X	197,293	18,633
DDU	Boiler Fuel Gas Header	Boiler Fuel Gas Header	100/200 Train Boiler Fuel Gas Header Blowdown to Flare KO Drum	X			X						X	5,252	235
DDU	BWON Tag# 920G	Sewer Junction Box	Sewer Junction Box receives flow from UU4 DWS		X		X						x	34,129	0
DDU	BWON Tag# 920G	Sewer Junction Box	Sewer Junction Box receives flow from DDU 100/200 DWS		X		X						X	20,702	0
DDU	DDU 300 Amine Equipment	DDU 300 Equipment Containing Amine	DDU 300 Amine Equipment Maintenance Wastes to S-306 Amine Sump - Hydrocarbon Phase		X		X						X	0	5,035
DDU	DDU 300 Amine Equipment	DDU 300 Equipment Containing Amine	DDU 300 Amine Equipment Maintenance Wastes to S-306 Amine Sump - Amine Phase		X		X						X	92,548	0

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
DDU	3F-106	Fuel Gas Knock Out Drum	Fuel Gas Knock Out Drum Drain to Oily Water Collection Drum	9.75	16.25	13.00	0.0061	4500.00	7500.00	6000.00	0.2650	512	530	0.271	0.0000
DDU	3F-115	Flare KO Drum	Flare KO Drum Drain to Heavy Slop Header	0.11	0.19	0.15	0.0000	933.00	1555.00	1244.00	0.0360	29	1,244	0.036	0.0000
DDU	3F-203	Low Temperature Separator	Low Temperature Separator Drain to Sour Water Header	0.11	0.19	0.15	0.0001	933.00	1555.00	1244.00	0.0077	730	11	0.008	0.0000
DDU	3F-210	Compressor Knockout Drum	Compressor Knockout Drum Drain to Degassing Drum	38.00	105.00	71.50	0.0141	13725.00	22875.00	18300.00	0.3410	216	1,645	0.355	0.0000
DDU	Boiler Fuel Gas Header	Boiler Fuel Gas Header	100/200 Train Boiler Fuel Gas Header Blowdown to Flare KO Drum	9.75	16.25	13.00	0.0001	4500.00	7500.00	6000.00	0.0014	5	269	0.001	0.0000
DDU	BWON Tag# 920G	Sewer Junction Box	Sewer Junction Box receives flow from UU4 DWS	0.01	9.60	1.50	0.0001	0.00	0.00	0.00	0.0000	34	2	0.000	0.0000
DDU	BWON Tag# 920G	Sewer Junction Box	Sewer Junction Box receives flow from DDU 100/200 DWS	0.01	0.26	0.12	0.0000	0.00	0.00	0.00	0.0000	21	0	0.000	0.0000
DDU	DDU 300 Amine Equipment	DDU 300 Equipment Containing Amine	DDU 300 Amine Equipment Maintenance Wastes to S-306 Amine Sump - Hydrocarbon Phase	9.00	15.00	12.00	0.0000	3750.00	6250.00	5000.00	0.0252	5	5,000	0.025	0.0252
DDU	DDU 300 Amine Equipment	DDU 300 Equipment Containing Amine	DDU 300 Amine Equipment Maintenance Wastes to S-306 Amine Sump - Amine Phase	0.00	10.00	5.00	0.0005	200.00	420.00	310.00	0.0000	93	5	0.000	0.0005

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
DDU	E-102	Skim Pot	Skim Pot to MEA Sump		X		X						X	90	689
DDU	E-203	Skim Pot	Skim Pot to MEA Sump		X		X						X	811	77
DDU	F-106A	Fuel Gas Centrifix Pot	Fuel Gas Centrifix Pot Drain to Oily Water Collection Drum	X			X						X	289	13
DDU	F-204 Water Draw	Reflux Drum Water Draw	Reflux Drum Water Draw Drain to Oily Water Collection Drum	X			X						X	175,372	16,563
DDU	F-205	Feed Surge Drum	Feed Surge Drum Water Boot to 100/200 Oily Water Separator	X			X						X	49,753	4,699
DDU	F-305	Feed Surge Drum	Feed Surge Drum Drain to Sour Water Header	X			X						X	9,851,049	84,580
DDU	F-306	MEA Collection Drum	MEA Collection Drum Oil Skim to Flare KO Drum	X			X						X	0	14,097
DDU	F-313	Fuel Gas KO Drum	Fuel Gas KO Drum Drain to Flare KO Drum	X			X						X	584,573	496,887
DDU	F-315	Flare KO Drum	Flare KO Drum Drain to Heavy Slop	X			X						X	0	7,117
DDU	F-315A	Flare KO Drum	Flare KO Drum Drain to Heavy Slop	X			X							0	0
DDU	F-316	Degassing Drum	Degassing Drum Water to Sour Water Header to Deepwell	X			X						X	54,180,767	465,188

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
				Aqueous Phase				Organic Phase							
Process Unit	Vessel or Equipment		Stream	Benzene Concentration (ppmw)			BQ	Benzene Concentration (ppmw)			BQ	Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
Name	Equipment No.	Name	Description	Min.	Max.	Avg.	(Mg/yr)	Min.	Max.	Avg.	(Mg/yr)				
DDU	E-102	Skim Pot	Skim Pot to MEA Sump	0.08	0.14	0.11	0.0000	8.00	14.00	11.00	0.0000	1	10	0.000	0.0000
DDU	E-203	Skim Pot	Skim Pot to MEA Sump	9.75	16.25	13.00	0.0000	4500.00	7500.00	6000.00	0.0005	1	530	0.000	0.0005
DDU	F-106A	Fuel Gas Centrifix Pot	Fuel Gas Centrifix Pot Drain to Oily Water Collection Drum	9.75	16.25	13.00	0.0000	4500.00	7500.00	6000.00	0.0001	0	269	0.000	0.0000
DDU	F-204 Water Draw	Reflux Drum Water Draw	Reflux Drum Water Draw Drain to Oily Water Collection Drum	9.75	16.25	13.00	0.0023	4500.00	7500.00	6000.00	0.0994	192	530	0.102	0.0000
DDU	F-205	Feed Surge Drum	Feed Surge Drum Water Boot to 100/200 Oily Water Separator	0.11	0.19	0.15	0.0000	933.00	1555.00	1244.00	0.0058	54	107	0.006	0.0000
DDU	F-305	Feed Surge Drum	Feed Surge Drum Drain to Sour Water Header	22.50	37.50	30.00	0.2955	2250.00	3750.00	3000.00	0.2537	9,936	55	0.549	0.0000
DDU	F-306	MEA Collection Drum	MEA Collection Drum Oil Skim to Flare KO Drum	9.00	15.00	12.00	0.0000	3750.00	6250.00	5000.00	0.0705	14	5,000	0.070	0.0000
DDU	F-313	Fuel Gas KO Drum	Fuel Gas KO Drum Drain to Flare KO Drum	9.00	15.00	12.00	0.0070	3750.00	6250.00	5000.00	2.4844	1,081	2,304	2.491	0.0000
DDU	F-315	Flare KO Drum	Flare KO Drum Drain to Heavy Slop	9.00	15.00	12.00	0.0000	3750.00	6250.00	5000.00	0.0356	7	5,000	0.036	0.0000
DDU	F-315A	Flare KO Drum	Flare KO Drum Drain to Heavy Slop	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	0	0	0.000	0.0000
DDU	F-316	Degassing Drum	Degassing Drum Water to Sour Water Header to Deepwell	9.00	15.00	12.00	0.6502	3750.00	6250.00	5000.00	2.3259	54,646	54	2.976	0.0000

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Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
DDU	F-316	Degassing Drum	Degassing Drum Oil to Light Slop	X			X						X	0	790,926
DDU	F-326	Packing Purge Pot	Packing Purge Pot Drain to Drain Sump		X		X						X	0	742
DDU	F-326A	Packing Purge Pot	Packing Purge Pot Drain to Drain Sump		X		X						X	0	742
DDU	J-110 / J-110A	Hydrogen Compressor Suction and Discharge Bottles	Hydrogen Compressor Suction and Discharge Bottles Drains to F-115	X			X						X	0	587
DDU	J-210	Hydrogen Compressor Suction and Discharge Bottles	Hydrogen Compressor Suction and Discharge Bottles Drains	X			X						X	0	587
DDU	L-102/ L-102 A	Feed Filters	Feed Filters Drain to Oily Water Collection Drum	X			X						X	0	10,210
DDU	L-202/ L-202A	Feed Filters	Feed Filters Change Outs	X			X						X	0	24,504
DDU	L-302/L-302A	Feed Filters	Feed Filters to Flare KO Drum	X			X						X	0	74,533

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
DDU	F-316	Degassing Drum	Degassing Drum Oil to Light Slop	0.00	0.00	0.00	0.0000	6742.50	11237.50	8990.00	7.1104	791	8,990	7.110	0.0000
DDU	F-326	Packing Purge Pot	Packing Purge Pot Drain to Drain Sump	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	1	5	0.000	0.0000
DDU	F-326A	Packing Purge Pot	Packing Purge Pot Drain to Drain Sump	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	1	5	0.000	0.0000
DDU	J-110 / J-110A	Hydrogen Compressor Suction and Discharge Bottles	Hydrogen Compressor Suction and Discharge Bottles Drains to F-115	38.00	105.00	71.50	0.0000	13725.00	22875.00	18300.00	0.0107	1	18,300	0.011	0.0000
DDU	J-210	Hydrogen Compressor Suction and Discharge Bottles	Hydrogen Compressor Suction and Discharge Bottles Drains	38.00	105.00	71.50	0.0000	13725.00	22875.00	18300.00	0.0107	1	18,300	0.011	0.0000
DDU	L-102/ L-102 A	Feed Filters	Feed Filters Drain to Oily Water Collection Drum	0.11	0.19	0.15	0.0000	933.00	1555.00	1244.00	0.0127	10	1,244	0.013	0.0000
DDU	L-202/ L-202A	Feed Filters	Feed Filters Change Outs	0.11	0.19	0.15	0.0000	933.00	1555.00	1244.00	0.0305	25	1,244	0.030	0.0000
DDU	L-302/L-302A	Feed Filters	Feed Filters to Flare KO Drum	22.50	37.50	30.00	0.0000	2250.00	3750.00	3000.00	0.2236	75	3,000	0.224	0.0000

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
DDU	L-306	Fuel Gas Coalescer	Fuel Gas Coalescer to Flare KO Drum	X			X						X	584,573	496,887
DDU	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	X			X						X	0	64
DDU	NA	Pump 310J/JA Lube Oil Filters	Lube Oil Filter Change-Outs		X		X						X	0	109
Docks	Dock 32	Dock 32 Controlled Wastes	Dock 32 Controlled Wastes to Dock 32 Sump	X			X						X	0	43,856
Docks	Dock 33	Dock 33 Controlled Wastes	Dock 33 Controlled Wastes to Dock 33 Sump	X			X						X	0	26,011
Docks	Dock 34	Dock 34 Controlled Wastes	Dock 34 Controlled Wastes to Dock 34 Sump	X			X						X	0	26,859
Docks	Dock 37	Dock 37 Controlled Wastes	Dock 37 Controlled Wastes to Dock 37 Sump	X			X						X	0	56,124
Docks	Dock 38	Dock 38 Controlled Wastes	Dock 38 Controlled Wastes to Dock 38 Sump	X			X						X	0	61,275
Docks	Dock 40/41	Dock 40/41 Uncontrolled Wastes	Dock 40/41 Uncontrolled Wastes to Dock 40/41 Sump		X		X						X	4	666
Docks	Dock 54A/E	Dock 54A/E Controlled Wastes	Dock 54A/E Controlled Wastes to Dock 54A/E Sump	X			X						X	0	3,185

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
DDU	L-306	Fuel Gas Coalescer	Fuel Gas Coalescer to Flare KO Drum	9.00	15.00	12.00	0.0070	3750.00	6250.00	5000.00	2.4844	1,081	2,304	2.491	0.0000
DDU	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	9.75	16.25	13.00	0.0000	4500.00	7500.00	6000.00	0.0004	0	6,000	0.000	0.0000
DDU	NA	Pump 310J/JA Lube Oil Filters	Lube Oil Filter Change-Outs	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
Docks	Dock 32	Dock 32 Controlled Wastes	Dock 32 Controlled Wastes to Dock 32 Sump	0.00	0.00	0.00	0.0000	0.001	1,000,000	119,484	0.0000	44	119,484	6.172	0.0000
Docks	Dock 33	Dock 33 Controlled Wastes	Dock 33 Controlled Wastes to Dock 33 Sump	0.00	0.00	0.00	0.0000	39.70	1,000,000	125,052	0.0000	26	125,052	3.831	0.0000
Docks	Dock 34	Dock 34 Controlled Wastes	Dock 34 Controlled Wastes to Dock 34 Sump	0.00	0.00	0.00	0.0000	50.00	1,000,000	71,552	0.0000	27	71,552	2.264	0.0000
Docks	Dock 37	Dock 37 Controlled Wastes	Dock 37 Controlled Wastes to Dock 37 Sump	0.00	0.00	0.00	0.0000	50.00	30,500	3,932	0.0000	56	3,932	0.260	0.0000
Docks	Dock 38	Dock 38 Controlled Wastes	Dock 38 Controlled Wastes to Dock 38 Sump	0.00	0.00	0.00	0.0000	61.00	20,000	2,195	0.0000	61	2,195	0.158	0.0000
Docks	Dock 40/41	Dock 40/41 Uncontrolled Wastes	Dock 40/41 Uncontrolled Wastes to Dock 40/41 Sump	0.00	0.00	0.00	0.0000	0	0	777	0.0192	1	772	0.001	0.0192
Docks	Dock 54A/E	Dock 54A/E Controlled Wastes	Dock 54A/E Controlled Wastes to Dock 54A/E Sump	0.00	0.00	0.00	0.0000	50.00	1,090	942664.50	3.5366	3	942,664	3.537	0.0000

NOTE: Each line item is split across two pages.

Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
Docks	Dock 54A/E	Dock 54A/E Uncontrolled Wastes	Dock 54A/E Uncontrolled Wastes to Dock 54A/E Sump		X		X						X	0	0
Docks	NA	Crude Meter Prover Pad	Crude Meter Prover Pad Waste to J-33 Sump		X		X						X	15,903	68
Docks	NA	J-38/39 Pump Pad	J-38/39 Pump Pad Wastes to J-38/39 Pump Pad Sump		X		X						X	7,951	68
Docks	NA	Product Meter Prover Pad	Product Meter Prover Pad Waste to J-23 Sump		X		X						X	0	886
FCCU No. 3	411-E	Batch Caustic	Batch Caustic Drain to Deep Well Disposal at Power Stn No. 2	X		X							X	266,953	9,835
FCCU No. 3	420-F	Caustic Settler	Caustic Settler Drain to Merox Regen at PS3A	X			X						X	6,675	88,780
FCCU No. 3	438-F	Maintenance Drum	Maintenance Drum Oil to Slop Header	X			X						X	0	41,115
FCCU No. 3	451-F	B-B Prewash Drum	B-B Prewash Drum Spent Caustic Dump to Deep Wells	X			X						X	549,427	20,242
FCCU No. 3	452-F	B-B Caustic Splitter	B-B Caustic Splitter Drain to Merox Regen at Pipestill 3A	X			X						X	245,385	9,040
FCCU No. 3	475-E	B-B Extractor	B-B Extractor Drain to Merox Regen at Pipestill 3A	X		X							X	25,315,963	179,002
FCCU No. 3	498-FA/B	401-J Lube Oil Filters	401-J Lube Oil Filters Changeout to Used Oil Tote	X			X						X	0	363

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
Docks	Dock 54A/E	Dock 54A/E Uncontrolled Wastes	Dock 54A/E Uncontrolled Wastes to Dock 54A/E Sump	0.00	0.00	0.00	0.0000	0.001	1,000,000	N/A	3.5366	0	0	0.000	0.0000
Docks	NA	Crude Meter Prover Pad	Crude Meter Prover Pad Waste to J-33 Sump	7.13	24.05	12.20	0.0002	713.00	2405.00	1220.00	0.0001	16	17	0.000	0.0003
Docks	NA	J-38/39 Pump Pad	J-38/39 Pump Pad Wastes to J-38/39 Pump Pad Sump	7.13	24.05	12.20	0.0001	713.00	2405.00	1220.00	0.0001	8	22	0.000	0.0002
Docks	NA	Product Meter Prover Pad	Product Meter Prover Pad Waste to J-23 Sump	0.00	0.00	38.00	0.0000	3420.00	4180.00	3800.00	0.0034	1	3,800	0.003	0.0034
FCCU No. 3	411-E	Batch Caustic	Batch Caustic Drain to Deep Well Disposal at Power Stn No. 2	0.05	0.15	0.10	0.0000	5.00	15.00	10.00	0.0001	277	0	0.000	0.0000
FCCU No. 3	420-F	Caustic Settler	Caustic Settler Drain to Merox Regen at PS3A	0.05	0.15	0.10	0.0000	5.00	15.00	10.00	0.0009	95	9	0.001	0.0000
FCCU No. 3	438-F	Maintenance Drum	Maintenance Drum Oil to Slop Header	8.25	13.75	11.00	0.0000	5475.00	9125.00	7300.00	0.3001	41	7,300	0.300	0.0000
FCCU No. 3	451-F	B-B Prewash Drum	B-B Prewash Drum Spent Caustic Dump to Deep Wells	0.05	0.15	0.10	0.0001	5.00	15.00	10.00	0.0002	570	0	0.000	0.0000
FCCU No. 3	452-F	B-B Caustic Splitter	B-B Caustic Splitter Drain to Merox Regen at Pipestill 3A	0.05	0.15	0.10	0.0000	5.00	15.00	10.00	0.0001	254	0	0.000	0.0000
FCCU No. 3	475-E	B-B Extractor	B-B Extractor Drain to Merox Regen at Pipestill 3A	0.05	0.15	0.10	0.0025	5.00	15.00	10.00	0.0018	25,495	0	0.004	0.0000
FCCU No. 3	498-FA/B	401-J Lube Oil Filters	401-J Lube Oil Filters Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
FCCU No. 3	499-FA/B	402-J Lube Oil Filters	402-J Lube Oil Filters Changeout to Used Oil Tote	X			X						X	0	363
FCCU No. 3	501-E	Merox Extractor	Merox Extractor Drain to Merox Regen at Pipestill 3A	X		X							X	12,555,982	462,589
FCCU No. 3	507-F	High Pressure Separator	High Pressure Separator Drain to Deepwells at Power Stn No. 2	X			X						X	485,139,264	2,072,203
FCCU No. 3	510-F	Stripper Water Drawoff Pot	Stripper Water Drawoff Pot Drain to Deepwells at Power Station No. 2	X			X						X	9,900,801	42,290
FCCU No. 3	555-F	Knockout Drum	Knockout Drum Drain to Heavy Slop Header	X			X						X	0	26,288
FCCU No. 3	570-C	Cooling Tower	Cooling Tower Blowdowns		X	X							X	491,557,372	0
FCCU No. 3	NA	Seal Oil Filters	Seal Oil Filter Changeout to Used Oil Tote	X			X						X	0	363
FCCU No. 3	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	X			X						X	0	64
Lab	Lab	Controlled Lab Activities	Controlled Lab Wastes	X			X						X	0	90,682
Lab	Lab	Uncontrolled Lab Activities	Uncontrolled Lab Wastes		X		X						X	0	2,785
Line Clearings	Line Clearings	Uncontrolled Line Clearing Maintenance Activities	Uncontrolled Line Clearing Maintenance Activities		X				X				X	0	0

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Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
FCCU No. 3	499-FA/B	402-J Lube Oil Filters	402-J Lube Oil Filters Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
FCCU No. 3	501-E	Merox Extractor	Merox Extractor Drain to Merox Regen at Pipestill 3A	0.05	0.15	0.10	0.0013	5.00	15.00	10.00	0.0046	13,019	0	0.006	0.0000
FCCU No. 3	507-F	High Pressure Separator	High Pressure Separator Drain to Deepwells at Power Stn No. 2	8.25	13.75	11.00	5.3365	4350.00	7250.00	5800.00	12.0188	487,211	36	17.355	0.0000
FCCU No. 3	510-F	Stripper Water Drawoff Pot	Stripper Water Drawoff Pot Drain to Deepwells at Power Station No. 2	8.25	13.75	11.00	0.1089	4800.00	8000.00	6400.00	0.2707	9,943	38	0.380	0.0000
FCCU No. 3	555-F	Knockout Drum	Knockout Drum Drain to Heavy Slop Header	0.00	0.00	0.00	0.0000	10650.00	17750.00	14200.00	0.3733	26	14,200	0.373	0.0000
FCCU No. 3	570-C	Cooling Tower	Cooling Tower Blowdowns	0.00	0.00	0.00	0.0005	0.00	0.00	0.00	0.0000	491,557	0	0.000	0.0005
FCCU No. 3	NA	Seal Oil Filters	Seal Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
FCCU No. 3	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	0.00	0.00	0.00	0.0000	10650.00	17750.00	14200.00	0.0009	0	14,200	0.001	0.0000
Lab	Lab	Controlled Lab Activities	Controlled Lab Wastes	0.00	0.00	0.00	0.0000	0.01	1,000,000	16,915	1.5339	91	16,915	1.534	0.0000
Lab	Lab	Uncontrolled Lab Activities	Uncontrolled Lab Wastes	0.00	0.00	0.00	0.0000	0.01	1,000,000	6	0.0000	3	6	0.000	0.0000
Line Clearings	Line Clearings	Uncontrolled Line Clearing Maintenance Activities	Uncontrolled Line Clearing Maintenance Activities	0.00	0.00	0.00	0.0000	0.00	1,000,000	0	0.0000	0	0	0.000	0.000

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Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
NDU	F-502	Separator Drum	Separator Drum Drain to Sour Water Header to Deepwells	X			X						X	0	11,056
NDU	F-504	Stabilizer Reflux Drum	Stabilizer Reflux Drum Drain to Sour Water Header to Deepwells	X			X						X	75	1
NDU	F-512	Fuel Gas KO Drum	Fuel Gas KO Drum Drain to Flare K.O. Drum	X			X						X	492	345
NDU	L-501	Fresh Feed Filter	Fresh Feed Filter Change out to Flare K.O. Drum	X			X		X				X	0	3,806
NDU	L-522A/B	Coalescers	Coalescers to Oily Water Sewer	X			X		X				X	9	66
NDU	NA	Sulfur Analyzer Maintenance	Moisture Analyzer Maintenance to oily water sewer	X			X						X	0	16
NDU	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	X			X						X	0	61
NDU	TK-501	Recycle Compressor Lube Oil Reservoir	Recycle Compressor Lube Oil Reservoir Drain to Bucket to Used Oil Tote	X			X						X	0	15
Off-Site Slop	Waste slop from BP and Styrolutions	Waste slop from Offsite	Waste slop from Offsite	X			X						X	991,205	1,965,889
Off-Site Wastewater	Wastewater from BP and Styrolutions	Wastewater from Off-Site	Wastewater from Off-Site	X		X							X	253,966,905	0
NDU2	F-202	Separator Drum, Water Boot	Separator Drum, Water Boot	X			X						X	3,029,088	12,116,352
NDU2	F-205	Stabilizer Reflux Drum WB	Stabilizer Reflux Drum WB	X			X						X	984,454	3,937,814
NDU2	L-204B	Burner Gas Coalescer	Burner Gas Coalescer	X			X						X	1,817	6,179
NDU2	L-204B	Burner Gas Coalescer	Burner Gas Coalescer	X			X						X	8,906	154
NDU2	L-204A	Burner Gas Coalescer	Burner Gas Coalescer	X			X						X	1,817	6,179
NDU2	L-204A	Burner Gas Coalescer	Burner Gas Coalescer	X			X						X	8,906	154

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
NDU	F-502	Separator Drum	Separator Drum Drain to Sour Water Header to Deepwells	90.00	110.00	100.00	0.0000	9000.00	11000.00	10000.00	0.1106	11	10,000	0.111	0.0000
NDU	F-504	Stabilizer Reflux Drum	Stabilizer Reflux Drum Drain to Sour Water Header to Deepwells	360.00	440.00	400.00	0.0000	36000.00	44000.00	40000.00	0.0000	0	737	0.000	0.0000
NDU	F-512	Fuel Gas KO Drum	Fuel Gas KO Drum Drain to Flare K.O. Drum	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	1	9	0.000	0.0000
NDU	L-501	Fresh Feed Filter	Fresh Feed Filter Change out to Flare K.O. Drum	90.00	110.00	100.00	0.0000	9000.00	11000.00	10000.00	0.0381	4	10,000	0.038	0.0000
NDU	L-522A/B	Coalescers	Coalescers to Oily Water Sewer	360.00	440.00	400.00	0.0000	36000.00	44000.00	40000.00	0.0026	0	35,422	0.003	0.0000
NDU	NA	Sulfur Analyzer Maintenance	Moisture Analyzer Maintenance to oily water sewer	360.00	440.00	400.00	0.0000	36000.00	44000.00	40000.00	0.0006	0	40,000	0.001	0.0000
NDU	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	90.00	110.00	100.00	0.0000	9000.00	11000.00	10000.00	0.0006	0	10,000	0.001	0.0000
NDU	TK-501	Recycle Compressor Lube Oil Reservoir	Recycle Compressor Lube Oil Reservoir Drain to Bucket to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
Off-Site Slop	Waste slop from BP and Styrolutions	Waste slop from Offsite	Waste slop from Offsite	130.00	170.00	150.00	0.1487	55400.00	130000.00	57110.41	112.2727	2,957	38,018	112.421	0.0000
Off-Site Wastewater	Wastewater from BP and Styrolutions	Wastewater from Off-Site	Wastewater from Off-Site	9.00	15.00	12.00	3.0476	4.93	402.00	96.29	0.0000	253,967	12.00	3.048	0.0000
NDU2	F-202	Separator Drum, Water Boot	Separator Drum, Water Boot	5.00	18.11	7.48	0.0227	5.00	18.11	18.11	0.2194	15,145	16	0.242	0.0000
NDU2	F-205	Stabilizer Reflux Drum WB	Stabilizer Reflux Drum WB	5.00	18.11	7.48	0.0074	5.00	18.11	18.11	0.0713	4,922	16	0.079	0.0000
NDU2	L-204B	Burner Gas Coalescer	Burner Gas Coalescer	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0001	8	16	0.000	0.0000
NDU2	L-204B	Burner Gas Coalescer	Burner Gas Coalescer	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	9	1	0.000	0.0000
NDU2	L-204A	Burner Gas Coalescer	Burner Gas Coalescer	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0001	8	16	0.000	0.0000
NDU2	L-204A	Burner Gas Coalescer	Burner Gas Coalescer	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	9	1	0.000	0.0000

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Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
NDU2	F-207	Fuel Gas KO Drum	Fuel Gas KO Drum	X			X						X	9,087	30,897
NDU2	Pilot Gas (NG) KO LG 238	Pilot Gas (NG) KO	Pilot Gas (NG) KO	X			X						X	114	454
OMCC	Bz/Naphtha Tanks	Bz/Naphtha Tanks	All Benzene/Naphtha Tank Water Draws to Tank 118/117	X			X						X	24,388,291	20,995
OMCC	Crude Tanks	Crude Tanks	All Crude Tank Water Draws to Tank 1046 or Tank 1048 Decant Tanks	X			X						X	148,286,668	4,127,567
OMCC	Diesel Blend Header Samples	Diesel Blend Header Samples	Diesel Blend Header Samples to Knock Engine Lab Sump		X		X						X	0	829
OMCC	Distillate Tanks	Distillate Tanks	All Distillate Tank Water Draws to Tank 66 Decant Tank		X		X						X	15,029,005	395,092
OMCC	Distillate Tanks	Distillate Tanks	All Distillate Tank Water Draws to Tank 67 Decant Tank		X		X						X	18,602,392	489,032
OMCC	Gasoline Tanks	Gasoline Tanks	All Gasoline Tank Water Draws to Tank 105 & 106	X			X						X	57,627,989	0
OMCC	LS 1 Pump	Lift Station No. 1 Dry Weather Pump	Lift Station No. 1 Dry Weather Pump Screen Cleaning to Pad/Sump		X		X						X	2,155,953	0
OMCC	LS 2 Pump	Lift Station No. 2 Dry Weather Pump	Lift Station No. 2 Dry Weather Pump Screen Cleaning to		X		X						X	3,233,930	0
OMCC	LS 3 Pump	Lift Station No. 3 Dry Weather Pump	Lift Station No. 3 Dry Weather Pump Screen Cleaning to Pad/Sump		X		X						X	2,155,953	0
OMCC	NA	18" Pipeline Station	Pump Seal Failure Maintenance		X		X						X	0	1,177
OMCC	NA	18" Pipeline Station	Gravity Sampling		X		X						X	0	3,442
OMCC	NA	Crude Meter Station #2	Pig Waste		X		X						X	0	19,221
OMCC	NA	Port Blvd Crude Meter Station	Sample Pots		X		X						X	0	3,544
OMCC	NA	Crude Meter Station #3	Sample Pots	X			X						X	0	3,544
OMCC	NA	Port Blvd Crude Meter Station	Prover Maintenance		X		X						X	0	7,156

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
NDU2	F-207	Fuel Gas KO Drum	Fuel Gas KO Drum	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0006	40	16	0.001	0.0000
NDU2	Pilot Gas (NG) KO LG 238	Pilot Gas (NG) KO	Pilot Gas (NG) KO	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	1	0	0.000	0.0000
OMCC	Bz/Naphtha Tanks	Bz/Naphtha Tanks	All Benzene/Naphtha Tank Water Draws to Tank 118/117 Decant Tanks	1500.00	2500.00	2000.00	48.777	513500.00	516500.00	515000.00	10.8124	24,409	2,441	59.589	0.0000
OMCC	Crude Tanks	Crude Tanks	All Crude Tank Water Draws to Tank 1046 or Tank 1048 Decant Tanks	7.13	24.05	12.20	1.8091	713.00	2405.00	1220.00	5.0356	152,414	45	6.845	0.0000
OMCC	Diesel Blend Header Samples	Diesel Blend Header Samples	Diesel Blend Header Samples to Knock Engine Lab Sump	0.00	10.00	5.00	0.0000	200.00	420.00	310.00	0.0003	1	310	0.000	0.0003
OMCC	Distillate Tanks	Distillate Tanks	All Distillate Tank Water Draws to Tank 66 Decant Tank	0.52	0.86	0.69	0.0104	0.53	0.88	0.70	0.0003	15,424	1	0.011	0.0106
OMCC	Distillate Tanks	Distillate Tanks	All Distillate Tank Water Draws to Tank 67 Decant Tank	0.52	0.86	0.69	0.0128	0.51	0.85	0.68	0.0003	19,091	1	0.013	0.0132
OMCC	Gasoline Tanks	Gasoline Tanks	All Gasoline Tank Water Draws to Tank 105 & 106 Decant Tanks	16.00	287.00	69.87	4.0265	1600.00	28700.00	6987.00	0.0000	57,628	70	4.026	0.0000
OMCC	LS 1 Pump	Lift Station No. 1 Dry Weather Pump	Lift Station No. 1 Dry Weather Pump Screen Cleaning to Pad/Sump	0.01	1.30	0.12	0.0003	0.00	0.00	0.00	0.0000	2,156	0	0.000	0.0003
OMCC	LS 2 Pump	Lift Station No. 2 Dry Weather Pump	Lift Station No. 2 Dry Weather Pump Screen Cleaning to Pad/Sump	0.01	1.30	0.12	0.0004	0.00	0.00	0.00	0.0000	3,234	0	0.000	0.0004
OMCC	LS 3 Pump	Lift Station No. 3 Dry Weather Pump	Lift Station No. 3 Dry Weather Pump Screen Cleaning to Pad/Sump	0.01	1.30	0.12	0.0003	0.00	0.00	0.00	0.0000	2,156	0	0.000	0.0003
OMCC	NA	18" Pipeline Station	Pump Seal Failure Maintenance	0.00	0.00	0.00	0.0000	1600.00	28700.00	6987.00	0.0082	1	6,987	0.008	0.0082
OMCC	NA	18" Pipeline Station	Gravity Sampling	0.00	0.00	0.00	0.0000	1600.00	28700.00	6987.00	0.0241	3	6,987	0.024	0.0241
OMCC	NA	Crude Meter Station #2	Pig Waste	7.13	24.05	12.20	0.0000	713.00	2405.00	1220.00	0.0234	19	1,220	0.023	0.0234
OMCC	NA	Port Blvd Crude Meter Station	Sample Pots	7.13	24.05	12.20	0.0000	713.00	2405.00	1220.00	0.0043	4	1,220	0.004	0.0043
OMCC	NA	Crude Meter Station #3	Sample Pots	7.13	24.05	12.20	0.0000	713.00	2405.00	1220.00	0.0043	4	1,220	0.004	0.0000
OMCC	NA	Port Blvd Crude Meter Station	Prover Maintenance	7.13	24.05	12.20	0.0000	713.00	2405.00	1220.00	0.0087	7	1,220	0.009	0.0087

NOTE: Each line item is split across two pages.

Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
OMCC	NA	Crude Meter Station #3	Prover Maintenance	X			X						X	0	7,156
OMCC	NA	Crude Meter Station #2	Prover Water Draw Test		X		X						X	0	4,294
OMCC	NA	Port Blvd Crude Meter Station	Strainer Maintenance		X		X						X	0	5,725
OMCC	NA	Crude Meter Station #3	Strainer Maintenance	X			X						X	0	5,725
OMCC	NA	Crude Meter Station #2	Thermal RV Pot		X		X						X	0	1,717
OMCC	NA	Port Blvd Crude Meter Station	Pig waste		X		X						X	0	17,175
OMCC	NA	12" Pipeline Station	Sample Pots drainage		X		X						X	0	26,535
OMCC	NA	12" Pipeline Station	Pump Seal Failure Maintenance		X		X						X	0	636
OMCC	NA	12" Pipeline Station	Sampling		X		X						X	0	945
OMCC	Various Tanks	OMCC Tanks (Various)	Controlled waste generated by tank turnarounds	X						X			X	0	3,828,912
OMCC	Various Tanks	OMCC Tanks (Various)	Uncontrolled waste generated by tank turnarounds		X					X			X	0	0
OMCC - Blender	Blender Product Filters	Blender Product Filters	Blender Product Filters Change Outs	X			X		X				X	0	34
OMCC - Blender	D-2A, D-3A, D-6A, D-2R, D-3R, D-4R, D-5R	Proto Fuel Tanks	Knock Engine Proto Fuel Tank discharge to 1775	X			X						X	0	4,623
OMCC - Blender	D-4A, D-5A, D-7R	Proto Fuel Tanks	Knock Engine Proto Fuel Tank discharge to 1775	X			X						X	0	420
OMCC - Blender	Lab Knock Engines	Lab Knock Engines Sample	Lab Knock Engines Sample Overspill	X			X		X				X	0	276,128
OMCC - Blender	Lab Knock Engines	Knock Engine Motor Lube Oil Change Out.	Knock Engine Motor Lube Oil Change Out.	X			X		X				X	0	796
OMCC - Blender	Lab Knock Engines Product Filters	Lab Knock Engines Product Filters	Lab Knock Engines Product Filters Change-Outs	X			X		X				X	0	219

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ	Benzene Concentration (ppmw)			BQ				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.	(Mg/yr)	Min.	Max.	Avg.	(Mg/yr)				
OMCC	NA	Crude Meter Station #3	Prover Maintenance	7.13	24.05	12.20	0.0000	713.00	2405.00	1220.00	0.0087	7	1,220	0.009	0.0000
OMCC	NA	Crude Meter Station #2	Prover Water Draw Test	7.13	24.05	12.20	0.0000	713.00	2405.00	1220.00	0.0052	4	1,220	0.005	0.0052
OMCC	NA	Port Blvd Crude Meter Station	Strainer Maintenance	7.13	24.05	12.20	0.0000	713.00	2405.00	1220.00	0.0070	6	1,220	0.007	0.0070
OMCC	NA	Crude Meter Station #3	Strainer Maintenance	7.13	24.05	12.20	0.0000	713.00	2405.00	1220.00	0.0070	6	1,220	0.007	0.0000
OMCC	NA	Crude Meter Station #2	Thermal RV Pot	7.13	24.05	12.20	0.0000	713.00	2405.00	1220.00	0.0021	2	1,220	0.002	0.0021
OMCC	NA	Port Blvd Crude Meter Station	Pig waste	7.13	24.05	12.20	0.0000	713.00	2405.00	1220.00	0.0210	17	1,220	0.021	0.0210
OMCC	NA	12" Pipeline Station	Sample Pots drainage	0.00	10.00	5.00	0.0000	200.00	420.00	310.00	0.0082	27	310	0.008	0.0082
OMCC	NA	12" Pipeline Station	Pump Seal Failure Maintenance	0.00	10.00	5.00	0.0000	200.00	420.00	310.00	0.0002	1	310	0.000	0.0002
OMCC	NA	12" Pipeline Station	Sampling	0.00	10.00	5.00	0.0000	200.00	420.00	310.00	0.0003	1	310	0.000	0.0003
OMCC	Various Tanks	OMCC Tanks (Various)	Controlled waste generated by tank turnarounds	1.35	1.65	1.50	0.0000	135.00	165.00	150.00	0.5743	3,829	150	0.000	0.0000
OMCC	Various Tanks	OMCC Tanks (Various)	Uncontrolled waste generated by tank turnarounds				0.0000	0.00	0.00	0.00	0.0000	0	0	0.000	0.0000
OMCC - Blender	Blender Product Filters	Blender Product Filters	Blender Product Filters Change Outs	0.00	0.00	0.00	0.0000	1600.00	28700.00	6987.00	0.0002	0	6,987	0.000	0.0000
OMCC - Blender	D-2A, D-3A, D-6A, D-2R, D-3R, D-4R, D-5R	Proto Fuel Tanks	Knock Engine Proto Fuel Tank discharge to 1775	0.00	0.00	0.00	0.0000	1600.00	28700.00	6987.00	0.0323	5	6,987	0.032	0.0000
OMCC - Blender	D-4A, D-5A, D-7R	Proto Fuel Tanks	Knock Engine Proto Fuel Tank discharge to 1775	0.00	0.00	0.00	0.0000	1600.00	28700.00	6987.00	0.0029	0	6,987	0.003	0.0000
OMCC - Blender	Lab Knock Engines	Lab Knock Engines Sample	Lab Knock Engines Sample Overspill	0.00	0.00	0.00	0.0000	1600.00	28700.00	6987.00	1.9293	276	6,987	1.929	0.0000
OMCC - Blender	Lab Knock Engines	Knock Engine Motor Lube Oil Change Out.	Knock Engine Motor Lube Oil Change Out.	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	1	5	0.000	0.0000
OMCC - Blender	Lab Knock Engines Product Filters	Lab Knock Engines Product Filters	Lab Knock Engines Product Filters Change-Outs	0.00	0.00	0.00	0.0000	1600.00	28700.00	6987.00	0.0015	0	6,987	0.002	0.0000

NOTE: Each line item is split across two pages.

Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
OMCC - Blender	Stationary Building Knock Engines	Stationary Building Knock Engines Grab Samples	Knock Engine Grab Samples	X			X		X				X	1,106	9,409
OMCC - Blender	Stationary Building Knock Engines	Stationary Building Knock Engines	Knock Engine Motor Lube Oil Change Out.	X			X		X				X	0	398
Power Station No. 2	417-FA	Tail Gas Condensate Collection Pot	417-FA Drain to Light Slop Header	X			X						X	803,895	7,146
Power Station No. 2	E-2001	Back Up Fuel Gas Scrubber	Back Up Fuel Gas Scrubber to Slop Line	X			X						X	43,534	30,474
Power Station No. 2	E-2002	Primary Fuel Gas Scrubber	Primary Fuel Gas Scrubber Oil Skims to Light Slop	X			X						X	0	772
Power Station No. 2	F-2011	F-2011 Fuel Gas K.O. Drum	F-2011 Fuel Gas K.O. Drum to Slop Line	X			X						X	13,820	9,674
Power Station No. 2	F-2012	F-2012 Fuel Gas K.O. Drum	F-2012 Fuel Gas K.O. Drum to Slop Line	X			X						X	13,820	9,674
Power Station No. 2	F-3317B	Fuel Gas Drip Drum	Fuel Gas Drip Drum Drain to Slop Line	X			X						X	13,820	9,674
Power Station No. 2	F-410	J-425 First Stage Pumpout Pot	J-425 First Stage Pumpout Pot Liquid Drain to Light Slop Header	X			X						X	0	616,095
Power Station No. 2	F-410A	J-426 First Stage Pumpout Pot	J-426 First Stage Pumpout Pot Liquid Drain to Light Slop Header	X			X						X	0	649,397

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ	Benzene Concentration (ppmw)			BQ				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.	(Mg/yr)	Min.	Max.	Avg.	(Mg/yr)				
OMCC - Blender	Stationary Building Knock Engines	Stationary Building Knock Engines Grab Samples	Knock Engine Grab Samples	0.00	0.00	0.00	0.0000	1600.00	28700.00	6987.00	0.0657	11	6,252	0.066	0.0000
OMCC - Blender	Stationary Building Knock Engines	Stationary Building Knock Engines	Knock Engine Motor Lube Oil Change Out.	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
Power Station No. 2	417-FA	Tail Gas Condensate Collection Pot	417-FA Drain to Light Slop Header	7.20	8.80	8.00	0.0064	720.00	880.00	800.00	0.0057	811	15	0.012	0.0000
Power Station No. 2	E-2001	Back Up Fuel Gas Scrubber	Back Up Fuel Gas Scrubber to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0006	74	9	0.001	0.0000
Power Station No. 2	E-2002	Primary Fuel Gas Scrubber	Primary Fuel Gas Scrubber Oil Skims to Light Slop	0.00	0.00	1.17	0.0000	8775.00	14625.00	11700.00	0.0090	1	11,700	0.009	0.0000
Power Station No. 2	F-2011	F-2011 Fuel Gas K.O. Drum	F-2011 Fuel Gas K.O. Drum to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000
Power Station No. 2	F-2012	F-2012 Fuel Gas K.O. Drum	F-2012 Fuel Gas K.O. Drum to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000
Power Station No. 2	F-3317B	Fuel Gas Drip Drum	Fuel Gas Drip Drum Drain to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000
Power Station No. 2	F-410	J-425 First Stage Pumpout Pot	J-425 First Stage Pumpout Pot Liquid Drain to Light Slop Header	0.00	0.00	1.17	0.0000	8775.00	14625.00	11700.00	7.2083	616	11,700	7.208	0.0000
Power Station No. 2	F-410A	J-426 First Stage Pumpout Pot	J-426 First Stage Pumpout Pot Liquid Drain to Light Slop Header	0.00	0.00	1.17	0.0000	8775.00	14625.00	11700.00	7.5979	649	11,700	7.598	0.0000

NOTE: Each line item is split across two pages.

Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit (Show A)	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
Power Station No. 2	F-410B	J-427 1st Stage Knockout Drum	Liquids pumped to light slop header.	X			X						X	0	1,459,415
Power Station No. 2	F-410C	J-428 1st Stage Knockout Drum	Liquids pumped to light slop header.	X			X						X	0	1,459,415
Power Station No. 2	F-415	J-425 Pumpout Drum	J-425 Pumpout Drum Liquid Drain to Light Slop Header	X			X						X	0	28,936
Power Station No. 2	F-415A	J-426 Pumpout Drum	J-426 Pumpout Drum Liquid Drain to Light Slop Header	X			X						X	0	28,936
Power Station No. 2	F-420	J-425 Second Stage Pumpout Pot	J-425 Second Stage Pumpout Pot Liquid Drain to Light Slop Header	X			X						X	0	299,574
Power Station No. 2	F-425	J-425 Pumpout Drum	J-425 Pumpout Drum Liquid Drain to Light Slop Header	X			X						X	0	28,936
Power Station No. 2	F-425A	J-426 Pumpout Drum	J-426 Pumpout Drum Liquid Drain to Light Slop Header	X			X						X	0	28,936
Power Station No. 2	F-476	Cylinder Drain Pot	Cylinder Drain Pot Liquids to Light Slop Header	X			X						X	0	7,924
Power Station No. 2	F-801	Flare #1 K.O. Drum	Flare #1 K.O. Drum Drain to Light Slop Line	X			X						X	0	730,716

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
Power Station No. 2	F-410B	J-427 1st Stage Knockout Drum	Liquids pumped to light slop header.	1.35	1.65	1.50	0.0000	135.00	165.00	150.00	0.2189	1,459	150	0.219	0.0000
Power Station No. 2	F-410C	J-428 1st Stage Knockout Drum	Liquids pumped to light slop header.	1.35	1.65	1.50	0.0000	135.00	165.00	150.00	0.2189	1,459	150	0.219	0.0000
Power Station No. 2	F-415	J-425 Pumpout Drum	J-425 Pumpout Drum Liquid Drain to Light Slop Header	0.00	0.00	1.17	0.0000	8775.00	14625.00	11700.00	0.3386	29	11,700	0.339	0.0000
Power Station No. 2	F-415A	J-426 Pumpout Drum	J-426 Pumpout Drum Liquid Drain to Light Slop Header	0.00	0.00	1.17	0.0000	8775.00	14625.00	11700.00	0.3386	29	11,700	0.339	0.0000
Power Station No. 2	F-420	J-425 Second Stage Pumpout Pot	J-425 Second Stage Pumpout Pot Liquid Drain to Light Slop Header	1.35	1.65	1.50	0.0000	135.00	165.00	150.00	0.0449	300	150	0.045	0.0000
Power Station No. 2	F-425	J-425 Pumpout Drum	J-425 Pumpout Drum Liquid Drain to Light Slop Header	0.00	0.00	1.17	0.0000	8775.00	14625.00	11700.00	0.3386	29	11,700	0.339	0.0000
Power Station No. 2	F-425A	J-426 Pumpout Drum	J-426 Pumpout Drum Liquid Drain to Light Slop Header	0.00	0.00	1.17	0.0000	8775.00	14625.00	11700.00	0.3386	29	11,700	0.339	0.0000
Power Station No. 2	F-476	Cylinder Drain Pot	Cylinder Drain Pot Liquids to Light Slop Header	0.00	0.00	0.01	0.0000	87.75	146.25	117.00	0.0009	8	117	0.001	0.0000
Power Station No. 2	F-801	Flare #1 K.O. Drum	Flare #1 K.O. Drum Drain to Light Slop Line	0.00	0.00	0.00	0.0000	2.50	4.90	3.30	0.0024	731	3	0.002	0.0000

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Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
Power Station No. 2	F-801B	F-801 Light Slop Drip Pot (Peanut Pot)	Flare #1 Drip Pot Drain to Light Slop Line	X			X						X	0	1,106
Power Station No. 2	F-802	Flare K.O. Drum	Flare K.O. Drum Drain to Light Slop Line	X			X						X	0	144,682
Power Station No. 2	F-803/ 803A	Flare #3 K.O. Drum	Flare #3 K.O Drum Drain to Slop Line	X			X						X	0	372,715
Power Station No. 2	F-804	Flare #4 K.O. Drum	Flare #4 K.O. Drain to Slop Line	X			X						X	0	243,075
Power Station No. 2	F-807	F-807 ALKY 2 K.O. Drum	ALKY 2 K.O. Drum to Light Slop	X							X		X	0	575,056
Power Station No. 2	F-808	F-808 Cat #3 K.O. Drum	F-808 Cat #3 K.O. Drum to Light Slop	X			X						X	0	13,517
Power Station No. 2	F-811	Absorber Gas K.O. Drum	F-811 Absorber Gas K.O. Drum to Sour Water System	X			X						X	284	83
~~Power Station No. 2~~	~~F-813~~	~~F-813 Fuel Gas K.O. Drum~~	~~F-813 Fuel Gas K.O. Drum to Slop Line~~	~~X~~			~~X~~						~~X~~	~~13,820~~	~~9,674~~
Power Station No. 2	F-814	F-814 Fuel Gas K.O. Drum	F-814 Fuel Gas K.O. Drum to Slop Line	X			X						X	13,820	9,674
Power Station No. 2	F-815	F-815 Fuel Gas K.O. Drum	F-815 Fuel Gas K.O. Drum to Slop Line	X			X						X	13,820	9,674

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
Power Station No. 2	F-801B	F-801 Light Slop Drip Pot (Peanut Pot)	Flare #1 Drip Pot Drain to Light Slop Line	0.00	0.00	0.00	0.0000	2.50	4.90	3.30	0.0000	1	3	0.000	0.0000
Power Station No. 2	F-802	Flare K.O. Drum	Flare K.O. Drum Drain to Light Slop Line	1.35	1.65	1.50	0.0000	135.00	165.00	150.00	0.0217	145	150	0.022	0.0000
Power Station No. 2	F-803/ 803A	Flare #3 K.O. Drum	Flare #3 K.O Drum Drain to Slop Line	8.25	13.75	11.00	0.0000	5475.00	9125.00	7300.00	2.7208	373	7,300	2.721	0.0000
Power Station No. 2	F-804	Flare #4 K.O. Drum	Flare #4 K.O. Drain to Slop Line	8.25	13.75	11.00	0.0000	5475.00	9125.00	7300.00	1.7744	243	7,300	1.774	0.0000
Power Station No. 2	F-807	F-807 ALKY 2 K.O. Drum	ALKY 2 K.O. Drum to Light Slop	0.00	0.00	0.00	0.0000	45.75	76.25	61.00	0.0351	575	61	0.035	0.0000
Power Station No. 2	F-808	F-808 Cat #3 K.O. Drum	F-808 Cat #3 K.O. Drum to Light Slop	8.25	13.75	11.00	0.0000	5475.00	9125.00	7300.00	0.0987	14	7,300	0.099	0.0000
Power Station No. 2	F-811	Absorber Gas K.O. Drum	F-811 Absorber Gas K.O. Drum to Sour Water System	1.35	1.65	1.50	0.0000	135.00	165.00	150.00	0.0000	0	35	0.000	0.0000
~~Power Station No. 2~~	~~F-813~~	~~F-813 Fuel Gas K.O. Drum~~	~~F-813 Fuel Gas K.O. Drum to Slop Line~~	0.07	0.32	0.21	~~0.0000~~	6.80	32.00	20.60	~~0.0002~~	~~23~~	~~9~~	~~0.000~~	~~0.0000~~
Power Station No. 2	F-814	F-814 Fuel Gas K.O. Drum	F-814 Fuel Gas K.O. Drum to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000
Power Station No. 2	F-815	F-815 Fuel Gas K.O. Drum	F-815 Fuel Gas K.O. Drum to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000

NOTE: Each line item is split across two pages.

Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
Power Station No. 2	F-817	F-817 Fuel Gas K.O. Drum	F-817 Fuel Gas K.O. Drum to Slop Line	X			X						X	13,820	9,674
Power Station No. 2	F-818	F-818 Fuel Gas K.O. Drum	F-818 Fuel Gas K.O. Drum to Slop Line	X			X						X	13,820	9,674
Power Station No. 2	F-819	F-819 Fuel Gas K.O. Drum	F-819 Fuel Gas K.O. Drum to Slop Line	X			X						X	13,820	9,674
Power Station No. 2	F-825	F-825 Fuel Gas K.O. Drum	F-825 Fuel Gas K.O. Drum to Slop Line	X			X						X	13,820	9,674
Power Station No. 2	F-826	F-826 Fuel Gas K.O. Drum	F-826 Fuel Gas K.O. Drum to Slop Line	X			X						X	13,820	9,674
Power Station No. 2	F-831	F-831 Fuel Gas K.O Drum	F-831 Fuel Gas K.O. Drum to Slop Line	X			X						X	13,820	9,674
Power Station No. 2	F-833	F-833 Fuel Gas K.O. Drum	F-833 Fuel Gas K.O. Drum to Slop Line	X			X						X	13,820	9,674
Power Station No. 2	F-835	F-835 Fuel Gas K.O. Drum	F-835 Fuel Gas K.O. Drum to Slop Line	X			X						X	13,820	9,674
~~Power Station No. 2~~	~~F-837~~	~~F-837 Fuel Gas K.O. Drum~~	~~F-837 Fuel Gas K.O. Drum to Slop Line~~	~~X~~			~~X~~						~~X~~	~~13,820~~	~~9,674~~
Power Station No. 2	F-839	F-839 Fuel Gas K.O. Drum	F-839 Fuel Gas K.O. Drum to Slop Line	X			X						X	13,820	9,674
Power Station No. 2	F-840	F-840 Fuel Gas K.O. Drum	F-840 Fuel Gas K.O. Drum to Slop Line	X			X						X	13,820	9,674

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
Power Station No. 2	F-817	F-817 Fuel Gas K.O. Drum	F-817 Fuel Gas K.O. Drum to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000
Power Station No. 2	F-818	F-818 Fuel Gas K.O. Drum	F-818 Fuel Gas K.O. Drum to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000
Power Station No. 2	F-819	F-819 Fuel Gas K.O. Drum	F-819 Fuel Gas K.O. Drum to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000
Power Station No. 2	F-825	F-825 Fuel Gas K.O. Drum	F-825 Fuel Gas K.O. Drum to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000
Power Station No. 2	F-826	F-826 Fuel Gas K.O. Drum	F-826 Fuel Gas K.O. Drum to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000
Power Station No. 2	F-831	F-831 Fuel Gas K.O Drum	F-831 Fuel Gas K.O. Drum to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000
Power Station No. 2	F-833	F-833 Fuel Gas K.O. Drum	F-833 Fuel Gas K.O. Drum to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000
Power Station No. 2	F-835	F-835 Fuel Gas K.O. Drum	F-835 Fuel Gas K.O. Drum to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000
~~Power Station No. 2~~	~~F-837~~	~~F-837 Fuel Gas K.O. Drum~~	~~F-837 Fuel Gas K.O. Drum to Slop Line~~	0.07	0.32	0.21	~~0.0000~~	6.80	32.00	20.60	~~0.0002~~	~~23~~	~~9~~	~~0.000~~	~~0.0000~~
Power Station No. 2	F-839	F-839 Fuel Gas K.O. Drum	F-839 Fuel Gas K.O. Drum to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000
Power Station No. 2	F-840	F-840 Fuel Gas K.O. Drum	F-840 Fuel Gas K.O. Drum to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
Power Station No. 2	F-841	F-841 Fuel Gas K.O. Drum	F-841 Fuel Gas K.O. Drum to Slop Line	X			X						X	13,820	9,674
Power Station No. 2	F-842	F-842 Fuel Gas K.O. Drum	F-842 Fuel Gas K.O. Drum to Slop Line	X			X						X	13,820	9,674
Power Station No. 2	F-859	F-859 Fuel Gas K.O. Drum	F-859 Fuel Gas K.O. Drum to Slop Line	X			X						X	13,820	9,674
Power Station No. 2	F-868	Slug Catcher	Liquids pumped to light slop header.	X			X						X	0	4,378,244
Power Station No. 2	FG-01		FG-01 to Slop	X			X						X	3,692	3,138
Power Station No. 2	FG-02		FG-02 to Slop	X			X						X	3,692	3,138
Power Station No. 2	FG-05		FG-05 to Slop	X			X						X	3,692	3,138
Power Station No. 2	Fuel Gas K.O. Drum Near Coker	Fuel Gas K.O. Drum Near Coker	Fuel Gas K.O. Drum Near Coker to Slop Line	X			X						X	13,820	9,674

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
Power Station No. 2	F-841	F-841 Fuel Gas K.O. Drum	F-841 Fuel Gas K.O. Drum to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000
Power Station No. 2	F-842	F-842 Fuel Gas K.O. Drum	F-842 Fuel Gas K.O. Drum to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000
Power Station No. 2	F-859	F-859 Fuel Gas K.O. Drum	F-859 Fuel Gas K.O. Drum to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000
Power Station No. 2	F-868	Slug Catcher	Liquids pumped to light slop header.	1.35	1.65	1.50	0.0000	135.00	165.00	150.00	0.6567	4,378	150	0.657	0.0000
Power Station No. 2	FG-01		FG-01 to Slop	0.00	0.00	1.17	0.0000	8775.00	14625.00	11700.00	0.0367	7	5,376	0.037	0.0000
Power Station No. 2	FG-02		FG-02 to Slop	0.00	0.00	1.17	0.0000	8775.00	14625.00	11700.00	0.0367	7	5,376	0.037	0.0000
Power Station No. 2	FG-05		FG-05 to Slop	0.00	0.00	1.17	0.0000	8775.00	14625.00	11700.00	0.0367	7	5,376	0.037	0.0000
Power Station No. 2	Fuel Gas K.O. Drum Near Coker	Fuel Gas K.O. Drum Near Coker	Fuel Gas K.O. Drum Near Coker to Slop Line	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	23	9	0.000	0.0000

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Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
Power Station No. 2	J-426	J-426 Vent Gas Compressor	J-426 Vent Gas Compressor Lube Oil Drains to J-426 Sump		X		X						X	0	297
Power Station No. 2	J-426 Cylinder Drain Pot	J-426 Cylinder Drain Pot	J-426 Cylinder Drain Pot to J-426 Sump		X		X						X	0	1,678
Power Station No. 2	L-402/ 402A	Lube Oil Filters	Lube Oil Filter Changeout Waste to Used Oil Tote	X			X						X	0	593
Power Station No. 2	L-403A/B	Lube Oil Filters	Lube Oil Filter Changeout Waste to Used Oil Tote	X			X						X	0	638
Power Station No. 2	N/A	J-724B Air Compressor Lube Oil Filters	J-724B Air Compressor Lube Oil Filter Changeout to Used Oil Tote	X			X						X	0	16
Power Station No. 2	N/A	J-724A Air Compressor Lube Oil Filters	J-724A Air Compressor Lube Oil Filter Changeouts to Used Oil Tote	X			X						X	0	16
Power Station No. 2	N/A	J-724C Air Compressor Lube Oil Filters	J-724C Air Compressor Lube Oil Filter Changeouts to Used Oil Tote	X			X						X	0	16
Power Station No. 2	N/A	J-406 Lubricator Filters	J-406 Lubricator Filter Changeout Waste to Used Oil Tote	X			X						X	0	17
Power Station No. 2	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to J-426 Sump		X		X						X	0	64
Power Station No. 2	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer		X		X						X	0	64
Power Station No. 2	NA	Lube Oil Filters	J-427 Lube Oil Filter Changeout Waste to Used Oil Tote	X			X						X	0	1,780
Power Station No. 2	NA	Lube Oil Filters	J-428 Lube Oil Filter Changeout Waste to Used Oil Tote	X			X						X	0	1,780
Power Station No. 2	NA	Modular Lube Oil Drum	Modular Lube Oil Drum Drips to J-426 Sump		X		X						X	0	85
Power Station No. 2	Sour Water pH Bleeder	Sour Water pH Bleeder	Sour Water pH Bleeder Line to East/West Sump		X		X						X	0	0
Power Station No. 2	TK-132	Caustic Tank 132	Tank 132 Oil Check Lines to West Sump		X		X						X	0	0

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
Power Station No. 2	J-426	J-426 Vent Gas Compressor	J-426 Vent Gas Compressor Lube Oil Drains to J-426 Sump	0.00	0.00	0.01	0.0000	87.75	146.25	117.00	0.0000	0	117	0.000	0.0000
Power Station No. 2	J-426 Cylinder Drain Pot	J-426 Cylinder Drain Pot	J-426 Cylinder Drain Pot to J-426 Sump	0.00	0.00	1.17	0.0000	8775.00	14625.00	11700.00	0.0196	2	11,700	0.020	0.0196
Power Station No. 2	L-402/ 402A	Lube Oil Filters	Lube Oil Filter Changeout Waste to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	1	5	0.000	0.0000
Power Station No. 2	L-403A/B	Lube Oil Filters	Lube Oil Filter Changeout Waste to Used Oil Tote	0.00	0.00	0.01	0.0000	87.75	146.25	117.00	0.0001	1	117	0.000	0.0000
Power Station No. 2	N/A	J-724B Air Compressor Lube Oil Filters	J-724B Air Compressor Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
Power Station No. 2	N/A	J-724A Air Compressor Lube Oil Filters	J-724A Air Compressor Lube Oil Filter Changeouts to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
Power Station No. 2	N/A	J-724C Air Compressor Lube Oil Filters	J-724C Air Compressor Lube Oil Filter Changeouts to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
Power Station No. 2	N/A	J-406 Lubricator Filters	J-406 Lubricator Filter Changeout Waste to Used Oil Tote	0.00	0.00	0.01	0.0000	87.75	146.25	117.00	0.0000	0	117	0.000	0.0000
Power Station No. 2	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to J-426 Sump	0.00	0.00	1.17	0.0000	8775.00	14625.00	11700.00	0.0008	0	11,700	0.001	0.0008
Power Station No. 2	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	0.00	0.00	1.17	0.0000	8775.00	14625.00	11700.00	0.0008	0	11,700	0.001	0.0008
Power Station No. 2	NA	Lube Oil Filters	J-427 Lube Oil Filter Changeout Waste to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	2	5	0.000	0.0000
Power Station No. 2	NA	Lube Oil Filters	J-428 Lube Oil Filter Changeout Waste to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	2	5	0.000	0.0000
Power Station No. 2	NA	Modular Lube Oil Drum	Modular Lube Oil Drum Drips to J-426 Sump	0.00	0.00	0.01	0.0000	87.75	146.25	117.00	0.0000	0	117	0.000	0.0000
Power Station No. 2	Sour Water pH Bleeder	Sour Water pH Bleeder	Sour Water pH Bleeder Line to East/West Sump	10.50	17.50	14.00	0.0000	3750.00	6250.00	5000.00	0.0000	0	0	0.000	0.0000
Power Station No. 2	TK-132	Caustic Tank 132	Tank 132 Oil Check Lines to West Sump	9.00	15.00	12.00	0.0000	3750.00	6250.00	5000.00	0.0000	0	0	0.000	0.0000

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Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit (Show A)	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
Power Station No. 2	TK-159 TK-133	Filtered Water Tanks 159 and 133	Tank 159/133 Level Check Lines		X		X						X	0	0
Power Station No. 2	TK-160	Unfiltered Water Tank 160	Tank 160 Oil Check Lines to Uncontrolled East Sump		X		X						X	0	0
Power Station No. 2	TK-161 TK-134	Oil Skimmer Tanks 161 and 134	Tank 161/134 Oil Skim Check Lines		X		X						X	0	0
Power Station No. 2	TK-222 TK-223	Skimmed Oil Tanks 222 and 223	Tank 222/223 Oil Check Lines to West Sump		X		X						X	0	0
PS3A	101-FA	Crude Desalter	Crude Desalter Brine Water to Above Ground Oily Water Separator	X		X							X	343,045,352	5,224,041
PS3A	101-FB	Crude Desalter	Crude Desalter Brine Water to Above Ground Oily Water Separator	X		X							X	343,045,352	5,224,041
PS3A	107-F	Fuel Gas Knock Out Drum	Fuel Gas Knock Out Drum Drain to Oily Water Sewer	X			X						X	10,365	8,810
PS3A	117-F	Kerosene Salt Coalescer	Kerosene Salt Coalescer to Above Ground Oily Water Separator	X		X							X	41,983	373
PS3A	120-F	Fuel Gas Knock Out Drum	Fuel Gas Knock Out Drum Drain to Oily Water Sewer	X			X						X	11,517	9,789
PS3A	190-LA/LB	Gland Oil Filters	Gland Oil Filters Backflush	X			X		X				X	0	31,987
PS3A	311-F	Caustic Prewash	Caustic Prewash to Caustic Settling Drum	X			X						X	35,573,231	215,595
PS3A	325-F	Diesel Precipitator	Diesel Precipitator Drain to Above Ground Oily Water Separator	X			X						X	41,983	339
PS3A	350-F	Flare Knock Out Drum	Knock Out Drum Drain to Slop Header	X			X						X	0	323,503,569
PS3A	501-SA/SB	LVGO Reflux Strainers	LVGO Reflux Strainers Cleanout to OWS (w/ CC)	X			X		X				X	0	67

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
Power Station No. 2	TK-159 TK-133	Filtered Water Tanks 159 and 133	Tank 159/133 Level Check Lines	10.50	17.50	14.00	0.0000	3750.00	6250.00	5000.00	0.0000	0	0	0.000	0.0000
Power Station No. 2	TK-160	Unfiltered Water Tank 160	Tank 160 Oil Check Lines to Uncontrolled East Sump	10.50	17.50	14.00	0.0000	3750.00	6250.00	5000.00	0.0000	0	0	0.000	0.0000
Power Station No. 2	TK-161 TK-134	Oil Skimmer Tanks 161 and 134	Tank 161/134 Oil Skim Check Lines	10.50	17.50	14.00	0.0000	3750.00	6250.00	5000.00	0.0000	0	0	0.000	0.0000
Power Station No. 2	TK-222 TK-223	Skimmed Oil Tanks 222 and 223	Tank 222/223 Oil Check Lines to West Sump	9.00	15.00	12.00	0.0000	3750.00	6250.00	5000.00	0.0000	0	0	0.000	0.0000
PS3A	101-FA	Crude Desalter	Crude Desalter Brine Water to Above Ground Oily Water Separator	24.10	26.10	25.10	8.6104	0.01	27794.00	2405.00	12.5638	348,269	61	21.174	0.0000
PS3A	101-FB	Crude Desalter	Crude Desalter Brine Water to Above Ground Oily Water Separator	24.10	26.10	25.10	8.6104	0.01	27794.00	2405.00	12.5638	348,269	61	21.174	0.0000
PS3A	107-F	Fuel Gas Knock Out Drum	Fuel Gas Knock Out Drum Drain to Oily Water Sewer	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	19	10	0.000	0.0000
PS3A	117-F	Kerosene Salt Coalescer	Kerosene Salt Coalescer to Above Ground Oily Water Separator	1.00	10.00	3.25	0.0001	100.00	1000.00	325.00	0.0001	42	6	0.000	0.0000
PS3A	120-F	Fuel Gas Knock Out Drum	Fuel Gas Knock Out Drum Drain to Oily Water Sewer	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0002	21	10	0.000	0.0000
PS3A	190-LA/LB	Gland Oil Filters	Gland Oil Filters Backflush	0.05	0.72	0.23	0.0000	5.00	72.00	23.00	0.0007	32	23	0.001	0.0000
PS3A	311-F	Caustic Prewash	Caustic Prewash to Caustic Settling Drum	7.50	12.50	10.00	0.3557	3267.00	3993.00	3630.00	0.7826	35,789	32	1.138	0.0000
PS3A	325-F	Diesel Precipitator	Diesel Precipitator Drain to Above Ground Oily Water Separator	0.50	1.00	0.75	0.0000	50.00	100.00	75.00	0.0000	42	1	0.000	0.0000
PS3A	350-F	Flare Knock Out Drum	Knock Out Drum Drain to Slop Header	1.35	1.65	1.50	0.0000	135.00	165.00	150.00	48.5255	323,504	150	48.526	0.0000
PS3A	501-SA/SB	LVGO Reflux Strainers	LVGO Reflux Strainers Cleanout to OWS (w/ CC)	0.05	0.72	0.23	0.0000	5.00	72.00	23.00	0.0000	0	23	0.000	0.0000

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Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
PS3A	502-SA/SB	HVGO Reflux Strainers	HVGO Reflux Strainers Cleanout to OWS (w/CC)	X			X		X				X	0	67
PS3A	504-STR/505-STR	Fuel Gas Strainers	Fuel Gas Strainers Cleanout to OWS(w/CC)	X			X		X				X	0	335
PS3A	506-STR/507-STR	Fuel Gas Strainers	Fuel Gas Strainers Cleanout to OWS(w/CC)	X			X		X				X	0	335
PS3A	Hot Belt Filters	Hot Belt Filters	Hot Belt Filter Changeouts	X			X		X				X	45	360
PS3A	L-314	Fuel Gas Coalescer	Coalescer to Slop Header	X			X						X	98	87
PS3A	Misc. Sight Glass Level Gauge draining	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	X			X						X	0	61
PS3A	PS3 Cooling Tower	PS3 Cooling Tower	PS3 Cooling Tower Blowdown		X	X							X	435,834,269	0
PS3A	RV Sampling Station	RV Sampling Station	RV Sampling Station to Oily Water Sewer	X			X						X	0	6
PS3B	401-F	Overhead Reflux Drum	401-F Drain to Above-Ground Oily Water Separator	X			X						X	15,059,959	133,866
PS3B	401-LA	1st Stage Desalter	401-LA Desalter Brine Water to Above-Ground Oily Water Separator	X		X							X	560,307,408	7,679,340
PS3B	401-LA	1st Stage Desalter	401-LA Desalter Rag Layer Checks to Sample Panel to Cold KO Drum	X			X						X	41,461	111,944
PS3B	401-LB	2nd Stage Desalter	401-LB Desalter Rag Layer Checks to Sample Panel to Cold KO Drum	X			X						X	41,461	111,944
PS3B	402-E	Stripper Tower	Heavy Straight Run Naphtha Color Check to Oily Water Sewer	X			X						X	0	3,524
PS3B	402-E	Stripper Tower	Naphtha Color Check to Oily Water Sewer	X			X						X	0	3,649

NOTE: Each line item is split across two pages.

Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
PS3A	502-SA/SB	HVGO Reflux Strainers	HVGO Reflux Strainers Cleanout to OWS (w/CC)	0.05	4.06	1.44	0.0000	5.00	406.00	144.00	0.0000	0	144	0.000	0.0000
PS3A	504-STR/505-STR	Fuel Gas Strainers	Fuel Gas Strainers Cleanout to OWS(w/CC)	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	0	21	0.000	0.0000
PS3A	506-STR/507-STR	Fuel Gas Strainers	Fuel Gas Strainers Cleanout to OWS(w/CC)	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	0	21	0.000	0.0000
PS3A	Hot Belt Filters	Hot Belt Filters	Hot Belt Filter Changeouts	0.05	4.06	1.44	0.0000	5.00	406.00	144.00	0.0001	0	128	0.000	0.0000
PS3A	L-314	Fuel Gas Coalescer	Coalescer to Slop Header	1.35	1.65	1.50	0.0000	135.00	165.00	150.00	0.0000	0	71	0.000	0.0000
PS3A	Misc. Sight Glass Level Gauge draining	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	50.00	150.00	300.00	0.0000	5000.00	15000.00	30000.00	0.0018	0	30,000	0.002	0.0000
PS3A	PS3 Cooling Tower	PS3 Cooling Tower	PS3 Cooling Tower Blowdown	0.00	0.00	0.00	0.0004	0.00	0.00	0.00	0.0000	435,834	0	0.000	0.0004
PS3A	RV Sampling Station	RV Sampling Station	RV Sampling Station to Oily Water Sewer	50.00	150.00	300.00	0.0000	5000.00	15000.00	30000.00	0.0002	0	30,000	0.000	0.0000
PS3B	401-F	Overhead Reflux Drum	401-F Drain to Above-Ground Oily Water Separator	0.99	87.03	18.73	0.2821	21600.00	26400.00	24000.00	3.2128	15,194	230	3.495	0.0000
PS3B	401-LA	1st Stage Desalter	401-LA Desalter Brine Water to Above-Ground Oily Water Separator	0.66	36.73	11.67	6.5388	0.01	13593.00	713.00	5.4754	567,987	21	12.014	0.0000
PS3B	401-LA	1st Stage Desalter	401-LA Desalter Rag Layer Checks to Sample Panel to Cold KO Drum	0.66	36.73	11.67	0.0005	0.01	13593.00	713.00	0.0798	153	523	0.080	0.0000
PS3B	401-LB	2nd Stage Desalter	401-LB Desalter Rag Layer Checks to Sample Panel to Cold KO Drum	0.59	31.08	11.29	0.0005	0.01	13593.00	713.00	0.0798	153	523	0.080	0.0000
PS3B	402-E	Stripper Tower	Heavy Straight Run Naphtha Color Check to Oily Water Sewer	0.00	0.00	0.00	0.0000	400.00	102600.00	2416.00	0.0085	4	2,416	0.009	0.0000
PS3B	402-E	Stripper Tower	Naphtha Color Check to Oily Water Sewer	0.00	0.00	0.00	0.0000	23400.00	28600.00	26000.00	0.0949	4	26,000	0.095	0.0000

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
PS3B	402-E	Stripper Tower	Kerosene Color Check to Oily Water Sewer	X			X						X	0	3,524
PS3B	402-E	Stripper Tower	Diesel Color Check to Oily Water Sewer	X			X						X	0	3,317
PS3B	402-F	Overhead Product Drum	402-F Drain to Above-Ground Oily Water Separator	X		X							X	246,276,213	2,189,122
PS3B	402-F	Overhead Product Drum	402-F Water Samples to Oily Water Sewer	X			X						X	2,736	24
PS3B	403-LA	1st Stage Desalter	403-LA Desalter Brine Water to Above-Ground Oily Water Separator	X		X							X	560,307,408	7,679,340
PS3B	403-LA	1st Stage Desalter	403-LA Desalter Rag Layer Checks to Sample Panel to Cold KO Drum	X			X						X	41,461	111,944
PS3B	403-LB	2nd Stage Desalter	403-LB Desalter Rag Layer Checks to Sample Panel to Cold KO Drum	X			X						X	41,461	111,944
PS3B	404-L	Wet Gas Filter	404-L Drain to Cold KO Drum	X			X						X	82,921	24,324
PS3B	405-FA	Fuel Gas KO Drum	405-FA Drain to Above-Ground Oily Water Separator	X			X						X	3,455	2,419
PS3B	405-FA	Fuel Gas KO Drum	405-FA Drain to Cold KO Drum	X			X						X	3,455	2,419
PS3B	405-LA/LB	Seal Oil Filter	405-LA/LB Drain to Cold KO Drum	X			X						X	0	61
PS3B	413-F	Overhead Intermediate Drum	413-F Water Samples to Oily Water Sewer	X			X						X	684	6
PS3B	417-F	Tail Gas Separator	417-F Drain to Above-Ground Oily Water Separator	X			X						X	9,642,684	446,609
PS3B	425-F	KO Drum	425-F Drain to 424-F (Drain Drum)	X			X						X	366,488	2,591
PS3B	459-FA-FF	549-J/JA/JB Discharge/Suction Snubbers	459-FA-FF Drain to Hot Well Drum	X		X							X	45,772,549	7,005,190
PS3B	459-FA-FF	549-J/JA/JB Discharge/Suction Snubbers	459-FA-FF Drain to Oily Water Sewer	X			X						X	4,093	626

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
PS3B	402-E	Stripper Tower	Kerosene Color Check to Oily Water Sewer	0.11	0.19	0.15	0.0000	933.00	1555.00	1244.00	0.0044	4	1,244	0.004	0.0000
PS3B	402-E	Stripper Tower	Diesel Color Check to Oily Water Sewer	0.00	10.00	5.00	0.0000	200.00	420.00	310.00	0.0010	3	310	0.001	0.0000
PS3B	402-F	Overhead Product Drum	402-F Drain to Above-Ground Oily Water Separator	0.15	37.45	14.90	3.6695	21600.00	26400.00	24000.00	52.5389	248,465	226	56.208	0.0000
PS3B	402-F	Overhead Product Drum	402-F Water Samples to Oily Water Sewer	0.15	37.45	14.90	0.0000	21600.00	26400.00	24000.00	0.0006	3	226	0.001	0.0000
PS3B	403-LA	1st Stage Desalter	403-LA Desalter Brine Water to Above-Ground Oily Water Separator	2.54	31.16	7.35	4.1183	0.01	13593.00	713.00	5.4754	567,987	17	9.594	0.0000
PS3B	403-LA	1st Stage Desalter	403-LA Desalter Rag Layer Checks to Sample Panel to Cold KO Drum	2.54	31.16	7.35	0.0003	0.01	13593.00	713.00	0.0798	153	522	0.080	0.0000
PS3B	403-LB	2nd Stage Desalter	403-LB Desalter Rag Layer Checks to Sample Panel to Cold KO Drum	2.54	31.16	7.35	0.0003	0.01	13593.00	713.00	0.0798	153	522	0.080	0.0000
PS3B	404-L	Wet Gas Filter	404-L Drain to Cold KO Drum	216.00	264.00	240.00	0.0199	21600.00	26400.00	24000.00	0.5838	107	5,629	0.604	0.0000
PS3B	405-FA	Fuel Gas KO Drum	405-FA Drain to Above-Ground Oily Water Separator	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	6	9	0.000	0.0000
PS3B	405-FA	Fuel Gas KO Drum	405-FA Drain to Cold KO Drum	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	6	9	0.000	0.0000
PS3B	405-LA/LB	Seal Oil Filter	405-LA/LB Drain to Cold KO Drum	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
PS3B	413-F	Overhead Intermediate Drum	413-F Water Samples to Oily Water Sewer	216.00	264.00	240.00	0.0002	21600.00	26400.00	24000.00	0.0001	1	449	0.000	0.0000
PS3B	417-F	Tail Gas Separator	417-F Drain to Above-Ground Oily Water Separator	7.20	8.80	8.00	0.0771	720.00	880.00	800.00	0.3573	10,089	43	0.434	0.0000
PS3B	425-F	KO Drum	425-F Drain to 424-F (Drain Drum)	0.07	0.32	0.21	0.0001	6.80	32.00	20.60	0.0001	369	0	0.000	0.0000
PS3B	459-FA-FF	549-J/JA/JB Discharge/Suction Snubbers	459-FA-FF Drain to Hot Well Drum	9.00	11.00	10.00	0.4577	117.00	143.00	130.00	0.9107	52,778	26	1.368	0.0000
PS3B	459-FA-FF	549-J/JA/JB Discharge/Suction Snubbers	459-FA-FF Drain to Oily Water Sewer	9.00	11.00	10.00	0.0000	117.00	143.00	130.00	0.0001	5	26	0.000	0.0000

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
PS3B	460-CA/CB/CC	Vacuum Tower Overhead Ejector Condensers	460-CA/CB/CC Drain to Hot Well Drum	X		X							X	411,952,939	63,046,711
PS3B	490-LA/LB	Gland Oil Filters	Gland Oil Filter Changeouts to Oily Water Sewer	X			X		X				X	0	31,987
PS3B	616-L/LA	Duplex Strainer	616-LA/LB Drain to Oily Water Sewer	X			X						X	0	6
PS3B	617-L/LA	Duplex Strainer	617-LA/LB Drain to Oily Water Sewer	X			X						X	0	6
PS3B	618-L/LA	Duplex Strainer	602-LA/LB Drain to Oily Water Sewer	X			X						X	0	6
PS3B	F-816	FG Peanut Drum	F-816 Drain to Light Slop Header	X									X	361,753	2,558
PS3B	LVGO Filters	LVGO/Gland Oil Filters	LVGO Filter Changeouts to Oily Water Sewer (P-459 J's)	X			X						X	0	300
PS3B	LVGO Filters	LVGO/Gland Oil Filters	LVGO Filter Changeouts to Oily Water Sewer (P-450 J's)	X			X						X	0	50
PS3B	LVGO Oil Filters	LVGO Oil Filters	LVGO Oil Filter Changeouts to Oily Water Sewer (P-449 J's)	X			X						X	0	578
PS3B	N/A	401-J/JA Suction Screens	401-J/JA Suction Screens Changeout to Pumpout System	X					X				X	0	818
PS3B	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	X			X						X	0	67
PS3B	Pump Oil Mist System	Pump Oil Mist System	Pump Oil Mist System Drips to Pad/Oily Water Sewer Washdown		X		X						X	0	1,333
PS3B	Various	Gland Oil Flush/Misc RV's	Gland Oil Flush/Misc RV's to Hot Relief KO Drum	X			X						X	0	30,547
PS3B	Various	Gland Oil Flush/Misc RV's	Gland Oil Flush/Misc RV's to Cold Relief KO Drum	X			X						X	305,659	23,322
Pumps	Pumps	Controlled Pump Maintenance Activities	Controlled Pump Maintenance Wastes	X					X				X	0	11,659
Pumps	Pumps	Uncontrolled Pump Maintenance Activities	Uncontrolled Pump Maintenance Wastes		X				X				X	0	3,349
Pumps TAR	Pumps	Controlled Pump Maintenance Activities	Controlled Pump Maintenance Wastes	X					X				X	0	2

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
PS3B	460-CA/CB/CC	Vacuum Tower Overhead Ejector Condensers	460-CA/CB/CC Drain to Hot Well Drum	9.00	11.00	10.00	4.1195	117.00	143.00	130.00	8.1961	475,000	26	12.316	0.0000
PS3B	490-LA/LB	Gland Oil Filters	Gland Oil Filter Changeouts to Oily Water Sewer	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	32	0	0.000	0.0000
PS3B	616-L/LA	Duplex Strainer	616-LA/LB Drain to Oily Water Sewer	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
PS3B	617-L/LA	Duplex Strainer	617-LA/LB Drain to Oily Water Sewer	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
PS3B	618-L/LA	Duplex Strainer	602-LA/LB Drain to Oily Water Sewer	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
PS3B	F-816	FG Peanut Drum	F-816 Drain to Light Slop Header	0.07	0.32	0.21	0.0001	6.80	32.00	20.60	0.0001	364	0	0.000	0.0000
PS3B	LVGO Filters	LVGO/Gland Oil Filters	LVGO Filter Changeouts to Oily Water Sewer (P-459 J's)	3.30	4.04	3.67	0.0000	330.30	403.70	367.00	0.0001	0	367	0.000	0.0000
PS3B	LVGO Filters	LVGO/Gland Oil Filters	LVGO Filter Changeouts to Oily Water Sewer (P-450 J's)	3.30	4.04	3.67	0.0000	330.30	403.70	367.00	0.0000	0	367	0.000	0.0000
PS3B	LVGO Oil Filters	LVGO Oil Filters	LVGO Oil Filter Changeouts to Oily Water Sewer (P-449 J's)	3.30	4.04	3.67	0.0000	330.30	403.70	367.00	0.0002	1	367	0.000	0.0000
PS3B	N/A	401-J/JA Suction Screens	401-J/JA Suction Screens Changeout to Pumpout System	0.00	135.93	7.13	0.0000	0.01	13593.00	713.00	0.0006	1	713	0.001	0.0000
PS3B	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	216.00	264.00	240.00	0.0000	21600.00	26400.00	24000.00	0.0016	0	24,000	0.002	0.0000
PS3B	Pump Oil Mist System	Pump Oil Mist System	Pump Oil Mist System Drips to Pad/Oily Water Sewer Washdown	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	1	5	0.000	0.0000
PS3B	Various	Gland Oil Flush/Misc RV's	Gland Oil Flush/Misc RV's to Hot Relief KO Drum	0.00	135.93	7.13	0.0000	0.01	13593.00	713.00	0.0218	31	713	0.022	0.0000
PS3B	Various	Gland Oil Flush/Misc RV's	Gland Oil Flush/Misc RV's to Cold Relief KO Drum	0.00	135.93	7.13	0.0022	0.01	13593.00	713.00	0.0166	329	57	0.019	0.0000
Pumps	Pumps	Controlled Pump Maintenance Activities	Controlled Pump Maintenance Wastes	0.00	0.00	0.00	0.0000	10.00	1,000,000	18,281	0.2131	12	18,281	0.213	0.0000
Pumps	Pumps	Uncontrolled Pump Maintenance Activities	Uncontrolled Pump Maintenance Wastes	0.00	0.00	0.00	0.0000	0.00	1,000,000	2,203	0.0074	3	2,203	0.007	0.0074
Pumps TAR	Pumps	Controlled Pump Maintenance Activities	Controlled Pump Maintenance Wastes	0.00	0.00	0.00	0.0000	10.00	1,000,000	957	0.0015	0	957	0.001	0.0000

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
Pumps TAR	Pumps	Uncontrolled Pump Maintenance Activities	Uncontrolled Pump Maintenance Wastes		X				X				X	0	0
Purges	Purges	Sample Purges in Units	Sample Purges in Units to Uncontrolled Destinations		X		X						X	0	291,199
Purges	Purges	Sample Purges in Units	Sample Purges in Units to Controlled Destinations	X			X						X	0	127,812
RDU	602-F	Solvent Surge Drum	Solvent Surge Drum Sour Water to Sour Water Blowdown Drum	X			X						X	41,461	1,819
RDU	602-F	Solvent Surge Drum	Solvent Surge Drum Sour Water to Process Water Header	X		X							X	59,106,291	477,627
RDU	602-F	Solvent Surge Drum	Solvent Surge Drum to Flare KO Drum	X					X				X	0	228,999
RDU	603- LA/LB	Seal Flush Filter	Filters Changeout to Flare K.O. Drum	X			X						X	0	129
RDU	604-F	Fuel Gas KO Drum	Fuel Gas KO Drum to Flare KO Drum	X			X						X	101,502	71,051
RDU	619-JAB	Oily Water Separator Wastewater pump	Oily Water Separator Wastewater pump strainer waste to Oily Water Sewer	X			X		X				X	341	30
RDU	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to 605 Flare Drum	X			X						X	0	66
RDU	Sample Station	Sample Station	Sample Station Drips to Oily Water Sewer	X							X		X	0	264
RHU	210/211/212-LA/B	Reactor Seal Oil Filters	Reactor Seal Oil Filter Changeouts to Used Oil Tote	X					X				X	0	59
RHU	275-L-A/B	Seal Oil Filters	Seal Oil Filter Changeouts to Used Oil Tote	X					X				X	0	18
RHU	276-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	277-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	278-L-A/B	Lube Oil Filters	Lube Oil Filter Changeouts to Used Oil Tote	X					X				X	0	18
RHU	279-L-A/B	Seal Oil Filters	Seal Oil Filter Changeouts to Used Oil Tote	X					X				X	0	18

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Table 1

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
Pumps TAR	Pumps	Uncontrolled Pump Maintenance Activities	Uncontrolled Pump Maintenance Wastes	0.00	0.00	0.00	0.0000	0.00	1,000,000	5	0.0000	0	5	0.000	0.0000
Purges	Purges	Sample Purges in Units	Sample Purges in Units to Uncontrolled Destinations	0.00	0.00	0.00	0.0000	10.00	1,000,000	902	0.2626	291	902	0.263	0.2626
Purges	Purges	Sample Purges in Units	Sample Purges in Units to Controlled Destinations	0.00	0.00	0.00	0.0000	10.00	1,000,000	1,603	0.2049	128	1,603	0.205	0.0000
RDU	602-F	Solvent Surge Drum	Solvent Surge Drum Sour Water to Sour Water Blowdown Drum	39.00	65.00	52.00	0.0022	16200.00	19800.00	18000.00	0.0327	43	806	0.035	0.0000
RDU	602-F	Solvent Surge Drum	Solvent Surge Drum Sour Water to Process Water Header	1.50	180.00	90.75	5.3639	150.00	18000.00	9075.00	4.3345	59,584	163	9.698	0.0000
RDU	602-F	Solvent Surge Drum	Solvent Surge Drum to Flare KO Drum	1.50	180.00	90.75	0.0000	150.00	18000.00	9075.00	2.0782	229	9,075	2.078	0.0000
RDU	603- LA/LB	Seal Flush Filter	Filters Changeout to Flare K.O. Drum	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	0	0	0.000	0.0000
RDU	604-F	Fuel Gas KO Drum	Fuel Gas KO Drum to Flare KO Drum	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0015	173	9	0.001	0.0000
RDU	619-JAB	Oily Water Separator Wastewater pump	Oily Water Separator Wastewater pump strainer waste to Oily Water Sewer	1.50	180.00	90.75	0.0000	150.00	18000.00	9075.00	0.0003	0	824	0.000	0.0000
RDU	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to 605 Flare Drum	39.00	65.00	52.00	0.0000	16200.00	19800.00	18000.00	0.0012	0	18,000	0.001	0.0000
RDU	Sample Station	Sample Station	Sample Station Drips to Oily Water Sewer	39.00	65.00	52.00	0.0000	16200.00	19800.00	18000.00	0.0047	0	18,000	0.005	0.0000
RHU	210/211/212-LA/B	Reactor Seal Oil Filters	Reactor Seal Oil Filter Changeouts to Used Oil Tote	0.00	0.00	0.00	0.0000	300.00	500.00	400.00	0.0000	0	400	0.000	0.0000
RHU	275-L-A/B	Seal Oil Filters	Seal Oil Filter Changeouts to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	276-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	277-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	278-L-A/B	Lube Oil Filters	Lube Oil Filter Changeouts to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	279-L-A/B	Seal Oil Filters	Seal Oil Filter Changeouts to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000

NOTE: Each line item is split across two pages.

Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
RHU	281-C	Gland Condenser	Gland Condenser Drain to Oily Water Sewer	X		X							X	497,528	0
RHU	283-F	Condensate Receiver	Condensate Receiver Drain to Oily Water Sewer	X			X						X	497,528	0
RHU	310/311/312-LA/B	Reactor Seal Oil Filters	Reactor Seal Oil Filter Changeouts to Used Oil Tote	X					X				X	0	59
RHU	375-L-A/B	Seal Oil Filters	Seal Oil Filter Changeouts to Used Oil Tote	X					X				X	0	18
RHU	376-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	377-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	378-L-A/B	Lube Oil Filters	Lube Oil Filter Changeouts to Used Oil Tote	X					X				X	0	18
RHU	379-L-A/B	Seal Oil Filters	Seal Oil Filter Changeouts to Used Oil Tote	X					X				X	0	18
RHU	381-C	Gland Condenser	Gland Condenser Drain to Oily Water Sewer	X		X							X	497,528	0
RHU	383-F	Condensate Receiver	Condensate Receiver Drain to Oily Water Sewer	X			X						X	497,528	0
RHU	410/411/412-LA/B	Reactor Seal Oil Filters	Reactor Seal Oil Filter Changeouts to Used Oil Tote	X					X				X	0	59
RHU	475-L-A/B	Seal Oil Filters	Seal Oil Filter Changeouts to Used Oil Tote	X					X				X	0	18
RHU	476-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	477-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	478-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	479-L-A/B	Seal Oil Filters	Seal Oil Filter Changeouts to Used Oil Tote	X					X				X	0	18
RHU	481-C	Gland Condenser	Gland Condenser Drain to Oily Water Sewer	X		X							X	497,528	0

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
RHU	281-C	Gland Condenser	Gland Condenser Drain to Oily Water Sewer	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	498	0	0.000	0.0000
RHU	283-F	Condensate Receiver	Condensate Receiver Drain to Oily Water Sewer	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	498	0	0.000	0.0000
RHU	310/311/312-LA/B	Reactor Seal Oil Filters	Reactor Seal Oil Filter Changeouts to Used Oil Tote	0.00	0.00	0.00	0.0000	300.00	500.00	400.00	0.0000	0	400	0.000	0.0000
RHU	375-L-A/B	Seal Oil Filters	Seal Oil Filter Changeouts to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	376-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	377-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	378-L-A/B	Lube Oil Filters	Lube Oil Filter Changeouts to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	379-L-A/B	Seal Oil Filters	Seal Oil Filter Changeouts to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	381-C	Gland Condenser	Gland Condenser Drain to Oily Water Sewer	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	498	0	0.000	0.0000
RHU	383-F	Condensate Receiver	Condensate Receiver Drain to Oily Water Sewer	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	498	0	0.000	0.0000
RHU	410/411/412-LA/B	Reactor Seal Oil Filters	Reactor Seal Oil Filter Changeouts to Used Oil Tote	0.00	0.00	0.00	0.0000	300.00	500.00	400.00	0.0000	0	400	0.000	0.0000
RHU	475-L-A/B	Seal Oil Filters	Seal Oil Filter Changeouts to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	476-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	477-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	478-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	479-L-A/B	Seal Oil Filters	Seal Oil Filter Changeouts to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	481-C	Gland Condenser	Gland Condenser Drain to Oily Water Sewer	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	498	0	0.000	0.0000

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
RHU	483-F	Condensate Receiver	Condensate Receiver Drain to Oily Water Sewer	X			X						X	497,528	0
RHU	511-F	H P Sour Water Flash Drum	H P Sour Water Flash Drum Drain to Hot/Dry Flare KO Drum	X			X						X	0	41,599
RHU	514-LA/B	LP Seal Oil Filters	LP Seal Oil Filter Changeouts to Used Oil Tote	X					X				X	0	36
RHU	515-F-A	Make-Up Gas Filter	Make-Up Gas Filter Drain to Hot/Dry Flare KO Drum	X			X						X	6,406	4,484
RHU	515-F-B	Make-Up Gas Filter	Make-Up Gas Filter Drain to Hot/Dry Flare KO Drum	X			X						X	6,406	4,484
RHU	516-F-A	Make-Up Gas Suction Drum	Make-Up Gas Suction Drum Drain to Hot/Dry Flare KO Drum	X			X						X	14,414	10,090
RHU	516-F-B	Make-Up Gas Suction Drum	Make-Up Gas Suction Drum Drain to Hot/Dry Flare KO Drum	X			X						X	14,414	10,090
RHU	528-F-A/B/C 556-LA/B/C	Catalyst Inventory Spent Catalyst Vessel and Classifiers	Catalyst Inventory Spent Catalyst Vessel and Classifiers to Diesel Overfill to Sump	X			X						X	0	91,355
RHU	535-F	Sour Water Degassing Drum	Sour Water Degassing Drum Drain to Hot/Dry Flare KO Drum	X			X						X	0	48,533
RHU	539-F-A, 542-F-A, 545-F-A, 548-F-A	Make-Up Gas Compressor Liquid Level Sump	Make-Up Gas Compressor Liquid Level Sump Drain to Hot/Dry Flare KO Drum	X			X						X	5,528	3,870
RHU	539-F-B, 542-F-B, 545-F-B, 548-F-B	Make-Up Gas Compressor Liquid Level Sump	Make-Up Gas Compressor Liquid Level Sump Drain to Hot/Dry Flare KO Drum	X			X						X	5,528	3,870
RHU	539-F-C, 542-F-C, 545-F-C, 548-F-C	Make-Up Gas Compressor Liquid Level Sump	Make-Up Gas Compressor Liquid Level Sump Drain to Hot/Dry Flare KO Drum	X			X						X	5,528	3,870
RHU	539-F-D, 542-F-D, 545-F-D, 548-F-D	Make-Up Gas Compressor Liquid Level Sump	Make-Up Gas Compressor Liquid Level Sump Drain to Hot/Dry Flare KO Drum	X			X						X	5,528	3,870
RHU	539-F-E, 542-F-E, 545-F-E, 548-F-E	Make-Up Gas Compressor Liquid Level Sump	Make-Up Gas Compressor Liquid Level Sump Drain to Hot/Dry Flare KO Drum	X			X						X	5,528	3,870
RHU	539-F-F, 542-F-F, 545-F-F, 548-F-F	Make-Up Gas Compressor Liquid Level Sump	Make-Up Gas Compressor Liquid Level Sump Drain to Hot/Dry Flare KO Drum	X			X						X	5,528	3,870
RHU	560-F	Cold/Wet Flare KO Drum	Cold/Wet Flare K O Drum Drain to Slop Header	X				X					X	0	1,225
RHU	575-L-A	Lube Oil Filter	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
RHU	483-F	Condensate Receiver	Condensate Receiver Drain to Oily Water Sewer	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	498	0	0.000	0.0000
RHU	511-F	H P Sour Water Flash Drum	H P Sour Water Flash Drum Drain to Hot/Dry Flare KO Drum	0.00	0.00	0.00	0.0000	1975.00	3335.00	2655.00	0.1104	42	2,655	0.110	0.0000
RHU	514-LA/B	LP Seal Oil Filters	LP Seal Oil Filter Changeouts to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	515-F-A	Make-Up Gas Filter	Make-Up Gas Filter Drain to Hot/Dry Flare KO Drum	15.00	25.00	20.00	0.0001	1500.00	2500.00	2000.00	0.0090	11	835	0.009	0.0000
RHU	515-F-B	Make-Up Gas Filter	Make-Up Gas Filter Drain to Hot/Dry Flare KO Drum	15.00	25.00	20.00	0.0001	1500.00	2500.00	2000.00	0.0090	11	835	0.009	0.0000
RHU	516-F-A	Make-Up Gas Suction Drum	Make-Up Gas Suction Drum Drain to Hot/Dry Flare KO Drum	15.00	25.00	20.00	0.0003	1500.00	2500.00	2000.00	0.0202	25	835	0.020	0.0000
RHU	516-F-B	Make-Up Gas Suction Drum	Make-Up Gas Suction Drum Drain to Hot/Dry Flare KO Drum	15.00	25.00	20.00	0.0003	1500.00	2500.00	2000.00	0.0202	25	835	0.020	0.0000
RHU	528-F-A/B/C 556-LA/B/C	Catalyst Inventory Spent Catalyst Vessel and Classifiers	Catalyst Inventory Spent Catalyst Vessel and Classifiers to Diesel Overfill to Sump	0.00	10.00	5.00	0.0000	200.00	420.00	310.00	0.0283	91	310	0.028	0.0000
RHU	535-F	Sour Water Degassing Drum	Sour Water Degassing Drum Drain to Hot/Dry Flare KO Drum	0.00	0.00	0.00	0.0000	1975.00	3335.00	2655.00	0.1289	49	2,655	0.129	0.0000
RHU	539-F-A, 542-F-A, 545-F-A, 548-F-A	Make-Up Gas Compressor Liquid Level Sump	Make-Up Gas Compressor Liquid Level Sump Drain to Hot/Dry Flare KO Drum	15.00	25.00	20.00	0.0001	1500.00	2500.00	2000.00	0.0077	9	835	0.008	0.0000
RHU	539-F-B, 542-F-B, 545-F-B, 548-F-B	Make-Up Gas Compressor Liquid Level Sump	Make-Up Gas Compressor Liquid Level Sump Drain to Hot/Dry Flare KO Drum	15.00	25.00	20.00	0.0001	1500.00	2500.00	2000.00	0.0077	9	835	0.008	0.0000
RHU	539-F-C, 542-F-C, 545-F-C, 548-F-C	Make-Up Gas Compressor Liquid Level Sump	Make-Up Gas Compressor Liquid Level Sump Drain to Hot/Dry Flare KO Drum	15.00	25.00	20.00	0.0001	1500.00	2500.00	2000.00	0.0077	9	835	0.008	0.0000
RHU	539-F-D, 542-F-D, 545-F-D, 548-F-D	Make-Up Gas Compressor Liquid Level Sump	Make-Up Gas Compressor Liquid Level Sump Drain to Hot/Dry Flare KO Drum	15.00	25.00	20.00	0.0001	1500.00	2500.00	2000.00	0.0077	9	835	0.008	0.0000
RHU	539-F-E, 542-F-E, 545-F-E, 548-F-E	Make-Up Gas Compressor Liquid Level Sump	Make-Up Gas Compressor Liquid Level Sump Drain to Hot/Dry Flare KO Drum	15.00	25.00	20.00	0.0001	1500.00	2500.00	2000.00	0.0077	9	835	0.008	0.0000
RHU	539-F-F, 542-F-F, 545-F-F, 548-F-F	Make-Up Gas Compressor Liquid Level Sump	Make-Up Gas Compressor Liquid Level Sump Drain to Hot/Dry Flare KO Drum	15.00	25.00	20.00	0.0001	1500.00	2500.00	2000.00	0.0077	9	835	0.008	0.0000
RHU	560-F	Cold/Wet Flare KO Drum	Cold/Wet Flare K O Drum Drain to Slop Header	9.00	15.00	12.00	0.0000	3750.00	6250.00	5000.00	0.0061	1	5,000	0.006	0.0000
RHU	575-L-A	Lube Oil Filter	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
RHU	575-L-A/B	Seal Oil Filters	Seal Oil Filter Changeouts to Used Oil Tote	X					X				X	0	18
RHU	575-L-B	Lube Oil Filter	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	575-L-C	Lube Oil Filter	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	575-L-D	Lube Oil Filter	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	575-L-E	Lube Oil Filter	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	575-L-F	Lube Oil Filter	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	577-L-A/B	Seal Oil Filters	Seal Oil Filter Changeouts to Used Oil Tote	X					X				X	0	18
RHU	579-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	580-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	581-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	582-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	583-L	Mist Generator / Cuno Oil Filter	Mist Generator /Cuno Oil Filter Changeout to Used Oil Tote	X					X				X	0	36
RHU	586-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	587-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	588-L	Mist Generator / Cuno Oil Filter	Mist Generator /Cuno Oil Filter Changeout to Used Oil Tote	X					X				X	0	36
RHU	604-F	Rich MEA Surge Drum	Rich MEA Surge Drum Drain to Light Slop	X							X		X	0	2,703
RHU	604-L, 604-LA	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
RHU	575-L-A/B	Seal Oil Filters	Seal Oil Filter Changeouts to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	575-L-B	Lube Oil Filter	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	575-L-C	Lube Oil Filter	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	575-L-D	Lube Oil Filter	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	575-L-E	Lube Oil Filter	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	575-L-F	Lube Oil Filter	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	577-L-A/B	Seal Oil Filters	Seal Oil Filter Changeouts to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	579-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	580-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	581-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	582-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	583-L	Mist Generator / Cuno Oil Filter	Mist Generator /Cuno Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	586-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	587-L-A/B	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	588-L	Mist Generator / Cuno Oil Filter	Mist Generator /Cuno Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	604-F	Rich MEA Surge Drum	Rich MEA Surge Drum Drain to Light Slop	0.00	0.00	0.00	0.0000	1975.00	3335.00	2655.00	0.0072	3	2,655	0.007	0.0000
RHU	604-L, 604-LA	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000

NOTE: Each line item is split across two pages.

Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
RHU	605-L, 605-LA	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	616-F	Blowdown Drum	Blowdown Drum Drain Lined up to Slop Oil Header	X			X						X	0	50,823
RHU	618-F	Furnace Fuel Gas KO Drum	Furnace Fuel Gas K O Drum Drain to Blowdown Drum	X			X						X	0	2,042
RHU	NA	Cuno Oil Filter/Oil Filter	Cuno Oil Filter/Oil Filter Changeout to Used Oil Tote	X					X				X	0	36
RHU	NA	Filters	Filter Changeouts to Used Oil Tote	X					X				X	0	18
RHU	NA	Mist Generator Oil Filter	Mist Generator Oil Filter Changeout to Used Oil Tote	X					X				X	0	18
RHU	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	X			X						X	0	64
RW	Recovery Wells	All Groundwater Remediation Recovery Wells	Groundwater Remediation Recovery Wells into Closed Piping to process water header	X		X							X	10,539,873	26,798
S&T Exchangers	S&T Exchangers	Uncontrolled S&T Exchanger Maintenance	Uncontrolled S&T Exchanger Maintenance to Exchanger Pad Washdown		X				X				X	55,659	0
S&T Exchangers	S&T Exchangers	Uncontrolled S&T Exchanger Maintenance	Uncontrolled S&T Exchanger Maintenance		X				X				X	0	0
S&T Exchangers	S&T Exchangers	Controlled S&T Exchanger Maintenance	Controlled S&T Exchanger Maintenance	X					X				X	0	232,459
S&T Exchangers TAR	S&T Exchangers	Uncontrolled S&T Exchanger Maintenance	Uncontrolled S&T Exchanger Maintenance to Exchanger Pad Washdown		X				X				X	0	0
S&T Exchangers TAR	S&T Exchangers	Uncontrolled S&T Exchanger Maintenance	Uncontrolled S&T Exchanger Maintenance		X				X				X	0	24
S&T Exchangers TAR	S&T Exchangers	Controlled S&T Exchanger Maintenance	Controlled S&T Exchanger Maintenance	X					X				X	0	103
Spills	Spills	Spills	Uncontrolled Spills		X		X						X	0	204,213
SHU3	F-301	SHU Feed Reactor Surge Drum, Water Boot	SHU Feed Reactor Surge Drum, Water Boot	X			X						X	303	1,090
SHU3	F-302	Splitter Reflux Drum WB	Splitter Reflux Drum WB	X			X						X	37,864	151,454

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
RHU	605-L, 605-LA	Lube Oil Filters	Lube Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	616-F	Blowdown Drum	Blowdown Drum Drain Lined up to Slop Oil Header	9.00	15.00	12.00	0.0000	3750.00	6250.00	5000.00	0.2541	51	5,000	0.254	0.0000
RHU	618-F	Furnace Fuel Gas KO Drum	Furnace Fuel Gas K O Drum Drain to Blowdown Drum	9.00	15.00	12.00	0.0000	3750.00	6250.00	5000.00	0.0102	2	5,000	0.010	0.0000
RHU	NA	Cuno Oil Filter/Oil Filter	Cuno Oil Filter/Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	NA	Filters	Filter Changeouts to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	NA	Mist Generator Oil Filter	Mist Generator Oil Filter Changeout to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
RHU	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	0.00	0.00	0.00	0.0000	1975.00	3335.00	2655.00	0.0002	0	2,655	0.000	0.0000
RW	Recovery Wells	All Groundwater Remediation Recovery Wells	Groundwater Remediation Recovery Wells into Closed Piping to process water header	0.00	9,224	12.62	0.1330	0.00	9,224	7,756	0.2079	10,567	32	0.341	0.0000
S&T Exchangers	S&T Exchangers	Uncontrolled S&T Exchanger Maintenance	Uncontrolled S&T Exchanger Maintenance to Exchanger Pad Washdown	0.00	2,000	96.38	0.0054	0.00	0.00	0.00	0.0000	56	96	0.005	0.0054
S&T Exchangers	S&T Exchangers	Uncontrolled S&T Exchanger Maintenance	Uncontrolled S&T Exchanger Maintenance	0.00	0.00	0.00	0.0000	50.00	44,500	0	0.0000	0	0	0.000	0.0000
S&T Exchangers	S&T Exchangers	Controlled S&T Exchanger Maintenance	Controlled S&T Exchanger Maintenance	0.00	0.00	0.00	0.0000	0.01	44,500	4,769	1.1087	232	4,769	1.109	0.0000
S&T Exchangers TAR	S&T Exchangers	Uncontrolled S&T Exchanger Maintenance	Uncontrolled S&T Exchanger Maintenance to Exchanger Pad Washdown	0.00	0	0.00	0.0000	0.00	0.00	0.00	0.0000	0	0	0.000	0.0000
S&T Exchangers TAR	S&T Exchangers	Uncontrolled S&T Exchanger Maintenance	Uncontrolled S&T Exchanger Maintenance	0.00	0.00	0.00	0.0000	50.00	44,500	4	0.0001	0	4	0.000	0.0001
S&T Exchangers TAR	S&T Exchangers	Controlled S&T Exchanger Maintenance	Controlled S&T Exchanger Maintenance	0.00	0.00	0.00	0.0000	0.01	44,500	198	0.0205	0	198	0.020	0.0000
Spills	Spills	Spills	Uncontrolled Spills	0.00	0.00	0.00	0.0000	<0.01	1,000,000	0.01	0.0078	204	0	0.008	0.0078
SHU3	F-301	SHU Feed Reactor Surge Drum, Water Boot	SHU Feed Reactor Surge Drum, Water Boot	37.50	60.90	47.40	0.0000	3750.00	6090.00	4740.00	0.0052	1	3,720	0.005	0.0000
SHU3	F-302	Splitter Reflux Drum WB	Splitter Reflux Drum WB	5.00	18.11	7.48	0.0003	5.00	18.11	18.11	0.0027	189	16	0.003	0.0000

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
SHU3	L-304A	Burner Gas Coalescer	Burner Gas Coalescer	X			X						X	1,817	6,179
SHU3	L-304B	Burner Gas Coalescer	Burner Gas Coalescer	X			X						X	1,817	6,179
SHU3	F-307	Fuel Gas KO Drum	Fuel Gas KO Drum	X			X						X	9,087	30,897
SRU	D-1	Amine Feed Drum	Amine Feed Drum Oil Skim Drain to Slop Header	X			X						X	0	1,109
SRU	D-1	Amine Feed Drum	Amine Feed Drum Oil Skim Drain to A/B Oily Water Sump	X			X						X	0	277
SRU	D-100A/B	De-oiler Drums	De-oiler Drums Oil Skim Drain to Slop Oil Header	X			X						X	0	293,680
SRU	D-10C	Amine Feed Drum	Amine Feed Drum Drain to Slop Header	X			X						X	0	1,373
SRU	D-10C	Amine Feed Drum	Amine Feed Drum Drain to Slop Oil Sump Tank	X			X						X	0	14
SRU	D-10D	Amine Feed Drum	Amine Feed Drum Drain to Slop Header	X			X						X	0	1,373
SRU	D-10D	Amine Feed Drum	Amine Feed Drum Drain to Slop Oil Sump Tank	X			X						X	0	14
SRU	D-11	Acid Gas Knockout Drum	Acid Gas Knockout Drum Drain to Slop Oil Slop Tank	X				X					X	10,010	0
SRU	D-2A	Amine Reflux Drum	Amine Reflux Drum Oil Skim Drain to A/B Oily Water Sump	X			X						X	10,196	8,768
SRU	D-2B	Amine Reflux Drum	Amine Reflux Drum Oil Skim Drain to A/B Oily Water Sump	X			X						X	10,196	8,768
SRU	D-2C	Amine Reflux Drum	Amine Reflux Drum Oil Skim Drain to Slop Oil Sump Tank	X			X						X	9,346	8,038
SRU	D-2D	Amine Reflux Drum	Amine Reflux Drum Oil Skim Drain to Slop Oil Sump Tank	X			X						X	9,346	8,038
SRU	D-3	Acid Gas Knockout Drum	Acid Gas Knockout Drum Drain to A/B Oily Water Sump	X			X						X	1,713	0
SRU	D-4	Flare Knockout Drum	Flare Knockout Drum Drain to Slop Oil Drain	X			X						X	125,123	107,605

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
SHU3	L-304A	Burner Gas Coalescer	Burner Gas Coalescer	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0001	8	16	0.000	0.0000
SHU3	L-304B	Burner Gas Coalescer	Burner Gas Coalescer	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0001	8	16	0.000	0.0000
SHU3	F-307	Fuel Gas KO Drum	Fuel Gas KO Drum	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0006	40	16	0.001	0.0000
SRU	D-1	Amine Feed Drum	Amine Feed Drum Oil Skim Drain to Slop Header	28.88	48.13	38.50	0.0000	2887.50	4812.50	3850.00	0.0043	1	3,850	0.004	0.0000
SRU	D-1	Amine Feed Drum	Amine Feed Drum Oil Skim Drain to A/B Oily Water Sump	28.88	48.13	38.50	0.0000	2887.50	4812.50	3850.00	0.0011	0	3,850	0.001	0.0000
SRU	D-100A/B	De-oiler Drums	De-oiler Drums Oil Skim Drain to Slop Oil Header	9.00	15.00	12.00	0.0000	3750.00	6250.00	5000.00	1.4684	294	5,000	1.468	0.0000
SRU	D-10C	Amine Feed Drum	Amine Feed Drum Drain to Slop Header	28.88	48.13	38.50	0.0000	2887.50	4812.50	3850.00	0.0053	1	3,850	0.005	0.0000
SRU	D-10C	Amine Feed Drum	Amine Feed Drum Drain to Slop Oil Sump Tank	28.88	48.13	38.50	0.0000	2887.50	4812.50	3850.00	0.0001	0	3,850	0.000	0.0000
SRU	D-10D	Amine Feed Drum	Amine Feed Drum Drain to Slop Header	28.88	48.13	38.50	0.0000	2887.50	4812.50	3850.00	0.0053	1	3,850	0.005	0.0000
SRU	D-10D	Amine Feed Drum	Amine Feed Drum Drain to Slop Oil Sump Tank	28.88	48.13	38.50	0.0000	2887.50	4812.50	3850.00	0.0001	0	3,850	0.000	0.0000
SRU	D-11	Acid Gas Knockout Drum	Acid Gas Knockout Drum Drain to Slop Oil Slop Tank	28.88	48.13	38.50	0.0004	2887.50	4812.50	3850.00	0.0000	10	39	0.000	0.0000
SRU	D-2A	Amine Reflux Drum	Amine Reflux Drum Oil Skim Drain to A/B Oily Water Sump	28.88	48.13	38.50	0.0004	2887.50	4812.50	3850.00	0.0338	19	1,801	0.034	0.0000
SRU	D-2B	Amine Reflux Drum	Amine Reflux Drum Oil Skim Drain to A/B Oily Water Sump	28.88	48.13	38.50	0.0004	2887.50	4812.50	3850.00	0.0338	19	1,801	0.034	0.0000
SRU	D-2C	Amine Reflux Drum	Amine Reflux Drum Oil Skim Drain to Slop Oil Sump Tank	28.88	48.13	38.50	0.0004	2887.50	4812.50	3850.00	0.0309	17	1,801	0.031	0.0000
SRU	D-2D	Amine Reflux Drum	Amine Reflux Drum Oil Skim Drain to Slop Oil Sump Tank	28.88	48.13	38.50	0.0004	2887.50	4812.50	3850.00	0.0309	17	1,801	0.031	0.0000
SRU	D-3	Acid Gas Knockout Drum	Acid Gas Knockout Drum Drain to A/B Oily Water Sump	28.88	48.13	38.50	0.0001	2887.50	4812.50	3850.00	0.0000	2	39	0.000	0.0000
SRU	D-4	Flare Knockout Drum	Flare Knockout Drum Drain to Slop Oil Drain	28.88	48.13	38.50	0.0048	2887.50	4812.50	3850.00	0.4143	233	1,801	0.419	0.0000

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
SRU	E-15C	Incinerator Boiler	Incinerator Boiler Drain to Incinerator Boiler Blowdown Pit		X		X						X	11,940,665	0
SRU	E-15D	Incinerator Boiler	Incinerator Boiler Drain to Incinerator Boiler Blowdown Pit		X		X						X	11,940,665	0
SRU	E-201C	Scot Waste Heat Boiler	Scot Waste Heat Boiler Drain to Scot Boiler Blowdown Pit		X		X						X	2,089,616	0
SRU	E-201D	Scot Waste Heat Boiler	Scot Waste Heat Boiler Drain to Scot Boiler Blowdown Pit		X		X						X	2,089,616	0
SRU	E-7C-1/2	Claus Waste Heat Boiler (1st & 2nd Pass)	Claus Waste Heat Boiler to Claus Blowdown Pit		X		X						X	2,209,023	0
SRU	E-7D-1/2	Claus Waste Heat Boiler (1st & 2nd Pass)	Claus Waste Heat Boiler to Claus Blowdown Pit		X		X						X	2,209,023	0
SRU	E-8C-1/2/3	Sulfur Condensers	Sulfur Condenser Blowdown to Claus Boiler Blowdown Pit		X		X						X	5,333,497	0
SRU	E-8D-1/2/3	Sulfur Condensers	Sulfur Condenser Blowdown to Claus Boiler Blowdown Pit		X		X						X	5,333,497	0
SRU	Lube Oil Filters	K-2B Oil System Lube Oil Filters	K-2B Oil System Lube Oil Filter Changeouts to Used Oil Tote	X					X				X	0	61
SRU	Lube Oil Filters	K-2A Oil System Lube Oil Filters	K-2A Oil System Lube Oil Filter Changeouts to Used Oil Tote	X					X				X	0	61
SRU	NA	A/B Train Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sump		X		X						X	0	64
SRU	NA	C/D Train Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sump		X		X						X	0	64
SRU	T-1A	Amine Stripper	Amine Stripper Drain to A/B Oily Water Sump	X			X						X	0	2,727
SRU	T-1B	Amine Stripper	Amine Stripper Drain to A/B Oily Water Sump	X			X						X	0	2,727
SRU	TK-1	Lean Amine Surge & Storage Tank	Lean Amine Surge & Storage Tank Oil Skims to A/B Oily Water Sump	X			X						X	0	68,868
SRU	TK-100	Sour Water Feed Tank	Sour Water Feed Excess Sour Water to Deepwell	X		X							X	1,194,066,490	0
SRU	TK-100	Sour Water Feed Tank	Sour Water Feed Tank Oil Skim to Slop Header	X			X						X	365,447	6,040,839

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
SRU	E-15C	Incinerator Boiler	Incinerator Boiler Drain to Incinerator Boiler Blowdown Pit	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	11,941	0	0.000	0.0000
SRU	E-15D	Incinerator Boiler	Incinerator Boiler Drain to Incinerator Boiler Blowdown Pit	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	11,941	0	0.000	0.0000
SRU	E-201C	Scot Waste Heat Boiler	Scot Waste Heat Boiler Drain to Scot Boiler Blowdown Pit	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	2,090	0	0.000	0.0000
SRU	E-201D	Scot Waste Heat Boiler	Scot Waste Heat Boiler Drain to Scot Boiler Blowdown Pit	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	2,090	0	0.000	0.0000
SRU	E-7C-1/2	Claus Waste Heat Boiler (1st & 2nd Pass)	Claus Waste Heat Boiler to Claus Blowdown Pit	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	2,209	0	0.000	0.0000
SRU	E-7D-1/2	Claus Waste Heat Boiler (1st & 2nd Pass)	Claus Waste Heat Boiler to Claus Blowdown Pit	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	2,209	0	0.000	0.0000
SRU	E-8C-1/2/3	Sulfur Condensers	Sulfur Condenser Blowdown to Claus Boiler Blowdown Pit	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	5,333	0	0.000	0.0000
SRU	E-8D-1/2/3	Sulfur Condensers	Sulfur Condenser Blowdown to Claus Boiler Blowdown Pit	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	5,333	0	0.000	0.0000
SRU	Lube Oil Filters	K-2B Oil System Lube Oil Filters	K-2B Oil System Lube Oil Filter Changeouts to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
SRU	Lube Oil Filters	K-2A Oil System Lube Oil Filters	K-2A Oil System Lube Oil Filter Changeouts to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000
SRU	NA	A/B Train Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sump	0.00	0.00	0.00	0.0000	1975.00	3335.00	2655.00	0.0002	0	2,655	0.000	0.0002
SRU	NA	C/D Train Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sump	0.00	0.00	0.00	0.0000	1975.00	3335.00	2655.00	0.0002	0	2,655	0.000	0.0002
SRU	T-1A	Amine Stripper	Amine Stripper Drain to A/B Oily Water Sump	28.88	48.13	38.50	0.0000	2887.50	4812.50	3850.00	0.0105	3	3,850	0.010	0.0000
SRU	T-1B	Amine Stripper	Amine Stripper Drain to A/B Oily Water Sump	28.88	48.13	38.50	0.0000	2887.50	4812.50	3850.00	0.0105	3	3,850	0.010	0.0000
SRU	TK-1	Lean Amine Surge & Storage Tank	Lean Amine Surge & Storage Tank Oil Skims to A/B Oily Water Sump	28.88	48.13	38.50	0.0000	2887.50	4812.50	3850.00	0.2651	69	3,850	0.265	0.0000
SRU	TK-100	Sour Water Feed Tank	Sour Water Feed Excess Sour Water to Deepwell	1.35	1.65	1.50	1.7911	0.00	0.00	0.00	0.0000	1,194,066	2	1.791	0.0000
SRU	TK-100	Sour Water Feed Tank	Sour Water Feed Tank Oil Skim to Slop Header	0.00	0.00	0.00	0.0000	300.00	500.00	400.00	2.4163	6,406	377	2.416	0.0000

NOTE: Each line item is split across two pages.

Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
SRU	TK-101	Sweet Water Tank	Sweet Water Tank Excess Sweet Water to Deepwell		X		X						X	9,011,222	0
SRU	TK-101	Sweet Water Tank	Sweet Water Tank Oil Skim to Vacuum Truck	X			X						X	570	9,414
SRU	TK-2	Fresh Amine Storage Tank	Fresh Amine Storage Tank Condensate Blowdown Drain to Storm Sewer		X	X							X	1,990,111	0
SRU	TK-6	Flash Tank	Flash Tank Condensate Blowdown from Steam Boilers to Storm Sewer		X	X							X	19,901,108	0
SRU	TK-9	Lean Amine Surge & Storage Tank	Lean Amine Surge & Storage Tank Oil Skim Drain to Slop Oil Sump	X			X						X	0	103,301
Storm Water Diversions	EOL 1	End of Line #1 - Inlet to North Bay Lift Station 21	End of Line #1 - Inlet to North Bay Lift Station 21		X		X						X	0	0
Storm Water Diversions	EOL 2	End of Line #2 - Central and East Plant Outfall to Flume	End of Line #2 - Central and East Plant Outfall to Flume		X		X						X	4,171,488,276	0
Storm Water Diversions	EOL 4	LS 21 Backflow	LS 21 Backflow to Flume		X						X		X	3,400,714,800	0
Storm Water Diversions	EOL 4	End of Line #4 - Lift Station 4 and 5 Sump to Flume	End of Line #4 - Lift Station 4 and 5 Sump to Flume		X		X						X	1,929,004,762	0
ULC	100-CT-F	Cooling Tower	Cooling Tower Blowdown	X		X							X	386,081,498	0
ULC	100-F	Feed Surge Drum	Feed Surge Drum to Source Segregation Drum	X			X						X	1,244	117
ULC	100-L/ LA/ LB / LC	Feed Filters and Feed Coalescers	Feed Filters and Coalescers to Oily Water Sewer	X			X		X				X	12	1,034
ULC	101-E	Hydrogen Make-Up K.O. Drum	Wash Water Surge Drum to Source Segregation Drum	X			X						X	0	2,447
ULC	101-L/LA	Feed Coalescers	Feed Coalescers to Oily Water Sewer	X			X		X				X	3,471	983
ULC	102-LA /LB	Product Coalescers	Product Coalescers to Source Segregation Drum	X		X							X	295,531,456	2,537,391
ULC	103-F, ~~104-F, 105-F~~	Hydrogen Make-Up K.O. Drums	Hydrogen Make-Up K.O. Drums to Source Segregation Drum	X			X						X	27,026	2,553
ULC	104-J	Lube Oil Filter Change-out	Lube Oil filter Change-out to Used Oil Tote	X			X						X	0	192

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
SRU	TK-101	Sweet Water Tank	Sweet Water Tank Excess Sweet Water to Deepwell	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	9,011	0	0.000	0.0000
SRU	TK-101	Sweet Water Tank	Sweet Water Tank Oil Skim to Vacuum Truck	0.00	0.00	0.00	0.0000	300.00	500.00	400.00	0.0038	10	377	0.004	0.0000
SRU	TK-2	Fresh Amine Storage Tank	Fresh Amine Storage Tank Condensate Blowdown Drain to Storm Sewer	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	1,990	0	0.000	0.0000
SRU	TK-6	Flash Tank	Flash Tank Condensate Blowdown from Steam Boilers to Storm Sewer	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	19,901	0	0.000	0.0000
SRU	TK-9	Lean Amine Surge & Storage Tank	Lean Amine Surge & Storage Tank Oil Skim Drain to Slop Oil Sump	28.88	48.13	38.50	0.0000	2887.50	4812.50	3850.00	0.3977	103	3,850	0.398	0.0000
Storm Water Diversions	EOL 1	End of Line #1 - Inlet to North Bay Lift Station 21	End of Line #1 - Inlet to North Bay Lift Station 21	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	0	0	0.000	0.0000
Storm Water Diversions	EOL 2	End of Line #2 - Central and East Plant Outfall to Flume	End of Line #2 - Central and East Plant Outfall to Flume	0.00	4.36	0.41	1.4083	0.00	0.00	0.00	0.0000	4,171,488	0	0.000	1.4083
Storm Water Diversions	EOL 4	LS 21 Backflow	LS 21 Backflow to Flume	0.01	0.01	0.01	0.0218	0.00	0.00	0.00	0.0000	3,400,715	0	0.022	0.0218
Storm Water Diversions	EOL 4	End of Line #4 - Lift Station 4 and 5 Sump to Flume	End of Line #4 - Lift Station 4 and 5 Sump to Flume	0.004	5.55	0.27	0.4309	0.00	0.00	0.00	0.0000	1,929,005	0	0.000	0.4309
ULC	100-CT-F	Cooling Tower	Cooling Tower Blowdown	0.00	0.00	0.00	0.0004	0.00	0.00	0.00	0.0000	386,081	0	0.000	0.0000
ULC	100-F	Feed Surge Drum	Feed Surge Drum to Source Segregation Drum	0.00	0.00	645.00	0.0008	180.00	220.00	200.00	0.0000	1	607	0.001	0.0000
ULC	100-L/ LA/ LB / LC	Feed Filters and Feed Coalescers	Feed Filters and Coalescers to Oily Water Sewer	1.60	2.20	1.80	0.0000	160.00	220.00	180.00	0.0002	1	178	0.000	0.0000
ULC	101-E	Hydrogen Make-Up K.O. Drum	Wash Water Surge Drum to Source Segregation Drum	27.00	43.00	35.00	0.0000	135000.00	165000.00	150000.00	0.3671	2	150,000	0.367	0.0000
ULC	101-L/LA	Feed Coalescers	Feed Coalescers to Oily Water Sewer	1.60	2.20	1.80	0.0000	160.00	220.00	180.00	0.0002	4	41	0.000	0.0000
ULC	102-LA /LB	Product Coalescers	Product Coalescers to Source Segregation Drum	24.00	27.00	25.50	7.5361	6500.00	7100.00	6800.00	17.2543	298,069	83	24.790	0.0000
ULC	103-F, ~~104-F, 105-F~~	Hydrogen Make-Up K.O. Drums	Hydrogen Make-Up K.O. Drums to Source Segregation Drum	27.00	43.00	35.00	0.0009	135000.00	165000.00	150000.00	0.3829	30	12,976	0.384	0.0000
ULC	104-J	Lube Oil Filter Change-out	Lube Oil filter Change-out to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	0	5	0.000	0.0000

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Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
ULC	112-E	Hydrogen Make-Up Scrubbers	Hydrogen Make-Up Scrubbers to Water Degassing Drum	X									X	34,546	297
ULC	112-F	Low Pressure Separator	Low Pressure Separator to Degassing Drum	X		X							X	17,337,845	148,860
ULC	113-F	Debutanizer OVHD Accumulator	Debutanizer OVHD Accumulator To Degassing Drum	X			X						X	8,581,358	148,860
ULC	117-F	First R.O.D. BTM Water Draw Off Drum	First R.O.D. BTM Water Draw Off Drum to Degassing Drum	X		X							X	8,581,358	148,860
ULC	118-F	Second R.O.D. BTM Water Draw Off Drum	Second R.O.D. BTM Water Draw Off Drum to Degassing Drum	X		X							X	8,581,358	148,860
ULC	119-L/LA	Propane Filters	Propane Filters to Oily Water Sewer	X			X						X	0	6
ULC	127-FB	Flare K.O. Drum	Flare K.O. Drum to Light Slop	X			X						X	12,319	198,948
ULC	130-F	Flash Gas K.O. Drum	Flash K.O. Drum to Source Segregation Drum	X			X						X	5,848	50
ULC	132-F	Depropanizer Overhead Accumulator Water Drawoff Drum	Water Drawoff Drum to Degassing Drum	X			X						X	17,337,845	87,565
ULC	140-F	Sour Fuel Gas K.O. Drum	Sour Fuel Gas K.O. Drum to Source Segregation Drum	X			X						X	0	386
ULC	143-F	UU4 and UU3 K.O. Drum	UU3 and UU4 K.O. Drum to Light Slop	X			X						X	7,960	331,552
ULC	100-BA/BB	Fuel Gas Strainers	Fuel Gas Strainer Change Outs to Light Slop	X			X						X	1	1
ULC	104-BA/BB	Fuel Gas Strainers	Fuel Gas Strainer Change Outs to Light Slop	X			X						X	1	1
ULC	105-BA/BB	Fuel Gas Strainers	Fuel Gas Strainer Change Outs to Light Slop	X			X						X	1	1
ULC	153-F	Weathering Drum	Weathering Drum to Oily Water Sewer	X			X						X	26,258	691
ULC	156-F	Fuel Gas K. O. Drum	Fuel K.O. Drum to Pump Out Drum	X			X						X	48,714	34,100
ULC	159-F	Hydrogen Make-Up	Hydrogen Make-Up to Pump Out Drum	X			X				X		X	375	3

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
ULC	112-E	Hydrogen Make-Up Scrubbers	Hydrogen Make-Up Scrubbers to Water Degassing Drum	27.00	43.00	35.00	0.0012	135000.00	165000.00	150000.00	0.0445	35	1,312	0.046	0.0000
ULC	112-F	Low Pressure Separator	Low Pressure Separator to Degassing Drum	15.00	16.00	15.50	0.2687	16200.00	19800.00	18000.00	2.6795	17,487	169	2.948	0.0000
ULC	113-F	Debutanizer OVHD Accumulator	Debutanizer OVHD Accumulator To Degassing Drum	0.12	0.20	0.17	0.0014	12.00	20.00	16.67	0.0025	8,730	0	0.004	0.0000
ULC	117-F	First R.O.D. BTM Water Draw Off Drum	First R.O.D. BTM Water Draw Off Drum to Degassing Drum	5.20	35.00	20.10	0.1725	16920.00	20680.00	18800.00	2.7986	8,730	340	2.971	0.0000
ULC	118-F	Second R.O.D. BTM Water Draw Off Drum	Second R.O.D. BTM Water Draw Off Drum to Degassing Drum	5.20	35.00	20.10	0.1725	16920.00	20680.00	18800.00	2.7986	8,730	340	2.971	0.0000
ULC	119-L/LA	Propane Filters	Propane Filters to Oily Water Sewer	0.90	1.10	1.00	0.0000	90.00	110.00	100.00	0.0000	0	100	0.000	0.0000
ULC	127-FB	Flare K.O. Drum	Flare K.O. Drum to Light Slop	1.10	1.90	1.50	0.0000	6120.00	7480.00	6800.00	1.3528	211	6,404	1.353	0.0000
ULC	130-F	Flash Gas K.O. Drum	Flash K.O. Drum to Source Segregation Drum	0.07	14.00	7.04	0.0000	7.40	1400.00	703.70	0.0000	6	13	0.000	0.0000
ULC	132-F	Depropanizer Overhead Accumulator Water Drawoff Drum	Water Drawoff Drum to Degassing Drum	0.45	0.74	0.60	0.0103	90.00	110.00	100.00	0.0088	17,425	1	0.019	0.0000
ULC	140-F	Sour Fuel Gas K.O. Drum	Sour Fuel Gas K.O. Drum to Source Segregation Drum	0.00	0.00	0.00	0.0000	200.00	540.00	326.67	0.0001	0	327	0.000	0.0000
ULC	143-F	UU4 and UU3 K.O. Drum	UU3 and UU4 K.O. Drum to Light Slop	19.00	97.00	51.00	0.0004	1900.00	9700.00	5100.00	1.6909	340	4,982	1.691	0.0000
ULC	100-BA/BB	Fuel Gas Strainers	Fuel Gas Strainer Change Outs to Light Slop	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	0	9	0.000	0.0000
ULC	104-BA/BB	Fuel Gas Strainers	Fuel Gas Strainer Change Outs to Light Slop	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	0	9	0.000	0.0000
ULC	105-BA/BB	Fuel Gas Strainers	Fuel Gas Strainer Change Outs to Light Slop	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	0	9	0.000	0.0000
ULC	153-F	Weathering Drum	Weathering Drum to Oily Water Sewer	0.00	0.00	0.00	0.0000	90.00	110.00	100.00	0.0001	27	3	0.000	0.0000
ULC	156-F	Fuel Gas K. O. Drum	Fuel K.O. Drum to Pump Out Drum	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0007	83	9	0.001	0.0000
ULC	159-F	Hydrogen Make-Up	Hydrogen Make-Up to Pump Out Drum	0.00	0.00	0.00	0.0000	43.20	52.80	48.00	0.0000	0	0	0.000	0.0000

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
ULC	160-FD /161-FD and 162-FD	Hydrogen Make-Up K.O. Drums	Hydrogen Make-Up K.O. Drums to Pump Out Drum	X			X						X	375	3
ULC	~~171-FE to 174-FE~~ 171-FE/172-FE	Hydrogen Make-Up Suction Drain Pots	Hydrogen Make-Up Suction Drain Pots to Oily Water Sewer		X		X						X	375	3
ULC	171-L/LA	Hydrogen Make-Up Knock Out Filters	Hydrogen Make-Up KO Filters to Flare KO Drum	X			X		X				X	0	5,444
ULC	211-L	Coalescer	Coalescer Drained to Oily Water Sewer	X			X						X	1,244	69
ULC	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer		X		X						X	0	64
UU3	307-LA/LB	Coalescer Filters	Coalescer Filters changeout to OWS	X					X				X	21,264	17,011
UU3	301- L/LA	Heavy Virgin Naphtha Charge Filters	Heavy Virgin Naphtha Charge Filters Change-Outs to Pump Out Header	X					X				X	6,406	5,509
UU3	301-F	Ultrafiner Furnace Charge Drum	Ultrafiner Furnace Charge Drum to Degassing Drum	X			X						X	109,456	884
UU3	302- L/LA	Heavy Virgin Naphtha Charge Filters	Heavy Virgin Naphtha Charge Filters Change-Outs to Pump Out Header	X					X				X	6,406	5,509
UU3	302-F	Ultrafiner Effluent Separator	Ultrafiner Effluent Separator to Process Water Header	X			X						X	321,171	2,595
UU3	303-F	Ultrafiner H2S Stripper Reflux Drum	Ultrafiner H2S Stripper Reflux Drum Water Draw off to Degassing Drum	X			X						X	340,096	2,748
UU3	305-F	Prefractionator Reflux Drum	Prefractionator Reflux Drum to Oily Water Sewer		X		X						X	23	19
UU3	306-L	Debutanizer Feed Coalescer	Debutanizer Feed Coalescer to Degassing Drum	X			X						X	59,106,291	477,627
UU3	309-E	Caustic Scrubber Tower	Caustic Scrubber to Degassing Drum	X			X						X	7,831	0
UU3	314-F	Natural Gas Receiver	Natural Gas Receiver to RV Knockout Drum	X			X						X	57	40
UU3	319-F	Caustic Scrubber Drum	Caustic Scrubber Drum to Deepwells	X		X							X	407,973	0
UU3	320-F	Debutanizer Reflux Drum	Debutanizer Reflux Drum to Degassing Drum	X			X						X	510,144	4,380

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
ULC	160-FD /161-FD and 162-FD	Hydrogen Make-Up K.O. Drums	Hydrogen Make-Up K.O. Drums to Pump Out Drum	0.00	0.00	0.00	0.0000	7781.25	10375.00	8300.00	0.0000	0	71	0.000	0.0000
ULC	~~171-FE to 174-FE~~ 171-FE/172-FE	Hydrogen Make-Up Suction Drain Pots	Hydrogen Make-Up Suction Drain Pots to Oily Water Sewer	0.00	0.00	0.00	0.0000	7781.25	10375.00	8300.00	0.0000	0	71	0.000	0.0000
ULC	171-L/LA	Hydrogen Make-Up Knock Out Filters	Hydrogen Make-Up KO Filters to Flare KO Drum	0.00	0.00	0.00	0.0000	43.20	52.80	48.00	0.0003	5	48	0.000	0.0000
ULC	211-L	Coalescer	Coalescer Drained to Oily Water Sewer	0.90	1.10	1.00	0.0000	90.00	110.00	100.00	0.0000	1	6	0.000	0.0000
ULC	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	0.00	0.00	0.00	0.0000	51840.00	63360.00	57600.00	0.0037	0	57,600	0.004	0.0037
UU3	307-LA/LB	Coalescer Filters	Coalescer Filters changeout to OWS	52.20	63.80	58.00	0.0012	22860.00	27940.00	25400.00	0.4321	38	11,321	0.433	0.0000
UU3	301- L/LA	Heavy Virgin Naphtha Charge Filters	Heavy Virgin Naphtha Charge Filters Change-Outs to Pump Out Header	180.00	220.00	200.00	0.0013	18000.00	22000.00	20000.00	0.1102	12	9,355	0.111	0.0000
UU3	301-F	Ultrafiner Furnace Charge Drum	Ultrafiner Furnace Charge Drum to Degassing Drum	45.00	55.00	50.00	0.0055	17640.00	21560.00	19600.00	0.0173	110	207	0.023	0.0000
UU3	302- L/LA	Heavy Virgin Naphtha Charge Filters	Heavy Virgin Naphtha Charge Filters Change-Outs to Pump Out Header	180.00	220.00	200.00	0.0013	18000.00	22000.00	20000.00	0.1102	12	9,355	0.111	0.0000
UU3	302-F	Ultrafiner Effluent Separator	Ultrafiner Effluent Separator to Process Water Header	45.00	55.00	50.00	0.0161	18450.00	22550.00	20500.00	0.0532	324	214	0.069	0.0000
UU3	303-F	Ultrafiner H2S Stripper Reflux Drum	Ultrafiner H2S Stripper Reflux Drum Water Draw off to Degassing Drum	13.50	16.50	15.00	0.0051	5760.00	7040.00	6400.00	0.0176	343	66	0.023	0.0000
UU3	305-F	Prefractionator Reflux Drum	Prefractionator Reflux Drum to Oily Water Sewer	0.00	0.00	1.17	0.0000	8775.00	14625.00	11700.00	0.0002	0	5,376	0.000	0.0002
UU3	306-L	Debutanizer Feed Coalescer	Debutanizer Feed Coalescer to Degassing Drum	52.20	63.80	58.00	3.4282	22860.00	27940.00	25400.00	12.1317	59,584	261	15.560	0.0000
UU3	309-E	Caustic Scrubber Tower	Caustic Scrubber to Degassing Drum	45.00	55.00	50.00	0.0004	0.00	0.00	0.00	0.0000	8	50	0.000	0.0000
UU3	314-F	Natural Gas Receiver	Natural Gas Receiver to RV Knockout Drum	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	0	9	0.000	0.0000
UU3	319-F	Caustic Scrubber Drum	Caustic Scrubber Drum to Deepwells	5.00	20.00	15.00	0.0061	0.00	0.00	0.00	0.0000	408	15	0.006	0.0000
UU3	320-F	Debutanizer Reflux Drum	Debutanizer Reflux Drum to Degassing Drum	30.88	37.74	34.31	0.0175	3087.90	3774.10	3431.00	0.0150	515	63	0.033	0.0000

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
UU3	320-L/LA	Cat Naphtha Charge Filters	Heavy Virgin Naphtha Charge Filters Change-Outs to Pump Out Header	X					X				X	6,406	5,125
UU3	321-F	Depropanizer Reflux Drum	Depropanizer Reflux Drum to Oily Water Sewer	X			X						X	27,128	233
UU3	322-L/LA	Fuel Gas Filter	Fuel Gas Filter to Degassing Drum	X			X						X	126,985	88,889
UU3	324-L	Compressor Suction Filter	Compressor Suction Filter Drain to Degassing Drum	X			X						X	0	11,056
UU3	325-L	Compressor Suction Filter	Compressor Suction Filter Drain to Degassing Drum	X			X						X	0	11,056
UU3	326-F	Fuel Gas Knockout Drum	Fuel Gas Knockout Drum to Degassing Drum	X			X						X	207,303	48,371
UU3	329-L	360-J Compressor Suction Liquid Pot	360-J Compressor Suction Liquid Drum to Degassing Drum	X			X						X	0	9,021
UU3	329-LA	360-J Compressor Suction Liquid Pot	360-J Compressor Suction Liquid Drum to Degassing Drum	X			X						X	0	9,021
UU3	336-F	Fuel Gas Knockout Drum	Fuel Gas Knockout Drum to Blowdown Drum	X			X						X	57	40
UU3	337-F	Compressor Suction K.O. Drum	Compressor Suction K.O. Drum to Degassing Drum	X			X						X	118	9,968
UU3	360-J	360-J Compressor Discharge Bottle Snubbers (2)	360-J Compressor Discharge Bottle Snubber to Degassing Drum	X			X						X	0	18,042
UU3	360-JA	360-JA Compressor Lube Oil	360-JA Compressor Lube Oil Discharge to Oil Water Sewer	X			X						X	0	113,879
UU3	360-JA	360-JA Compressor Discharge Bottle Snubbers (2)	360-JA Compressor Discharge Bottle Snubber to Degassing Drum	X			X						X	0	18,042
UU3	701-U	UU3 Cooling Tower	UU3 Cooling Tower Blowdown		X	X							X	157,218,754	0
UU3	NA	Lube Oil Reservoir	Lube Oil Reservoir Spent Lube Oil to Used Oil Tote	X			X						X	0	1,515
UU3	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	X			X						X	0	64

NOTE: Each line item is split across two pages.

Table 1

Benzene Waste Operations NESHAPS (40 CFR Part 61, Subpart FF) Annual Report - Calendar Year 2019
Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
UU3	320-L/LA	Cat Naphtha Charge Filters	Heavy Virgin Naphtha Charge Filters Change-Outs to Pump Out Header	45.00	55.00	50.00	0.0003	17640.00	21560.00	19600.00	0.1005	12	8,739	0.101	0.0000
UU3	321-F	Depropanizer Reflux Drum	Depropanizer Reflux Drum to Oily Water Sewer	13.50	16.50	15.00	0.0004	6120.00	7480.00	6800.00	0.0016	27	73	0.002	0.0000
UU3	322-L/LA	Fuel Gas Filter	Fuel Gas Filter to Degassing Drum	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0018	216	9	0.002	0.0000
UU3	324-L	Compressor Suction Filter	Compressor Suction Filter Drain to Degassing Drum	0.00	0.00	0.00	0.0000	27000.00	33000.00	30000.00	0.3317	11	30,000	0.332	0.0000
UU3	325-L	Compressor Suction Filter	Compressor Suction Filter Drain to Degassing Drum	0.00	0.00	0.00	0.0000	27000.00	33000.00	30000.00	0.3317	11	30,000	0.332	0.0000
UU3	326-F	Fuel Gas Knockout Drum	Fuel Gas Knockout Drum to Degassing Drum	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0010	256	4	0.001	0.0000
UU3	329-L	360-J Compressor Suction Liquid Pot	360-J Compressor Suction Liquid Drum to Degassing Drum	0.00	0.00	0.00	0.0000	27000.00	33000.00	30000.00	0.2706	9	30,000	0.271	0.0000
UU3	329-LA	360-J Compressor Suction Liquid Pot	360-J Compressor Suction Liquid Drum to Degassing Drum	0.00	0.00	0.00	0.0000	27000.00	33000.00	30000.00	0.2706	9	30,000	0.271	0.0000
UU3	336-F	Fuel Gas Knockout Drum	Fuel Gas Knockout Drum to Blowdown Drum	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	0	9	0.000	0.0000
UU3	337-F	Compressor Suction K.O. Drum	Compressor Suction K.O. Drum to Degassing Drum	17.10	20.90	19.00	0.0000	43200.00	52800.00	48000.00	0.4785	10	47,437	0.478	0.0000
UU3	360-J	360-J Compressor Discharge Bottle Snubbers (2)	360-J Compressor Discharge Bottle Snubber to Degassing Drum	0.00	0.00	0.00	0.0000	27000.00	33000.00	30000.00	0.5413	18	30,000	0.541	0.0000
UU3	360-JA	360-JA Compressor Lube Oil	360-JA Compressor Lube Oil Discharge to Oil Water Sewer	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0006	114	5	0.001	0.0000
UU3	360-JA	360-JA Compressor Discharge Bottle Snubbers (2)	360-JA Compressor Discharge Bottle Snubber to Degassing Drum	0.00	0.00	0.00	0.0000	27000.00	33000.00	30000.00	0.5413	18	30,000	0.541	0.0000
UU3	701-U	UU3 Cooling Tower	UU3 Cooling Tower Blowdown	0.00	0.00	0.00	0.0002	0.00	0.00	0.00	0.0000	157,219	0	0.000	0.0002
UU3	NA	Lube Oil Reservoir	Lube Oil Reservoir Spent Lube Oil to Used Oil Tote	0.00	0.10	0.05	0.0000	0.00	10.00	5.00	0.0000	2	5	0.000	0.0000
UU3	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	210.75	351.25	281.00	0.0000	43200.00	52800.00	48000.00	0.0031	0	48,000	0.003	0.0000

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
UU4	B-406	Ultrafiner Furnace	Ultrafiner Furnace Fuel Gas KO to Oily Water Sewer	X			X						X	691	484
UU4	C-432	Depropanizer Reboiler	Depropanizer Reboiler to Oil-Water Separator (NESHAP Drum)	X			X						X	1,079	34
UU4	E-407	Sponge Absorber	Sponge Absorber to F-450 NESHAP Drum	X			X						X	20,787,397	1,847,769
UU4	F-401	Ultrafiner Feed Drum	Ultrafiner Feed Drum Drain to Oil-Water Separator (NESHAP Drum)	X			X						X	9,951	940
UU4	F-402	Light Ends Stripper Reflux Drum	Light Ends Stripper Reflux Drum Drain to Oil-Water Separator (NESHAP Drum)	X			X						X	199,011	18,795
UU4	F-404	Debutanizer Reflux Drum	Debutanizer Reflux Drum Drain to Oil-Water Separator (NESHAP Drum)	X			X						X	3,103,080	25,075
UU4	F-408	Natural Gas Knockout Drum	Natural Gas Knockout Drum Liquids to Oil-Water Separator (NESHAP Drum)	X			X						X	76	0
UU4	F-411	Fuel Gas Knock Drum	Fuel Gas Knock Drum Drain to Oil-Water Separator (NESHAP Drum)	X			X						X	232,180	162,526
UU4	F-413	RV Knockout Drum	RV Knockout Drum Drain to Heavy Slop	X			X						X	0	7,960
UU4	F-434	Depropanizer Reflux Drum	Depropanizer Reflux Drum Drain to Oil-Water Separator (NESHAP Drum)	X			X						X	160,758	974
UU4	F-437	RG Centrifix Knockout Drum	RG Centrifix Knockout Drum Drain to Oil-Water Separator (NESHAP Drum)	X			X						X	0	22,112
UU4	F-455	Caustic Scrubber Drum	Caustic Scrubber Drum Spent Caustic to Deep Wells	X			X						X	2,719,818	0
UU4	J-412	Compressor	Compressor Seal Oil to Oil-Water Separator (NESHAP Drum)	X			X						X	0	62,191
UU4	M402 M402A	HSR Feed Filter	HSR Feed Filter Drain to Oil-Water Separator (NESHAP Drum)	X			X						X	0	10,210
UU4	M402 M402A	HSR Feed Filter	HSR Feed Filter Steam-out to Oil-Water Separator (NESHAP Drum)	X			X						X	900	8
UU4	M-410	Debutanizer Feed Coalescer	Debutanizer Feed Coalescer Vent to Oil-Water Separator (NESHAP Drum)	X		X							X	26,863,809	217,081
UU4	M-422A/B	Feed Filters	Feed Filters Changeout to Oil-Water Separator (NESHAP Drum)	X			X						X	0	6,807

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
UU4	B-406	Ultrafiner Furnace	Ultrafiner Furnace Fuel Gas KO to Oily Water Sewer	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0000	1	9	0.000	0.0000
UU4	C-432	Depropanizer Reboiler	Depropanizer Reboiler to Oil-Water Separator (NESHAP Drum)	0.08	0.13	0.10	0.0000	7.50	12.50	10.00	0.0000	1	0	0.000	0.0000
UU4	E-407	Sponge Absorber	Sponge Absorber to F-450 NESHAP Drum	0.00	10.00	5.00	0.1039	200.00	420.00	310.00	0.5728	22,635	30	0.677	0.0000
UU4	F-401	Ultrafiner Feed Drum	Ultrafiner Feed Drum Drain to Oil-Water Separator (NESHAP Drum)	400.00	500.00	450.00	0.0045	40000.00	50000.00	45000.00	0.0423	11	4,294	0.047	0.0000
UU4	F-402	Light Ends Stripper Reflux Drum	Light Ends Stripper Reflux Drum Drain to Oil-Water Separator (NESHAP Drum)	400.00	500.00	450.00	0.0896	40000.00	50000.00	45000.00	0.8458	218	4,294	0.935	0.0000
UU4	F-404	Debutanizer Reflux Drum	Debutanizer Reflux Drum Drain to Oil-Water Separator (NESHAP Drum)	165.00	275.00	220.00	0.6827	16500.00	27500.00	22000.00	0.5517	3,128	395	1.234	0.0000
UU4	F-408	Natural Gas Knockout Drum	Natural Gas Knockout Drum Liquids to Oil-Water Separator (NESHAP Drum)	0.00	0.00	0.00	0.0000	0.00	0.00	0.00	0.0000	0	0	0.000	0.0000
UU4	F-411	Fuel Gas Knock Drum	Fuel Gas Knock Drum Drain to Oil-Water Separator (NESHAP Drum)	0.07	0.32	0.21	0.0000	6.80	32.00	20.60	0.0033	395	9	0.003	0.0000
UU4	F-413	RV Knockout Drum	RV Knockout Drum Drain to Heavy Slop	177.00	295.00	236.00	0.0000	84750.00	141250.00	113000.00	0.8995	8	113,000	0.900	0.0000
UU4	F-434	Depropanizer Reflux Drum	Depropanizer Reflux Drum Drain to Oil-Water Separator (NESHAP Drum)	0.08	0.13	0.10	0.0000	7.50	12.50	10.00	0.0000	162	0	0.000	0.0000
UU4	F-437	RG Centrifix Knockout Drum	RG Centrifix Knockout Drum Drain to Oil-Water Separator (NESHAP Drum)	177.00	295.00	236.00	0.0000	84750.00	141250.00	113000.00	2.4987	22	113,000	2.499	0.0000
UU4	F-455	Caustic Scrubber Drum	Caustic Scrubber Drum Spent Caustic to Deep Wells	5.00	20.00	15.00	0.0408	0.00	0.00	0.00	0.0000	2,720	15	0.041	0.0000
UU4	J-412	Compressor	Compressor Seal Oil to Oil-Water Separator (NESHAP Drum)	0.00	0.00	0.00	0.0000	30000.00	50000.00	40000.00	2.4876	62	40,000	2.488	0.0000
UU4	M402 M402A	HSR Feed Filter	HSR Feed Filter Drain to Oil-Water Separator (NESHAP Drum)	400.00	500.00	450.00	0.0000	40000.00	50000.00	45000.00	0.4595	10	45,000	0.459	0.0000
UU4	M402 M402A	HSR Feed Filter	HSR Feed Filter Steam-out to Oil-Water Separator (NESHAP Drum)	400.00	500.00	450.00	0.0004	40000.00	50000.00	45000.00	0.0003	1	829	0.001	0.0000
UU4	M-410	Debutanizer Feed Coalescer	Debutanizer Feed Coalescer Vent to Oil-Water Separator (NESHAP Drum)	150.00	250.00	200.00	5.3728	84750.00	141250.00	113000.00	24.5302	27,081	1,104	29.903	0.0000
UU4	M-422A/B	Feed Filters	Feed Filters Changeout to Oil-Water Separator (NESHAP Drum)	38.00	105.00	71.50	0.0000	13725.00	22875.00	18300.00	0.1246	7	18,300	0.125	0.0000

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification						Flow Rate Information									
Process Unit	Vessel or Equipment		Stream	Benzene Controls		Waste Stream Flow Type						Water Content		Aqueous Phase Mass Flow	Organic Phase Mass Flow
Name	Equipment No.	Name	Description	YES	NO	Normal Continuous	Normal Intermittent	Upset	Maintenance	Turnaround	Not Typical Line Up/Not Used	<10%	>10%	(kg/yr)	(kg/yr)
UU4	M-430A	D-407 Reactor Feed Filter	Reactor Feed Filter Drain to Oil-Water Separator (NESHAP Drum)	X			X						X	0	84,540
UU4	M-430A	D-407 Reactor Feed Filter	Reactor Feed Filter Steam-out to Oil-Water Separator (NESHAP Drum)	X			X						X	3,909	34
UU4	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	X			X						X	0	61
UU4	U-401	Cooling Tower	Cooling Tower Blowdown to Sewer	X		X							X	270,655,071	0
Vac Trucks	Vac Trucks	Controlled Vac Truck Wastes	Controlled Vacuum Truck Wastes	X					X				X	12,019,531	12,019,531
Vac Trucks	Vac Trucks	Uncontrolled Vac Truck Wastes	Uncontrolled Vacuum Truck Wastes		X				X				X	579,245	125,121
Vessels	Vessels	Controlled Vessel Maintenance	Controlled Vessel Maintenance	X					X				X	0	2,153,117
Vessels	Vessels	Uncontrolled Vessel Maintenance	Uncontrolled Vessel Maintenance		X				X				X	0	26,406
Vessels TAR	Vessels	Controlled Vessel Maintenance	Controlled Vessel Maintenance TAR	X					X				X	0	5,369.80
Vessels TAR	Vessels	Uncontrolled Vessel Maintenance	Uncontrolled Vessel Maintenance TAR		X				X				X	0	204.68
WSOS	Wastes Shipped Off-Site	Controlled Wastes Shipped Off-Site	Controlled Wastes Shipped Off-Site	X			X						X	0	4,155,405
WSOS	Wastes Shipped Off-Site	Uncontrolled Wastes Shipped Off-Site	Uncontrolled Wastes Shipped Off-Site		X		X						X	0	6,597,519
Temp Ops	Temp Ops	Temp Ops	Temporary Ops	X	X		X						X	NA	NA

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Blanchard Refining Company LLC - Galveston Bay Refinery East/West Plant

General/Identification				Stream Phase											
Process Unit	Vessel or Equipment		Stream	Aqueous Phase				Organic Phase				Stream Annual Waste Quantity (Mg/yr)	Stream Flow Wt. Benzene Conc. (ppmw)	TAB (Mg/yr)	6 BQ (Mg/yr)
				Benzene Concentration (ppmw)			BQ (Mg/yr)	Benzene Concentration (ppmw)			BQ (Mg/yr)				
Name	Equipment No.	Name	Description	Min.	Max.	Avg.		Min.	Max.	Avg.					
UU4	M-430A	D-407 Reactor Feed Filter	Reactor Feed Filter Drain to Oil Water Separator (NESHAP Drum)	400.00	500.00	450.00	0.0000	40000.00	50000.00	45000.00	3.8043	85	45,000	3.804	0.0000
UU4	M-430A	D-407 Reactor Feed Filter	Reactor Feed Filter Steam-out to Oil-Water Separator (NESHAP Drum)	400.00	500.00	450.00	0.0018	40000.00	50000.00	45000.00	0.0015	4	829	0.003	0.0000
UU4	NA	Sight Glass and Level Gauge Instruments	Sight Glass and Level Gauge Instrument Drains to Oily Water Sewer	177.00	295.00	236.00	0.0000	84750.00	141250.00	113000.00	0.0068	0	113,000	0.007	0.0000
UU4	U-401	Cooling Tower	Cooling Tower Blowdown to Sewer	0.00	0.00	0.00	0.0003	0.00	0.00	0.00	0.0000	270,655	0	0.000	0.0000
Vac Trucks	Vac Trucks	Controlled Vac Truck Wastes	Controlled Vacuum Truck Wastes	0.00	0.00	0.00	2.6063	0.00	1,000,000	0	0.0000	24,039	0	2.6	0.0000
Vac Trucks	Vac Trucks	Uncontrolled Vac Truck Wastes	Uncontrolled Vacuum Truck Wastes	0.00	0.00	0.00	0.0000	0.00	1,000,000	0	0.1163	704	0	0.116	0.1163
Vessels	Vessels	Controlled Vessel Maintenance	Controlled Vessel Maintenance	0.00	0.00	0.00	0.0000	0.00	1,000,000	1,968	4.2377	2,153	1,968	4.238	0.0000
Vessels	Vessels	Uncontrolled Vessel Maintenance	Uncontrolled Vessel Maintenance	0.00	0.00	0.00	0.0000	0.00	1,000,000	0	0.0000	26	0	0.000	0.0000
Vessels TAR	Vessels	Controlled Vessel Maintenance	Controlled Vessel Maintenance TAR	0.00	0.00	0.00	0.0000	0.00	1,000,000	242	1	5	242	1.298	0.0000
Vessels TAR	Vessels	Uncontrolled Vessel Maintenance	Uncontrolled Vessel Maintenance TAR	0.00	0.00	0.00	0.0000	0.00	1,000,000	11	0.0022	0	11	0.002	0.0022
WSOS	Wastes Shipped Off-Site	Controlled Wastes Shipped Off-Site	Controlled Wastes Shipped Off-Site	0.00	0.00	0.00	0.0000	10.00	1,447	9.29	0.0386	4,155	9	0.039	0.0000
WSOS	Wastes Shipped Off-Site	Uncontrolled Wastes Shipped Off-Site	Uncontrolled Wastes Shipped Off-Site	0.00	0.00	0.00	0.0000	0.01	5.40	12.56	0.0829	6,598	13	0.083	0.0829
Temp Ops	Temp Ops	Temp Ops	Temporary Ops	NA	NA	NA	0.0003	NA	NA	NA	0.0000	NA	NA	0.000	0.0003

NOTE: Each line item is split across two pages.

Table 2

BWON Inspection and Monitoring Exceptions [§61.357(d)(8)]

Table 2
BWON Inspection and Monitoring Exceptions
61.357(d)(8)

Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ULC	1273	DRAIN	01/02/2019	01/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1287	DRAIN	01/02/2019	01/04/2019	Visual	DRY	ADD WATER
ULC	1300	DRAIN	01/03/2019	01/04/2019	Visual	DRY	ADD WATER
ULC	1301	DRAIN	01/03/2019	01/04/2019	Visual	DRY	ADD WATER
ULC	1318	DRAIN	01/03/2019	01/04/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ULC	1360	DRAIN	01/03/2019	01/04/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU4	206970R	VENT	01/03/2019	01/08/2019	Visual	TRIPPED	RESET
ARU	901748RA	VENT	01/03/2019	01/03/2019	Visual	TRIPPED	RESET
ULC	1472	DRAIN	01/03/2019	01/03/2019	Visual	DRY	ADD WATER
ULC	1495	DRAIN	01/03/2019	01/08/2019	Visual	DRY	ADD WATER
COKERS	901675R	VENT	01/03/2019	01/07/2019	Visual	INDICATOR BROKEN	UNFROZE INDICATOR/ RESET
ULC	1507	DRAIN	01/03/2019	01/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1530	DRAIN	01/03/2019	01/03/2019	Visual	DEBRIS	CLEANED OUT
PS3B	Rik901674RA	VENT	01/03/2019	01/03/2019	Visual	TRIPPED	RESET
ULC	1539	DRAIN	01/03/2019	01/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RE2	VENT	01/03/2019	01/03/2019	Visual	TRIPPED	RESET
ENVFAC	901447RE	VENT	01/04/2019	01/04/2019	Visual	TRIPPED	RESET
ULC	1579	DRAIN	01/04/2019	01/15/2019	Visual	CLOGGED	CLEANED/ ADD WATER
RHU	5364	DRAIN	01/04/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RA	VENT	01/04/2019	01/04/2019	Visual	TRIPPED	RESET
ENVFAC	901717R	VENT	01/04/2019	02/07/2019	Visual	INDICATOR BROKEN	REPLACED INDICATOR
ENVFAC	901450R	VENT	01/04/2019	01/29/2019	Visual	INDICATOR BROKEN	REPLACED INDICATOR
ENVFAC	901481R	VENT	01/04/2019	02/07/2019	Visual	INDICATOR BROKEN	REPLACED INDICATOR
RHU	6812	VENT	01/07/2019	01/07/2019	Visual	TRIPPED	RESET
CFHU	6796AB	VENT	01/07/2019	01/07/2019	Visual	TRIPPED	RESET
RHU	901699R	VENT	01/07/2019	02/18/2019	Visual	INDICATOR BROKEN	REPLACED INDICATOR
COKERS	901690RA	VENT	01/07/2019	01/07/2019	Visual	TRIPPED	RESET
UU4	23	DRAIN	01/07/2019	01/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	27	DRAIN	01/07/2019	01/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	28	DRAIN	01/07/2019	01/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	29	DRAIN	01/07/2019	01/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	31	DRAIN	01/07/2019	01/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	32	DRAIN	01/07/2019	01/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	37	DRAIN	01/07/2019	01/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	38	DRAIN	01/07/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	40	DRAIN	01/07/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU4	43	DRAIN	01/07/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	44	DRAIN	01/07/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	46	DRAIN	01/07/2019	01/22/2019	Visual	CLOGGED	VACUUM OUT
UU4	54	DRAIN	01/07/2019	01/22/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU4	56	DRAIN	01/07/2019	01/22/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	901369R	VENT	01/08/2019	01/10/2019	M21	BOTTOM FLANGE LEAKING	TIGHTEN FLANGE
UU3	901303R	VENT	01/08/2019	01/10/2019	M21	BOTTOM FLANGE LEAKING	TIGHTEN FLANGE
UU3	901546R	VENT	01/08/2019	01/10/2019	M21	BOTTOM FLANGE LEAKING	TIGHTEN FLANGE
ARU	901748RA	VENT	01/08/2019	01/08/2019	Visual	TRIPPED	RESET
ARU	1651	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1653	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1655	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1656	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1657	DRAIN	01/08/2019	01/08/2019	Visual	DEBRIS	CLEANED OUT
ARU	1660	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1664	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	63	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	64	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	65	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	66	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1666	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1668	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1671	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1675	DRAIN	01/08/2019	01/08/2019	Visual	DRY	ADD WATER
ARU	1676	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1678	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1680	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1681	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1687	DRAIN	01/08/2019	01/08/2019	Visual	DEBRIS	CLEANED OUT
ENVFAC	901464R	VENT	01/08/2019	01/10/2019	M21	INLET VENT LEAKING	RESEAT
ARU	1702	DRAIN	01/08/2019	01/08/2019	Visual	DEBRIS	CLEANED OUT
UU4	72A	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	79	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	81	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	82	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	87	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU4	88	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	89	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	90	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1699	DRAIN	01/08/2019	01/15/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU4	92	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	93	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	94	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	101	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1703	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1705	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1706	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1707	DRAIN	01/08/2019	01/08/2019	Visual	DEBRIS	CLEANED OUT
ARU	1708	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1712	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1714	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1716	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RE	VENT	01/08/2019	01/08/2019	Visual	TRIPPED	RESET
ENVFAC	901447RH	VENT	01/08/2019	01/08/2019	Visual	TRIPPED	RESET
ARU	1717	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1718	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1720	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1723	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1725	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1728	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1732	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1733	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1735	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1736	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ARU	1738	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1740	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1741	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1743	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1744	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1745	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1747	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1749	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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ARU	1750	DRAIN	01/08/2019	01/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PWR2	N692BDB	JCTBOX	01/09/2019	01/09/2019	Visual	HATCH	INSTALL SEALANT
ARU	1756B	DRAIN	01/09/2019	01/09/2019	Visual	DRY	ADD WATER
RHU	5376	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5378	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1757A	CLEAN-OUT	01/09/2019	01/09/2019	Visual	MISSING CAP	REPLACED CAP
RHU	5385	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5402	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5403	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5404	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5407	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5408	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5412	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5411	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5413	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5429	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	119	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	120	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1782	JCTBOX	01/09/2019	01/09/2019	Visual	NEEDS SEALANT	INSTALL SEALANT
UU4	152	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	188	DRAIN	01/09/2019	01/22/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU4	190	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1850	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1851	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1852	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1855	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1856	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1857	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1858	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1860	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1861	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1863	DRAIN	01/09/2019	01/09/2019	Visual	DRY	ADD WATER
ARU	1867	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1872	DRAIN	01/09/2019	01/09/2019	Visual	DRY	ADD WATER
ARU	1873	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1874	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER

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ARU	1875	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1876	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4258	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1878	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1881	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1882	DRAIN	01/09/2019	01/09/2019	Visual	DEBRIS	CLEANED OUT
RHU	4281	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1883	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4282	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4285	DRAIN	01/09/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4286	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1887	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4289	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4290	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4292	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1888	DRAIN	01/09/2019	01/09/2019	Visual	DRY	ADD WATER
RHU	4293	DRAIN	01/09/2019	01/21/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ARU	1889	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4294	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1891	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
RHU	4296	DRAIN	01/09/2019	01/09/2019	Visual	DRY	ADD WATER
ARU	1893	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1894	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1897	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1898	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1905	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1906	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1913	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	Rik901674RA	VENT	01/09/2019	01/09/2019	Visual	TRIPPED	RESET
ARU	1847	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ARU	1848	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1845	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1814	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1815	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
RHU	4308	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1816	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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ARU	1817	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1821	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4313	DRAIN	01/09/2019	01/09/2019	Visual	DRY	ADD WATER
ARU	1822	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4319	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1823	DRAIN	01/09/2019	01/09/2019	Visual	DRY	ADD WATER
ARU	1825	DRAIN	01/09/2019	01/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4331	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4333	DRAIN	01/10/2019	01/21/2019	Visual	FILLED W/DIRT/DEBRIS	INSTALL CAP
RHU	4335	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4337	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4341	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4342	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4344	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1813	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4552	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1824	DRAIN	01/10/2019	01/10/2019	Visual	DEBRIS	CLEANED OUT
ARU	1826	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1828	DRAIN	01/10/2019	01/10/2019	Visual	DEBRIS	CLEANED OUT
ARU	1829	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1830	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1831	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1832	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1833	DRAIN	01/10/2019	01/10/2019	Visual	DEBRIS	CLEANED OUT
ARU	1834	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1836	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1839	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1840	DRAIN	01/10/2019	01/10/2019	Visual	DEBRIS	CLEANED OUT
ARU	1841	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1842	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4104	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1843	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4111	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4118	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4129	DRAIN	01/10/2019	01/10/2019	Visual	DRY	ADD WATER
RHU	4131	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	4132	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4133	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4150	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4151	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4153	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4155	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4156	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4157	DRAIN	01/10/2019	01/10/2019	Visual	DRY	ADD WATER
RHU	4158	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1939	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4164	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4166	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4169	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4170	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4176	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4178	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4192	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4200	DRAIN	01/10/2019	01/24/2019	Visual	CLOGGED	CLEANED OUT
RHU	4203	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4205	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4207	DRAIN	01/10/2019	01/21/2019	Visual	CLOGGED	ADD WATER
RHU	4214	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4215	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4230	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	940	DRAIN	01/10/2019	01/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	948	DRAIN	01/10/2019	01/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6512	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6515	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	965	DRAIN	01/10/2019	01/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	966	DRAIN	01/10/2019	01/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	968	DRAIN	01/10/2019	01/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6524	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	336	JCTBOX	01/10/2019	01/10/2019	Visual	MISSING BOLTS	INSTALL SEALANT
UU3	279	JCTBOX	01/10/2019	01/17/2019	Visual/M21	GAP AT BOLTS	ADD SEALANT
UU3	279	JCTBOX	01/10/2019	01/10/2019	Visual/M21	GAP AT BOLTS	ADD SEALANT
UU3	294A	DRAIN	01/10/2019	01/15/2019	Visual	CLOGGED	ADD WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU3	580	CLEAN-OUT	01/10/2019	01/11/2019	Visual	FILLED with oil	CLEANED OUT
UU3	582	CLEAN-OUT	01/10/2019	01/11/2019	Visual	FILLED w/oil	CLEAN OUT
UU3	576	CLEAN-OUT	01/10/2019	01/11/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT
UU3	578	CLEAN-OUT	01/10/2019	01/11/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT
UU3	603	CLEAN-OUT	01/10/2019	01/11/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT
UU3	602	CLEAN-OUT	01/10/2019	01/11/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT
UU3	611	CLEAN-OUT	01/10/2019	01/11/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT
UU3	612	JCTBOX	01/10/2019	01/10/2019	Visual	MISSING BOLTS	INSTALL SEALANT
UU3	620	JCTBOX	01/10/2019	01/10/2019	M21	MISSING BOLTS	INSTALL SEALANT
RHU	6552	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6553	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6554	DRAIN	01/10/2019	01/10/2019	Visual	DRY	ADD WATER
RHU	6556	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6557	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6560	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6562	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6564	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6565	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6571	DRAIN	01/10/2019	01/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6574	DRAIN	01/10/2019	01/24/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	N57DCB	DRAIN	01/11/2019	01/15/2019	Visual	NO WATER SEAL/ESSCO REMOVED	INSTALLED INSERT
RHU	6598	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER
RHU	6614	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER
RHU	6617	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6619	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6622A	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6632	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER
RHU	6640	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER
RHU	3754	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER
RHU	3755	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER
RHU	3757	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3763	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER
RHU	3765	DRAIN	01/11/2019	01/25/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
RHU	3766	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER
RHU	3767	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	3768	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER
RHU	3778	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3781	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER
RHU	3785	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3788	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3790	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER
RHU	3794	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER
RHU	3795	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER
RHU	3798	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER
RHU	3799	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3802	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3804	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3806	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3810	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3811	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3812	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3813	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3816	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3817	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3820	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3822	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3830	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3832	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3837	DRAIN	01/11/2019	01/25/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
RHU	3838	DRAIN	01/11/2019	01/15/2019	Visual	CLOGGED	ADD WATER
RHU	3841	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3842	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3844	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3861	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER
RHU	3875	DRAIN	01/11/2019	01/21/2019	Visual	CLOGGED	ADD WATER
RHU	3881	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3883	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3888	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3889	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3890	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3892	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	3894	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER
RHU	3899	DRAIN	01/11/2019	01/25/2019	Visual	CLOGGED	INSTALL CAP
RHU	3895	DRAIN	01/11/2019	01/25/2019	Visual	CLOGGED	CLEANED OUT
RHU	3897	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3905	DRAIN	01/11/2019	01/25/2019	Visual	CLOGGED	CLEANED OUT
RHU	3909	DRAIN	01/11/2019	01/21/2019	Visual	CLOGGED	INSTALL CAP
RHU	3912	DRAIN	01/11/2019	01/21/2019	Visual	CLOGGED	INSTALL CAP
RHU	3915	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER
RHU	3926	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3927	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3930	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3931	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3932	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3933	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3936	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3937	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3939	DRAIN	01/11/2019	01/11/2019	Visual	DRY	ADD WATER
RHU	3941	DRAIN	01/11/2019	01/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5075	DRAIN	01/14/2019	01/15/2019	Visual	DEBRIS	CLEANED OUT
ENVFAC	901447RH	VENT	01/14/2019	01/14/2019	Visual	TRIPPED	RESET
ENVFAC	7014AJ.05	CONECT	01/14/2019	01/18/2019	M21	REDUCER LEAKING	TIGHTEN CONNECTOR
DDU	990	DRAIN	01/14/2019	01/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1003	DRAIN	01/14/2019	01/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1004	DRAIN	01/14/2019	01/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1032	DRAIN	01/14/2019	01/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1033	DRAIN	01/14/2019	01/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1035	DRAIN	01/14/2019	01/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	901690RA	VENT	01/14/2019	01/21/2019	Visual	TRIPPED	RESET
ARU	901748RA	VENT	01/15/2019	01/15/2019	Visual	TRIPPED	RESET
ENVFAC	901447RG	VENT	01/15/2019	01/15/2019	Visual	TRIPPED	RESET
NDU	674	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	675	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	694	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	8055	JCTBOX	01/15/2019	01/15/2019	Visual	GAP AT BOLTS	ADD SEALANT
RHU	3951	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3952	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	3961	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3964	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3965	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3967	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3969	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3972	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3973	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3980	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3982	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3983	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3989	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3991	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3994	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4002	DRAIN	01/15/2019	01/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	256	JCTBOX	01/16/2019	01/16/2019	Visual	MISSING BOLTS	INSTALL SEALANT
UU3	266	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	273	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	278	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
RHU	6529	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	284	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	288	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	289	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3833	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	291	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	292	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	297	DRAIN	01/16/2019	01/31/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	300	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	301	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	303	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	304	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	307	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	308	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	309	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4757	OWSEP	01/16/2019	01/17/2019	Visual/M21	HATCH	REPLACE GASKET/ADD SEALANT
UU3	312	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	322	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU3	323	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	325	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	326	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	338	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	339	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	340	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4760	JCTBOX	01/16/2019	01/17/2019	Visual/M21	HATCH	REPLACE GASKET/ADD SEALANT
UU3	341	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	342	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	344	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	346	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	347	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	350	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	351	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	354	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	355	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	357	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	360	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	375	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	387	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	404	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	410	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	413	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	418	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	420	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	422	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	423	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	434	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	440	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	444	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	445	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	447	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	451	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	452	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	453	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	454	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU3	457	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	474	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	487	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	499	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	513	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	515	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	522	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	532	DRAIN	01/16/2019	01/31/2019	Visual	CLOGGED	CLEANED OUT
UU3	534	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	N137CCB	DRAIN	01/16/2019	01/16/2019	Visual	DEBRIS	CLEANED OUT
UU3	571	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	574	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	600	DRAIN	01/16/2019	01/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	N24BCB	DRAIN	01/17/2019	01/21/2019	Visual	CLOGGED	CLEANED OUT
RHU	4568	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	412	JCTBOX	01/17/2019	01/17/2019	Visual	MISSING BOLTS	INSTALL SEALANT
RHU	4569	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	432	JCTBOX	01/17/2019	01/17/2019	Visual	MISSING BOLTS	INSTALL SEALANT
UU3	496	JCTBOX	01/17/2019	01/17/2019	Visual	MISSING BOLTS	INSTALL SEALANT
UU3	497	JCTBOX	01/17/2019	01/17/2019	Visual	MISSING BOLTS	INSTALL SEALANT
UU3	498	JCTBOX	01/17/2019	01/17/2019	Visual	MISSING BOLTS	INSTALL SEALANT
RHU	4604	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4605	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4610	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4611	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4617	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4618	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4619	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4621	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4633	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4634	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4639	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4643	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4645	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4649	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4651	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	4653	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4654	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4658	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4661	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4673	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4677	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4692	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	707	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	712	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	713	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	728	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	731	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	732	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	733	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	735	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	736	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	753	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	754	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	755	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4700	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4701	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4704	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4710	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4717	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4717A	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4720	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4732	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4734	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4736	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4744	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4749	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4779	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4780	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2126	DRAIN	01/17/2019	01/18/2019	Visual	DRY	ADD WATER
RHU	4785	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4786	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	4790	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4792	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2132	DRAIN	01/17/2019	01/18/2019	Visual	DRY	ADD WATER
RHU	4794	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2133	DRAIN	01/17/2019	01/18/2019	Visual	DRY	ADD WATER
FCCU1	2136	DRAIN	01/17/2019	01/18/2019	Visual	DRY	ADD WATER
FCCU1	2142	DRAIN	01/17/2019	01/18/2019	Visual	DRY	ADD WATER
FCCU1	2143	DRAIN	01/17/2019	01/18/2019	Visual	DRY	ADD WATER
RHU	4580	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2152	DRAIN	01/17/2019	01/18/2019	Visual	DRY	ADD WATER
FCCU1	2155	DRAIN	01/17/2019	01/18/2019	Visual	DRY	ADD WATER
RHU	5182	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5183	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5188	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5200	DRAIN	01/17/2019	01/25/2019	Visual	CLOGGED	CLEANED OUT
RHU	5199	CLEAN-OUT	01/17/2019	01/21/2019	Visual	MISSING CAP	INSTALL CLEAN OUT CAP
RHU	4587	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4588	DRAIN	01/17/2019	01/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4592	DRAIN	01/18/2019	01/18/2019	Visual	DRY	ADD WATER
RHU	4594	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4599	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4600	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5266	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5267	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5268	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5269	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5270	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5274	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5276	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3103	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5279	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5283	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3104	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5284	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5285	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5286	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	5287	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5292	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5293	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5298	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5302	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5305	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5313	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5315	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3120	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5316	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5317	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5318	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3121	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3122	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5330	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5332	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3126	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6002	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6004	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6005	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3127	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3128	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6007	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6010	DRAIN	01/18/2019	01/18/2019	Visual	DRY	ADD WATER
RHU	6013	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6014	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6015	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6016	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6017	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3131	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6020	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6022	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6023	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6024	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6025	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6033	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	6041	DRAIN	01/18/2019	01/18/2019	Visual	DRY	ADD WATER
RHU	6042	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3134	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6043	DRAIN	01/18/2019	01/18/2019	Visual	DRY	ADD WATER
RHU	6045	DRAIN	01/18/2019	01/18/2019	Visual	DRY	ADD WATER
RHU	6046	DRAIN	01/18/2019	01/25/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3135	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3137	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3138	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3141	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3142	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4451	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4452	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4455	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4460	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4461	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4466	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4467	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4471	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4475	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4476	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4485	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4501	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4502	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6057	DRAIN	01/18/2019	01/18/2019	Visual	DRY	ADD WATER
RDU	4503	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4504	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6064	DRAIN	01/18/2019	01/18/2019	Visual	DRY	ADD WATER
RHU	6071	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6072	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6075	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6083	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6084	DRAIN	01/18/2019	01/18/2019	Visual	DRY	ADD WATER
PS3A	3171	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5282	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3175	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3A	3176	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3177	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3178	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2090	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2091	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2416	DRAIN	01/18/2019	01/18/2019	Visual	DRY	ADD WATER
FCCU3	2417	DRAIN	01/18/2019	01/18/2019	Visual	DRY	ADD WATER
PS3A	3181	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2440	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2442	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2455	DRAIN	01/18/2019	01/18/2019	Visual	DEBRIS	CLEANED OUT
FCCU3	2466	DRAIN	01/18/2019	01/18/2019	Visual	DRY	ADD WATER
FCCU3	2471	DRAIN	01/18/2019	01/18/2019	Visual	DEBRIS	CLEANED OUT
FCCU3	2476	DRAIN	01/18/2019	01/18/2019	Visual	DRY	ADD WATER
PS3A	3269	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3270	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3271	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2571	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2572	DRAIN	01/18/2019	01/18/2019	Visual	DRY	ADD WATER
PS3A	3272	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2573	DRAIN	01/18/2019	01/18/2019	Visual	DRY	ADD WATER
PS3A	3273	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2581	DRAIN	01/18/2019	01/18/2019	Visual	DRY	ADD WATER
PS3A	3274	DRAIN	01/18/2019	01/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2582	DRAIN	01/18/2019	01/18/2019	Visual	DRY	ADD WATER
FCCU3	2593	DRAIN	01/21/2019	01/21/2019	Visual	DRY	ADD WATER
FCCU3	2605	DRAIN	01/21/2019	01/21/2019	Visual	DRY	ADD WATER
FCCU3	2614	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2615	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2639	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2645	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2646A	DRAIN	01/21/2019	01/21/2019	Visual	DRY	ADD WATER
FCCU3	2672	DRAIN	01/21/2019	01/21/2019	Visual	DRY	ADD WATER
FCCU3	2679	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2681	DRAIN	01/21/2019	01/21/2019	Visual	DRY	ADD WATER
FCCU3	2682	DRAIN	01/21/2019	01/21/2019	Visual	DRY	ADD WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
FCCU3	2684	DRAIN	01/21/2019	01/21/2019	Visual	DRY	ADD WATER
FCCU3	2733	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2736	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2738	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2739	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2740	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2741	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2742	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3101	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2744	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2745	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3197	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3198	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3214	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3215	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3216	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3217	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3251	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3261	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3262	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3263	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3276	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3278	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3280	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3282	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3285	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3292	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3299	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3309	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3310	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3313	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3319A	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3319B	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3320	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3321	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3287	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3A	3288	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3289	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3349	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3349A	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3351	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3353	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3356	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3362	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3363	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3364	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3365	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3367	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3371A	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3389	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3390	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3434	DRAIN	01/21/2019	01/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3459	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3461	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3474	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3476	CLEAN-OUT	01/22/2019	01/23/2019	Visual	MISSING CAP	ADD CAP
CFHU	3477	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3478	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3479	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3481	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3485	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3489	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3490	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3492	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3494	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3496	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2751	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2760	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2762	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2799	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2800	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2802	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2804	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2823	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RH	VENT	01/22/2019	01/22/2019	Visual	TRIPPED	RESET
PS3B	2828	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2831	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2832	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2833	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2838	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2841	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2842	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2843	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2845	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2846	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2847	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2849	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2850	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2851	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2852	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2853	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2854	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2857	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2858	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2859	DRAIN	01/22/2019	01/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2752	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2753	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2754	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2755A	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2759	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2829	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2861	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2862	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2863	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2866	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2868	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2869	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2871	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2887	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2888	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2891	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2892	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2894	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2895	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2896	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2896A	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2899	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2922	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2923	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2924	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2925	DRAIN	01/23/2019	01/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	901490RB	VENT	01/24/2019	01/24/2019	Visual	TRIPPED	RESET
CFHU	3502	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3503	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3504	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3522	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3524	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3574	DRAIN	01/24/2019	01/24/2019	Visual	DRY	ADD WATER
CFHU	3582	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3599	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3629	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3635	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	901748RA	VENT	01/24/2019	01/24/2019	Visual	TRIPPED	RESET
CFHU	3655	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3664	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3665	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3666	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3669	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3671	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3689	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3692	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3694	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3698	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3699	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
CFHU	3701	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3702	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3703	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3705	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3708	DRAIN	01/24/2019	01/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2926	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2927	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2928	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2929	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2935	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2936	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2937	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2939	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2940	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2942	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2943	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2944	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2945	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2952	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2979	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2980	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2981	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2984	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2985	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2992	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2994	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3019	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3020	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3021	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3022	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025A	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025B	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025E	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3044	DRAIN	01/25/2019	01/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4358	DRAIN	01/28/2019	01/28/2019	Visual	DRY	ADD WATER
COKERS	4362	DRAIN	01/28/2019	01/28/2019	Visual	DRY	ADD WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
COKERS	4364	DRAIN	01/28/2019	01/28/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
COKERS	4376	DRAIN	01/28/2019	02/07/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
COKERS	4381	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4385	DRAIN	01/28/2019	01/28/2019	Visual	DRY	ADD WATER
COKERS	4386	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4389	DRAIN	01/28/2019	01/28/2019	Visual	DRY	ADD WATER
COKERS	4401	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4402	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4403	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4416B	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4417	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4418	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4419	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4421	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4424	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4425	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4427	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4431	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
HRU	5250	DRAIN	01/28/2019	01/28/2019	Visual	DRY	ADD WATER
HRU	5253	DRAIN	01/28/2019	01/28/2019	Visual	DRY	ADD WATER
HRU	5254A	DRAIN	01/28/2019	01/28/2019	Visual	DRY	ADD WATER
HRU	5255	DRAIN	01/28/2019	01/28/2019	Visual	DRY	ADD WATER
HRU	5256	DRAIN	01/28/2019	01/28/2019	Visual	DRY	ADD WATER
HRU	5257	DRAIN	01/28/2019	01/28/2019	Visual	DRY	ADD WATER
HRU	5258A	CLEAN-OUT	01/28/2019	01/28/2019	Visual	FILLED W/DIRT/DEBRIS	CLEAR DEBRIS
COKERS	4804	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4805	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4805A	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4806	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4807	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4809	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4818	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4820	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4849	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4850	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4909	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
COKERS	4910	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4911	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4912	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4926	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4927	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4928	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4929	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4931	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4932	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	756	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	757	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	758	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	771	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	776	DRAIN	01/28/2019	01/28/2019	Visual	DRY	ADD WATER
AU2	777	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	778	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	779	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	782	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	785	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	786	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	787	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	795	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
AU2	826	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	827	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	854	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1084	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1092	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1094	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1103	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1107	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1113	DRAIN	01/28/2019	01/28/2019	Visual	DRY	ADD WATER
DDU	1118	DRAIN	01/28/2019	01/28/2019	Visual	DRY	ADD WATER
DDU	1121	DRAIN	01/28/2019	01/28/2019	Visual	DRY	ADD WATER
DDU	1128	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1100	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	999	DRAIN	01/28/2019	01/28/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	901748R	VENT	01/29/2019	01/29/2019	Visual	TRIPPED	RESET
ULC	901490RB	VENT	01/29/2019	01/29/2019	Visual	TRIPPED	RESET
ENVFAC	901449R	VENT	01/29/2019	02/13/2019	Visual	INDICATOR BROKEN	REPLACED INDICATOR
ENVFAC	901447RH	VENT	01/29/2019	01/29/2019	Visual	TRIPPED	RESET
RHU	3757	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3766	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3767	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3768	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3785	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3788	DRAIN	02/04/2019	02/04/2019	Visual	DRY	ADD WATER
RHU	3790	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3794	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3798	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3799	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3802	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3810	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3811	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3812	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3815	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3816	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3817	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3820	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3821	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3830	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3832	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3833	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3838	DRAIN	02/04/2019	02/04/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
RHU	3841	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3842	DRAIN	02/04/2019	02/04/2019	Visual	DRY	ADD WATER
RHU	3875	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3881	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3883	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3888	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3889	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3890	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3892	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	3894	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3897	DRAIN	02/04/2019	02/04/2019	Visual	DRY	ADD WATER
RHU	3899	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3901	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3903	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	901700R	VENT	02/04/2019	02/05/2019	Visual	TRIPPED	RESET
RHU	3912	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3927	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3931	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3932	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3933	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3936	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3939	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3941	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	901667RB	VENT	02/04/2019	02/05/2019	Visual	TRIPPED	RESET
RHU	3965	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3967	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3969	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3973	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3978	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3979	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3982	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3983	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3989	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3991	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3994	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3995	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4002	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4006	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4007	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3980	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4104	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4107	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4111	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4118	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4119	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	4121	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4128	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4131	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4138	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4140	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4149	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4150	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4151	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4155	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4156	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4203	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4211	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4213	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4214	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4215	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4222	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	901748RA	VENT	02/04/2019	02/04/2019	Visual	TRIPPED	RESET
RHU	4230	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4241	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4245	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4249	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	901490RB	VENT	02/04/2019	02/04/2019	Visual	TRIPPED	RESET
RHU	4251	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4253	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4260	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4266	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4268	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4272	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4275	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4279	DRAIN	02/04/2019	02/04/2019	Visual	DRY	ADD WATER
RHU	4281	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4289	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	8090	SEWERLINE	02/04/2019	4/23/2019	Visual	PUMP SEAL	DOR REPLACED BEARINGS AND SEAL
RHU	4341	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4342	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4344	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ENVFAC	901450R	VENT	02/04/2019	02/05/2019	Visual	INDICATOR BROKEN	REPLACED INDICATOR
RHU	4552	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4554	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RH	VENT	02/04/2019	02/05/2019	Visual	TRIPPED	RESET
RHU	4580	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4582	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4587	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4588	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4600	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4608	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4613	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4615	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4618	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4639	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4641	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4651	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4653	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4670	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4673	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4674	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4679	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4692	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4700	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4706	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4710	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4711	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4714	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4720	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4723	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4727	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4732	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4736	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4744	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4749	DRAIN	02/04/2019	02/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6002	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6004	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	6005	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6006	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6007	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6008	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6010	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6013	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6016	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6017	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6020	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6022	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6023	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6024	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6025	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6026	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6032	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6033	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6064	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6066	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6071	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6072	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4780	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4779	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4790	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4792	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4785	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4786	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5200	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4797	DRAIN	02/05/2019	02/05/2019	Visual	DRY	ADD WATER
RHU	5177	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6524	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6518	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6520	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6535	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6552	DRAIN	02/05/2019	02/05/2019	Visual	DRY	ADD WATER
RHU	6553	DRAIN	02/05/2019	02/05/2019	Visual	DRY	ADD WATER
RHU	6556	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	6557	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6560	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6562	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6564	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6565	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6612	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6619	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	27	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	28	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6622A	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	32	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	33	DRAIN	02/05/2019	02/05/2019	Visual	DRY	ADD WATER
RHU	6626	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	34	DRAIN	02/05/2019	02/05/2019	Visual	DRY	ADD WATER
RHU	6635	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	36	DRAIN	02/05/2019	02/05/2019	Visual	DEBRIS	CLEAN OUT AND ADD WATER
UU4	37	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	38	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	39	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	40	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	43	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	44	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	56	DRAIN	02/05/2019	02/20/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
UU4	58	DRAIN	02/05/2019	02/20/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
UU4	63	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	64	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	65	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	72A	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5183	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5182	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5427	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5267	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5268	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5269	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5270	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5274	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	5276	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5279	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5285	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5283	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5286	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5287	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5292	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5293	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5313	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	81	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5308	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5306	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	82	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5302	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5318	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5317	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5316	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	89	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	90	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5315	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5330	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5402	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5404	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5407	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5408	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5413	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5414	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5351	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5364	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901480R	VENT	02/05/2019	02/06/2019	Visual	TRIPPED	RESET
RHU	5432	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5368	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5367	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
HRU	5218	DRAIN	02/05/2019	02/05/2019	Visual	DRY	ADD WATER
HRU	5219	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
HRU	5225	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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HRU	5254A	DRAIN	02/05/2019	02/05/2019	Visual	DRY	ADD WATER
UU4	92	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	93	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3461	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3467	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3474	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	99	JCTBOX	02/05/2019	02/05/2019	M21	GASKET	INSTALL SEALANT
CFHU	3479	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3489	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3490	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3496	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3498	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3500	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3502	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3516	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3518	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3519	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3522	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3550	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3478	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3481	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3570	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3571	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3574	DRAIN	02/05/2019	02/05/2019	Visual	DRY	ADD WATER
CFHU	3577	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3580	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3582	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3599	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3615	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	104	DRAIN	02/05/2019	02/20/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
CFHU	3629	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3635	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3643	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	119	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	120	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3662	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
CFHU	3664	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3666	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3669	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3671	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	121	DRAIN	02/05/2019	02/20/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
CFHU	3688A	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3692	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3694	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3698	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3699	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3701	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3703	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3705	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3708	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3710	DRAIN	02/05/2019	02/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3103	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3104	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3121	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3122	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3129	DRAIN	02/06/2019	02/06/2019	Visual	DRY	ADD WATER
PS3A	3132	DRAIN	02/06/2019	02/11/2019	Visual	CLOGGED	ADD WATER
UU4	134	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	138	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3136	DRAIN	02/06/2019	02/06/2019	Visual	DEBRIS	CLEANED OUT
UU4	142	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3147	DRAIN	02/06/2019	02/06/2019	Visual	DEBRIS	CLEANED OUT
PS3A	3161	DRAIN	02/06/2019	02/11/2019	Visual	CLOGGED	has a CAP on it
PS3A	3167	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3180	DRAIN	02/06/2019	02/11/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3181A	DRAIN	02/06/2019	02/11/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3182	DRAIN	02/06/2019	02/11/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3184	DRAIN	02/06/2019	02/11/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3185	DRAIN	02/06/2019	02/06/2019	Visual	DRY	ADD WATER
PS3A	3191A	DRAIN	02/06/2019	02/11/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3191B	DRAIN	02/06/2019	02/11/2019	Visual	CLOGGED	CLEANED OUT
FCCU3	2091	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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FCCU3	2090	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2416	DRAIN	02/06/2019	02/06/2019	Visual	DRY	ADD WATER
FCCU3	2417	DRAIN	02/06/2019	02/06/2019	Visual	DRY	ADD WATER
FCCU3	2435	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	152	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2442	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1000	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2459	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2461	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2473	DRAIN	02/06/2019	02/06/2019	Visual	DRY	ADD WATER
DDU	1008	DRAIN	02/06/2019	02/20/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
FCCU3	2516	DRAIN	02/06/2019	02/06/2019	Visual	DRY	ADD WATER
FCCU3	2517	DRAIN	02/06/2019	02/06/2019	Visual	DRY	ADD WATER
FCCU3	2529	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2532	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1024	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2565	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1032	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1033	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2573	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1034	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1037	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1038	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2582	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2593	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2595	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2601	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2602	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1064	DRAIN	02/06/2019	02/06/2019	Visual	DRY	ADD WATER
FCCU3	2604	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2621	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2624	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2630	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2631	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2634	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2635	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
FCCU3	2636	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2637	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2639	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2641	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2642	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2648	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2652	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2654	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2665	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3219	DRAIN	02/06/2019	02/06/2019	Visual	DEBRIS	CLEANED OUT
FCCU3	2670	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2674	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2679	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3225	DRAIN	02/06/2019	02/06/2019	Visual	DEBRIS	CLEANED OUT
FCCU3	2680	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2682	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3227	DRAIN	02/06/2019	02/06/2019	Visual	DRY	ADD WATER
FCCU3	2684	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070G	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070I	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070K	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070L	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1071	DRAIN	02/06/2019	02/06/2019	Visual	DRY	ADD WATER
PS3A	3271	DRAIN	02/06/2019	02/20/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3269	DRAIN	02/06/2019	02/20/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
FCCU3	2720	DRAIN	02/06/2019	02/20/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3279	DRAIN	02/06/2019	02/20/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3281	DRAIN	02/06/2019	02/20/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3286	DRAIN	02/06/2019	02/11/2019	Visual	CLOGGED	has a CAP on it
FCCU3	2733	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2736	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3291	DRAIN	02/06/2019	02/06/2019	Visual	DRY	ADD WATER
FCCU3	2738	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2739	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3294	DRAIN	02/06/2019	02/11/2019	Visual	CLOGGED	Has a CAP on it
PS3A	3294A	DRAIN	02/06/2019	02/20/2019	Visual	CLOGGED	CLEANED OUT

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
FCCU3	2740	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3295	DRAIN	02/06/2019	02/20/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3321A	DRAIN	02/06/2019	02/11/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3322	DRAIN	02/06/2019	02/20/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3324	DRAIN	02/06/2019	02/11/2019	Visual	DEBRIS	CLEANED OUT
DDU	1102	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3349A	DRAIN	02/06/2019	02/20/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3352	DRAIN	02/06/2019	02/20/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3360A	DRAIN	02/06/2019	02/20/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3372	DRAIN	02/06/2019	02/11/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3386	DRAIN	02/06/2019	02/06/2019	Visual	DEBRIS	CLEANED OUT
FCCU3	2741	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3401	CLEAN-OUT	02/06/2019	02/11/2019	Visual	MISSING CAP	install cap
FCCU3	2742	DRAIN	02/06/2019	02/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3403	DRAIN	02/06/2019	02/11/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3411	DRAIN	02/06/2019	02/11/2019	Visual	CLOGGED	ADD WATER
PS3A	3415	DRAIN	02/06/2019	02/06/2019	Visual	DEBRIS	CLEANED OUT
PS3A	3416	DRAIN	02/06/2019	02/11/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3433	DRAIN	02/06/2019	02/20/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3433A	DRAIN	02/06/2019	02/20/2019	Visual	CLOGGED	CLEANED OUT
PS3A	7090	DRAIN	02/06/2019	02/20/2019	Visual	CLOGGED	CLEANED OUT
PS3B	2753	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2754	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2755	DRAIN	02/07/2019	02/07/2019	Visual	DRY	ADD WATER
PS3B	2755A	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2756	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2759	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2760	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2764	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2767	DRAIN	02/07/2019	02/07/2019	Visual	CLOGGED	ADD WATER
PS3B	2774	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2788	DRAIN	02/07/2019	02/07/2019	Visual	DRY	ADD WATER
PS3B	2789	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2793	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2799	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2803	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2804	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2828	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2829	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2831	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2832	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2833	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2834	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2837	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2838	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2842	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2843	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2845	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2846	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2847	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2849	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2851	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2854	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2857	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2862	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2863	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2869	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2871	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2888	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2891	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2892	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2895	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2922	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2923	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2924	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2929	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2935	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2936	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2939	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2942	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2943	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2944	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2946	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2965	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2979	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2980	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2981	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2984	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2985	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2990	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2992	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3012	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3019	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3020	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3021	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3022	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4351	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4352	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4365	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4367	DRAIN	02/07/2019	02/07/2019	Visual	DRY	ADD WATER
COKERS	4389	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4394	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4409A	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4417	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4418	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4419	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4421	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4875	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4865A	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4832A	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4829	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4820	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4819	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4818	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4809	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4807	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4806	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4805	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
COKERS	4804	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4852	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4849	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4825	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4824	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4922	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4921	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4918	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4919	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4908A	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4910	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4911	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4912	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4926	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4927	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4805A	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4928	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4929	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4931	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4932	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4936	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4940	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4909	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	6925D	DRAIN	02/07/2019	02/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	7020	TANK	02/11/2019	02/13/2019	Visual	AVO/ VISUAL FAIL/ HATCH	TIGHTEN BOLTS
RDU	4501	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4502	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4503	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4504	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4451	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4452	DRAIN	02/11/2019	02/11/2019	Visual	DRY	ADD WATER
RDU	4455	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4456	DRAIN	02/11/2019	02/11/2019	Visual	DRY	ADD WATER
RDU	4460	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4461	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4462	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RDU	4464	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4471	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4473	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4474	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4476	DRAIN	02/11/2019	02/11/2019	Visual	DRY	ADD WATER
RDU	4480	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4485	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4475	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4490	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2106	DRAIN	02/11/2019	02/11/2019	Visual	DRY	ADD WATER
FCCU1	2129	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2130	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2133	DRAIN	02/11/2019	02/11/2019	Visual	DRY	ADD WATER
PS3B	901667RB	VENT	02/11/2019	02/11/2019	Visual	TRIPPED	RESET
FCCU1	2136	DRAIN	02/11/2019	02/11/2019	Visual	DRY	ADD WATER
FCCU1	2142	DRAIN	02/11/2019	02/11/2019	Visual	DRY	ADD WATER
FCCU1	2143	DRAIN	02/11/2019	02/11/2019	Visual	DRY	ADD WATER
FCCU1	2149	DRAIN	02/11/2019	02/11/2019	Visual	DRY	ADD WATER
FCCU1	2150	DRAIN	02/11/2019	02/11/2019	Visual	DRY	ADD WATER
FCCU1	2162	DRAIN	02/11/2019	02/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2213A	DRAIN	02/11/2019	02/11/2019	Visual	DRY	ADD WATER
ARU	901748RA	VENT	02/11/2019	02/11/2019	Visual	TRIPPED	RESET
ULC	901490RB	VENT	02/11/2019	02/11/2019	Visual	TRIPPED	RESET
ENVFAC	901447RH	VENT	02/11/2019	02/11/2019	Visual	TRIPPED	RESET
ARU	1669	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1675	DRAIN	02/12/2019	02/12/2019	Visual	DRY	ADD WATER
ARU	1699	DRAIN	02/12/2019	02/27/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
ARU	1716	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1717	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1725	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1757A	CLEAN-OUT	02/12/2019	02/14/2019	Visual	MISSING CAP	MISSING CAP REPLACED
ARU	1758	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1791	DRAIN	02/12/2019	02/12/2019	Visual	DRY	ADD WATER
ARU	1803	DRAIN	02/12/2019	02/12/2019	Visual	DRY	ADD WATER
ARU	1805	DRAIN	02/12/2019	02/27/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
ARU	1821	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1829	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1845	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1851	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1852	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1855	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1856	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1858	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1863	DRAIN	02/12/2019	02/12/2019	Visual	DRY	ADD WATER
ARU	1864	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1878	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1881	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1883	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1887	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1889	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1153	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1901	DRAIN	02/12/2019	02/12/2019	Visual	DRY	ADD WATER
ULC	1155	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1162	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1164	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1168	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1169	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1170	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1171	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1177	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1178	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1187	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	188	DRAIN	02/12/2019	02/27/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
UU4	192	DRAIN	02/12/2019	02/27/2019	Visual	CLOGGED	CLEANED OUT
ULC	1191	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	194	DRAIN	02/12/2019	02/27/2019	Visual	CLOGGED	CLEANED OUT
ULC	1192	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	195	CLEAN-OUT	02/12/2019	02/14/2019	Visual	MISSING CAP	INSTALL CAP
UU4	196	DRAIN	02/12/2019	02/27/2019	Visual	CLOGGED	CLEANED OUT
ULC	1194	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1196	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	206	DRAIN	02/12/2019	02/12/2019	Visual	CLOGGED	ADD WATER

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ULC	1202	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1203	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1207	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1212	DRAIN	02/12/2019	02/12/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
ULC	1230	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1233	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	919	DRAIN	02/12/2019	02/12/2019	Visual/M21	DRAIN LEAKING	FLUSHED WITH WATER
DDU	919	DRAIN	02/12/2019	02/12/2019	Visual/M21	DRAIN LEAKING	FLUSHED WITH WATER
ULC	1241	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1242	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1243	DRAIN	02/12/2019	02/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1250	DRAIN	02/12/2019	02/27/2019	Visual	CLOGGED	CLEANED OUT
DDU	940	DRAIN	02/12/2019	02/27/2019	Visual/M21	DRAIN LEAKING	FLUSHED WITH WATER
DDU	940	DRAIN	02/12/2019	02/27/2019	Visual/M21	DRAIN LEAKING	FLUSHED WITH WATER
ULC	1292	DRAIN	02/14/2019	02/14/2019	Visual	DRY	ADD WATER
ULC	1294	DRAIN	02/14/2019	02/14/2019	Visual	DRY	ADD WATER
ULC	1296	DRAIN	02/14/2019	02/27/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
ULC	1297	DRAIN	02/14/2019	02/14/2019	Visual	DRY	ADD WATER
ULC	1298	DRAIN	02/14/2019	02/14/2019	Visual	DRY	ADD WATER
ULC	1299	DRAIN	02/14/2019	02/14/2019	Visual	DRY	ADD WATER
ULC	1300	DRAIN	02/14/2019	02/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1301	DRAIN	02/14/2019	02/14/2019	Visual	DRY	ADD WATER
ULC	1303	DRAIN	02/14/2019	02/14/2019	Visual	DRY	ADD WATER
ULC	1304	DRAIN	02/14/2019	02/14/2019	Visual	DRY	ADD WATER
ULC	1305	DRAIN	02/14/2019	02/14/2019	Visual	DRY	ADD WATER
ULC	1307	DRAIN	02/14/2019	02/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1312	DRAIN	02/14/2019	02/14/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
ULC	1315	DRAIN	02/14/2019	02/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1318	DRAIN	02/14/2019	02/14/2019	Visual	CLOGGED	ADD WATER
ULC	1319	DRAIN	02/14/2019	02/14/2019	Visual	DRY	ADD WATER
ULC	1333	DRAIN	02/14/2019	02/14/2019	Visual	DRY	ADD WATER
ULC	1341	DRAIN	02/14/2019	02/14/2019	Visual	CLOGGED	ADD WATER
ULC	1344	DRAIN	02/14/2019	02/14/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ULC	1350	DRAIN	02/14/2019	02/14/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ULC	1351	DRAIN	02/14/2019	02/14/2019	Visual	DRY	ADD WATER
ULC	1352	DRAIN	02/14/2019	02/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ULC	1357	DRAIN	02/14/2019	02/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1358	DRAIN	02/14/2019	02/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1359A	DRAIN	02/14/2019	02/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1332	DRAIN	02/14/2019	02/19/2019	Visual	CLOGGED	CLEANED OUT
DDU	959	DRAIN	02/14/2019	02/14/2019	M21	DRAIN LEAKING	FLUSHED WITH WATER
DDU	961	DRAIN	02/14/2019	02/14/2019	Visual	DRY	ADD WATER
DDU	986	DRAIN	02/14/2019	02/14/2019	Visual	DRY	ADD WATER
ULC	1401	DRAIN	02/14/2019	02/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1403	DRAIN	02/14/2019	02/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1442	DRAIN	02/14/2019	02/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1443	DRAIN	02/14/2019	02/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1455	DRAIN	02/14/2019	02/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	651	DRAIN	02/15/2019	02/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	652	DRAIN	02/15/2019	02/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	663	DRAIN	02/15/2019	02/15/2019	Visual	DRY	ADD WATER
NDU	687	DRAIN	02/15/2019	02/15/2019	Visual	DRY	ADD WATER
ULC	1456	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1460	DRAIN	02/18/2019	02/18/2019	Visual	DRY	ADD WATER
ULC	1463	DRAIN	02/18/2019	02/18/2019	Visual	DRY	ADD WATER
ULC	1465	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1466	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1467	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	250	DRAIN	02/18/2019	02/21/2019	Visual	DRY	ADD WATER
ULC	1472	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1473	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1474	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1475	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	260	DRAIN	02/18/2019	02/18/2019	Visual/M21	DRAIN LEAKING	FLUSHED WITH WATER
UU3	260	DRAIN	02/18/2019	02/18/2019	Visual/M21	DRAIN LEAKING	FLUSHED WITH WATER
ULC	1476A	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1476B	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1477	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1478	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1481	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1485	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1487	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
AU2	4524B	DRAIN	02/18/2019	03/04/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ULC	1495	DRAIN	02/18/2019	02/18/2019	Visual	DRY	ADD WATER
ULC	1497	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	269	DRAIN	02/18/2019	02/20/2019	Visual/M21	DRAIN LEAKING	FLUSHED WITH WATER
ULC	1499	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1500	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1501	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1502	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1506	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1510	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	712	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1512	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1516	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1517	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	269	DRAIN	02/18/2019	02/20/2019	Visual/M21	DRAIN LEAKING	FLUSHED WITH WATER
ULC	1526	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1527	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	719	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1532	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	272	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1533	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1534	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	735	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	736	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1542C	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	738	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	739A	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1582	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	755	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	282	DRAIN	02/18/2019	02/18/2019	Visual	DRY	ADD WATER
AU2	765	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	778	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	780	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	299	DRAIN	02/18/2019	02/18/2019	Visual	DRY	ADD WATER
UU3	311	DRAIN	02/18/2019	02/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	901490RB	VENT	02/18/2019	02/18/2019	Visual	TRIPPED	RESET

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU3	321	DRAIN	02/18/2019	02/18/2019	Visual	DRY	ADD WATER
ARU	901748RA	VENT	02/18/2019	02/18/2019	Visual	TRIPPED	RESET
ENVFAC	901447RE	VENT	02/18/2019	02/18/2019	Visual	TRIPPED	RESET
ENVFAC	901447RH	VENT	02/18/2019	02/18/2019	Visual	TRIPPED	RESET
ENVFAC	8090A	SEWERLINE	02/18/2019	4/23/2019	Visual	PUMP SEAL	DOR REPLACED BEARINGS AND SEAL
UU3	368	DRAIN	02/19/2019	02/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	369	DRAIN	02/19/2019	03/06/2019	Visual	CLOGGED	ADD WATER
UU3	374	DRAIN	02/19/2019	02/19/2019	Visual	DRY	ADD WATER
UU3	418	DRAIN	02/19/2019	03/06/2019	M21	DRAIN LEAKING	FLUSHED WITH WATER
UU3	424	DRAIN	02/19/2019	02/21/2019	M21	DRAIN LEAKING	FLUSHED WITH WATER
UU3	427	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	428	DRAIN	02/20/2019	03/07/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
UU3	429	DRAIN	02/20/2019	03/06/2019	M21	DRAIN LEAKING	FLUSHED WITH WATER
UU3	430	DRAIN	02/20/2019	03/06/2019	Visual	CLOGGED	ADD WATER
UU3	431	DRAIN	02/20/2019	03/07/2019	Visual	CLOGGED	ADD WATER
UU3	433	DRAIN	02/20/2019	03/07/2019	Visual	CLOGGED	ADD WATER
UU3	435	DRAIN	02/20/2019	03/06/2019	Visual	CLOGGED	ADD WATER
UU3	437	DRAIN	02/20/2019	03/07/2019	M21	DRAIN LEAKING	FLUSHED WITH WATER
UU3	441	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	442	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	444	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	446	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	447	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	451	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	452	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	460	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	467	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	476	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	478	DRAIN	02/20/2019	02/20/2019	Visual	DRY	ADD WATER
UU3	506	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	506A	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	506B	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	506C	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	506D	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	510	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	513	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU3	513A	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	514	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	516	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	520	DRAIN	02/20/2019	02/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	556	DRAIN	02/25/2019	02/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	564	DRAIN	02/25/2019	02/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	571	DRAIN	02/25/2019	02/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	574	DRAIN	02/25/2019	02/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	579	DRAIN	02/25/2019	02/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	581	DRAIN	02/25/2019	02/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	583	DRAIN	02/25/2019	02/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	585	DRAIN	02/25/2019	02/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	586	DRAIN	02/25/2019	02/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	588	DRAIN	02/25/2019	02/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	589	DRAIN	02/25/2019	02/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	593	DRAIN	02/25/2019	02/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	595	DRAIN	02/25/2019	02/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	600	DRAIN	02/25/2019	02/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	604	DRAIN	02/25/2019	02/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	613	DRAIN	02/25/2019	02/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	901679RA	VENT	02/25/2019	02/25/2019	Visual	TRIPPED	RESET
ULC	901490RB	VENT	02/25/2019	02/25/2019	Visual	TRIPPED	RESET
ARU	901748RA	VENT	02/25/2019	02/25/2019	Visual	TRIPPED	RESET
ENVFAC	901447RH	VENT	02/25/2019	02/25/2019	Visual	TRIPPED	RESET
UU3	529	DRAIN	02/25/2019	02/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	531	DRAIN	02/25/2019	02/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1609	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1651	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1653	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1655	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1656	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1659	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1660	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1664	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1666	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1668	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1669	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1671	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1676	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1680	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1688	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1703	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1705	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1706	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1708	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1681	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1712	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1714	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1716	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1717	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1718	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1720	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1723	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1724	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1725	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1728	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1733	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1735	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1738	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1740	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1741	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1744	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1745	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1747	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1749	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1813	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1814	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1816	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1817	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1821	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1822	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1823	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1825	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1827	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1829	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1830	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1834	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1836	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1841	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1842	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1843	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1848	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1851	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1855	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1856	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1861	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1867	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1872	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1873	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1877	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1883	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1884	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1888	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1889	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1893	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1894	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1905	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1906	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1918	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1937	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1938	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1939	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6812	VENT	03/04/2019	03/04/2019	Visual	TRIPPED	RESET
RHU	6822AA	VENT	03/04/2019	03/04/2019	Visual	TRIPPED	RESET
PS3B	Rik901674RA	VENT	03/04/2019	03/04/2019	Visual	TRIPPED	RESET
AU2	706	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	707	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	709	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
AU2	711	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	712	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	713	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	717A	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	725	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	726	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	728	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	729	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	730	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	731	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	732	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	733	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	735	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	736	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	744	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	753	DRAIN	03/04/2019	03/04/2019	Visual	DRY	ADD WATER
AU2	756	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	757	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	758	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	765	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	776	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	777	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	778	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	779	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	785	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	787	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	786	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	826	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	827	DRAIN	03/04/2019	03/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1153	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1155	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1156	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1158	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1162	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1164	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1168	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ULC	1169	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1171	DRAIN	03/05/2019	03/05/2019	Visual	DRY	ADD WATER
ULC	1178	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1180	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1182	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1184	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1187	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1196	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1203	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1207	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1208	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1212	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1218	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1223	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1230	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1233	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1241	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1243	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1263	DRAIN	03/05/2019	03/05/2019	Visual	DRY	ADD WATER
ULC	1267	DRAIN	03/05/2019	03/05/2019	Visual	DRY	ADD WATER
ULC	1273	DRAIN	03/05/2019	03/05/2019	Visual	DRY	ADD WATER
ULC	1287	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ULC	1289A	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1296	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1297	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1298	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1299	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1304	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1305	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1313	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1315	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1317	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1322	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1323	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1332	DRAIN	03/05/2019	03/05/2019	Visual	CLOGGED	CLEANED OUT
ULC	1341	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ULC	1355	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1358	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1359A	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1401	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1442	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1455	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1456	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1465	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1466	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1467	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1472	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1473	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1474	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1475	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1477	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1478	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1481	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1485	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1487	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	901748RA	VENT	03/05/2019	03/05/2019	Visual	TRIPPED	RESET
ULC	1488	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1495	DRAIN	03/05/2019	03/05/2019	Visual	DRY	ADD WATER
ULC	1497	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1506	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1507	DRAIN	03/05/2019	03/05/2019	Visual	DRY	ADD WATER
ULC	1513	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1519	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1520	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1527	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1540	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1541	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1542B	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1542C	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1557A	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1579A	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1582	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

Table 2
BWON Inspection and Monitoring Exceptions
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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ENVFAC	901447RH	VENT	03/05/2019	03/05/2019	Visual	TRIPPED	RESET
PS3B	2754	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2755	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2755A	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2756	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2759	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2760	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2768	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2767	DRAIN	03/05/2019	03/20/2019	Visual	CLOGGED	CLEANED OUT
PS3B	2776	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2788	DRAIN	03/05/2019	03/05/2019	Visual	DRY	ADD WATER
PS3B	2789	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2799	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2800	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2802	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2803	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2804	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2805	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2812	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2823	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2831	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2832	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2833	DRAIN	03/05/2019	03/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	651	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	652	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	654	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	655	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	658	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	684	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	688	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	689	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	690	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	254	DRAIN	03/06/2019	03/06/2019	Visual	DRY	ADD WATER
UU3	282	DRAIN	03/06/2019	03/06/2019	Visual	DRY	ADD WATER
UU3	288	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	289	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU3	290	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	299	DRAIN	03/06/2019	03/06/2019	Visual	DRY	ADD WATER
UU3	300	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	301	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	304	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	307	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	308	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	309	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	311	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	312	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	313	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	316	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	321	DRAIN	03/06/2019	03/06/2019	Visual	DRY	ADD WATER
UU3	322	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	323	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	324	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	326	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	331	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	332	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	338	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	339	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	340	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	341	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	342	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	343	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	344	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	345	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	347	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	349	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	350	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	351	DRAIN	03/06/2019	03/06/2019	Visual	DRY	ADD WATER
UU3	353	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	358	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	359	DRAIN	03/06/2019	03/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	372	DRAIN	03/06/2019	03/06/2019	Visual	DRY	ADD WATER
UU3	373	DRAIN	03/06/2019	03/06/2019	Visual	DRY	ADD WATER

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BWON Inspection and Monitoring Exceptions
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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU3	374	DRAIN	03/06/2019	03/06/2019	Visual	DRY	ADD WATER
UU3	386	DRAIN	03/06/2019	03/06/2019	Visual	DRY	ADD WATER
UU3	417	DRAIN	03/06/2019	03/20/2019	Visual	CLOGGED	VACUUM OUT
UU3	420	DRAIN	03/06/2019	03/20/2019	Visual	CLOGGED	VACUUM OUT
UU3	421	DRAIN	03/06/2019	03/20/2019	Visual	CLOGGED	VACUUM OUT
UU3	442	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	444	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	448	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	449	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	451	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	452	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	460	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	464	DRAIN	03/06/2019	03/07/2019	Visual	DRY	ADD WATER
UU3	473	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	478	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	506B	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	506D	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	510	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	513	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	513A	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	516	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	517	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	556	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	559	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	560	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	574	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	577	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	579	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	581	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	585	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	586	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	595	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	600	DRAIN	03/06/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	906	DRAIN	03/07/2019	03/07/2019	Visual	DRY	ADD WATER
DDU	928	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	930	DRAIN	03/07/2019	03/07/2019	Visual	DRY	ADD WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
DDU	932	DRAIN	03/07/2019	03/07/2019	Visual	DRY	ADD WATER
DDU	938	DRAIN	03/07/2019	03/07/2019	Visual	DRY	ADD WATER
DDU	948	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	950	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	960	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	967	DRAIN	03/07/2019	03/07/2019	Visual	DRY	ADD WATER
DDU	980	DRAIN	03/07/2019	03/07/2019	Visual	DRY	ADD WATER
DDU	995	DRAIN	03/07/2019	03/07/2019	Visual	DRY	ADD WATER
DDU	1000	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1002	DRAIN	03/07/2019	03/07/2019	Visual	DRY	ADD WATER
DDU	1005	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1008	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1011	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1013	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1023	DRAIN	03/07/2019	03/07/2019	Visual	DRY	ADD WATER
DDU	1028	DRAIN	03/07/2019	03/07/2019	Visual	DRY	ADD WATER
DDU	1032	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1033	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1034	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1035	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1037	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1038	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1040	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070G	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070I	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070L	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1071	DRAIN	03/07/2019	03/07/2019	Visual	DRY	ADD WATER
DDU	1077	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1080	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1084	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1086	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1103	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1107	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1128	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	11	DRAIN	03/07/2019	03/07/2019	Visual	DRY	ADD WATER
UU4	27	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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BWON Inspection and Monitoring Exceptions
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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU4	28	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	30	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	31	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	32	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	35	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	37	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	38	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	39	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	40	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	43	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	44	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	47	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	63	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	64	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	65	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	72A	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	81	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	82	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	83	DRAIN	03/07/2019	03/07/2019	Visual	DRY	ADD WATER
UU4	85	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	87	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	88	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	89	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	90	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	93	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	94	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	101	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	119	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	120	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	127	DRAIN	03/07/2019	03/07/2019	Visual	DRY	ADD WATER
UU4	142	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	152	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	190	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	192	DRAIN	03/07/2019	03/07/2019	Visual	CLOGGED	ADD WATER
UU4	206	DRAIN	03/07/2019	03/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	206A	DRAIN	03/07/2019	03/07/2019	Visual	DRY	ADD WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	Rik901674RA	VENT	03/11/2019	03/11/2019	Visual	TRIPPED	RESET
ARU	901748RA	VENT	03/11/2019	03/11/2019	Visual	TRIPPED	RESET
ENVFAC	901447RH	VENT	03/11/2019	03/11/2019	Visual	TRIPPED	RESET
PS3B	2838	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2840	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2841	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2842	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2843	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2845	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2846	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2847	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2850	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2851	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2852	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2857	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2862	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2863	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2891	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2894	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2896	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2896A	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2901	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2904	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2907A	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2910	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2923	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2959	DRAIN	03/12/2019	03/27/2019	Visual	CLOGGED	CLEANED OUT
PS3B	2964	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2968	DRAIN	03/12/2019	03/12/2019	Visual	DRY	ADD WATER
PS3B	2973	DRAIN	03/12/2019	03/27/2019	Visual	CLOGGED	HYDROBLAST
PS3B	2973A	DRAIN	03/12/2019	03/27/2019	Visual	CLOGGED	HYDROBLAST
PS3B	2973B	DRAIN	03/12/2019	03/27/2019	Visual	CLOGGED	HYDROBLAST
PS3B	2977	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2979	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2980	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2992	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2993	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3012	DRAIN	03/12/2019	03/27/2019	Visual	FILLED W/OIL	HYDROBLAST
PS3B	3019	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3020	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3021	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3022	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025B	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025E	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3035	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3044	DRAIN	03/12/2019	03/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3056	OWSEP	03/13/2019	03/20/2019	M21	GASKET	TIGHTEN HATCH
RHU	5367	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5368	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5369	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5370	DRAIN	03/13/2019	03/14/2019	Visual	DRY	ADD WATER
RHU	5374	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5376	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5378	DRAIN	03/13/2019	03/14/2019	Visual	DRY	ADD WATER
RHU	5402	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5404	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5414	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5431	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5432	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5433	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5434	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3061	OWSEP	03/13/2019	03/18/2019	Visual/M21	GASKET	INSTALL SEALANT
PS3B	3061	OWSEP	03/13/2019	03/20/2019	Visual/M21	GASKET	INSTALL SEALANT
RHU	4595	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5263	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5266	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5267	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5269	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5270	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5274	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5276	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5279	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	5284	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5285	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5286	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5287	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5293	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6002	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6010	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6014	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6015	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6016	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6022	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6023	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6025	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6026	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6066	DRAIN	03/13/2019	03/14/2019	Visual	DRY	ADD WATER
RHU	6071	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6072	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6075	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6076	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4238	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4251	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4253	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4342	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4344	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2785	DRAIN	03/13/2019	03/27/2019	Visual	CLOGGED	CLEANED OUT
RHU	4552	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4562	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4104	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4118	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4156	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4158	DRAIN	03/13/2019	03/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2102	DRAIN	03/14/2019	03/20/2019	Visual	CLOGGED	CLEANED OUT
FCCU1	2133	DRAIN	03/14/2019	03/14/2019	Visual	DRY	ADD WATER
FCCU1	2136	DRAIN	03/14/2019	03/14/2019	Visual	DRY	ADD WATER
FCCU1	2142	DRAIN	03/14/2019	03/14/2019	Visual	DRY	ADD WATER
FCCU1	2143	DRAIN	03/14/2019	03/14/2019	Visual	DRY	ADD WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
FCCU1	2144	DRAIN	03/14/2019	03/14/2019	Visual	DRY	ADD WATER
FCCU1	2149	DRAIN	03/14/2019	03/14/2019	Visual	DRY	ADD WATER
FCCU1	2150	DRAIN	03/14/2019	03/14/2019	Visual	DRY	ADD WATER
RHU	4211	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4213	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4214	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4215	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4216	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2156	DRAIN	03/14/2019	03/20/2019	Visual	CLOGGED	CLEANED OUT
RHU	4225	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4228	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6505	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6620	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6622	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6635	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2158	DRAIN	03/14/2019	03/20/2019	Visual	CLOGGED	CLEANED OUT
FCCU1	2157	DRAIN	03/14/2019	03/20/2019	Visual	CLOGGED	CLEANED OUT
FCCU1	2159	DRAIN	03/14/2019	03/14/2019	Visual	DRY	ADD WATER
FCCU1	2160	DRAIN	03/14/2019	03/20/2019	Visual	CLOGGED	CLEANED OUT
FCCU1	2176	DRAIN	03/14/2019	03/20/2019	Visual	CLOGGED	CLEANED OUT
FCCU1	2181	DRAIN	03/14/2019	03/20/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
FCCU1	2182	DRAIN	03/14/2019	03/20/2019	Visual	CLOGGED	CLEANED OUT
FCCU1	2179	DRAIN	03/14/2019	03/20/2019	Visual	CLOGGED	CLEANED OUT
FCCU1	2183	DRAIN	03/14/2019	03/20/2019	Visual	CLOGGED	CLEANED OUT
FCCU1	2187	DRAIN	03/14/2019	03/20/2019	Visual	CLOGGED	CLEANED OUT
RHU	3786	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2191A	DRAIN	03/14/2019	03/20/2019	Visual	CLOGGED	CLEANED OUT
RHU	3802	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2193	DRAIN	03/14/2019	03/20/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
RHU	3810	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3811	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3812	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3813	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3815	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3820	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3821	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	3822	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3823	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2185	DRAIN	03/14/2019	03/20/2019	Visual	CLOGGED	CLEANED OUT
FCCU1	2201	DRAIN	03/14/2019	03/20/2019	Visual	CLOGGED	CLEANED OUT
FCCU1	2203	DRAIN	03/14/2019	03/20/2019	Visual	CLOGGED	CLEANED OUT
FCCU1	2207	DRAIN	03/14/2019	03/20/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
FCCU1	2225	DRAIN	03/14/2019	03/20/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
RHU	3830	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3832	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3833	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3837	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3838	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3841	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3842	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3844	DRAIN	03/14/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3103	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3104	DRAIN	03/15/2019	03/15/2019	Visual	DRY	ADD WATER
PS3A	3107	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3120	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3121	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3122	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3126	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3127	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3131	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3135	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3137	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3138	DRAIN	03/15/2019	03/15/2019	Visual	DRY	ADD WATER
PS3A	3142	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3461	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3467	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3176	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3177	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3178	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3470	DRAIN	03/15/2019	03/28/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
CFHU	3474	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3478	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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CFHU	3479	DRAIN	03/15/2019	03/28/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
CFHU	3481	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3489	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3490	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3492	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3496	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3498	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3502	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3503	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3189	DRAIN	03/15/2019	03/15/2019	Visual	DRY	ADD WATER
CFHU	3515	DRAIN	03/15/2019	03/28/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3197	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3211	DRAIN	03/15/2019	03/29/2019	Visual	CLOGGED	HYDROBLAST
PS3A	3227	DRAIN	03/15/2019	03/15/2019	Visual	DRY	ADD WATER
CFHU	3516	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3518	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3519	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3275	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3276	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3550	DRAIN	03/15/2019	03/28/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3319A	DRAIN	03/15/2019	03/15/2019	Visual	DRY	ADD WATER
PS3A	3337	CLEAN-OUT	03/15/2019	03/20/2019	Visual	MISSING CAP	INSTALL CAP
CFHU	3564	DRAIN	03/15/2019	03/15/2019	Visual	DRY	ADD WATER
CFHU	3569	DRAIN	03/15/2019	03/15/2019	Visual	DRY	ADD WATER
CFHU	3570	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3571	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3573	DRAIN	03/15/2019	03/15/2019	Visual	DRY	ADD WATER
PS3A	3349	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3349A	DRAIN	03/15/2019	03/29/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
PS3A	3350	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3353	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3577	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3356	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3584	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3360A	DRAIN	03/15/2019	03/29/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
CFHU	3590	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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CFHU	3591	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3592	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3594	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3596	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3599	DRAIN	03/15/2019	03/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3580	DRAIN	03/15/2019	03/15/2019	Visual	DRY	ADD WATER
CFHU	3574	DRAIN	03/15/2019	03/15/2019	Visual	DRY	ADD WATER
PS3A	3366	DRAIN	03/15/2019	03/15/2019	Visual	DRY	ADD WATER
PS3A	3371A	DRAIN	03/15/2019	03/15/2019	Visual	DRY	ADD WATER
PS3A	3374	DRAIN	03/15/2019	03/29/2019	Visual	CLOGGED	HYDROBLAST
PS3A	3375B	DRAIN	03/15/2019	03/15/2019	Visual	DRY	ADD WATER
FCCU3	2090	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2091	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2416	DRAIN	03/16/2019	03/16/2019	Visual	DRY	ADD WATER
FCCU3	2417	DRAIN	03/16/2019	03/16/2019	Visual	DRY	ADD WATER
FCCU3	2435	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2440	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2442	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2447	DRAIN	03/16/2019	03/16/2019	Visual	DRY	ADD WATER
FCCU3	2466	DRAIN	03/16/2019	03/16/2019	Visual	DRY	ADD WATER
FCCU3	2515	DRAIN	03/16/2019	03/16/2019	Visual	DRY	ADD WATER
FCCU3	2522	DRAIN	03/16/2019	03/18/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
FCCU3	2531	DRAIN	03/16/2019	03/16/2019	Visual	DRY	ADD WATER
FCCU3	2540	DRAIN	03/16/2019	03/18/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
CFHU	3600	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
CFHU	3603	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3605	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3608	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3629	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3635	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3643	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3655	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3660	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3662	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3664	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3665	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
CFHU	3666	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3671	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3679	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3681	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3682	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2559	DRAIN	03/16/2019	03/18/2019	Visual	CLOGGED	ADD WATER
CFHU	3684	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3685	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
CFHU	3686	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3687	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3688A	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3689	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2571	DRAIN	03/16/2019	03/18/2019	Visual	CLOGGED	ADD WATER
CFHU	3692	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3694	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3697	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3698	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3699	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3701	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3702	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3703	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3706	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3708	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2599A	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2601	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2602	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2604A	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2607	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2612	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2614	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2615	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2621	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2625	DRAIN	03/16/2019	03/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2634	DRAIN	03/16/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2635	DRAIN	03/16/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2636	DRAIN	03/16/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
FCCU3	2638	DRAIN	03/16/2019	03/18/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
FCCU3	2639	DRAIN	03/16/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2650	DRAIN	03/16/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4572	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4574	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4577	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4579	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4608	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4613	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4615	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4617	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4618	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4619	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4633	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4634	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4638	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4641	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4649	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4651	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4653	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4658	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4661	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4663	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4673	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4674	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4692	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4701	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4704	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4710	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4717	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4717A	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4720	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4734	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4736	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4749	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4779	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	4780	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4785	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4786	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4790	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4792	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4794	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4795	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4798	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5177	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	Rik901674RA	VENT	03/18/2019	03/18/2019	Visual	TRIPPED	RESET
RHU	5182	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5183	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2654	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	901679RA	VENT	03/18/2019	03/18/2019	Visual	TRIPPED	RESET
FCCU3	2733	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2734	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2736	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2738	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2739	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2740	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2741	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2742	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3869	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3870	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3875	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3878	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3879	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3881	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3883	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3887	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3888	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3889	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3890	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3894	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3895	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3900	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	3901	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3903	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3905	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3909	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3915	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3916	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3926	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3927	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3930	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3931	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3932	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3936	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3937	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3939	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3941	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3950	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3951	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3952	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3956	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3964	DRAIN	03/18/2019	03/18/2019	Visual	DRY	ADD WATER
RHU	3965	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3967	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3972	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3973	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3978	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3979	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3980	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3982	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3983	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3989	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3991	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3994	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3995	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4002	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4006	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4007	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	6848	DRAIN	03/18/2019	03/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	901748RA	VENT	03/18/2019	03/18/2019	Visual	TRIPPED	RESET
ENVFAC	901447RH	VENT	03/18/2019	03/18/2019	Visual	TRIPPED	RESET
COKERS	4359	DRAIN	03/19/2019	03/19/2019	Visual	DRY	ADD WATER
COKERS	4385	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4389	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4395	DRAIN	03/19/2019	03/19/2019	Visual	DRY	ADD WATER
COKERS	4405	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4406	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4409A	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4415	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4416B	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4417	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4418	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4421	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4424	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4425	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4431	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4804	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4805	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4809	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4819	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4823	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4829	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4832A	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4849	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4909	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4910	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4911	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4912	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4913	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4914	DRAIN	03/19/2019	03/19/2019	Visual	CLOGGED	ADD WATER
COKERS	4918	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4922	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4923	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4926	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
COKERS	4927	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4928	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4929	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4931	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4932	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4936	DRAIN	03/19/2019	03/19/2019	Visual	CLOGGED	ADD WATER
RDU	4455	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4460	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4461	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4464	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4466	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4467	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4468	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4469	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3406	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3409	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3410	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3412	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3423	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3424	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3425	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3433	DRAIN	03/19/2019	04/02/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3433A	DRAIN	03/19/2019	04/02/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3438	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3742	JCTBOX	03/19/2019	03/25/2019	Visual/M21	GASKET	TIGHTEN HATCH
PS3A	3743	JCTBOX	03/19/2019	03/19/2019	M21	HATCH	INSTALL SEALANT
RDU	4452	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4458	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4462	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4471	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4472	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4473	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4475	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4476	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4480	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4483	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RDU	4484	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4485	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4499	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4502	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4504	DRAIN	03/19/2019	03/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
HRU	5208	DRAIN	03/20/2019	03/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
HRU	5209	DRAIN	03/20/2019	03/20/2019	Visual	DRY	ADD WATER
HRU	5210	DRAIN	03/20/2019	03/20/2019	Visual	DRY	ADD WATER
HRU	5215	DRAIN	03/20/2019	03/20/2019	Visual	DRY	ADD WATER
HRU	5217	DRAIN	03/20/2019	03/20/2019	Visual	DRY	ADD WATER
HRU	5219	DRAIN	03/20/2019	03/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
HRU	5228	DRAIN	03/20/2019	03/20/2019	Visual	DRY	ADD WATER
HRU	5229	DRAIN	03/20/2019	03/20/2019	Visual	DRY	ADD WATER
HRU	5240	DRAIN	03/20/2019	03/20/2019	Visual	DRY	ADD WATER
HRU	5244	DRAIN	03/20/2019	03/20/2019	Visual	DRY	ADD WATER
HRU	5254A	DRAIN	03/20/2019	03/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
HRU	5256	DRAIN	03/20/2019	03/20/2019	Visual	DRY	ADD WATER
PS3A	3742	JCTBOX	03/20/2019	03/25/2019	Visual/M21	GASKET	TIGHTEN HATCH
COKERS	901679RA	VENT	03/25/2019	03/25/2019	Visual	TRIPPED	RESET
ARU	901748RA	VENT	03/25/2019	03/25/2019	Visual	TRIPPED	RESET
ENVFAC	901447RH	VENT	03/25/2019	03/25/2019	Visual	TRIPPED	RESET
ENVFAC	5092	DRAIN	04/01/2019	04/04/2019	Visual	FILLED W/ OIL	FLUSHED W/ WATER
RHU	3757	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3759	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3768	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3770	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3778	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3781	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3785	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3788	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3790	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3795	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3798	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3799	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3802	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3803	JCTBOX	04/01/2019	04/01/2019	M21	COVER PLATE	INSTALL SEALANT

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	3804	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3810	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3811	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3812	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3815	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3817	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3820	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3821	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3822	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3827	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3830	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RB	VENT	04/01/2019	04/01/2019	Visual	TRIPPED	RESET
RHU	3832	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3833	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RC	VENT	04/01/2019	04/01/2019	Visual	TRIPPED	RESET
RHU	3835	JCTBOX	04/01/2019	04/01/2019	Visual/M21	MISSING BOLTS	INSTALL SEALANT
RHU	3837	DRAIN	04/01/2019	04/01/2019	Visual	CLOGGED	ADD WATER
ENVFAC	901447RH	VENT	04/01/2019	04/01/2019	Visual	TRIPPED	RESET
RHU	3841	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3842	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3844	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3873	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3875	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3879	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3880	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3881	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3883	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3887	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3888	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3889	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3890	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3894	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3903	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3915	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3916	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3920	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	3926	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3927	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3930	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3931	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3932	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3936	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3937	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3939	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3941	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3949	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3951	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3952	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3956	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3964	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3965	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3967	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3969	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3972	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3973	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3979	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3980	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3982	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3986	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3988	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3989	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3991	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3994	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3995	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3999	JCTBOX	04/01/2019	04/01/2019	Visual/M21	MISSING BOLTS	INSTALL SEALANT
RHU	4002	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4006	DRAIN	04/01/2019	04/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4118	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4119	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4121	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4132	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4136	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	4138	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4150	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4151	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4153	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4155	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4156	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4157	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4158	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4164	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4166	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4176	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4192	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4203	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4207	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4213	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4215	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4225	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	25	CLEAN-OUT	04/02/2019	04/04/2019	Visual	MISSING CAP	INSTALLED CAP
UU4	27	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	28	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	30	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	31	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	32	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	33	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU4	34	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU4	35	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	36	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU4	37	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	38	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	39	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	40	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	43	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	44	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	63	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	64	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	65	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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UU4	66	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	81	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	82	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	87	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	88	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	89	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	90	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	91	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	93	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	94	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	101	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	119	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	120	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4245	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4251	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4253	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	134	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4258	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4263	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4281	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4282	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4285	DRAIN	04/02/2019	04/02/2019	Visual	DRY	ADD WATER
RHU	4287	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4289	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4292	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4298	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	192	DRAIN	04/02/2019	04/17/2019	Visual	CLOGGED	CLEANED OUT
UU4	194	DRAIN	04/02/2019	04/17/2019	Visual	CLOGGED	CLEANED OUT/ADD WATER
UU4	195	CLEAN-OUT	04/02/2019	04/04/2019	Visual	MISSING CAP	INSTALLED CAP
UU4	196	DRAIN	04/02/2019	04/17/2019	Visual	CLOGGED	CLEANED OUT/ADD WATER
RHU	4319	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	206A	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
RHU	4329	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4335	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4337	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4341	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	4342	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4551A	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4552	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4554	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4556	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1653	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1655	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1656	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1659	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4574	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1660	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4579	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1664	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4580	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4582	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1666	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1668	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1669	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1671	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4587	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1676	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4588	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4592	DRAIN	04/02/2019	04/02/2019	Visual	DRY	ADD WATER
ARU	1680	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4594	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1681	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1687	DRAIN	04/02/2019	04/17/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
RHU	4600	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1703	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1705	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4604	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4605	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1706	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1708	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1712	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1714	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1716	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1717	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4608	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4609	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1718	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4610	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1719	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4611	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4613	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4615	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1720	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4617	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4618	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4619	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1723	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1724	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1725	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1728	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4633	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4634	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4636	DRAIN	04/02/2019	04/02/2019	Visual	CLOGGED	ADD WATER
RHU	4639	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4643	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4645	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4649	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4651	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4653	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4658	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4661	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4663	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1733	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1735	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1738	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1740	DRAIN	04/02/2019	04/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	299	DRAIN	04/03/2019	04/03/2019	Visual	DRY	ADD WATER
RHU	4673	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	4674	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4677	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4689	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4700	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4701	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4704	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4707	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4712	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4717	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4717A	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4720	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4726	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4732	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4734	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4736	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4740	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4744	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4749	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5183	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5192	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	300	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	301	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	304	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	307	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	308	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	309	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	312	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	313	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	316	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	321	DRAIN	04/03/2019	04/03/2019	Visual	DRY	ADD WATER
UU3	322	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	323	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	325	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	326	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	329	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	331	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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UU3	332	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	333	DRAIN	04/03/2019	04/17/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
UU3	338	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	339	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	340	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	341	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	342	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	344	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	350	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	351	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	372	DRAIN	04/03/2019	04/17/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	383	DRAIN	04/03/2019	04/03/2019	Visual	DRY	ADD WATER
RHU	4779	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4780	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4786	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4790	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4792	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4794	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4797	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4798	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	420	DRAIN	04/03/2019	04/16/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
UU3	421	DRAIN	04/03/2019	04/16/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
RHU	5262	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	428	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5266	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5267	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5269	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5270	DRAIN	04/03/2019	04/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5272	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5274	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5276	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5279	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5282	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5284	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5285	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5286	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	5287	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5292	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5293	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5295	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5306	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5308	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5316	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5317	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5318	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5326	JCTBOX	04/04/2019	04/04/2019	M21	COVER PLATE	INSTALL SEALANT
RHU	5330	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6002	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6004	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6005	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6006	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6007	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6008	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6010	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6013	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6014	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6015	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6016	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6017	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6020	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6022	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6023	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6024	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6025	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6026	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6033	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6042	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6075	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5364	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5367	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5368	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5369	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	5370	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5378	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5402	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5404	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5407	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5408	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5411	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5413	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5414	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5403	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6507	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6518	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6520	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6524	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6530	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6535	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6537	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6542	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6552	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6553	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6556	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6557	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6560	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6562	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6564	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6577	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6610	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6619	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6620	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6622	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6628	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6630	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6631	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6635	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3794	DRAIN	04/04/2019	04/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	901490RB	VENT	04/08/2019	04/08/2019	Visual	TRIPPED	RESET

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	6824AU.01	CONECT	04/08/2019	04/16/2019	M21	CONNECTOR LEAKING	TIGHTEN CONN
ENVFAC	901447RH	VENT	04/08/2019	04/08/2019	Visual	TRIPPED	RESET
RHU	6848	DRAIN	04/08/2019	04/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
HRU	5217	DRAIN	04/08/2019	04/08/2019	Visual	DRY	ADD WATER
HRU	5227	DRAIN	04/08/2019	04/08/2019	Visual	DRY	ADD WATER
HRU	5228	DRAIN	04/08/2019	04/08/2019	Visual	DRY	ADD WATER
HRU	5237	DRAIN	04/08/2019	04/08/2019	Visual	DRY	ADD WATER
RHU	6831AA	VENT	04/08/2019	04/08/2019	Visual	TRIPPED	RESET
RHU	6812	VENT	04/08/2019	04/08/2019	Visual	TRIPPED	RESET
CFHU	3459	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3461	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3467	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3474	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3489	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3490	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3496	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3498	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3500	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3502	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3503	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3504	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3513	DRAIN	04/09/2019	04/09/2019	Visual	DRY	ADD WATER
CFHU	3516	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3519	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3570	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3571	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3577	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3582	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3584	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3596	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3599	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3604	DRAIN	04/09/2019	04/09/2019	Visual	DRY	ADD WATER
CFHU	3605	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3608	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3614	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3615	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
CFHU	3616	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3618	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3629	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3635	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3660	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3661	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3662	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3665	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3666	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3667	DRAIN	04/09/2019	04/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3669	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3672	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3675	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3678	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3679	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3681	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3682	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3684	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3685	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3686	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3687	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3688A	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3689	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3691	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3692	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3694	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3697	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3698	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3699	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3702	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3703	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3705	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3706	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3708	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3710	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3712	DRAIN	04/09/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
FCCU3	2080	DRAIN	04/10/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2081	DRAIN	04/10/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2090	DRAIN	04/10/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2091	DRAIN	04/10/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2430	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2431	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2434	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2435	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2437	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2440	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	948	DRAIN	04/10/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2442	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2447	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2459	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2461	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	961	DRAIN	04/10/2019	04/10/2019	Visual	DRY	ADD WATER
FCCU3	2474	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	976	DRAIN	04/10/2019	04/10/2019	Visual	DRY	ADD WATER
DDU	983	DRAIN	04/10/2019	04/10/2019	Visual	DRY	ADD WATER
DDU	986	DRAIN	04/10/2019	04/10/2019	Visual	DRY	ADD WATER
DDU	987	DRAIN	04/10/2019	04/10/2019	Visual	DRY	ADD WATER
FCCU3	2513	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2515	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2558	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2561	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2562	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2571	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2572	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2573	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2582	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1024	DRAIN	04/10/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2603	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1032	DRAIN	04/10/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2604	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1033	DRAIN	04/10/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2606	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
DDU	1034	DRAIN	04/10/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1035	DRAIN	04/10/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2607	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1037	DRAIN	04/10/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1038	DRAIN	04/10/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2614	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2615	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2621	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2624	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2631	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2634	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2635	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2636	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2637	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2641	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2642	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2644	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2645	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2654	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070I	DRAIN	04/10/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070K	DRAIN	04/10/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070L	DRAIN	04/10/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2662	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2664	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2672	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2679	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1102	DRAIN	04/10/2019	04/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2680	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2681	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2682	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2684	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2685	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2739	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2740	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2741	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2742	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
FCCU3	2744	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2745	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2746	DRAIN	04/10/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1743	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1744	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1745	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1747	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1749	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1750	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1791	DRAIN	04/11/2019	04/11/2019	Visual	DRY	ADD WATER
ARU	1813	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1814	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1816	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1817	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1821	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1823	DRAIN	04/11/2019	04/11/2019	Visual	DRY	ADD WATER
ARU	1825	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1826	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1829	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1830	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1831	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1832	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1834	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1838	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1839	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1841	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1842	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1843	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1845	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1846	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1848	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1851	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1852	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1855	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1856	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1857	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1858	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1860	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1861	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1867	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1871	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1872	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1873	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1875	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1876	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1877	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1878	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1881	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1883	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1884	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1887	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1888	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1889	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1893	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1894	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1905	DRAIN	04/11/2019	04/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RE	VENT	04/15/2019	04/15/2019	Visual	TRIPPED	RESET
ENVFAC	901447RH	VENT	04/15/2019	04/15/2019	Visual	TRIPPED	RESET
ULC	901490RB	VENT	04/15/2019	04/15/2019	Visual	TRIPPED	RESET
ARU	901748RA	VENT	04/15/2019	04/15/2019	Visual	TRIPPED	RESET
PS3A	3101	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3103	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3104	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3114	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3120	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3121	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3122	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3126	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3127	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3131	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3135	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3137	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3A	3138	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3141	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3142	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3161	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3169A	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3170	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3171	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3173	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3174	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3175	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3176	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3177	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3178	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3181	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3187	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3197	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3198	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3214	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3215	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3216	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3217	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3251	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3261	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3262	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3263	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3269	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3270	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3271	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3272	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3274	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3278	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3279	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3280	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3281	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3282	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3287	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3A	3291	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3292	DRAIN	04/15/2019	04/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3297	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	901690RA	VENT	04/15/2019	04/15/2019	Visual	TRIPPED	RESET
PS3A	3310	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3319A	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3319B	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3320	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3321	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3349	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3349A	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3351	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3353	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3356	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3362	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3363	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3364	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3385	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3389	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3406	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3410	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3414	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3418	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3423	DRAIN	04/15/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2752	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2753	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2754	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2755	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2755A	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2757	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2759	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2760	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2781	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2786	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2788	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2794	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2797	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2799	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2800	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2802	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2804	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2814	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2823	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2828	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2829	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2831	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2832	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2833	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2838	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2841	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2842	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2843	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2845	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2846	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2847	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2849	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2850	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2851	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2852	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2853	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2854	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2857	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2858	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2859	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2861	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2862	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2863	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2869	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2871	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2891	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2894	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2896	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2896A	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2899	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2904	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2906	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2922	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2922B	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2923	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2924	DRAIN	04/16/2019	04/16/2019	Visual	DRY	ADD WATER
PS3B	2926	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2927	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2928	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2935	DRAIN	04/16/2019	04/16/2019	Visual	DRY	ADD WATER
PS3B	2936	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2937	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2939	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2940	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2943	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2944	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2964	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2965	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2967	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2977	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2979	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2980	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2981	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2984	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2985	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2993	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2994	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1651	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3019	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1638	JCTBOX	04/16/2019	04/23/2019	M21	GASKET	INSTALL SEALANT
PS3B	3020	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3021	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3022	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025D	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU3	430	DRAIN	04/16/2019	05/01/2019	Visual	CLOGGED	HYDROBLAST
UU3	431	DRAIN	04/16/2019	05/01/2019	Visual	CLOGGED	HYDROBLAST
UU3	433	DRAIN	04/16/2019	05/01/2019	Visual	CLOGGED	HYDROBLAST
UU3	435	DRAIN	04/16/2019	05/01/2019	Visual	CLOGGED	HYDROBLAST
UU3	441	DRAIN	04/16/2019	04/16/2019	Visual	DEBRIS	CLEANED OUT
UU3	452	DRAIN	04/16/2019	04/16/2019	Visual	DRY	ADD WATER
UU3	456B	DRAIN	04/16/2019	04/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	506C	DRAIN	04/17/2019	04/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	506D	DRAIN	04/17/2019	04/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	513	DRAIN	04/17/2019	04/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	522	DRAIN	04/17/2019	04/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	523	DRAIN	04/17/2019	04/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	558	DRAIN	04/17/2019	04/17/2019	Visual	DRY	ADD WATER
UU3	571	DRAIN	04/17/2019	04/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	574	DRAIN	04/17/2019	04/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	579	DRAIN	04/17/2019	04/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	581	DRAIN	04/17/2019	04/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	583	DRAIN	04/17/2019	04/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	595	DRAIN	04/17/2019	04/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	605	DRAIN	04/17/2019	04/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	608	DRAIN	04/17/2019	04/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	613	DRAIN	04/17/2019	04/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4352	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4354	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4372	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4386	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4394	DRAIN	04/18/2019	04/18/2019	Visual	DRY	ADD WATER
COKERS	4409B	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4410	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4417	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4418	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4419	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4421	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4424	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4425	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4429	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
COKERS	4805	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4806	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4807	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4808	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4818	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4819	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4820	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4823	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4824	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4825	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4829	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4832A	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4844	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4848	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4849	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4850	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4852	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4852A	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4865A	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4909	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4910	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4911	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4912	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4918	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4919	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4921	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4922	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4926	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4927	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4928	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4929	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4931	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4932	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4936	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4940	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4941	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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COKERS	4943	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	684	DRAIN	04/18/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	688	DRAIN	04/18/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1160	CLEAN-OUT	04/18/2019	04/23/2019	Visual	MISSING CAP	INSTALL CAP
ULC	1161	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1169	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1191	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1192	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1194	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1195	CLEAN-OUT	04/18/2019	04/23/2019	Visual	MISSING CAP	INSTALL SEALANT
ULC	1196	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1200	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1202	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1203	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1207	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4452	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4458	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4460	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4461	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4464	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4467	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4468	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4469	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4471	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1215	DRAIN	04/18/2019	04/18/2019	Visual	DRY	ADD WATER
RDU	4472	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4473	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4475	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4476	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4483	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1218	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4484	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4487	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4488	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1223	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4499	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RDU	4500	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4501	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4502	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1230	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1233	DRAIN	04/18/2019	04/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1263	DRAIN	04/18/2019	04/18/2019	Visual	DRY	ADD WATER
ULC	1267	DRAIN	04/18/2019	04/18/2019	Visual	DRY	ADD WATER
ULC	1282	DRAIN	04/18/2019	04/18/2019	Visual	DRY	ADD WATER
ULC	1288	DRAIN	04/18/2019	04/18/2019	Visual	DRY	ADD WATER
ULC	1292	DRAIN	04/18/2019	04/18/2019	Visual	DRY	ADD WATER
FCCU1	2107	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2108	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2110	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2118	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2120	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2126	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2128	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2129	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2132	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2133	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2140	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2143	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2144	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2147	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2148	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2149	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2150	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2159	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2179	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2181	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2194	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2195	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2197	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2198	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2213A	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	712	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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AU2	713	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	717A	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	718	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	725	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	726	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	729	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	730	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	731	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	732	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	733	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	735	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	736	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	738	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	751	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	753	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	756	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	757	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	758	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	760	DRAIN	04/22/2019	04/22/2019	Visual	CLOGGED	ADD WATER
AU2	764	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	765	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	774	DRAIN	04/22/2019	04/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	776	DRAIN	04/22/2019	04/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	777	DRAIN	04/22/2019	04/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	778	DRAIN	04/22/2019	04/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	779	DRAIN	04/22/2019	04/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	782	DRAIN	04/22/2019	04/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	785	DRAIN	04/22/2019	04/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	786	DRAIN	04/22/2019	04/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	787	DRAIN	04/22/2019	04/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	801	DRAIN	04/22/2019	04/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	706	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	707	DRAIN	04/22/2019	04/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	826	DRAIN	04/22/2019	04/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	827	DRAIN	04/22/2019	04/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1298	DRAIN	04/23/2019	04/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ULC	1299	DRAIN	04/23/2019	04/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1304	DRAIN	04/23/2019	04/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1305	DRAIN	04/23/2019	04/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1310	DRAIN	04/23/2019	04/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1312A	DRAIN	04/23/2019	04/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1313	DRAIN	04/23/2019	04/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1315	DRAIN	04/23/2019	04/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1317	DRAIN	04/23/2019	04/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1320	DRAIN	04/23/2019	04/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1322	DRAIN	04/23/2019	04/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1323	DRAIN	04/23/2019	04/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1324	DRAIN	04/23/2019	04/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1325	DRAIN	04/23/2019	04/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1328	DRAIN	04/23/2019	04/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1331	DRAIN	04/23/2019	04/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1332	DRAIN	04/23/2019	04/24/2019	Visual	CLOGGED	ADD WATER
ULC	1340	DRAIN	04/23/2019	04/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	1945	JCTBOX	04/24/2019	04/25/2019	Visual/M21	COVER PLATE	INSTALL SEALANT
UU3	1945	JCTBOX	04/24/2019	05/01/2019	Visual/M21	COVER PLATE	INSTALL SEALANT
UU3	256	JCTBOX	04/24/2019	04/25/2019	Visual/M21	GASKET	INSTALL SEALANT
UU3	256	JCTBOX	04/24/2019	05/01/2019	Visual/M21	GASKET	INSTALL SEALANT
UU3	297	DRAIN	04/24/2019	05/07/2019	Visual	CLOGGED	ADD WATER
Container	F36419C	Frac Tank	4/25/2019	4/25/2019	M21	MANWAY GASKET TOP OF FRAC TANK LEAKING	TIGHTEN BOLTS
ULC	1368	DRAIN	04/25/2019	04/25/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ULC	1387	DRAIN	04/25/2019	04/25/2019	Visual	DRY	ADD WATER
ULC	1389	DRAIN	04/25/2019	05/08/2019	Visual	CLOGGED	ADD WATER
ULC	1439	DRAIN	04/25/2019	04/25/2019	Visual	DRY	ADD WATER
ULC	1449	DRAIN	04/25/2019	04/25/2019	Visual	DRY	ADD WATER
ULC	1473	DRAIN	04/25/2019	04/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1475	DRAIN	04/25/2019	04/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1532	DRAIN	04/25/2019	05/08/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ULC	1539	DRAIN	04/25/2019	04/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1540	DRAIN	04/25/2019	04/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	901748RA	VENT	04/29/2019	04/29/2019	Visual	TRIPPED	RESET
ENVFAC	901447RH	VENT	04/29/2019	04/29/2019	Visual	TRIPPED	RESET

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BWON Inspection and Monitoring Exceptions
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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	6804AA	VENT	04/30/2019	04/30/2019	Visual	TRIPPED	RESET
RHU	6831AA	VENT	04/30/2019	04/30/2019	Visual	TRIPPED	RESET
RHU	6826AA	VENT	04/30/2019	04/30/2019	Visual	TRIPPED	RESET
CFHU	3461	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3467	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3489	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3490	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3494	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3496	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3498	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3500	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3502	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3503	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3516	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3518	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3519	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	712	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3570	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3571	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3577	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3590	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3591	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3592	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3596	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3603	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3604	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3605	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	713	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3635	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	717A	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3664	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3681	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3701	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	718	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	725	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	726	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
AU2	728	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	729	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	730	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	731	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	732	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	733	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	735	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	736	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	4524C	DRAIN	05/01/2019	05/15/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
AU2	750	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	751	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	753	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	755	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	756	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	757	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	758	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	759	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	763	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	764	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	765	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	767	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	768	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	776	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	777	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	778	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	779	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	785	DRAIN	05/01/2019	05/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	787	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	806	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	808	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	810	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	826	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	827	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	850	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	859	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1706	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1708	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1712	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1714	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1716	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1717	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1718	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1719	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1720	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1721	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1722	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1723	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1724	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1725	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1728	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1732	DRAIN	05/02/2019	05/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RH	VENT	05/06/2019	05/06/2019	Visual	TRIPPED	RESET
COKERS	4352	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4354	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4358	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4359	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4363	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4365	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4370	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4372	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4373	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4377	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4386	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4389	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4394	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4402	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4405	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4406	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4410	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4414	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4415	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4417	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
COKERS	4418	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4419	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4421	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4424	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4425	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	901670R	VENT	05/06/2019	05/06/2019	Visual	TRIPPED	RESET
UU4	26	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	27	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	28	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	29	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	30	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	31	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	32	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	33	DRAIN	05/06/2019	05/07/2019	Visual	CLOGGED	ADD WATER
UU4	34	DRAIN	05/06/2019	05/07/2019	Visual	CLOGGED	ADD WATER
UU4	35	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	36	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	37	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	38	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	39	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	40	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	43	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	44	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	63	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	64	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	65	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	66	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	72A	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	79	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	81	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	82	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	87	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	88	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	89	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	91	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	93	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU4	94	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	101	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	119	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	120	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	139	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	162	DRAIN	05/06/2019	05/07/2019	Visual	DRY	ADD WATER
UU4	173	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	188	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	189	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	190	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	194	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	196	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	204	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	206	DRAIN	05/06/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	206A	DRAIN	05/06/2019	05/07/2019	Visual	DRY	ADD WATER
RHU	6820AA	VENT	05/06/2019	05/06/2019	Visual	TRIPPED	RESET
RHU	6826AA	VENT	05/06/2019	05/06/2019	Visual	TRIPPED	RESET
CFHU	6794AB	VENT	05/06/2019	05/06/2019	Visual	TRIPPED	RESET
COKERS	4429	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4804	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4805	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4806	DRAIN	05/06/2019	05/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4807	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4818	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4819	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4820	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4823	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4829	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4832A	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4848	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4849	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4850	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4909	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4910	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4911	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4912	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
COKERS	4918	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4919	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4921	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4922	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/ OIL	FLUSH W/ WATER
COKERS	4926	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4927	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4928	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4929	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4931	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4932	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4936	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4865A	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3103	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3104	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3120	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3121	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3122	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3126	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3127	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3131	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3134	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3135	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3137	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3138	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3141	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3142	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3171	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3175	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3176	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3177	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3178	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3198	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3214	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3215	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3216	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3217	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3A	3251	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3261	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3262	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3263	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3269	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3270	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3271	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3272	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3273	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3274	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3275	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3276	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3278	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3279	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3280	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3281	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3282	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3287	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	911	JCTBOX	05/07/2019	05/07/2019	Visual/M21	GASKET	INSTALL SEALANT
DDU	932	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	938	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	939	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	948	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	950	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	966	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	970	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	976	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3285	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1000	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1002	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1003	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1005	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1007	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3289	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1008	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1011	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3A	3292	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1013	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1014	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1015	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3299	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1021	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1023	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1024	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1030	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1032	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1033	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3301	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1034	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1035	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1040	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3310	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3313	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	999	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3353	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3356	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070G	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070I	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3364	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3365	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3367	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1077	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1079	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1091	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1093	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1094	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4451	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4452	DRAIN	05/07/2019	05/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2080	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2081	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2090	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2091	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
FCCU3	2430	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2431	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2432	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2434	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2435	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2436	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2437	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2440	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2441	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2442	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2486	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2487	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2513	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2515	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2558	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2561	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2562	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2571	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2572	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2573	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2582	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2603	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2604	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2606	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2614	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2615	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2624	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2631	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2634	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2635	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2636	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2637	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2638	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2641	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2642	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2644	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
FCCU3	2645	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2654	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2672	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1100	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1102	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1103	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1104A	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1107	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1126	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1127	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1129	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2607	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2630	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2639	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2674	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2681	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2682	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2684	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2733	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2736	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2738	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2739	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2740	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2741	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2742	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2744	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2745	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2746	DRAIN	05/08/2019	05/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
Container	RT-250106	Metal Lid	5/9/2019	5/9/2019	M21	LOOSE LID	TIGHTEN LID
RHU	4647	DRAIN	05/09/2019	05/13/2019	Visual	AVO SD/ VISUAL FAIL/ DRY	ADD WATER
UU3	267	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	268	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	288	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	289	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	290	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	299	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU3	300	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	301	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	304	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	305	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	306	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	307	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	308	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	309	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	310	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	312	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	313	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	315	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	316	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	322	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	323	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	325	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	326	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	327	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	328	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	330	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	331	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	332	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	338	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	339	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	340	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	341	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	342	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	344	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	345	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	346	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	347	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	348	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	350	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	351	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	353	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	354	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU3	356	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	357	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	358	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	359	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	324	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4460	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4461	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4464	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4466	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4467	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4471	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4473	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4475	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4476	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4499	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4500	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4501	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4502	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4503	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	417	DRAIN	05/09/2019	05/14/2019	Visual	CLOGGED	ADD WATER
UU3	424	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	426	DRAIN	05/09/2019	05/09/2019	Visual	DRY	ADD WATER
UU3	427	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	428	DRAIN	05/09/2019	05/09/2019	Visual	DRY	ADD WATER
UU3	438	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	441	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	451	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	452	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	453	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	456A	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	458	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	460	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	476	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	503	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	504	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	506	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU3	506B	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	513	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	513A	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	518	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	556	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	558	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	559	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4483	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	571	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	574	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	581	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	583	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	585	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	586	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	588	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	593	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	595	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	600	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	651	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	652	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	655	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	658	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	674	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	675	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	684	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	688	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	689	DRAIN	05/09/2019	05/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2752	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2754	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2755	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2759	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2760	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1651	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1653	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1654	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1655	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1656	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1659	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2799	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2800	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1660	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2802	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2803	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1662	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1664	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1666	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1668	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1669	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1671	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2823	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2828	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2829	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2838	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2841	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2842	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2843	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2845	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2846	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2847	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2849	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1675	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1676	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2850	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2851	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2852	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1680	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2853	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1681	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2854	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2857	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2858	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2859	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2861	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2862	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2863	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1684	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2868	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2869	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2871	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1701	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1703	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2896	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2896A	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2899	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2922	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2923	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1733	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2927	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2928	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1735	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1738	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2940	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2943	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2944	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1740	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1741	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1744	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1745	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1747	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1749	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1765	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1769	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2964	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2965	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2979	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2980	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2984	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2992	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2994	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3019	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3020	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3021	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3022	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025B	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1813	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1814	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1816	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1817	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1818	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1821	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1822	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1823	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1825	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1826	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1827	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1829	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1830	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1831	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1832	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1834	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1836	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1838	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1839	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1841	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1842	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1843	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1845	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1848	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1851	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1852	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1855	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1856	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1857	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1858	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1860	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1861	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1867	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1871	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1872	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1873	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1875	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1876	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1877	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1878	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1879	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1881	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1883	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1884	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1887	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1888	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1889	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1890	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1893	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1894	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1905	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1906	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1916	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1918	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1920	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1937	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1938	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1939	DRAIN	05/13/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	901490RB	VENT	05/13/2019	05/13/2019	Visual	TRIPPED	RESET
ENVFAC	901447RA	VENT	05/13/2019	05/13/2019	Visual	TRIPPED	RESET
ENVFAC	901447RH	VENT	05/13/2019	05/13/2019	Visual	TRIPPED	RESET
RHU	3785	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3802	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3810	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3811	DRAIN	05/13/2019	05/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PWR2	6775	DRAIN	05/14/2019	05/23/2019	Visual	CLOGGED	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ULC	1153	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1155	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1161	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1162	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1164	DRAIN	05/14/2019	05/16/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
ULC	1168	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1169	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1171	DRAIN	05/14/2019	05/14/2019	Visual	DRY	ADD WATER
ULC	1178	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1182	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1191	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1192	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1196	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1200	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1207	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1208	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1212	DRAIN	05/14/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1214	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1215	DRAIN	05/14/2019	05/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1218	DRAIN	05/14/2019	05/20/2019	Visual	FILLED W/OIL	STEAM OUT
ULC	1223	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1226	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1228	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1230	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1233	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5267	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5268	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5270	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5274	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5276	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5286	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5292	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5293	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5316	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5318	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5317	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ULC	1242	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1243	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1245	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1273	DRAIN	05/14/2019	05/14/2019	Visual	DRY	ADD WATER
ULC	1274	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1276	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5367	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5368	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5369	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1278	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5370	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1281	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1283	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5378	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1288	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1296	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1297	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1298	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1299	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1304	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1305	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5404	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1310	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5407	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5408	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1313	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1315	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1324	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1325	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5413	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5414	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6002	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6006	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6007	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6008	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6010	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	6013	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6014	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1322	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1323	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6015	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1331	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6016	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1333	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6017	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1354	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1355	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1357	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1358	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1359A	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6020	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6022	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6023	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6025	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6026	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1374	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1375	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1379	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1380	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1381	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1382	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6075	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1384	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1385	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1392	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6076	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1401	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1408	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1439	DRAIN	05/14/2019	05/14/2019	Visual	DRY	ADD WATER
ULC	1442	DRAIN	05/14/2019	05/14/2019	Visual	DRY	ADD WATER
ULC	1443	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1446	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ULC	1449	DRAIN	05/14/2019	05/14/2019	Visual	DRY	ADD WATER
ULC	1455	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1456	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1465	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1466	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1467	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1471	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1472	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1473	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1474	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1475	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1476B	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1477	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1478	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1481	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1484	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1485	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1488	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1497	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1499	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1501	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1504	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1506	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1510	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1517	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1519	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1520	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1526	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1527	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1537	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1539	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1540	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1541	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1542	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1542B	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1542C	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ULC	1552	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1557A	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1535	DRAIN	05/14/2019	05/16/2019	Visual	CLOGGED	HYDROBLAST
ULC	1579	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1579A	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1580	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1582	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6004	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6005	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6520	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6535	DRAIN	05/14/2019	05/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5006A	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5007	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5008	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5008A	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5023	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5025	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5028	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5029	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5033	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5037	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6552	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6553	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5040	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5048	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5050	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6537	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6542	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6556	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6557	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6560	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6562	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6564	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6610	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6619	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6620	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	6622	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6626	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6622A	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6628	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6631	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4118	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4119	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4121	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4136	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4138	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4150	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4151	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4153	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4155	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4156	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4158	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4166	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4176	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4203	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4213	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4214	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4215	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4216	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4251	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4253	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4268	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5071	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5072	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5074	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5080	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5099	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5100	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5103	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5105	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5113	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5114	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ENVFAC	5123B	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5141	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5142	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5146A	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5153	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4272	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4278	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4279	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4281	DRAIN	05/15/2019	05/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	N24BCB	DRAIN	05/16/2019	05/28/2019	Visual	CLOGGED	VACUUM OUT
RHU	4294	DRAIN	05/20/2019	05/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RH	VENT	05/20/2019	05/20/2019	Visual	TRIPPED	RESET
RHU	4335	DRAIN	05/20/2019	05/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4342	DRAIN	05/20/2019	05/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4343	DRAIN	05/20/2019	05/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4344	DRAIN	05/20/2019	05/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4551A	DRAIN	05/20/2019	05/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4552	DRAIN	05/20/2019	05/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4554	DRAIN	05/20/2019	05/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4556	DRAIN	05/20/2019	05/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6812	VENT	05/20/2019	05/20/2019	Visual	TRIPPED	RESET
RHU	6820AA	VENT	05/20/2019	05/20/2019	Visual	TRIPPED	RESET
RHU	6822AA	VENT	05/20/2019	05/20/2019	Visual	TRIPPED	RESET
RHU	6826AA	VENT	05/20/2019	05/20/2019	Visual	TRIPPED	RESET
RHU	6831AA	VENT	05/20/2019	05/20/2019	Visual	TRIPPED	RESET
RHU	3786	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3812	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3813	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3815	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3817	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3820	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3821	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3822	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3823	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3826	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3832	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	3833	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3837	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3838	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3841	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3842	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3844	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3845	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3869	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3870	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3875	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3878	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3880	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3881	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3883	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3887	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3888	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3889	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3890	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3894	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3900	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3901	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3903	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3915	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3916	DRAIN	05/22/2019	05/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3925	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3926	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3931	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3932	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3936	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3937	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3939	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3941	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3949	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3951	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3952	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3964	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	3965	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3967	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3969	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3972	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3973	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3979	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3980	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3982	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3984	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3986	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3988	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3989	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3991	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3992	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3994	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3995	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4002	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4007	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6847	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6848	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4572	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4574	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4577	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4579	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4618	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4634	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4638	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4649	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4651	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4653	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4658	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4661	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4665	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4673	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4674	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4677	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	4686	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4692	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4694	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4700	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4701	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4704	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4710	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4711	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4717	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4717A	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4720	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4728	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4732	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4734	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4736	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4740	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4743	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4744	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4749	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4779	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4780	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4785	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4786	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4790	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4792	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4794	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5176	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5183	DRAIN	05/23/2019	05/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4587	DRAIN	05/24/2019	05/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4588	DRAIN	05/24/2019	05/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4592	DRAIN	05/24/2019	05/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4595	DRAIN	05/24/2019	05/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4600	DRAIN	05/24/2019	05/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RE	VENT	05/28/2019	05/28/2019	Visual	TRIPPED	RESET
ENVFAC	901447RF	VENT	05/28/2019	05/28/2019	Visual	TRIPPED	RESET
ENVFAC	901447RG	VENT	05/28/2019	05/28/2019	Visual	TRIPPED	RESET

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ENVFAC	901447RH	VENT	05/28/2019	05/28/2019	Visual	TRIPPED	RESET
CFHU	901802RA	VENT	05/28/2019	05/28/2019	Visual	TRIPPED	RESET
Container	ML-25162	Metal Lid	6/3/2019	6/3/2019	M21	FRONT LID LEAKING	TIGHTEN LID
Container	V-250474	Vac Box	6/3/2019	6/3/2019	M21	REAR FLANGE LEAKING	REPLACE GASKET
RHU	3755	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3763	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3765	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3767	DRAIN	06/03/2019	06/03/2019	Visual	DRY	ADD WATER
RHU	3768	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3773	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3781	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3782	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3785	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3786	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3788	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3790	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3794	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3795	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3798	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3799	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3802	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3810	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3811	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3812	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3815	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3817	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3820	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3821	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3822	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3830	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3832	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3833	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3837	DRAIN	06/03/2019	06/06/2019	Visual	CLOGGED	ADD WATER
RHU	3838	DRAIN	06/03/2019	06/06/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
RHU	3841	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3842	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	3844	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3869	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3875	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3878	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3881	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3883	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3888	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3889	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3890	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3894	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3900	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3901	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3903	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3915	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3916	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3925	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3926	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3931	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3932	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3936	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3937	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3939	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3941	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3949	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3951	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3952	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3964	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3965	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3967	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3968	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3969	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3972	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3973	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3979	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3980	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3982	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	3986	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3989	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4002	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RE	VENT	06/03/2019	06/03/2019	Visual	TRIPPED	RESET
ENVFAC	901447RF	VENT	06/03/2019	06/03/2019	Visual	TRIPPED	RESET
ENVFAC	901447RG	VENT	06/03/2019	06/03/2019	Visual	TRIPPED	RESET
ENVFAC	901447RH	VENT	06/03/2019	06/03/2019	Visual	TRIPPED	RESET
RHU	6820AA	VENT	06/03/2019	06/03/2019	Visual	TRIPPED	RESET
RHU	4110	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4111	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4118	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4121	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4136	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4149	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4150	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4151	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4155	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4156	DRAIN	06/03/2019	06/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4203	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4205	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4211	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4213	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4214	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4215	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4216	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4225	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4241	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4245	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4249	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4251	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4253	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4266	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4268	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4272	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4278	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4279	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	4282	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4285	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4289	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4290	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4292	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4331	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4341	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4342	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4343	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4344	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4551A	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4552	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4554	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4562	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4572	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4574	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4577	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4579	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4580	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4587	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4588	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4592	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4595	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4594	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4600	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4608	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4611	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4613	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4614	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4617	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4618	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4627	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4634	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4638	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4641	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4649	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	4651	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4653	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4658	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4661	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	206968R	VENT	06/04/2019	06/04/2019	Visual	TRIPPED	RESET
RHU	4673	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4674	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4677	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4686	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4700	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4701	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4704	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4717	DRAIN	06/04/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4717A	DRAIN	06/04/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4720	DRAIN	06/04/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4726	DRAIN	06/04/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4727	DRAIN	06/04/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4732	DRAIN	06/04/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4734	DRAIN	06/04/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4736	DRAIN	06/04/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4743	DRAIN	06/04/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4744	DRAIN	06/04/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4749	DRAIN	06/04/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	946	DRAIN	06/04/2019	06/04/2019	Visual	DRY	ADD WATER
DDU	948	DRAIN	06/04/2019	06/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5369	DRAIN	06/05/2019	06/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5370	DRAIN	06/05/2019	06/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5402	DRAIN	06/05/2019	06/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5403	DRAIN	06/05/2019	06/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5404	DRAIN	06/05/2019	06/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5407	DRAIN	06/05/2019	06/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5408	DRAIN	06/05/2019	06/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5413	DRAIN	06/05/2019	06/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5414	DRAIN	06/05/2019	06/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1153	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1156	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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ULC	1157	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1168	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1169	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1171	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1172	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1180	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1194	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6520	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6524	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6526	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6535	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6542	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1200	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6552	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6553	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6556	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1202	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6557	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6560	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6562	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6619	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6620	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6622	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1203	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6629	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6635	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1207	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1212	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5267	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5269	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5270	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5274	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5276	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5279	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5284	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5285	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	5286	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5287	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5292	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5293	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5308	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5317	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5318	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5332	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6002	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6004	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6005	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6006	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6010	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6013	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6014	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6015	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6016	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6017	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6020	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6022	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6023	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6024	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6025	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6026	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6027	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6032	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6033	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6064	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6075	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1214	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1215	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1218	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1219	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1223	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1224	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1226	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ULC	1228	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1230	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1233	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1234	DRAIN	06/06/2019	06/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	678	DRAIN	06/07/2019	06/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	901490RB	VENT	06/10/2019	06/10/2019	Visual	TRIPPED	RESET
FCCU3	2080	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2081	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2090	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2091	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2430	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2431	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2432	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2434	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2435	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2436	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2437	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2440	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2441	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2442	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2459	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2461	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2466	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2476	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2486	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2487	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2513	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2515	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2557	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2558	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2559	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2560	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2561	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2562	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2571	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2602	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
FCCU3	2606	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2607	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2614	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2615	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2621	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2624	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2630	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2631	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2634	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2635	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2636	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2637	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2638	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2639	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2647	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2648	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2652	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2654	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2672	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2674	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2679	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2680	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2681	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2682	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2685	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2733	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2736	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2738	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2739	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2740	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2744	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2745	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2746	DRAIN	06/10/2019	06/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	901679RA	VENT	06/11/2019	06/11/2019	Visual	TRIPPED	RESET
RHU	6812	VENT	06/11/2019	06/26/2019	Visual	TRIPPED	RESET
RHU	6820AA	VENT	06/11/2019	06/26/2019	Visual	TRIPPED	RESET

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	6826AA	VENT	06/11/2019	06/26/2019	Visual	TRIPPED	RESET
Container	F36419C	Frac Tank	6/12/2019	6/12/2019	M21	TOP HATCH LEAKING	TIGHTEN BOLTS
RDU	4451	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4452	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4460	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4461	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4462	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4464	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4466	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4467	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4468	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4469	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4471	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4472	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4473	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4475	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4476	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4480	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4483	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4484	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4488	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4499	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4501	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4502	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4503	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4504	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4354	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4405	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4409A	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4409B	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4417	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4418	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4419	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4424	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4425	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4429	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
COKERS	4431	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4804	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4805	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4806	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4807	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4809	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4818	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4819	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4820	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4823	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4824	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4832A	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4842	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4848	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4909	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4910	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4912	DRAIN	06/12/2019	06/12/2019	Visual	DRY	ADD WATER
COKERS	4918	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4921	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4922	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4926	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4927	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4928	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4929	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4931	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4932	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4936	DRAIN	06/12/2019	06/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4941	DRAIN	06/12/2019	06/12/2019	Visual	DRY	ADD WATER
Container	ML-25394	Metal Lid	6/13/2019	6/13/2019	M21	REAR LID LEAKING	TIGHTEN LID
Container	ML-25077	Metal Lid	6/13/2019	6/13/2019	M21	REAR LID LEAKING	TIGHTEN LID
Container	ML-25064	Metal Lid	6/13/2019	6/13/2019	M21	REAR LID LEAKING	TIGHTEN LID
Container	ML-25131	Metal Lid	6/13/2019	6/13/2019	M21	FRONT LID LEAKING	TIGHTEN LID
Container	ML-25182	Metal Lid	6/13/2019	6/13/2019	M21	FRONT & REAR LIDS LEAKING	TIGHTEN LIDS
Container	ML-25286	Metal Lid	6/13/2019	6/13/2019	M21	FRONT LID LEAKING	TIGHTEN LID
PS3A	3101	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3103	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3A	3104	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3120	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3121	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3122	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3126	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3127	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3131	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3134	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3135	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3138	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3141	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3142	DRAIN	06/13/2019	06/17/2019	Visual	DRY	ADD WATER
PS3A	3170	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3171	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3173	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3174	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3175	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3176	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3177	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3178	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3181	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3197	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3198	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3251	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3261	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3262	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3263	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3269	DRAIN	06/13/2019	06/13/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
PS3A	3270	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3271	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3272	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3273	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3275	DRAIN	06/13/2019	06/13/2019	Visual	DRY	ADD WATER
PS3A	3278	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3279	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3280	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3A	3282	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3284	DRAIN	06/13/2019	06/13/2019	Visual	DRY	ADD WATER
PS3A	3286B	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3288	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3289	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3301	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3313	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3319A	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3320	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3321	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3349	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3349A	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3351	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3353	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3356	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3362	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3363	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3364	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3365	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3367	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3371A	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3381	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3383	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3389	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3390	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3409	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3410	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3412	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3414	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3418	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3421	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3422	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3434	DRAIN	06/13/2019	06/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2752	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2755	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2760	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2762	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2798	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2799	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2804	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2805	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	901490RB	VENT	06/17/2019	06/17/2019	Visual	TRIPPED	RESET
PS3B	2823	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2827	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2828	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2831	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2832	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2833	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2838	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2841	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2842	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2843	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2845	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2846	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2847	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2849	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2850	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2851	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2852	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2853	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2854	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2858	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2859	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2861	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2862	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2863	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2866	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2868	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2869	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2891	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2894	DRAIN	06/17/2019	06/17/2019	Visual	DRY	ADD WATER
PS3B	2896	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2896A	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2899	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2923	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2924	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2925	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2926	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2927	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2928	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2929	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2935	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2936	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2937	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2939	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2940	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2952	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2964	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2967	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2974	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2979	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2980	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2965	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2984	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2992	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2994	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3000	DRAIN	06/17/2019	06/17/2019	Visual	CLOGGED	ADD WATER
PS3B	3007	DRAIN	06/17/2019	06/17/2019	Visual	DRY	ADD WATER
PS3B	3019	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3020	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3021	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3022	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025A	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025B	DRAIN	06/17/2019	06/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	6669C	DRAIN	06/17/2019	07/01/2019	Visual	FILLED W/OIL	HYDROBLAST
PS3B	6669D	DRAIN	06/17/2019	07/01/2019	Visual	CLOGGED	HYDROBLAST
COKERS	901679RA	VENT	06/17/2019	06/17/2019	Visual	TRIPPED	RESET
RHU	206041R	VENT	06/17/2019	06/17/2019	Visual	TRIPPED	RESET

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	206051R	VENT	06/17/2019	06/17/2019	Visual	TRIPPED	RESET
CFHU	3461	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3464	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3489	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3490	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3492	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3496	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3498	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3500	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3502	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3516	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3518	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3519	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3524	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3525	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3532	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3494	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3503	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3564	DRAIN	06/18/2019	06/18/2019	Visual	DRY	ADD WATER
CFHU	3570	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3571	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3577	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3580	DRAIN	06/18/2019	06/18/2019	Visual	DRY	ADD WATER
CFHU	3590	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3591	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3592	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3596	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3599	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3603	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3605	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3608	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3616	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3618	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3629	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3635	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3641	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
CFHU	3643	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3655	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3662	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3664	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3666	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3667	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3669	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3671	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3681	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3686	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3687	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
CFHU	3688A	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3689	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3692	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3694	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3697	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3698	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3699	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3701	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3708	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3712	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3657	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
HRU	5219	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
HRU	5225	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
HRU	5229	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
HRU	5254A	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
HRU	5256	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	712	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	718	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	719	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	728	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	729	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	730	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	731	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	732	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	733	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
AU2	735	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	736	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	741	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
AU2	750	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	755	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	706	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	707	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	711	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	757	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	758	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	760	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	761A	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	765	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	764	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	776	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	777	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	778	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	779	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	780	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	826	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	827	DRAIN	06/18/2019	06/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
Container	VDB-25084	Vac Box	6/19/2019	6/19/2019	M21	LOWER LEFT VALVE LEAKING	TIGHTEN VALVE CAP
ARU	1651	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1653	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1654	DRAIN	06/19/2019	06/19/2019	Visual	DRY	ADD WATER
ARU	1655	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1656	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1659	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1660	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1664	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1666	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1668	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1669	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1675	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1676	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1680	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1681	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1703	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1705	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1706	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1708	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1712	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1714	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1716	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1717	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1718	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1719	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1720	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1723	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1724	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1725	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1728	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1733	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1734	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1735	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1738	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1741	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1743	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1744	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1745	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1747	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1749	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1813	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1814	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1816	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1817	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1821	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1822	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1823	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1825	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1826	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1827	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1829	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1830	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1832	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1834	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1836	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1839	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1841	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1842	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1843	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1845	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1846	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1848	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1850	DRAIN	06/19/2019	06/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1851	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1852	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1855	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1856	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1857	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1858	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1860	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1861	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1867	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1870	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1871	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1872	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1873	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1875	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1876	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1877	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1878	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1881	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1883	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1884	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1887	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1889	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1890	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1893	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1894	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1905	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1906	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1918	DRAIN	06/19/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1243	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1263	DRAIN	06/20/2019	06/25/2019	Visual	CLOGGED	ADD WATER
ULC	1264	DRAIN	06/20/2019	06/20/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
ULC	1267	DRAIN	06/20/2019	06/20/2019	Visual	DRY	ADD WATER
ULC	1296	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1297	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1298	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1299	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1304	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1305	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1310	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1312A	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1313	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1315	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1317	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1323	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1324	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1325	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1331	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1340	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1354	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1358	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1359A	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1379	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1387	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1401	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1403	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1442	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1445	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1455	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1456	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ULC	1465	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1466	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1467	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1472	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1473	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1474	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1475	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1476B	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1477	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1478	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1481	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1485	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1487	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1497	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1499	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1500	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1501	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1502	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1504	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1510	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1512	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1516	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1517	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1540	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1541	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1355	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	684	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	688	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	689	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	690	DRAIN	06/20/2019	06/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1367	DRAIN	06/20/2019	07/03/2019	Visual	CLOGGED	ADD WATER
ULC	901490RB	VENT	06/24/2019	06/24/2019	Visual	TRIPPED	RESET
ENVFAC	901447RA	VENT	06/25/2019	06/25/2019	Visual	TRIPPED	RESET
ENVFAC	901447RF	VENT	06/25/2019	06/25/2019	Visual	TRIPPED	RESET
ENVFAC	901447RG	VENT	06/25/2019	06/25/2019	Visual	TRIPPED	RESET
ENVFAC	901447RE	VENT	06/25/2019	06/25/2019	Visual	TRIPPED	RESET

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU3	300	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	301	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	304	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	305	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	306	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	307	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	311	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	315	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	316	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	322	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	323	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	325	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	326	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	327	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	328	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	329	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	331	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	332	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	338	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	339	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	342	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	344	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	348	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	350	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	351	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	353	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	354	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	356	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	357	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	901679RA	VENT	06/25/2019	06/25/2019	Visual	TRIPPED	RESET
UU3	447	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	451	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	514	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	901690R	VENT	06/25/2019	06/25/2019	Visual	TRIPPED	RESET
UU3	571	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	574	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU3	579	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	581	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	595	DRAIN	06/25/2019	06/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	901350R	VENT	06/25/2019	06/25/2019	Visual	TRIPPED	RESET
RHU	206041R	VENT	06/25/2019	06/25/2019	Visual	TRIPPED	RESET
RHU	6816AA	VENT	06/25/2019	06/26/2019	Visual	TRIPPED	RESET
RHU	6822AA	VENT	06/25/2019	06/26/2019	Visual	TRIPPED	RESET
Container	ML-25236	Metal Lid	6/26/2019	6/26/2019	M21	REAR LID LEAKING	TIGHTEN LID
UU4	23	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	26	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	27	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	30	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	31	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	32	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	33	DRAIN	06/26/2019	06/26/2019	Visual	DRY	ADD WATER
UU4	34	DRAIN	06/26/2019	06/26/2019	Visual	DRY	ADD WATER
UU4	35	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	36	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	37	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	38	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	39	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	40	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	42	JCTBOX	06/26/2019	06/26/2019	Visual	MISSING BOLTS	INSTALL SEALANT
UU4	43	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	44	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	63	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	64	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	65	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	68	DRAIN	06/26/2019	07/10/2019	Visual	CLOGGED	ADD WATER
UU4	81	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	82	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	83	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	87	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	88	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	89	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	90	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU4	93	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	94	DRAIN	06/26/2019	06/26/2019	Visual	DRY	ADD WATER
UU4	105	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	104	DRAIN	06/26/2019	06/26/2019	Visual	CLOGGED	ADD WATER
UU4	103	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	119	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	120	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	134	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	138	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	142	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	151	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	152	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	190	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	192	DRAIN	06/26/2019	07/10/2019	Visual	CLOGGED	ADD WATER
UU4	194	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	974	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1000	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1002	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1003	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1005	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1007	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1008	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1011	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1015	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1024	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1032	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1033	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1034	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1035	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1037	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1038	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1064	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070G	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070I	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070K	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070L	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
DDU	1074	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1094	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1100	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1107	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	950	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	966	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	970	DRAIN	06/26/2019	06/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5006	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5006A	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5007	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5008	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5008A	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5017	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5023	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5025	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5026	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5032	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5033	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5039	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5071	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5072	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5074	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5099	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5100	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5105	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5112	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5113	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5114	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5141	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5142	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5146A	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5153	DRAIN	06/27/2019	06/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2104	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2105	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2114	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2118	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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FCCU1	2120	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2126	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2128	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2131	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2132	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2133	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2135	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2136	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2139	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2140	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2143	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2144	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2159	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2113	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2179	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2181	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2197	DRAIN	06/29/2019	06/29/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	901748RA	VENT	07/02/2019	07/02/2019	Visual	TRIPPED	RESET
UU3	901349R	VENT	07/02/2019	07/02/2019	Visual	TRIPPED	RESET
COKERS	901679RA	VENT	07/03/2019	07/03/2019	Visual	TRIPPED	RESET
COKERS	901690R	VENT	07/03/2019	07/03/2019	Visual	TRIPPED	RESET
RHU	901350R	VENT	07/03/2019	07/03/2019	Visual	TRIPPED	RESET
CFHU	6796AB	VENT	07/03/2019	07/03/2019	Visual	TRIPPED	RESET
RHU	3786	DRAIN	07/03/2019	07/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3785	DRAIN	07/03/2019	07/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3772	DRAIN	07/03/2019	07/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3798	DRAIN	07/03/2019	07/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3799	DRAIN	07/03/2019	07/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3802	DRAIN	07/03/2019	07/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3810	DRAIN	07/03/2019	07/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3811	DRAIN	07/03/2019	07/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3812	DRAIN	07/03/2019	07/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3813	DRAIN	07/03/2019	07/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3815	DRAIN	07/03/2019	07/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3817	DRAIN	07/03/2019	07/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3820	DRAIN	07/03/2019	07/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	3821	DRAIN	07/03/2019	07/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3822	DRAIN	07/03/2019	07/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3823	DRAIN	07/03/2019	07/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3826	DRAIN	07/03/2019	07/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3830	DRAIN	07/03/2019	07/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4499	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4500	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4501	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4502	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4503	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4452	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4461	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4464	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4466	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4467	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4468	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4469	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4471	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4472	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4473	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4474	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4475	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4476	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4480	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4483	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4484	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4487	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4488	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RF	VENT	07/08/2019	07/08/2019	Visual	TRIPPED	RESET
ENVFAC	901447RG	VENT	07/08/2019	07/08/2019	Visual	TRIPPED	RESET
ARU	901748RA	VENT	07/08/2019	07/08/2019	Visual	TRIPPED	RESET
UU3	901349R	VENT	07/08/2019	07/08/2019	Visual	TRIPPED	RESET
HRU	5208	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
HRU	5219	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
HRU	5225	DRAIN	07/08/2019	07/08/2019	Visual	DRY	ADD WATER
HRU	5229	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	5367	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5369	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5370	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5376	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5378	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5402	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5404	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5407	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5408	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5409	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5414	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5432	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5434	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5438	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	901679RA	VENT	07/08/2019	07/08/2019	Visual	TRIPPED	RESET
RHU	4245	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4251	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4253	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4268	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4272	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4275	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4278	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4279	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4281	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4285	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4289	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4292	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4341	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4342	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4343	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4552	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4554	DRAIN	07/08/2019	07/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	206041R	VENT	07/08/2019	07/08/2019	Visual	TRIPPED	RESET
RHU	206051R	VENT	07/08/2019	07/08/2019	Visual	TRIPPED	RESET
RHU	4118	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4119	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	4121	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4132	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4133	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4140	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4149	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4150	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4151	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4153	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4155	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4156	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4158	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4211	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4214	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4215	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4216	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4224	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4225	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6520	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6524	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6533	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6552	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6553	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6556	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6557	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6560	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6562	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6564	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6612	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6620	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6622	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6626	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6619	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6628	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6630	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6635	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3753	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	3765	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3832	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3833	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3841	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3842	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3844	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3869	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3870	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3875	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3878	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3879	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3881	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3883	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3888	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3889	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3890	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3894	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3899	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3901	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3903	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3915	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3916	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3926	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3927	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3931	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3936	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3937	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3939	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3941	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3949	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3951	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3952	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3956	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3967	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3969	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3972	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	3932	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3980	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3982	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3986	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3991	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3992	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3995	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4002	DRAIN	07/09/2019	07/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1005	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1032	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1033	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1034	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1035	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1037	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1038	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6847	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6848	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4568	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4572	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4574	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4577	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4579	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4580	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4613	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4614	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4615	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4616	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4619	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4630	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4634	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4638	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4641	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4643	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4650	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4651	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4653	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	4658	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4661	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4671	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4673	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4674	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4677	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4693	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4700	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4701	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4704	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4707	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4710	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4717	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4717A	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4720	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4723	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1094	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4726	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4727	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4732	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4734	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4736	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4739	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4740	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4743	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1100	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4749	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4779	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4780	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4782	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1103	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4782A	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1107	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4790	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4792	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4794	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	4798	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5182	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5183	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	940	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	946	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	948	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	976	DRAIN	07/10/2019	07/25/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
DDU	950	DRAIN	07/10/2019	07/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4587	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4588	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4592	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4595	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4600	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5263	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5266	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5267	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5269	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5270	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5274	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5276	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5282	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5283	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5284	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5285	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5286	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5287	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5292	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5293	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5306	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5308	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5316	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5317	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5318	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5330	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5332	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6002	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	6004	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6005	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6006	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6007	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6010	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6013	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6014	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6015	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6016	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6017	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6020	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6022	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6023	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6024	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6025	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6026	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6032	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6033	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6064	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6071	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6072	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6075	DRAIN	07/11/2019	07/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RA	VENT	07/15/2019	07/15/2019	Visual	TRIPPED	RESET
ENVFAC	901447RG	VENT	07/15/2019	07/15/2019	Visual	TRIPPED	RESET
ENVFAC	901447RH	VENT	07/15/2019	07/15/2019	Visual	TRIPPED	RESET
CFHU	3461	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3467	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3485	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3489	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3490	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3492	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3494	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3496	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3498	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3500	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3502	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
CFHU	3504	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	901748RA	VENT	07/15/2019	07/15/2019	Visual	TRIPPED	RESET
CFHU	3516	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3518	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3519	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	901349R	VENT	07/15/2019	07/15/2019	Visual	TRIPPED	RESET
CFHU	3529	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3533	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3540	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3570	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3571	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3573	DRAIN	07/15/2019	07/15/2019	Visual	DRY	ADD WATER
CFHU	3577	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3590	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3591	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3592	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3596	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3604	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3605	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3614	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3615	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3618	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3629	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3635	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3641	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3655	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3657	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3660	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3664	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3665	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3667	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3669	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3671	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3672	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3675	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3681	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
CFHU	3682	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3684	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3685	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3687	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3689	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3691	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3692	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3694	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3697	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3702	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3705	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3708	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3703	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3710	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3712	DRAIN	07/15/2019	07/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	901679RA	VENT	07/15/2019	07/15/2019	Visual	TRIPPED	RESET
COKERS	901690R	VENT	07/15/2019	07/15/2019	Visual	TRIPPED	RESET
RHU	901350R	VENT	07/15/2019	07/15/2019	Visual	TRIPPED	RESET
RHU	901336R	VENT	07/15/2019	07/15/2019	Visual	TRIPPED	RESET
RHU	206041R	VENT	07/15/2019	07/15/2019	Visual	TRIPPED	RESET
RHU	206051R	VENT	07/15/2019	07/15/2019	Visual	TRIPPED	RESET
RHU	6826AA	VENT	07/15/2019	07/15/2019	Visual	TRIPPED	RESET
PS3A	3103	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3104	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3120	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3121	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3122	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3126	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3127	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3128	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3131	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3134	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3135	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3137	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3138	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3141	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3A	3142	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3169A	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3170	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3171	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3173	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3174	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3175	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3176	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3177	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3178	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3181	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3197	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3198	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3214	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3215	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3216	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3217	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3261	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3263	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3269	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3270	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3271	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3272	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3273	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3275	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3277	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3278	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3279	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3281	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3282	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3285	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	27	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	28	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	30	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	31	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	32	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU4	38	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	39	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	40	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3289	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3291	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3292	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	43	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	44	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	50	DRAIN	07/16/2019	07/31/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
PS3A	3299	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3301	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3309	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3310	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	63	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	64	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	65	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3313	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3316	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3319A	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3319B	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3320	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3321	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3333	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3349	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3349A	DRAIN	07/16/2019	07/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3352	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3353	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3362	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3363	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3364	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3365	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3389	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3390	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3409	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3410	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3411	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3A	3418	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3421	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3423	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3434	DRAIN	07/16/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	79	DRAIN	07/16/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	88	DRAIN	07/16/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	89	DRAIN	07/16/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	90	DRAIN	07/16/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	91	DRAIN	07/16/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	92	DRAIN	07/16/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	93	DRAIN	07/16/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	94	DRAIN	07/16/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	95	DRAIN	07/16/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	96	DRAIN	07/16/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	98	DRAIN	07/16/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2752	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2753	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2754	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2757	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2759	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2760	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2762	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2773	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2777	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2781	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2792	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2797	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2799	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2800	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2802	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2804	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2823	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2828	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2831	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2832	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2833	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2837	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2838	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2841	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2842	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2843	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2845	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2846	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2849	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2850	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2851	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2852	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2853	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2854	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2857	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2858	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2859	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2861	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2862	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2868	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2869	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2871	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2887	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2891	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2892	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2894	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2895	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2896	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2896A	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2899	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2863	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2922	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2923	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2924	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2925	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2926	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2927	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2929	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2937	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2939	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2940	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2944	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2950	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2952	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2963	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2964	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2965	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2974	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2979	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2980	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2981	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2984	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2985	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2992	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2993	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2994	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3019	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3020	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3021	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3022	DRAIN	07/17/2019	07/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
Container	ML-25069	Metal Lid	7/18/2019	7/18/2019	M21	REAR LID LEAKING	TIGHTEN LID HATCHET
COKERS	4352	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4359	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4372	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4405	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4409A	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4417	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4418	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4419	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4801	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4804	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4805	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4806	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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COKERS	4807	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4809	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4818	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4819	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4820	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4823	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4829	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4848	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4850	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4865A	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4909	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4910	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4911	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4912	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4918	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4919	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4922	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4926	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4927	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4928	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4929	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4931	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4932	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4936	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4940	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4941	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4953A	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	6737D	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	189	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	190	DRAIN	07/18/2019	07/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1609	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1651	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1653	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1654	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1655	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1656	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1658	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1659	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1660	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1664	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1666	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1668	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1669	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1670	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1671	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1675	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1676	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1680	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1681	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1703	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1705	DRAIN	07/19/2019	07/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2430	DRAIN	07/19/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2431	DRAIN	07/19/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2432	DRAIN	07/19/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2434	DRAIN	07/19/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1706	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1708	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1710	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1712	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1714	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1715	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1716	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1717	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1718	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1720	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1723	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1724	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1725	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1728	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1733	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1735	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1738	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1740	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1741	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1744	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1745	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1747	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1749	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1813	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1814	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1816	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1817	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1821	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1822	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1823	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1825	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1826	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1827	DRAIN	07/22/2019	07/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1829	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1830	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1832	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1834	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1836	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1839	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1841	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1842	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1843	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1845	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1848	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1851	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1852	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1855	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1856	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1857	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1858	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1860	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1861	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1870	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1871	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1873	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1875	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1876	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1877	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1878	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1881	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1883	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1884	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1887	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1888	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1889	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1890	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1893	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1894	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1905	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1906	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RE	VENT	07/22/2019	07/22/2019	Visual	TRIPPED	RESET
ARU	1918	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RG	VENT	07/22/2019	07/22/2019	Visual	TRIPPED	RESET
ARU	1937	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1938	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1939	DRAIN	07/22/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	901748RA	VENT	07/22/2019	07/22/2019	Visual	TRIPPED	RESET
UU3	901349R	VENT	07/22/2019	07/22/2019	Visual	TRIPPED	RESET
COKERS	901679RA	VENT	07/22/2019	07/22/2019	Visual	TRIPPED	RESET
COKERS	901690R	VENT	07/22/2019	07/22/2019	Visual	TRIPPED	RESET
PS3B	901674RA	VENT	07/22/2019	07/22/2019	Visual	TRIPPED	RESET
RHU	901350R	VENT	07/22/2019	07/22/2019	Visual	TRIPPED	RESET
RHU	901336R	VENT	07/22/2019	07/22/2019	Visual	TRIPPED	RESET
RHU	206041R	VENT	07/22/2019	07/22/2019	Visual	TRIPPED	RESET
FCCU3	2435	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2440	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2442	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2459	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2557	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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FCCU3	2558	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2559	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2560	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2561	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2562	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2571	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2572	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2573	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2584	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	706	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2599A	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	709	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	711	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2601	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2602	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2603	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	712	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	713	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	714	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	717A	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	718	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	719	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	722	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	725	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	726	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	728	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	729	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	730	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	731	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	732	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	733	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	735	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	736	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2614	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2615	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	741	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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AU2	755	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	756	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2621	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	757	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	758	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2624	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	761A	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	764	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	765	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2630	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2631	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	776	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	777	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	778	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	779	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	782	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	785	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	786	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	787	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	826	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	827	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2651	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2652	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2654	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2672	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2679	DRAIN	07/23/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	658	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	674	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	684	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	688	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	689	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	690	DRAIN	07/23/2019	07/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2179	DRAIN	07/24/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2181	DRAIN	07/24/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2194	DRAIN	07/24/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2195	DRAIN	07/24/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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FCCU1	2197	DRAIN	07/24/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2198	DRAIN	07/24/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU1	2213A	DRAIN	07/24/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1153	DRAIN	07/24/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1171	DRAIN	07/24/2019	07/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1155	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1174	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1177	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1182	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1187	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1212	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1214	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1218	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1223	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1224	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1228	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1230	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1233	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1242	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1243	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1263	DRAIN	07/25/2019	07/25/2019	Visual	DRY	ADD WATER
ULC	1267	DRAIN	07/25/2019	07/25/2019	Visual	DRY	ADD WATER
ULC	1273	DRAIN	07/25/2019	07/25/2019	Visual	DRY	ADD WATER
ULC	1281	DRAIN	07/25/2019	07/25/2019	Visual	DRY	ADD WATER
ULC	1296	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1297	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1298	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1299	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1304	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1305	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1310	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1313	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1315	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1317	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1322	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1323	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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ULC	1324	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1325	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1340	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1354	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1355	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1358	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1359A	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1381	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1387	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1389	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1401	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1443	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1446	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1455	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1456	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1465	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1466	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1467	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1472	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1473	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1474	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1475	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1477	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1478	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1485	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1487	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1497	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1499	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1500	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1501	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1502	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1504	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1506	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1510	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1516	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1527	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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ULC	1532	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1533	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1534	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1535	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1539	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1540	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1541	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1579A	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1582	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	N137DMH	JCTBOX	07/25/2019	07/30/2019	Visual	LOOSE SEAL	ADD SEALANT
UU3	267	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	268	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	288	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	289	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	290	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	298	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	299	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	300	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	301	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	304	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	305	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	306	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	307	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	308	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	310	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	311	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	312	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	313	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	315	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	316	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	322	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	323	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	325	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	326	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	328	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	330	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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UU3	331	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	332	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	337	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	338	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	339	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	340	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	341	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	342	DRAIN	07/25/2019	07/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	344	DRAIN	07/25/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	346	DRAIN	07/25/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	347	DRAIN	07/25/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	348	DRAIN	07/25/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	350	DRAIN	07/25/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	351	DRAIN	07/25/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	353	DRAIN	07/25/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	354	DRAIN	07/25/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	356	DRAIN	07/25/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	357	DRAIN	07/25/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	358	DRAIN	07/25/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	359	DRAIN	07/25/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	437	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	444	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	448	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	449	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	451	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	452	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	453	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	460	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	462	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	476	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	478	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	503	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	504	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	506A	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	510	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	513	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU3	513A	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	514	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	517	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	519	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	522	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	556	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	559	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	560	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	535	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	571	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	574	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	579	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	581	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	585	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	586	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	595	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	600	DRAIN	07/26/2019	07/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	N21GCB	DRAIN	07/26/2019	07/29/2019	Visual	DRY	ADD WATER
ENVFAC	901447RA	VENT	07/29/2019	07/29/2019	Visual	TRIPPED	RESET
ENVFAC	901447RE	VENT	07/29/2019	07/29/2019	Visual	TRIPPED	RESET
ENVFAC	901447RF	VENT	07/29/2019	07/29/2019	Visual	TRIPPED	RESET
ENVFAC	901447RG	VENT	07/29/2019	07/29/2019	Visual	TRIPPED	RESET
ARU	901748RA	VENT	07/29/2019	07/29/2019	Visual	TRIPPED	RESET
COKERS	901679RA	VENT	07/31/2019	07/31/2019	Visual	TRIPPED	RESET
RHU	901350R	VENT	07/31/2019	07/31/2019	Visual	TRIPPED	RESET
RHU	901336R	VENT	07/31/2019	07/31/2019	Visual	TRIPPED	RESET
RHU	6826AA	VENT	07/31/2019	07/31/2019	Visual	TRIPPED	RESET
CFHU	6794AB	VENT	07/31/2019	07/31/2019	Visual	TRIPPED	RESET
UU4	21	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	26	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	27	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	28	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	29	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	30	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	31	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	32	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU4	33	DRAIN	08/01/2019	08/01/2019	Visual	DRY	ADD WATER
UU4	34	DRAIN	08/01/2019	08/01/2019	Visual	DRY	ADD WATER
UU4	35	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	36	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	37	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	38	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	39	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	40	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	43	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	44	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	63	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	64	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	65	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	66	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	72	JCTBOX	08/01/2019	08/01/2019	Visual/M21	HATCH	INSTALL SEALANT
UU4	81	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	82	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	87	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	88	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	89	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	90	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	91	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	92	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	93	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	98	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	101	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	103	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	105	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	107	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	119	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	120	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	149A	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	152	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	188	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	189	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	190	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU4	194	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	196	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	204	DRAIN	08/01/2019	08/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	42	JCTBOX	08/01/2019	08/01/2019	M21	GASKET	INSTALL SEALANT
UU4	72	JCTBOX	08/01/2019	08/01/2019	Visual/M21	HATCH	INSTALL SEALANT
DDU	928	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	974	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1000	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1002	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1003	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1005	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1007	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1011	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1013	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1014	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1015	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1034	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1035	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070G	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070I	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RA	VENT	08/05/2019	08/05/2019	Visual	TRIPPED	RESET
ENVFAC	901447RE	VENT	08/05/2019	08/05/2019	Visual	TRIPPED	RESET
ENVFAC	901447RF	VENT	08/05/2019	08/05/2019	Visual	TRIPPED	RESET
ENVFAC	901447RH	VENT	08/05/2019	08/05/2019	Visual	TRIPPED	RESET
DDU	1100	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1102	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1103	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1107	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	999	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	901748RA	VENT	08/05/2019	08/05/2019	Visual	TRIPPED	RESET
COKERS	901679RA	VENT	08/05/2019	08/05/2019	Visual	TRIPPED	RESET
AU2	712	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	713	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	718	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	717A	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	730	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
AU2	731	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	732	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	733	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	735	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	736	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	738	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	776	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	777	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	778	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	779	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	785	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	787	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	826	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	827	DRAIN	08/05/2019	08/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6826AA	VENT	08/05/2019	08/05/2019	Visual	TRIPPED	RESET
Container	FMX8316LC	Frac Tank	8/6/2019	8/8/2019	M21	EAST TOP HATCH LEAKING	TIGHTEN HATCH/ BOLTS
Container	FMX28930C	Frac Tank	8/6/2019	8/15/2019	M21	BOTH TOP HATCHES LEAKING	TIGHTEN BOLTS
RHU	6820AA	VENT	08/06/2019	08/06/2019	Visual	TRIPPED	RESET
ENVFAC	5008A	DRAIN	08/06/2019	08/06/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5026	DRAIN	08/06/2019	08/14/2019	Visual	CLOGGED	HYDROBLAST
ENVFAC	5028	DRAIN	08/06/2019	08/14/2019	Visual	CLOGGED	HYDROBLAST
ULC	1153	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1155	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1162	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1164	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1168	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1171	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1184	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1187	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1191	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1192	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1196	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1200	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1212	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1215	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1218	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ULC	1223	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1228	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1230	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1233	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1242	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1243	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1296	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1297	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1298	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1299	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1304	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1305	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1310	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1313	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1315	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1317	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1323	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1324	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1325	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1344	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1345	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1354	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1355	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1358	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1359A	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1384	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1387	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1389	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1401	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1403	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1443	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1455	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1456	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1465	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1466	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1467	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ULC	1472	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1473	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1474	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1475	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1477	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1478	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1481	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1485	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1487	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1497	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1499	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1500	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1501	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1502	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1504	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1506	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1510	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1513	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1519	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1520	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1532	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1535	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1538	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1539	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1540	DRAIN	08/07/2019	08/07/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
ULC	1542C	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1557A	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	651	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	652	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	654	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	658	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	684	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	688	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	690	DRAIN	08/07/2019	08/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1609	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1651	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1653	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1655	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1656	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1659	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1660	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1663	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1664	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1666	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1668	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1669	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1671	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1676	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1680	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1681	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1703	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1705	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1706	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1708	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1712	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1714	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1716	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1717	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1718	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1720	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1722	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1723	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1724	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1725	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1728	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1733	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1735	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1738	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1740	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1741	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1744	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1745	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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ARU	1747	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1749	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1813	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1814	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1816	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1817	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1821	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1822	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1823	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1825	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1826	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1827	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1829	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1830	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1831	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1832	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1834	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1836	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1838	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1839	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1841	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1842	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1843	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1845	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1848	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1850	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1851	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1852	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1855	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1856	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1857	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1858	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1860	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1861	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1870	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1871	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1873	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1875	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1876	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1877	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1878	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1881	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1883	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1884	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1887	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1888	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1889	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1890	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1893	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1894	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1905	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1906	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1907	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1918	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1937	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1938	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1939	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	268	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	288	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	289	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	290	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	299	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	300	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	301	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	304	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	305	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	306	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	307	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	308	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	309	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	310	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	312	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU3	313	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	315	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	316	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	322	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	323	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	325	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	326	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	327	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	328	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	329	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	330	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	331	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	332	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	338	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	339	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	340	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	341	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	342	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	344	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	346	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	347	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	348	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	350	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	351	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	353	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	354	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	356	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	357	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	358	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	359	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	435	DRAIN	08/08/2019	08/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	444	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	449	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	451	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	452	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	453	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU3	458	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	476	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	478	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	503	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	506A	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	506B	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	513	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	513A	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	518	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	556	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	559	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	560	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	571	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	574	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	581	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	585	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	586	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	588	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	589	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	593	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	595	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2755	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2755A	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2757	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2757A	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2759	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2760	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2799	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2802	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2804	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2823	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3103	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3104	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3120	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3121	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3122	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3A	3126	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3127	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3131	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3134	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3135	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3137	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3138	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3141	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3142	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3169A	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3170	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3171	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3173	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3174	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3175	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3176	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3177	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3178	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3181	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3197	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3214	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3215	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3216	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3217	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3251	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3261	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3263	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3269	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3270	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3271	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3272	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3273	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3274	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3275	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3276	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3277	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3A	3278	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3280	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3281	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3282	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3285	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RA	VENT	08/12/2019	08/12/2019	Visual	TRIPPED	RESET
ENVFAC	901447RE	VENT	08/12/2019	08/12/2019	Visual	TRIPPED	RESET
PS3A	3279	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RF	VENT	08/12/2019	08/12/2019	Visual	TRIPPED	RESET
PS3A	3291	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3292	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3299	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3309	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RG	VENT	08/12/2019	08/12/2019	Visual	TRIPPED	RESET
PS3A	3310	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3316	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3319A	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3321	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3349	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3349A	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3351	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3356	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3362	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3363	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3364	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3365	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3367	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3371A	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3380	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3384	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3389	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3390	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3410	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3411	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3418	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3434	DRAIN	08/12/2019	08/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	901748RA	VENT	08/12/2019	08/12/2019	Visual	TRIPPED	RESET
COKERS	901679RA	VENT	08/13/2019	08/13/2019	Visual	TRIPPED	RESET
COKERS	4354	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2828	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2829	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2838	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2845	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2846	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2847	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2850	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2851	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2852	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2853	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2854	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4405	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4417	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4418	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4419	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4421	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4425	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4805	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	901350R	VENT	08/13/2019	08/13/2019	Visual	TRIPPED	RESET
RHU	901336R	VENT	08/13/2019	08/13/2019	Visual	TRIPPED	RESET
RHU	206041R	VENT	08/13/2019	08/13/2019	Visual	TRIPPED	RESET
RHU	206051R	VENT	08/13/2019	08/13/2019	Visual	TRIPPED	RESET
RHU	6820AA	VENT	08/13/2019	08/13/2019	Visual	TRIPPED	RESET
PS3B	2857	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2858	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2859	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2861	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2862	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4809	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4818	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4819	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4820	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4823	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
COKERS	4824	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	6794AB	VENT	08/13/2019	08/13/2019	Visual	TRIPPED	RESET
COKERS	4825	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4829	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4832A	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4807	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4806	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4843	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4845	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4848	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4849	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4850	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4865A	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3461	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3467	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4909	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4910	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4911	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3489	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4912	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3490	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4918	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4919	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3494	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4921	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3496	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4922	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3498	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3500	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3502	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4926	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4927	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4928	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3504	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4929	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3516	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
COKERS	4931	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4932	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3518	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3519	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4936	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4940	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4941	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3577	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3590	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3591	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3592	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3596	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3603	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3604	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3605	DRAIN	08/13/2019	08/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3570	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3606	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
CFHU	3614	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3615	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3618	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3629	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3635	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3641	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3646	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3655	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3657	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3660	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3664	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3665	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3667	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3669	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3671	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3672	DRAIN	08/14/2019	08/14/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
RDU	4451	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4452	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3675	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RDU	4460	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4461	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3681	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4462	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4464	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4466	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4467	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3684	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4468	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3685	DRAIN	08/14/2019	08/14/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
RDU	4469	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4471	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3687	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
RDU	4472	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4473	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3689	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4474	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4475	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3691	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
CFHU	3692	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
CFHU	3694	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
CFHU	3697	DRAIN	08/14/2019	08/14/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
CFHU	3702	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
CFHU	3703	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3705	DRAIN	08/14/2019	08/14/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
CFHU	3710	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
RDU	4483	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4484	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4499	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4500	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4501	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4502	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4503	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4476	DRAIN	08/14/2019	08/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5367	DRAIN	08/19/2019	08/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5368	DRAIN	08/19/2019	08/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	5369	DRAIN	08/19/2019	08/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5370	DRAIN	08/19/2019	08/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5376	DRAIN	08/19/2019	08/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RG	VENT	08/19/2019	08/19/2019	Visual	TRIPPED	RESET
RHU	5402	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5404	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5407	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5408	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5409	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5413	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5414	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5431	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5432	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RE	VENT	08/19/2019	08/19/2019	Visual	TRIPPED	RESET
ENVFAC	901447RF	VENT	08/19/2019	08/19/2019	Visual	TRIPPED	RESET
RHU	4245	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4251	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4253	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4266	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4268	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4278	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4279	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4281	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4285	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4287	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4289	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4290	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4292	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4294	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4342	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4344	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4556	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4560	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4111	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4118	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4119	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	4121	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4132	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4133	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4150	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4151	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4153	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4155	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4156	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4158	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4164	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4200	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4203	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4207	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4211	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4214	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4215	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4224	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4225	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6520	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6524	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6552	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6553	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6556	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6557	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6560	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6562	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6620	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6622	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6628	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6635	DRAIN	08/19/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	901679RA	VENT	08/19/2019	08/19/2019	Visual	TRIPPED	RESET
COKERS	901690R	VENT	08/19/2019	08/19/2019	Visual	TRIPPED	RESET
RHU	901350R	VENT	08/19/2019	08/19/2019	Visual	TRIPPED	RESET
RHU	901336R	VENT	08/19/2019	08/19/2019	Visual	TRIPPED	RESET
RHU	6822AA	VENT	08/19/2019	08/19/2019	Visual	TRIPPED	RESET
CFHU	6796AB	VENT	08/19/2019	08/19/2019	Visual	TRIPPED	RESET

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ARU	901748RA	VENT	08/20/2019	08/20/2019	Visual	TRIPPED	RESET
RHU	3763	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3765	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3766	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3767	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3776	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3785	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3786	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3794	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3795	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3798	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3802	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3811	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3812	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3813	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3815	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3821	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3822	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3826	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3830	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3832	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3833	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3841	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3842	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3869	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3870	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3875	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3878	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3881	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3888	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3889	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3890	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3894	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3901	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3903	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3915	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	3916	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3925	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3926	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3931	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3932	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3936	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3937	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3939	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3941	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3949	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3951	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3952	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3964	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3965	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3967	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3969	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3972	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3973	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3982	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3983	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3986	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3988	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3989	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3992	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4002	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2430	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2431	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2432	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2434	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2435	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2440	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2441	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2442	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2459	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2557	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2558	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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FCCU3	2559	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2560	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2561	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2562	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2571	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2572	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2573	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2582	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2583	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2584	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2599A	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2601	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2602	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2603	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2604A	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2606	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2607	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2614	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2615	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2621	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2624	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2630	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2631	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2634	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2636	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2637	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2638	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2639	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2641	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2642	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2647	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2652	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2654	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2672	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2679	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6847	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
FCCU3	2680	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6848	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2681	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2682	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2684	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2685	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4572	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4574	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4577	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4579	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4611	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4613	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4615	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4616	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4617	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4618	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2733	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4619	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4649	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4651	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4653	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2736	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2738	DRAIN	08/20/2019	08/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2866	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2867	DRAIN	08/21/2019	08/21/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
PS3B	2868	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2869	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2870	DRAIN	08/21/2019	08/21/2019	Visual	DEBRIS	CLEANED OUT
PS3B	2871	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2875	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2881	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2883	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2487	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2885	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2887	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2890	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2891	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2893	DRAIN	08/21/2019	08/21/2019	Visual	DEBRIS	ADD WATER
PS3B	2894	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2513	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2895	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2896	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2515	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2896A	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2898	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2899	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2900	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2901	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2904	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2486	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2914	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2917	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2918	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2922	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2922A	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2922B	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2923	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2924	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2925	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2926	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2927	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2928	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2929	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2930	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2935	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2648	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2936	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2937	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2939	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2940	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2941	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2942	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2943	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2944	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2945	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2946	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2947	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2949	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2950	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2952	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2953	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2958	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2959	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2960	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2964	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2965	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2967	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2968	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2969	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2970	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2971	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2580	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2973	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2973A	DRAIN	08/21/2019	08/21/2019	Visual	DEBRIS	CLEAN OUT AND ADD WATER
PS3B	2973B	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2975	DRAIN	08/21/2019	08/21/2019	Visual	DEBRIS	CLEAN OUT AND ADD WATER
PS3B	2976	DRAIN	08/21/2019	08/21/2019	Visual	DEBRIS	CLEANED OUT
PS3B	2977	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2978	DRAIN	08/21/2019	08/21/2019	Visual	DEBRIS	CLEANED OUT
PS3B	2979	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2980	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2981	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2982	DRAIN	08/21/2019	08/21/2019	Visual	DEBRIS	CLEANED OUT
PS3B	2984	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2985	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2986	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2990	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2992	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2993	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2996	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2998	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2635	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3001	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3002	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3003	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3004	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3005	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3006	DRAIN	08/21/2019	08/21/2019	Visual	DEBRIS	CLEANED OUT
PS3B	3007	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3012	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3013	DRAIN	08/21/2019	08/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3018	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3019	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3020	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3021	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3022	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4658	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4661	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4671	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4673	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4674	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4677	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4686	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4689	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4692	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4693	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4700	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4701	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4704	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4710	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4711	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4717	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4717A	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4720	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	4726	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4732	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4734	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4736	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4743	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4744	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4749	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4779	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4780	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4785	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4786	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4790	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4792	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4794	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4798	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5176	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5177	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5182	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5183	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4588	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4592	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4594	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4595	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4599	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4600	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5263	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5266	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5267	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5269	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5270	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5274	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5276	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5279	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5283	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5284	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5285	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	5286	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5287	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5292	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5293	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5306	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5308	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5316	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5317	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5318	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5332	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5333	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6002	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6004	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6005	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6006	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6007	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6008	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6010	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6014	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6015	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6016	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6017	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6022	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6023	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6024	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6025	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6026	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6032	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6033	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6059	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6075	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6076	DRAIN	08/22/2019	08/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2739	DRAIN	08/26/2019	08/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2740	DRAIN	08/26/2019	08/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2741	DRAIN	08/26/2019	08/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2744	DRAIN	08/26/2019	08/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
FCCU3	2745	DRAIN	08/26/2019	08/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2746	DRAIN	08/26/2019	08/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2742	DRAIN	08/26/2019	08/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	901490RA	VENT	08/27/2019	08/27/2019	Visual	TRIPPED	RESET
ARU	901748RA	VENT	08/27/2019	08/27/2019	Visual	TRIPPED	RESET
ENVFAC	901447RE	VENT	08/27/2019	08/27/2019	Visual	TRIPPED	RESET
ENVFAC	901447RF	VENT	08/27/2019	08/27/2019	Visual	TRIPPED	RESET
COKERS	901679RA	VENT	08/27/2019	08/27/2019	Visual	TRIPPED	RESET
PS3B	901670R	VENT	08/27/2019	08/27/2019	Visual	TRIPPED	RESET
RHU	901350R	VENT	08/27/2019	08/27/2019	Visual	TRIPPED	RESET
RHU	901336R	VENT	08/27/2019	08/27/2019	Visual	TRIPPED	RESET
Container	ML-25215	Metal Lid	8/28/2019	8/28/2019	M21	FRONT LID GASKET LEAKING	TIGHTEN LID
Container	ML-25055	Metal Lid	8/28/2019	8/28/2019	M21	REAR LID LEAKING	TIGHTEN LID
PWR2	6771	TANK	08/28/2019	08/30/2019	M21	PVRV-WEEP HOLE LEAKING	ISOLATED
UU4	155	CLEAN-OUT	08/30/2019	08/30/2019	Visual	CAP MISSING	INSTALL CAP
Container	ML -25401	Metal Lid	9/3/2019	9/3/2019	M21	REAR LID LEAKING	TIGHTEN LID
Container	ML-25405	Metal Lid	9/3/2019	9/3/2019	M21	FRONT & REAR LIDS LEAKING	TIGHTEN LIDS
RHU	5361	DRAIN	09/03/2019	09/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5367	DRAIN	09/03/2019	09/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5368	DRAIN	09/03/2019	09/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5369	DRAIN	09/03/2019	09/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5370	DRAIN	09/03/2019	09/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5376	DRAIN	09/03/2019	09/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5378	DRAIN	09/03/2019	09/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RF	VENT	09/03/2019	09/03/2019	Visual	TRIPPED	RESET
ENVFAC	901447RG	VENT	09/03/2019	09/03/2019	Visual	TRIPPED	RESET
RHU	5402	DRAIN	09/03/2019	09/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5404	DRAIN	09/03/2019	09/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5407	DRAIN	09/03/2019	09/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5408	DRAIN	09/03/2019	09/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5413	DRAIN	09/03/2019	09/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5414	DRAIN	09/03/2019	09/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5428	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5431	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4245	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4251	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	4253	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4264	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4268	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4272	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4275	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4278	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4279	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4281	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4285	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4289	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4290	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4292	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4294	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4333	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
RHU	4335	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4337	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4340	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4341	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4342	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4344	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4552	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4554	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4556	DRAIN	09/03/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	901748RA	VENT	09/03/2019	09/03/2019	Visual	TRIPPED	RESET
COKERS	901679RA	VENT	09/03/2019	09/03/2019	Visual	TRIPPED	RESET
PS3B	901674R	VENT	09/03/2019	09/03/2019	Visual	TRIPPED	RESET
RHU	901350R	VENT	09/03/2019	09/03/2019	Visual	TRIPPED	RESET
RHU	901336R	VENT	09/03/2019	09/03/2019	Visual	TRIPPED	RESET
RHU	206041R	VENT	09/03/2019	09/03/2019	Visual	TRIPPED	RESET
RHU	6812	VENT	09/03/2019	09/03/2019	Visual	TRIPPED	RESET
RHU	6820AA	VENT	09/03/2019	09/03/2019	Visual	TRIPPED	RESET
RHU	6822AA	VENT	09/03/2019	09/03/2019	Visual	TRIPPED	RESET
RHU	6826AA	VENT	09/03/2019	09/03/2019	Visual	TRIPPED	RESET
RHU	6831AA	VENT	09/03/2019	09/03/2019	Visual	TRIPPED	RESET
AU2	712	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	713	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
AU2	725	DRAIN	09/04/2019	09/04/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
AU2	726	DRAIN	09/04/2019	09/04/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
AU2	728	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	729	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	730	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	731	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	732	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	733	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	735	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	736	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	746	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	754	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	755	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	756	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	757	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	758	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	760	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	761A	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	763	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	764	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	765	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	767	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	776	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	777	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	778	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	779	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	784	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	785	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	787	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	826	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	827	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	854	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	654	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4110	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4112	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4114	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
NDU	655	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4118	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4119	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	658	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4121	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	675	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4135	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4138	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4143	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	684	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	688	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	689	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	690	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4149	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4150	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4151	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4153	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4155	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4156	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4158	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4201	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4203	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4207	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4211	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4214	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4215	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4216	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4222	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4224	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4225	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6520	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6524	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6542	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6552	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6553	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6556	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	6557	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6560	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6562	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	912	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	916	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	917	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	919	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	920	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	920A	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	928	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6617	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6620	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6622	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6622A	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6628	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6635	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1000	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1002	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1003	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1005	DRAIN	09/04/2019	09/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1007	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1011	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1013	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3763	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3765	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3766	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3767	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3768	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3774	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3781	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3785	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3786	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3794	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3795	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3798	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3799	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	3802	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3810	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3811	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3812	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3815	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3817	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3820	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3821	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3822	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3832	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3833	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3841	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3842	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1032	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1033	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1034	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1035	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1037	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1038	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3870	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070G	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070I	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3875	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3878	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3881	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3883	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3888	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3889	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3890	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3894	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3901	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3903	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3915	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3916	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1100	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1102	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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DDU	1103	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1107	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3925	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3926	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3931	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3932	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3936	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3937	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3941	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	999	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3949	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3951	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3952	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3961	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3964	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3965	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3967	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3969	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3972	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3973	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3979	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3980	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3982	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3995	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4002	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	26	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	27	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	28	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	29	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	30	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	31	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	32	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	35	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	36	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	37	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	38	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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UU4	39	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	40	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	43	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	44	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	63	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	64	DRAIN	09/06/2019	09/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RF	VENT	09/09/2019	09/09/2019	Visual	TRIPPED	RESET
ENVFAC	901447RG	VENT	09/09/2019	09/09/2019	Visual	TRIPPED	RESET
RHU	6847	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4572	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4574	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4577	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4579	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4580	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4611	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4613	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4614	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4616	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4617	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4618	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4634	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4638	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4641	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4643	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4649	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4651	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4653	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4654	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4658	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4661	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4663	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4671	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4673	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4674	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4677	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4686	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	4690	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4692	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4693	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4700	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4701	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4704	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4717	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4717A	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4720	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4727	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4732	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4734	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4736	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4743	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4744	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4749	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4779	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4780	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4790	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4792	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4794	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5182	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5183	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4587	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4588	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4592	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4595	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4600	DRAIN	09/09/2019	09/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6002	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6004	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6005	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6006	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6007	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6010	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6013	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6014	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	6017	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6020	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6022	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6023	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6024	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6025	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6026	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	901349R	VENT	09/09/2019	09/09/2019	Visual	TRIPPED	RESET
RHU	6027	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6032	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6033	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6059	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6066	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6071	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6072	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6075	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5263	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5266	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5267	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5269	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5270	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5274	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5276	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5279	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5284	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5285	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5286	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5287	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5292	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5293	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5306	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5308	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5316	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5317	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5318	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5330	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	5332	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5333	DRAIN	09/09/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4951	CLEAN-OUT	09/09/2019	09/12/2019	Visual	COVER PLATE BROKEN	RECAP
COKERS	901679RA	VENT	09/09/2019	09/09/2019	Visual	TRIPPED	RESET
PS3B	901674RA	VENT	09/09/2019	09/09/2019	Visual	TRIPPED	RESET
RHU	901336R	VENT	09/09/2019	09/09/2019	Visual	TRIPPED	RESET
RHU	6812	VENT	09/09/2019	09/09/2019	Visual	TRIPPED	RESET
UU4	21	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	65	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	66	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	81	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	82	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	87	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	88	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	89	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	90	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	91	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	92	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	93	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	98	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	101	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	119	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	120	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	134	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	188	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	189	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	190	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	194	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	196	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	204	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1609	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1651	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1653	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1655	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1656	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1659	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1660	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1663	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1664	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1666	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1667	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1668	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1669	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1671	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1675	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1676	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1680	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1681	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1703	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1705	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1706	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1708	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1712	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1714	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1716	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1717	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1718	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1720	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1723	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1724	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1725	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1728	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
HRU	5208	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1733	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1735	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1738	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1740	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1741	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
HRU	5225	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1744	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1745	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1747	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1749	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
HRU	5254A	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3458	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3459	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3461	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1813	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1814	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1816	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1817	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1821	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1822	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1823	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1825	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1826	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1827	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1829	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3485	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3489	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3490	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3492	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3498	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3500	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3502	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3516	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3518	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3519	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3522	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3532	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3536	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3570	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3571	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3577	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3590	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3591	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3592	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3596	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
CFHU	3603	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3604	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3605	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3614	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3616	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3618	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3629	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3635	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3641	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3643	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3655	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3657	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3660	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3664	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3666	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3667	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3669	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3672	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3675	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3679	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3684	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3685	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3689	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3694	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3698	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3699	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3705	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3708	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3710	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1939	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1830	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1831	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1832	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1834	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1836	DRAIN	09/10/2019	09/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	2017	JCTBOX	09/11/2019	09/18/2019	Visual	AVO / VISUAL FAIL/ LID	INSTALLED SEALANT/RESEAL

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1688	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1839	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1841	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1842	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1843	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1845	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1848	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1850	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1851	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1852	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1855	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1856	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1857	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1858	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1860	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1861	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1870	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1871	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1872	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1873	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1875	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1876	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1877	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1878	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1881	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1883	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1884	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1887	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1888	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1889	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1890	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1893	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1894	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1905	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1906	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1918	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
FCCU3	2080	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2081	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2090	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2091	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2430	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2431	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2432	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2434	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2435	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2436	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2437	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2440	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2441	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2442	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2450	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2459	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2470	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2476	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2481	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2486	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2487	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2513	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2515	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2557	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2558	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2560	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2561	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2562	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2571	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2572	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2602	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2604A	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2606	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2614	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2615	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2621	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
FCCU3	2624	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2625	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2630	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2631	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2634	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2635	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2636	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2637	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2638	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2639	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2641	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2642	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2645	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2647	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2648	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2654	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2672	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2680	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2682	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2684	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2685	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2733	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2736	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2738	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2739	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2740	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2741	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2742	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2681	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2744	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2745	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2746	DRAIN	09/11/2019	09/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4451	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4452	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4460	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4461	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RDU	4462	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4464	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4465	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4466	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4467	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4468	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4469	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4471	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4472	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4473	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4474	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4475	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4476	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4483	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4484	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4485	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4487	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4488	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4499	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4500	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4501	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4502	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4503	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4504	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4405	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4409A	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4415	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4417	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4418	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4419	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4421	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4424	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4425	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4429	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4430	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4801	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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COKERS	4804	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4805	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4806	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4807	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4809	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4819	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4820	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4829	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4832A	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4849	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4850	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4868	CLEAN-OUT	09/12/2019	09/12/2019	Visual	MISSING CAP	replaced cap
COKERS	4909	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4910	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4911	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4912	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4918	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4921	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4922	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4925	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4926	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4927	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4928	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4929	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4931	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4932	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4936	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4940	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4941	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4953A	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	6925D	DRAIN	09/12/2019	09/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3101	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3103	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3104	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3105	DRAIN	09/16/2019	09/16/2019	Visual	DRY	ADD WATER
PS3A	3120	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3A	3121	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3122	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3126	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3127	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3131	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3133	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3134	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3135	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3137	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3139	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3142	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3146	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3171	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3175	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3176	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3177	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3178	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RE	VENT	09/16/2019	09/16/2019	Visual	TRIPPED	RESET
PS3A	3181	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3197	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3214	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3215	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3216	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3217	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	901748RA	VENT	09/16/2019	09/16/2019	Visual	TRIPPED	RESET
PS3A	3227	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	901679RA	VENT	09/16/2019	09/16/2019	Visual	TRIPPED	RESET
PS3A	3251	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3261	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3262	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3263	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3266	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3269	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3270	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3271	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3272	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3A	3273	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3274	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3275	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3276	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3277	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3278	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3279	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3280	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3281	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3282	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3283	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3284	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	901336R	VENT	09/16/2019	09/16/2019	Visual	TRIPPED	RESET
PS3A	3285	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3287	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3288	DRAIN	09/16/2019	09/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	900748R	VENT	09/19/2019	09/19/2019	Visual	TRIPPED	RESET
CFHU	900741R	VENT	09/19/2019	09/19/2019	Visual	TRIPPED	RESET
CFHU	206099R	VENT	09/19/2019	09/19/2019	Visual	TRIPPED	RESET
CFHU	901487R	VENT	09/19/2019	09/19/2019	Visual	TRIPPED	RESET
CFHU	6794AB	VENT	09/19/2019	09/19/2019	Visual	TRIPPED	RESET
CFHU	901802RA	VENT	09/19/2019	09/19/2019	Visual	TRIPPED	RESET
PS3A	3291	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3292	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3309	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3310	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3316	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3319B	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3320	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3321	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3349	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3351	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3353	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3356	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3365	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3367	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3A	3406	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3409	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3410	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3411	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3418	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3421	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3434	DRAIN	09/20/2019	09/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2752	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2753	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2754	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2755A	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2759	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2760	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2785	DRAIN	09/21/2019	10/04/2019	Visual	CLOGGED	ADD WATER
PS3B	2998	DRAIN	09/21/2019	10/05/2019	Visual	CLOGGED	FLUSHED/VAC
PS3B	2790	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2799	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2800	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2802	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2804	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2823	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2828	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2829	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2831	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2832	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2833	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2837	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2838	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2841	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2842	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2843	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2845	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2846	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2847	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2849	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2850	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2851	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2852	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2853	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2854	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2857	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2858	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2859	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2861	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2862	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2863	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2867	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2869	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2871	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2887	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2891	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2892	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2894	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2895	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2896A	DRAIN	09/21/2019	09/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3031	DRAIN	09/21/2019	10/05/2019	Visual	CLOGGED	FLUSHED/ VAC
PS3B	2923	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2924	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2925	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2926	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2927	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2928	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2929	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2935	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2936	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2940	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2950	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2952	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2958	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2959	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2973A	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2973B	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2978	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2979	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2980	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2981	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2982	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2984	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2985	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2992	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2993	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2994	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3019	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3020	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3021	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3022	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025A	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025B	DRAIN	09/22/2019	09/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
Container	ML-25095	Metal Lid	9/23/2019	9/23/2019	M21	MIDDLE SECTION LIDS LEAKING	TIGHTEN LIDS TOGETHER
Container	ML-25153	Metal Lid	9/23/2019	9/23/2019	M21	RIGHT SIDE REAR LID LEAKING	TIGHTEN LID
COKERS	901679RA	VENT	09/23/2019	09/23/2019	Visual	TRIPPED	RESET
ENVFAC	901447RE	VENT	09/23/2019	09/23/2019	Visual	TRIPPED	RESET
ENVFAC	901447RF	VENT	09/23/2019	09/23/2019	Visual	TRIPPED	RESET
UU3	901349R	VENT	09/23/2019	09/23/2019	Visual	TRIPPED	RESET
ULC	1155	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1169	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1171	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1177	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1178	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1184	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1187	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1191	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1196	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1200	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1207	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1212	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1215	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1218	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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ULC	1224	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1228	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1230	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1233	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1242	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1243	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1296	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1297	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1298	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1299	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1304	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1305	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1310	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1313	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1315	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1317	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1323	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1324	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1325	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1354	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1355	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1387	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1389	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1343	DRAIN	09/23/2019	10/07/2019	Visual	CLOGGED	CLEANED OUT
ULC	1455	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1456	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1466	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1467	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1472	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1473	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1475	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1477	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1478	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1481	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1485	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1487	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ULC	1506	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1532	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1533	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1538	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1540	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1541	DRAIN	09/23/2019	09/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	901336R	VENT	09/23/2019	09/23/2019	Visual	TRIPPED	RESET
ENVFAC	5006A	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5007	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5008	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5008A	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5010	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5023	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5025	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5026	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5028	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5029	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5040	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5079	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5100	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5112	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	268	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	288	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	289	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	290	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	299	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	300	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	301	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	304	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	305	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	306	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	307	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	308	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	309	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	310	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	312	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU3	313	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	315	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	316	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	322	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	323	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	325	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	326	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	327	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	328	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	330	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	331	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	332	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	338	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	339	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	340	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	341	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	342	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	344	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	346	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	347	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	348	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	350	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	351	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	353	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	354	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	356	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	357	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	358	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	359	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	444	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	451	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	452	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	453	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	478	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	513	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	513A	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU3	514	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	535	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	559	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	560	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	565	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	581	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	585	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	586	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	588	DRAIN	09/24/2019	09/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RE	VENT	09/30/2019	09/30/2019	Visual	TRIPPED	RESET
ENVFAC	901447RH	VENT	09/30/2019	09/30/2019	Visual	TRIPPED	RESET
ARU	901748RA	VENT	09/30/2019	09/30/2019	Visual	TRIPPED	RESET
COKERS	901679RA	VENT	09/30/2019	09/30/2019	Visual	TRIPPED	RESET
RHU	6819AA	VENT	09/30/2019	09/30/2019	Visual	TRIPPED	RESET
RHU	5444	CLEAN-OUT	10/01/2019	10/02/2019	Visual/M21	M21 MISSING COVER	ADD COVER/WATER
CFHU	3458	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3459	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3461	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3489	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3490	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3494	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3496	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3498	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3500	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3502	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3516	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3518	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3519	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3571	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3590	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3591	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3592	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3596	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3603	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3604	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3605	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
CFHU	3614	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3618	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3629	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3635	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3643	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1638	JCTBOX	10/01/2019	10/01/2019	Visual/M21	GASKET	INSTALL SEALANT
ARU	1609	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1651	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1655	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3655	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1656	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1657	DRAIN	10/01/2019	10/01/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
CFHU	3657	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1660	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3660	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1665	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1668	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1669	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1671	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1675	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1676	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3664	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1677	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1678	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3666	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3667	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3669	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1703	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1705	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3672	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3675	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1687	DRAIN	10/01/2019	10/01/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
CFHU	3679	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3684	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3685	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3689	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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CFHU	3694	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1659	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1664	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3698	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3699	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1706	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1708	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1712	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1714	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3705	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3708	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1715	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1716	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1717	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1718	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1719	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1720	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3710	DRAIN	10/01/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1723	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1724	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1725	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1728	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1733	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1735	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1738	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1740	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1741	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1743	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1744	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1745	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1746	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1747	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1749	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1768	JCTBOX	10/01/2019	10/01/2019	Visual	MISSING BOLTS	INSTALL SEALANT
ARU	1770	JCTBOX	10/01/2019	10/01/2019	Visual/M21	GASKET	INSTALL SEALANT
ARU	1813	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1814	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1816	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1817	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1821	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1822	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1823	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1825	DRAIN	10/01/2019	10/01/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1826	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1827	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1828	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ARU	1829	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1830	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1831	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1832	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1834	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1836	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1838	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ARU	1839	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1841	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1842	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1843	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1845	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1846	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1847	DRAIN	10/02/2019	10/02/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
ARU	1848	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1850	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1851	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1852	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1853	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ARU	1855	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1856	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1857	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1858	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1859	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ARU	1860	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1861	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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ARU	1863	DRAIN	10/02/2019	10/02/2019	Visual	DRY	ADD WATER
ARU	1864	DRAIN	10/02/2019	10/02/2019	Visual	DRY	ADD WATER
ARU	1865	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ARU	1866	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1867	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1871	DRAIN	10/02/2019	10/02/2019	Visual	DRY	ADD WATER
ARU	1872	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1873	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1874	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ARU	1875	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1876	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1877	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1878	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1879	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1881	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1882	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ARU	1883	DRAIN	10/02/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1885	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ARU	1887	DRAIN	10/02/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1889	DRAIN	10/02/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1890	DRAIN	10/02/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1891	DRAIN	10/02/2019	10/02/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ARU	1894	DRAIN	10/02/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1897	DRAIN	10/02/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5444	CLEAN-OUT	10/02/2019	10/07/2019	Visual/M21	MISSING COVER	ADD COVER
ARU	1912	DRAIN	10/02/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1947	JCTBOX	10/02/2019	10/02/2019	Visual/M21	HATCH	INSTALL SEALANT
ARU	1948	JCTBOX	10/02/2019	10/03/2019	Visual/M21	HATCH	INSTALL SEALANT
ARU	1933	OWSEP	10/03/2019	10/03/2019	Visual/M21	HATCH	INSTALL SEALANT
ARU	1935	JCTBOX	10/03/2019	10/03/2019	Visual/M21	HATCH	INSTALL SEALANT
ARU	1936	JCTBOX	10/03/2019	10/03/2019	Visual/M21	HATCH	INSTALL SEALANT
ARU	1939	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ARU	1949	JCTBOX	10/03/2019	10/03/2019	Visual/M21	COVER PLATE	INSTALL SEALANT
ARU	1949	JCTBOX	10/03/2019	10/03/2019	Visual/M21	COVER PLATE	INSTALL SEALANT
HRU	5225	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1950	JCTBOX	10/03/2019	10/03/2019	Visual/M21	COVER PLATE	INSTALL SEALANT

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RHU	5367	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5368	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5369	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5370	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5376	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5378	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5402	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5404	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5407	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5408	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5413	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5414	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4245	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4251	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4253	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4268	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4272	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4278	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4279	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4281	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4285	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4289	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4290	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4292	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4294	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4342	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4344	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4552	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4554	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4556	DRAIN	10/03/2019	10/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2751A	DRAIN	10/04/2019	10/04/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2755A	DRAIN	10/04/2019	10/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2756	DRAIN	10/04/2019	10/07/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2757	DRAIN	10/04/2019	10/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2767	DRAIN	10/04/2019	10/07/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2771	DRAIN	10/04/2019	10/07/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2774	DRAIN	10/04/2019	10/07/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2775	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2776	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2778	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2781	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2788	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2791	DRAIN	10/04/2019	10/04/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2792	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2794	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2795	DRAIN	10/04/2019	10/04/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2799	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2803	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2804	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2805	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2809	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2810	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2811	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2824	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2825	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2831	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2832	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2833	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2841	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2842	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2843	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2845	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2846	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2847	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2850	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2851	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2853	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2854	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2855	DRAIN	10/04/2019	10/04/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2868	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2869	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2877	DRAIN	10/04/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
Container	V-250327	Vac Box	10/7/2019	10/7/2019	M21	DOME LID LEAKING	TIGHTEN LID
Container	FMX2318LC	Frac Tank	10/7/2019	10/7/2019	M21	NORTH & SOUTH TOP HATCH BOTH LEAKING	TIGHTEN HATCHES
ENVFAC	901447RE	VENT	10/07/2019	10/07/2019	Visual	TRIPPED	RESET
ENVFAC	901447RF	VENT	10/07/2019	10/07/2019	Visual	TRIPPED	RESET
ENVFAC	901447RH	VENT	10/07/2019	10/07/2019	Visual	TRIPPED	RESET
UU3	901349R	VENT	10/07/2019	10/07/2019	Visual	TRIPPED	RESET
COKERS	901679RA	VENT	10/07/2019	10/07/2019	Visual	TRIPPED	RESET
PS3B	901674RA	VENT	10/07/2019	10/07/2019	Visual	TRIPPED	RESET
AU2	706	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	709	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	711	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	712	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	713	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	726	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	729	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	730	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	731	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	732	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	733	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	735	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	736	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	741	DRAIN	10/08/2019	10/16/2019	Visual	CLOGGED	REPLACED CAP
AU2	744	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	746	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	750	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	754	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	755	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	756	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	757	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	758	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	760	DRAIN	10/08/2019	10/16/2019	Visual	CLOGGED	HYDROBLAST
AU2	763	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	764	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	765	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	767	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
AU2	768	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	771	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	774	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	776	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	777	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	778	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	779	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	780	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	782	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	785	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	786	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	787	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	795	DRAIN	10/08/2019	10/16/2019	Visual	CLOGGED	CLEANED OUT
AU2	826	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	827	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	859D	DRAIN	10/08/2019	10/16/2019	Visual	FILLED W/DIRT/DEBRIS	CAPPED
PS3B	2884	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2887	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2890	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2892	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2894	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2895	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2896	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	900749R	VENT	10/08/2019	10/08/2019	Visual	TRIPPED	RESET
CFHU	900746R	VENT	10/08/2019	10/08/2019	Visual	TRIPPED	RESET
CFHU	900740R	VENT	10/08/2019	10/08/2019	Visual	TRIPPED	RESET
CFHU	900742R	VENT	10/08/2019	10/08/2019	Visual	TRIPPED	RESET
CFHU	900743R	VENT	10/08/2019	10/08/2019	Visual	TRIPPED	RESET
CFHU	900741R	VENT	10/08/2019	10/08/2019	Visual	TRIPPED	RESET
CFHU	901485R	VENT	10/08/2019	10/08/2019	Visual	TRIPPED	RESET
CFHU	206903R	VENT	10/08/2019	10/08/2019	Visual	TRIPPED	RESET
CFHU	206098R	VENT	10/08/2019	10/08/2019	Visual	TRIPPED	RESET
CFHU	206096R	VENT	10/08/2019	10/08/2019	Visual	TRIPPED	RESET
CFHU	206083R	VENT	10/08/2019	10/08/2019	Visual	TRIPPED	RESET
CFHU	901489R	VENT	10/08/2019	10/08/2019	Visual	TRIPPED	RESET
NDU	651	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
NDU	654	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	655	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	677	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	684	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	690	DRAIN	10/08/2019	10/08/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	6796AB	VENT	10/09/2019	10/09/2019	Visual	TRIPPED	RESET
RHU	4275	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4333	DRAIN	10/09/2019	10/09/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
ULC	1157	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4340	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1162	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1164	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4341	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1168	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1178	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1182	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4112	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1191	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1194	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4118	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1195	CLEAN-OUT	10/09/2019	10/09/2019	Visual	MISSING CAP	installed sealant
ULC	1196	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4119	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4121	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	900692R	VENT	10/09/2019	10/09/2019	Visual	TRIPPED	RESET
RHU	4143	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1200	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1202	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4149	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1203	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	900767R	VENT	10/09/2019	10/09/2019	Visual	TRIPPED	RESET
RHU	4150	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1212	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1214	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4151	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1215	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	4153	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4155	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4156	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4158	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1226	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ULC	1228	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1230	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1233	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4188	DRAIN	10/09/2019	10/09/2019	Visual	CLOGGED	ADD WATER
RHU	900752R	VENT	10/09/2019	10/09/2019	Visual	TRIPPED	RESET
RHU	4211	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4214	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4215	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4216	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4222	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4224	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4225	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	901722R	VENT	10/09/2019	10/09/2019	Visual	TRIPPED	RESET
RHU	901107R	VENT	10/09/2019	10/09/2019	Visual	TRIPPED	RESET
RHU	901166R	VENT	10/09/2019	10/14/2019	Visual	TRIPPED	RESET
RHU	206044R	VENT	10/09/2019	10/09/2019	Visual	TRIPPED	RESET
RHU	6520	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6524	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6542	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6552	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6553	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6556	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6557	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6560	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6562	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	901698R	VENT	10/09/2019	10/09/2019	Visual	TRIPPED	RESET
RHU	6617	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6620	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6622	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6622A	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6628	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	6635	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1243	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1263	DRAIN	10/09/2019	10/17/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
ULC	1264	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1267	DRAIN	10/09/2019	10/17/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
ULC	1270	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1272	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1273	DRAIN	10/09/2019	10/17/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
ULC	1276	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3785	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1283	DRAIN	10/09/2019	10/09/2019	Visual	DRY	ADD WATER
ULC	1285	DRAIN	10/09/2019	10/17/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
ULC	1292	DRAIN	10/09/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1291	DRAIN	10/09/2019	10/17/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
ULC	1296	DRAIN	10/09/2019	10/17/2019	Visual	DRY	ADD WATER
RHU	3794	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1298	DRAIN	10/09/2019	10/17/2019	Visual	CLOGGED	HYDROBLAST
ULC	1299	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1303	DRAIN	10/09/2019	10/09/2019	Visual	DRY	ADD WATER
ULC	1312	DRAIN	10/09/2019	10/17/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
ULC	1312A	DRAIN	10/09/2019	10/09/2019	Visual	DRY	ADD WATER
RHU	3802	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1315	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1316	JCTBOX	10/09/2019	10/09/2019	Visual	MISSING BOLTS	INSTALL SEALANT
ULC	1316A	JCTBOX	10/09/2019	10/09/2019	Visual/M21	COVER PLATE	INSTALL SEALANT
ULC	1317	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1320	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3810	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	206073R	VENT	10/09/2019	10/09/2019	Visual	TRIPPED	RESET
RHU	3811	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3812	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3815	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1330	JCTBOX	10/09/2019	10/09/2019	Visual/M21	COVER PLATE	INSTALL SEALANT
RHU	3817	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	206092R	VENT	10/09/2019	10/09/2019	Visual	TRIPPED	RESET
RHU	6826AA	VENT	10/09/2019	10/09/2019	Visual	TRIPPED	RESET

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ULC	1344	DRAIN	10/09/2019	10/17/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
ULC	1348	DRAIN	10/09/2019	10/17/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
ULC	1352	DRAIN	10/09/2019	10/17/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
ULC	1354	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1355	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1360	DRAIN	10/09/2019	10/17/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
RHU	6812	VENT	10/09/2019	10/14/2019	Visual	TRIPPED	RESET
ULC	1363	DRAIN	10/09/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1365	DRAIN	10/09/2019	10/17/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
ULC	1368	DRAIN	10/09/2019	10/09/2019	Visual	DRY	ADD WATER
ULC	1370	DRAIN	10/09/2019	10/17/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
ULC	1371	DRAIN	10/09/2019	10/17/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
RHU	5449	JCTBOX	10/09/2019	10/09/2019	Visual	GAP AT BOLTS	INSTALL SEALANT
PS3B	2893	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2898	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2899	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2901	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2903	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2911	DRAIN	10/09/2019	10/09/2019	Visual	DRY	ADD WATER
PS3B	2912	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2916	DRAIN	10/09/2019	10/09/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
PS3B	2922	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2923	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2924	DRAIN	10/09/2019	10/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5431	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1379	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1387	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1401	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3795	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3798	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1443	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1445	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3820	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3821	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3822	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3832	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	3833	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2929	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3841	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3842	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1455	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1456	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1465	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1466	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1467	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1472	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1473	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2935	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1474	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1475	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1476A	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1476B	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2936	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ULC	1477	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1478	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3875	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3878	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3881	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3883	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3888	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3889	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3890	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3894	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3901	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3903	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3915	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3916	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2937	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3925	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3926	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3931	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2939	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER

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RHU	3932	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3936	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3937	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1338B	JCTBOX	10/10/2019	10/10/2019	M21	COVER PLATE	INSTALL SEALANT
RHU	3941	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3949	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3951	DRAIN	10/10/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3952	DRAIN	10/10/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2940	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3961	DRAIN	10/10/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2942	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2943	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2944	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2945	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1357	DRAIN	10/10/2019	10/17/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
PS3B	2946	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1359	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
RHU	3972	DRAIN	10/10/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2949	DRAIN	10/10/2019	10/10/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
PS3B	2953	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ULC	1485	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1487	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3967	DRAIN	10/10/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2960	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
RHU	3969	DRAIN	10/10/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3979	DRAIN	10/10/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3980	DRAIN	10/10/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3982	DRAIN	10/10/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3992	DRAIN	10/10/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3995	DRAIN	10/10/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1504	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1507	DRAIN	10/10/2019	10/10/2019	Visual	DRY	ADD WATER
RHU	4002	DRAIN	10/10/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1510	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1513	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1517	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ULC	1519	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1520	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1527	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2964	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2965	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1538	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2969	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2977	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2979	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2980	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2981	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2982	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2983	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2984	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2985	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2986	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2992	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2994	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2996	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3000	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3002	DRAIN	10/10/2019	10/10/2019	Visual	DRY	ADD WATER
PS3B	3010	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	3014	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	3018	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3020	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3021	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3022	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025A	DRAIN	10/10/2019	10/15/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
PS3B	3025B	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025C	CLEAN-OUT	10/10/2019	10/15/2019	Visual	FILLED W/DIRT/DEBRIS	CLEAR DEBRIS
PS3B	3025D	DRAIN	10/10/2019	10/10/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
FCCU3	902914R	VENT	10/10/2019	12/03/2019	Visual	INDICATOR BROKEN	REPLACED INDICATOR
PS3B	3025E	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3029	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3032	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3034	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	3035	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3037	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3043	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3044	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3048	JCTBOX	10/14/2019	10/21/2019	Visual	MISSING BOLTS	REPLACE BOLTS
RHU	4572	DRAIN	10/14/2019	10/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4574	DRAIN	10/14/2019	10/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4577	DRAIN	10/14/2019	10/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4579	DRAIN	10/14/2019	10/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4580	DRAIN	10/14/2019	10/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4611	DRAIN	10/14/2019	10/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4613	DRAIN	10/14/2019	10/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4614	DRAIN	10/14/2019	10/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4616	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4617	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4618	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4634	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4638	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4641	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4643	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4651	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4653	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4654	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4658	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4661	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4663	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4671	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4673	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4674	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4677	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4686	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4690	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4692	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4693	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4649	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4700	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	4701	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4704	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4717	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4717A	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4720	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4727	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4732	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4734	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4736	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4743	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4744	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4749	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4779	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4780	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4790	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4792	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4794	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5182	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5183	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4587	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4588	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4592	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4595	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4600	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5263	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5266	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5267	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5269	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5270	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5274	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5276	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5279	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5284	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5285	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5286	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5287	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	5292	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5293	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5306	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5308	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5316	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5317	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5318	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5330	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6002	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6007	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6010	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6006	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6013	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6014	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6017	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6020	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6023	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6024	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6025	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6026	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6027	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	904	DRAIN	10/14/2019	10/14/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
RHU	6059	DRAIN	10/14/2019	10/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	920A	DRAIN	10/14/2019	10/17/2019	Visual	FILLED W/OIL	CAPPED
ARU	901326R	VENT	10/15/2019	10/15/2019	Visual	TRIPPED	RESET
ARU	901748RA	VENT	10/15/2019	10/29/2019	Visual	TRIPPED	RESET
ARU	901542R	VENT	10/15/2019	10/16/2019	Visual	INDICATOR BROKEN	REPLACED INDICATOR
CFHU	206920R	VENT	10/15/2019	10/15/2019	Visual	TRIPPED	RESET
CFHU	900741R	VENT	10/15/2019	10/15/2019	Visual	TRIPPED	RESET
CFHU	206903R	VENT	10/15/2019	10/15/2019	Visual	TRIPPED	RESET
CFHU	206901R	VENT	10/15/2019	10/15/2019	Visual	TRIPPED	RESET
CFHU	206100R	VENT	10/15/2019	10/15/2019	Visual	TRIPPED	RESET
CFHU	900744R	VENT	10/15/2019	10/15/2019	Visual	TRIPPED	RESET
CFHU	900742R	VENT	10/15/2019	10/15/2019	Visual	TRIPPED	RESET
CFHU	6794AB	VENT	10/15/2019	10/15/2019	Visual	TRIPPED	RESET
CFHU	6796AB	VENT	10/15/2019	10/21/2019	Visual	TRIPPED	RESET

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CFHU	901802RA	VENT	10/15/2019	10/15/2019	Visual	TRIPPED	RESET
DDU	920C	DRAIN	10/16/2019	10/17/2019	Visual	CLOGGED	CAPPED
DDU	920D	DRAIN	10/16/2019	10/17/2019	Visual	CLOGGED	CAPPED
DDU	941	CLEAN-OUT	10/16/2019	10/17/2019	Visual	BROKEN CAP	REPLACED CAP
DDU	953	CLEAN-OUT	10/16/2019	10/17/2019	Visual	COVER PLATE BROKEN	REPLACE CAP
DDU	957	DRAIN	10/16/2019	10/17/2019	Visual	MISSING CAP	CAPPED
DDU	1016	JCTBOX	10/17/2019	10/17/2019	Visual	MISSING BOLTS	INSTALL SEALANT
DDU	1020	CLEAN-OUT	10/17/2019	10/17/2019	Visual	MISSING CAP	ADD CAP
DDU	1027	CLEAN-OUT	10/17/2019	10/17/2019	Visual	COVER PLATE BROKEN	ADD SEALANT
ENVFAC	901447RB	VENT	10/17/2019	10/17/2019	Visual	TRIPPED	RESET
DDU	1070I	DRAIN	10/17/2019	10/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901481R	VENT	10/17/2019	10/17/2019	Visual	TRIPPED	RESET
ENVFAC	12403R	VENT	10/17/2019	10/17/2019	Visual	TRIPPED	RESET
ENVFAC	900830R	VENT	10/17/2019	10/17/2019	Visual	TRIPPED	RESET
DDU	1085	DRAIN	10/17/2019	10/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901153R	VENT	10/17/2019	10/17/2019	Visual	TRIPPED	RESET
DDU	1094	DRAIN	10/17/2019	10/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6064	DRAIN	10/17/2019	10/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6066	DRAIN	10/17/2019	10/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6071	DRAIN	10/17/2019	10/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6072	DRAIN	10/17/2019	10/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6075	DRAIN	10/17/2019	10/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1107	DRAIN	10/17/2019	10/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1112	DRAIN	10/17/2019	10/29/2019	Visual	CLOGGED	HYDROBLAST
PS3B	901674R	VENT	10/17/2019	10/17/2019	Visual	TRIPPED	RESET
RHU	901350R	VENT	10/18/2019	10/18/2019	Visual	TRIPPED	RESET
CFHU	3570	DRAIN	10/18/2019	10/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1929	JCTBOX	10/18/2019	10/24/2019	Visual	MISSING BOLTS	INSTALL SEALANT
COKERS	901676R	VENT	10/18/2019	10/18/2019	Visual	TRIPPED	RESET
FCCU3	2080	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2081	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2090	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2091	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2430	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2431	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2432	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
FCCU3	2434	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2435	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2436	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2437	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2440	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	901670R	VENT	10/18/2019	10/18/2019	Visual	TRIPPED	RESET
PS3B	901674RA	VENT	10/18/2019	10/18/2019	Visual	TRIPPED	RESET
RDU	901684R	VENT	10/18/2019	10/18/2019	Visual	TRIPPED	RESET
FCCU3	2473	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2486	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2487	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2524	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2557	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2559	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2561	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2580	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2582	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	33	DRAIN	10/18/2019	10/24/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
FCCU3	2593	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2614	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2615	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2621	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2624	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2625	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2630	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2631	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2634	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2635	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2636	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2637	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2638	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2639	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2641	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2642	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2644	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2648	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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FCCU3	2654	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2657	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2672	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	901336R	VENT	10/18/2019	10/18/2019	Visual	TRIPPED	RESET
FCCU3	2674	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2679	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2681	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	901708R	VENT	10/18/2019	10/18/2019	Visual	TRIPPED	RESET
FCCU3	2684	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2685	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	901395R	VENT	10/18/2019	10/18/2019	Visual	TRIPPED	RESET
FCCU3	2733	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2736	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2738	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2739	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2740	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2741	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2742	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2744	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2745	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2746	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	206089R	VENT	10/18/2019	10/18/2019	Visual	TRIPPED	RESET
RHU	6820AA	VENT	10/18/2019	10/21/2019	Visual	TRIPPED	RESET
RHU	6822AA	VENT	10/18/2019	10/18/2019	Visual	TRIPPED	RESET
ULC	901492R	VENT	10/18/2019	10/18/2019	Visual	TRIPPED	RESET
ULC	901490R	VENT	10/18/2019	10/18/2019	Visual	TRIPPED	RESET
UU3	901546R	VENT	10/18/2019	10/18/2019	Visual	TRIPPED	RESET
UU3	901467R	VENT	10/18/2019	10/22/2019	Visual	TRIPPED	RESET
UU4	206971R	VENT	10/18/2019	10/18/2019	Visual	TRIPPED	RESET
UU4	88	DRAIN	10/18/2019	10/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3102	DRAIN	10/18/2019	10/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3104	DRAIN	10/18/2019	10/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3105	DRAIN	10/18/2019	10/18/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3108	DRAIN	10/18/2019	10/21/2019	Visual	DRY	ADD WATER
PS3A	3111	DRAIN	10/18/2019	10/18/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3120	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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PS3A	3121	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3122	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3124	DRAIN	10/18/2019	10/18/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
PS3A	3126	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3127	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3129	DRAIN	10/18/2019	10/21/2019	Visual	DRY	ADD WATER
PS3A	3132	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3134	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3135	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3137	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3161	DRAIN	10/18/2019	10/21/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
PS3A	3166	DRAIN	10/18/2019	10/21/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
PS3A	3167	DRAIN	10/18/2019	10/21/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
RHU	901722R	VENT	10/21/2019	10/29/2019	Visual	TRIPPED	RESET
RHU	901566R	VENT	10/21/2019	10/21/2019	Visual	TRIPPED	RESET
RHU	901336R	VENT	10/21/2019	10/29/2019	Visual	TRIPPED	RESET
RHU	6812	VENT	10/21/2019	10/28/2019	Visual	TRIPPED	RESET
RHU	6802AA	VENT	10/21/2019	10/21/2019	Visual	TRIPPED	RESET
RDU	4460	DRAIN	10/21/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4461	DRAIN	10/21/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4464	DRAIN	10/21/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4466	DRAIN	10/21/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4467	DRAIN	10/21/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4468	DRAIN	10/21/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4472	DRAIN	10/21/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4473	DRAIN	10/21/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4474	DRAIN	10/21/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4475	DRAIN	10/21/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4476	DRAIN	10/21/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4500	DRAIN	10/21/2019	10/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	901679RA	VENT	10/21/2019	10/21/2019	Visual	TRIPPED	RESET
COKERS	4405	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4406	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4407	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4409A	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4409B	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
COKERS	4410	DRAIN	10/22/2019	10/22/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
COKERS	4416A	CLEAN-OUT	10/22/2019	10/22/2019	Visual	MISSING CAP	REPLACED CAP
COKERS	4417	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4418	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4419	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4421	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4424	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4425	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4429	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4430	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4431	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4804	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4805	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4806	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4807	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4809	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	56	DRAIN	10/22/2019	10/22/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
COKERS	4818	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4819	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4820	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4824	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4825	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4829	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4832A	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4849	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4850	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4909	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4910	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4911	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4912	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4918	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4919	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4921	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4926	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4927	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4928	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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COKERS	4931	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4932	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4936	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	138	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	147	JCTBOX	10/22/2019	10/24/2019	Visual	MISSING BOLTS	INSTALL SEALANT
ENVFAC	902995R	VENT	10/22/2019	10/22/2019	Visual	TRIPPED	RESET
UU4	204	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	300	DRAIN	10/22/2019	10/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RA	VENT	10/22/2019	10/22/2019	Visual	TRIPPED	RESET
ENVFAC	901447RD	VENT	10/22/2019	10/23/2019	Visual	INDICATOR BROKEN	REPLACED INDICATOR
ENVFAC	901447RE	VENT	10/22/2019	10/29/2019	Visual	TRIPPED	RESET
ENVFAC	901447RF	VENT	10/22/2019	10/29/2019	Visual	TRIPPED	RESET
ENVFAC	901447RG	VENT	10/22/2019	10/29/2019	Visual	TRIPPED	RESET
ENVFAC	901454R	VENT	10/22/2019	10/29/2019	Visual	TRIPPED	RESET
PS3A	3169A	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3170	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3173	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3176	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3181A	DRAIN	10/23/2019	10/24/2019	Visual	CLOGGED	FLUSH OUT W/WATER
UU3	227	OWSEP	10/23/2019	10/29/2019	Visual/M21	COVER PLATE	REPLACE GASKET
PS3A	3185	DRAIN	10/23/2019	10/23/2019	Visual	DRY	ADD WATER
UU3	256	JCTBOX	10/23/2019	10/29/2019	M21	COVER PLATE	INSTALL SEALANT
PS3A	3191A	DRAIN	10/23/2019	10/24/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3191B	DRAIN	10/23/2019	10/24/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	279	JCTBOX	10/23/2019	10/29/2019	Visual/M21	COVER PLATE	INSTALL SEALANT
PS3A	3210	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3214	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5023	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5025	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5028	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5006	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3221	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3222	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3223	DRAIN	10/23/2019	10/24/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3227	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	357	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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UU3	360A	CLEAN-OUT	10/23/2019	10/29/2019	Visual	COVER PLATE BROKEN	REPLACE CAP
UU3	369	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	370	CLEAN-OUT	10/23/2019	10/29/2019	Visual	COVER PLATE BROKEN	REPLACE CAP
PS3A	3262	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3263	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3271	DRAIN	10/23/2019	11/01/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
UU3	383	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5080	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5099	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3279	DRAIN	10/23/2019	11/01/2019	Visual	CLOGGED	HYDROBLAST
PS3A	3275	DRAIN	10/23/2019	11/01/2019	Visual	CLOGGED	HYDROBLAST
PS3A	3276	DRAIN	10/23/2019	11/01/2019	Visual	CLOGGED	HYDROBLAST
PS3A	3281	DRAIN	10/23/2019	11/01/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
ENVFAC	5100	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5105	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5112	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5113	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5114	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3283	DRAIN	10/23/2019	11/01/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
PS3A	3286B	DRAIN	10/23/2019	11/01/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
PS3A	3294	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3294A	DRAIN	10/23/2019	10/27/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5141	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5153	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	410	DRAIN	10/23/2019	10/23/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3291	DRAIN	10/24/2019	10/24/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3292	DRAIN	10/24/2019	10/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3297	DRAIN	10/24/2019	10/24/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3299	DRAIN	10/24/2019	10/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3319A	DRAIN	10/24/2019	10/24/2019	Visual	DRY	ADD WATER
PS3A	3320	DRAIN	10/24/2019	10/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3328A	JCTBOX	10/24/2019	10/24/2019	Visual	COVER PLATE	INSTALL SEALANT
UU3	427	DRAIN	10/24/2019	10/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3349A	DRAIN	10/24/2019	10/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3352	DRAIN	10/24/2019	10/27/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	435	DRAIN	10/24/2019	10/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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PS3A	3368	DRAIN	10/24/2019	11/01/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
UU3	440	DRAIN	10/24/2019	10/24/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3370	DRAIN	10/24/2019	10/27/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3371A	DRAIN	10/24/2019	10/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3372	DRAIN	10/24/2019	10/27/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3374	DRAIN	10/24/2019	11/01/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
PS3A	3375	DRAIN	10/24/2019	10/24/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3388A	DRAIN	10/24/2019	10/27/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3406	DRAIN	10/24/2019	10/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	486	DRAIN	10/24/2019	10/29/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
ENVFAC	5050	DRAIN	10/24/2019	10/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3438	DRAIN	10/24/2019	10/24/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5052	DRAIN	10/24/2019	10/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3736	JCTBOX	10/24/2019	10/24/2019	Visual	MISSING BOLTS	INSTALL SEALANT
UU3	595	DRAIN	10/24/2019	10/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	610	DRAIN	10/24/2019	10/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	432	JCTBOX	10/26/2019	10/29/2019	Visual/M21	GASKET	INSTALL SEALANT
UU3	432	JCTBOX	10/26/2019	10/27/2019	Visual/M21	GASKET	INSTALL SEALANT
UU3	498	JCTBOX	10/26/2019	10/29/2019	Visual/M21	GASKET	INSTALL SEALANT
UU3	498	JCTBOX	10/26/2019	10/27/2019	Visual/M21	GASKET	INSTALL SEALANT
PWR2	6763A	DRAIN	10/26/2019	10/28/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
PWR2	6770	DRAIN	10/26/2019	10/28/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
PWR2	6773A	DRAIN	10/26/2019	10/28/2019	Visual	CLOGGED	ADD WATER
ENVFAC	7058CB.01	CONECT	10/26/2019	10/29/2019	Visual	PLUG	INSTALL PLUG
ENVFAC	7058CD.01	CONECT	10/26/2019	10/28/2019	Visual	MISSING PLUG	REPLACE PLUG
ENVFAC	7058CY.01	CONECT	10/26/2019	10/29/2019	Visual	MISSING PLUG	REPLACE PLUG
ENVFAC	7058DJ.01	CONECT	10/26/2019	10/29/2019	Visual	MISSING PLUG	REPLACE PLUG
ENVFAC	7058DO.01	CONECT	10/26/2019	10/29/2019	Visual	MISSING PLUG	REPLACE PLUG
ENVFAC	7058DZ.01	CONECT	10/26/2019	10/29/2019	Visual	MISSING PLUG	REPLACE PLUG
ENVFAC	7058CH.01	CONECT	10/26/2019	10/29/2019	Visual	MISSING PLUG	REPLACE PLUG
ENVFAC	N24BCB	DRAIN	10/26/2019	11/07/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
ENVFAC	N22FT	JCTBOX	10/27/2019	10/28/2019	Visual/M21	HATCH	INSTALL SEALANT
ENVFAC	N21MH	JCTBOX	10/27/2019	10/28/2019	Visual/M21	COVER PLATE	INSTALL SEALANT
ENVFAC	5072	DRAIN	10/27/2019	10/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5073	DRAIN	10/27/2019	10/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5074	DRAIN	10/27/2019	10/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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ENVFAC	N21AFT	JCTBOX	10/27/2019	10/28/2019	Visual/M21	HATCH	INSTALL SEALANT
ENVFAC	5008	DRAIN	10/27/2019	10/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5008A	DRAIN	10/27/2019	10/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	N17MH	JCTBOX	10/27/2019	10/28/2019	Visual	MISSING BOLTS	INSTALL SEALANT
ENVFAC	N688MH	JCTBOX	10/27/2019	10/28/2019	Visual	MISSING BOLTS	INSTALL SEALANT
ENVFAC	N14MH	JCTBOX	10/27/2019	10/28/2019	Visual/M21	COVER PLATE	INSTALL SEALANT
ENVFAC	N14MH	JCTBOX	10/27/2019	10/28/2019	Visual/M21	COVER PLATE	INSTALL SEALANT
ENVFAC	N708MH	JCTBOX	10/27/2019	10/28/2019	Visual/M21	COVER PLATE	INSTALL SEALANT
ENVFAC	N708DMH	JCTBOX	10/27/2019	10/28/2019	Visual/M21	COVER PLATE	INSTALL SEALANT
RHU	6820AA	VENT	10/28/2019	10/28/2019	Visual	TRIPPED	RESET
RHU	6822AA	VENT	10/28/2019	10/28/2019	Visual	TRIPPED	RESET
CFHU	900746R	VENT	10/28/2019	10/28/2019	Visual	TRIPPED	RESET
CFHU	6796AB	VENT	10/28/2019	10/28/2019	Visual	TRIPPED	RESET
UU3	901467R	VENT	10/29/2019	11/13/2019	Visual	TRIPPED	RESET
ENVFAC	901449R	VENT	10/29/2019	10/29/2019	Visual	TRIPPED	RESET
ENVFAC	901447RB	VENT	10/29/2019	11/06/2019	Visual	TRIPPED	RESET
ENVFAC	901447RD	VENT	10/29/2019	10/30/2019	Visual	TRIPPED	RESET
ENVFAC	206630R	VENT	10/29/2019	11/07/2019	Visual	TRIPPED	RESET
ENVFAC	901717R	VENT	10/30/2019	10/30/2019	Visual	TRIPPED	RESET
ENVFAC	901539R	VENT	10/30/2019	10/30/2019	Visual	TRIPPED	RESET
COKERS	4951	CLEAN-OUT	10/30/2019	10/30/2019	Visual	LOOSE CAP	REPLACE CAP/RESEAL W/SEALANT
COKERS	4449	JCTBOX	10/31/2019	11/07/2019	Visual	MISSING BOLTS ON HATCH	REPLACE BOLTS
PS3A	3736	JCTBOX	11/02/2019	11/08/2019	M21	GASKET	INSTALL SEALANT
PS3A	3737	OWSEP	11/02/2019	11/08/2019	M21	HATCH	INSTALL SEALANT
PS3B	901674R	VENT	11/04/2019	11/04/2019	Visual	TRIPPED	RESET
PS3B	2755A	DRAIN	11/04/2019	11/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2760	DRAIN	11/04/2019	11/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2770	DRAIN	11/04/2019	11/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2782	DRAIN	11/04/2019	11/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2805	DRAIN	11/04/2019	11/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3054	OWSEP	11/04/2019	11/08/2019	Visual/M21	HOLE IN COVER PLATE	INSTALL SEALANT
RHU	901693R	VENT	11/04/2019	11/04/2019	Visual	TRIPPED	RESET
ENVFAC	8091A	SEWERLINE	11/05/2019	11/19/2019	Visual	PUMP SEAL	ISOLATED/ REPAIRED
CFHU	3546	DRAIN	11/05/2019	11/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3550	DRAIN	11/05/2019	11/05/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
CFHU	3552	DRAIN	11/05/2019	11/05/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER

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CFHU	3553	DRAIN	11/05/2019	11/05/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
CFHU	3616	DRAIN	11/05/2019	11/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3712	DRAIN	11/05/2019	11/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3703	DRAIN	11/05/2019	11/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3699	DRAIN	11/05/2019	11/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3662	DRAIN	11/05/2019	11/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3665	DRAIN	11/05/2019	11/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3666	DRAIN	11/05/2019	11/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3679	DRAIN	11/05/2019	11/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	901303R	VENT	11/06/2019	11/08/2019	M21	LEAK ON VACUUM SIDE	RESEAT
UU3	624	JCTBOX	11/06/2019	11/08/2019	M21	HATCH-24" MNWY	INSTALL SEALANT
ENVFAC	8149	CONECT	11/06/2019	11/12/2019	Visual	AVO/VISUAL FAIL/ACCESS PLATE	REPLACE GASKET
PS3B	2876	DRAIN	11/06/2019	11/12/2019	Visual	CLOGGED	HYDROBLAST
PS3B	2893	DRAIN	11/06/2019	11/06/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2941	DRAIN	11/06/2019	11/06/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	3022	DRAIN	11/06/2019	11/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	900699R	VENT	11/07/2019	11/07/2019	Visual	TRIPPED	RESET
RHU	901699R	VENT	11/07/2019	11/07/2019	Visual	TRIPPED	RESET
ENVFAC	N47JMH	JCTBOX	11/07/2019	11/07/2019	Visual	GAP AT BOLTS	TIGHTEN BOLTS
ENVFAC	N137AMH	JCTBOX	11/07/2019	11/08/2019	Visual	MISSING BOLTS	INSTALL SEALANT
ENVFAC	N19MH	JCTBOX	11/07/2019	11/08/2019	Visual	MISSING BOLTS	INSTALL SEALANT
ENVFAC	N58MH	JCTBOX	11/08/2019	11/08/2019	Visual	GAP AT BOLTS	INSTALL SEALANT
ENVFAC	N1132MH	JCTBOX	11/08/2019	11/08/2019	Visual	MISSING BOLTS	INSTALL SEALANT
ENVFAC	N708BDB	JCTBOX	11/08/2019	11/13/2019	Visual	HATCH IS OPEN	CLOSE HATCH
RHU	900751R	VENT	11/11/2019	11/11/2019	Visual	TRIPPED	RESET
RHU	901722R	VENT	11/11/2019	11/11/2019	Visual	TRIPPED	RESET
COKERS	4361	DRAIN	11/11/2019	11/25/2019	Visual	CLOGGED	HYDROBLAST
RHU	900699R	VENT	11/11/2019	11/11/2019	Visual	TRIPPED	RESET
ENVFAC	902988R	VENT	11/11/2019	11/11/2019	Visual	TRIPPED	RESET
ENVFAC	901447RB	VENT	11/11/2019	11/11/2019	Visual	TRIPPED	RESET
ENVFAC	901447RE	VENT	11/11/2019	11/11/2019	Visual	TRIPPED	RESET
ENVFAC	901447RF	VENT	11/11/2019	11/11/2019	Visual	TRIPPED	RESET
ENVFAC	901447RH	VENT	11/11/2019	11/22/2019	Visual	TRIPPED	RESET/REPLACE INDICATOR
ARU	1651	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1653	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1657	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1659	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1660	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1666	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1668	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1669	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1671	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1674	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2992	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2994	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1676	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1680	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1681	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1687	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ARU	1706	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1708	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1714	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1716	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1717	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1718	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1719	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1720	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1703	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1724	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1725	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1732	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1728	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1733	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1735	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1738	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1740	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1744	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1745	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1747	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1749	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1702	DRAIN	11/12/2019	11/12/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
FCCU3	2472	CLEAN-OUT	11/12/2019	11/13/2019	Visual	COVER PLATE BROKEN	REPLACE CAP

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FCCU3	2491	CLEAN-OUT	11/12/2019	11/13/2019	Visual	MISSING CAP	INSTALLED CAP
ARU	1757A	CLEAN-OUT	11/12/2019	11/17/2019	Visual	MISSING CAP	REPLACED CAP
ARU	1766	JCTBOX	11/12/2019	11/17/2019	Visual	COVER PLATE	INSTALL SEALANT
ARU	1768	JCTBOX	11/12/2019	11/17/2019	Visual	COVER PLATE	INSTALL SEALANT
ARU	1775	DRAIN	11/12/2019	11/17/2019	Visual	CLOGGED	FLUSHED
FCCU3	2550	DRAIN	11/13/2019	11/27/2019	Visual	FILLED W/OIL	HYDROBLAST
FCCU3	2552	DRAIN	11/13/2019	11/27/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
FCCU3	2597	DRAIN	11/13/2019	11/27/2019	Visual	CLOGGED	HYDROBLAST
RHU	5418	JCTBOX	11/13/2019	11/20/2019	Visual	COVER PLATE	INSTALL SEALANT
AU2	4524B	DRAIN	11/14/2019	11/25/2019	Visual	CLOGGED	FLUSHED OUT W/HIGH PRESSURE
AU2	712	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	718	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	728	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	729	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	8042	JCTBOX	11/14/2019	11/20/2019	Visual	COVER PLATE	REPLACE COVER PLATE
AU2	730	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	731	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	732	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	8055	JCTBOX	11/14/2019	11/20/2019	Visual	MISSING BOLTS	REPLACE BOLTS
AU2	733	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	735	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	736	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	751	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	755	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	756	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	757	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	760	DRAIN	11/14/2019	11/25/2019	Visual	CLOGGED	HYDROBLAST
AU2	767	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	777	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	779	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	785	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	787	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	801	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4111	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4118	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4129	DRAIN	11/14/2019	11/14/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER

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AU2	826	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	827	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	859	DRAIN	11/14/2019	11/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4224	DRAIN	11/15/2019	11/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1597A	SEWERLINE	11/15/2019	11/19/2019	Visual	PUMP SEAL	ISOLATED
RHU	6512	DRAIN	11/15/2019	11/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6524	DRAIN	11/15/2019	11/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5060	CLEAN-OUT	11/15/2019	11/15/2019	Visual	FILLED W/DIRT/DEBRIS	CLEAR DEBRIS
ENVFAC	5080	DRAIN	11/15/2019	11/15/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5082	CLEAN-OUT	11/15/2019	11/15/2019	Visual	COVER PLATE BROKEN	REPLACE COVER AND ADD SEALANT
ENVFAC	5084	DRAIN	11/15/2019	11/15/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
RHU	6617	DRAIN	11/15/2019	11/15/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5171	DRAIN	11/15/2019	11/15/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
AU2	816B	CLEAN-OUT	11/16/2019	11/16/2019	Visual	DEBRIS	CLEAR DEBRIS
AU2	816C	DRAIN	11/16/2019	11/16/2019	Visual	DEBRIS	CLEAN OUT AND ADD WATER
NDU	665	DRAIN	11/16/2019	11/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
NDU	687	DRAIN	11/16/2019	11/16/2019	Visual	DEBRIS	CLEANED OUT
NDU	689	DRAIN	11/16/2019	11/16/2019	Visual	DEBRIS	CLEANED OUT
NDU	695	DRAIN	11/16/2019	11/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1197	DRAIN	11/16/2019	11/16/2019	Visual	DEBRIS	CLEAN OUT AND ADD WATER
ULC	1198	DRAIN	11/16/2019	11/16/2019	Visual	DEBRIS	CLEAN OUT AND ADD WATER
RHU	3765	DRAIN	11/18/2019	11/26/2019	Visual	CLOGGED	CLEANED OUT
RHU	3767	DRAIN	11/18/2019	11/18/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
RHU	3768	DRAIN	11/18/2019	11/18/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
RHU	3776	DRAIN	11/18/2019	11/18/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
RHU	3781	DRAIN	11/18/2019	11/27/2019	Visual	CLOGGED	HYDROBLAST
RHU	3788	DRAIN	11/18/2019	12/02/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
RHU	3795	DRAIN	11/18/2019	12/02/2019	Visual	CLOGGED	HYDROBLAST
RHU	3798	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1813	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1814	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1816	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1817	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1821	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1822	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1823	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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ARU	1825	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1826	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1827	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1829	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1830	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1831	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1832	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1834	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1836	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1839	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1841	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1842	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1843	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1845	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1848	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1850	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3830	DRAIN	11/18/2019	11/26/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
RHU	3837	DRAIN	11/18/2019	12/02/2019	Visual	CLOGGED	HYDROBLAST
RHU	3838	DRAIN	11/18/2019	11/27/2019	Visual	CLOGGED	HYDROBLAST
ARU	1851	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1852	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1855	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1856	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1857	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1858	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1860	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1861	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1867	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1871	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1872	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1876	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1877	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1878	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1881	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1883	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1884	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ARU	1887	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1888	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1889	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1890	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1893	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1894	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1905	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1906	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1920	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3888	DRAIN	11/18/2019	11/26/2019	Visual	CLOGGED	CLEANED OUT
RHU	3889	DRAIN	11/18/2019	11/26/2019	Visual	CLOGGED	CLEANED OUT
ARU	1937	DRAIN	11/18/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	901722R	VENT	11/18/2019	12/07/2019	Visual	INDICATOR BROKEN	REPLACED INDICATOR
RHU	901100R	VENT	11/18/2019	11/18/2019	Visual	TRIPPED	RESET
RHU	206062R	VENT	11/18/2019	11/18/2019	Visual	TRIPPED	RESET
RHU	900699R	VENT	11/18/2019	11/18/2019	Visual	TRIPPED	RESET
UU4	26	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	27	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	28	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	29	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	30	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	31	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	32	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	35	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	36	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	37	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	38	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	39	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	40	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	43	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	44	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	55	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	63	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	64	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	65	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	66	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
UU4	77A	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	81	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	82	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	88	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	89	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	90	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	91	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	93	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	95	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	98	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	101	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	108	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	111	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	120	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	161	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	186A	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	188	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	189	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	190	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	194	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	196	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	204	DRAIN	11/18/2019	11/18/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	206	DRAIN	11/18/2019	11/18/2019	Visual	DRY	ADD WATER
ENVFAC	901447RD	VENT	11/18/2019	11/18/2019	Visual	TRIPPED	RESET
ULC	1164	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1168	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3909	DRAIN	11/19/2019	11/26/2019	Visual	CLOGGED	CLEANED OUT
RHU	3912	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1184	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3920	DRAIN	11/19/2019	11/26/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	4773	JCTBOX	11/19/2019	11/19/2019	Visual	HATCH	TIGHTEN BOLTS
ENVFAC	4774	JCTBOX	11/19/2019	11/26/2019	Visual	HATCH	ADD SEALANT/CLOSE HATCH
ULC	1192	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1194	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1196	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1202	DRAIN	11/19/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	3946	DRAIN	11/19/2019	12/02/2019	Visual	FILLED W/OIL	HYDROBLAST
ULC	901490RA	VENT	11/19/2019	11/19/2019	Visual	TRIPPED	RESET
ULC	901490RB	VENT	11/19/2019	11/19/2019	Visual	TRIPPED	RESET
RHU	3967	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	42	JCTBOX	11/19/2019	11/19/2019	M21	COVER PLATE	INSTALL SEALANT
UU4	72	JCTBOX	11/19/2019	11/19/2019	M21	COVER PLATE	INSTALL SEALANT
RHU	3980	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
RHU	3983	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901539R	VENT	11/19/2019	11/19/2019	Visual	TRIPPED	RESET
ULC	1212	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1000	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1002	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1003	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1005	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1008	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1011	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1012	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1013	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1023	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1024	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1032	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1033	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1034	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1035	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1037	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1038	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1040	DRAIN	11/19/2019	11/20/2019	Visual	DRY	ADD WATER
ULC	1230	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1055	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1062	DRAIN	11/19/2019	11/20/2019	Visual	DRY	ADD WATER
DDU	1064	DRAIN	11/19/2019	11/20/2019	Visual	DRY	ADD WATER
DDU	1070G	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070I	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1070L	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1074	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1077	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
COKERS	4434B	JCTBOX	11/19/2019	11/19/2019	Visual	COVER PLATE	INSTALL SEALANT
DDU	1079	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1080	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1084	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1085	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1086	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1087	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1093	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1094	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1100	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1102	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1103	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1104A	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1107	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1108	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4416A	CLEAN-OUT	11/19/2019	11/19/2019	Visual	COVER PLATE MISSING	ADD SEALANT/NEW COVER
RHU	5183	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1127	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1128	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	919	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	920	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	920A	DRAIN	11/19/2019	11/20/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
DDU	920B	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	920C	DRAIN	11/19/2019	11/20/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
DDU	920D	DRAIN	11/19/2019	11/20/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
DDU	928	DRAIN	11/19/2019	11/20/2019	Visual	DRY	ADD WATER
DDU	946	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	950	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	965	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	966	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	974	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	995	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	998	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	999	DRAIN	11/19/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4355	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4357	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ULC	1257	DRAIN	11/19/2019	11/19/2019	Visual	DEBRIS	CLEAN OUT AND ADD WATER
COKERS	4361A	DRAIN	11/19/2019	12/02/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
COKERS	4370	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4382	DRAIN	11/19/2019	11/19/2019	Visual	DRY	ADD WATER
COKERS	4384	DRAIN	11/19/2019	11/19/2019	Visual	DRY	ADD WATER
COKERS	4389	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4364	DRAIN	11/19/2019	11/19/2019	Visual	DRY	ADD WATER
COKERS	4410	DRAIN	11/19/2019	12/04/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
COKERS	4385	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4388A	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4396	DRAIN	11/19/2019	11/19/2019	Visual	DRY	ADD WATER
ULC	1274	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4408	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4415	DRAIN	11/19/2019	11/19/2019	Visual	DRY	ADD WATER
RHU	6046	DRAIN	11/19/2019	12/03/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
COKERS	4440	OWSEP	11/19/2019	11/19/2019	Visual	MISSING BOLTS	INSTALL SEALANT
COKERS	4441	JCTBOX	11/19/2019	11/19/2019	Visual	COVER PLATE	INSTALL SEALANT
RHU	6069	DRAIN	11/19/2019	11/19/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
COKERS	4805	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4805B	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4806	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4819	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4820	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4821	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4822	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4823	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4824	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4828	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4831	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4832A	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4837	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4838	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4840	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4848	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4849	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4850	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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ULC	1320	DRAIN	11/19/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4852	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4852A	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4854A	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ULC	1321	DRAIN	11/19/2019	11/19/2019	Visual	DEBRIS	CLEAN OUT AND ADD WATER
ULC	1323	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4855	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4904	DRAIN	11/19/2019	11/19/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1316A	JCTBOX	11/20/2019	11/20/2019	Visual	MISSING BOLTS	INSTALL SEALANT
COKERS	4910	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4911	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1342	DRAIN	11/20/2019	11/20/2019	Visual	DEBRIS	CLEANED OUT
ULC	1343	DRAIN	11/20/2019	11/20/2019	Visual	DEBRIS	CLEAN OUT AND ADD WATER
COKERS	4962	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4965	DRAIN	11/20/2019	12/05/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ULC	1353	DRAIN	11/20/2019	11/20/2019	Visual	DEBRIS	CLEANED OUT
ULC	1363	DRAIN	11/20/2019	12/04/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
RHU	4621	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4937	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
RHU	4625	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4940	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4630	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4634	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4639	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4654	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4663	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4669	CLEAN-OUT	11/20/2019	11/22/2019	Visual	MISSING CAP	INSTALL CAP
DDU	910	JCTBOX	11/20/2019	11/21/2019	Visual/M21	GASKET	INSTALL SEALANT
RHU	4744	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1373	DRAIN	11/20/2019	11/20/2019	Visual	DEBRIS	CLEANED OUT
ULC	1375	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/ OIL	FLUSH W/ WATER
ULC	1381	DRAIN	11/20/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1385	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4919	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4921	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4922	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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ULC	1386	DRAIN	11/20/2019	11/20/2019	Visual	DEBRIS	CLEANED OUT
COKERS	4929	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4931	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4932	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4936	DRAIN	11/20/2019	12/05/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ULC	1393	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4945	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ULC	1394	DRAIN	11/20/2019	11/20/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1398	DRAIN	11/20/2019	11/20/2019	Visual	DEBRIS	CLEANED OUT
ULC	1398A	CLEAN-OUT	11/20/2019	11/20/2019	Visual	MISSING CAP	REPLACE CAP
ULC	1402	DRAIN	11/20/2019	12/04/2019	Visual	CLOGGED	ADD WATER
ULC	1407	DRAIN	11/20/2019	11/20/2019	Visual	DEBRIS	CLEANED OUT
RHU	6841	JCTBOX	11/20/2019	11/21/2019	Visual	MISSING BOLTS	INSTALL SEALANT
RHU	5418A	JCTBOX	11/20/2019	11/25/2019	Visual/M21	HATCH	INSTALL SEALANT
ULC	1440	CLEAN-OUT	11/21/2019	11/21/2019	Visual	COVER PLATE BROKEN	FILL HOLE WITH SILICONE
COKERS	4925	DRAIN	11/21/2019	12/05/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4966	DRAIN	11/21/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4569	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4582	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4701	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	6737A	DRAIN	11/21/2019	12/05/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3169A	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3181	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1448	DRAIN	11/21/2019	11/21/2019	Visual	DEBRIS	CLEANED OUT
PS3A	3251	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5283	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3285	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3291	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1456	DRAIN	11/21/2019	12/05/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
PS3A	3188	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3189	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3197	DRAIN	11/21/2019	11/21/2019	Visual	CLOGGED	ADD WATER
PS3A	3198	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1461	CLEAN-OUT	11/21/2019	11/25/2019	Visual	COVER PLATE BROKEN	REPLACED CAP
PS3A	3349	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3360	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3A	3360A	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3362	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3364	DRAIN	11/21/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3365	DRAIN	11/21/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3367	DRAIN	11/21/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3371A	DRAIN	11/21/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3375B	DRAIN	11/21/2019	11/22/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3376A	DRAIN	11/21/2019	11/22/2019	Visual	DRY	ADD WATER
PS3A	3377	DRAIN	11/21/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3380	DRAIN	11/21/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3381	DRAIN	11/21/2019	11/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3383	DRAIN	11/21/2019	11/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3389	DRAIN	11/21/2019	11/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3390	DRAIN	11/21/2019	11/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3394	DRAIN	11/21/2019	11/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1468	DRAIN	11/21/2019	11/21/2019	Visual	DEBRIS	CLEAN OUT AND ADD WATER
ULC	1475	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1478	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1484	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1485	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1488	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1489	CLEAN-OUT	11/21/2019	11/21/2019	Visual	COVER PLATE HAS HOLE	FILL HOLE W/ SEALANT
ULC	1490	DRAIN	11/21/2019	11/21/2019	Visual	DEBRIS	CLEANED OUT
PS3A	3410	DRAIN	11/21/2019	11/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3411	DRAIN	11/21/2019	11/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3412	DRAIN	11/21/2019	11/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3422	DRAIN	11/21/2019	11/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3423	DRAIN	11/21/2019	11/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1497	DRAIN	11/21/2019	12/06/2019	Visual	CLOGGED	HYDROBLAST
PS3A	3433	DRAIN	11/21/2019	11/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3434	DRAIN	11/21/2019	11/23/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1510	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1512	DRAIN	11/21/2019	12/06/2019	Visual	CLOGGED	HYDROBLAST
ULC	1514	DRAIN	11/21/2019	11/21/2019	Visual	DEBRIS	CLEANED OUT
ULC	1515	DRAIN	11/21/2019	11/21/2019	Visual	DEBRIS	CLEANED OUT
ULC	1517	DRAIN	11/21/2019	11/21/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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ULC	1526	DRAIN	11/21/2019	12/06/2019	Visual	CLOGGED	HYDROBLAST
PS3B	2757A	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2759	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2887	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2923	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2924	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2925	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2926	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2952	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2964	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2965	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2981	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025A	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025B	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025E	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1529	JCTBOX	11/22/2019	11/22/2019	Visual	COVER PLATE	INSTALL SEALANT
ULC	1530	DRAIN	11/22/2019	11/22/2019	Visual	DEBRIS	CLEAN OUT AND ADD WATER
ULC	1535	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1536	DRAIN	11/22/2019	11/22/2019	Visual	DEBRIS	CLEAN OUT AND ADD WATER
ULC	1537	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1539	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1540	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1542	DRAIN	11/22/2019	11/22/2019	Visual	DEBRIS	CLEAN OUT AND ADD WATER
ULC	1542C	DRAIN	11/22/2019	11/22/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PWR2	6773A	DRAIN	11/23/2019	12/04/2019	Visual	FILLED W/DIRT/DEBRIS	HYDROBLAST
RHU	5418A	JCTBOX	11/24/2019	11/25/2019	Visual/M21	HATCH	INSTALL SEALANT
FCCU3	2561	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2562	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2566A	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2566C	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
FCCU3	2568	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2573	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2612	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2619	DRAIN	11/25/2019	11/25/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
FCCU3	2626	DRAIN	11/25/2019	11/25/2019	Visual	CLOGGED	ADD WATER
FCCU3	2630	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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FCCU3	2631	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2633	DRAIN	11/25/2019	11/25/2019	Visual	CLOGGED	ADD WATER
FCCU3	2635	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2636	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2638	DRAIN	11/25/2019	11/25/2019	Visual	CLOGGED	ADD WATER
FCCU3	2639	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2642	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2650	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2651	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2652	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2654	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2656	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2671	DRAIN	11/25/2019	11/25/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
FCCU3	2679	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2680	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2681	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2682	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2684	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2716	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
FCCU3	2738	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2739	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2740	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2741	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2742	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2745	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2746	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RD	VENT	11/25/2019	12/04/2019	Visual	TRIPPED	REPLACE INDICATOR
ENVFAC	901447RH	VENT	11/25/2019	12/02/2019	Visual	TRIPPED	RESET
UU3	507	DRAIN	11/25/2019	11/26/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
FCCU3	2625	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	515	DRAIN	11/25/2019	11/26/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	518	DRAIN	11/25/2019	12/10/2019	Visual	DRY	ADD WATER
CFHU	3524	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	477	DRAIN	11/25/2019	11/26/2019	Visual	CLOGGED	CLEANED OUT
UU3	479	DRAIN	11/25/2019	11/26/2019	Visual	CLOGGED	CLEANED OUT
RHU	6589	JCTBOX	11/25/2019	11/26/2019	Visual	MISSING BOLTS	INSTALL SEALANT

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ENVFAC	5007	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5007A	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5008	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5008A	DRAIN	11/25/2019	11/25/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	534	DRAIN	11/25/2019	11/26/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	535	DRAIN	11/25/2019	12/09/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	541	DRAIN	11/25/2019	11/26/2019	Visual	CLOGGED	CLEANED OUT
CFHU	206099R	VENT	11/25/2019	11/25/2019	Visual	TRIPPED	RESET
ULC	901490RB	VENT	11/26/2019	12/11/2019	Visual	TRIPPED/INDICATOR BROKEN	REPLACE INDICATOR
UU3	608	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	322	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	323	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	324	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	325	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	326	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	327	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	328	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	329	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	331	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	332	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	338	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	339	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	340	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	341	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	342	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	344	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	345	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	347	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	350	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	351	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1552	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	353	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	354	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	356	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	357	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	358	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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UU3	359	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1553	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	383	DRAIN	11/26/2019	11/26/2019	Visual	DRY	ADD WATER
ULC	1555A	DRAIN	11/26/2019	11/26/2019	Visual	DEBRIS	CLEANED OUT
ULC	1556	DRAIN	11/26/2019	11/26/2019	Visual	DEBRIS	CLEANED OUT
UU3	410	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
UU3	467	DRAIN	11/26/2019	11/26/2019	Visual	DRY	ADD WATER
ULC	1561	DRAIN	11/26/2019	11/26/2019	Visual	DEBRIS	CLEANED OUT
UU3	467A	CLEAN-OUT	11/26/2019	11/26/2019	Visual	FILLED W/DIRT/DEBRIS	CLEAR DEBRIS
ULC	1559	DRAIN	11/26/2019	11/26/2019	Visual	DEBRIS	CLEANED OUT
UU3	469	CLEAN-OUT	11/26/2019	11/26/2019	Visual	FILLED W/DIRT/DEBRIS	CLEAR DEBRIS
ULC	1579	DRAIN	11/26/2019	12/11/2019	Visual	CLOGGED	HYDROBLAST
ULC	1579A	DRAIN	11/26/2019	12/11/2019	Visual	CLOGGED	HYDROBLAST
ULC	1580	DRAIN	11/26/2019	12/11/2019	Visual	CLOGGED	HYDROBLAST
UU3	426	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	427	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	428	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	431	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1581	DRAIN	11/26/2019	11/26/2019	Visual	DEBRIS	CLEANED OUT
UU3	436	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	441	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	442	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	444	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	446	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	447	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1584C	DRAIN	11/26/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	452	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	453	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	454	DRAIN	11/26/2019	11/26/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
UU3	451	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	613A	CLEAN-OUT	11/26/2019	11/26/2019	Visual	FILLED W/DIRT/DEBRIS	CLEAR DEBRIS
ULC	1585	JCTBOX	11/26/2019	11/26/2019	Visual	MISSING BOLTS	INSTALL SEALANT
UU3	579	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1586	OWSEP	11/26/2019	12/03/2019	Visual	HATCH	INSTALL SEALANT
ULC	1588	OWSEP	11/26/2019	11/26/2019	Visual	HATCH	INSTALL SEALANT
HRU	5222	DRAIN	11/26/2019	11/26/2019	Visual	DRY	ADD WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ULC	1589	OWSEP	11/26/2019	11/26/2019	Visual	HATCH	TIGHTEN BOLTS
ULC	1592	JCTBOX	11/26/2019	11/26/2019	Visual	COVER PLATE	INSTALL SEALANT
RHU	5431	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4272	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4290	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4217	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1595	OWSEP	11/26/2019	11/26/2019	Visual	HATCH	TIGHTEN BOLTS
ULC	1596	OWSEP	11/26/2019	11/26/2019	Visual	MISSING BOLTS	INSTALL SEALANT
RHU	3832	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4601	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ULC	1477	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5184A	CLEAN-OUT	11/26/2019	11/26/2019	Visual	MISSING CAP	REPLACED CAP
RHU	4143	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5088A	CLEAN-OUT	11/26/2019	11/26/2019	Visual	MISSING CAP	REPLACE COVER ADD SEALANT
ENVFAC	5091	CLEAN-OUT	11/26/2019	11/26/2019	Visual	MISSING COVER	ADD COVER & SEALANT
ENVFAC	5086	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	6731A	CLEAN-OUT	11/26/2019	11/26/2019	Visual	MISSING CAP	INSTALL COVER ADD SEALANT
UU3	1639	JCTBOX	11/26/2019	12/03/2019	Visual	under 4 inches of dirt/debris/ GAP IN SEALANT	DIG UP/REPLACE SEALANT
UU3	257	DRAIN	11/26/2019	11/26/2019	Visual	DEBRIS	CLEANED OUT
UU3	260	DRAIN	11/26/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	261	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	262	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	266	DRAIN	11/26/2019	11/26/2019	Visual	DEBRIS	CLEANED OUT AND ADD WATER
UU3	272	DRAIN	11/26/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	273	DRAIN	11/26/2019	11/26/2019	Visual	DEBRIS	CLEANED OUT
UU3	276	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	277	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	278	DRAIN	11/26/2019	11/27/2019	Visual	DEBRIS	ADD WATER
UU3	280	DRAIN	11/26/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	281	DRAIN	11/26/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	284	DRAIN	11/26/2019	11/26/2019	Visual	DEBRIS	CLEANED OUT
UU3	285	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	287	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	289	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	290	DRAIN	11/26/2019	11/26/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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UU3	292	DRAIN	11/26/2019	12/11/2019	Visual	FILLED W/OIL	HYDROBLAST
UU3	293	DRAIN	11/26/2019	11/26/2019	Visual	DEBRIS	CLEANED OUT
UU3	300	DRAIN	11/26/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	301	DRAIN	11/26/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	302	DRAIN	11/26/2019	11/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	304	DRAIN	11/27/2019	11/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	305	DRAIN	11/27/2019	11/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	306	DRAIN	11/27/2019	11/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	307	DRAIN	11/27/2019	11/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	308	DRAIN	11/27/2019	11/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	309	DRAIN	11/27/2019	11/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	310	DRAIN	11/27/2019	11/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	311	DRAIN	11/27/2019	11/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	312	DRAIN	11/27/2019	11/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	313	DRAIN	11/27/2019	11/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	315	DRAIN	11/27/2019	11/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	316	DRAIN	11/27/2019	11/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	317	DRAIN	11/27/2019	11/27/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1557	DRAIN	11/27/2019	11/27/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	9334	DRAIN	11/27/2019	11/27/2019	Visual	CLOGGED	ATTEMPT TO CLEAN OUT
RHU	4636	DRAIN	11/27/2019	12/11/2019	Visual	CLOGGED	HYDROBLAST
ALKY2	7157N	DRAIN	11/27/2019	12/05/2019	Visual	FILLED W/DIRT/DEBRIS	ISOLATED FROM LIVE SYSTEM
ARU	1662	DRAIN	12/02/2019	12/03/2019	Visual	DRY	ADD WATER
COKERS	4352	DRAIN	12/02/2019	12/17/2019	Visual	CLOGGED	HYDROBLAST
COKERS	4354	DRAIN	12/02/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1664	DRAIN	12/02/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1666	DRAIN	12/02/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1668	DRAIN	12/02/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1669	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1680	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1685	DRAIN	12/02/2019	12/02/2019	Visual	DRY	ADD WATER
ARU	901748RA	VENT	12/02/2019	12/02/2019	Visual	TRIPPED	RESET
UU3	901349R	VENT	12/02/2019	12/02/2019	Visual	TRIPPED	RESET
ARU	1699	DRAIN	12/02/2019	12/03/2019	Visual	DEBRIS	CLEAR DEBRIS
UU3	901475R	VENT	12/02/2019	12/17/2019	Visual	INDICATOR BROKEN	REPLACED INDICATOR
ARU	1703	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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ARU	1720	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1722	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1723	DRAIN	12/02/2019	12/02/2019	Visual	DRY	ADD WATER
ARU	1725	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1728	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4403	DRAIN	12/02/2019	12/02/2019	Visual	DEBRIS	CLEANED OUT
COKERS	4407	DRAIN	12/02/2019	12/02/2019	Visual	DEBRIS	CLEAN OUT AND ADD WATER
CFHU	3479	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3481	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4409A	DRAIN	12/02/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1803	DRAIN	12/02/2019	12/02/2019	Visual	DRY	ADD WATER
ENVFAC	2043	JCTBOX	12/02/2019	12/09/2019	Visual	HATCH IS NOT BOLTED DOWN	REPLACE BOLTS
ENVFAC	2045	JCTBOX	12/02/2019	12/09/2019	Visual	HATCH MISSING BOTTOM OF LATCH TO SECURE CLOSED	BTM OF LATCH SECURED
COKERS	4416	DRAIN	12/02/2019	12/02/2019	Visual	DEBRIS	CLEANED OUT
CFHU	3543	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3544	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4417	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4418	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4419	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4420	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ARU	1852	DRAIN	12/02/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1858	DRAIN	12/02/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1863	DRAIN	12/02/2019	12/03/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4412	DRAIN	12/02/2019	12/02/2019	Visual	DEBRIS	CLEANED OUT
COKERS	4416A	CLEAN-OUT	12/02/2019	12/02/2019	Visual	MISSING CAP	INSTALL CAP W/ SEALANT
CFHU	3582	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1906	DRAIN	12/02/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4424	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4425	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4426	DRAIN	12/02/2019	12/02/2019	Visual	DEBRIS	CLEANED OUT
CFHU	3608	DRAIN	12/02/2019	12/02/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4431	DRAIN	12/02/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RC	VENT	12/02/2019	12/02/2019	Visual	TRIPPED	RESET
ENVFAC	2028	JCTBOX	12/02/2019	12/04/2019	Visual	COVER PLATE	INSTALL SEALANT
CFHU	3629	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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CFHU	3635	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3643	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3655	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3662	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4434E	DRAIN	12/03/2019	12/03/2019	Visual	DEBRIS	CLEANED OUT
CFHU	3664	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3682	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3698	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3699	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3701	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3703	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	3712	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ARU	1808	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
RHU	5364	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5372	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5402	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5404	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5407	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5408	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1196	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5422	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
RHU	4245	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1223	DRAIN	12/03/2019	12/03/2019	Visual	DRY	ADD WATER
RHU	4258	DRAIN	12/03/2019	12/03/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1233	DRAIN	12/03/2019	12/03/2019	Visual	DRY	ADD WATER
RHU	4293	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ULC	1296	DRAIN	12/04/2019	12/04/2019	Visual	DRY	ADD WATER
RHU	4298	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4322	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4335	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4337	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4340	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4341	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4342	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4551	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4551A	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	4552	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4554	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1315	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4111	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4135	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4154	CLEAN-OUT	12/04/2019	12/04/2019	Visual	MISSING CAP	INSTALL CAP
RHU	4166	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4215	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1368	DRAIN	12/04/2019	12/09/2019	Visual	DRY	CAPPED
RHU	4224	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4225	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6509	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1396	DRAIN	12/04/2019	12/04/2019	Visual	DRY	ADD WATER
RHU	6529	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6560	DRAIN	12/04/2019	12/04/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4450	JCTBOX	12/05/2019	12/05/2019	Visual	MISSING BOLTS	INSTALL SEALANT
COKERS	4450A	JCTBOX	12/05/2019	12/05/2019	Visual	MISSING BOLTS	INSTALL SEALANT
COKERS	4801	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4805	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6574	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
COKERS	4808	DRAIN	12/05/2019	12/05/2019	Visual	DEBRIS	CLEANED OUT
ULC	1488	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6617	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6619	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6622A	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4811	JCTBOX	12/05/2019	12/05/2019	Visual	MISSING BOLTS	INSTALL SEALANT
RHU	6632	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6635	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1519	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4814	DRAIN	12/05/2019	12/05/2019	Visual	DEBRIS	CLEANED OUT
RHU	3768	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ULC	1553	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4819	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4821	DRAIN	12/05/2019	12/17/2019	Visual	CLOGGED	HYDROBLAST
RHU	3798	DRAIN	12/05/2019	12/10/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4829	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	3811	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3812	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4831	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3844	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3873	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4839	DRAIN	12/05/2019	12/05/2019	Visual	DEBRIS	CLEANED OUT
COKERS	4840	DRAIN	12/05/2019	12/05/2019	Visual	DEBRIS	CLEANED OUT
RHU	3912	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3915	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3916	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4845	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3927	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4847	DRAIN	12/05/2019	12/05/2019	Visual	DEBRIS	CLEANED OUT
RHU	3941	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3959	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3967	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3978	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4849	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4850	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3982	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3983	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4851	JCTBOX	12/05/2019	12/05/2019	Visual	MISSING BOLTS	INSTALL SEALANT
RHU	3994	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	3995	DRAIN	12/05/2019	12/05/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4852	DRAIN	12/05/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4852A	DRAIN	12/05/2019	12/19/2019	Visual	CLOGGED	HYDROBLAST
COKERS	4865	DRAIN	12/05/2019	12/05/2019	Visual	DEBRIS	CLEANED OUT
COKERS	4866	DRAIN	12/05/2019	12/05/2019	Visual	DEBRIS	CLEANED OUT
COKERS	4854A	DRAIN	12/06/2019	12/06/2019	Visual	DEBRIS	CLEAN OUT AND ADD WATER
COKERS	4867	DRAIN	12/06/2019	12/06/2019	Visual	DEBRIS	CLEAN OUT AND ADD WATER
COKERS	4868	CLEAN-OUT	12/06/2019	12/06/2019	Visual	COVER PLATE HAS A HOLE	INSTALL SEALANT
RHU	4568	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4569	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4873	CLEAN-OUT	12/06/2019	12/06/2019	Visual	COVER PLATE BROKEN	SEAL WITH SEALANT
RHU	4610	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4614	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
RHU	4615	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	776	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4633	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4905	JCTBOX	12/06/2019	12/06/2019	Visual	COVER PLATE	INSTALL SEALANT
AU2	777	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	784	DRAIN	12/06/2019	12/06/2019	Visual	DRY	ADD WATER
COKERS	4907	JCTBOX	12/06/2019	12/06/2019	Visual/M21	MISSING BOLTS	INSTALL SEALANT
AU2	787	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4663	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4909	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4910	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4701	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4911	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4710	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4912	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	826	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	4734	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
AU2	827	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4915	DRAIN	12/06/2019	12/06/2019	Visual	DEBRIS	CLEANED OUT
RHU	4785	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5176	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5177	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4918	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4921	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4922	DRAIN	12/06/2019	12/17/2019	Visual	DEBRIS	HYDROBLAST
RHU	5182	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5183	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4926	DRAIN	12/06/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5263	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4928	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4929	DRAIN	12/06/2019	12/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5269	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5283	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4931	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5286	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5295	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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RHU	5305	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4932	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5313	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	5317	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4934	DRAIN	12/06/2019	12/06/2019	Visual	DEBRIS	CLEANED OUT
COKERS	4940	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6014	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4941	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6015	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4942	DRAIN	12/06/2019	12/06/2019	Visual	DEBRIS	CLEANED OUT
RHU	6016	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6017	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RHU	6020	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4951	CLEAN-OUT	12/06/2019	12/06/2019	Visual	COVER PLATE BROKEN	INSTALL SEALANT
RHU	6036	DRAIN	12/06/2019	12/06/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4955	DRAIN	12/06/2019	12/06/2019	Visual	DEBRIS	CLEANED OUT
COKERS	4957	DRAIN	12/06/2019	12/06/2019	Visual	DEBRIS	CLEANED OUT
COKERS	4960	JCTBOX	12/06/2019	12/06/2019	Visual	MISSING BOLTS	INSTALL SEALANT
COKERS	4961	CLEAN-OUT	12/06/2019	12/06/2019	Visual	DEBRIS	CLEAR DEBRIS
COKERS	4962	DRAIN	12/06/2019	12/06/2019	Visual	DEBRIS	CLEANED OUT
COKERS	4963	DRAIN	12/06/2019	12/06/2019	Visual	DEBRIS	CLEANED OUT
ATLS	8276	CONECT	12/07/2019	12/11/2019	M21	BOTTOM RUBBER CLAMP	ADD SEALANT
ATLS	8258	CONECT	12/07/2019	12/11/2019	M21	RUBBER REDUCER CONNECTOR	ADD SEALANT
ENVFAC	4774	JCTBOX	12/07/2019	12/11/2019	Visual	MISSING BOLTS	INSTALL SEALANT
FCCU3	2406	DRAIN	12/09/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	4969	DRAIN	12/09/2019	12/09/2019	Visual	DEBRIS	CLEANED OUT
FCCU3	2429	DRAIN	12/09/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2435	DRAIN	12/09/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2440	DRAIN	12/09/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2442	DRAIN	12/09/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2459	DRAIN	12/09/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	6737C	DRAIN	12/09/2019	12/09/2019	Visual	DEBRIS	CLEANED OUT
FCCU3	2473	DRAIN	12/09/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2490	DRAIN	12/09/2019	12/09/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
FCCU3	2532	DRAIN	12/09/2019	12/09/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
FCCU3	2550	DRAIN	12/09/2019	12/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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FCCU3	2552	DRAIN	12/09/2019	12/24/2019	Visual	CLOGGED	CLEAN OUT
DDU	946	DRAIN	12/09/2019	12/09/2019	Visual	DRY	ADD WATER
DDU	947	DRAIN	12/09/2019	12/09/2019	Visual	DRY	ADD WATER
DDU	961	DRAIN	12/09/2019	12/09/2019	Visual	DRY	ADD WATER
DDU	1062	DRAIN	12/09/2019	12/09/2019	Visual	DRY	ADD WATER
FCCU3	2572	DRAIN	12/09/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	980	DRAIN	12/09/2019	12/09/2019	Visual	DRY	ADD WATER
FCCU3	2573	DRAIN	12/09/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1002	DRAIN	12/09/2019	12/09/2019	Visual	DRY	ADD WATER
FCCU3	2635	DRAIN	12/09/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1038	DRAIN	12/09/2019	12/09/2019	Visual	DRY	ADD WATER
FCCU3	2639	DRAIN	12/09/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2751	DRAIN	12/09/2019	12/09/2019	Visual	DEBRIS	CLEANED OUT
DDU	1064	DRAIN	12/09/2019	12/09/2019	Visual	DRY	ADD WATER
DDU	1068	DRAIN	12/09/2019	12/09/2019	Visual	DRY	ADD WATER
PS3B	2752	DRAIN	12/09/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2753	DRAIN	12/09/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2754	DRAIN	12/09/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2755	DRAIN	12/09/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2679	DRAIN	12/09/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2755A	DRAIN	12/09/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2680	DRAIN	12/09/2019	12/09/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2681	DRAIN	12/09/2019	12/09/2019	Visual	DRY	ADD WATER
FCCU3	2682	DRAIN	12/09/2019	12/09/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2756	DRAIN	12/09/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	901802RA	VENT	12/09/2019	12/09/2019	Visual	TRIPPED	RESET
PS3B	2759	DRAIN	12/09/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2760	DRAIN	12/09/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2767	DRAIN	12/09/2019	12/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2736	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2738	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2739	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2741	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2742	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
COKERS	901679RA	VENT	12/11/2019	12/12/2019	Visual	TRIPPED	RESET
COKERS	901690R	VENT	12/11/2019	12/11/2019	Visual	TRIPPED	RESET

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PS3B	2768	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2770	DRAIN	12/11/2019	12/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2776	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2777	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	2707	DRAIN	12/11/2019	12/24/2019	Visual	CLOGGED	HYDROBLAST
PS3B	2780	DRAIN	12/11/2019	12/11/2019	Visual	DEBRIS	CLEANED OUT
PS3B	2782	DRAIN	12/11/2019	12/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2785	DRAIN	12/11/2019	12/11/2019	Visual	DEBRIS	CLEANED OUT
PS3B	2786	DRAIN	12/11/2019	12/11/2019	Visual	DRY	ADD WATER
RDU	4451	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4452	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
DDU	1109	DRAIN	12/11/2019	12/11/2019	Visual	DRY	ADD WATER
RDU	4460	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2791	DRAIN	12/11/2019	12/11/2019	Visual	DEBRIS	CLEANED OUT
RDU	4462	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4466	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2794	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4473	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2795	DRAIN	12/11/2019	12/11/2019	Visual	DEBRIS	CLEANED OUT
RDU	4480	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4485	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4490	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2799	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
RDU	4501	DRAIN	12/11/2019	12/11/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2803	DRAIN	12/11/2019	12/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2824	DRAIN	12/11/2019	12/11/2019	Visual	DRY	ADD WATER
RHU	6081	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2828	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2829	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2833	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2834	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	283	DRAIN	12/12/2019	12/12/2019	Visual	DRY	ADD WATER
PS3B	2837	DRAIN	12/12/2019	12/12/2019	Visual	DRY	ADD WATER
PS3B	2838	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3120	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3122	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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PS3A	3126	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3127	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3135	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	332	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2841	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2842	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3138	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	340	DRAIN	12/12/2019	12/12/2019	Visual	DRY	ADD WATER
PS3B	2843	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3168	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2845	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3171	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2846	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3181	DRAIN	12/12/2019	12/12/2019	Visual	DRY	ADD WATER
UU3	382	DRAIN	12/12/2019	12/12/2019	Visual	DRY	ADD WATER
PS3A	3185	DRAIN	12/12/2019	12/12/2019	Visual	DRY	ADD WATER
UU3	384	DRAIN	12/12/2019	12/12/2019	Visual	DRY	ADD WATER
PS3B	2847	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2848	DRAIN	12/12/2019	12/24/2019	Visual	CLOGGED	CLEANOUT
PS3B	2850	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2851	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2852	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2853	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2854	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2855	DRAIN	12/12/2019	12/12/2019	Visual	DEBRIS	CLEANED OUT
PS3B	2857	DRAIN	12/12/2019	12/24/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2858	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3214	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2859	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2860	DRAIN	12/12/2019	12/12/2019	Visual	DEBRIS	CLEAN OUT AND ADD WATER
UU3	429	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	430	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2862	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2863	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3261	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2868	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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PS3B	2869	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	450	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3272	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2870	DRAIN	12/12/2019	12/12/2019	Visual	DEBRIS	CLEANED OUT
PS3B	2871	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	452	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3291	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3296	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3299	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3301	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3302	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2873	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	478	DRAIN	12/12/2019	12/12/2019	Visual	DRY	ADD WATER
PS3A	3319B	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	510	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2891	DRAIN	12/12/2019	12/12/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2893	DRAIN	12/13/2019	12/23/2019	Visual	CLOGGED	CLEANOUT
PS3B	2894	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2896	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	540	DRAIN	12/13/2019	12/13/2019	Visual	DRY	ADD WATER
PS3B	2899	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2901	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2903	DRAIN	12/13/2019	12/13/2019	Visual	DEBRIS	CLEANED OUT
PS3B	2904	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2922	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3349	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	574	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2923	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	585	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3363	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	586	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3365	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3367	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2927	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3371A	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2928	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

Table 2
BWON Inspection and Monitoring Exceptions
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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2929	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3385	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	600	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2934	JCTBOX	12/13/2019	12/13/2019	Visual/M21	COVER PLATE	INSTALL SEALANT
UU3	610	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3397	DRAIN	12/13/2019	12/23/2019	Visual	CLOGGED	CLEANED OUT
PS3B	2935	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3398A	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2936	DRAIN	12/13/2019	12/24/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3A	3403	DRAIN	12/13/2019	12/23/2019	Visual	CLOGGED	CLEANED OUT
PS3A	3406	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3409	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2939	DRAIN	12/13/2019	12/24/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2941	DRAIN	12/13/2019	12/13/2019	Visual	DEBRIS	CLEANED OUT
PS3B	2942	DRAIN	12/13/2019	12/13/2019	Visual	DEBRIS	CLEANED OUT
PS3B	2943	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2944	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3A	3422	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2949	DRAIN	12/13/2019	12/23/2019	Visual	CLOGGED	CLEANOUT
PS3A	3424	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2953	DRAIN	12/13/2019	12/13/2019	Visual	DEBRIS	CLEANED OUT
PS3B	2957	CLEAN-OUT	12/13/2019	12/13/2019	Visual	MISSING CAP	REPLACE CAP/INSTALL SEALANT
PS3A	3433	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2960	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5003A	DRAIN	12/13/2019	12/17/2019	Visual	CLOGGED	CLEAN OUT AND ADD WATER
ENVFAC	5006	DRAIN	12/13/2019	12/18/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5006A	DRAIN	12/13/2019	12/18/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5007	DRAIN	12/13/2019	12/18/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5007A	DRAIN	12/13/2019	12/14/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5008	DRAIN	12/13/2019	12/18/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5008A	DRAIN	12/13/2019	12/18/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2963	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5010	DRAIN	12/13/2019	12/14/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5011	DRAIN	12/13/2019	12/14/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2965	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2967	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

Table 2
BWON Inspection and Monitoring Exceptions
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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	2969	DRAIN	12/13/2019	12/13/2019	Visual	DRY	ADD WATER
PS3B	2970	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2971	DRAIN	12/13/2019	12/13/2019	Visual	DRY	ADD WATER
PS3B	2972	DRAIN	12/13/2019	12/24/2019	Visual	CLOGGED	CLEANOUT
PS3B	2973A	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2974	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2977	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2978	DRAIN	12/13/2019	12/13/2019	Visual	DRY	ADD WATER
PS3B	2979	DRAIN	12/13/2019	12/13/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2980	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2982	DRAIN	12/14/2019	12/14/2019	Visual	DRY	ADD WATER
PS3B	2984	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2992	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2994	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2997	CLEAN-OUT	12/14/2019	12/14/2019	Visual	BROKEN CAP	REPLACE CAP
ENVFAC	5012	DRAIN	12/14/2019	12/18/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	3010	DRAIN	12/14/2019	12/14/2019	Visual	DEBRIS	CLEANED OUT
PS3B	3014	DRAIN	12/14/2019	12/24/2019	Visual	CLOGGED	CLEANOUT
ENVFAC	5019A	DRAIN	12/14/2019	12/23/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5020	CLEAN-OUT	12/14/2019	12/18/2019	Visual	MISSING CAP & OVERFLOWING	CLEAN OUT AND REPLACE CAP
PS3B	3018	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3019	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3020	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3021	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3022	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025A	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025B	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3025C	CLEAN-OUT	12/14/2019	12/14/2019	Visual	DEBRIS	CLEAR DEBRIS
PS3B	3025D	DRAIN	12/14/2019	12/14/2019	Visual	DEBRIS	CLEANED OUT
PS3B	3025E	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3029	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3029A	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3030A	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3031	DRAIN	12/14/2019	12/14/2019	Visual	DEBRIS	CLEANED OUT
PS3B	3032	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3033	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER

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BWON Inspection and Monitoring Exceptions
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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
PS3B	3034	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5023	DRAIN	12/14/2019	12/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5025	DRAIN	12/14/2019	12/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	3035	DRAIN	12/14/2019	12/14/2019	Visual	DRY	ADD WATER
ENVFAC	5026	DRAIN	12/14/2019	12/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	3037	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	3044	DRAIN	12/14/2019	12/14/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	5057	DRAIN	12/14/2019	12/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
PS3B	2761	DRAIN	12/16/2019	12/24/2019	Visual	CLOGGED	CLEANOUT
PS3B	2784	DRAIN	12/16/2019	12/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2792	DRAIN	12/16/2019	12/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
ENVFAC	901447RC	VENT	12/16/2019	12/16/2019	Visual	TRIPPED	RESET
ENVFAC	901447RG	VENT	12/16/2019	12/16/2019	Visual	TRIPPED	RESET
PS3B	2808	DRAIN	12/16/2019	12/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
PS3B	2809	DRAIN	12/16/2019	12/16/2019	Visual	DEBRIS	CLEANED OUT
PS3B	2810	DRAIN	12/16/2019	12/16/2019	Visual	DEBRIS	CLEANED OUT
UU4	30	DRAIN	12/16/2019	12/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	31	DRAIN	12/16/2019	12/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU3	901349R	VENT	12/16/2019	12/16/2019	Visual	TRIPPED	RESET
UU4	36	DRAIN	12/16/2019	12/16/2019	Visual	DRY	ADD WATER
PS3B	2986	DRAIN	12/16/2019	12/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	39	DRAIN	12/16/2019	12/16/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	56	DRAIN	12/16/2019	12/16/2019	Visual	DRY	ADD WATER
PS3B	3056	OWSEP	12/17/2019	12/17/2019	Visual/M21	COVER PLATE	REPLACE COVER PLATE
UU4	92	DRAIN	12/17/2019	12/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
UU4	163	DRAIN	12/17/2019	12/17/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
CFHU	206099R	VENT	12/17/2019	12/17/2019	Visual	TRIPPED	RESET
CFHU	6796AB	VENT	12/17/2019	12/17/2019	Visual	TRIPPED	RESET
CFHU	901802RA	VENT	12/17/2019	12/17/2019	Visual	TRIPPED	RESET
RHU	900699R	VENT	12/17/2019	12/17/2019	Visual	TRIPPED	RESET
RHU	6822AA	VENT	12/17/2019	12/17/2019	Visual	TRIPPED	RESET
PS3B	2887	DRAIN	12/17/2019	12/17/2019	Visual	DRY	ADD WATER
PS3A	3736	JCTBOX	12/18/2019	12/23/2019	M21	COVER PLATE	INSTALL SEALANT
RHU	6812	VENT	12/18/2019	12/18/2019	Visual	TRIPPED	RESET
ENVFAC	901341R	VENT	12/18/2019	12/18/2019	Visual	TRIPPED	RESET
ENVFAC	12403R	VENT	12/18/2019	12/18/2019	Visual	TRIPPED	RESET

Table 2
BWON Inspection and Monitoring Exceptions
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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ENVFAC	4773	JCTBOX	12/18/2019	12/23/2019	Visual	HATCH OPEN	CLOSE HATCH
PWR2	N692BDB	JCTBOX	12/19/2019	12/19/2019	Visual	HATCH	INSTALL SEALANT
ENVFAC	5082	CLEAN-OUT	12/19/2019	12/19/2019	Visual	MISSING CAP	REPLACE COVER
ENVFAC	5091	CLEAN-OUT	12/19/2019	12/19/2019	Visual	MISSING CAP	REPLACE COVER
ENVFAC	5124	DRAIN	12/19/2019	12/19/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5095	DRAIN	12/19/2019	12/23/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5140	DRAIN	12/19/2019	12/23/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5144	DRAIN	12/19/2019	12/23/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	5145	DRAIN	12/19/2019	12/23/2019	Visual	FILLED W/DIRT/DEBRIS	CLEANED OUT/ FLUSH W/ WATER
ENVFAC	901447RA	VENT	12/23/2019	12/23/2019	Visual	TRIPPED	RESET
ENVFAC	901447RB	VENT	12/23/2019	12/23/2019	Visual	TRIPPED	RESET
ENVFAC	901447RG	VENT	12/23/2019	12/23/2019	Visual	TRIPPED	RESET
ULC	901490R	VENT	12/23/2019	12/23/2019	Visual	TRIPPED	RESET
UU4	202A	CLEAN-OUT	12/23/2019	12/23/2019	Visual	MISSING COVER	REPLACED COVER
UU4	181	CLEAN-OUT	12/23/2019	12/23/2019	Visual	MISSING COVER	REPLACED COVER
UU3	901475R	VENT	12/23/2019	01/07/2020	Visual	TRIPPED	REPLACE INDICATOR
Container	V-250324	Vac Box	12/26/2019	12/26/2019	M21	REAR FLANGE LEAKING	REPLACE GASKET
Container	V-250770	Vac Box	12/26/2019	12/26/2019	M21	REAR FLANGE LEAKING	TIGHTEN BOLTS
ENVFAC	9293	JCTBOX	12/26/2019	12/30/2019	M21	SEAL LEAK	REPLACE SEAL
COKERS	04357F	DRAIN	12/30/2019	12/30/2019	Visual	DEBRIS	CLEANED OUT
FCCU3	02692AC	JCTBOX	12/30/2019	12/30/2019	Visual	COVER PLATE	INSTALL SEALANT
COKERS	04357A	JCTBOX	12/30/2019	12/30/2019	Visual/M21	HATCH	INSTALL SEALANT
SRU	07713	CLEAN-OUT	12/30/2019	01/03/2020	Visual	MISSING CAP	REPLACED CAP
SRU	07720	DRAIN	12/30/2019	12/30/2019	Visual	FILLED W/OIL	FLUSH W/ WATER
FCCU3	02692AJ	DRAIN	12/30/2019	12/30/2019	Visual	DEBRIS	CLEANED OUT
FCCU3	02692AL	DRAIN	12/30/2019	12/30/2019	Visual	DEBRIS	CLEAR DEBRIS
FCCU3	02692AM	DRAIN	12/30/2019	12/30/2019	Visual	DEBRIS	CLEAR DEBRIS
FCCU3	02692AQ	DRAIN	12/30/2019	12/30/2019	Visual	DEBRIS	CLEANED OUT
FCCU3	02692AV	DRAIN	12/30/2019	01/07/2020	Visual/M21	DRY	ADD WATER
FCCU3	02692AV	DRAIN	12/30/2019	01/08/2020	Visual/M21	DRY	ADD WATER
FCCU3	02692AX	DRAIN	12/30/2019	12/30/2019	Visual	DEBRIS	CLEAR DEBRIS
FCCU3	2423QA	CLEAN-OUT	12/30/2019	12/30/2019	Visual	MISSING CAP	INSTALL CAP WITH SEALANT
FCCU3	2423ZA	DRAIN	12/30/2019	12/30/2019	Visual	DEBRIS	CLEANED OUT
FCCU3	2423QB	CLEAN-OUT	12/31/2019	12/31/2019	Visual	BROKEN CAP	INSTALL CAP WITH SEALANT
ENVFAC	07327	JCTBOX	12/31/2019	12/31/2019	M21	HATCH	INSTALL SEALANT
SRU	9277	DRAIN	12/31/2019	12/31/2019	Visual	DEBRIS	CLEANED OUT

Table 2
BWON Inspection and Monitoring Exceptions
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Unit	Tag	Class	Date Found	Repair Date	Test Type	Deficiency	Repair Method
ENVFAC	N137CCB	DRAIN	12/31/2019	01/15/2020	Visual	NO GRATING, FULL OF TRASH	REPLACED GRATING, REMOVED TRASH
SRU	9284	DRAIN	12/31/2019	12/31/2019	Visual	DEBRIS	CLEANED OUT
ENVFAC	N21GCB	DRAIN	12/31/2019	01/04/2020	Visual	DRY	ADD WATER
SRU	9288	DRAIN	12/31/2019	01/03/2020	Visual	CLOGGED	FLUSHED OUT
ENVFAC	N21FCB	DRAIN	12/31/2019	01/04/2020	Visual	GRATING STUCK, FULL OF DEBRIS	CLEANED
ENVFAC	N19MH	JCTBOX	12/31/2019	01/07/2020	Visual	MISSING BOLT/LOOSE	INSTALL SEALANT/REPLACE BOLTS
ENVFAC	N19ECB	DRAIN	12/31/2019	01/15/2020	Visual	ESSCO SEAL REMOVED	SEAL PUT IN PLACE
ENVFAC	N131BCB	DRAIN	12/31/2019	01/15/2020	Visual	SEAL REMOVED AND CLOGGED	REINSTALLED SEAL/ REMOVED DEBRIS
ENVFAC	N131CB	DRAIN	12/31/2019	01/07/2020	Visual	CLOGGED	CLEAN OUT AND ADD WATER
ENVFAC	N688MH	JCTBOX	12/31/2019	01/07/2020	Visual	BAD SEAL	INSTALL SEALANT
ENVFAC	N14MH	JCTBOX	12/31/2019	01/07/2020	Visual	BAD SEAL	INSTALL SEALANT
ALKY3	9352	DRAIN	12/31/2019	12/31/2019	Visual	DEBRIS	CLEANED OUT
ALKY3	9354	CLEAN-OUT	12/31/2019	12/31/2019	Visual	DEBRIS	CLEAR DEBRIS
PS3A	3337D	CLEAN-OUT	12/31/2019	01/03/2020	Visual	MISSING CAP	REPLACE CAP
FCCU3	2716	DRAIN	12/31/2019	01/08/2020	Visual	DEBRIS	CLEAR DEBRIS
RHU	6844A	JCTBOX	12/31/2019	01/07/2020	Visual	COVERED W/ DEBRIS	DUG OUT
RHU	6844B	JCTBOX	12/31/2019	01/07/2020	Visual	COVERED W/ DEBRIS	DUG UP
RHU	6861A	DRAIN	12/31/2019	01/07/2020	Visual	CLOGGED	DUG OUT
RHU	6861B	CLEAN-OUT	12/31/2019	01/03/2020	Visual	CAP	ADJUSTED CAP
ENVFAC	9114	JCTBOX	12/31/2019	12/31/2019	M21	COVER PLATE	INSTALL SEALANT
ENVFAC	9119	JCTBOX	12/31/2019	12/31/2019	M21	COVER PLATE	INSTALL SEALANT
ENVFAC	N137DMH	JCTBOX	12/31/2019	01/03/2020	Visual/M21	BAD SEAL	INSTALL SEALANT

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information		
RN: 102535077	CN: 604166868	Account No.: GB-00004-L
Permit No.: O1541	Project No.:	
Area Name: Galveston Bay Refinery	Company Name: Blanchard Refining Company LLC	

II. Certification Type *(Please mark the appropriate box)*

☒ Responsible Official ☐ Duly Authorized Representative

III. Submittal Type *(Please mark the appropriate box) (Only one response can be accepted per form)*

☐ SOP/TOP Initial Permit Application ☐ Update to Permit Application

☐ GOP Initial Permit Application ☐ Permit Revision, Renewal, or Reopening

☒ Other: 2019 Galveston Bay Refinery Total Annual Benzene (TAB) Report

IV. Certification of Truth

This certification does not extend to information which is designated by the TCEQ as information for reference only.

I, Kevin D. Bogard certify that I am the RO
(Certifier Name printed or typed) *(RO or DAR)*

and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:

Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).

Time Period: From _____ to _____
Start Date *End Date*

Specific Dates: 3/30/2020 _____ _____ _____ _____ _____
Date 1 *Date 2* *Date 3* *Date 4* *Date 5* *Date 6*

Signature: _____ Signature Date: 3-30-20

Title: Vice President

Message

From: Darcey, Larry [LDarcey@marathonpetroleum.com]
Sent: 3/30/2020 6:39:15 PM
To: Seager, Cheryl [Seager.Cheryl@epa.gov]; Warda.Omar@tceq.texas.gov; rschultz@gchd.org; nicole.bealle@tceq.texas.gov; McDowell, Justin [McDowell.Justin@epa.gov]
CC: Clingan, Mark A. [maclingan@marathonpetroleum.com]; Palmer, Todd B. [tbpalmer@marathonpetroleum.com]; Meeks, Von J. [vjmeeks@marathonpetroleum.com]; Kaysen, Eric R. [ErKaysen@marathonpetroleum.com]; Sweeley, Brian J. [bjsweeley@marathonpetroleum.com]; Elizondo, Julian J. [JElizondo2@marathonpetroleum.com]; Davis, Erica F. [efdavis@marathonpetroleum.com]; Harrell, Ellen M. [ElHarrell@marathonpetroleum.com]; Cade, Ruth A. [racade@marathonpetroleum.com]
Subject: FW: MPC Request related to COVID-19 Response - Follow-up- Blanchard GBR
Attachments: ATT00001.txt; TCEQ Letter re COVID_MPC_3.19.2020.pdf; GBR TCEQ COVID-19 Letter.pdf

To Whom it May Concern,

The attached letters and email communication are the Blanchard Refining Company LLC, Galveston Bay Refinery COVID-19 enforcement discretion request and, the associated TCEQ approval of that request. You are being copied on the communication for your records. If you have any questions or comments, please contact me at ldarcey@marathonpetroleum.com or 409-502-9009.

Sincerely,

Larry G. Darcey, P.E.
Environmental Supervisor
Marathon Petroleum Company

2401 5th Avenue South
Texas City, Texas 77590
Office: 409-943-7497
Cell: 409-502-9009
Email: ldarcey@marathonpetroleum.com

From: Jonathan Walling <jonathan.walling@tceq.texas.gov>
Sent: Saturday, March 28, 2020 10:32 AM
To: Darcey, Larry <LDarcey@marathonpetroleum.com>
Cc: OCE <OCE@tceq.texas.gov>; Palmer, Todd B. <tbpalmer@marathonpetroleum.com>; Clingan, Mark A. <maclingan@marathonpetroleum.com>; Sweeley, Brian J. <bjsweeley@marathonpetroleum.com>; Bordes, Randy M. <rmbordes@marathonpetroleum.com>; Kaysen, Eric R. <ErKaysen@marathonpetroleum.com>; Meeks, Von J. <vjmeeks@marathonpetroleum.com>; Cade, Ruth A. <racade@marathonpetroleum.com>; Bogard, Kevin D. <kdbogard@marathonpetroleum.com>; Morton, Darlene G. <dmorton@marathonpetroleum.com>
Subject: [EXTERNAL] MPC Request related to COVID-19 Response - Follow-up- Blanchard GBR

Good morning, Mr. Darcey

Your request for enforcement discretion, as presented, relating to LDAR monitoring by Method 21, as prescribed by 40 CFR subparts, 30 TAC 115, and permit conditions is approved with the following qualifications:

- Enforcement discretion is limited to the Texas Commission on Environmental Quality. It does not limit EPA's ability to enforce federal regulations;
- This enforcement discretion will be in effect until May 8, 2020. The required monitoring should be completed as soon as practicable, as conditions allow, before this date. Should an extension beyond this be needed, please re-submit your request; and
- Please note that in some cases the rule citations listed for LDAR are subparts that do include relevant LDAR requirements, but also include requirements that are beyond what is described in your request. As an example, 40 CFR 63 Subpart CC is listed for LDAR, and while CC does include LDAR requirements (40 CFR 63.648), it also includes standards for sources such as process vents and storage vessels. Enforcement discretion for these sources is not considered as part of this approval.

Your request for enforcement discretion, as presented, relating to stack testing and CEMS RATA, as prescribed by 40 CFR subparts, 30 TAC 111, 30 TAC 117, and permit conditions is approved with the following qualifications:

- Enforcement discretion is limited to the Texas Commission on Environmental Quality. It does not limit EPA's ability to enforce federal regulations; and
- This enforcement discretion will be in effect until May 8, 2020. The required testing should be completed as soon as practicable, as conditions allow, before this date. Should an extension beyond this be needed, please re-submit your request.

Regulated entities must maintain records adequate to document activities related to the noncompliance under enforcement discretion, including details of the regulated entity's best efforts to comply.

Regards,

Jonathan Walling, Area Director
Coastal & East Texas Area
Texas Commission on Environmental Quality

From: Darcey, Larry <LDarcey@marathonpetroleum.com>
Sent: Friday, March 27, 2020 3:53 PM
To: Ramiro Garcia <ramiro.garcia@tceq.texas.gov>; OCE <OCE@tceq.texas.gov>
Cc: Palmer, Todd B. <tbpalmer@marathonpetroleum.com>; Clingan, Mark A. <maclingan@marathonpetroleum.com>; Sweeley, Brian J. <bjsweeley@marathonpetroleum.com>; Bordes, Randy M. <rmbordes@marathonpetroleum.com>; Kaysen, Eric R. <ErKaysen@marathonpetroleum.com>; Meeks, Von J. <vjmeeks@marathonpetroleum.com>; Cade, Ruth A. <racade@marathonpetroleum.com>; Bogard, Kevin D. <kdbogard@marathonpetroleum.com>; Morton, Darlene G. <dmorton@marathonpetroleum.com>
Subject: MPC Request related to COVID-19 Response - Follow-up

Mr. Garcia,

In follow up to Marathon's March 19, 2020 submittal from Ruth Cade, please find the attached letter providing the requested supplemental detail for enforcement discretion. This letter is specific to the Blanchard Refining Company LLC (Blanchard) Galveston Bay Refinery (GBR) and it addresses those compliance activities for which enforcement discretion is requested from March 19, 2020 to May 7, 2020. We appreciate your time and consideration on this matter. If you have any questions or comments, please contact me at ldarcey@marathonpetroleum.com or 409-502-9009.

Sincerely,

Larry G. Darcey, P.E.
Environmental Supervisor

Marathon Petroleum Company

2401 5th Avenue South
Texas City, Texas 77590
Office: 409-943-7497
Cell: 409-502-9009
Email: ldarcey@marathonpetroleum.com

From: Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Sent: Saturday, March 21, 2020 7:11 PM
To: Cade, Ruth A. <racade@marathonpetroleum.com>; OCE <OCE@tceq.texas.gov>
Cc: Kaysen, Eric R. <ErKaysen@marathonpetroleum.com>; Bordes, Randy M. <rmbordes@marathonpetroleum.com>; Peterkoski, Timothy J. <tjpeterkoski@marathonpetroleum.com>; Toby Baker <Toby.Baker@tceq.texas.gov>; Tracy Miller <tracy.miller@tceq.texas.gov>; Susan Johnson <susan.johnson@tceq.texas.gov>; Jayme Sadlier <jayme.sadlier@tceq.texas.gov>; Jonathan Walling <jonathan.walling@tceq.texas.gov>; Cynthia Gandee <Cynthia.Gandee@tceq.texas.gov>; David Ramirez <david.ramirez@tceq.texas.gov>; Anita Keese <anita.keese@tceq.texas.gov>
Subject: [EXTERNAL] RE: MPC Request related to COVID-19 Response

Good evening Ms. Cade,

We have reviewed the request for enforcement discretion for your Galveston Bay Refinery, Texas City and El Paso Refinery, El Paso. Currently, we are unable to grant enforcement discretion because your requests are too broad. In order to properly assess your requests we require more detailed information related to the specific regulatory requirement that will not be met due to staffing issues experienced due to the COVID-19 pandemic. To the greatest extent possible, all regulated entities are encouraged to take all available actions necessary to ensure compliance with environmental regulations and permit requirements within the confines of the Governor's Executive Orders and Public Health Disaster Declaration. Enforcement discretion requests should be limited to only those requirements for which noncompliance is unavoidable. Below is guidance we have shared with the regulated community.

With the onset of COVID-19 (coronavirus) and the Governor's Proclamation of a state of disaster in Texas, the TCEQ is aware that regulated entities may be experiencing an impact from a reduced workforce necessary to maintain normal operations at some facilities. All regulated entities are encouraged to take all available actions necessary to ensure compliance with environmental regulations and permit requirements to protect the health and safety of Texans and the environment. However, in the instance that noncompliance is unavoidable directly due to impact from the coronavirus, an email box has been established by TCEQ to accept requests for potential enforcement discretion. Regulated entities should email both OCE@tceq.texas.gov and Ramiro.Garcia@tceq.texas.gov with specific information related to enforcement discretion requests. The OCE email box is monitored daily by multiple TCEQ staff who will ensure the requests are expeditiously addressed. The TCEQ's goal is to provide a response to the regulated entity's request within 24 to 48 hours.

The email should at a minimum include the following:

- Concise statement supporting request for enforcement discretion

- Anticipated duration of need for enforcement discretion
- Citation of rule / permit provision for which enforcement discretion is requested

Regulated entities must maintain records adequate to document activities related to the noncompliance under enforcement discretion, including details of the regulated entity's best efforts to comply.

We are committed to working with the regulated entities to find viable solutions as we cope with this pandemic. If you have questions, we are available to discuss your matter.

Sincerely,

Ramiro Garcia, Jr.
Deputy
Office of Compliance & Enforcement
TCEQ

From: Cade, Ruth A. <racade@marathonpetroleum.com>
Sent: Thursday, March 19, 2020 9:53 AM
To: OCE <OCE@tceq.texas.gov>; Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Cc: Kaysen, Eric R. <ErKaysen@marathonpetroleum.com>; Bordes, Randy M. <rmbordes@marathonpetroleum.com>; Peterkoski, Timothy J. <tjpeterkoski@marathonpetroleum.com>
Subject: MPC Request related to COVID-19 Response

Mr. Garcia,

On behalf of the wholly-owned subsidiaries of Marathon Petroleum Corporation, please find attached a letter requesting deferred compliance obligations, or at a minimum enforcement discretion, so that we can comply with the Centers for Disease Control (CDC), President Trump's guidelines, and Governor Abbot's March 13, 2020 declaration of a State of Disaster response directives to the novel coronavirus (COVID-19). This letter covers two MPC facilities; the Galveston Bay Refinery in Texas City, Texas, and the El Paso Refinery in El Paso, Texas. We (MPC) are committed to continuing our operations to supply necessary transportation fuels as part of critical infrastructure in a safe and environmentally responsible way through the duration of this pandemic. We will apply best efforts to monitor and adequately document any activities that may be non-compliance with applicable rules for the duration.

Should you have questions, or need additional information, you can directly contact the following individuals or me at contact information below.

Randy Bordes, Senior Attorney, at RLBordes@marathonpetroleum.com or by cell (985)-703-2196.
Eric Kaysen, Environmental Manager for Refining at ELKaysen@marathonpetroleum.com or by cell (409) 502-1357

We appreciate TCEQ's leadership in this manner. Stay safe and be well.

Ruth A. Cade

Director, Refining Environmental & Assurance
Office: 419-421-3871
Cell: 606-547-7882
RACade@marathonpetroleum.com

Larry G. Darcey. P.E.
Environmental Supervisor
Galveston Bay Refinery

Blanchard Refining Company LLC
A subsidiary of Marathon Petroleum Company LP

P. O. Box 401
2401 5th Avenue South
Texas City, TX 77592
Tel: 409.945.1011
Fax: 409.941.8292

March 27, 2020

VIA EMAIL TO OCE@TCEQ.TEXAS.GOV AND RAMIRO.GARCIA@TCEQ.TEXAS.GOV

Mr. Ramiro Garcia
Deputy Director
Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, Texas 78753

Re: Request for Regulatory Relief Necessary to Respond to COVID-19
Blanchard Refining Company LLC d/b/a Galveston Bay Refinery

Dear. Mr. Garcia,

This letter is to provide additional details to Marathon Petroleum Corporation's (Marathon)'s March 19, 2020 letter requesting regulatory relief to respond to the novel coronavirus (COVID-19) at its Blanchard Refining Company LLC (Blanchard) Galveston Bay Refinery (GBR). In your March 21, 2020 response email, you indicated that additional detail should be provided on the regulatory relief requested. Specifically, your guidance was that each request must include the following:

- Concise statement supporting request for enforcement discretion
- Anticipated duration of need for enforcement discretion
- Citation of rule / permit provision for which enforcement discretion is requested

The following sections of this letter outline each potential area of non-compliance where enforcement discretion is requested. This request is for the period beginning on date of the March 19, 2020 original request through May 7, 2020.

Leak Detection and Repair (LDAR)

Request: In response to the pandemic, Marathon is limiting access to the site to reduce the risk of spreading the virus to employees in the refinery and the public at large. In addition to requiring non-essential employees to telecommute during this period, the site has gone to a critical-employee only on-site workforce. Thus, Marathon is unable to have a full force of third-party contractors available to perform LDAR tasks. Notably, Marathon's LDAR third-party contractors work in close quarters in the "LDAR Building" which houses close to 50 technicians. These technicians not only share workspaces, but also equipment for monitoring and calibration;

and thus, this building & shared equipment does not meet obligations for at least 6 ft social distancing and disinfection requirements to minimize the potential spread of COVID-19. Further LDAR technicians travel from operations control room to control room to get hot work permits necessary to conduct monitoring; this creates a vector across multiple process units Therefore, enforcement discretion is requested for the temporary cessation of Method 21 monitoring of fugitive equipment and piping connections in VOC service, including temporary cessation of visual pump inspections conducted monthly if performed by 3rd party contractors. This enforcement discretion is also requested for the temporary cessation of quarterly, monthly, and weekly visual inspections of individual drain systems or waste management units subject to the Benzene Operations NESHAP (BWON) and NSPS QQQ. In lieu of performing Method 21 monitoring and associated visual inspections, GBR will establish a perimeter optical gas imaging (OGI) monitoring schedule, i.e. FLIR camera, to check for leaks in each process unit normally monitored via Method 21. Per EPA's memorandum "COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program" dated March 26, 2020, these activities are included activities subject to enforcement discretion.

Duration: Through May 1, 2020. Marathon may later be forced to request an extension to this duration should it be necessary due to the status of the pandemic.

Rule Citation/Permit Condition:_40 CFR 60 Subparts GGG, GGGa, VV, VVa, QQQ, 40 CFR 61 subpart BB, 40 CFR 61 subpart FF, 40 CFR 63 subpart H, 40 CFR 63 subpart CC, 30.TAC Chapter 115, Subchapter D & H, Permit 9606 SC 11, Permit 2231 SC 6 and 29, Permit 47256 SC 51, Permit 2315 SC 10, Permit 22107 SC 31, Permit 46052 SC 11, Permit 19599 SC 9, Permit 22443 SC 10, Permit 2612 SC 15 and Permit 6488 SC 11 and Title V Permit Nos. O-1380 Bay Plant and O-1541 GBR

Stack Testing and CEMS RATAs

Request: Enforcement discretion is requested for the postponement of certain required RATA and stack tests. The postponement is requested to minimize third-party contractors onsite in support of federal social distancing mandates and local stay-at-home orders and to protect the health and safety of critical infrastructure workers. Per EPA's memorandum "COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program" dated March 26, 2020, these activities are included activities subject to enforcement discretion.

Enforcement discretion is requested for the postponement of the following stack tests and CEMS RATA:

i) GBR FCCU3 Permit Required 5-year HCN Stack Test (Due date May 6, 2020)
ii) GBR Dock 30, F-708 Thermal Oxidizer Compliance Test (Due date April 26, 2020)
iii) GBR Engine Testing (11 engines in March 2020, 1 engine in April 2020)

iv) GBR Visible Emission Observations (13 engines and 3 thermal oxidizers due by March 31, 2020[1])
v) GBR SRU Temporary CEMS, EPN384 Annual RATA (Due date March 31, 2020)

Duration: Through May 7, 2020. Marathon may later be forced to request an extension to this duration should it be necessary due to the status of the pandemic.

Rule Citation/Permit Condition: FCCU3 Air Permit 47256 SC. 41K, F708 Air Permit 47256 SC. 41C, Engine Tests 30 TAC 117.8140(b), SRU CEMS 40 CFR 60.105(a)(ii), 30 TAC 111.111 and Title V Permit Nos. O-1380 Bay Plant and O-1541 GBR

Marathon is committed to making every effort possible to ensure compliance during the pandemic with consideration of the health and safety of critical infrastructure staffing and the public. We appreciate your time and consideration on this matter. If you have any questions or comments, please contact me at (409) 502-9009 or ldarcey@marathonpetroleum.com.

Sincerely,

Larry G. Darcey, P.E.
Environmental Supervisor
Galveston Bay Refinery

Cc: Eric Kaysen, Marathon Regional Environmental Manager
Ruth Cade, Director, Refining Environmental
Von Meeks, GBR ES&S Manager
Kevin Bogard, GBR VP and General Manager
Randy Bordes, Marathon Legal Counsel
EPA Region 6, OECA
Galveston County Health Department
TCEQ Region 12

[1] East/West Plant: P-J682 (pump), Coker B (pump), Tank 117 (pump), Tank 4000 (pump), P-615 (pump), P-616 (pump), P-617 (pump), P-618 (pump), Lamella (pump), Docks F-705 (TO), Docks F-708 (TO), Dock 54 (TO); Bay Plant: North Fire Water Pump, South Fire Water Pump, East Fire Water Pump, West Fire Water Pump

Marathon Petroleum Company LP

539 South Main Street
Findlay, OH 45840
Telephone 419/422-2121
FAX 419/425-7040

March 19, 2020

VIA EMAIL TO OCE.TCEQ.TEXAS.GOV AND CERTIFIED U.S. MAIL

Mr. Ramiro Garcia
Deputy Director
Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, Texas 78753

Re: Request for Regulatory Relief Necessary to Respond to Novel Coronavirus (COVID-19)

On behalf of Blanchard Refining Company LLC, Galveston Bay Refining Logistics LLC, South Houston Green Power LLC, Western Refining Company, L.P, and Western Refining Terminals, LLC, wholly owned subsidiaries of Marathon Petroleum Corporation ("MPC"), and pursuant to Governor Greg Abbott's March 13, 2020 declaration of a State of Disaster as part of the State's efforts to respond to the novel coronavirus (COVID-19), this letter requests temporary relief from certain provisions of statutes, rules, orders and permits in an effort to minimize risk of exposure and otherwise respond to COVID-19 without sacrificing the protection of human health and the environment at MPC's Galveston Bay Refinery in Texas City and El Paso Refinery.

MPC is committed to safe and environmentally responsible operation of its operating sites and fully embraces the emergency actions necessary to protect public health. To protect both its employees, site contractors, and the general public, MPC is seeking to temporarily limit certain on-site activities by personnel as part of its larger COVID-19 response to reduce social contact and comport with the "social distancing" guidelines issued by the Texas Department of State Health Services, the Centers for Disease Control and Prevention (CDC), and the President of the United States through his "Coronavirus Guidelines for America" issued on March 16. These guidelines recommend avoiding close contact with other individuals (within 6 feet), avoidance of social gatherings of more than 10 people, avoiding discretionary travel, and working from home whenever possible.

As a member of a critical infrastructure industry, MPC has a special responsibility to continue the safe and environmentally responsible operation of our facilities to ensure fuel supplies are maintained so that other critical infrastructure continues to function during the ongoing

pandemic. We have already instituted a "work-from-home" policy for non-essential personnel consistent with CDC guidance. Despite many of the present actions taken by governments and businesses, the virus continues to spread. Many more cases are being reported daily. We believe that additional restrictions to site personnel will likely be necessary to slow the spread and protect our operations and maintenance personnel critical to running our assets safely and reliably. These steps could include, but are not limited to, restricted access for third party contractors, further restriction of on-site staff to only core operating and maintenance personnel, or reduction of laboratory personnel and thereby analytical capability. As continued restrictions persist, we are also preparing for potential consequences in the supply chain, including inability to transport samples to third-party laboratories and inability to receive consumables.

In order to achieve the common goal of inhibiting the spread of COVID-19, some periodic sampling, testing, recordkeeping and reporting activities can and should be deferred during the present phase of the response in order to protect essential personnel necessary for safe refinery operations. These actions can be safely and responsibly deferred then resumed as soon as conditions are appropriate, estimated to be after July 1, 2020.

Set forth below is a non-exclusive list of provisions and activities identified to date for which MPC is seeking necessary relief to enable its response to COVID-19 at its Galveston Bay Refinery in Texas City and El Paso Refinery. This list may be revised as the response develops.

Key to the request is the recognition that many of these activities drive increased social interactions with third party contractors that enter and leave our facilities, and other neighboring facilities, on a daily basis. Some of the functions identified below also require contractors and consultants to engage in significant travel and overnight accommodations, which further increases the chances of spreading the virus. This runs counter to the "social distancing" recommendations from the CDC, the President of the United States, and the State of Texas. Complicating this further, many contractors and consultants will be not be reporting daily to their normal workplaces and have instituted travel bans for their employees meaning a shortage of qualified personnel to complete certain regulatory requirements. Even though we are prepared to conduct much of our work remotely, it is unprecedented to carry out certain work entirely via remote communications, and indeed impossible to carry out others. As reflected by the list below, the majority of the items reflect a focus on responsibly minimizing onsite activities and social interaction and a lesser access to complete information due to self-isolation (*e.g.*, employee or contractor personnel held home, sick or quarantined).

The following are activities that we are seeking to temporarily defer, and therefore requesting enforcement discretion, to allow effective "social distancing" measures to occur, estimated to be after July 1, 2020.

1. Fugitive Leak Detection and Repair (LDAR):
    a. Deferred LDAR monitoring
    b. Late repair times
    c. Late recheck of LDAR component after monitoring

   d. Delayed reporting

2. Soil or groundwater remediation:
   a. Delayed sampling and monitoring
   b. Delayed reporting

3. CEMS and stack tests:
   a. Late stack test
   b. Late RATA test
   c. Missed or late CEMS evaluation / Cylinder Gas Audits
   d. Unable to repair CEMS due to specialized knowledge vested in personnel
   e. Unable to repair CEMS due to parts unavailability
   f. Excessive downtime due to the above
   g. Delayed reporting

4. Cooling tower sampling:
   a. Delayed sampling and analysis
   b. Delayed reporting

5. Wastewater effluent sampling and reporting:
   a. Deferred samples and whole effluent toxicity (WET) testing
   b. Late lab turn-around time on sample results
   c. Missed hold-time on samples
   d. Delayed reporting

6. Fenceline monitoring:
   a. Sample tube replacement frequency
   b. Disruptions in lab shipments
   c. Lab analytical delays
   d. Delayed reporting

7. Hazardous waste accumulation:
   a. Deferral of movements past time limits, including 3-day satellite accumulation time limit and 90-day accumulation time limit
   b. Delayed reporting

8. MACT and NSPS related equipment inspections and records

9. Monitoring or sampling required under Benzene Waste NESHAPS

10. Regulatory training that can only be accomplished in a face to face setting, e.g. Method 9 Opacity certification.

11. NSR Authorization (Permit, PBR, Standard Permit) required equipment inspections, data reductions, and record creation not specifically addressed above.

We believe that by taking these measures, we can do our part to slow the spread of the COVID-19 virus. This request covers only those provisions requiring activities that are inconsistent with implementation of MPC's COVID-19 response, while maintaining safe and environmentally responsible operation. If you have any questions about this request, please contact me with any questions at 419-421-3871 or racade@marathonpetroleum.com.

Sincerely,

Ruth A. Cade
Director, Refining Environmental & Assurance
Marathon Petroleum Company LP

ED_004791A_00002167-00004

Message

From: Seager, Cheryl [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=837BA829B5634810B2F0B7C5A6CA70D6-SEAGER, CHERYL]
Sent: 3/26/2020 5:56:33 PM
To: Kenney, James, NMENV [James.Kenney@state.nm.us]; Becky Keogh (keogh@adeq.state.ar.us) [keogh@adeq.state.ar.us]; Lourdes Iturralde [Lourdes.Iturralde@LA.GOV]; Scott Thompson (Scott.Thompson@deq.ok.gov) [Scott.Thompson@deq.ok.gov]; ramiro.garcia@tceq.texas.gov
Subject: Enforcement Guidance
Attachments: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program (March 26, 2020).pdf

Hi everyone – we just got the signed copy. Please feel free to send to any staff that may be on the call today.

Talk to you soon.

Cheryl

Cheryl Seager | Director | Enforcement and Compliance Assurance Division | EPA Region 6| Mail Code 6ECAD| 1201 Elm Street| Suite 500 | Dallas, TX 75270 | Phone 214-665-3114 |

Message

From: Kristi Mills-Jurach [Kristi.Mills-Jurach@tceq.texas.gov]
Sent: 5/19/2020 6:49:41 PM
To: Thompson, Steve [thompson.steve@epa.gov]
Subject: FW: [Response Requested] FW: -EXTERNAL- Centennial Resource Production - Clean Air Act Notification of Violations
Attachments: FW: Centennial Resource Production - Clean Air Act Notification of Violations

Kristi Mills-Jurach, P.E.
Director, Program Support and Environmental Assistance
TCEQ Office of Compliance and Enforcement
(512) 239-1261

From: Michael Miller <Michael.Miller@Tceq.Texas.Gov>
Sent: Friday, May 15, 2020 11:41 AM
To: Keith Sheedy <Keith.Sheedy@tceq.texas.gov>; Kendra Houston <kendra.houston@tceq.texas.gov>; Melissa Keller <melissa.keller@tceq.texas.gov>
Cc: Kristi Mills-Jurach <Kristi.Mills-Jurach@tceq.texas.gov>; Marilyn Gates <Marilyn.Gates@tceq.texas.gov>
Subject: RE: [Response Requested] FW: -EXTERNAL- Centennial Resource Production - Clean Air Act Notification of Violations

I was copied on the correspondence by the EPA Region 6 Office of Regional Counsel, so assume we can have a seat at the tele-table if we make the request. It would be farsighted should large penalties start being issued, as was the case recently in Colorado, and we be caught off-guard. Of the 10 or so NOVs I have been copied on thus far, this is the first which has involved a request for a meeting with Region 6 legal representation.

I am copying Kristi and Marilyn and will let them make the call, but feel like we should have representation to take notes at a minimum. The call is scheduled for next Wednesday at 1 PM.

From: Keith Sheedy <Keith.Sheedy@tceq.texas.gov>
Sent: Friday, May 15, 2020 11:00 AM
To: Michael Miller <Michael.Miller@Tceq.Texas.Gov>; Kendra Houston <kendra.houston@tceq.texas.gov>; Melissa Keller <melissa.keller@tceq.texas.gov>
Subject: RE: [Response Requested] FW: -EXTERNAL- Centennial Resource Production - Clean Air Act Notification of Violations

I don't see where the TCEQ has been invited to the meeting. In the past Ramiro and EXEC has not been very open to having the TCEQ being part of the these EPA activities. I would suggest that Kristi ask Ramiro if anyone from the TCEQ should attend.

From: Michael Miller <Michael.Miller@Tceq.Texas.Gov>
Sent: Friday, May 15, 2020 10:45 AM
To: Kendra Houston <kendra.houston@tceq.texas.gov>; Keith Sheedy <Keith.Sheedy@tceq.texas.gov>; Melissa Keller <melissa.keller@tceq.texas.gov>
Subject: [Response Requested] FW: -EXTERNAL- Centennial Resource Production - Clean Air Act Notification of Violations

Good morning,

The EPA Region 6 Office of Regional Counsel has scheduled a teleconference with Centennial Resource Production after a NOV was issued for 18 sites operating in Reeves County. Is this something that we need to invite our legal team to or have OCE management join?

Thanks,
Mike

From: Derrick Melton <Derrick.Melton@cdevinc.com>
Sent: Thursday, May 14, 2020 5:39 PM
To: Stopper, Nathan <stopper.nathan@epa.gov>; Montgomery Floyd <Montgomery.Floyd@cdevinc.com>; Larson, Darrin <Larson.Darrin@epa.gov>; Michael Miller <Michael.Miller@Tceq.Texas.Gov>; Salabogi, Jamie <Salabogi.Jamie@epa.gov>
Cc: Sean Marshall <Sean.Marshall@cdevinc.com>; Heidi Kaczor <heidi.kaczor@cdevinc.com>
Subject: RE: -EXTERNAL- Centennial Resource Production - Clean Air Act Notification of Violations

My apologies, do you guys have access to Microsoft Teams for meetings?

Derrick Melton
HSE Manager Centennial Resource Development, Inc.
Derrick.Melton@cdevinc.com
432-296-8720

From: Derrick Melton
Sent: Thursday, May 14, 2020 5:33 PM
To: Stopper, Nathan <stopper.nathan@epa.gov>; Montgomery Floyd <Montgomery.Floyd@cdevinc.com>; Larson, Darrin <Larson.Darrin@epa.gov>; Michael Miller <michael.miller@tceq.texas.gov>; Salabogi, Jamie <Salabogi.Jamie@epa.gov>
Cc: Sean Marshall <Sean.Marshall@cdevinc.com>; Heidi Kaczor <heidi.kaczor@cdevinc.com>
Subject: RE: -EXTERNAL- Centennial Resource Production - Clean Air Act Notification of Violations

Yes sir, will do. Quick question.

Regards,

Derrick Melton
HSE Manager Centennial Resource Development, Inc.
Derrick.Melton@cdevinc.com
432-296-8720

From: Stopper, Nathan <stopper.nathan@epa.gov>
Sent: Thursday, May 14, 2020 3:12 PM
To: Derrick Melton <Derrick.Melton@cdevinc.com>; Montgomery Floyd <Montgomery.Floyd@cdevinc.com>; Larson, Darrin <Larson.Darrin@epa.gov>; Michael Miller <michael.miller@tceq.texas.gov>; Salabogi, Jamie <Salabogi.Jamie@epa.gov>
Cc: Sean Marshall <Sean.Marshall@cdevinc.com>; Heidi Kaczor <heidi.kaczor@cdevinc.com>
Subject: RE: -EXTERNAL- Centennial Resource Production - Clean Air Act Notification of Violations

WARNING: The sender of this email could not be validated and may not match the person in the "From" field.

Thanks for the confirmation. Please also include Jamie Salabogi from EPA on the invitation.

Regards,
Nathan

From: Derrick Melton <Derrick.Melton@cdevinc.com>
Sent: Thursday, May 14, 2020 2:35 PM
To: Stopper, Nathan <stopper.nathan@epa.gov>; Montgomery Floyd <Montgomery.Floyd@cdevinc.com>; Larson, Darrin <Larson.Darrin@epa.gov>; Michael Miller <michael.miller@tceq.texas.gov>; Salabogi, Jamie <Salabogi.Jamie@epa.gov>
Cc: Sean Marshall <Sean.Marshall@cdevinc.com>; Heidi Kaczor <heidi.kaczor@cdevinc.com>
Subject: RE: -EXTERNAL- Centennial Resource Production - Clean Air Act Notification of Violations

Yes sir. We will have the following on the call.

Mr. Sean Marshall – VP Land – Regulatory falls under his purview.
Mrs. Heidi Kaczor – Regulatory Manager
Mr. Derrick Melton – HSE Manager
Mr. Montgomery Floyd – Air Quality Representative

We will send you a meeting invite if that works for you.

Regards,

Derrick Melton
HSE Manager Centennial Resource Development, Inc.
Derrick.Melton@cdevinc.com
432-296-8720

From: Stopper, Nathan <stopper.nathan@epa.gov>
Sent: Thursday, May 14, 2020 2:29 PM
To: Derrick Melton <Derrick.Melton@cdevinc.com>; Montgomery Floyd <Montgomery.Floyd@cdevinc.com>; Larson, Darrin <Larson.Darrin@epa.gov>; Michael Miller <michael.miller@tceq.texas.gov>; Salabogi, Jamie <Salabogi.Jamie@epa.gov>
Cc: Sean Marshall <Sean.Marshall@cdevinc.com>; Davis O'Connor <Davis.OConnor@cdevinc.com>; Clayton Smith <Clayton.Smith@cdevinc.com>; Corbin Casteel (wcc@four-one-three.com) <wcc@four-one-three.com>; Heidi Kaczor <heidi.kaczor@cdevinc.com>; Jamon Hohensee <Jamon.Hohensee@cdevinc.com>
Subject: RE: -EXTERNAL- Centennial Resource Production - Clean Air Act Notification of Violations

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That would be fine. Can you please let me know who will join on your end?

Thanks,
Nathan

From: Derrick Melton <Derrick.Melton@cdevinc.com>
Sent: Thursday, May 14, 2020 1:56 PM
To: Stopper, Nathan <stopper.nathan@epa.gov>; Montgomery Floyd <Montgomery.Floyd@cdevinc.com>; Larson, Darrin <Larson.Darrin@epa.gov>; Michael Miller <michael.miller@tceq.texas.gov>; Salabogi, Jamie <Salabogi.Jamie@epa.gov>
Cc: Sean Marshall <Sean.Marshall@cdevinc.com>; Davis O'Connor <Davis.OConnor@cdevinc.com>; Clayton Smith <Clayton.Smith@cdevinc.com>; Corbin Casteel (wcc@four-one-three.com) <wcc@four-one-three.com>; Heidi Kaczor <heidi.kaczor@cdevinc.com>; Jamon Hohensee <Jamon.Hohensee@cdevinc.com>
Subject: RE: -EXTERNAL- Centennial Resource Production - Clean Air Act Notification of Violations

Mr. Stopper,

Thank you for replying. Would you be available to join a conference call at 1 pm next Wednesday?

Regards,

Derrick Melton
HSE Manager Centennial Resource Development, Inc.
Derrick.Melton@cdevinc.com
432-296-8720

From: Stopper, Nathan <stopper.nathan@epa.gov>
Sent: Thursday, May 14, 2020 9:53 AM
To: Montgomery Floyd <Montgomery.Floyd@cdevinc.com>; Larson, Darrin <Larson.Darrin@epa.gov>; Michael Miller <michael.miller@tceq.texas.gov>; Salabogi, Jamie <Salabogi.Jamie@epa.gov>
Cc: Sean Marshall <Sean.Marshall@cdevinc.com>; Davis O'Connor <Davis.OConnor@cdevinc.com>; Clayton Smith <Clayton.Smith@cdevinc.com>; Derrick Melton <Derrick.Melton@cdevinc.com>; Corbin Casteel (wcc@four-one-three.com) <wcc@four-one-three.com>; Heidi Kaczor <heidi.kaczor@cdevinc.com>; Jamon Hohensee <Jamon.Hohensee@cdevinc.com>
Subject: RE: -EXTERNAL- Centennial Resource Production - Clean Air Act Notification of Violations

WARNING: The sender of this email could not be validated and may not match the person in the "From" field.

All,

Thank you for acknowledging receipt of the NOV. I am an attorney in the EPA Region 6 Office of Regional Counsel and will be the point of contact going forward on this matter. We would like to schedule a teleconference to discuss next steps. Can you please let me know if Centennial has availability next Wednesday?

Nathan Stopper

Nathan Stopper
Assistant Regional Counsel
U.S. Environmental Protection Agency, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270-2102
(214) 665-7534

From: Montgomery Floyd <Montgomery.Floyd@cdevinc.com>
Sent: Wednesday, May 13, 2020 4:15 PM
To: Larson, Darrin <Larson.Darrin@epa.gov>; Michael Miller <michael.miller@tceq.texas.gov>; Salabogi, Jamie <Salabogi.Jamie@epa.gov>; Stopper, Nathan <stopper.nathan@epa.gov>
Cc: Sean Marshall <Sean.Marshall@cdevinc.com>; Davis O'Connor <Davis.OConnor@cdevinc.com>; Clayton Smith <Clayton.Smith@cdevinc.com>; Derrick Melton <Derrick.Melton@cdevinc.com>; Corbin Casteel (wcc@four-one-three.com) <wcc@four-one-three.com>; Heidi Kaczor <heidi.kaczor@cdevinc.com>; Jamon Hohensee <Jamon.Hohensee@cdevinc.com>
Subject: RE: -EXTERNAL- Centennial Resource Production - Clean Air Act Notification of Violations

Good Afternoon,

Please see attached NOV acknowledgment.

Thank you,

Montgomery Floyd
Environmental Analyst
Mobile: (432) 425-8321

CENTENNIAL
RESOURCE DEVELOPMENT, INC

From: "Larson, Darrin" <Larson.Darrin@epa.gov>
Date: May 12, 2020 at 3:04:09 PM CDT
To: Jamon Hohensee <Jamon.Hohensee@cdevinc.com>
Cc: Michael Miller <michael.miller@tceq.texas.gov>, "Salabogi, Jamie" <Salabogi.Jamie@epa.gov>, "Stopper, Nathan" <stopper.nathan@epa.gov>
Subject: -EXTERNAL- Centennial Resource Production - Clean Air Act Notification of Violations

WARNING: The sender of this email could not be validated and may not match the person in the "From" field.

Please respond to this email upon receipt to indicate that you have received this Notice

Jamon Hohensee
Senior Environmental Analyst
Centennial Resource Production, LLC
jamon.hohensee@cdevinc.com

Dear Mr. Hohensee,

The U.S. Environmental Protection Agency, Region 6 (EPA) has identified Centennial Resource Production, LLC (Centennial) as having violated the Clean Air Act and the regulations promulgated thereunder. Attached is a Notice of Violation (Notice), which is being transmitted to you by email rather than certified mail due to workplace restrictions put in place as a result of the COVID-19 pandemic.

Please respond to this email upon receipt to indicate that you have received this Notice. As indicated in the Notice, EPA is providing Centennial with the opportunity to confer on this pending matter and requests that Centennial contact the EPA representative listed in the Notice within ten (10) business days.

Thank you for your prompt attention to this Notice.

Darrin Larson
Chief, Air Permitting Enforcement Section (ECDAP)

U.S. EPA Region 6
Office: 214-665-7115
Mobile: 972-467-5509

CAUTION: This email originated from outside of the organization. If it appears to be internal, check directly with assumed source

Message

From: Michael Miller [Michael.Miller@Tceq.Texas.Gov]
Sent: 5/15/2020 1:59:28 PM
To: Ryan (Reagyn) Slocum [Ryan.Slocum@Tceq.Texas.Gov]
CC: Larson, Darrin [Larson.Darrin@epa.gov]; Keith Sheedy [keith.sheedy@tceq.texas.gov]; Kendra Houston [kendra.houston@tceq.texas.gov]
Subject: FW: Centennial Resource Production - Clean Air Act Notification of Violations
Attachments: Centennial Resource Production NOV 20200430cs.pdf; Centennial Resource Production NOV Attachment A.pdf; Centennial Resource Production NOV Attachment A.xlsx; RE: -EXTERNAL- Centennial Resource Production - Clean Air Act Notification of Violations

Good morning Ryan,

I am writing to forward you a NOV that Centennial Resource Production received from the EPA for 18 sites following their fall 2019 flyover effort in the Permian Basin. I looked up each RN in Central Registry and all sites were identified as operating in Reeves County. The company has confirmed receipt.

At this time, no further action is required.

Thank you,

Mike Miller
Air Program Liaison
Texas Commission on Environmental Quality
Office of Compliance and Enforcement
(512) 239-0516

How is our customer service? Fill out our customer satisfaction survey at www.tceq.texas.gov/customersurvey.

From: Larson, Darrin <Larson.Darrin@epa.gov>
Sent: Tuesday, May 12, 2020 3:04 PM
To: jamon.hohensee@cdevinc.com
Cc: Michael Miller <Michael.Miller@Tceq.Texas.Gov>; Salabogi, Jamie <Salabogi.Jamie@epa.gov>; Stopper, Nathan <stopper.nathan@epa.gov>
Subject: Centennial Resource Production - Clean Air Act Notification of Violations

Please respond to this email upon receipt to indicate that you have received this Notice

Jamon Hohensee
Senior Environmental Analyst
Centennial Resource Production, LLC
jamon.hohensee@cdevinc.com

Dear Mr. Hohensee,

The U.S. Environmental Protection Agency, Region 6 (EPA) has identified Centennial Resource Production, LLC (Centennial) as having violated the Clean Air Act and the regulations promulgated thereunder. Attached is a Notice of Violation (Notice), which is being transmitted to you by email rather than certified mail due to workplace restrictions put in place as a result of the COVID-19 pandemic.

Please respond to this email upon receipt to indicate that you have received this Notice. As indicated in the Notice, EPA is providing Centennial with the opportunity to confer on this pending matter and requests that Centennial contact the EPA representative listed in the Notice within ten (10) business days.

Thank you for your prompt attention to this Notice.

Darrin Larson
Chief, Air Permitting Enforcement Section (ECDAP)

U.S. EPA Region 6
Office: 214-665-7115
Mobile: 972-467-5509

Message

From: Susan Jablonski [susan.jablonski@tceq.texas.gov]
Sent: 3/24/2020 9:17:51 PM
To: Thompson, Steve [thompson.steve@epa.gov]
Subject: Fwd: API - waiver request to EPA
Attachments: API-Letter-EPA-COVID-19-3-23-20.pdf; ATT00001.htm

Good afternoon, Steve.

I hope you and your family are well tucked and locked in.

Have you seen this request? We have been granting enforcement discretion in specific cases on a case by case basis. I do not believe we have seen such a blanket request as of yet.

I'm sure there is plenty that will be discussed related to this.

Take care,
Susan

> American Petroleum Institute has asked EPA for non-essential compliance discretion on federal and state oil and gas regulations.

Frank J. Macchiarola
Senior Vice President
Policy, Economics & Regulatory Affairs
API
200 Massachusetts, NW
Washington, DC 20001
Telephone 202-682-8167
Fax 202-682-8426
Email macchiarolaf@api.org
www.api.org

March 23, 2020

The Honorable Andrew Wheeler, Administrator
US Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Wheeler:

On behalf of the members of the American Petroleum Institute,[1] I would like to thank you for your efforts at the Environmental Protection Agency to assist in our nation's response to the global crisis arising from the COVID-19 pandemic. The oil and natural gas industry, like other critical infrastructure sectors, is working tirelessly to help ensure there is no interruption in our supply chains as a result of these unprecedented circumstances. We play a critical role in providing affordable and reliable energy, which is essential to maintaining our national security and will help drive our economic recovery. As indicated in a letter dated March 20th from API President and CEO Michael J. Sommers to President Donald J. Trump (attached), there are two potential overarching issues that may affect our industry: critical infrastructure designations and temporary relief through non-essential compliance discretion. The purpose of this letter is to specifically address the issues within your agency's purview associated with non-essential compliance discretion.

Non-essential Compliance Discretion

The oil and natural gas industry remains committed to prioritizing safe and reliable operations, but is taking into consideration that there may be limited personnel capacity

[1] API represents all segments of America's oil and natural gas industry. Its more than 600 members produce, process, and distribute most of the nation's energy. The industry supports 10.9 million U.S. jobs and is backed by a growing grassroots movement of millions of Americans. API was formed in 1919 as a standards-setting organization. In its first 100 years, API has developed more than 700 standards to enhance operational and environmental safety, efficiency and sustainability.

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to manage the full scope of the current regulatory requirements. As such, we are requesting assistance from your agency in temporarily waiving non-essential compliance obligations, and we request coordination with your state agency counterparts as necessary. As indicated in the letter to President Trump, these issues may include recordkeeping, training or other non-safety critical requirements.

Industry is seeking temporary relief through enforcement discretion, waivers or revised compliance timeframes in response to the COVID-19 pandemic. Specifically, industry is asking Federal and State agencies to publicly provide guidance related to performance delays tied to challenges with the pandemic associated with:

- Quarantine/treatment due to employee exposure to COVID-19;
- Measures taken by the industry to avoid COVID-19 transmission and spread;
- Good faith attempts by the industry to comply with national, state or local edicts related to controlling the virus;
- Addressing the risks of continuing to conduct routine agency inspections; and
- Contractor availability and supply chain disruptions related to all of the above.

Individual company requests for relief would be burdensome to file and track and a more holistic approach may be necessary in an unprecedented situation such as the one we are facing. Nonetheless, industry will make efforts to comply with requirements, but obviously the situation may limit some activities.

Additionally, many of the nation's petroleum refineries are parties to one or more state or federal judicial or administrative consent agreements or decrees with the U.S. EPA and/or its state counterparts. These agreements generally include force majeure clauses which require the settling party to notify the government of known or anticipated compliance delays within tight timeframes. Failure to meet the prescribed notification timeframe often voids any enforcement protection the settling party might otherwise have under the agreement. These hurdles become particularly problematic in the current climate of the COVID-19 disease, where delays in meeting settlement

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requirements might occur due to workforce impacts or reductions or other disruptions that are difficult to predict and continue to evolve. They may also be complicated by the daily pronouncement of protection measures suggested or required by national, state and local governments. There may be a need for federal and state officials to work with individual companies as part of their settlement agreements.

Given the considerations associated with the importance of following CDC guidance for public health, the attached list provides detailed examples of issues for which industry is seeking temporary relief through enforcement discretion, waivers or revised compliance timeframes in response to the COVID-19 pandemic.

In closing, the COVID-19 pandemic represents a significant and historic threat to our nation. We thank the Administration for its continued efforts in combating this threat and we thank your agency for its efforts key to this undertaking. We look forward to partnering with you to help ensure that critical fuels are available, so that we as a nation can continue to respond to this crisis. Thank you for consideration of the requests outlined in this letter, and please do not hesitate to contact API as we stand ready to assist in any way possible.

Sincerely,

Frank J. Macchiarola

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Attachment: API Member Company Priority Issues for COVID-19 Response

Industry is seeking temporary relief through enforcement discretion, waivers or revised compliance timeframes in response to the COVID-19 pandemic. Specifically, industry is asking EPA to publicly provide guidance related to performance delays tied to challenges with the pandemic associated with the identified constraints. Given the uncertainty of the severity and duration of this pandemic, the following categories of constraints have been identified:

- Category 1: Administrative constraints while working remotely
- Category 2: Physical constraints with on-site testing/monitoring requirements
- Category 3: Operability of assets

For certain constraints, we have also identified some specific potential solutions in sub-bullets.

Category 1: Administrative challenges while working remotely

EPA and State Agency examples include but are not limited to:

- Wet signatures requirements on permit applications and reports, such as Title V permit applications. Responsible officials may not have ready access to printers or a DocuSign option. Clarity needed on alternatives.
- Temporary relief for notary witnessing of signatures on permits, etc.
- Potential delay to project permits due to closed state agency offices/canceled meetings that may reset the public comment period.
- Deferred permit renewal applications for expiring permits to address revised work schedules/arrangements.
- Potential to miss certifying laboratory equipment unless NIST certified instruments can be purchased and delivered in time.
- Periodic certification and reporting:
    - Deferred filing of periodic reports

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        - Examples include emissions inventory, emissions banking and trading, TRI reports and rule- or permit-required periodic reports.
    - Filing of reports without the normal signatures (where plant manager or formal designee is unavailable).

Category 2: Physical challenges with on-site testing/monitoring/reporting requirements

EPA and State Agency examples include but are not limited to:

- Waivers of seasonal fuels requirements
- Fuels reporting and compliance
    - Request waivers or enforcement discretion for late reports due to access and resource limitations for the following types of reports:
        - Annual gasoline and Renewable Fuel Standard (RFS) reports
        - EMTS Fuels ABT Credit generation and retirement for compliance with gasoline programs
        - EMTS RIN retirements for annual compliance with RFS standards
- Annual gasoline and RFS program attest engagements
- Fugitive Leak Detection and Repair (LDAR)
    - Deferred LDAR monitoring
    - Late repair times
    - Late recheck of LDAR component after monitoring
    - Delayed reporting
    - Inability to address delay of repair during unit shutdowns due to personnel, supply or external resource shortages or disruptions
- Delayed GHG reporting
- Benzene Waste Operations (BWON)
    - Deferred monitoring
    - Late repair times
    - Delayed reporting

- Potential for delayed or missed sampling required for reporting or to demonstrate exemption from control

- NSPS & MACT
  - Regulatory noncompliance due to limited onsite personnel or external resource shortages or disruptions
  - Late reports due to limited onsite personnel or external resource shortages or disruptions
  - Subpart XX tank trucks vapor tightness tests may not be available
  - Lower shipping levels could prevent enough product available to float an internal floating roof tank when refilling, resulting in a compliance issue under GD GACT or NSPS Subpart Kb
- CEMS and stack tests
  - Delayed stack and RATA testing
  - Missed or late CEMS evaluation
  - Unable to repair CEMS due to specialized knowledge vested in personnel
  - Unable to repair CEMS due to parts unavailability
  - Delayed reports from contractors whose employees are quarantined or in remote work arrangements
  - Waive or delay 6-month smoke school recertification due to cancellation of training/testing sessions to avoid unavailability of emissions observers.
- Cooling tower sampling
  - Delayed sampling and analysis
  - Delayed reports from contractors whose employees are quarantined or in remote work arrangements
  - Lack of lab availability
- Fence line monitoring
  - Unable to change sample tubes in a timely manner
  - Disruptions in lab shipments
  - Lab analytical delays

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- Delayed reports from contractors whose employees are quarantined or in remote work arrangements
- Different verifiers for Title V obligations may be unavailable to certify compliance with the requirements
- Extend recurring/refresh deadline for Method 9 (visible emissions) certification.
- Extend deadlines for required visible emission monitoring of permitted facilities.

- Drinking Water Permit testing and reporting requirements
  - Provide flexibility on routine monitoring/sampling/analysis required drinking water permits.
  - Expected delays in laboratory analysis and short hold time for coliform
- Effluent inspections, sampling and reporting (NPDES and SWPPP)
  - Deferred inspections (monthly, quarterly, etc.).
  - Deferred sampling and WET testing.
  - Deferred filing of periodic reports.
  - Late lab turn-around time on sample results.
  - Missed hold-time on samples.
  - Delayed reporting.
  - Delayed annual training.
  - Contractor who typically performs grab samples is temporarily unable to access site pending medical screening.
  - Improper storage temperature.
  - Inability to collect discharge samples within specified time period due to unavailability of personnel.
  - Storm water monitoring and compliance samples within required timeframe (for rain events) may be problematic.
  - Hydrotesting – providing for pre-approval of low-risk discharges and/or a streamlined approval process. This would help prevent holding up construction and field work to get these permits as the current approval processes are likely to slow down with agencies working remotely.

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- Lack of lab availability.
- NPDES/Discharge Permits (EPA/State)
  - Effluent inspections, sampling and reporting.
  - Deferred inspections (monthly, quarterly, etc.).
  - Deferred sampling and WET testing.
  - Deferred filing of periodic reports.
  - Late lab turn-around time on sample results.
  - Missed hold-time on samples.
  - Delayed reporting.
  - Contractor who typically performs daily grab samples is temporarily unable to access site pending medical screening.
  - Improper storage temperature.
- Storm Water Permit Compliance (SWPPP/SWP/Discharge Plans) (EPA/State)
  - Possible disruption of required inspections.
  - Challenges with post storm event inspections due to contractor availability.
  - Sample collection and delayed laboratory analyses.
  - Possible delay of BMP inspections and non-compliance repairs to BMPs due to limited contractor availability.
  - Delayed monitoring/annual reporting requirements
- Soil and/or groundwater remediation
  - Delayed sampling and reporting requirements.
  - Delayed project implementation.
  - Lack of lab availability.
- Tanks
  - Potential for late repairs on failed tank inspections
  - Tank inspections (deadlines and logistical issues)
  - Delayed above or underground tank inspections
- Hazardous waste management
  - Ensure that waste and hazardous waste fall under the definition of essential travel/trade.

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- Deferral of movements past time limits, including 3-day satellite accumulation time limit and 90-day accumulation time limit.
- Impacts on speculative accumulation requirements.
- Delayed analytics and delayed waste characterization.
- Delayed reporting of specific RCRA permit or remediation program.
- Manifest management disruptions.
- TSD permit noncompliance due to personnel, supply or external resource shortages or disruptions.
- Deferral of weekly inspections.
- Delay of annual training.
- Potential for missed weekly RCRA inspections due to personnel shortage.
- Temporary EPA ID number request processing.
- Renewal of Hazardous Material Transporter ID numbers (annual; via DOT).
- Delayed/limited analytical laboratory support for profiling.

- SPCC
  - SPCC applicability determinations.
  - Generation of site security diagrams.
  - Secondary containment repairs.
  - Deferral of daily and monthly inspections.
  - Deferral of annual training and drills.
  - API Standard 653 integrity inspections.
- Underground Injection Control (UIC)
  - Overall UIC compliance obligations.
  - Deferred Mechanical Integrity Testing (MITs).
  - Deferred monthly/annual monitoring requirements.
  - Surface Injection Pressure monitoring.
  - Injection fluid sampling & laboratory analyses.
  - Monthly disposal volume reporting.
- Self-audits/disclosures (where applicable)
  - Late notices.
  - Late Disclosures of Violation and other submittals on pending audits.

  - Late implementation of corrective actions.
- Emergency response drills and mandatory equipment deployment to demonstrate emergency readiness.
- Past-due regulatory training that can only be done in a face-to-face environment, e.g. Method 9 opacity certification.
- Fees for TSCA risk evaluation
  - Manufacturers of 20 high priority chemicals required to conduct risk evaluation by May 27, 2020. Delays needed to gather information from many sources in short timeframe.
- Chemical testing requirements
  - Laboratory capacity may be affected – could impact TSCA testing requests/requirements.
- Chemical Data Reporting (CDR)
  - EPA extending CDR reporting 2 months; EPA should consider additional extensions from potential delays due to needed EPA training, electronic reporting system functioning, etc.

Category 3: Operability of Assets

The industry is already prioritizing their resources for the continued maintenance of its facilities, which is a business-critical activity. This is necessary to not only provide for the safety of its constrained employee and contractor workforce, but also to continue to produce the fuels that the nation depends upon daily. Operators are continuing to obtain permits for activities that are deemed essential to the safe operation of their facilities.

Temporary relief from the agency requirements outlined in Categories 1 and 2 are not expected to result in a significant impact to human health or the environment. By providing temporary relief from those requirements, operators and suppliers will be able to prioritize their resources on those critical activities to enable the continued production of fuels and products.

Message

From: Bowman, Meagan D [meagan.d.bowman@exxonmobil.com]
Sent: 6/5/2020 8:57:48 PM
To: Foley, Patrick [Foley.Patrick@epa.gov]; R6CAACDDeliverables [R6CAACDDeliverables@epa.gov]; jmack@matrixneworld.com; Starfield, Lawrence [Starfield.Lawrence@epa.gov]; Gray, David [gray.david@epa.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; tom.mariani@usdoj.gov; Brooks, Phillip [Brooks.Phillip@epa.gov]
Subject: ExxonMobil Baytown Refinery - Update 2 to Potential Force Majeure Event as a Result of COVID-19
Attachments: 20200605 EM BTRF EPA CD Force Majeure Update 2 - COVID19 (Case No. 05-C-....pdf

Pursuant to Paragraph 218 of the Consent Decree between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, attached please find Update 2 to the Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Refinery.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
5000 Bayway Drive, CAB W-121a
Baytown, Texas 77520
Lync: 346.259.2345
Mobile: 281.917.5014
Fax: 346.259.5788

From: Bowman, Meagan D
Sent: Friday, May 8, 2020 5:36 PM
To: 'foley.patrick@epa.gov' <foley.patrick@epa.gov>; 'R6CAACDDeliverables@epa.gov' <R6CAACDDeliverables@epa.gov>; 'jmack@matrixneworld.com' <jmack@matrixneworld.com>; 'starfield.lawrence@epa.gov' <starfield.lawrence@epa.gov>; 'gray.david@epa.gov' <gray.david@epa.gov>; 'seager.cheryl@epa.gov' <seager.cheryl@epa.gov>; 'tom.mariani@usdoj.gov' <tom.mariani@usdoj.gov>; 'brooks.phillip@epa.gov' <brooks.phillip@epa.gov>
Subject: ExxonMobil Baytown Refinery - Update 1 to Potential Force Majeure Event as a Result of COVID-19

Pursuant to Paragraph 218 of the Consent Decree between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, attached please find Update 1 to the Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Refinery.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
5000 Bayway Drive, CAB W-121a
Baytown, Texas 77520
Lync: 346.259.2345
Mobile: 281.917.5014
Fax: 346.259.5788

From: Bowman, Meagan D
Sent: Wednesday, April 8, 2020 5:32 PM
To: 'foley.patrick@epa.gov' <foley.patrick@epa.gov>; 'R6CAACDDeliverables@epa.gov' <R6CAACDDeliverables@epa.gov>; 'jmack@matrixneworld.com' <jmack@matrixneworld.com>; 'neichlin@matrixengineering.com' <neichlin@matrixengineering.com>; 'Lawrence.Starfield@epa.gov' <Lawrence.Starfield@epa.gov>; 'Samuel.Coleman@epa.gov' <Samuel.Coleman@epa.gov>; 'tom.mariani@usdoj.gov'

<tom.mariani@usdoj.gov>; 'brooks.phillip@epa.gov' <brooks.phillip@epa.gov>
Subject: ExxonMobil Baytown Refinery - Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19

Pursuant to Paragraph 218 of the Consent Decree between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, attached please find a Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Baytown Refinery.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
5000 Bayway Drive, CAB W-121a
Baytown, Texas 77520
Lync: 346.259.2345
Mobile: 281.917.5014
Fax: 346.259.5788

Exxon Mobil Corporation
5000 Bayway Drive
P.O. Box 4004
Baytown, Texas 77522-4004

ExxonMobil

June 5, 2020

Chief
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, DC 20044-7611
Reference Case No. 90-5-2-1-07030
CERTIFIED MAIL NO. 7019 1120 0001 9502 6622
RETURN RECEIPT REQUESTED

Director
Air Enforcement Division
Office of Regulatory Enforcement
U.S. Environmental Protection Agency
Ariel Rios Building, Mail Code 2242-A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 1120 0001 9502 6639
RETURN RECEIPT REQUESTED

Chief
Chemical Accident Enforcement Section (ECDAD)
Air Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency - Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270-2102
CERTIFIED MAIL NO. 7019 1120 0001 9502 6646
RETURN RECEIPT REQUESTED

Re: Update 2 to Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Refinery

Dear Sirs and Madams:

Pursuant to Paragraph 218 of the Consent Decree ("CD") between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, entered on December 13, 2005, the ExxonMobil Baytown Refinery submitted notification dated April 8, 2020, that a force majeure event as described in Paragraph 218 of the CD (herein, "Force Majeure") may potentially occur as a result of the global pandemic outbreak of Coronavirus Disease 2019 ("COVID-

19"). The ExxonMobil Baytown Refinery subsequently submitted an update to the initial notification dated May 7, 2020.

In subsequent correspondence and communications, EPA has acknowledged receipt of notifications from other ExxonMobil sites and also acknowledged that potential impacts could result from COVID-19, but reserved judgment on Force Majeure claims until specific impacts to regulatory obligations were incurred.

ExxonMobil continues to take diligent and prudent actions to protect the health and safety of its workers, the public and the environment, and to meet market needs as the COVID-19 pandemic continues. As of the date of this letter, no potential compliance issues have arisen since our initial notification, and more importantly, the ExxonMobil Baytown Refinery has been able to successfully meet its regulatory obligations under the CD. While there are promising developments in the global COVID-19 pandemic response, the situation remains quite fluid. ExxonMobil is faced with unprecedented challenges and constraints in refining, fuel, and chemical supply and demand chains, as well as personnel restrictive measures (e.g., stay at home orders, travel restrictions, illness, and precautionary exposure protection measures). As such, ExxonMobil still considers the potential Force Majeure an on-going situation and the initial notification still active.

ExxonMobil will continue to provide follow-up communications, as needed, if potential compliance issues are identified. Should you have any questions or concerns regarding this submittal, please contact Meagan Bowman at (346) 259-2345 or meagan.d.bowman@exxonmobil.com.

Sincerely,

Jeffrey K. Kovacs, P.E.
Baytown Complex SSHE Manager

cc:
Director, Air Enforcement Division
Office of Regulatory Enforcement
c/o Matrix New World Engineering, Inc.
120 Eagle Rock Ave., Suite 207
East Hanover, NJ 07936
CERTIFIED MAIL NO. 7019 1120 0001 9502 6653
RETURN RECEIPT REQUESTED

Mr. Andrew Wheeler
Environmental Protection Agency Administrator
EPA Administrator Mail Code 1101A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 1120 0001 9502 6660
RETURN RECEIPT REQUESTED

Mr. Lawrence Starfield
Environmental Protection Agency Acting Assistant Administrator
Air Enforcement Division Director Mail Code 2201A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 1120 0001 9502 6677
RETURN RECEIPT REQUESTED

Mr. Michael Shapiro
Environmental Protection Agency Acting Assistant Administrator
EPA Office of Water Mail Code 1101A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 1120 0001 9502 6684
RETURN RECEIPT REQUESTED

Mr. Ken McQueen
Environmental Protection Agency Region 6 Regional Administrator
1201 Elm Street, Suite 500
Dallas, TX 75270
CERTIFIED MAIL NO. 7019 1120 0001 9502 6691
RETURN RECEIPT REQUESTED

Mr. Toby Baker
Executive Director
Texas Commission on Environmental Quality
P.O. Box 13087, MC-109
Austin, TX 78711-3087
CERTIFIED MAIL NO. 7019 1120 0001 9502 6707
RETURN RECEIPT REQUESTED

Ms. Nicole Bealle
Regional Director
Texas Commission on Environmental Quality Region 12
5425 Polk Street, Suite H
Houston, TX 77023-1452
CERTIFIED MAIL NO. 7019 1120 0001 9502 6714
RETURN RECEIPT REQUESTED

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jmack@matrixneworld.com
starfield.lawrence@epa.gov
gray.david@epa.gov
seager.cheryl@epa.gov
tom.mariani@usdoj.gov
brooks.phillip@epa.gov

Message

From: Bowman, Meagan D [meagan.d.bowman@exxonmobil.com]
Sent: 5/8/2020 10:36:19 PM
To: Foley, Patrick [Foley.Patrick@epa.gov]; R6CAACDDeliverables [R6CAACDDeliverables@epa.gov]; jmack@matrixneworld.com; Starfield, Lawrence [Starfield.Lawrence@epa.gov]; Gray, David [gray.david@epa.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; tom.mariani@usdoj.gov; Brooks, Phillip [Brooks.Phillip@epa.gov]
Subject: ExxonMobil Baytown Refinery - Update 1 to Potential Force Majeure Event as a Result of COVID-19
Attachments: 20200507 EM BTRF EPA CD Force Majeure Update 1 - COVID19 (Case No. 05-C-....pdf

Pursuant to Paragraph 218 of the Consent Decree between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, attached please find Update 1 to the Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Refinery.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
5000 Bayway Drive, CAB W-121a
Baytown, Texas 77520
Lync: 346.259.2345
Mobile: 281.917.5014
Fax: 346.259.5788

From: Bowman, Meagan D
Sent: Wednesday, April 8, 2020 5:32 PM
To: 'foley.patrick@epa.gov' <foley.patrick@epa.gov>; 'R6CAACDDeliverables@epa.gov' <R6CAACDDeliverables@epa.gov>; 'jmack@matrixneworld.com' <jmack@matrixneworld.com>; 'neichlin@matrixengineering.com' <neichlin@matrixengineering.com>; 'Lawrence.Starfield@epa.gov' <Lawrence.Starfield@epa.gov>; 'Samuel.Coleman@epa.gov' <Samuel.Coleman@epa.gov>; 'tom.mariani@usdoj.gov' <tom.mariani@usdoj.gov>; 'brooks.phillip@epa.gov' <brooks.phillip@epa.gov>
Subject: ExxonMobil Baytown Refinery - Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19

Pursuant to Paragraph 218 of the Consent Decree between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, attached please find a Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Baytown Refinery.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
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Exxon Mobil Corporation
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Baytown, Texas 77522-4004

ExxonMobil

May 7, 2020

Chief
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, DC 20044-7611
Reference Case No. 90-5-2-1-07030
CERTIFIED MAIL NO. 7019 1120 0001 9502 5489
RETURN RECEIPT REQUESTED

Director
Air Enforcement Division
Office of Regulatory Enforcement
U.S. Environmental Protection Agency
Ariel Rios Building, Mail Code 2242-A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 1120 0001 9502 5496
RETURN RECEIPT REQUESTED

Chief
Chemical Accident Enforcement Section (ECDAD)
Air Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency - Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270-2102
CERTIFIED MAIL NO. 7019 1120 0001 9502 5502
RETURN RECEIPT REQUESTED

Re: Update 1 to Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Refinery

Dear Sirs and Madams:

Pursuant to Paragraph 218 of the Consent Decree ("CD") between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, entered on December 13, 2005, the ExxonMobil Baytown Refinery submitted notification dated April 8, 2020, that a force majeure event as described in Paragraph 218 of the CD (herein, "Force Majeure") may

potentially occur as a result of the global pandemic outbreak of Coronavirus Disease 2019 ("COVID-19").

In subsequent correspondence and communications, EPA has acknowledged receipt of notifications from other ExxonMobil sites and also acknowledged that potential impacts could result from COVID-19, but reserved judgment on Force Majeure claims until specific impacts to regulatory obligations were incurred. EPA also requested periodic updates (e.g., 30-day follow-ups) and additional notifications if sites identify compliance issues due to COVID-19 impacts.

ExxonMobil continues to take diligent and prudent actions to protect the health and safety of its workers, the public and the environment, and to meet market needs as the COVID-19 pandemic continues. As of the date of this letter, no potential compliance issues have arisen since our initial notification, and more importantly, the ExxonMobil Baytown Refinery has been able to successfully meet its regulatory obligations under the CD. While there are promising developments in the global COVID-19 pandemic response, the situation remains quite fluid. ExxonMobil is faced with unprecedented challenges and constraints in refining, fuel, and chemical supply and demand chains, as well as personnel restrictive measures (e.g., stay at home orders, travel restrictions, illness, and precautionary exposure protection measures). As such, ExxonMobil still considers the potential Force Majeure an on-going situation and the initial notification still active.

ExxonMobil will continue to provide follow-up communications, as needed, if potential compliance issues are identified. Should you have any questions or concerns regarding this submittal, please contact Meagan Bowman at (346) 259-2345 or meagan.d.bowman@exxonmobil.com.

Sincerely,

Jeffrey K. Kovacs, P.E.
Baytown Complex SSHE Manager

cc:
Director, Air Enforcement Division
Office of Regulatory Enforcement
c/o Matrix New World Engineering, Inc.
120 Eagle Rock Ave., Suite 207
East Hanover, NJ 07936
CERTIFIED MAIL NO. 7019 1120 0001 9502 5519
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Mr. Andrew Wheeler
Environmental Protection Agency Administrator
EPA Administrator Mail Code 1101A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
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RETURN RECEIPT REQUESTED

Mr. Lawrence Starfield
Environmental Protection Agency Acting Assistant Administrator
Air Enforcement Division Director Mail Code 2201A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 1120 0001 9502 5533
RETURN RECEIPT REQUESTED

Mr. Michael Shapiro
Environmental Protection Agency Acting Assistant Administrator
EPA Office of Water Mail Code 1101A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 1120 0001 9502 5540
RETURN RECEIPT REQUESTED

Mr. Ken McQueen
Environmental Protection Agency Region 6 Regional Administrator
1201 Elm Street, Suite 500
Dallas, TX 75270
CERTIFIED MAIL NO. 7019 1120 0001 9502 5557
RETURN RECEIPT REQUESTED

Mr. Toby Baker
Executive Director
Texas Commission on Environmental Quality
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Austin, TX 78711-3087
CERTIFIED MAIL NO. 7019 1120 0001 9502 5564
RETURN RECEIPT REQUESTED

Ms. Nicole Bealle
Regional Director
Texas Commission on Environmental Quality Region 12
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Houston, TX 77023-1452
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jmack@matrixneworld.com
starfield.lawrence@epa.gov
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tom.mariani@usdoj.gov
brooks.phillip@epa.gov

Message

From: Stone, Randall (ENRD) [Randall.Stone@usdoj.gov]
Sent: 4/28/2020 9:13:07 PM
To: david.m.gorsich@exxonmobil.com; beaumont.env.admin@exxonmobil.com
CC: Lannen, Justin [Lannen.Justin@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Larson, Darrin [Larson.Darrin@epa.gov]; Spina, Providence [Spina.Providence@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]
Subject: Attached letter response to March 27, 2020, Notification of Force Majeure Event and Request for Enforcement Discretion for the ExxonMobil Beaumont Facilities
Attachments: April 28 Response to Beaumont FM notice.pdf; Exxon BMRF CD Force Majeure Notice Letter COVID 19 3.27.20.pdf

Randall M. Stone
Senior Attorney
Environmental Enforcement Section
U.S. Department of Justice
Phone: (202) 514-1308
Mobile: (202) 532-3270
E-Mail: randall.stone@usdoj.gov

U.S. Department of Justice

Environment and Natural Resources Division

DJ #90-5-2-1-07030

Environmental Enforcement Section
P.O. Box 7611
Washington, DC 20044-7611

Telephone (202) 514-1308
Facsimile (202) 616-6584
randall.stone@usdoj.gov

April 28, 2020

BY ELECTRONIC MAIL

David M. Gorsich
Stephen Codoluto
ExxonMobil Fuels & Lubricants Company
P.O. Box 3311
Beaumont, TX 77704-3311

E-Mail: david.m.gorsich@exxonmobil.com
beaumont.env.admin@exxonmobil.com

Re: Force Majeure Notification Concerning the Beaumont Refinery Under 2005 Consent Decree

Dear Sirs:

We have received your letter of March 27, 2020, submitting a force majeure notice due to the impact of the novel coronavirus COVID-19. This letter will serve as the initial response on behalf of the United States pursuant to the Consent Decree entered in *United States v. Exxon Mobil Corp.*, No. 05-cv-5809 (N.D. Ill.).

Your letter states that it was sent "out of an abundance of caution" to give notice of a "potential force majeure event" that may give rise to "potential compliance issues." It discusses "an initial set of potential exceedances and compliance issues at the Beaumont Facilities that would most likely occur in the initial phases of COVID-19 response, along with the anticipated impact time period." Your letter then notes that "it is possible" that the effects of COVID-19 may inhibit ExxonMobil's ability to satisfy some Consent Decree obligations relating to the Beaumont Refinery's leak detection and repair program, Benzene Waste NESHAP compliance program, continuous emissions monitoring systems and continuous parametric monitoring systems, and semi-annual reporting, as well as other obligations imposed by permits and regulations. Your letter concludes by saying:

> Within 30 days of the mailing of this letter, a follow-up letter will be sent out to provide an update of any impacts and the recovery of the

Beaumont Area Facilities from COVID-19. Additional updates will be provided throughout the duration of the pandemic period.

We appreciate your notice under the Decree and your commitment that "[a]ll reasonable efforts will be made by ExxonMobil to ensure compliance with the Consent Decree and all other applicable federal and state regulations and permits." As you know, the Decree requires that ExxonMobil "take all reasonable steps" to maintain compliance with Decree requirements despite a force majeure event, including steps to "prevent or minimize" delays. Consent Decree ¶ 218. Please adhere to the force majeure provisions of the Decree to the extent you believe any delays in ExxonMobil's obligations are warranted. For any matters falling outside the scope of the Consent Decree – including all issues concerning the ExxonMobil Colonial Storage Facility – ExxonMobil should adhere to the guidance given in EPA's recent Memorandum entitled "COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program" (March 26, 2020), which is mentioned in your letter. *See* https://www.epa.gov/sites/production/files/2020-03/documents/oecamemooncovid19implications.pdf.

Because your notice does not identify specific obligations that ExxonMobil anticipates *will not be met* due to a potential force majeure event, the United States must defer judgment on ExxonMobil's force majeure claim at this time. For a force majeure claim to be ripe for consideration, ExxonMobil should identify particular obligation(s) that will be delayed by the asserted force majeure event, along with the specific information required by the force majeure section of the Decree. This may well require multiple notices, depending on the deadlines for different obligations and the effect of the event on those deadlines. We look forward to receiving the follow-up notifications with periodic updates promised by your letter. The United States' decision to defer judgment at this time should not be construed as acceptance of any potential noncompliance at the facility covered by the Decree.

Thank you for your attention to these matters. Please feel free to contact me to discuss any of these issues further.

Sincerely,

RANDALL STONE

Digitally signed by RANDALL STONE
Date: 2020.04.28 16:58:04 -04'00'

Randall M. Stone
Senior Attorney

ED_004791B_00000140-00002

Copies (by email) to

Justin Lannen, EPA
Cheryl Barnett, EPA
Darrin Larson, EPA
Providence Spina, EPA
Gregory Fried, EPA

ExxonMobil
Fuels & Lubricants Company
PO Box 3311
Beaumont, Texas 77704-3311

ExxonMobil

March 27, 2020

Chief
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, DC 20044-7611
Reference Case No. 90-5-2-1-07030
CERTIFIED MAIL NO. 7018 2290 0001 3235 6948
RETURN RECEIPT REQUESTED

U.S. Environmental Protection Agency
Director, Air Enforcement Division
Office of Regulatory Enforcement
Ariel Rios Building, Mail Code 2242-A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
CERTIFIED MAIL NO. 7018 2290 0001 3235 6955
RETURN RECEIPT REQUESTED

Chief
Chemical Accident Enforcement Section (ECDAD)
Air Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency -Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270-2102
CERTIFIED MAIL NO. 7018 2290 0001 3235 6962
RETURN RECEIPT REQUESTED

Re: Notification of Potential Force Majeure Event and Request for Enforcement Discretion as a Result of COVID-19 for ExxonMobil Beaumont Facilities

Pursuant to Paragraph 218 of the Consent Decree ("CD") between the United States and Exxon Mobil Corporation and ExxonMobil Oil Corporation (collectively, "ExxonMobil"), entered on December 13, 2005, this letter provides notice that a potential force majeure event is anticipated to occur as a result of the global pandemic outbreak of Coronavirus Disease 2019 ("COVID-19"). This notification is being provided out of an abundance of caution to preserve all rights under the CD as the COVID-19 pandemic further develops. ExxonMobil continues to take diligent and prudent

actions to protect the health and safety of its workers, public and the environment, and to the meet market needs as the COVID-19 pandemic develops. However, this potential force majeure event is anticipated to impact the ability of the following ExxonMobil facilities to comply with various provisions of the CD, and state and federal air and water regulations, collectively referred to as the Beaumont Facilities:

ExxonMobil Beaumont Refinery (BMRF), RN No. 102450756
ExxonMobil Colonial Storage Facility, RN No. 102553336

The CD requires ExxonMobil to include certain CD requirements in the Title V operating permit. Thus, some of the potential compliance issues identified in this force majeure notice may also be potential noncompliance with the Title V operating permit. Similarly, many of the CD requirements relate to federal and state regulations. Some of the potential noncompliance issues identified might qualify for exemptions available for startup, shutdown, or malfunctions. This letter advises of potential federal air and water regulatory compliance issues under the CD, Title V permits, and federal rules and regulations, generally for the Beaumont Facilities. To the extent that exemptions do not apply to any such noncompliance or such issues are deemed to be outside the scope of this potential force majeure notice under the CD or other permit, rule, or regulation, ExxonMobil respectfully requests that EPA exercise enforcement discretion to not seek penalties or other enforcement action for potential noncompliance as a result of a reduced workforce from COVID-19 from the period of March 27, 2020 to June 30, 2020. This time period represents the potential impacts from COVID-19 to the anticipated return to normal operation of the Beaumont Facilities. This initial period may become extended depending on the nature and severity of the COVID-19 impacts over the next few months, and follow up notifications will be submitted to provide ongoing updates of actual compliance impacts. Please note that the Beaumont Refinery will request similar relief as appropriate from the Texas Commission on Environmental Quality (TCEQ) as issues arise.

The CD specifies a force majeure request must comply with the requirements of Article XIV of the CD and must describe the anticipated length of time the delay or impediment may persist, the cause or causes of the delay or impediment, and the measures taken or to be taken by ExxonMobil to prevent or minimize the delay or impediment and the schedule by which those measures shall be implemented. These elements are described below, organized by the respective impacted CD paragraph, along with a discussion of each element. Generally, the cause of the anticipated delay or impediment to performance is the reductions of staffing and available personnel due to COVID-19. ExxonMobil will provide follow-up communications as new issues are identified and to provide updates on identified potential issues.

COVID-19 and Its Impact

Explanation and Description of the Anticipated Delay or Impediment to Performance

COVID-19 affects the lungs and airways, with illnesses ranging from mild symptoms to severe illness and death.[1] The virus is highly communicable, remaining viable for hours to days on surfaces made

[1] "Symptoms," Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html (accessed March 16, 2020).

from a variety of materials.[2] The Centers for Disease Control and Prevention (CDC) itself has stated that "[m]uch is unknown about how the virus that causes COVID-19 spreads."[3] "Close contact" (within about 6 feet) is the most frequent spread from person-to-person.[4] There is no known treatment or vaccine for COVID-19.[5] The CDC states that "[t]he complete clinical picture with regard to COVID-19 is not fully known."[6] The agency stated that "[t]his is the first pandemic known to be caused by the emergence of a new coronavirus," and admitted that "this is a rapidly evolving situation."[7]

As the COVID-19 pandemic has developed and become more dire across the country, government entities and Non-Governmental Organizations (NGOs) have reacted with progressively more stringent recommendations and restrictions. On January 30, 2020, the International Health Regulations Emergency Committee of the World Health Organization (WHO) labeled the outbreak a "public health emergency of international concern."[8] On January 31, the U.S. Health and Human Services Department declared a public health emergency for international aid.[9] On March 11, the World Health Organization publicly declared COVID-19 as a pandemic, and on March 13, the President of the United States declared the outbreak a national emergency.[10] That same day, the Governor of the State of Texas issued a proclamation that COVID-19 poses an imminent threat of disaster, declaring a state of disaster for all counties in Texas.[11] The County Judge of Jefferson County declared a local disaster for public health emergency as well as a series of amended emergency

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[2] "Environmental Cleaning and Disinfection Recommendations," Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html (accessed March 16, 2020).

[3] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).

[4] "Environmental Cleaning and Disinfection Recommendations," Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html (accessed March 16, 2020).

[5] "Situation Summary, Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[6] "Situation Summary, Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[7] "Situation Summary, Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[8] "Situation Summary, Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[9] "Situation Summary, Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[10] "Situation Summary, Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[11] "Governor Abbott Declares State of Disaster in Texas Due to COVID-19", Office of the Texas Governor, https://gov.texas.gov/news/post/governor-abbott-declares-state-of-disaster-in-texas-due-to-covid-19 (accessed March 16, 2020).

orders progressively restricting condensed population events.[12] The Mayor of Beaumont declared an emergency due to the public health emergency.[13] Local organizations responded swiftly, as the local university moved all classes online for the remainder of the semester,[14] virtually all Jefferson County schools closed,[15] and even places of worship moved services online.[16]

As the Occupational and Safety Health Administration (OSHA) acknowledges, COVID-19 renders wide impacts on absenteeism based on illness, caregiving for sick or the at-risk, and caregiving for school closures.[17] Interrupted supply lines may also cause severe impacts.[18] OSHA specifically recommended flexible telecommuting where possible.[19] OSHA also encouraged minimizing contact among workers, and establishing a reduction in the total number of employees in a facility at a given time, "allowing them to maintain distance from one another..."[20] Eventually, the CDC recommended that in-person community events of fifty (50) people or more be postponed or cancelled, with a subsequent recommendation by the White House that in-person events of ten (10) people or more be canceled or postponed between March 16-30.[21]

The CDC states that "[a]ll employers need to consider how best to decrease the spread of acute respiratory illness and lower the impact of COVID-19 in their workplace..."[22] The Beaumont Facilities have taken and continue to take cautious and reasonable steps to prepare for any COVID-19 impact. The Beaumont Facilities exceeded the cleaning and disinfection recommendations of the CDC for

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[12] "Coronavirus COVID-19 Related Documents and Declarations," Jefferson County, https://co.jefferson.tx.us/documents/Coronavirus%20Docs/coronavirusdocs.htm (accessed March 16, 2020).

[13] "City of Beaumont Disaster Declaration," 12 News Now, https://www.12newsnow.com/article/news/health/coronavirus/city-of-beaumont-issues-disaster-declaration/502-5cc4fee5-fbab-4477-84ed-18dc750bfa12 (accessed March 17, 2020).

[14] "LIT moves classes online, cancels travel," Isaac Windes, Beaumont Enterprise, https://www.beaumontenterprise.com/news/article/LIT-moves-classes-online-cancels-travel-15127843.php (accessed March 16, 2020).

[15] "Nederland-PNG districts to close through March 15," Beaumont Enterprise, https://www.beaumontenterprise.com/news/article/Nederland-PN-G-districts-to-close-through-March-15133095.php (March 16, 2020); "Hamshire Fannett to Close Campuses this Week," Beaumont Enterprise, https://www.beaumontenterprise.com/news/article/Hamshire-Fannett-to-close-campuses-this-week-15133512.php (accessed March 16, 2020); "Tekoa Academy Closes Doors due to Coronavirus," Beaumont Enterprise, https://www.beaumontenterprise.com/news/article/Hamshire-Fannett-to-close-campuses-this-week-15133512.php (accessed March 16, 2020).

[16] "Sermons go digital as coronavirus intrudes on church hour," Beaumont Enterprise, https://www.beaumontenterprise.com/news/article/Sermons-go-digital-as-coronavirus-intrudes-on-15132944.php (accessed March 16, 2020).

[17] "Guidance on Preparing Workplaces for COVID-19," Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

[18] "Guidance on Preparing Workplaces for COVID-19," Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

[19] "Guidance on Preparing Workplaces for COVID-19," Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

[20] "Guidance on Preparing Workplaces for COVID-19," Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

[21] "Get Your Mass Gatherings or Large Community Events Ready," Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/large-events/mass-gatherings-ready-for-covid-19.html (accessed March 16, 2020).

[22] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).

weeks prior to any confirmed case in Beaumont or Jefferson County,[23] and is following established recommendations to avoid spread of the illness.[24]

The Beaumont Facilities carefully established essential personnel plans in place. On March 16, all ExxonMobil Beaumont Area Facilities (including the Refinery, Colonial Storage, Chemical Plant, Polyethylene Plant, and other facilities) transitioned to "Hot Standby Phase" of its plan, taking steps to facilitate further social distancing and leveraging alternative work locations by going to "essential personnel" only.

However, as the CDC acknowledges, those plans must be "flexible" given the uncertainties related to the disease and possible community impacts.[25] When planning, the CDC recommended considering factors including:

- The overall number of attendees (*Beaumont Facilities have approximately 1125 employees and hundreds of contractors)*;
- The number of people attending who are at greater risk of more serious illness after contracting COVID-19 *(Beaumont facilities employs vulnerable employees)*;
- The density of attendees within a confined area *(Beaumont facilities' normal operations require work within confined areas)*;
- The potential economic impact to participants, attendees, staff, and the larger community *(ExxonMobil Beaumont Area Facilities directly or indirectly generate jobs for 1 out of 7 employees in Jefferson County)*;
- The level of transmission in your local community, and the level of transmission in the areas from which your attendees will travel (*Jefferson County, Texas currently has reported thirteen (13) confirmed cases of COVID-19, and ExxonMobil is a global company)*; and
- If there are ways in which to significantly reduce the number of attendees.[26]

ExxonMobil has carefully considered ways in which to significantly reduce the number of onsite personnel while still meeting regulatory obligations. The actions taken at Beaumont Facilities to date have been reasonable and prudent while balancing regulatory obligations and maintaining the health and safety of its workers and the public. Measures taken at Beaumont Facilities include proactively reinforcing social distancing (including reducing the number of non-essential employees working on-site at Beaumont Facilities) limiting exposure of essential personnel to outside persons, and implementing the use of virtual meetings. Personnel were additionally asked to self-monitor for symptoms, including taking temperature twice daily, and to self-quarantine if the employee or contractor had symptoms of COVID-19, has come in contact with a person with COVID-19, or has recently travelled to an area with sustained COVID-19 transmission. Additionally, due to the impacts

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[23] "Environmental Cleaning and Disinfection Recommendations," Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html (accessed March 16, 2020).
[24] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).
[25] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).
[26] Get Your Mass Gatherings or Large Community Events Ready," Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/large-events/mass-gatherings-ready-for-covid-19.html (accessed March 16, 2020).

of COVID-19, schools in the local area have temporarily closed until further notice which caused many employee's children to be at home during the day. In order to enable on-site presence of essential personnel to maintain safe operations of the Beaumont Facilities, ExxonMobil has offered a backup care advantage program to assist qualifying employees with finding child care. Unfortunately, future developments may impair the ability to fulfill all requirements. Due to what all federal and state agencies acknowledge to be a rapidly evolving and unknown progression of the disease in the public, the Beaumont Facilities respectfully provide notice that the following may be potential impacts arising from the disease beyond the control of ExxonMobil, despite the exercise of due diligence and all reasonable steps to avoid or minimize delays or impediments to performance.

Schedule for Mitigating the Delay or Impediments to Performance

ExxonMobil anticipates that the Beaumont Facilities will be able to resume normal staffing of the facilities and return to normal work arrangements beginning no later than June 30, 2020. However, due to the uncertainty associated with the rapidly evolving developments of COVID-19, the actual length of time where delays or impediments are felt may be different than originally anticipated. While following recommendations of CDC and OSHA, and monitoring the community and greater effects of COVID-19, ExxonMobil will make all diligent efforts to protect the health of its employees to maintain safe operation, and to return to normal operations as soon as practical. Updates to the exact timing of resuming normal operations will be included in a follow-up to this letter.

Potential Impacted Issues

As a result of the above-described situation, ExxonMobil believes the expected impact of COVID-19 on the Beaumont Facilities qualifies as a force majeure event as described in Paragraph 218 of the CD. In addition, to the extent that the effects of this pandemic impact the ability of the Beaumont Facilities to comply with federal air and water regulations, ExxonMobil respectfully requests enforcement discretion during this event for the following enumerated areas for the period from March 27, 2020 through June 30, 2020. This time period represents the anticipated potential impacts from COVID-19 to our current best estimate of a return to normal operation.

The following list identifies an initial set of potential exceedances and compliance issues at the Beaumont Facilities that would most likely occur in the initial phases of COVID-19 response, along with the anticipated impact time period. It is important to note that most are primarily administrative delays or adjustment to activities which are expected to have minimal to no emissions or environmental impact if any. ExxonMobil's requests and contingency responses are consistent with the March 26, 2020 guidance memo provided by the EPA ("COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program"), and are reasonable and environmentally protective in light of the pandemic impacts acknowledged by EPA's guidance memo.[27] Site emission control and treatment devices and systems remain operational at this time consistent with CD and other regulatory obligations:

[27] "COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program," Environmental Protection Agency, https://www.epa.gov/coronavirus (accessed March 26, 2020).

March 27, 2020
Notification of Force Majeure Event and Request for Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Beaumont Facilities

1. Leak Detection and Repair (Paragraphs 123 – 130; and other federal regulations requiring the use of Method 21 to monitor fugitive emissions)

   The ExxonMobil Beaumont Facilities anticipate that some monitoring and/or repair on some components may not be completed or delayed due to COVID-19, and that it may not be possible to complete fugitive emissions monitoring, including daily rounds for audio, visual and olfactory (AVO) testing, and repair on some components for which monitoring and repair is required. ExxonMobil will continue to conduct all required monitoring and repairs to best of its ability.

   If qualified personnel availability is reduced due to COVID-19 impacts and infection rates, alternative monitoring approaches will be evaluated with state and federal agencies. Alternatives might include Optical Gas Imaging (OGI) camera monitoring, FLIR (Infrared) cameras, smaller monitoring crews, etc. Those approaches are yet to be determined. This alternate process would use a relaxed recordkeeping requirement by only recording leaks found and subsequent leak repairs.

   ExxonMobil currently anticipates maintaining the fence line monitoring program to maximum extent possible under the pandemic to ensure any impacts for LDAR monitoring delays would be readily detected. It is possible the effects of COVID-19 will impede ExxonMobil from being able to meet its obligation for Fenceline Monitoring as outlined in CD Paragraph 48 and CD Appendix 2.2.

2. Benzene Waste NESHAP (NSR CD Paragraphs 98, 102, 109, and 110; and 40 CFR 63 Subpart FF Benzene Waste NESHAP)

   Beaumont Refinery currently continues efforts to comply with the appropriate inspection, sampling, monitoring, and repair requirements of the Benzene Waste NESHAP regulation in 40 CFR Part 61, Subpart FF. ExxonMobil's intent is to continue to complete these requirements; however, it is possible that the required qualified support personnel will not be available due to the spreading effects of COVID-19 which may result in missing requirements.

   Beaumont Refinery also currently continues efforts to complete sampling as directed by Paragraph 109 of the CD. ExxonMobil's intent is to continue to complete the scheduled sampling. However, it is possible that the required qualified support personnel will not be available due to the spreading effects of COVID-19 which may result in missing required sampling.

   Similarly, ExxonMobil Beaumont Refinery currently continues efforts to complete inspections and / or repairs as required. ExxonMobil's intent is to continue to complete the inspections and / or repairs. However, it is possible that the required qualified support personnel will not be available due to the spreading effects of COVID-19 which may result in missing required inspections and / or repairs.

3. Continuous Emissions Monitoring Systems (CEMS) or Continued Parameter Monitoring System (CPMS) (NSR CD Paragraphs 21, 32, 42, 54, 64.b, and 73; 40 CFR Appendices and 40 CFR 75; and other federal regulations requiring continuous monitoring)

   Beaumont Refinery is required to maintain Continuous Emission Monitoring Systems (CEMS) on various equipment within the plant. Maintenance of the CEMS includes daily and weekly validations, quarterly calibration gas audits (CGAs) or linearities, annual relative accuracy test audits (RATAs), regular stack tests of impacted equipment, and maintaining CEMS uptime greater than 95% of total operating time. Although ExxonMobil currently continues to operate and maintain all impacted CEMS according to the requirements outlined in the BMRF operating permits, it is possible that limited qualified personnel due to COVID-19 may restrict the ability of ExxonMobil to properly repair and/or maintain the CEMS systems in order to meet CEMS uptime requirements. These potential impacts on qualified personnel due to COVID-19 may also result in late CGAs or linearities. The next scheduled RATA is to be completed by June 30, 2020. At this time, ExxonMobil Beaumont Refinery does not anticipate any concerns with meeting the upcoming RATA requirements. However, it is possible that with the spreading of COVID-19, limited qualified resources may be available to complete.

   If there is a specific QA/QC/Performance Test which cannot be performed due to lack of vendor availability, ExxonMobil will evaluate if the operating parameters of the emission control device and/or monitoring equipment indicate a degradation in performance to ensure monitoring of emissions limitations.

4. Reporting Requirements –Semi-Annual Reports [CD Paragraph 161]

   Beaumont Refinery is required to submit certain reports to the EPA, including the Semi-Annual report, due every six months. Although ExxonMobil currently anticipates that these reports will be ready and submitted in a timely manner consistent with Consent Decree requirements, it is possible that on-going effects of COVID-19 may reduce qualified personnel able to compile and review these reports despite best efforts to complete the reports accurately and in a timely manner. ExxonMobil will use best efforts to complete the reports for submittal using the best information and personnel available but reserves the right to update with additional information once personnel return. Any expected delay to the completion of these reports will be included in a follow-up letter to the EPA.

5. Compliance with Title V Permit Conditions and Other Federal Regulatory Requirements

   - Fence line Monitoring Tube Deployment/Retrieval and Sample Result Postings (MACT CC 40 C.F.R. 63.659)
     For the Refinery, fence line monitoring is a requirement of MACT CC to maintain and to collect samples from 26 passive benzene monitors located around the fence line of the facility. ExxonMobil will make every reasonable effort to maintain the sample stations, collect the samples, process them in a timely manner, and complete quarterly posting. It is possible that with the effects of COVID-19, ExxonMobil will not be able to meet its obligation requirements for fence line monitoring.

- Hazardous Waste Management (40 CFR 260 – 280 and 30 TAC 335)
  Beaumont Refinery is applicable to RCRA federal and state requirements which regulate how hazardous waste is managed on-site prior to being accepted at a transportation, storage, and disposal facility (TSDF). Hazardous waste is applicable to specific management requirements at the facility, including temporary storage in on-site containers, inspections of waste containers and storage areas, sampling, analysis of sample results and subsequent waste classification, scheduling disposal with a vendor who meets all requirements, and transportation by qualified personnel. Management of hazardous waste requires qualified personnel and facilities; spreading impacts of COVID-19 may impact the availability of trained personnel and qualified facilities to complete each of these tasks in order to ship hazardous waste to a TSDF within 90 days. Required site inspections of containers and storage areas could be delayed due to lack of available qualified personnel. Additionally, if contract labs are impacted by COVID-19 and are unable to provide timely analysis of collected samples, delays or potentially missed holding times may be experienced.

  ExxonMobil will continue to make best efforts to manage hazardous wastes according to regulatory requirements, and expedite shipments to meet current 90-day onsite retention requirements. However, if shipping firms do not have the necessary drivers for transportation, or if disposal facilities are closed, then sites will retain wastes on-site until next available opportunity to ship the wastes. Agency notification of any waste shipment delays will happen concurrent with site response.

- Corrective Action Program (30 TAC 335.166), Compliance Monitoring Program (30 TAC 335.165) and Detection Monitoring Program (30 TAC 335.164)
  Beaumont Refinery is applicable to Hazardous Waste Permit No. 50139 (Permit) for a permit for Industrial Solid Waste Management Site issued under provisions of Texas Health and safety Code ANN. Compliance with the Corrective Action Program, Compliance Monitoring Program and Detection Monitoring Program requires qualified personnel and facilities; spreading impacts of COVID-19 may impact the availability of trained personnel and facilities to complete site tasks within specified deadlines set forth in the Permit and those made by the TCEQ. Additionally, if contract labs are impacted by COVID-19 and are unable to provide timely analysis of collected samples, delays or potentially missed holding times may be experienced.

  ExxonMobil will continue to make best efforts to manage environmental monitoring and assessment according to regulatory requirements. However, if consultants do not have the necessary qualified personnel to perform groundwater monitoring, assessment or reporting, then these activities will be completed at the next available opportunity. Agency notification of any delays will happen concurrent with site response.

- Regulatory Reporting (State and Federal Regulations)
  ExxonMobil is required to send regular reports to state and federal agencies for requirements to which it is subject. These reports require significant effort and coordination across the site by qualified personnel to complete the reports accurately and in a timely manner. Although ExxonMobil will use best efforts to complete all required federal and state reporting requirements, it is possible that due to absenteeism and other personnel impacts from the

COVID-19 pandemic may inhibit the ability of ExxonMobil to provide reports according to the desired timeline. Should reports be delayed, this information will be communicated to the applicable parties, as well as in a follow-up letter.

- Delays in conducting inspections, sampling, monitoring, recordkeeping, emissions testing, and submitting reports, as is required by 30 TAC 122 (Title V) and 40 CFR Part 60, 61, 63, 68 and 75.

  ExxonMobil will use best efforts to complete the reports for submittal using the best information and personnel available but reserves the right to update with additional information once full personnel return.

- OSHA PSM and EPA RMP regulations

OSHA PSM	EPA RMP	Activity
29 CFR 1910.119(j)(4)	40 CFR 68.73	-Documentation of training compliance may be delayed during COVID-19 staffing due to inability to access database / intranet remotely and/or personnel absenteeism. -Inspection and testing frequency may need to be extended to account for reduced staff (absenteeism due to illness or due to measures taken to reduce the spread of illness). -Timeliness of deficiency mitigation may be compromised due to reduced staff (absenteeism due to illness or due to measures taken to reduce the spread of illness). -In the event that inspections or mitigation steps need to be extended, appropriate risk assessment protocols will be followed to document deferral decision.
29 CFR 1910.119(e)(6)	40 CFR 68.67 (f)	-Unit PHA may be delayed beyond the required 5 year update due to reduced staff (absenteeism due to illness or due to measures taken to reduce the spread of illness).
29 CFR 1910.119(g)(2)	40 CFR 68.71(b)	-3 year refresher training may go overdue due to inability to access database / internet remotely and/or absenteeism. Once COVID impacts are mitigated and personnel restrictions relieved, refresher training would be completed as soon as reasonably practical.

At this time, ExxonMobil has not noted any additional regulatory compliance concerns from the standards enumerated in the Consent Decree or other applicable regulations at ExxonMobil Beaumont Refinery. It is possible that with the spreading and widening impact of the COVID-19 pandemic that additional concerns and/or noncompliance may occur, despite the best efforts of ExxonMobil to maintain safe, reliable, and compliant operations. All reasonable efforts will be made by ExxonMobil to ensure compliance with the Consent Decree and other applicable federal and state regulations and permits, and will make best efforts to complete the requirements in an expeditious fashion should undesired delays or impediments occur due to COVID-19. Although ExxonMobil does

not currently anticipate compliance concerns outside of those previously listed, ExxonMobil reserves the right to identify additional incidents to which Force Majeure applies, and will provide updates to the EPA in a follow-up letter.

All reporting on the above items will be performed as specified in the CD or in applicable regulations and/or Title V reports. In addition, ExxonMobil will report excess emissions resulting from this situation in the next CD Semi-Annual Report and in other reports as required by federal air regulations.

Within 30 days of the mailing of this letter, a follow-up letter will be sent out to provide an update of any impacts and the recovery of the Beaumont Area Facilities from COVID-19. Additional updates will be provided throughout the duration of the pandemic period. If you have any questions or concerns about this notice, please contact Stephen Codoluto at (409) 240-3279 or beaumont.env.admin@exxonmobil.com.

Sincerely,

3-27-20

David M. Gorsich
Beaumont Complex SSHE Manager

vms

cc:
Director, Air Enforcement Division
Office of Regulatory Enforcement
c/o Matrix New World Engineering, Inc.
120 Eagle Rock Ave., Suite 207
East Hanover, NJ 07936
CERTIFIED MAIL NO. 7018 2290 0001 3235 6979
RETURN RECEIPT REQUESTED

Mr. Andrew Wheeler
Environmental Protection Agency Administrator
EPA Administrator Mail Code 1101A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7018 2290 0001 3235 6986
RETURN RECEIPT REQUESTED

March 27, 2020
Notification of Force Majeure Event and Request for Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Beaumont Facilities

Mr. Lawrence Starfield
Environmental Protection Agency Acting Assistant Administrator
Air Enforcement Division Director Mail Code 2201A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7018 2290 0001 3235 6993
RETURN RECEIPT REQUESTED

Mr. Michael Shapiro
Environmental Protection Agency Acting Assistant Administrator
EPA Office of Water, Mail Code 1101A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7018 2290 0001 3235 7006
RETURN RECEIPT REQUESTED

Mr. Ken McQueen
Environmental Protection Agency Region 6 Regional Administrator
1201 Elm Street, Suite 500
Dallas, TX 75270
CERTIFIED MAIL NO. 7018 2290 0001 3235 7013
RETURN RECEIPT REQUESTED

Mr. Toby Baker
Executive Director
Texas Commission on Environmental Quality
P.O. Box 13087, MC-109
Austin, TX 78711-3087
CERTIFIED MAIL NO. 7018 2290 0001 3235 7020
RETURN RECEIPT REQUESTED

Texas Commission on Environmental Quality Region 10
3870 Eastex Fwy
Beaumont, TX 77703-1830
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Message

From: Stone, Randall (ENRD) [Randall.Stone@usdoj.gov]
Sent: 5/1/2020 8:46:44 PM
To: jeffrey.k.kovacs@exxonmobil.com; meagan.d.bowman@exxonmobil.com
CC: Lannen, Justin [Lannen.Justin@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Larson, Darrin [Larson.Darrin@epa.gov]; Spina, Providence [Spina.Providence@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]; Susan.akers@usdoj.gov
Subject: Attached letter response to April 8, 2020, Notification of Force Majeure Event and Request for Enforcement Discretion for the ExxonMobil Baytown Refinery
Attachments: May 1 Letter Response to Baytown FM notice.pdf; Exxon BTRF CD Force Majeure Notice Letter COVID19 4.8.20 (002).pdf

Randall M. Stone
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U.S. Department of Justice
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Exxon Mobil Corporation
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Baytown, Texas 77522-4004

ExxonMobil

April 8, 2020

Chief
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, DC 20044-7611
Reference Case No. 90-5-2-1-07030
CERTIFIED MAIL NO. 7019 1120 0001 9502 4116
RETURN RECEIPT REQUESTED

Director
Air Enforcement Division
Office of Regulatory Enforcement
U.S. Environmental Protection Agency
Ariel Rios Building, Mail Code 2242-A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 1120 0001 9502 4123
RETURN RECEIPT REQUESTED

Chief
Chemical Accident Enforcement Section (ECDAD)
Air Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency - Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270-2102
CERTIFIED MAIL NO. 7019 1120 0001 9502 4130
RETURN RECEIPT REQUESTED

Re: Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Baytown Refinery

Dear Sirs and Madams:

Pursuant to Paragraph 218 of the Consent Decree ("CD") between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, entered on December 13, 2005, this letter provides notice that a force majeure event as described in Paragraph 218 of the CD (herein, "Force Majeure") ***may potentially occur*** as a result of the global

pandemic outbreak of Coronavirus Disease 2019 ("COVID-19"). ***This notification is being provided out of an abundance of caution to preserve all rights under the CD as the COVID-19 pandemic further develops.*** ExxonMobil continues to take diligent and prudent actions to protect the health and safety of its workers, the public and the environment, and to meet market needs as the COVID-19 pandemic develops. However, this potential Force Majeure event may impact the ability of the ExxonMobil Baytown Refinery ("Baytown Refinery") to comply with various provisions of the CD, as well as federal air, water and/or waste regulations.

The CD requires ExxonMobil to include certain CD requirements in the Title V operating permit. Thus, some of the potential compliance issues identified in this Force Majeure notification may also be potential noncompliance with the Title V operating permit. Similarly, many of the CD requirements relate to federal regulations. This letter advises of potential federal air, water and waste regulatory compliance issues under the CD or other permit(s), and/or federal rules and regulations, generally for the Baytown Refinery. To the extent that exemptions do not apply to any such noncompliance or such issues are deemed to be outside the scope of this notification of potential Force Majeure under the CD or other permit(s), and/or federal rules and regulations, ExxonMobil respectfully requests that EPA exercise enforcement discretion to not seek penalties or other enforcement action for potential noncompliance as a result of a reduced workforce from COVID-19 from the period of **April 8, 2020 to June 30, 2020. This initial period may become extended depending on the nature and severity of the COVID-19 impacts over the next few months, and follow-up notifications will be submitted to provide ongoing updates of any actual compliance impacts.** Please note that should potential compliance issues with state regulatory requirements and/or federal regulatory requirements delegated to the state arise due to COVID-19 impacts, the Baytown Refinery will request enforcement discretion, as appropriate, from the Texas Commission on Environmental Quality (TCEQ).

The CD specifies that a Force Majeure request must comply with the requirements of Article XIV of the CD and must describe the anticipated length of time the delay or impediment may persist, the cause or causes of the delay or impediment, and the measures taken or to be taken by ExxonMobil to prevent or minimize the delay or impediment and the schedule by which those measures shall be implemented. These elements are described below, organized by the respective potentially impacted CD paragraph, along with a discussion of each element. Generally, the cause of the potential delay or impediment to performance is the reduction of staffing and available personnel due to COVID-19. Currently the Baytown Refinery is operational, but COVID-19 has led to changes to normal practices, including implementing measures to reduce worker interactions and additional vulnerabilities as a result of COVID-19.

COVID-19 and Its Impact

Explanation and Description of the Potential Delay or Impediment to Performance

COVID-19 affects the lungs and airways, with illnesses ranging from mild symptoms to severe illness and death.[1] The virus is highly communicable, remaining viable for hours to days on surfaces made

[1] "Symptoms", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html (accessed March 16, 2020).

from a variety of materials.[2] The Centers for Disease Control and Prevention ("CDC") itself has stated that "[m]uch is unknown about how the virus that causes COVID-19 spreads."[3] "Close contact" (within about 6 feet) is the most frequent spread from person-to-person.[4] There is no known treatment or vaccine for COVID-19.[5] The CDC states that "[t]he complete clinical picture with regard to COVID-19 is not fully known."[6] The agency stated that "[t]his is the first pandemic known to be caused by the emergence of a new coronavirus," and admitted that "this is a rapidly evolving situation."[7]

As the COVID-19 pandemic has developed and become more dire across the country, government entities and Non-Governmental Organizations ("NGOs") have reacted with progressively more stringent recommendations and restrictions. On January 30, 2020, the International Health Regulations Emergency Committee of the World Health Organization ("WHO") labeled the outbreak a "public health emergency of international concern."[8] On January 31, the U.S. Health and Human Services Department declared a public health emergency for international aid.[9] On March 11, the WHO publicly declared COVID-19 as a pandemic. That same day, the Houston Mayor and County Judge of Harris County signed a proclamation declaring a Local State of Disaster Due to a Public Health Emergency in Houston and Harris County, respectively.[10] On March 13, the President of the United States declared the outbreak a national emergency.[11] That same day, the Governor of the State of Texas issued a proclamation that COVID-19 poses an imminent threat of disaster, declaring

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[2] "Environmental Cleaning and Disinfection Recommendations", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html (accessed March 16, 2020).

[3] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).

[4] "Environmental Cleaning and Disinfection Recommendations", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html (accessed March 16, 2020).

[5] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[6] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[7] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[8] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[9] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[10] "Mayor Sylvester Turner and Harris County Judge Lina Hidalgo Declare Public Health Emergency Due to COVID-19", Mayor's Office Press Release, http://houstontx.gov/mayor/press/2020/public-health-emergency-declared-covid-19.html (accessed March 23, 2020)

[11] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

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a state of disaster for all counties in Texas.[12] On March 24, the County Judge of Harris County issued a Stay Home, Work Safe Order effective as of 11:59 p.m. on March 24.[13] Finally, on March 31, the Governor of the State of Texas issued Executive Order GA 14, directing a state-wide order effective at 12:01 a.m. on April 2 through April 30, 2020 to "minimize social gatherings and minimize in-person contact with" non-household members except where necessary to provide or obtain essential services.[14]

As the Occupational Safety and Health Administration ("OSHA") acknowledges, COVID-19 renders wide impacts on absenteeism based on illness, caregiving for sick or the at-risk, and caregiving for school closures.[15] Interrupted supply lines may also cause severe impacts.[16] OSHA specifically recommended flexible telecommuting where possible.[17] OSHA also encouraged minimizing contact among workers, and establishing a reduction in the total number of employees in a facility at a given time, "allowing them to maintain distance from one another..."[18] Eventually, the CDC recommended that in-person community events of fifty (50) people or more be postponed or cancelled, with a subsequent recommendation by the White House that in-person events of ten (10) people or more be cancelled or postponed between March 16-30[19], currently extended through April 30.

The CDC states that "[a]ll employers need to consider how best to decrease the spread of acute respiratory illness and lower the impact of COVID-19 in their workplace..."[20] The Baytown Refinery has taken and continues to take cautious and reasonable steps to prepare for any COVID-19 impact. The Baytown Refinery followed the cleaning and disinfection recommendations of the CDC for weeks prior to any confirmed case in Baytown or Harris County.[21] The Baytown Refinery also followed established recommendations to avoid the spread of the illness.[22]

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[12] "Governor Abbott Declares State of Disaster in Texas Due to COVID-19", Office of the Texas Governor, https://gov.texas.gov/news/post/governor-abbott-declares-state-of-disaster-in-texas-due-to-covid-19 (accessed March 16, 2020).

[13] "Stay Home, Work Safe", Order of County Judge Lina Hidalgo, https://www.houston.org/news/harris-county-issues-mandatory-stay-home-work-safe-order (accessed March 26, 2020).

[14] "Executive Order GA 14", https://gov.texas.gov/uploads/files/press/EO-GA 14_Statewide_Essential_Service_and_Activity_COVID-19_IMAGE_03-31-2020.pdf (accessed April 2, 2020).

[15] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

[16] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

[17] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

[18] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

[19] "Get Your Mass Gatherings or Large Community Events Ready", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/large-events/mass-gatherings-ready-for-covid-19.html (accessed March 16, 2020).

[20] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).

[21] "Environmental Cleaning and Disinfection Recommendations", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html (accessed March 16, 2020).

[22] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).

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The Baytown Refinery has carefully established essential personnel plans. On March 13, the Baytown Refinery transitioned to the "Hot Standby Phase" of its plan, taking steps to facilitate further social distancing and leveraging alternative work locations by shifting operations to "essential personnel" only.

However, as the CDC acknowledges, those plans must be "flexible" given the uncertainties related to the disease and possible community impacts.[23] When planning, the CDC recommended considering factors including:

- The overall number of attendees (*Baytown Refinery employs a workforce of approximately 1,500 employees and also utilizes independent contractors)*;
- The number of people attending who are at greater risk of more serious illness after contracting COVID-19 *(Baytown Refinery employs vulnerable employees)*;
- The density of attendees within a confined area *(Baytown Refinery normal operations require work within confined areas)*;
- The potential economic impact to participants, attendees, staff, and the larger community;
- The level of transmission in your local community, and the level of transmission in the areas from which your attendees will travel (*ExxonMobil is a global company)*; and
- If there are ways in which to significantly reduce the number of attendees.[24]

The Baytown Refinery has carefully considered ways in which to significantly reduce the number of on-site personnel while still meeting regulatory obligations. The actions taken by the Baytown Refinery to date have been reasonable and prudent while balancing regulatory obligations and maintaining the health and safety of its workers and the public.

Measures taken at the Baytown Refinery include reducing the number of non-essential employees working on-site to limit exposure of essential personnel to outside persons, proactively reinforcing social distancing and implementing the use of virtual meetings. Personnel were also asked to self-monitor for symptoms; and to self-quarantine if the employee or contractor experienced symptoms of COVID-19, has come in contact with a person with COVID-19, or recently travelled to an area with sustained COVID-19 transmission. In addition, ExxonMobil offered assistance to qualifying employees with childcare needs during school closures to enable on-site presence of essential personnel to maintain safe operations at the Baytown Refinery.

Unfortunately, future developments may impair the ability to fulfill all requirements. Due to what federal and state agencies acknowledge to be a rapidly evolving and unknown progression of the disease in the public, the Baytown Refinery respectfully provides notice that the enclosed may be potential impacts arising from the disease beyond the control of ExxonMobil, despite the exercise of due diligence and all reasonable steps to avoid or minimize delays or impediments to performance.

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[23] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).
[24] Get Your Mass Gatherings or Large Community Events Ready," Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/large-events/mass-gatherings-ready-for-covid-19.html (accessed March 16, 2020).

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Schedule for Mitigating Potential Delays or Impediments to Performance
ExxonMobil anticipates that the Baytown Refinery will be able to resume normal staffing at the site and return to normal work arrangements/operations **beginning no later than June 30, 2020**. However, due to the uncertainty associated with the rapidly evolving developments of COVID-19, the actual length of time where potential delays or impediments are experienced may be different than originally anticipated. While following recommendations from the CDC and OSHA, and monitoring the community and greater effects of COVID-19, ExxonMobil will make all diligent efforts to protect the health of its employees to maintain safe operation, and to return to normal operations as soon as practical. Updates to the exact timing of resuming normal work arrangements/operations will be included in a follow-up to this letter.

Potential Impacted Issues

As a result of the above-described situation, ExxonMobil believes the expected potential impact of COVID-19 on the Baytown Refinery qualifies as a Force Majeure event as described in Paragraph 218 of the CD. In addition, to the extent that the effects of this pandemic impact the ability of the Baytown Refinery to comply with federal air, water and/or waste regulations, ExxonMobil requests enforcement discretion during this event for the following enumerated areas for the period from **April 8, 2020 through June 30, 2020**. This time period represents the commencement of potential impacts from COVID-19 to our current best estimate of a return to normal work arrangements/operations.

The following list identifies an initial set of potential compliance issues at the Baytown Refinery that may occur in the initial phases of COVID-19 response. ***It is important to note that these are primarily administrative delays or adjustments to activities which are expected to have minimal to no emissions or environmental impact.*** ExxonMobil's requests and contingency responses are consistent with the March 26, 2020 guidance memo provided by the EPA ("COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program"), and are reasonable and environmentally protective in light of the pandemic impacts acknowledged by EPA's guidance memo.[25] Site emission control and treatment devices and systems remain operational at this time consistent with CD and other federal regulatory obligations:

1. Leak Detection and Repair (CD Paragraphs 123 – 130; and other federal regulations with standards for equipment leaks and requiring fugitive emissions monitoring)

   The Baytown Refinery is currently required and able to complete fugitive emissions monitoring, including periodic rounds for audio, visual and olfactory ("AVO") testing, and repair on some components for which monitoring is required. The Baytown Refinery will continue to be operated in such a manner that all required monitoring and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed monitoring and/or repairs, including repair of components on Delay of Repair. These Delay of

[25] "COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program", Environmental Protection Agency, https://www.epa.gov/coronavirus (accessed March 26, 2020).

Repair components will be repaired or replaced during the next planned shutdown of the respective units.

If necessary as a result of personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness), alternative monitoring approaches will be evaluated with applicable federal agencies. Alternatives may include Optical Gas Imaging ("OGI") camera monitoring, smaller monitoring crews, etc.; however, these approaches are yet to be determined.

2. NESHAP for Benzene Waste Operations (CD Paragraphs 98, 102, 108, 110, 111 and 112; and 40 CFR 61 Subpart FF)

   The Baytown Refinery is currently required and able to complete inspection, monitoring, and repair of applicable equipment per the requirements in 40 CFR Part 61, Subpart FF, including monitoring and replacement of carbon canisters. The Baytown Refinery will continue to be operated in such a manner that all required inspections, monitoring and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed inspections, monitoring and/or repairs.

   The Baytown Refinery will pay particular attention to carbon absorption and treatment devices to ensure proper operations to meet emission and concentration limitations to the maximum extent practical. In most instances, missed or delayed inspections and/or monitoring would not indicate loss of control/treatment capability, but rather foregoing a routine verification step. Operational parameters and conditions provide adequate ability to achieve compliance with applicable standards in the absence of periodic inspections and/or monitoring.

3. Continuous Emissions Monitoring Systems ("CEMS") or Continuous Parameter Monitoring Systems ("CPMS") (CD Paragraphs 21, 32, 42, 54, 64.b, and 73); 40 CFR Part 60 Appendices; and other federal regulations requiring continuous monitoring)

   The Baytown Refinery is currently required and able to operate and maintain numerous CEMS and CPMS to demonstrate compliance with various federal requirements. Maintenance of the CEMS includes, but is not limited to, periodic validations, quarterly cylinder gas audits ("CGAs"), annual relative accuracy test audits ("RATAs"), periodic stack tests of associated equipment and/or maintaining CEMS uptime greater than 95% of total operating time. The Baytown Refinery will continue to be operated in such a manner so as to achieve proper operation and maintenance of each instrumentation system, including the completion of timely repairs to maintain minimal downtime on each system, to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed maintenance and/or repairs on these instrumentation systems. These disruptions may increase downtime on regulatory-required instrumentation systems, which may potentially lead to exceeding 5% of operating time, despite taking all reasonable steps to minimize downtime.

Additionally, if third party vendors are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to perform specific maintenance requirements, then the Baytown Refinery will evaluate if operating parameters associated with the applicable equipment and/or instrumentation system indicate a degradation in performance. This would entail all reasonable steps to allow the site to continue to operate with a good faith belief that emission standards are being met. If the evaluation indicates emission standards continue to be met, then the site will continue to operate the applicable equipment.

4. Compliance with Title V Permit Conditions and Other Federal Regulatory Requirements

- NSPS for Petroleum Refineries – Flare Monitoring (40 CFR 60 Subpart Ja)
  The Baytown Refinery is currently required and able to collect and analyze weekly manual samples that are collected to measure the total sulfur-to-H2S ratio of the gas discharged to the flare and evaluate adherence with the previously established 95-percent confidence interval. The Baytown Refinery will continue to be operated in such a manner that all required samples are collected and analyzed in a timely manner to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed sampling and/or analysis.

  Additionally, if third party shipping vendors and/or laboratories are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to transport collected samples or provide timely analysis of collected samples, respectively, delays or potentially missed holding times may be experienced that could impact weekly sample analysis.

  The Baytown Refinery will pay particular attention to H2S analyzers, total sulfur analyzers and other applicable process parameters to verify that the previously established total sulfur-to-H2S ratio is a valid parameter to estimate sulfur content and emissions for flaring events. Absent manual samples, sample data, analyzer data and/or process parameters would be used to make an appropriate engineering evaluation.

- Storage Vessels (40 CFR 60 Subparts K, Ka, and Kb; 40 CFR Parts 61 and 63)
  The Baytown Refinery is currently required and able to complete periodic inspections of storage vessels, with the potential for required repairs. The Baytown Refinery will continue to be operated in such a manner that all required inspections and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed inspections and/or repairs.

- Wastewater Systems (40 CFR 60 Subpart QQQ); and other federal regulations requiring periodic monitoring of wastewater systems
  The Baytown Refinery is currently required and able to complete periodic inspections of applicable equipment per the requirements in 40 CFR Part 60, Subpart QQQ. In addition, the Baytown Refinery is currently required and able to complete inspection, monitoring, and repair of applicable wastewater equipment per the requirements in other federal regulations (e.g., 40 CFR 63 Subpart G). The Baytown Refinery will continue to be operated in such a

manner that all required inspections and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed inspections and/or repairs.

- NESHAP from Petroleum Refineries – Fenceline Monitoring (40 CFR 63 Subpart CC)
  The Baytown Complex (including the Baytown Refinery) is currently required and able to maintain and to collect samples from 50 passive benzene monitors located around the fenceline of the Baytown Complex. The Baytown Refinery will continue to be operated in such a manner that sample stations are maintained, samples are collected and analyzed in a timely manner and quarterly reports are prepared and posted timely to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed sample collection, analysis and/or associated reporting.

  Additionally, if third party shipping vendors and/or laboratories are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to transport collected samples or provide timely analysis of collected samples, respectively, delays or potentially missed holding times may be experienced that could impact bi-weekly sample analysis.

- NESHAP from Petroleum Refineries – Heat Exchange Systems (40 CFR 63 Subpart CC); and other federal regulations requiring Heat Exchange System monitoring
  The Baytown Refinery is currently required and able to complete periodic monitoring of heat exchange systems that have one or more heat exchangers in organic hazardous air pollutant ("HAP") service, with the potential for required repairs. The Baytown Refinery will continue to be operated in such a manner that all required monitoring and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed monitoring and/or repairs.

- NESHAP for Boilers and Process Heaters (40 CFR 63 Subpart DDDDD)
  The Baytown Refinery is currently required and able to complete periodic boiler and process heater tune-ups. The Baytown Refinery will continue to be operated in such a manner that all required tune-ups are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed tune-ups.

- Federal Regulatory Reporting
  The Baytown Refinery is currently required and able to submit numerous periodic reports as required by applicable federal regulations. The Baytown Refinery will continue to be operated in such a manner that all required reports are accurately completed and submitted timely to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in delayed report submittals as significant effort and coordination across the site is required to complete the reports accurately and in a timely manner.

- Federal Monitoring, Testing and Recordkeeping Requirements
  The Baytown Refinery is currently required and able to complete periodic inspections, sampling, monitoring, testing, recordkeeping, etc. per the requirements in 40 CFR Parts 60, 61, 63 and 68. The Baytown Refinery will continue to be operated in such a manner that all required inspections, sampling, monitoring, testing, recordkeeping, etc. are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed inspections, sampling, monitoring, testing, recordkeeping, etc.

- Water Regulations (Water Operating Permits)
  The Baytown Refinery is currently required by the Texas Pollutant Discharge Elimination System (TPDES) permit and is able to conduct regular monitoring of treated effluent waste water and storm water discharge. The Baytown Refinery will continue to be operated in such a manner that all required sampling of waste water is completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed sampling and/or analysis.

  Additionally, if third party laboratories are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to provide timely analysis of collected samples, delays or potentially missed holding times may be experienced that could impact monthly Discharge Monitoring Report ("DMR") data.

- Hazardous Waste Management (40 CFR 260 – 280)
  The Baytown Refinery is currently required and able to manage hazardous waste per the applicable Resource Conservation and Recovery Act ("RCRA") federal requirements that regulate how hazardous waste is managed on-site prior to being accepted at a transportation, disposal, and storage facility ("TSDF"). Hazardous waste is subject to specific treatment at the Baytown Refinery, including temporary storage in on-site containers, sampling, analysis of sample results and subsequent waste classification, scheduling disposal with a third party who meets all requirements, and transportation by qualified personnel. The Baytown Refinery will continue to be operated in such a manner to achieve adequate handling of hazardous waste, including taking all reasonable steps to expedite shipments of wastes to meet current 90-day on-site retention requirements. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may impact the availability of qualified personnel to complete each of these tasks in order to ship hazardous waste to a TSDF within 90 days.

  Additionally, if third party shipping vendors are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to provide the necessary drivers for transportation or if approved disposal facilities are closed, then the Baytown Refinery may be required to retain wastes on-site until the next available opportunity to ship the wastes.

- Chemical Accident Prevention Provisions (40 CFR Part 68)
  The Baytown Refinery is currently required and able to comply with 40 CFR Part 68, commonly referred to as the Risk Management Program. The Baytown Refinery will continue

to be operated in such a manner that all applicable requirements are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in potential documentation issues and/or delays, as summarized in the table below:

Citation	Activity
40 CFR 68.73	- Documentation of training compliance may be impacted by the pandemic (either due to precautionary conditions or actual illness) due to inability to access database / intranet remotely - Inspection and testing frequency may be impacted by the pandemic (either due to precautionary conditions or actual illness), resulting in the need for potential extensions - Timeliness of deficiency mitigation may be impacted by the pandemic (either due to precautionary conditions or actual illness) In the event that inspections and/or mitigation steps require extension, appropriate risk assessment protocols will be followed to document the deferral decision.
40 CFR 68.67 (f)	- Unit Process Hazard Analyses ("PHAs") may be impacted by the pandemic (either due to precautionary conditions or actual illness), resulting in potential delays beyond the required 5 year update
40 CFR 68.71(b)	- 3-year refresher training may be impacted by the pandemic (either due to precautionary conditions or actual illness) due to inability to access database / intranet remotely. In the event that 3-year refresher training goes overdue, refresher training would be completed as expeditiously as possible following the return to normal work arrangements/operations.

Should any reporting be required associated with the above items in the event compliance is prevented by Force Majeure, it will be completed as required in the CD and/or in applicable federal regulations, including Title V.

As of the date of this letter, the Baytown Refinery has not noted any regulatory compliance issues with the standards enumerated in the CD or other applicable federal regulations and permits at the Baytown Refinery as a result of the impacts of COVID-19. It is possible that with the spreading and widening impacts of the COVID-19 pandemic that potential noncompliance may be identified, despite ExxonMobil taking all reasonable steps to maintain safe, reliable, and compliant operations. All reasonable efforts will be made by ExxonMobil to ensure compliance with the CD and other applicable federal regulations and permits, and ExxonMobil will take all reasonable steps to complete the requirements in an expeditious fashion should undesired delays or impediments occur due to the pandemic. Although ExxonMobil does not currently anticipate compliance impacts, ExxonMobil reserves the right to identify additional impacts to which Force Majeure may apply, and will provide updates to the EPA in a follow-up letter.

Within 30 days of the mailing of this letter, a follow-up letter will be submitted to provide an update on any impacts from the pandemic experienced by the Baytown Refinery. Additional updates will be

provided throughout the duration of the pandemic period, as needed. Should you have any questions or concerns regarding this submittal, please contact Meagan Bowman at (346) 259-2345 or meagan.d.bowman@exxonmobil.com.

Sincerely,

Jeffrey K. Kovacs, P.E.
Baytown Complex SSHE Manager

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May 1, 2020

BY ELECTRONIC MAIL

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Re: Force Majeure Notification Concerning the Baytown Refinery Under 2005 Consent Decree

Dear Sir and Madam:

We have received your letter of April 8, 2020, submitting a force majeure notice due to the impact of the novel coronavirus COVID-19. This letter will serve as the initial response on behalf of the United States pursuant to the Consent Decree entered in *United States v. Exxon Mobil Corp.*, No. 05-cv-5809 (N.D. Ill.).

Your letter states that it was sent "out of an abundance of caution" to give notice of a "potential Force Majeure event" that may give rise to "potential compliance issues." It discusses "an initial set of potential compliance issues at the Baytown Refinery that may occur in the initial phases of COVID-19 response." Your letter then notes that "it is possible" that the effects of COVID-19 may inhibit ExxonMobil's ability to satisfy some Consent Decree obligations relating to the Baytown Refinery's leak detection and repair program, Benzene Waste NESHAP compliance program, and continuous emissions monitoring systems and continuous parametric monitoring systems, as well as other obligations imposed by permits and regulations. However, your letter emphasizes that "***the Baytown Refinery has not noted any regulatory compliance issues with the standards enumerated in the CD or other applicable federal regulations and permits at the Baytown Refinery as a result of the impacts of COVID-19.***" Your letter concludes by saying:

Within 30 days of the mailing of this letter, a follow-up letter will be submitted to provide an update of any impacts from the pandemic experienced by the Baytown Refinery. Additional updates will be provided throughout the duration of the pandemic period, as needed.

We appreciate your notice under the Decree and your commitment that "[a]ll reasonable efforts will be made by ExxonMobil to ensure compliance with the CD and other applicable federal regulations and permits, and ExxonMobil will take all reasonable steps to complete the requirements in an expeditious fashion should undesired delays or impediments occur due to the pandemic." As you know, the Decree requires that ExxonMobil "take all reasonable steps" to maintain compliance with Decree requirements despite a force majeure event, including steps to "prevent or minimize" delays. Consent Decree ¶ 218. Please adhere to the force majeure provisions of the Decree to the extent you believe any delays in ExxonMobil's obligations are warranted. For any matters falling outside the scope of the Consent Decree, ExxonMobil should adhere to the guidance given in EPA's recent Memorandum entitled "COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program" (March 26, 2020), which is mentioned in your letter. *See* https://www.epa.gov/sites/production/files/2020-03/documents/oecamemooncovid19implications.pdf.

Because your notice does not identify specific obligations that ExxonMobil anticipates *will not be met* due to a potential force majeure event, the United States must defer judgment on ExxonMobil's force majeure claim at this time. For a force majeure claim to be ripe for consideration, ExxonMobil should identify particular obligation(s) that will be delayed by the asserted force majeure event, along with the specific information required by the force majeure section of the Decree. This may well require multiple notices, depending on the deadlines for different obligations and the effect of the event on those deadlines. We look forward to receiving the follow-up notifications with periodic updates promised by your letter. The United States' decision to defer judgment at this time should not be construed as acceptance of any potential noncompliance at the facility covered by the Decree.

Thank you for your attention to these matters. Please feel free to contact me to discuss any of these issues further.

Sincerely,

RANDALL STONE

Digitally signed by RANDALL STONE
Date: 2020.05.01 15:34:24 -04'00'

Randall M. Stone
Senior Attorney

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Copies (by email) to

Justin Lannen, EPA
Cheryl Barnett, EPA
Darrin Larson, EPA
Providence Spina, EPA
Gregory Fried, EPA

ED_004791B_00000154-00003

Message

From: Stone, Randall (ENRD) [Randall.Stone@usdoj.gov]
Sent: 5/13/2020 8:32:24 PM
To: david.m.gorsich@exxonmobil.com; beaumont.env.admin@exxonmobil.com
CC: Lannen, Justin [Lannen.Justin@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Larson, Darrin [Larson.Darrin@epa.gov]; Spina, Providence [Spina.Providence@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]; Susan.akers@usdoj.gov
Subject: Attached letter response to April 28, 2020, Follow-Up to Notification of Potential Force Majeure Event and Request for Enforcement Discretion for the ExxonMobil Beaumont Refinery
Attachments: ENV_ENFORCEMENT-_2915080v.pdf; May 13 Response to Beaumont Follow Up FM notification.pdf

Randall M. Stone
Senior Attorney
Environmental Enforcement Section
U.S. Department of Justice
Phone: (202) 514-1308
Mobile: (202) 532-3270
E-Mail: randall.stone@usdoj.gov

Stone, Randall

ExxonMobil
Fuels & Lubricants Company
PO Box 3311
Beaumont, Texas 77704-3311

ExxonMobil

April 28, 2020

U.S. DEPARTMENT OF JUSTICE
ENVIRONMENT AND NATURAL RESOURCES DIVISION
MAY 07 '20
EXECUTIVE OFFICE

Chief
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, DC 20044-7611
Reference Case No. 90-5-2-1-07030
CERTIFIED MAIL NO. 7019 0700 0001 4427 4794
RETURN RECEIPT REQUESTED

U.S. Environmental Protection Agency
Director, Air Enforcement Division
Office of Regulatory Enforcement
Ariel Rios Building, Mail Code 2242-A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 0700 0001 4427 4787
RETURN RECEIPT REQUESTED

Chief
Chemical Accident Enforcement Section (ECDAD)
Air Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency -Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270-2102
CERTIFIED MAIL NO. 7019 0700 0001 4427 4770
RETURN RECEIPT REQUESTED

Re: Follow-Up to Notification of Potential Force Majeure Event and Request for Enforcement Discretion as a Result of COVID-19 for ExxonMobil Beaumont Refinery

On March 27, 2020 ExxonMobil Beaumont Refinery submitted notification of potential force majeure events anticipated from the global pandemic outbreak of Coronavirus Disease 2019 ("COVID-19). In subsequent correspondence and communications, the agency has acknowledged receipt of those notifications and that potential impacts could result from COVID-19, but reserved judgment on force majeure claims until specific impacts to obligations were incurred. The agency also requested

Corr
90-5-2-1-07030

periodic updates (e.g., 30-day follow-ups) and additional notifications as sites identified COVID-19 impacts to their compliance obligations and/or activities.

Currently, ExxonMobil continues to take diligent and prudent actions to protect the health and safety of its workers, the public and the environment, and to meet market needs as the COVID-19 pandemic continues. With the exception of the item listed below, no new potential issues have arisen since our initial notification, and more importantly, ExxonMobil Beaumont Refinery has successfully been able to meet its compliance obligations under the Consent Decree. While there are promising developments in the global COVID-19 pandemic response, the situation remains quite fluid. ExxonMobil is faced with unprecedented challenges and constraints in refining, fuel, and chemical supply and demand chains as well as restrictions in personnel availability (i.e., stay at home orders, travel restrictions, illness, and exposure protection measures). As such, ExxonMobil still considers the potential force majeure an on-going situation and the initial notification still active.
As discussed in the initial notification, one of the primary areas likely to be affected from reduced personnel availability would be Leak Detection and Repair programs (Paragraph 123-130). In late March, the Beaumont Facilities began experiencing increasing numbers of LDAR Monitoring Technicians taking off work due to COVID-19 concerns. The Beaumont area facilities were able to complete first quarter monitoring by working overtime with the reduced crew, while being cautious to emphasize social distancing and hygiene guidance. In light of the various Texas counties stay at home orders and restrictions for interstate travelers, increasing local LDAR monitoring contractor safety concerns, and in an effort to help slow the local spread of COVID-19, the ExxonMobil Beaumont Facilities implemented a 14-day LDAR monitoring pause from April 1 to April 14 and asked the monitoring crews to stay at home. Since implementing the 14-day pause, Southeast Texas has continued to experience an upward trend of COVID cases. In addition to concerns listed above, a portion of the LDAR monitoring crews supporting the Beaumont Facilities reside in Louisiana, and must travel across the quarantined Texas-Louisiana border.

In response to these constraints, ExxonMobil developed and implemented an approved alternative monitoring plan, which has been endorsed by TCEQ, to minimize vulnerable personnel interaction during the pandemic while employing an environmentally protective technical alternative (Attachments 1 & 2). The approved alternative plan utilizes Optical Gas Imaging (OGI) to meet 2Q20 monitoring requirements with reduced monitoring crew size. The OGI monitoring plan closely follows the Alternate Work Practice (AWP) to Method 21, as written in 30 TAC 115 (§115.358), and NSPS Subpart A (§60.18(g)).

ExxonMobil Beaumont Refinery would like to request Force Majeure for Leak Detection and Repair programs (Paragraph 122-130 & 132-133) to allow the use of the alternate leak detection method, OGI monitoring, to complete second quarter LDAR monitoring consistent with the principles and procedures for such monitoring as detailed in Attachment 1.

ExxonMobil will provide follow-up communications as new issues are identified and to provide updates on identified potential issues.

If you have any questions or concerns about this notice, please contact Stephen Codoluto at (409) 240-3279 or beaumont.env.admin@exxonmobil.com.

April 28, 2020
Follow-Up to Notification of Potential Force Majeure Event and Request for Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Beaumont Facilities

Sincerely,

4-28-20

David M. Gorsich
Beaumont Complex SSHE Manager

vms

cc:
Director, Air Enforcement Division
Office of Regulatory Enforcement
c/o Matrix New World Engineering, Inc.
26 Columbia Turnpike
Florham Park, NJ 07932
CERTIFIED MAIL NO. 7019 0700 0001 4427 4763
RETURN RECEIPT REQUESTED

Mr. Andrew Wheeler
Environmental Protection Agency Administrator
EPA Administrator Mail Code 1101A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 0700 0001 4427 4756
RETURN RECEIPT REQUESTED

Mr. Lawrence Starfield
Environmental Protection Agency Acting Assistant Administrator
Air Enforcement Division Director Mail Code 2201A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 0700 0001 4427 4749
RETURN RECEIPT REQUESTED

Mr. Michael Shapiro
Environmental Protection Agency Acting Assistant Administrator
EPA Office of Water, Mail Code 1101A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 0700 0001 4427 4732
RETURN RECEIPT REQUESTED

Mr. Ken McQueen
Environmental Protection Agency Region 6 Regional Administrator
1201 Elm Street, Suite 500
Dallas, TX 75270

April 28, 2020
Follow-Up to Notification of Potential Force Majeure Event and Request for Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Beaumont Facilities

CERTIFIED MAIL NO. 7019 0700 0001 4427 4725
RETURN RECEIPT REQUESTED

Mr. Toby Baker
Executive Director
Texas Commission on Environmental Quality
P.O. Box 13087, MC-109
Austin, TX 78711-3087
CERTIFIED MAIL NO. 7019 0700 0001 4427 4718
RETURN RECEIPT REQUESTED

Texas Commission on Environmental Quality Region 10
3870 Eastex Fwy
Beaumont, TX 77703-1830
CERTIFIED MAIL NO. 7019 0700 0001 4427 4701
RETURN RECEIPT REQUESTED

Electronic copies:
foley.patrick@epa.gov
R6CAACDDeliverables@epa.gov
jmack@matrixneworld.com
Lawrence Starfield (Starfield.lawrence@Epa.gov)
David Gray (Gray.david@Epa.gov)
Cheryl Seager (Seager.cheryl@Epa.gov)

Attachment 1
Beaumont Request for Enforcement Discretion for LDAR

DocuSign Envelope ID: 2C5B0ED8-5F03-47F7-AD59-3BDBF892E52F

ExxonMobil
Fuels & Lubricants Company
PO Box 3311
Beaumont, Texas 77704-3311

ExxonMobil

April 24, 2020

Ramiro Garcia Jr.
Deputy Director, MC 172
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087
Electronic Submittal to: OCE@tceq.texas.gov and Ramiro.Garcia@tceq.texas.gov

Re: Request for Enforcement Discretion for LDAR Monitoring and Recordkeeping Obligations and Planned Substitute as a Result of COVID-19 for ExxonMobil Beaumont Facilities

On behalf of ExxonMobil Oil Corporation's Beaumont Facilities, enclosed is a request for Enforcement Discretion as a result of the global pandemic outbreak of Coronavirus Disease 2019 ("COVID-19"). As previously described in the "Notification of Potential Force Majeure Event and Request for Enforcement Discretion as a Result of COVID-19..." letters dated March 27, 2020 and April 1, 2020, the COVID-19 event has impacted the ability of the following ExxonMobil facilities to comply with various provisions of state and federal air regulations, collectively referred to as the ExxonMobil "Beaumont Facilities":

ExxonMobil Beaumont Refinery (BMRF), RN No. 102450756
ExxonMobil Beaumont Chemical Plant (BMCP), RN No. 100542844
ExxonMobil Beaumont Polyethylene Plant (BPEP), RN No. 100211903

The Beaumont Facilities has carefully considered ways in which to significantly reduce the number of onsite personnel while still meeting regulatory requirements; however, it is necessary at this time to provide notice of COVID-19 complications impacting the Beaumont Facilities LDAR monitoring obligations.

The actions taken by the Beaumont Facilities to date in response generally to COVID-19 have been reasonable and prudent while balancing regulatory obligations and the health of our employees and contractors. These actions have included proactively reinforcing social distancing (including reducing the number of non-essential employees working at the respective sites), limiting exposure of essential personnel to outside persons, and implementing the use of virtual meetings.

Personnel were additionally asked to self-monitor for symptoms, including taking temperature twice daily, and to self-quarantine if the employee or contractor had symptoms of COVID-19, has come in contact with a person with COVID-19, or has recently travelled to an area with sustained COVID-19 transmission. Additionally, due to the impacts of COVID-19, schools in the local area have temporarily closed until further notice which caused many employee's children to be at home during the day. In order to enable on-site presence of essential personnel to maintain safe

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operations of these facilities, ExxonMobil has offered a backup care advantage program to assist qualifying employees with finding child care. Unfortunately, future developments may impair the ability to fulfill all requirements.

Due to what all federal and state agencies acknowledge to be a rapidly evolving and unknown progression of the disease in the public, the Beaumont Facilities respectfully requests Enforcement Discretion for the following LDAR monitoring, notification and recordkeeping impacts arising from the disease beyond the control of ExxonMobil, despite the exercise of due diligence and all reasonable steps to avoid or minimize delays or impediments to performance. Currently, the Beaumont Facilities are operational; however, the sites are continuing to managing abnormal operations and several vulnerabilities as a result of COVID-19.

In late March, the Beaumont Facilities began experiencing increasing numbers of LDAR Monitoring Technicians taking off work due to COVID-19 concerns. The facilities were able to complete first quarter monitoring by working overtime with the reduced crew, while being cautious to emphasize social distancing and hygiene guidance. In light of the various Texas counties stay at home orders, increasing local LDAR monitoring contractor safety concerns, and in an effort to help slow the local spread of COVID-19, the ExxonMobil Beaumont Facilities elected to implement a 14-day LDAR monitoring pause from April 1 to April 14 and asked the monitoring crews to stay at home. Since implementing the 14-day pause, Southeast Texas has continued to experience an upward trend of COVID cases. In addition to concerns listed above, a portion of the LDAR monitoring crews supporting the Beaumont Facilities reside in Louisiana, and must travel across the quarantined Texas-Louisiana border. ExxonMobil's alternative plan minimizes vulnerable personnel interaction during the pandemic while employing an environmentally protective technical alternative.

Enforcement Discretion Request

ExxonMobil has brought a reduced staff size back onsite to begin second quarter LDAR monitoring using Optical Gas Imaging (OGI). As you know, Optical Gas Imaging has the added environmental benefit of monitoring equipment not typically required for routine monitoring and identifying additional leaks for minimizing emissions. The reduced LDAR monitoring crew size performing OGI monitoring has helped maintain social distancing during this pandemic, while offering the best chance to complete substantive monitoring of all components normally scheduled for the second quarter.

- Citation of rule / permit provision for which enforcement discretion is requested
  - 40 CFR 60.18(i)
  - 30 TAC 115.358(g)
  - Applicable permit provisions that reference or incorporate the above rules
    - NSR Permit Nos. 49138, 83702, 6860, and 8758
    - Title V Permit Nos. O2000, O2292, O1243, O2277, and 115295

Optical Gas Imaging is an approved Alternate Work Practice (AWP) to Method 21, as written in 30 TAC 115 (§115.358), and NSPS Subpart A (§60.18(g)). The reason industry does not follow this AWP is because of the burdensome recordkeeping requirement and that is not fully reflective of latest improvements in OGI technology. It is important to note EPA currently is in development of revisions to the alternative work practice for OGI with a target proposal date in late summer/early fall of this

year. ExxonMobil and API have been active participants in support and advocacy of these changes. ExxonMobil requests Enforcement Discretion to allow the use of OGI monitoring to complete second quarter LDAR monitoring consistent with the principles and procedures for such monitoring, including: training; camera calibration and maintenance; daily evaluation of camera imagery capability with respect to monitoring conditions (e.g., wind speed, distance, delta T); and recordkeeping, which are all being developed as part of this effort. The primary difference between the OGI methodologies under development versus what is written in the existing AWP is in the documentation of monitoring, and recordkeeping requirements (continuous video record). In lieu of recording every LDAR component monitored with a date and time stamp as required in §60.18(g), ExxonMobil proposes the alternative recordkeeping in the section below. ExxonMobil believes OGI monitoring combined with the proposed recordkeeping below will be environmentally protective while responsibly managing COVID-19 challenges at the site. Continued fence line monitoring will be able to help identify any issues with elevated emissions; this data coupled with subsequent quarterly LDAR monitoring results via Method 21 will demonstrate the effectiveness of the OGI camera monitoring. ExxonMobil also requests Enforcement Discretion for not being able to meet the 30-day notification requirement as required in 30 TAC 115.358 (g).

Proposed Recordkeeping Alternative

To ensure accurate documentation of these efforts, ExxonMobil will record and retain the first LDAR component monitored each day to document the beginning of the rounds, every leak identified, the leak repair follow-up monitoring, and the last LDAR component monitored each day to document completion of the rounds for 5 years, consistent with current record retention requirements. In addition, while performing OGI monitoring, the LDAR technician will enter a Pass or Fail result into the handheld device for one LDAR component at every area that is scanned. By entering this information in the field, the handheld will capture the GPS coordinates at every location scanned. The Facilities will continue to follow the 5 and 15 day repair requirements as stated in the rule. A repair technician will accompany the camera operator daily, practicing social distancing and with appropriate PPE, to make first attempts at repair in real time where possible. Following any needed repair attempts, the component will be recorded again to document the successful repair, or to show the need for a final repair within 15 days. To improve efficiency, the repair technician will utilize paper copies of the monitoring route to locate the next group of components for the camera operator to scan. This will minimize time lost for the camera operator to search for the next component(s) after scanning an area. At the end of each monitoring day, the passing results will be entered into the LDAR database for all remaining components monitored that day. With this process, the results of all components monitored will be tracked in the LDAR database, demonstrating that the Facilities have monitored every component.

Schedule for Mitigating the Delay or Impediments to Performance – Duration of Request

ExxonMobil currently anticipates the Beaumont Facilities will be able to resume normal staffing of its facility and return to normal work arrangements **beginning no later than June 30, 2020**. However, due to the uncertainty associated with the rapidly evolving developments of COVID-19, the actual length of time where delays or impediments are felt may be different than anticipated. While following recommendations for the Centers for Disease Control and the Occupational Safety and Health Administration, and monitoring the community and greater effects of COVID-19, ExxonMobil will make all efforts to protect the health of its employees to maintain safe operation, and to return

to normal operations as soon as practical. Updates to the exact timing of resuming normal operations related to LDAR Monitoring will be included in a follow-up to this letter.

Sincerely,

DocuSigned by:

8EEAD53B38B744F...

David Gorsich
Beaumont Complex SSHE Manager

Attachment 2
TCEQ Approval for Beaumont Request for Enforcement Discretion for LDAR

Stevens, Vanna

From: Reese, J Derek
Sent: Monday, April 27, 2020 10:37 AM
To: Stevens, Vanna
Subject: FW: Request for Enforcement Discretion- ExxonMobil Supplemental
Attachments: BMT_LDAR_Enf._Disc._Request_-_COVID_4.24.20_Final.pdf

Here is attachment and TCEQ approval email

From: Tomlinson, Byron K
Sent: Friday, April 24, 2020 7:59 PM
To: Gorsich, David M <david.m.gorsich@exxonmobil.com>; Codoluto, Stephen C <stephen.c.codoluto@exxonmobil.com>; Roccaforte, Charles M <charles.m.roccaforte@exxonmobil.com>; Job, Jennifer Leann <jennifer.l.job@exxonmobil.com>; Hampton, Sherman W <sherman.w.hampton@exxonmobil.com>; Reese, J Derek <j.derek.reese@exxonmobil.com>; Torrant, Andrew J <andrew.j.torrant@exxonmobil.com>; La Fortune, Farrah G <farrah.g.lafortune@exxonmobil.com>
Subject: FW: Request for Enforcement Discretion- ExxonMobil Supplemental

Good news... TCEQ approved the Enforcement Discretion request to use OGI to complete second quarter LDAR monitoring (see response below).

Regards,
Byron K. Tomlinson

From: Jonathan Walling [mailto:jonathan.walling@tceq.texas.gov]
Sent: Friday, April 24, 2020 6:43 PM
To: Tomlinson, Byron K <byron.k.tomlinson@exxonmobil.com>
Cc: OCE <OCE@tceq.texas.gov>
Subject: Request for Enforcement Discretion- ExxonMobil Supplemental

External Email - Think Before You Click

Good afternoon, Mr. Tomlinson:

The TCEQ has reviewed the supplemental information provided by ExxonMobil Corporation for its Beaumont facilities, consisting of ExxonMobil Beaumont Refinery, ExxonMobil Beaumont Chemical Plant and ExxonMobil Beaumont Polyethylene Plant. The information submitted requests enforcement discretion for LDAR monitoring required by 40 CFR §60.18(i), 30 TAC §115.358(g), New Source Review Permit numbers 49138, 83702, 6860 and 8758 and Title V Permit numbers 02000, 02292, 01243, 02277 and 115295. The proposal is for ExxonMobil to use an alternate work practice to Method 21, by employing the use of an optical gas imaging camera(s).

The specific activities relating to the alternate work practice noted in your April 24, 2020 request (attached) are approved. This enforcement discretion is valid until June 30, 2020. The monitoring activities shall be completed no later than this date, as conditions allow. Should an extension beyond this be needed, please submit a request to extend this deadline.

Regulated entities must maintain records adequate to document activities related to the noncompliance under enforcement discretion, including details of the regulated entity's best efforts to comply.

This enforcement discretion is limited to the Texas Commission on Environmental Quality. It does not limit EPA's ability to enforce federal regulations.

This approval supersedes the original TCEQ denial of this alternate work practice, dated April 20, 2020.

Regards,

Jonathan Walling, Area Director
Coastal & East Texas Area
Texas Commission on Environmental Quality

From: Tomlinson, Byron K <byron.k.tomlinson@exxonmobil.com>
Sent: Friday, April 24, 2020 1:32 PM
To: OCE <OCE@tceq.texas.gov>; Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Subject: Request for Enforcement Discretion

Mr. Ramiro Garcia,
Please see the attached letter requesting Enforcement Discretion for the use of Optical Gas Imaging (OGI) to fulfill second quarter 2020 fugitive emissions monitoring requirements, due to impacts from the Coronavirus.

If you have any questions regarding this electronic submittal, please contact Stephen Codoluto at (409) 240-3279 or Beaumont.env.admin@exxonmobil.com.

Regards,
Byron K. Tomlinson
Environmental Field Services Section Supervisor
ExxonMobil Beaumont Complex
1795 Burt Street
Beaumont, TX 77701
Office: 409-240-3536, BOB: 3425
Cell: 409-651-8542
Fax: 409-757-6259
Email: Byron.k.tomlinson@exxonmobil.com

CERTIFIED MAIL

7019 0700 0001 4427 4794

U.S. POSTAGE PITNEY BOWES

ZIP 77701 $ 007.80
02 4W
0000360240 APR 29 2020

Chief
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, DC 20044-7611

U.S. Department of Justice

Environment and Natural Resources Division

DJ #90-5-2-1-07030

Environmental Enforcement Section
P.O. Box 7611
Washington, DC 20044-7611

Telephone (202) 514-1308
Facsimile (202) 616-6584
randall.stone@usdoj.gov

May 13, 2020

BY ELECTRONIC MAIL

David M. Gorsich
Stephen Codoluto
ExxonMobil Fuels & Lubricants Company
P.O. Box 3311
Beaumont, TX 77704-3311

E-Mail: david.m.gorsich@exxonmobil.com
beaumont.env.admin@exxonmobil.com

Re: Follow-Up Force Majeure Notification Concerning the Beaumont Refinery Under 2005 Consent Decree

Dear Sirs:

We have received your letter of April 28, 2020, submitting a follow-up force majeure notice due to the impact of the novel coronavirus COVID-19. This letter will serve as the response on behalf of the United States pursuant to the Consent Decree entered in *United States v. Exxon Mobil Corp.*, No. 05-cv-5809 (N.D. Ill.). ExxonMobil submitted its original force majeure notification for potential impacts of the COVID-19 pandemic at the Beaumont Refinery on March 27, 2020, and the United States provided a letter response to that initial notification on April 28, 2020.

Your most recent letter reports that the "ExxonMobil Beaumont Refinery has successfully been able to meet its compliance obligations under the Consent Decree" so far, and that "no new potential issues have arisen since our initial notification," with one exception explained as follows:

> In late March, the Beaumont Facilities began experiencing increasing numbers of LDAR Monitoring Technicians taking off work due to COVID-19 concerns . . . . In response to these constraints, ExxonMobil developed and implemented an approved alternative monitoring plan, which has been endorsed by TCEQ, to minimize vulnerable personnel interaction during the pandemic while employing an environmentally protective technical alternative (Attachments 1 & 2). The approved alternative plan utilizes Optical Gas Imaging (OGI) to meet 2Q20

monitoring requirements with reduced monitoring crew size. The OGI monitoring plan closely follows the Alternate Work Practice (AWP) to Method 21, as written in 30 TAC 115 (§115.358), and NSPS Subpart A (§60.18(g)).

ExxonMobil Beaumont Refinery would like to request Force Majeure for Leak Detection and Repair programs (Paragraph 122-130 & 132-133) to allow the use of the alternate leak detection method, OGI monitoring, to complete second quarter LDAR monitoring consistent with the principles and procedures for such monitoring as detailed in Attachment 1.

ExxonMobil has made this request under Consent Decree Section XIV (Force Majeure).

Although not noted in your letter, the Consent Decree expressly allows use of alternative LDAR monitoring approaches, subject to EPA approval. Consent Decree Paragraph 132 provides as follows:

> **Alternate Leak Detection Method**. With EPA's prior written approval, ExxonMobil may begin using an alternate leak detection method – such as a method employing "Smart LDAR" technology – based on a showing that the alternate leak detection method is equivalent to traditional monitoring methods and is allowable under the applicable LDAR regulations.

As highlighted in your correspondence, 40 C.F.R. § 60.18(g)-(i) allows use of an OGI instrument as an alternate work practice for monitoring equipment for leaks. Under the present circumstances, EPA is willing to approve ExxonMobil's proposed use of OGI monitoring to complete second quarter LDAR monitoring at the Beaumont Refinery consistent with the principles and procedures for such monitoring as detailed in Attachment 1 to your letter. In accordance with Consent Decree Paragraph 132 and Section XIV, this letter constitutes the United States' written confirmation of EPA's approval for ExxonMobil to utilize that alternate leak detection method at the Beaumont Refinery during the second quarter of 2020.

Please feel free to have your counsel contact me if you have any questions about this response to your recent letter.

Sincerely,

RANDALL STONE

Digitally signed by RANDALL STONE
Date: 2020.05.13 16:30:13 -04'00'

Randall M. Stone
Senior Attorney

Copies (by email) to

Justin Lannen, EPA
Cheryl Barnett, EPA
Darrin Larson, EPA
Providence Spina, EPA
Gregory Fried, EPA

Message

From: Jody Lee Mack [jmack@matrixneworld.com]
Sent: 4/17/2020 8:02:32 PM
To: Parrish, Robert [Parrish.Robert@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; Lundelius, Diana [Lundelius.Diana@epa.gov]
CC: Dan Roper [dan.roper@erg.com]; Burke, Shaun [Burke.Shaun@epa.gov]; Dykes, Teresa [Dykes.Teresa@epa.gov]
Subject: FW: ExxonMobil Baytown Refinery - Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19
Attachments: 20200408 EM BTRF EPA CD Force Majeure Notification - COVID19 (Case No. 0....pdf

Attached please find the following for your review:

Deliverable Title: Notification of Potential Force Majeure Event and Request for Enforcement Discretion-COVID-19
Deliverable Date: April 8, 2020
Refinery: ExxonMobil - Baytown
Marquee Issue: Force Majeure

Nature of Review: EPA response required

EPA Review and Turnaround Time

Total Review Time (per CD): 30 days
Due Date for National Expert/Regional Contact to provide comments to Headquarters: 5/1/20
Due Date for Headquarters to submit written response to refinery: Headquarters has until ***5/8/20 (90 days)*** to submit a written response to Baytown

Completeness Review Conducted by Matrix

Matrix conducted a review of the attached document for completeness purposes only. This review included the following:

- Timely submittal of document (per requirements of CD)
- Document included basic elements set forth in CD
- Completeness of document (i.e. no pages missing)

Attached document was submitted within the 30-day requirement set forth in the CD.
Attached document appears to contain all requirements set forth in the CD.

From: Bowman, Meagan D <meagan.d.bowman@exxonmobil.com>
Sent: Wednesday, April 8, 2020 6:33 PM
To: foley.patrick@epa.gov; R6CAACDDeliverables@epa.gov; Jody Lee Mack <jmack@matrixneworld.com>; neichlin@matrixengineering.com; Lawrence.Starfield@epa.gov; Samuel.Coleman@epa.gov; tom.mariani@usdoj.gov; brooks.phillip@epa.gov
Subject: ExxonMobil Baytown Refinery - Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19

[EXTERNAL]
Pursuant to Paragraph 218 of the Consent Decree between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, attached please find a Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Baytown Refinery.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
5000 Bayway Drive, CAB W-121a
Baytown, Texas 77520

Lync: 346.259.2345
Mobile: 281.917.5014
Fax: 346.259.5788

Exxon Mobil Corporation
5000 Bayway Drive
P.O. Box 4004
Baytown, Texas 77522-4004

ExxonMobil

April 8, 2020

Chief
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, DC 20044-7611
Reference Case No. 90-5-2-1-07030
CERTIFIED MAIL NO. 7019 1120 0001 9502 4116
RETURN RECEIPT REQUESTED

Director
Air Enforcement Division
Office of Regulatory Enforcement
U.S. Environmental Protection Agency
Ariel Rios Building, Mail Code 2242-A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 1120 0001 9502 4123
RETURN RECEIPT REQUESTED

Chief
Chemical Accident Enforcement Section (ECDAD)
Air Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency - Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270-2102
CERTIFIED MAIL NO. 7019 1120 0001 9502 4130
RETURN RECEIPT REQUESTED

Re: Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Baytown Refinery

Dear Sirs and Madams:

Pursuant to Paragraph 218 of the Consent Decree ("CD") between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, entered on December 13, 2005, this letter provides notice that a force majeure event as described in Paragraph 218 of the CD (herein, "Force Majeure") ***may potentially occur*** as a result of the global

pandemic outbreak of Coronavirus Disease 2019 ("COVID-19"). ***This notification is being provided out of an abundance of caution to preserve all rights under the CD as the COVID-19 pandemic further develops.*** ExxonMobil continues to take diligent and prudent actions to protect the health and safety of its workers, the public and the environment, and to meet market needs as the COVID-19 pandemic develops. However, this potential Force Majeure event may impact the ability of the ExxonMobil Baytown Refinery ("Baytown Refinery") to comply with various provisions of the CD, as well as federal air, water and/or waste regulations.

The CD requires ExxonMobil to include certain CD requirements in the Title V operating permit. Thus, some of the potential compliance issues identified in this Force Majeure notification may also be potential noncompliance with the Title V operating permit. Similarly, many of the CD requirements relate to federal regulations. This letter advises of potential federal air, water and waste regulatory compliance issues under the CD or other permit(s), and/or federal rules and regulations, generally for the Baytown Refinery. To the extent that exemptions do not apply to any such noncompliance or such issues are deemed to be outside the scope of this notification of potential Force Majeure under the CD or other permit(s), and/or federal rules and regulations, ExxonMobil respectfully requests that EPA exercise enforcement discretion to not seek penalties or other enforcement action for potential noncompliance as a result of a reduced workforce from COVID-19 from the period of **April 8, 2020 to June 30, 2020. This initial period may become extended depending on the nature and severity of the COVID-19 impacts over the next few months, and follow-up notifications will be submitted to provide ongoing updates of any actual compliance impacts.** Please note that should potential compliance issues with state regulatory requirements and/or federal regulatory requirements delegated to the state arise due to COVID-19 impacts, the Baytown Refinery will request enforcement discretion, as appropriate, from the Texas Commission on Environmental Quality (TCEQ).

The CD specifies that a Force Majeure request must comply with the requirements of Article XIV of the CD and must describe the anticipated length of time the delay or impediment may persist, the cause or causes of the delay or impediment, and the measures taken or to be taken by ExxonMobil to prevent or minimize the delay or impediment and the schedule by which those measures shall be implemented. These elements are described below, organized by the respective potentially impacted CD paragraph, along with a discussion of each element. Generally, the cause of the potential delay or impediment to performance is the reduction of staffing and available personnel due to COVID-19. Currently the Baytown Refinery is operational, but COVID-19 has led to changes to normal practices, including implementing measures to reduce worker interactions and additional vulnerabilities as a result of COVID-19.

COVID-19 and Its Impact

Explanation and Description of the Potential Delay or Impediment to Performance

COVID-19 affects the lungs and airways, with illnesses ranging from mild symptoms to severe illness and death.[1] The virus is highly communicable, remaining viable for hours to days on surfaces made

[1] "Symptoms", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html (accessed March 16, 2020).

from a variety of materials.[2] The Centers for Disease Control and Prevention ("CDC") itself has stated that "[m]uch is unknown about how the virus that causes COVID-19 spreads."[3] "Close contact" (within about 6 feet) is the most frequent spread from person-to-person.[4] There is no known treatment or vaccine for COVID-19.[5] The CDC states that "[t]he complete clinical picture with regard to COVID-19 is not fully known."[6] The agency stated that "[t]his is the first pandemic known to be caused by the emergence of a new coronavirus," and admitted that "this is a rapidly evolving situation."[7]

As the COVID-19 pandemic has developed and become more dire across the country, government entities and Non-Governmental Organizations ("NGOs") have reacted with progressively more stringent recommendations and restrictions. On January 30, 2020, the International Health Regulations Emergency Committee of the World Health Organization ("WHO") labeled the outbreak a "public health emergency of international concern."[8] On January 31, the U.S. Health and Human Services Department declared a public health emergency for international aid.[9] On March 11, the WHO publicly declared COVID-19 as a pandemic. That same day, the Houston Mayor and County Judge of Harris County signed a proclamation declaring a Local State of Disaster Due to a Public Health Emergency in Houston and Harris County, respectively.[10] On March 13, the President of the United States declared the outbreak a national emergency.[11] That same day, the Governor of the State of Texas issued a proclamation that COVID-19 poses an imminent threat of disaster, declaring

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[2] "Environmental Cleaning and Disinfection Recommendations", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html (accessed March 16, 2020).

[3] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).

[4] "Environmental Cleaning and Disinfection Recommendations", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html (accessed March 16, 2020).

[5] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[6] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[7] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[8] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[9] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[10] "Mayor Sylvester Turner and Harris County Judge Lina Hidalgo Declare Public Health Emergency Due to COVID-19", Mayor's Office Press Release, http://houstontx.gov/mayor/press/2020/public-health-emergency-declared-covid-19.html (accessed March 23, 2020)

[11] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

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a state of disaster for all counties in Texas.[12] On March 24, the County Judge of Harris County issued a Stay Home, Work Safe Order effective as of 11:59 p.m. on March 24.[13] Finally, on March 31, the Governor of the State of Texas issued Executive Order GA 14, directing a state-wide order effective at 12:01 a.m. on April 2 through April 30, 2020 to "minimize social gatherings and minimize in-person contact with" non-household members except where necessary to provide or obtain essential services.[14]

As the Occupational Safety and Health Administration ("OSHA") acknowledges, COVID-19 renders wide impacts on absenteeism based on illness, caregiving for sick or the at-risk, and caregiving for school closures.[15] Interrupted supply lines may also cause severe impacts.[16] OSHA specifically recommended flexible telecommuting where possible.[17] OSHA also encouraged minimizing contact among workers, and establishing a reduction in the total number of employees in a facility at a given time, "allowing them to maintain distance from one another..."[18] Eventually, the CDC recommended that in-person community events of fifty (50) people or more be postponed or cancelled, with a subsequent recommendation by the White House that in-person events of ten (10) people or more be cancelled or postponed between March 16-30[19], currently extended through April 30.

The CDC states that "[a]ll employers need to consider how best to decrease the spread of acute respiratory illness and lower the impact of COVID-19 in their workplace..."[20] The Baytown Refinery has taken and continues to take cautious and reasonable steps to prepare for any COVID-19 impact. The Baytown Refinery followed the cleaning and disinfection recommendations of the CDC for weeks prior to any confirmed case in Baytown or Harris County.[21] The Baytown Refinery also followed established recommendations to avoid the spread of the illness.[22]

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[12] "Governor Abbott Declares State of Disaster in Texas Due to COVID-19", Office of the Texas Governor, https://gov.texas.gov/news/post/governor-abbott-declares-state-of-disaster-in-texas-due-to-covid-19 (accessed March 16, 2020).

[13] "Stay Home, Work Safe", Order of County Judge Lina Hidalgo, https://www.houston.org/news/harris-county-issues-mandatory-stay-home-work-safe-order (accessed March 26, 2020).

[14] "Executive Order GA 14", https://gov.texas.gov/uploads/files/press/EO-GA 14_Statewide_Essential_Service_and_Activity_COVID-19_IMAGE_03-31-2020.pdf (accessed April 2, 2020).

[15] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

[16] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

[17] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

[18] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

[19] "Get Your Mass Gatherings or Large Community Events Ready", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/large-events/mass-gatherings-ready-for-covid-19.html (accessed March 16, 2020).

[20] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).

[21] "Environmental Cleaning and Disinfection Recommendations", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html (accessed March 16, 2020).

[22] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).

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The Baytown Refinery has carefully established essential personnel plans. On March 13, the Baytown Refinery transitioned to the "Hot Standby Phase" of its plan, taking steps to facilitate further social distancing and leveraging alternative work locations by shifting operations to "essential personnel" only.

However, as the CDC acknowledges, those plans must be "flexible" given the uncertainties related to the disease and possible community impacts.[23] When planning, the CDC recommended considering factors including:

- The overall number of attendees (*Baytown Refinery employs a workforce of approximately 1,500 employees and also utilizes independent contractors)*;
- The number of people attending who are at greater risk of more serious illness after contracting COVID-19 *(Baytown Refinery employs vulnerable employees)*;
- The density of attendees within a confined area *(Baytown Refinery normal operations require work within confined areas)*;
- The potential economic impact to participants, attendees, staff, and the larger community;
- The level of transmission in your local community, and the level of transmission in the areas from which your attendees will travel (*ExxonMobil is a global company)*; and
- If there are ways in which to significantly reduce the number of attendees.[24]

The Baytown Refinery has carefully considered ways in which to significantly reduce the number of on-site personnel while still meeting regulatory obligations. The actions taken by the Baytown Refinery to date have been reasonable and prudent while balancing regulatory obligations and maintaining the health and safety of its workers and the public.

Measures taken at the Baytown Refinery include reducing the number of non-essential employees working on-site to limit exposure of essential personnel to outside persons, proactively reinforcing social distancing and implementing the use of virtual meetings. Personnel were also asked to self-monitor for symptoms; and to self-quarantine if the employee or contractor experienced symptoms of COVID-19, has come in contact with a person with COVID-19, or recently travelled to an area with sustained COVID-19 transmission. In addition, ExxonMobil offered assistance to qualifying employees with childcare needs during school closures to enable on-site presence of essential personnel to maintain safe operations at the Baytown Refinery.

Unfortunately, future developments may impair the ability to fulfill all requirements. Due to what federal and state agencies acknowledge to be a rapidly evolving and unknown progression of the disease in the public, the Baytown Refinery respectfully provides notice that the enclosed may be potential impacts arising from the disease beyond the control of ExxonMobil, despite the exercise of due diligence and all reasonable steps to avoid or minimize delays or impediments to performance.

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[23] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).
[24] Get Your Mass Gatherings or Large Community Events Ready," Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/large-events/mass-gatherings-ready-for-covid-19.html (accessed March 16, 2020).

Schedule for Mitigating Potential Delays or Impediments to Performance
ExxonMobil anticipates that the Baytown Refinery will be able to resume normal staffing at the site and return to normal work arrangements/operations **beginning no later than June 30, 2020**. However, due to the uncertainty associated with the rapidly evolving developments of COVID-19, the actual length of time where potential delays or impediments are experienced may be different than originally anticipated. While following recommendations from the CDC and OSHA, and monitoring the community and greater effects of COVID-19, ExxonMobil will make all diligent efforts to protect the health of its employees to maintain safe operation, and to return to normal operations as soon as practical. Updates to the exact timing of resuming normal work arrangements/operations will be included in a follow-up to this letter.

Potential Impacted Issues

As a result of the above-described situation, ExxonMobil believes the expected potential impact of COVID-19 on the Baytown Refinery qualifies as a Force Majeure event as described in Paragraph 218 of the CD. In addition, to the extent that the effects of this pandemic impact the ability of the Baytown Refinery to comply with federal air, water and/or waste regulations, ExxonMobil requests enforcement discretion during this event for the following enumerated areas for the period from **April 8, 2020 through June 30, 2020**. This time period represents the commencement of potential impacts from COVID-19 to our current best estimate of a return to normal work arrangements/operations.

The following list identifies an initial set of potential compliance issues at the Baytown Refinery that may occur in the initial phases of COVID-19 response. ***It is important to note that these are primarily administrative delays or adjustments to activities which are expected to have minimal to no emissions or environmental impact.*** ExxonMobil's requests and contingency responses are consistent with the March 26, 2020 guidance memo provided by the EPA ("COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program"), and are reasonable and environmentally protective in light of the pandemic impacts acknowledged by EPA's guidance memo.[25] Site emission control and treatment devices and systems remain operational at this time consistent with CD and other federal regulatory obligations:

1. Leak Detection and Repair (CD Paragraphs 123 – 130; and other federal regulations with standards for equipment leaks and requiring fugitive emissions monitoring)

   The Baytown Refinery is currently required and able to complete fugitive emissions monitoring, including periodic rounds for audio, visual and olfactory ("AVO") testing, and repair on some components for which monitoring is required. The Baytown Refinery will continue to be operated in such a manner that all required monitoring and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed monitoring and/or repairs, including repair of components on Delay of Repair. These Delay of

[25] "COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program", Environmental Protection Agency, https://www.epa.gov/coronavirus (accessed March 26, 2020).

Repair components will be repaired or replaced during the next planned shutdown of the respective units.

If necessary as a result of personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness), alternative monitoring approaches will be evaluated with applicable federal agencies. Alternatives may include Optical Gas Imaging ("OGI") camera monitoring, smaller monitoring crews, etc.; however, these approaches are yet to be determined.

2. NESHAP for Benzene Waste Operations (CD Paragraphs 98, 102, 108, 110, 111 and 112; and 40 CFR 61 Subpart FF)

   The Baytown Refinery is currently required and able to complete inspection, monitoring, and repair of applicable equipment per the requirements in 40 CFR Part 61, Subpart FF, including monitoring and replacement of carbon canisters. The Baytown Refinery will continue to be operated in such a manner that all required inspections, monitoring and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed inspections, monitoring and/or repairs.

   The Baytown Refinery will pay particular attention to carbon absorption and treatment devices to ensure proper operations to meet emission and concentration limitations to the maximum extent practical. In most instances, missed or delayed inspections and/or monitoring would not indicate loss of control/treatment capability, but rather foregoing a routine verification step. Operational parameters and conditions provide adequate ability to achieve compliance with applicable standards in the absence of periodic inspections and/or monitoring.

3. Continuous Emissions Monitoring Systems ("CEMS") or Continuous Parameter Monitoring Systems ("CPMS") (CD Paragraphs 21, 32, 42, 54, 64.b, and 73); 40 CFR Part 60 Appendices; and other federal regulations requiring continuous monitoring)

   The Baytown Refinery is currently required and able to operate and maintain numerous CEMS and CPMS to demonstrate compliance with various federal requirements. Maintenance of the CEMS includes, but is not limited to, periodic validations, quarterly cylinder gas audits ("CGAs"), annual relative accuracy test audits ("RATAs"), periodic stack tests of associated equipment and/or maintaining CEMS uptime greater than 95% of total operating time. The Baytown Refinery will continue to be operated in such a manner so as to achieve proper operation and maintenance of each instrumentation system, including the completion of timely repairs to maintain minimal downtime on each system, to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed maintenance and/or repairs on these instrumentation systems. These disruptions may increase downtime on regulatory-required instrumentation systems, which may potentially lead to exceeding 5% of operating time, despite taking all reasonable steps to minimize downtime.

Additionally, if third party vendors are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to perform specific maintenance requirements, then the Baytown Refinery will evaluate if operating parameters associated with the applicable equipment and/or instrumentation system indicate a degradation in performance. This would entail all reasonable steps to allow the site to continue to operate with a good faith belief that emission standards are being met. If the evaluation indicates emission standards continue to be met, then the site will continue to operate the applicable equipment.

4. Compliance with Title V Permit Conditions and Other Federal Regulatory Requirements

- NSPS for Petroleum Refineries – Flare Monitoring (40 CFR 60 Subpart Ja)
  The Baytown Refinery is currently required and able to collect and analyze weekly manual samples that are collected to measure the total sulfur-to-H2S ratio of the gas discharged to the flare and evaluate adherence with the previously established 95-percent confidence interval. The Baytown Refinery will continue to be operated in such a manner that all required samples are collected and analyzed in a timely manner to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed sampling and/or analysis.

  Additionally, if third party shipping vendors and/or laboratories are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to transport collected samples or provide timely analysis of collected samples, respectively, delays or potentially missed holding times may be experienced that could impact weekly sample analysis.

  The Baytown Refinery will pay particular attention to H2S analyzers, total sulfur analyzers and other applicable process parameters to verify that the previously established total sulfur-to-H2S ratio is a valid parameter to estimate sulfur content and emissions for flaring events. Absent manual samples, sample data, analyzer data and/or process parameters would be used to make an appropriate engineering evaluation.

- Storage Vessels (40 CFR 60 Subparts K, Ka, and Kb; 40 CFR Parts 61 and 63)
  The Baytown Refinery is currently required and able to complete periodic inspections of storage vessels, with the potential for required repairs. The Baytown Refinery will continue to be operated in such a manner that all required inspections and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed inspections and/or repairs.

- Wastewater Systems (40 CFR 60 Subpart QQQ); and other federal regulations requiring periodic monitoring of wastewater systems
  The Baytown Refinery is currently required and able to complete periodic inspections of applicable equipment per the requirements in 40 CFR Part 60, Subpart QQQ. In addition, the Baytown Refinery is currently required and able to complete inspection, monitoring, and repair of applicable wastewater equipment per the requirements in other federal regulations (e.g., 40 CFR 63 Subpart G). The Baytown Refinery will continue to be operated in such a

manner that all required inspections and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed inspections and/or repairs.

- NESHAP from Petroleum Refineries – Fenceline Monitoring (40 CFR 63 Subpart CC)
  The Baytown Complex (including the Baytown Refinery) is currently required and able to maintain and to collect samples from 50 passive benzene monitors located around the fenceline of the Baytown Complex. The Baytown Refinery will continue to be operated in such a manner that sample stations are maintained, samples are collected and analyzed in a timely manner and quarterly reports are prepared and posted timely to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed sample collection, analysis and/or associated reporting.

  Additionally, if third party shipping vendors and/or laboratories are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to transport collected samples or provide timely analysis of collected samples, respectively, delays or potentially missed holding times may be experienced that could impact bi-weekly sample analysis.

- NESHAP from Petroleum Refineries – Heat Exchange Systems (40 CFR 63 Subpart CC); and other federal regulations requiring Heat Exchange System monitoring
  The Baytown Refinery is currently required and able to complete periodic monitoring of heat exchange systems that have one or more heat exchangers in organic hazardous air pollutant ("HAP") service, with the potential for required repairs. The Baytown Refinery will continue to be operated in such a manner that all required monitoring and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed monitoring and/or repairs.

- NESHAP for Boilers and Process Heaters (40 CFR 63 Subpart DDDDD)
  The Baytown Refinery is currently required and able to complete periodic boiler and process heater tune-ups. The Baytown Refinery will continue to be operated in such a manner that all required tune-ups are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed tune-ups.

- Federal Regulatory Reporting
  The Baytown Refinery is currently required and able to submit numerous periodic reports as required by applicable federal regulations. The Baytown Refinery will continue to be operated in such a manner that all required reports are accurately completed and submitted timely to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in delayed report submittals as significant effort and coordination across the site is required to complete the reports accurately and in a timely manner.

- Federal Monitoring, Testing and Recordkeeping Requirements
  The Baytown Refinery is currently required and able to complete periodic inspections, sampling, monitoring, testing, recordkeeping, etc. per the requirements in 40 CFR Parts 60, 61, 63 and 68. The Baytown Refinery will continue to be operated in such a manner that all required inspections, sampling, monitoring, testing, recordkeeping, etc. are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed inspections, sampling, monitoring, testing, recordkeeping, etc.

- Water Regulations (Water Operating Permits)
  The Baytown Refinery is currently required by the Texas Pollutant Discharge Elimination System (TPDES) permit and is able to conduct regular monitoring of treated effluent waste water and storm water discharge. The Baytown Refinery will continue to be operated in such a manner that all required sampling of waste water is completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed sampling and/or analysis.

  Additionally, if third party laboratories are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to provide timely analysis of collected samples, delays or potentially missed holding times may be experienced that could impact monthly Discharge Monitoring Report ("DMR") data.

- Hazardous Waste Management (40 CFR 260 – 280)
  The Baytown Refinery is currently required and able to manage hazardous waste per the applicable Resource Conservation and Recovery Act ("RCRA") federal requirements that regulate how hazardous waste is managed on-site prior to being accepted at a transportation, disposal, and storage facility ("TSDF"). Hazardous waste is subject to specific treatment at the Baytown Refinery, including temporary storage in on-site containers, sampling, analysis of sample results and subsequent waste classification, scheduling disposal with a third party who meets all requirements, and transportation by qualified personnel. The Baytown Refinery will continue to be operated in such a manner to achieve adequate handling of hazardous waste, including taking all reasonable steps to expedite shipments of wastes to meet current 90-day on-site retention requirements. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may impact the availability of qualified personnel to complete each of these tasks in order to ship hazardous waste to a TSDF within 90 days.

  Additionally, if third party shipping vendors are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to provide the necessary drivers for transportation or if approved disposal facilities are closed, then the Baytown Refinery may be required to retain wastes on-site until the next available opportunity to ship the wastes.

- Chemical Accident Prevention Provisions (40 CFR Part 68)
  The Baytown Refinery is currently required and able to comply with 40 CFR Part 68, commonly referred to as the Risk Management Program. The Baytown Refinery will continue

to be operated in such a manner that all applicable requirements are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in potential documentation issues and/or delays, as summarized in the table below:

Citation	Activity
40 CFR 68.73	- Documentation of training compliance may be impacted by the pandemic (either due to precautionary conditions or actual illness) due to inability to access database / intranet remotely - Inspection and testing frequency may be impacted by the pandemic (either due to precautionary conditions or actual illness), resulting in the need for potential extensions - Timeliness of deficiency mitigation may be impacted by the pandemic (either due to precautionary conditions or actual illness) In the event that inspections and/or mitigation steps require extension, appropriate risk assessment protocols will be followed to document the deferral decision.
40 CFR 68.67 (f)	- Unit Process Hazard Analyses ("PHAs") may be impacted by the pandemic (either due to precautionary conditions or actual illness), resulting in potential delays beyond the required 5 year update
40 CFR 68.71(b)	- 3-year refresher training may be impacted by the pandemic (either due to precautionary conditions or actual illness) due to inability to access database / intranet remotely. In the event that 3-year refresher training goes overdue, refresher training would be completed as expeditiously as possible following the return to normal work arrangements/operations.

Should any reporting be required associated with the above items in the event compliance is prevented by Force Majeure, it will be completed as required in the CD and/or in applicable federal regulations, including Title V.

As of the date of this letter, the Baytown Refinery has not noted any regulatory compliance issues with the standards enumerated in the CD or other applicable federal regulations and permits at the Baytown Refinery as a result of the impacts of COVID-19. It is possible that with the spreading and widening impacts of the COVID-19 pandemic that potential noncompliance may be identified, despite ExxonMobil taking all reasonable steps to maintain safe, reliable, and compliant operations. All reasonable efforts will be made by ExxonMobil to ensure compliance with the CD and other applicable federal regulations and permits, and ExxonMobil will take all reasonable steps to complete the requirements in an expeditious fashion should undesired delays or impediments occur due to the pandemic. Although ExxonMobil does not currently anticipate compliance impacts, ExxonMobil reserves the right to identify additional impacts to which Force Majeure may apply, and will provide updates to the EPA in a follow-up letter.

Within 30 days of the mailing of this letter, a follow-up letter will be submitted to provide an update on any impacts from the pandemic experienced by the Baytown Refinery. Additional updates will be

provided throughout the duration of the pandemic period, as needed. Should you have any questions or concerns regarding this submittal, please contact Meagan Bowman at (346) 259-2345 or meagan.d.bowman@exxonmobil.com.

Sincerely,

Jeffrey K. Kovacs, P.E.
Baytown Complex SSHE Manager

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CERTIFIED MAIL NO. 7019 1120 0001 9502 3959
RETURN RECEIPT REQUESTED

Ms. Nicole Bealle
Regional Director
Texas Commission on Environmental Quality Region 12
5425 Polk Street, Suite H
Houston, TX 77023-1452
CERTIFIED MAIL NO. 7019 1120 0001 9502 3966
RETURN RECEIPT REQUESTED

Electronic copies:
foley.patrick@epa.gov
R6CAACDDeliverables@epa.gov
jmack@matrixneworld.com
neichlin@matrixengineering.com
Lawrence.Starfield@epa.gov
Samuel.Coleman@epa.gov
tom.mariani@usdoj.gov
brooks.phillip@epa.gov

Message

From: Jody Lee Mack [jmack@matrixneworld.com]
Sent: 6/9/2020 7:35:17 PM
To: Parrish, Robert [Parrish.Robert@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; Lundelius, Diana [Lundelius.Diana@epa.gov]
CC: Dan Roper [dan.roper@erg.com]; Burke, Shaun [Burke.Shaun@epa.gov]; Dykes, Teresa [Dykes.Teresa@epa.gov]
Subject: FW: ExxonMobil Baytown Refinery - Update 2 to Potential Force Majeure Event as a Result of COVID-19
Attachments: 20200605 EM BTRF EPA CD Force Majeure Update 2 - COVID19 (Case No. 05-C-....pdf

Attached please find the following for your review:

Deliverable Title: Update 2 to Potential Force Majeure Event as a Result of COVID-19
Deliverable Date: June 5, 2020
Refinery: ExxonMobil - Baytown
Marquee Issue: Force Majeure

Nature of Review: EPA review only

EPA Review and Turnaround Time

Total Review Time (per CD): NA
Due Date for National Expert/Regional Contact to provide comments to Headquarters: NA
Due Date for Headquarters to submit written response to refinery: NA

Completeness Review Conducted by Matrix

Matrix conducted a review of the attached document for completeness purposes only. This review included the following:

- Timely submittal of document (per requirements of CD)
- Document included basic elements set forth in CD
- Completeness of document (i.e. no pages missing)

Attached document was submitted within the 30-day requirement set forth in the CD.
Attached document appears to contain all requirements set forth in the CD.

From: Bowman, Meagan D <meagan.d.bowman@exxonmobil.com>
Sent: Friday, June 5, 2020 4:58 PM
To: foley.patrick@epa.gov; R6CAACDDeliverables@epa.gov; Jody Lee Mack <jmack@matrixneworld.com>; starfield.lawrence@epa.gov; gray.david@epa.gov; seager.cheryl@epa.gov; tom.mariani@usdoj.gov; brooks.phillip@epa.gov
Subject: ExxonMobil Baytown Refinery - Update 2 to Potential Force Majeure Event as a Result of COVID-19

[EXTERNAL]
Pursuant to Paragraph 218 of the Consent Decree between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, attached please find Update 2 to the Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Refinery.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
5000 Bayway Drive, CAB W-121a
Baytown, Texas 77520
Lync: 346.259.2345
Mobile: 281.917.5014
Fax: 346.259.5788

From: Bowman, Meagan D
Sent: Friday, May 8, 2020 5:36 PM
To: 'foley.patrick@epa.gov' <foley.patrick@epa.gov>; 'R6CAACDDeliverables@epa.gov' <R6CAACDDeliverables@epa.gov>; 'jmack@matrixneworld.com' <jmack@matrixneworld.com>; 'starfield.lawrence@epa.gov' <starfield.lawrence@epa.gov>; 'gray.david@epa.gov' <gray.david@epa.gov>; 'seager.cheryl@epa.gov' <seager.cheryl@epa.gov>; 'tom.mariani@usdoj.gov' <tom.mariani@usdoj.gov>; 'brooks.phillip@epa.gov' <brooks.phillip@epa.gov>
Subject: ExxonMobil Baytown Refinery - Update 1 to Potential Force Majeure Event as a Result of COVID-19

Pursuant to Paragraph 218 of the Consent Decree between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, attached please find Update 1 to the Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Refinery.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
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From: Bowman, Meagan D
Sent: Wednesday, April 8, 2020 5:32 PM
To: 'foley.patrick@epa.gov' <foley.patrick@epa.gov>; 'R6CAACDDeliverables@epa.gov' <R6CAACDDeliverables@epa.gov>; 'jmack@matrixneworld.com' <jmack@matrixneworld.com>; 'neichlin@matrixengineering.com' <neichlin@matrixengineering.com>; 'Lawrence.Starfield@epa.gov' <Lawrence.Starfield@epa.gov>; 'Samuel.Coleman@epa.gov' <Samuel.Coleman@epa.gov>; 'tom.mariani@usdoj.gov' <tom.mariani@usdoj.gov>; 'brooks.phillip@epa.gov' <brooks.phillip@epa.gov>
Subject: ExxonMobil Baytown Refinery - Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19

Pursuant to Paragraph 218 of the Consent Decree between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, attached please find a Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Baytown Refinery.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

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Message

From: Jody Lee Mack [jmack@matrixneworld.com]
Sent: 5/13/2020 6:55:53 PM
To: Parrish, Robert [Parrish.Robert@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; Lundelius, Diana [Lundelius.Diana@epa.gov]
CC: Dan Roper [dan.roper@erg.com]; Burke, Shaun [Burke.Shaun@epa.gov]; Dykes, Teresa [Dykes.Teresa@epa.gov]
Subject: FW: ExxonMobil Baytown Refinery - Update 1 to Potential Force Majeure Event as a Result of COVID-19
Attachments: 20200507 EM BTRF EPA CD Force Majeure Update 1 - COVID19 (Case No. 05-C-....pdf

Attached please find the following for your review:

Deliverable Title: Update 1 to Potential Force Majeure Event as a Result of COVID-19
Deliverable Date: May 7, 2020
Refinery: ExxonMobil - Baytown
Marquee Issue: Force Majeure

Nature of Review: EPA review only

EPA Review and Turnaround Time

Total Review Time (per CD): NA
Due Date for National Expert/Regional Contact to provide comments to Headquarters: NA
Due Date for Headquarters to submit written response to refinery: NA

Completeness Review Conducted by Matrix

Matrix conducted a review of the attached document for completeness purposes only. This review included the following:

- Timely submittal of document (per requirements of CD)
- Document included basic elements set forth in CD
- Completeness of document (i.e. no pages missing)

Attached document appears to contain all requirements set forth in the CD.

From: Bowman, Meagan D <meagan.d.bowman@exxonmobil.com>
Sent: Friday, May 8, 2020 6:36 PM
To: foley.patrick@epa.gov; R6CAACDDeliverables@epa.gov; Jody Lee Mack <jmack@matrixneworld.com>; starfield.lawrence@epa.gov; gray.david@epa.gov; seager.cheryl@epa.gov; tom.mariani@usdoj.gov; brooks.phillip@epa.gov
Subject: ExxonMobil Baytown Refinery - Update 1 to Potential Force Majeure Event as a Result of COVID-19

[EXTERNAL]
Pursuant to Paragraph 218 of the Consent Decree between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, attached please find Update 1 to the Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Refinery.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
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From: Bowman, Meagan D
Sent: Wednesday, April 8, 2020 5:32 PM
To: 'foley.patrick@epa.gov' <foley.patrick@epa.gov>; 'R6CAACDDeliverables@epa.gov' <R6CAACDDeliverables@epa.gov>; 'jmack@matrixneworld.com' <jmack@matrixneworld.com>; 'neichlin@matrixengineering.com' <neichlin@matrixengineering.com>; 'Lawrence.Starfield@epa.gov' <Lawrence.Starfield@epa.gov>; 'Samuel.Coleman@epa.gov' <Samuel.Coleman@epa.gov>; 'tom.mariani@usdoj.gov' <tom.mariani@usdoj.gov>; 'brooks.phillip@epa.gov' <brooks.phillip@epa.gov>
Subject: ExxonMobil Baytown Refinery - Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19

Pursuant to Paragraph 218 of the Consent Decree between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, attached please find a Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Baytown Refinery.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

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Message

From: Bowman, Meagan D [meagan.d.bowman@exxonmobil.com]
Sent: 6/5/2020 8:57:48 PM
To: Foley, Patrick [Foley.Patrick@epa.gov]; R6CAACDDeliverables [R6CAACDDeliverables@epa.gov]; jmack@matrixneworld.com; Starfield, Lawrence [Starfield.Lawrence@epa.gov]; Gray, David [gray.david@epa.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; tom.mariani@usdoj.gov; Brooks, Phillip [Brooks.Phillip@epa.gov]
Subject: ExxonMobil Baytown Refinery - Update 2 to Potential Force Majeure Event as a Result of COVID-19
Attachments: 20200605 EM BTRF EPA CD Force Majeure Update 2 - COVID19 (Case No. 05-C-....pdf

Pursuant to Paragraph 218 of the Consent Decree between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, attached please find Update 2 to the Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Refinery.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

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From: Bowman, Meagan D
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To: 'foley.patrick@epa.gov' <foley.patrick@epa.gov>; 'R6CAACDDeliverables@epa.gov' <R6CAACDDeliverables@epa.gov>; 'jmack@matrixneworld.com' <jmack@matrixneworld.com>; 'starfield.lawrence@epa.gov' <starfield.lawrence@epa.gov>; 'gray.david@epa.gov' <gray.david@epa.gov>; 'seager.cheryl@epa.gov' <seager.cheryl@epa.gov>; 'tom.mariani@usdoj.gov' <tom.mariani@usdoj.gov>; 'brooks.phillip@epa.gov' <brooks.phillip@epa.gov>
Subject: ExxonMobil Baytown Refinery - Update 1 to Potential Force Majeure Event as a Result of COVID-19

Pursuant to Paragraph 218 of the Consent Decree between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, attached please find Update 1 to the Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Refinery.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
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From: Bowman, Meagan D
Sent: Wednesday, April 8, 2020 5:32 PM
To: 'foley.patrick@epa.gov' <foley.patrick@epa.gov>; 'R6CAACDDeliverables@epa.gov' <R6CAACDDeliverables@epa.gov>; 'jmack@matrixneworld.com' <jmack@matrixneworld.com>; 'neichlin@matrixengineering.com' <neichlin@matrixengineering.com>; 'Lawrence.Starfield@epa.gov' <Lawrence.Starfield@epa.gov>; 'Samuel.Coleman@epa.gov' <Samuel.Coleman@epa.gov>; 'tom.mariani@usdoj.gov'

<tom.mariani@usdoj.gov>; 'brooks.phillip@epa.gov' <brooks.phillip@epa.gov>
Subject: ExxonMobil Baytown Refinery - Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19

Pursuant to Paragraph 218 of the Consent Decree between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, attached please find a Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Baytown Refinery.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
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Message

From: Jody Lee Mack [jmack@matrixneworld.com]
Sent: 6/5/2020 4:40:08 PM
To: Foley, Patrick [Foley.Patrick@epa.gov]; Parrish, Robert [Parrish.Robert@epa.gov]; Lundelius, Diana [Lundelius.Diana@epa.gov]
CC: Dan Roper [dan.roper@erg.com]; Burke, Shaun [Burke.Shaun@epa.gov]; Dykes, Teresa [Dykes.Teresa@epa.gov]
Subject: Exxon Mobil Baytown Notification of Potential Force Majeure Event and Request for Enforcement Discretion-COVID-19 Chemical Plant
Attachments: EM FM Baytown Chemical Plan 4-8-20.pdf

Attached please find the following for your review:

Deliverable Title: Notification of Potential Force Majeure Event and Request for Enforcement Discretion-COVID-19 Chemical Plant
Deliverable Date: April 8, 2020
Refinery: ExxonMobil - Baytown
Marquee Issue: Force Majeure

Nature of Review: EPA response required

EPA Review and Turnaround Time

Total Review Time (per CD): 30 days
Due Date for National Expert/Regional Contact to provide comments to Headquarters: 5/1/20
Due Date for Headquarters to submit written response to refinery: Headquarters has until ***5/8/20 (90 days)*** to submit a written response to Baytown

Completeness Review Conducted by Matrix

Matrix conducted a review of the attached document for completeness purposes only. This review included the following:

- Timely submittal of document (per requirements of CD)
- Document included basic elements set forth in CD
- Completeness of document (i.e. no pages missing)

Attached document was submitted within the 30-day requirement set forth in the CD.
Attached document appears to contain all requirements set forth in the CD.

Additional Comments:

Matrix did not receive this document electronically. Therefore, Matrix scanned the document. This and the stay at home requirements associated with COVID-19 is the reason for the delay in distribution.

ExxonMobil

April 8, 2020

Director, Air Enforcement Division
Office of Civil Enforcement
U.S. Environmental Protection Agency
Mail Code 2242-A
1200 Pennsylvania Ave., N.W.
William Jefferson Clinton Building
Room 1119
Washington, DC 20460-0001
CERTIFIED MAIL NO. 7019 1120 0001 9502 4147
RETURN RECEIPT REQUESTED

Re: Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Baytown Chemical Plant

Dear Sirs and Madams:

Pursuant to Paragraphs 88-89 of the Consent Decree ("CD") between the United States, et.al. and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, No. 4:17-cv-3302 (S.D. Tex.), entered on June 6, 2018, this letter provides notice that a Force Majeure event (as defined in Paragraph 88 of the CD) ***may potentially occur*** as a result of the global pandemic outbreak of Coronavirus Disease 2019 ("COVID-19"). ***This notification is being provided out of an abundance of caution to preserve all rights under the CD as the COVID-19 pandemic further develops.*** ExxonMobil continues to take diligent and prudent actions to protect the health and safety of its workers, the public and the environment, and to meet market needs as the COVID-19 pandemic develops. However, this potential Force Majeure event may impact the ability of the ExxonMobil Baytown Chemical Plant ("Baytown Chemical Plant") to comply with various provisions of the CD, as well as federal air, water and/or waste regulations.

The CD requires ExxonMobil to include certain CD requirements in the Title V operating permit. Thus, some of the potential compliance issues identified in this Force Majeure notification may also be potential noncompliance with the Title V operating permit. Similarly, many of the CD requirements relate to federal regulations. This letter advises of potential federal air, water and waste regulatory compliance issues under the CD or other permit(s), and/or federal rules and regulations, generally for the Baytown Chemical Plant. To the extent that exemptions do not apply to any such noncompliance or such issues are deemed to be outside the scope of this notification of potential Force Majeure under the CD or other permit(s), and/or federal rules and regulations, ExxonMobil respectfully requests that EPA exercise enforcement discretion to not seek penalties or other enforcement action for potential noncompliance as a result of a reduced workforce from COVID-19 from the period of **April 8, 2020 to June 30, 2020. This initial period may become extended depending on the nature and severity of the COVID-19 impacts over the next few months, and follow-up notifications will be submitted to provide ongoing updates of any actual compliance impacts.** Please note that should potential compliance issues with state regulatory requirements and/or federal regulatory requirements delegated to the state arise due to COVID-19 impacts, the

Baytown Chemical Plant will request enforcement discretion, as appropriate, from the Texas Commission on Environmental Quality (TCEQ).

The CD specifies that a Force Majeure request must comply with the requirements of Paragraph 89 of the CD and must include an explanation and description of the reasons for the delay; the anticipated duration of the delay; all actions taken or to be taken to prevent or minimize the delay; a schedule for implementing any measures to be taken to prevent or mitigate the delay or the effect of the delay; the rationale for attributing such delay to a Force Majeure, and a statement as to whether, in the opinion of ExxonMobil, such an event may cause or contribute to an endangerment of public health, welfare, or the environment. These elements are described below, organized by the respective potentially impacted CD paragraph, along with a discussion of each element. Generally, the cause or causes of the potential delay or prevented performance is the reduction of staffing and available personnel due to COVID-19. Currently the Baytown Chemical Plant is operational, but COVID-19 has led to changes to normal practices, including implementing measures to reduce worker interactions and additional vulnerabilities as a result of COVID-19.

COVID-19 and Its Impact

Explanation and Description of the Potential Delay or Prevented Performance

COVID-19 affects the lungs and airways, with illnesses ranging from mild symptoms to severe illness and death.[1] The virus is highly communicable, remaining viable for hours to days on surfaces made from a variety of materials.[2] The Centers for Disease Control and Prevention ("CDC") itself has stated that "[m]uch is unknown about how the virus that causes COVID-19 spreads."[3] "Close contact" (within about 6 feet) is the most frequent spread from person-to-person.[4] There is no known treatment or vaccine for COVID-19.[5] The CDC states that "[t]he complete clinical picture with regard to COVID-19 is not fully known."[6] The agency stated that "[t]his is the first pandemic known to be caused by the emergence of a new coronavirus," and admitted that "this is a rapidly evolving situation."[7]

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[1] "Symptoms", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html (accessed March 16, 2020).

[2] "Environmental Cleaning and Disinfection Recommendations," Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html (accessed March 16, 2020).

[3] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).

[4] "Environmental Cleaning and Disinfection Recommendations", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html (accessed March 16, 2020).

[5] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[6] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[7] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

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As the COVID-19 pandemic has developed and become more dire across the country, government entities and Non-Governmental Organizations ("NGOs") have reacted with progressively more stringent recommendations and restrictions. On January 30, 2020, the International Health Regulations Emergency Committee of the World Health Organization ("WHO") labeled the outbreak a "public health emergency of international concern."[8] On January 31, the U.S. Health and Human Services Department declared a public health emergency for international aid.[9] On March 11, the WHO publicly declared COVID-19 as a pandemic. That same day, the Houston Mayor and County Judge of Harris County signed a proclamation declaring a Local State of Disaster Due to a Public Health Emergency in Houston and Harris County, respectively.[10] On March 13, the President of the United States declared the outbreak a national emergency.[11] That same day, the Governor of the State of Texas issued a proclamation that COVID-19 poses an imminent threat of disaster, declaring a state of disaster for all counties in Texas.[12] On March 24, the County Judge of Harris County issued a Stay Home, Work Safe Order effective as of 11:59 p.m. on March 24.[13] Finally, on March 31, the Governor of the State of Texas issued Executive Order GA 14, directing a state-wide order effective at 12:01 a.m. on April 2 through April 30, 2020 to "minimize social gatherings and minimize in-person contact with" non-household members except where necessary to provide or obtain essential services.[14]

As the Occupational Safety and Health Administration ("OSHA") acknowledges, COVID-19 renders wide impacts on absenteeism based on illness, caregiving for sick or the at-risk, and caregiving for school closures.[15] Interrupted supply lines may also cause severe impacts.[16] OSHA specifically recommended flexible telecommuting where possible.[17] OSHA also encouraged minimizing contact among workers, and establishing a reduction in the total number of employees in a facility at a given

---

[8] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[9] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[10] "Mayor Sylvester Turner and Harris County Judge Lina Hidalgo Declare Public Health Emergency Due to COVID-19", Mayor's Office Press Release, http://houstontx.gov/mayor/press/2020/public-health-emergency-declared-covid-19.html (accessed March 23, 2020).

[11] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[12] "Governor Abbott Declares State of Disaster in Texas Due to COVID-19", Office of the Texas Governor, https://gov.texas.gov/news/post/governor-abbott-declares-state-of-disaster-in-texas-due-to-covid-19 (accessed March 16, 2020).

[13] "Stay Home, Work Safe", Order of County Judge Lina Hidalgo, https://www.houston.org/news/harris-county-issues-mandatory-stay-home-work-safe-order (accessed March 26, 2020).

[14] "Executive Order GA 14", https://gov.texas.gov/uploads/files/press/EO-GA14_Statewide_Essential_Service_and_Activity_COVID-19_IMAGE_03-31-2020.pdf (accessed April 2, 2020).

[15] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

[16] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

[17] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

ED_004791B_00000192-00003

time, "allowing them to maintain distance from one another..."[18] Eventually, the CDC recommended that in-person community events of fifty (50) people or more be postponed or cancelled, with a subsequent recommendation by the White House that in-person events of ten (10) people or more be cancelled or postponed between March 16-30[19], currently extended through April 30.

The CDC states that "[a]ll employers need to consider how best to decrease the spread of acute respiratory illness and lower the impact of COVID-19 in their workplace..."[20] The Baytown Chemical Plant has taken and continues to take cautious and reasonable steps to prepare for any COVID-19 impact. The Baytown Chemical Plant followed the cleaning and disinfection recommendations of the CDC for weeks prior to any confirmed case in Baytown or Harris County.[21] The Baytown Chemical Plant also followed established recommendations to avoid the spread of the illness.[22]

The Baytown Chemical Plant has carefully established essential personnel plans. On March 13, the Baytown Chemical Plant transitioned to the "Hot Standby Phase" of its plan, taking steps to facilitate further social distancing and leveraging alternative work locations by shifting operations to "essential personnel" only.

However, as the CDC acknowledges, those plans must be "flexible" given the uncertainties related to the disease and possible community impacts.[23] When planning, the CDC recommended considering factors including:

- The overall number of attendees (*Baytown Chemical Plant employs a workforce of approximately 1,000 employees and also utilizes independent contractors*);
- The number of people attending who are at greater risk of more serious illness after contracting COVID-19 (*Baytown Chemical Plant employs vulnerable employees*);
- The density of attendees within a confined area (*Baytown Chemical Plant normal operations require work within confined areas*);
- The potential economic impact to participants, attendees, staff, and the larger community;
- The level of transmission in your local community, and the level of transmission in the areas from which your attendees will travel (*ExxonMobil is a global company*); and
- If there are ways in which to significantly reduce the number of attendees.[24]

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[18] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).
[19] "Get Your Mass Gatherings or Large Community Events Ready", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/large-events/mass-gatherings-ready-for-covid-19.html (accessed March 16, 2020).
[20] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).
[21] "Environmental Cleaning and Disinfection Recommendations", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html (accessed March 16, 2020).
[22] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).
[23] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).
[24] Get Your Mass Gatherings or Large Community Events Ready", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/large-events/mass-gatherings-ready-for-covid-19.html (accessed March 16, 2020).

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The Baytown Chemical Plant has carefully considered ways in which to significantly reduce the number of on-site personnel while still meeting regulatory obligations. The actions taken by the Baytown Chemical Plant to date have been reasonable and prudent while balancing regulatory obligations and maintaining the health and safety of its workers and the public.

Measures taken at the Baytown Chemical Plant include reducing the number of non-essential employees working on-site to limit exposure of essential personnel to outside persons, proactively reinforcing social distancing and implementing the use of virtual meetings. Personnel were also asked to self-monitor for symptoms; and to self-quarantine if the employee or contractor experienced symptoms of COVID-19, has come in contact with a person with COVID-19, or recently travelled to an area with sustained COVID-19 transmission. In addition, ExxonMobil offered assistance to qualifying employees with childcare needs during school closures to enable on-site presence of essential personnel to maintain safe operations at the Baytown Chemical Plant.

Unfortunately, future developments may impair the ability to fulfill all requirements. Due to what federal and state agencies acknowledge to be a rapidly evolving and unknown progression of the disease in the public, the Baytown Chemical Plant respectfully provides notice that the enclosed may be potential impacts arising from the disease beyond the control of ExxonMobil, despite the exercise of due diligence and making its best efforts to avoid or minimize delays or impediments to performance.

Anticipated Duration of the Potential Delays, and Schedule for Mitigating the Potential Delay or Prevented Performance

ExxonMobil anticipates that the Baytown Chemical Plant will be able to resume normal staffing at the site and return to normal work arrangements/operations **beginning no later than June 30, 2020**. However, due to the uncertainty associated with the rapidly evolving developments of COVID-19, the actual length of time where potential delays or impediments are experienced may be different than originally anticipated. While following recommendations from the CDC and OSHA, and monitoring the community and greater effects of COVID-19, ExxonMobil will make all diligent efforts to protect the health of its employees to maintain safe operation, and to return to normal operations as soon as practical. Updates to the exact timing of resuming normal work arrangements/operations will be included in a follow-up to this letter.

Potential Impacted Issues

As a result of the above-described situation, ExxonMobil believes the expected impact of COVID-19 on the Baytown Chemical Plant qualifies as a potential Force Majeure event pursuant to Paragraphs 88 and 89 of the CD. In addition, to the extent that the effects of this pandemic impact the ability of the Baytown Chemical Plant to comply with federal air, water and/or waste regulations, ExxonMobil requests enforcement discretion during this event for the following enumerated areas for the period from **April 8, 2020 through June 30, 2020**. This time period represents the commencement of potential impacts from COVID-19 to our current best estimate of a return to normal work arrangements/operations.

The following list identifies an initial set of potential compliance issues at the Baytown Chemical Plant that may occur in the initial phases of COVID-19 response. ***It is important to note that these are primarily administrative delays or adjustments to activities which are expected to have minimal to no emissions or environmental impact.*** ExxonMobil's requests and contingency responses are consistent with the March 26, 2020 guidance memo provided by the EPA ("COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program"), and are reasonable and environmentally protective in light of the pandemic impacts acknowledged by EPA's guidance memo.[25] Site emission control and treatment devices and systems remain operational at this time consistent with CD and other federal regulatory obligations:

1. Instrumentation and Monitoring Systems: Specifications, Calibration, Quality Control, and Maintenance [CD Paragraph 25(a)(i)]

   The Baytown Chemical Plant is currently required and able to comply with applicable quality assurance and quality control activities in order to maintain proper operation of CD instruments and analyzers, including required daily, quarterly, and annual QA/QC requirements. The Baytown Chemical Plant will continue to be operated in such a manner so as to maintain proper operation of CD instruments and analyzers to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed daily, quarterly, and/or annual QA/QC requirements.

2. Standard During Instrument Downtime [CD Paragraph 45]

   The Baytown Chemical Plant is currently required to maintain less than 5% downtime for specific instrumentation associated with the Covered Flares. As of the date of this letter, all Covered Flare instrumentation downtime remains less than 5% of total operating time. The Baytown Chemical Plant will continue to be operated in such a manner so as to achieve proper operation and maintenance of each Covered Flare instrumentation system, including the completion of timely repairs to maintain minimal downtime on each system, to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed maintenance and/or repairs on the Covered Flare instrumentation systems. These disruptions may increase downtime on Covered Flare instrumentation systems, which may potentially lead to exceeding 5% of operating time, despite making best efforts to minimize downtime. Should Covered Flare instrumentation downtime occur, the Baytown Chemical Plant will use other instrumentation and systems, as available, to operate Covered Flares to meet the required combustion efficiency standards.

[25] "COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program", Environmental Protection Agency, https://www.epa.gov/coronavirus (accessed March 26, 2020).

3. Fenceline Monitoring Requirements [CD Paragraph 48]

   The Baytown Complex (including the Baytown Chemical Plant) is currently required and able to maintain and to collect samples from 50 passive benzene monitors located around the fenceline of the Baytown Complex. The Baytown Chemical Plant will continue to be operated in such a manner that sample stations are maintained, samples are collected and analyzed in a timely manner and posted to the public website within the required 14-day period to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed sample collection, analysis and/or associated reporting.

   Additionally, if third party shipping vendors and/or laboratories are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to transport collected samples or provide timely analysis of collected samples, respectively, delays or potentially missed holding times may be experienced that could impact bi-weekly sample analysis.

4. Reporting Requirements – First Updated Waste Gas Minimization Plan [CD Paragraph 30] and Semi-Annual Reports [CD Paragraph 66]; and other federal regulations requiring submittal of periodic reports

   The Baytown Chemical Plant is currently required and able to submit numerous periodic reports as required by applicable federal regulations; including the First Updated Waste Gas Minimization Plan ("WGMP") due on June 5, 2020 and the CD Semi-Annual Report, due every six months. The Baytown Chemical Plant will continue to be operated in such a manner that all required reports are accurately completed and submitted timely to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in delayed report submittals as significant effort and coordination across the site is required to complete the reports accurately and in a timely manner.

5. Supplemental Environmental Project [CD Paragraph 49 and CD Appendix 2.1]

   The Baytown Chemical Plant is currently required to complete a tree planting project as part of a Supplemental Environmental Project ("SEP"). The Baytown Chemical Plant will continue to meet the applicable requirements of the SEP to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in delayed SEP completion.

6. Compliance with Title V Permit Conditions and Other Federal Regulatory Requirements

   - Storage Vessels (40 CFR 60 Subparts K, Ka, and Kb; 40 CFR Parts 61 and 63)
     The Baytown Chemical Plant is currently required and able to complete periodic inspections of storage vessels, with the potential for required repairs. The Baytown Chemical Plant will continue to be operated in such a manner that all required inspections and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed inspections and/or repairs.

- Leak Detection and Repair (40 CFR 60 Subpart VV); and other federal regulations with standards for equipment leaks requiring fugitive emissions monitoring
  The Baytown Chemical Plant is currently required and able to complete fugitive emissions monitoring, including periodic rounds for audio, visual and olfactory ("AVO") testing, and repair on some components for which monitoring is required. The Baytown Chemical Plant will continue to be operated in such a manner that all required monitoring and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed monitoring and/or repairs, including repair of components on Delay of Repair. These Delay of Repair components will be repaired or replaced during the next planned shutdown of the respective units.

  If necessary as a result of personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness), alternative monitoring approaches will be evaluated with applicable federal agencies. Alternatives may include Optical Gas Imaging ("OGI") camera monitoring, smaller monitoring crews, etc.; however, these approaches are yet to be determined.

- NESHAP for Benzene Waste Operations (40 CFR 61 Subpart FF); and other federal regulations requiring periodic monitoring of wastewater systems
  The Baytown Chemical Plant is currently required and able to complete inspection, monitoring, and repair of applicable equipment per the requirements in 40 CFR Part 61, Subpart FF, including monitoring and replacement of carbon canisters. In addition, the Baytown Chemical Plant is currently required and able to complete inspection, monitoring, and repair of applicable wastewater equipment per the requirements in other federal regulations (e.g., 40 CFR 63 Subpart G). The Baytown Chemical Plant will continue to be operated in such a manner that all required inspections, monitoring and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed inspections, monitoring and/or repairs.

  The Baytown Chemical Plant will pay particular attention to carbon absorption and treatment devices to ensure proper operations to meet emission and concentration limitations to the maximum extent practical. In most instances, missed or delayed inspections and/or monitoring would not indicate loss of control/treatment capability, but rather foregoing a routine verification step. Operational parameters and conditions provide adequate ability to achieve compliance with applicable standards in the absence of periodic inspections and/or monitoring.

- NESHAP from the Synthetic Organic Chemical Manufacturing Industry – Heat Exchange Systems (40 CFR 63 Subpart F); and other federal regulations requiring Heat Exchange System monitoring
  The Baytown Chemical Plant is currently required and able to complete periodic monitoring of heat exchange systems that have one or more heat exchangers in organic hazardous air pollutant ("HAP") service, with the potential for required repairs. The Baytown Chemical Plant

will continue to be operated in such a manner that all required monitoring and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed monitoring and/or repairs.

- NESHAP for Boilers and Process Heaters (40 CFR 63 Subpart DDDDD)
  The Baytown Chemical Plant is currently required and able to complete periodic boiler and process heater tune-ups. The Baytown Chemical Plant will continue to be operated in such a manner that all required tune-ups are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed tune-ups.

- Continuous Emissions Monitoring Systems ("CEMS") or Continuous Parameter Monitoring Systems ("CPMS") (40 CFR Part 60 Appendices; and other federal regulations requiring continuous monitoring)
  The Baytown Chemical Plant is currently required and able to operate and maintain numerous CEMS and CPMS to demonstrate compliance with various federal requirements. Maintenance of the CEMS includes, but is not limited to, periodic validations, quarterly cylinder gas audits ("CGAs"), annual relative accuracy test audits ("RATAs"), periodic stack tests of associated equipment and/or maintaining CEMS uptime greater than 95% of total operating time. The Baytown Chemical Plant will continue to be operated in such a manner so as to achieve proper operation and maintenance of each instrumentation system, including the completion of timely repairs to maintain minimal downtime on each system, to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed maintenance and/or repairs on these instrumentation systems. These disruptions may increase downtime on regulatory-required instrumentation systems, which may potentially lead to exceeding 5% of operating time, despite taking all reasonable steps to minimize downtime.

  Additionally, if third party vendors are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to perform specific maintenance requirements, then the Baytown Chemical Plant will evaluate if operating parameters associated with the applicable equipment and/or instrumentation system indicate a degradation in performance. This would entail all reasonable steps to allow the site to continue to operate with a good faith belief that emission standards are being met. If the evaluation indicates emission standards continue to be met, then the site will continue to operate the applicable equipment.

- Federal Monitoring, Testing and Recordkeeping Requirements
  The Baytown Chemical Plant is currently required and able to complete periodic inspections, sampling, monitoring, testing, recordkeeping, etc. per the requirements in 40 CFR Parts 60, 61, 63 and 68. The Baytown Chemical Plant will continue to be operated in such a manner that all required inspections, sampling, monitoring, testing, recordkeeping, etc. are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed inspections, sampling, monitoring, testing, recordkeeping, etc.

- Water Regulations (Water Operating Permits)
  The Baytown Chemical Plant is currently required by Texas Pollutant Discharge Elimination System (TPDES) and multi-sector general permits and is able to conduct regular monitoring of storm water discharge. The Baytown Chemical Plant will continue to be operated in such a manner that all required sampling of storm water is completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed sampling and/or analysis.

  Additionally, if third party laboratories are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to provide timely analysis of collected samples, delays or potentially missed holding times may be experienced that could impact monthly Discharge Monitoring Report ("DMR") data.

- Hazardous Waste Management (40 CFR 260 – 280)
  The Baytown Chemical Plant is currently required and able to manage hazardous waste per the applicable Resource Conservation and Recovery Act ("RCRA") federal requirements that regulate how hazardous waste is managed on-site prior to being accepted at a transportation, disposal, and storage facility ("TSDF"). Hazardous waste is subject to specific treatment at the Baytown Chemical Plant, including temporary storage in on-site containers, sampling, analysis of sample results and subsequent waste classification, scheduling disposal with a third party who meets all requirements, and transportation by qualified personnel. The Baytown Chemical Plant will continue to be operated in such a manner to achieve adequate handling of hazardous waste, including taking all reasonable steps to expedite shipments of wastes to meet current 90-day on-site retention requirements. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may impact the availability of qualified personnel to complete each of these tasks in order to ship hazardous waste to a TSDF within 90 days.

  Additionally, if third party shipping vendors are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to provide the necessary drivers for transportation or if approved disposal facilities are closed, then the Baytown Chemical Plant may be required to retain wastes on-site until the next available opportunity to ship the wastes.

- Chemical Accident Prevention Provisions (40 CFR Part 68)
  The Baytown Chemical Plant is currently required and able to comply with 40 CFR Part 68, commonly referred to as the Risk Management Program. The Baytown Chemical Plant will continue to be operated in such a manner that all applicable requirements are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in potential documentation issues and/or delays, as summarized in the table below:

Citation	Activity
40 CFR 68.73	- Documentation of training compliance may be impacted by the pandemic (either due to precautionary conditions or actual illness) due to inability to access database / intranet remotely - Inspection and testing frequency may be impacted by the pandemic (either due to precautionary conditions or actual illness), resulting in the need for potential extensions - Timeliness of deficiency mitigation may be impacted by the pandemic (either due to precautionary conditions or actual illness) In the event that inspections and/or mitigation steps require extension, appropriate risk assessment protocols will be followed to document the deferral decision.
40 CFR 68.67 (f)	- Unit Process Hazard Analyses ("PHAs") may be impacted by the pandemic (either due to precautionary conditions or actual illness), resulting in potential delays beyond the required 5 year update
40 CFR 68.71(b)	- 3-year refresher training may be impacted by the pandemic (either due to precautionary conditions or actual illness) due to inability to access database / intranet remotely. In the event that 3-year refresher training goes overdue, refresher training would be completed as expeditiously as possible following the return to normal work arrangements/operations.

Should any reporting be required associated with the above items in the event compliance is prevented by Force Majeure, it will be completed as required in the CD and/or in applicable federal regulations, including Title V.

As of the date of this letter, the Baytown Chemical Plant has not noted any regulatory compliance issues with the standards enumerated in the CD or other applicable federal regulations and permits at the Baytown Chemical Plant as a result of the impacts of COVID-19. It is possible that with the spreading and widening impacts of the COVID-19 pandemic that potential noncompliance may be identified, despite ExxonMobil's best efforts and taking all reasonable steps to maintain safe, reliable, and compliant operations. All reasonable efforts will be made by ExxonMobil to ensure compliance with the CD and other applicable federal regulations and permits, and ExxonMobil will make its best efforts to complete the requirements in an expeditious fashion should undesired delays or impediments occur due to the pandemic. Although ExxonMobil does not currently anticipate compliance impacts, ExxonMobil reserves the right to identify additional impacts to which Force Majeure may apply.

If necessary, a follow-up letter will be submitted to provide an update on any impacts from the pandemic experienced by the Baytown Chemical Plant. Additional updates will be provided throughout the duration of the pandemic period, as needed. Should you have any questions or concerns regarding this submittal, please contact Meagan Bowman at (346) 259-2345 or meagan.d.bowman@exxonmobil.com.

Sincerely,

Jeffrey K. Kovacs, P.E.
Baytown Complex SSHE Manager

cc:

Associate Director
Air, Toxics, and Inspections Coordination
Branch (6 EN-A)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270
CERTIFIED MAIL NO. 7019 1120 0001 9502 3553
RETURN RECEIPT REQUESTED

EES Case Management Unit
Environmental and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044-7611
CERTIFIED MAIL NO. 7019 1120 0001 9502 3591
RETURN RECEIPT REQUESTED

Andrew A. Bobb
Assistant U.S. Attorney
United States Attorney's Office for the Southern District of Texas
1000 Louisiana St., Suite 2300
Houston, TX 77002
CERTIFIED MAIL NO. 7019 1120 0001 9502 3607
RETURN RECEIPT REQUESTED

Director, Air Enforcement Division
Office of Regulatory Enforcement
c/o Matrix New World Engineering, Inc.
26 Columbia Turnpike
Florham Park, NJ 07932
CERTIFIED MAIL NO. 7019 1120 0001 9502 4154
RETURN RECEIPT REQUESTED

Mr. Andrew Wheeler
Environmental Protection Agency Administrator
EPA Administrator Mail Code 1101A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 1120 0001 9502 4161
RETURN RECEIPT REQUESTED

Mr. Lawrence Starfield
Environmental Protection Agency Principal Deputy Assistant Administrator
EPA Administrator Mail Code 2201A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 1120 0001 9502 4178
RETURN RECEIPT REQUESTED

Mr. David Ross
Environmental Protection Agency Acting Assistant Administrator
EPA Office of Water, Mail Code 4101A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 1120 0001 9502 3713
RETURN RECEIPT REQUESTED

Mr. Ken McQueen
Environmental Protection Agency Region 6 Regional Administrator
1201 Elm Street, Suite 500
Dallas, TX 75270
CERTIFIED MAIL NO. 7019 1120 0001 9502 3720
RETURN RECEIPT REQUESTED

Mr. Toby Baker
Executive Director
Texas Commission on Environmental Quality
P.O. Box 13087, MC-109
Austin, TX 78711-3087
CERTIFIED MAIL NO. 7019 1120 0001 9502 3737
RETURN RECEIPT REQUESTED

Ms. Nicole Bealle
Regional Director
Texas Commission on Environmental Quality Region 12
5425 Polk Street, Suite H
Houston, TX 77023-1452
CERTIFIED MAIL NO. 7019 1120 0001 9502 3744
RETURN RECEIPT REQUESTED

Electronic copies via e-mail to: *eescdcopy.enrd@usdoj.gov*
parrish.robert@epa.gov
foley.patrick@epa.gov
osbourne.margaret@epa.gov

Message

From: Jody Lee Mack [jmack@matrixneworld.com]
Sent: 6/5/2020 4:07:57 PM
To: Parrish, Robert [Parrish.Robert@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; Lundelius, Diana [Lundelius.Diana@epa.gov]
CC: Dan Roper [dan.roper@erg.com]; Burke, Shaun [Burke.Shaun@epa.gov]; Dykes, Teresa [Dykes.Teresa@epa.gov]
Subject: Exxon Mobil Baytown Notification of Potential Force Majeure Event and Request for Enforcement Discretion-COVID-19 Mont Belvieu
Attachments: EM Baytown FM 4-7-20.pdf

Attached please find the following for your review:

Deliverable Title: Notification of Potential Force Majeure Event and Request for Enforcement Discretion-COVID-19 Mont Belvieu
Deliverable Date: April 7, 2020
Refinery: ExxonMobil - Baytown
Marquee Issue: Force Majeure

Nature of Review: EPA response required

EPA Review and Turnaround Time

Total Review Time (per CD): 30 days
Due Date for National Expert/Regional Contact to provide comments to Headquarters: 4/30/20
Due Date for Headquarters to submit written response to refinery: Headquarters has until ***5/7/20 (30 days)*** to submit a written response to Baytown

Completeness Review Conducted by Matrix

Matrix conducted a review of the attached document for completeness purposes only. This review included the following:

- Timely submittal of document (per requirements of CD)
- Document included basic elements set forth in CD
- Completeness of document (i.e. no pages missing)

Attached document was submitted within the 30-day requirement set forth in the CD.
Attached document appears to contain all requirements set forth in the CD.

Additional Comments:

Matrix did not receive this document electronically. Therefore, Matrix scanned the document. This and the stay at home requirements associated with COVID-19 is the reason for the delay in distribution.

Message

From: Bowman, Meagan D [meagan.d.bowman@exxonmobil.com]
Sent: 5/8/2020 10:36:19 PM
To: Foley, Patrick [Foley.Patrick@epa.gov]; R6CAACDDeliverables [R6CAACDDeliverables@epa.gov]; jmack@matrixneworld.com; Starfield, Lawrence [Starfield.Lawrence@epa.gov]; Gray, David [gray.david@epa.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; tom.mariani@usdoj.gov; Brooks, Phillip [Brooks.Phillip@epa.gov]
Subject: ExxonMobil Baytown Refinery - Update 1 to Potential Force Majeure Event as a Result of COVID-19
Attachments: 20200507 EM BTRF EPA CD Force Majeure Update 1 - COVID19 (Case No. 05-C-....pdf

Pursuant to Paragraph 218 of the Consent Decree between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, attached please find Update 1 to the Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Refinery.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
5000 Bayway Drive, CAB W-121a
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Lync: 346.259.2345
Mobile: 281.917.5014
Fax: 346.259.5788

From: Bowman, Meagan D
Sent: Wednesday, April 8, 2020 5:32 PM
To: 'foley.patrick@epa.gov' <foley.patrick@epa.gov>; 'R6CAACDDeliverables@epa.gov' <R6CAACDDeliverables@epa.gov>; 'jmack@matrixneworld.com' <jmack@matrixneworld.com>; 'neichlin@matrixengineering.com' <neichlin@matrixengineering.com>; 'Lawrence.Starfield@epa.gov' <Lawrence.Starfield@epa.gov>; 'Samuel.Coleman@epa.gov' <Samuel.Coleman@epa.gov>; 'tom.mariani@usdoj.gov' <tom.mariani@usdoj.gov>; 'brooks.phillip@epa.gov' <brooks.phillip@epa.gov>
Subject: ExxonMobil Baytown Refinery - Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19

Pursuant to Paragraph 218 of the Consent Decree between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, attached please find a Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Baytown Refinery.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

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Message

From: Bowman, Meagan D [meagan.d.bowman@exxonmobil.com]
Sent: 4/8/2020 10:33:10 PM
To: Foley, Patrick [Foley.Patrick@epa.gov]; R6CAACDDeliverables [R6CAACDDeliverables@epa.gov]; jmack@matrixneworld.com; neichlin@matrixengineering.com; Lawrence.Starfield@epa.gov; Samuel.Coleman@epa.gov; tom.mariani@usdoj.gov; Brooks, Phillip [Brooks.Phillip@epa.gov]
Subject: ExxonMobil Baytown Refinery - Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19
Attachments: 20200408 EM BTRF EPA CD Force Majeure Notification - COVID19 (Case No. 0....pdf

Pursuant to Paragraph 218 of the Consent Decree between the United States and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, Case No. 05-C-5809, attached please find a Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Baytown Refinery.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

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Message

From: Bowman, Meagan D [meagan.d.bowman@exxonmobil.com]
Sent: 6/5/2020 9:02:59 PM
To: eescdcopy.enrd@usdoj.gov; Parrish, Robert [Parrish.Robert@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: ExxonMobil Baytown Olefins Plant - Update 2 to Potential Force Majeure Event as a Result of COVID-19
Attachments: 20200605 EM BOP EPA CD Force Majeure Update 2 - COVID19 (No. 4 17-cv-330....pdf

Pursuant to Paragraphs 88-89 of the Consent Decree between the United States, et al. and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, No. 4:17-cv-3302 (S.D. Tex.), attached please find Update 2 to the Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Olefins Plant.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

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From: Bowman, Meagan D
Sent: Friday, May 8, 2020 5:42 PM
To: 'eescdcopy.enrd@usdoj.gov' <eescdcopy.enrd@usdoj.gov>; 'parrish.robert@epa.gov' <parrish.robert@epa.gov>; 'foley.patrick@epa.gov' <foley.patrick@epa.gov>; 'osbourne.margaret@epa.gov' <osbourne.margaret@epa.gov>
Subject: ExxonMobil Baytown Olefins Plant - Update 1 to Potential Force Majeure Event as a Result of COVID-19

Pursuant to Paragraphs 88-89 of the Consent Decree between the United States, et al. and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, No. 4:17-cv-3302 (S.D. Tex.), attached please find Update 1 to the Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Olefins Plant.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

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From: Bowman, Meagan D
Sent: Wednesday, April 8, 2020 5:34 PM
To: 'eescdcopy.enrd@usdoj.gov' <eescdcopy.enrd@usdoj.gov>; 'parrish.robert@epa.gov' <parrish.robert@epa.gov>; 'foley.patrick@epa.gov' <foley.patrick@epa.gov>; 'osbourne.margaret@epa.gov' <osbourne.margaret@epa.gov>
Subject: ExxonMobil Baytown Olefins Plant - Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19

Pursuant to Paragraphs 88-89 of the Consent Decree between the United States, et al. and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, No. 4:17-cv-3302 (S.D. Tex.), attached please find a Notification of

Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Baytown Olefins Plant.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
5000 Bayway Drive, CAB W-121a
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Mobile: 281.917.5014
Fax: 346.259.5788

Exxon Mobil Corporation
3525 Decker Drive
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ExxonMobil

June 5, 2020

Director, Air Enforcement Division
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U.S. Environmental Protection Agency
Mail Code 2242-A
1200 Pennsylvania Ave., N.W.
William Jefferson Clinton Building
Room 1119
Washington, DC 20460-0001
CERTIFIED MAIL NO. 7019 1120 0001 9502 6516
RETURN RECEIPT REQUESTED

Re: Update 2 to Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Olefins Plant

Dear Sirs and Madams:

Pursuant to Paragraphs 88-89 of the Consent Decree ("CD") between the United States, et.al. and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, No. 4:17-cv-3302 (S.D. Tex.), entered on June 6, 2018, the ExxonMobil Baytown Olefins Plant submitted notification dated April 8, 2020, that a Force Majeure event (as defined in Paragraph 88 of the CD) may potentially occur as a result of the global pandemic outbreak of Coronavirus Disease 2019 ("COVID-19"). The ExxonMobil Baytown Olefins Plant subsequently submitted an update to the initial notification dated May 7, 2020.

In subsequent correspondence, EPA has acknowledged receipt of these notifications and also acknowledged that potential impacts could result from COVID-19, but reserved judgment on Force Majeure claims until specific impacts to regulatory obligations were incurred.

ExxonMobil continues to take diligent and prudent actions to protect the health and safety of its workers, the public and the environment, and to meet market needs as the COVID-19 pandemic continues. As of the date of this letter, no potential compliance issues have arisen since our initial notification, and more importantly, the ExxonMobil Baytown Olefins Plant has been able to successfully meet its regulatory obligations under the CD. While there are promising developments in the global COVID-19 pandemic response, the situation remains quite fluid. ExxonMobil is faced with unprecedented challenges and constraints in refining, fuel, and chemical supply and demand chains, as well as personnel restrictive measures (e.g., stay at home orders, travel restrictions, illness, and precautionary exposure protection measures). As such, ExxonMobil still considers the potential Force Majeure an on-going situation and the initial notification still active.

ExxonMobil will continue to provide follow-up communications, as needed, if potential compliance issues are identified. Should you have any questions or concerns regarding this submittal, please contact Meagan Bowman at (346) 259-2345 or meagan.d.bowman@exxonmobil.com.

Sincerely,

Robert Hill
Baytown Olefins Plant SSHE Manager

cc:
Associate Director
Air, Toxics, and Inspections Coordination
Branch (6 EN-A)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
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EES Case Management Unit
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Mr. Andrew Wheeler
Environmental Protection Agency Administrator
EPA Administrator Mail Code 1101A
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Mr. Lawrence Starfield
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Mr. David Ross
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1200 Pennsylvania Ave, N. W.
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Mr. Ken McQueen
Environmental Protection Agency Region 6 Regional Administrator
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Mr. Toby Baker
Executive Director
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Austin, TX 78711-3087
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RETURN RECEIPT REQUESTED

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Ms. Nicole Bealle
Regional Director
Texas Commission on Environmental Quality Region 12
5425 Polk Street, Suite H
Houston, TX 77023-1452
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parrish.robert@epa.gov
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ED_004791B_00000207-00004

Message

From: Bowman, Meagan D [meagan.d.bowman@exxonmobil.com]
Sent: 6/5/2020 8:59:55 PM
To: eescdcopy.enrd@usdoj.gov; Parrish, Robert [Parrish.Robert@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: ExxonMobil Baytown Chemical Plant - Update 2 to Potential Force Majeure Event as a Result of COVID-19
Attachments: 20200605 EM BTCP EPA CD Force Majeure Update 2 - COVID19 (No. 4 17-cv-33....pdf

Pursuant to Paragraphs 88-89 of the Consent Decree between the United States, et.al. and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, No. 4:17-cv-3302 (S.D. Tex.), attached please find Update 2 to the Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Chemical Plant.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
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From: Bowman, Meagan D
Sent: Friday, May 8, 2020 5:39 PM
To: 'eescdcopy.enrd@usdoj.gov' <eescdcopy.enrd@usdoj.gov>; 'parrish.robert@epa.gov' <parrish.robert@epa.gov>; 'foley.patrick@epa.gov' <foley.patrick@epa.gov>; 'osbourne.margaret@epa.gov' <osbourne.margaret@epa.gov>
Subject: ExxonMobil Baytown Chemical Plant - Update 1 to Potential Force Majeure Event as a Result of COVID-19

Pursuant to Paragraphs 88-89 of the Consent Decree between the United States, et.al. and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, No. 4:17-cv-3302 (S.D. Tex.), attached please find Update 1 to the Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Chemical Plant.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
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From: Bowman, Meagan D
Sent: Wednesday, April 8, 2020 5:33 PM
To: 'eescdcopy.enrd@usdoj.gov' <eescdcopy.enrd@usdoj.gov>; 'parrish.robert@epa.gov' <parrish.robert@epa.gov>; 'foley.patrick@epa.gov' <foley.patrick@epa.gov>; 'osbourne.margaret@epa.gov' <osbourne.margaret@epa.gov>
Subject: ExxonMobil Baytown Chemical Plant - Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19

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Meagan D. Bowman
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June 5, 2020

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RETURN RECEIPT REQUESTED

Re: Update 2 to Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Chemical Plant

Dear Sirs and Madams:

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ExxonMobil will continue to provide follow-up communications, as needed, if potential compliance issues are identified. Should you have any questions or concerns regarding this submittal, please contact Meagan Bowman at (346) 259-2345 or meagan.d.bowman@exxonmobil.com.

Sincerely,

Jeffrey K. Kovacs, P.E.
Baytown Complex SSHE Manager

cc:
Associate Director
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Mr. Andrew Wheeler
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Mr. Lawrence Starfield
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Mr. Ken McQueen
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Message

From: Bowman, Meagan D [meagan.d.bowman@exxonmobil.com]
Sent: 4/8/2020 10:34:04 PM
To: eescdcopy.enrd@usdoj.gov; Parrish, Robert [Parrish.Robert@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: ExxonMobil Baytown Olefins Plant - Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19
Attachments: 20200408 EM BOP EPA CD Force Majeure Notification - COVID19 (No. 4 17-cv....pdf

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Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

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ExxonMobil

April 8, 2020

Director, Air Enforcement Division
Office of Civil Enforcement
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1200 Pennsylvania Ave., N.W.
William Jefferson Clinton Building
Room 1119
Washington, DC 20460-0001
CERTIFIED MAIL NO. 7019 1120 0001 9502 3751
RETURN RECEIPT REQUESTED

Re: Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Baytown Olefins Plant

Dear Sirs and Madams:

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The CD requires ExxonMobil to include certain CD requirements in the Title V operating permit. Thus, some of the potential compliance issues identified in this Force Majeure notification may also be potential noncompliance with the Title V operating permit. Similarly, many of the CD requirements relate to federal regulations. This letter advises of potential federal air, water and waste regulatory compliance issues under the CD or other permit(s), and/or federal rules and regulations, generally for the Baytown Olefins Plant. To the extent that exemptions do not apply to any such noncompliance or such issues are deemed to be outside the scope of this notification of potential Force Majeure under the CD or other permit(s), and/or federal rules and regulations, ExxonMobil respectfully requests that EPA exercise enforcement discretion to not seek penalties or other enforcement action for potential noncompliance as a result of a reduced workforce from COVID-19 from the period of **April 8, 2020 to June 30, 2020. This initial period may become extended depending on the nature and severity of the COVID-19 impacts over the next few months, and follow-up notifications will be submitted to provide ongoing updates of any actual compliance impacts.** Please note that should potential compliance issues with state regulatory requirements and/or federal regulatory requirements delegated to the state arise due to COVID-19 impacts, the

Baytown Olefins Plant will request enforcement discretion, as appropriate, from the Texas Commission on Environmental Quality (TCEQ).

The CD specifies that a Force Majeure request must comply with the requirements of Paragraph 89 of the CD and must include an explanation and description of the reasons for the delay; the anticipated duration of the delay; all actions taken or to be taken to prevent or minimize the delay; a schedule for implementing any measures to be taken to prevent or mitigate the delay or the effect of the delay; the rationale for attributing such delay to a Force Majeure, and a statement as to whether, in the opinion of ExxonMobil, such an event may cause or contribute to an endangerment of public health, welfare, or the environment. These elements are described below, organized by the respective potentially impacted CD paragraph, along with a discussion of each element. Generally, the cause or causes of the potential delay or prevented performance is the reduction of staffing and available personnel due to COVID-19. Currently the Baytown Olefins Plant is operational, but COVID-19 has led to changes to normal practices, including implementing measures to reduce worker interactions and additional vulnerabilities as a result of COVID-19.

COVID-19 and Its Impact

Explanation and Description of the Potential Delay or Prevented Performance

COVID-19 affects the lungs and airways, with illnesses ranging from mild symptoms to severe illness and death.[1] The virus is highly communicable, remaining viable for hours to days on surfaces made from a variety of materials.[2] The Centers for Disease Control and Prevention ("CDC") itself has stated that "[m]uch is unknown about how the virus that causes COVID-19 spreads."[3] "Close contact" (within about 6 feet) is the most frequent spread from person-to-person.[4] There is no known treatment or vaccine for COVID-19.[5] The CDC states that "[t]he complete clinical picture with regard to COVID-19 is not fully known."[6] The agency stated that "[t]his is the first pandemic known to be caused by the emergence of a new coronavirus," and admitted that "this is a rapidly evolving situation."[7]

---

[1] "Symptoms", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html (accessed March 16, 2020).

[2] "Environmental Cleaning and Disinfection Recommendations", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html (accessed March 16, 2020).

[3] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).

[4] "Environmental Cleaning and Disinfection Recommendations", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html (accessed March 16, 2020).

[5] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[6] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[7] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

As the COVID-19 pandemic has developed and become more dire across the country, government entities and Non-Governmental Organizations ("NGOs") have reacted with progressively more stringent recommendations and restrictions. On January 30, 2020, the International Health Regulations Emergency Committee of the World Health Organization ("WHO") labeled the outbreak a "public health emergency of international concern."[8] On January 31, the U.S. Health and Human Services Department declared a public health emergency for international aid.[9] On March 11, the WHO publicly declared COVID-19 as a pandemic. That same day, the Houston Mayor and County Judge of Harris County signed a proclamation declaring a Local State of Disaster Due to a Public Health Emergency in Houston and Harris County, respectively.[10] On March 13, the President of the United States declared the outbreak a national emergency.[11] That same day, the Governor of the State of Texas issued a proclamation that COVID-19 poses an imminent threat of disaster, declaring a state of disaster for all counties in Texas.[12] On March 24, the County Judge of Harris County issued a Stay Home, Work Safe Order effective as of 11:59 p.m. on March 24.[13] Finally, on March 31, the Governor of the State of Texas issued Executive Order GA 14, directing a state-wide order effective at 12:01 a.m. on April 2 through April 30, 2020 to "minimize social gatherings and minimize in-person contact with" non-household members except where necessary to provide or obtain essential services.[14]

As the Occupational Safety and Health Administration ("OSHA") acknowledges, COVID-19 renders wide impacts on absenteeism based on illness, caregiving for sick or the at-risk, and caregiving for school closures.[15] Interrupted supply lines may also cause severe impacts.[16] OSHA specifically recommended flexible telecommuting where possible.[17] OSHA also encouraged minimizing contact among workers, and establishing a reduction in the total number of employees in a facility at a given

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[8] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[9] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[10] "Mayor Sylvester Turner and Harris County Judge Lina Hidalgo Declare Public Health Emergency Due to COVID-19", Mayor's Office Press Release, http://houstontx.gov/mayor/press/2020/public-health-emergency-declared-covid-19.html (accessed March 23, 2020).

[11] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[12] "Governor Abbott Declares State of Disaster in Texas Due to COVID-19", Office of the Texas Governor, https://gov.texas.gov/news/post/governor-abbott-declares-state-of-disaster-in-texas-due-to-covid-19 (accessed March 16, 2020).

[13] "Stay Home, Work Safe", Order of County Judge Lina Hidalgo, https://www.houston.org/news/harris-county-issues-mandatory-stay-home-work-safe-order (accessed March 26, 2020).

[14] "Executive Order GA 14", https://gov.texas.gov/uploads/files/press/EO-GA 14_Statewide_Essential_Service_and_Activity_COVID-19_IMAGE_03-31-2020.pdf (accessed April 2, 2020).

[15] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

[16] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

[17] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

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time, "allowing them to maintain distance from one another..."[18] Eventually, the CDC recommended that in-person community events of fifty (50) people or more be postponed or cancelled, with a subsequent recommendation by the White House that in-person events of ten (10) people or more be cancelled or postponed between March 16-30[19], currently extended through April 30.

The CDC states that "[a]ll employers need to consider how best to decrease the spread of acute respiratory illness and lower the impact of COVID-19 in their workplace..."[20] The Baytown Olefins Plant has taken and continues to take cautious and reasonable steps to prepare for any COVID-19 impact. The Baytown Olefins Plant followed the cleaning and disinfection recommendations of the CDC for weeks prior to any confirmed case in Baytown or Harris County.[21] The Baytown Olefins Plant also followed established recommendations to avoid the spread of the illness.[22]

The Baytown Olefins Plant has carefully established essential personnel plans. On March 13, the Baytown Olefins Plant transitioned to the "Hot Standby Phase" of its plan, taking steps to facilitate further social distancing and leveraging alternative work locations by shifting operations to "essential personnel" only.

However, as the CDC acknowledges, those plans must be "flexible" given the uncertainties related to the disease and possible community impacts.[23] When planning, the CDC recommended considering factors including:

- The overall number of attendees (*Baytown Olefins Plant employs a workforce of approximately 600 employees and also utilizes independent contractors)*;
- The number of people attending who are at greater risk of more serious illness after contracting COVID-19 *(Baytown Olefins Plant employs vulnerable employees)*;
- The density of attendees within a confined area *(Baytown Olefins Plant normal operations require work within confined areas)*;
- The potential economic impact to participants, attendees, staff, and the larger community;
- The level of transmission in your local community, and the level of transmission in the areas from which your attendees will travel (*ExxonMobil is a global company)*; and
- If there are ways in which to significantly reduce the number of attendees.[24]

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[18] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).
[19] "Get Your Mass Gatherings or Large Community Events Ready", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/large-events/mass-gatherings-ready-for-covid-19.html (accessed March 16, 2020).
[20] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).
[21] "Environmental Cleaning and Disinfection Recommendations," Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html (accessed March 16, 2020).
[22] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).
[23] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).
[24] Get Your Mass Gatherings or Large Community Events Ready", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/large-events/mass-gatherings-ready-for-covid-19.html (accessed March 16, 2020).

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The Baytown Olefins Plant has carefully considered ways in which to significantly reduce the number of on-site personnel while still meeting regulatory obligations. The actions taken by the Baytown Olefins Plant to date have been reasonable and prudent while balancing regulatory obligations and maintaining the health and safety of its workers and the public.

Measures taken at the Baytown Olefins Plant include reducing the number of non-essential employees working on-site to limit exposure of essential personnel to outside persons, proactively reinforcing social distancing and implementing the use of virtual meetings. Personnel were also asked to self-monitor for symptoms; and to self-quarantine if the employee or contractor experienced symptoms of COVID-19, has come in contact with a person with COVID-19, or recently travelled to an area with sustained COVID-19 transmission. In addition, ExxonMobil offered assistance to qualifying employees with childcare needs during school closures to enable on-site presence of essential personnel to maintain safe operations at the Baytown Olefins Plant.

Unfortunately, future developments may impair the ability to fulfill all requirements. Due to what federal and state agencies acknowledge to be a rapidly evolving and unknown progression of the disease in the public, the Baytown Olefins Plant respectfully provides notice that the enclosed may be potential impacts arising from the disease beyond the control of ExxonMobil, despite the exercise of due diligence and making best efforts to avoid or minimize delays or impediments to performance.

Anticipated Duration of the Potential Delays, and Schedule for Mitigating the Potential Delay or Prevented Performance

ExxonMobil anticipates that the Baytown Olefins Plant will be able to resume normal staffing at the site and return to normal work arrangements/operations **beginning no later than June 30, 2020**. However, due to the uncertainty associated with the rapidly evolving developments of COVID-19, the actual length of time where potential delays or impediments are experienced may be different than originally anticipated. While following recommendations from the CDC and OSHA, and monitoring the community and greater effects of COVID-19, ExxonMobil will make all diligent efforts to protect the health of its employees to maintain safe operation, and to return to normal operations as soon as practical. Updates to the exact timing of resuming normal work arrangements/operations will be included in a follow-up to this letter.

Potential Impacted Issues

As a result of the above-described situation, ExxonMobil believes the expected impact of COVID-19 on the Baytown Olefins Plant qualifies as a potential Force Majeure event pursuant to Paragraphs 88 and 89 of the CD. In addition, to the extent that the effects of this pandemic impact the ability of the Baytown Olefins Plant to comply with federal air, water and/or waste regulations, ExxonMobil requests enforcement discretion during this event for the following enumerated areas for the period from **April 8, 2020 through June 30, 2020**. This time period represents the commencement of potential impacts from COVID-19 to our current best estimate of a return to normal work arrangements/operations.

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The following list identifies an initial set of potential compliance issues at the Baytown Olefins Plant that may occur in the initial phases of COVID-19 response. ***It is important to note that these are primarily administrative delays or adjustments to activities which are expected to have minimal to no emissions or environmental impact.*** ExxonMobil's requests and contingency responses are consistent with the March 26, 2020 guidance memo provided by the EPA ("COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program"), and are reasonable and environmentally protective in light of the pandemic impacts acknowledged by EPA's guidance memo.[25] Site emission control and treatment devices and systems remain operational at this time consistent with CD and other federal regulatory obligations:

1. Instrumentation and Monitoring Systems: Specifications, Calibration, Quality Control, and Maintenance [CD Paragraph 25(a)(i)]

   The Baytown Olefins Plant is currently required and able to comply with applicable quality assurance and quality control activities in order to maintain proper operation of CD instruments and analyzers, including required daily, quarterly, and annual QA/QC requirements. The Baytown Olefins Plant will continue to be operated in such a manner so as to maintain proper operation of CD instruments and analyzers to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed daily, quarterly, and/or annual QA/QC requirements.

2. Standard During Instrument Downtime [CD Paragraph 45]

   The Baytown Olefins Plant is currently required to maintain less than 5% downtime for specific instrumentation associated with the Covered Flares. As of the date of this letter, all Covered Flare instrumentation downtime remains less than 5% of total operating time. The Baytown Olefins Plant will continue to be operated in such a manner so as to achieve proper operation and maintenance of each Covered Flare instrumentation system, including the completion of timely repairs to maintain minimal downtime on each system, to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed maintenance and/or repairs on the Covered Flare instrumentation systems. These disruptions may increase downtime on Covered Flare instrumentation systems, which may potentially lead to exceeding 5% of operating time, despite making best efforts to minimize downtime. Should Covered Flare instrumentation downtime occur, the Baytown Olefins Plant will use other instrumentation and systems, as available, to operate Covered Flares to meet the required combustion efficiency standards.

3. Fenceline Monitoring Requirements [CD Paragraph 48]

   The Baytown Olefins Plant is currently required and able to maintain and to collect samples from 15 passive benzene monitors located around the fenceline of the site. The Baytown Olefins Plant

[25] "COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program", Environmental Protection Agency, https://www.epa.gov/coronavirus (accessed March 26, 2020).

will continue to be operated in such a manner that sample stations are maintained, samples are collected and analyzed in a timely manner and posted to the public website within the required 14-day period to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed sample collection, analysis and/or associated reporting.

Additionally, if third party shipping vendors and/or laboratories are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to transport collected samples or provide timely analysis of collected samples, respectively, delays or potentially missed holding times may be experienced that could impact bi-weekly sample analysis.

4. Reporting Requirements – First Updated Waste Gas Minimization Plan [CD Paragraph 30] and Semi-Annual Reports [CD Paragraph 66]; and other federal regulations requiring submittal of periodic reports

   The Baytown Olefins Plant is currently required and able to submit numerous periodic reports as required by applicable federal regulations; including the First Updated Waste Gas Minimization Plan ("WGMP") due on June 5, 2020 and the CD Semi-Annual Report, due every six months. The Baytown Olefins Plant will continue to be operated in such a manner that all required reports are accurately completed and submitted timely to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in delayed report submittals as significant effort and coordination across the site is required to complete the reports accurately and in a timely manner.

5. Supplemental Environmental Project [CD Paragraph 49 and CD Appendix 2.1]

   The Baytown Olefins Plant is currently required to complete a tree planting project as part of a Supplemental Environmental Project ("SEP"). The Baytown Olefins Plant will continue to meet the applicable requirements of the SEP to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in delayed SEP completion.

6. Compliance with Title V Permit Conditions and Other Federal Regulatory Requirements

   - Storage Vessels (40 CFR 60 Subparts K, Ka, and Kb; 40 CFR Parts 61 and 63)
     The Baytown Olefins Plant is currently required and able to complete periodic inspections of storage vessels, with the potential for required repairs. The Baytown Olefins Plant will continue to be operated in such a manner that all required inspections and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed inspections and/or repairs.

   - NESHAP for Benzene Waste Operations (40 CFR 61 Subpart FF); and other federal regulations requiring periodic monitoring of wastewater systems
     The Baytown Olefins Plant is currently required and able to complete inspection, monitoring, and repair of applicable equipment per the requirements in 40 CFR Part 61, Subpart FF,

including monitoring and replacement of carbon canisters. In addition, the Baytown Olefins Plant is currently required and able to complete inspection, monitoring, and repair of applicable wastewater equipment per the requirements in other federal regulations (e.g., 40 CFR 63 Subpart G). The Baytown Olefins Plant will continue to be operated in such a manner that all required inspections, monitoring and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed inspections, monitoring and/or repairs.

The Baytown Olefins Plant will pay particular attention to carbon absorption and treatment devices to ensure proper operations to meet emission and concentration limitations to the maximum extent practical. In most instances, missed or delayed inspections and/or monitoring would not indicate loss of control/treatment capability, but rather foregoing a routine verification step. Operational parameters and conditions provide adequate ability to achieve compliance with applicable standards in the absence of periodic inspections and/or monitoring.

- Leak Detection and Repair (40 CFR 63 Subpart UU); and other federal regulations with standards for equipment leaks requiring fugitive emissions monitoring
  The Baytown Olefins Plant is currently required and able to complete fugitive emissions monitoring, including periodic rounds for audio, visual and olfactory ("AVO") testing, and repair on some components for which monitoring is required. The Baytown Olefins Plant will continue to be operated in such a manner that all required monitoring and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed monitoring and/or repairs, including repair of components on Delay of Repair. These Delay of Repair components will be repaired or replaced during the next planned shutdown of the respective units.

  If necessary as a result of personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness), alternative monitoring approaches will be evaluated with applicable federal agencies. Alternatives may include Optical Gas Imaging ("OGI") camera monitoring, smaller monitoring crews, etc.; however, these approaches are yet to be determined.

- National Emission Standards for Ethylene Manufacturing Process Units – Heat Exchange Systems (40 CFR 63 Subpart XX); and other federal regulations requiring Heat Exchange System monitoring
  The Baytown Olefins Plant is currently required and able to complete periodic monitoring of heat exchange systems that have one or more heat exchangers in organic hazardous air pollutant ("HAP") service, with the potential for required repairs. The Baytown Olefins Plant will continue to be operated in such a manner that all required monitoring and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed monitoring and/or repairs.

- NESHAP for Boilers and Process Heaters (40 CFR 63 Subpart DDDDD)
  The Baytown Olefins Plant is currently required and able to complete periodic boiler and process heater tune-ups. The Baytown Olefins Plant will continue to be operated in such a manner that all required tune-ups are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed tune-ups.

- Continuous Emissions Monitoring Systems ("CEMS") or Continuous Parameter Monitoring Systems ("CPMS") (40 CFR Part 60 Appendices; and other federal regulations requiring continuous monitoring)
  The Baytown Olefins Plant is currently required and able to operate and maintain numerous CEMS and CPMS to demonstrate compliance with various federal requirements. Maintenance of the CEMS includes, but is not limited to, periodic validations, quarterly cylinder gas audits ("CGAs"), annual relative accuracy test audits ("RATAs"), periodic stack tests of associated equipment and/or maintaining CEMS uptime greater than 95% of total operating time. The Baytown Olefins Plant will continue to be operated in such a manner so as to achieve proper operation and maintenance of each instrumentation system, including the completion of timely repairs to maintain minimal downtime on each system, to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed maintenance and/or repairs on these instrumentation systems. These disruptions may increase downtime on regulatory-required instrumentation systems, which may potentially lead to exceeding 5% of operating time, despite taking all reasonable steps to minimize downtime.

  Additionally, if third party vendors are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to perform specific maintenance requirements, then the Baytown Olefins Plant will evaluate if operating parameters associated with the applicable equipment and/or instrumentation system indicate a degradation in performance. This would entail all reasonable steps to allow the site to continue to operate with a good faith belief that emission standards are being met. If the evaluation indicates emission standards continue to be met, then the site will continue to operate the applicable equipment.

- Federal Monitoring, Testing and Recordkeeping Requirements
  The Baytown Olefins Plant is currently required and able to complete periodic inspections, sampling, monitoring, testing, recordkeeping, etc. per the requirements in 40 CFR Parts 60, 61, 63 and 68. The Baytown Olefins Plant will continue to be operated in such a manner that all required inspections, sampling, monitoring, testing, recordkeeping, etc. are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed inspections, sampling, monitoring, testing, recordkeeping, etc.

- Water Regulations (Water Operating Permits)
  The Baytown Olefins Plant is currently required by Texas Pollutant Discharge Elimination System (TPDES) and multi-sector general permits and is able to conduct regular monitoring of storm water discharge. The Baytown Olefins Plant will continue to be operated in such a

manner that all required sampling of storm water is completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed sampling and/or analysis.

Additionally, if third party laboratories are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to provide timely analysis of collected samples, delays or potentially missed holding times may be experienced that could impact monthly Discharge Monitoring Report ("DMR") data.

- Hazardous Waste Management (40 CFR 260 – 280)
  The Baytown Olefins Plant is currently required and able to manage hazardous waste per the applicable Resource Conservation and Recovery Act ("RCRA") federal requirements that regulate how hazardous waste is managed on-site prior to being accepted at a transportation, disposal, and storage facility ("TSDF"). Hazardous waste is subject to specific treatment at the Baytown Olefins Plant, including temporary storage in on-site containers, sampling, analysis of sample results and subsequent waste classification, scheduling disposal with a third party who meets all requirements, and transportation by qualified personnel. The Baytown Olefins Plant will continue to be operated in such a manner to achieve adequate handling of hazardous waste, including taking all reasonable steps to expedite shipments of wastes to meet current 90-day on-site retention requirements. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may impact the availability of qualified personnel to complete each of these tasks in order to ship hazardous waste to a TSDF within 90 days.

  Additionally, if third party shipping vendors are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to provide the necessary drivers for transportation or if approved disposal facilities are closed, then the Baytown Olefins Plant may be required to retain wastes on-site until the next available opportunity to ship the wastes.

- Chemical Accident Prevention Provisions (40 CFR Part 68)
  The Baytown Olefins Plant is currently required and able to comply with 40 CFR Part 68, commonly referred to as the Risk Management Program. The Baytown Olefins Plant will continue to be operated in such a manner that all applicable requirements are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in potential documentation issues and/or delays, as summarized in the table below:

Citation	Activity
40 CFR 68.73	- Documentation of training compliance may be impacted by the pandemic (either due to precautionary conditions or actual illness) due to inability to access database / intranet remotely - Inspection and testing frequency may be impacted by the pandemic (either due to precautionary conditions or actual illness), resulting in the need for potential extensions - Timeliness of deficiency mitigation may be impacted by the pandemic (either due to precautionary conditions or actual illness) In the event that inspections and/or mitigation steps require extension, appropriate risk assessment protocols will be followed to document the deferral decision.
40 CFR 68.67 (f)	- Unit Process Hazard Analyses ("PHAs") may be impacted by the pandemic (either due to precautionary conditions or actual illness), resulting in potential delays beyond the required 5 year update
40 CFR 68.71(b)	- 3-year refresher training may be impacted by the pandemic (either due to precautionary conditions or actual illness) due to inability to access database / intranet remotely. In the event that 3-year refresher training goes overdue, refresher training would be completed as expeditiously as possible following the return to normal work arrangements/operations.

Should any reporting be required associated with the above items in the event compliance is prevented by Force Majeure, it will be completed as required in the CD and/or in applicable federal regulations, including Title V.

As of the date of this letter, the Baytown Olefins Plant has not noted any regulatory compliance issues with the standards enumerated in the CD or other applicable federal regulations and permits at the Baytown Olefins Plant as a result of the impacts of COVID-19. It is possible that with the spreading and widening impacts of the COVID-19 pandemic that potential noncompliance may be identified, despite ExxonMobil's best efforts and taking all reasonable steps to maintain safe, reliable, and compliant operations. All reasonable efforts will be made by ExxonMobil to ensure compliance with the CD and other applicable federal regulations and permits, and ExxonMobil will make its best efforts to complete the requirements in an expeditious fashion should undesired delays or impediments occur due to the pandemic. Although ExxonMobil does not currently anticipate compliance impacts, ExxonMobil reserves the right to identify additional impacts to which Force Majeure may apply.

If necessary, a follow-up letter will be submitted to provide an update on any impacts from the pandemic experienced by the Baytown Olefins Plant. Additional updates will be provided throughout the duration of the pandemic period, as needed. Should you have any questions or concerns regarding this submittal, please contact Meagan Bowman at (346) 259-2345 or meagan.d.bowman@exxonmobil.com.

Sincerely,

Robert Hill
Baytown Olefins Plant SSHE Manager

cc:

Associate Director
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Branch (6 EN-A)
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1201 Elm Street, Suite 500
Dallas, Texas 75270
CERTIFIED MAIL NO. 7019 1120 0001 9502 3584
RETURN RECEIPT REQUESTED

EES Case Management Unit
Environmental and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044-7611
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Andrew A. Bobb
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Office of Regulatory Enforcement
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Mr. Andrew Wheeler
Environmental Protection Agency Administrator
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Washington, DC 20460
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Mr. Lawrence Starfield
Environmental Protection Agency Principal Deputy Assistant Administrator
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Mr. Ken McQueen
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Mr. Toby Baker
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Electronic copies via e-mail to: *eescdcopy.enrd@usdoj.gov*
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Message

From: Bowman, Meagan D [meagan.d.bowman@exxonmobil.com]
Sent: 4/8/2020 10:33:49 PM
To: eescdcopy.enrd@usdoj.gov; Parrish, Robert [Parrish.Robert@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: ExxonMobil Baytown Chemical Plant - Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19
Attachments: 20200408 EM BTCP EPA CD Force Majeure Notification - COVID19 (No. 4 17-c....pdf

Pursuant to Paragraphs 88-89 of the Consent Decree between the United States, et.al. and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, No. 4:17-cv-3302 (S.D. Tex.), attached please find a Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Baytown Chemical Plant.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

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ExxonMobil

April 8, 2020

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Re: Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Baytown Chemical Plant

Dear Sirs and Madams:

Pursuant to Paragraphs 88-89 of the Consent Decree ("CD") between the United States, et.al. and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, No. 4:17-cv-3302 (S.D. Tex.), entered on June 6, 2018, this letter provides notice that a Force Majeure event (as defined in Paragraph 88 of the CD) ***may potentially occur*** as a result of the global pandemic outbreak of Coronavirus Disease 2019 ("COVID-19"). ***This notification is being provided out of an abundance of caution to preserve all rights under the CD as the COVID-19 pandemic further develops.*** ExxonMobil continues to take diligent and prudent actions to protect the health and safety of its workers, the public and the environment, and to meet market needs as the COVID-19 pandemic develops. However, this potential Force Majeure event may impact the ability of the ExxonMobil Baytown Chemical Plant ("Baytown Chemical Plant") to comply with various provisions of the CD, as well as federal air, water and/or waste regulations.

The CD requires ExxonMobil to include certain CD requirements in the Title V operating permit. Thus, some of the potential compliance issues identified in this Force Majeure notification may also be potential noncompliance with the Title V operating permit. Similarly, many of the CD requirements relate to federal regulations. This letter advises of potential federal air, water and waste regulatory compliance issues under the CD or other permit(s), and/or federal rules and regulations, generally for the Baytown Chemical Plant. To the extent that exemptions do not apply to any such noncompliance or such issues are deemed to be outside the scope of this notification of potential Force Majeure under the CD or other permit(s), and/or federal rules and regulations, ExxonMobil respectfully requests that EPA exercise enforcement discretion to not seek penalties or other enforcement action for potential noncompliance as a result of a reduced workforce from COVID-19 from the period of **April 8, 2020 to June 30, 2020. This initial period may become extended depending on the nature and severity of the COVID-19 impacts over the next few months, and follow-up notifications will be submitted to provide ongoing updates of any actual compliance impacts.** Please note that should potential compliance issues with state regulatory requirements and/or federal regulatory requirements delegated to the state arise due to COVID-19 impacts, the

Baytown Chemical Plant will request enforcement discretion, as appropriate, from the Texas Commission on Environmental Quality (TCEQ).

The CD specifies that a Force Majeure request must comply with the requirements of Paragraph 89 of the CD and must include an explanation and description of the reasons for the delay; the anticipated duration of the delay; all actions taken or to be taken to prevent or minimize the delay; a schedule for implementing any measures to be taken to prevent or mitigate the delay or the effect of the delay; the rationale for attributing such delay to a Force Majeure, and a statement as to whether, in the opinion of ExxonMobil, such an event may cause or contribute to an endangerment of public health, welfare, or the environment. These elements are described below, organized by the respective potentially impacted CD paragraph, along with a discussion of each element. Generally, the cause or causes of the potential delay or prevented performance is the reduction of staffing and available personnel due to COVID-19. Currently the Baytown Chemical Plant is operational, but COVID-19 has led to changes to normal practices, including implementing measures to reduce worker interactions and additional vulnerabilities as a result of COVID-19.

COVID-19 and Its Impact

Explanation and Description of the Potential Delay or Prevented Performance

COVID-19 affects the lungs and airways, with illnesses ranging from mild symptoms to severe illness and death.[1] The virus is highly communicable, remaining viable for hours to days on surfaces made from a variety of materials.[2] The Centers for Disease Control and Prevention ("CDC") itself has stated that "[m]uch is unknown about how the virus that causes COVID-19 spreads."[3] "Close contact" (within about 6 feet) is the most frequent spread from person-to-person.[4] There is no known treatment or vaccine for COVID-19.[5] The CDC states that "[t]he complete clinical picture with regard to COVID-19 is not fully known."[6] The agency stated that "[t]his is the first pandemic known to be caused by the emergence of a new coronavirus," and admitted that "this is a rapidly evolving situation."[7]

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[1] "Symptoms", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html (accessed March 16, 2020).

[2] "Environmental Cleaning and Disinfection Recommendations," Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html (accessed March 16, 2020).

[3] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).

[4] "Environmental Cleaning and Disinfection Recommendations", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html (accessed March 16, 2020).

[5] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[6] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[7] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

As the COVID-19 pandemic has developed and become more dire across the country, government entities and Non-Governmental Organizations ("NGOs") have reacted with progressively more stringent recommendations and restrictions. On January 30, 2020, the International Health Regulations Emergency Committee of the World Health Organization ("WHO") labeled the outbreak a "public health emergency of international concern."[8] On January 31, the U.S. Health and Human Services Department declared a public health emergency for international aid.[9] On March 11, the WHO publicly declared COVID-19 as a pandemic. That same day, the Houston Mayor and County Judge of Harris County signed a proclamation declaring a Local State of Disaster Due to a Public Health Emergency in Houston and Harris County, respectively.[10] On March 13, the President of the United States declared the outbreak a national emergency.[11] That same day, the Governor of the State of Texas issued a proclamation that COVID-19 poses an imminent threat of disaster, declaring a state of disaster for all counties in Texas.[12] On March 24, the County Judge of Harris County issued a Stay Home, Work Safe Order effective as of 11:59 p.m. on March 24.[13] Finally, on March 31, the Governor of the State of Texas issued Executive Order GA 14, directing a state-wide order effective at 12:01 a.m. on April 2 through April 30, 2020 to "minimize social gatherings and minimize in-person contact with" non-household members except where necessary to provide or obtain essential services.[14]

As the Occupational Safety and Health Administration ("OSHA") acknowledges, COVID-19 renders wide impacts on absenteeism based on illness, caregiving for sick or the at-risk, and caregiving for school closures.[15] Interrupted supply lines may also cause severe impacts.[16] OSHA specifically recommended flexible telecommuting where possible.[17] OSHA also encouraged minimizing contact among workers, and establishing a reduction in the total number of employees in a facility at a given

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[8] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[9] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[10] "Mayor Sylvester Turner and Harris County Judge Lina Hidalgo Declare Public Health Emergency Due to COVID-19", Mayor's Office Press Release, http://houstontx.gov/mayor/press/2020/public-health-emergency-declared-covid-19.html (accessed March 23, 2020).

[11] "Situation Summary", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/summary.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fsummary.html (accessed March 16, 2020).

[12] "Governor Abbott Declares State of Disaster in Texas Due to COVID-19", Office of the Texas Governor, https://gov.texas.gov/news/post/governor-abbott-declares-state-of-disaster-in-texas-due-to-covid-19 (accessed March 16, 2020).

[13] "Stay Home, Work Safe", Order of County Judge Lina Hidalgo, https://www.houston.org/news/harris-county-issues-mandatory-stay-home-work-safe-order (accessed March 26, 2020).

[14] "Executive Order GA 14", https://gov.texas.gov/uploads/files/press/EO-GA 14_Statewide_Essential_Service_and_Activity_COVID-19_IMAGE_03-31-2020.pdf (accessed April 2, 2020).

[15] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

[16] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

[17] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).

time, "allowing them to maintain distance from one another..."[18] Eventually, the CDC recommended that in-person community events of fifty (50) people or more be postponed or cancelled, with a subsequent recommendation by the White House that in-person events of ten (10) people or more be cancelled or postponed between March 16-30[19], currently extended through April 30.

The CDC states that "[a]ll employers need to consider how best to decrease the spread of acute respiratory illness and lower the impact of COVID-19 in their workplace..."[20] The Baytown Chemical Plant has taken and continues to take cautious and reasonable steps to prepare for any COVID-19 impact. The Baytown Chemical Plant followed the cleaning and disinfection recommendations of the CDC for weeks prior to any confirmed case in Baytown or Harris County.[21] The Baytown Chemical Plant also followed established recommendations to avoid the spread of the illness.[22]

The Baytown Chemical Plant has carefully established essential personnel plans. On March 13, the Baytown Chemical Plant transitioned to the "Hot Standby Phase" of its plan, taking steps to facilitate further social distancing and leveraging alternative work locations by shifting operations to "essential personnel" only.

However, as the CDC acknowledges, those plans must be "flexible" given the uncertainties related to the disease and possible community impacts.[23] When planning, the CDC recommended considering factors including:

- The overall number of attendees (*Baytown Chemical Plant employs a workforce of approximately 1,000 employees and also utilizes independent contractors)*;
- The number of people attending who are at greater risk of more serious illness after contracting COVID-19 *(Baytown Chemical Plant employs vulnerable employees)*;
- The density of attendees within a confined area *(Baytown Chemical Plant normal operations require work within confined areas)*;
- The potential economic impact to participants, attendees, staff, and the larger community;
- The level of transmission in your local community, and the level of transmission in the areas from which your attendees will travel (*ExxonMobil is a global company)*; and
- If there are ways in which to significantly reduce the number of attendees.[24]

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[18] "Guidance on Preparing Workplaces for COVID-19", Occupational Safety Health Administration, https://www.osha.gov/Publications/OSHA3990.pdf (March 16, 2020).
[19] "Get Your Mass Gatherings or Large Community Events Ready", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/large-events/mass-gatherings-ready-for-covid-19.html (accessed March 16, 2020).
[20] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).
[21] "Environmental Cleaning and Disinfection Recommendations", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html (accessed March 16, 2020).
[22] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).
[23] "Interim Guidance for Business and Employers", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html (accessed March 16, 2020).
[24] Get Your Mass Gatherings or Large Community Events Ready", Centers for Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/large-events/mass-gatherings-ready-for-covid-19.html (accessed March 16, 2020).

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The Baytown Chemical Plant has carefully considered ways in which to significantly reduce the number of on-site personnel while still meeting regulatory obligations. The actions taken by the Baytown Chemical Plant to date have been reasonable and prudent while balancing regulatory obligations and maintaining the health and safety of its workers and the public.

Measures taken at the Baytown Chemical Plant include reducing the number of non-essential employees working on-site to limit exposure of essential personnel to outside persons, proactively reinforcing social distancing and implementing the use of virtual meetings. Personnel were also asked to self-monitor for symptoms; and to self-quarantine if the employee or contractor experienced symptoms of COVID-19, has come in contact with a person with COVID-19, or recently travelled to an area with sustained COVID-19 transmission. In addition, ExxonMobil offered assistance to qualifying employees with childcare needs during school closures to enable on-site presence of essential personnel to maintain safe operations at the Baytown Chemical Plant.

Unfortunately, future developments may impair the ability to fulfill all requirements. Due to what federal and state agencies acknowledge to be a rapidly evolving and unknown progression of the disease in the public, the Baytown Chemical Plant respectfully provides notice that the enclosed may be potential impacts arising from the disease beyond the control of ExxonMobil, despite the exercise of due diligence and making its best efforts to avoid or minimize delays or impediments to performance.

Anticipated Duration of the Potential Delays, and Schedule for Mitigating the Potential Delay or Prevented Performance

ExxonMobil anticipates that the Baytown Chemical Plant will be able to resume normal staffing at the site and return to normal work arrangements/operations **beginning no later than June 30, 2020**. However, due to the uncertainty associated with the rapidly evolving developments of COVID-19, the actual length of time where potential delays or impediments are experienced may be different than originally anticipated. While following recommendations from the CDC and OSHA, and monitoring the community and greater effects of COVID-19, ExxonMobil will make all diligent efforts to protect the health of its employees to maintain safe operation, and to return to normal operations as soon as practical. Updates to the exact timing of resuming normal work arrangements/operations will be included in a follow-up to this letter.

Potential Impacted Issues

As a result of the above-described situation, ExxonMobil believes the expected impact of COVID-19 on the Baytown Chemical Plant qualifies as a potential Force Majeure event pursuant to Paragraphs 88 and 89 of the CD. In addition, to the extent that the effects of this pandemic impact the ability of the Baytown Chemical Plant to comply with federal air, water and/or waste regulations, ExxonMobil requests enforcement discretion during this event for the following enumerated areas for the period from **April 8, 2020 through June 30, 2020**. This time period represents the commencement of potential impacts from COVID-19 to our current best estimate of a return to normal work arrangements/operations.

The following list identifies an initial set of potential compliance issues at the Baytown Chemical Plant that may occur in the initial phases of COVID-19 response. ***It is important to note that these are primarily administrative delays or adjustments to activities which are expected to have minimal to no emissions or environmental impact.*** ExxonMobil's requests and contingency responses are consistent with the March 26, 2020 guidance memo provided by the EPA ("COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program"), and are reasonable and environmentally protective in light of the pandemic impacts acknowledged by EPA's guidance memo.[25] Site emission control and treatment devices and systems remain operational at this time consistent with CD and other federal regulatory obligations:

1. Instrumentation and Monitoring Systems: Specifications, Calibration, Quality Control, and Maintenance [CD Paragraph 25(a)(i)]

   The Baytown Chemical Plant is currently required and able to comply with applicable quality assurance and quality control activities in order to maintain proper operation of CD instruments and analyzers, including required daily, quarterly, and annual QA/QC requirements. The Baytown Chemical Plant will continue to be operated in such a manner so as to maintain proper operation of CD instruments and analyzers to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed daily, quarterly, and/or annual QA/QC requirements.

2. Standard During Instrument Downtime [CD Paragraph 45]

   The Baytown Chemical Plant is currently required to maintain less than 5% downtime for specific instrumentation associated with the Covered Flares. As of the date of this letter, all Covered Flare instrumentation downtime remains less than 5% of total operating time. The Baytown Chemical Plant will continue to be operated in such a manner so as to achieve proper operation and maintenance of each Covered Flare instrumentation system, including the completion of timely repairs to maintain minimal downtime on each system, to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed maintenance and/or repairs on the Covered Flare instrumentation systems. These disruptions may increase downtime on Covered Flare instrumentation systems, which may potentially lead to exceeding 5% of operating time, despite making best efforts to minimize downtime. Should Covered Flare instrumentation downtime occur, the Baytown Chemical Plant will use other instrumentation and systems, as available, to operate Covered Flares to meet the required combustion efficiency standards.

[25] "COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program", Environmental Protection Agency, https://www.epa.gov/coronavirus (accessed March 26, 2020).

3. Fenceline Monitoring Requirements [CD Paragraph 48]

   The Baytown Complex (including the Baytown Chemical Plant) is currently required and able to maintain and to collect samples from 50 passive benzene monitors located around the fenceline of the Baytown Complex. The Baytown Chemical Plant will continue to be operated in such a manner that sample stations are maintained, samples are collected and analyzed in a timely manner and posted to the public website within the required 14-day period to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed sample collection, analysis and/or associated reporting.

   Additionally, if third party shipping vendors and/or laboratories are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to transport collected samples or provide timely analysis of collected samples, respectively, delays or potentially missed holding times may be experienced that could impact bi-weekly sample analysis.

4. Reporting Requirements – First Updated Waste Gas Minimization Plan [CD Paragraph 30] and Semi-Annual Reports [CD Paragraph 66]; and other federal regulations requiring submittal of periodic reports

   The Baytown Chemical Plant is currently required and able to submit numerous periodic reports as required by applicable federal regulations; including the First Updated Waste Gas Minimization Plan ("WGMP") due on June 5, 2020 and the CD Semi-Annual Report, due every six months. The Baytown Chemical Plant will continue to be operated in such a manner that all required reports are accurately completed and submitted timely to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in delayed report submittals as significant effort and coordination across the site is required to complete the reports accurately and in a timely manner.

5. Supplemental Environmental Project [CD Paragraph 49 and CD Appendix 2.1]

   The Baytown Chemical Plant is currently required to complete a tree planting project as part of a Supplemental Environmental Project ("SEP"). The Baytown Chemical Plant will continue to meet the applicable requirements of the SEP to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in delayed SEP completion.

6. Compliance with Title V Permit Conditions and Other Federal Regulatory Requirements

   - Storage Vessels (40 CFR 60 Subparts K, Ka, and Kb; 40 CFR Parts 61 and 63)
     The Baytown Chemical Plant is currently required and able to complete periodic inspections of storage vessels, with the potential for required repairs. The Baytown Chemical Plant will continue to be operated in such a manner that all required inspections and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed inspections and/or repairs.

- Leak Detection and Repair (40 CFR 60 Subpart VV); and other federal regulations with standards for equipment leaks requiring fugitive emissions monitoring
  The Baytown Chemical Plant is currently required and able to complete fugitive emissions monitoring, including periodic rounds for audio, visual and olfactory ("AVO") testing, and repair on some components for which monitoring is required. The Baytown Chemical Plant will continue to be operated in such a manner that all required monitoring and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed monitoring and/or repairs, including repair of components on Delay of Repair. These Delay of Repair components will be repaired or replaced during the next planned shutdown of the respective units.

  If necessary as a result of personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness), alternative monitoring approaches will be evaluated with applicable federal agencies. Alternatives may include Optical Gas Imaging ("OGI") camera monitoring, smaller monitoring crews, etc.; however, these approaches are yet to be determined.

- NESHAP for Benzene Waste Operations (40 CFR 61 Subpart FF); and other federal regulations requiring periodic monitoring of wastewater systems
  The Baytown Chemical Plant is currently required and able to complete inspection, monitoring, and repair of applicable equipment per the requirements in 40 CFR Part 61, Subpart FF, including monitoring and replacement of carbon canisters. In addition, the Baytown Chemical Plant is currently required and able to complete inspection, monitoring, and repair of applicable wastewater equipment per the requirements in other federal regulations (e.g., 40 CFR 63 Subpart G). The Baytown Chemical Plant will continue to be operated in such a manner that all required inspections, monitoring and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed inspections, monitoring and/or repairs.

  The Baytown Chemical Plant will pay particular attention to carbon absorption and treatment devices to ensure proper operations to meet emission and concentration limitations to the maximum extent practical. In most instances, missed or delayed inspections and/or monitoring would not indicate loss of control/treatment capability, but rather foregoing a routine verification step. Operational parameters and conditions provide adequate ability to achieve compliance with applicable standards in the absence of periodic inspections and/or monitoring.

- NESHAP from the Synthetic Organic Chemical Manufacturing Industry – Heat Exchange Systems (40 CFR 63 Subpart F); and other federal regulations requiring Heat Exchange System monitoring
  The Baytown Chemical Plant is currently required and able to complete periodic monitoring of heat exchange systems that have one or more heat exchangers in organic hazardous air pollutant ("HAP") service, with the potential for required repairs. The Baytown Chemical Plant

will continue to be operated in such a manner that all required monitoring and repairs are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed monitoring and/or repairs.

- NESHAP for Boilers and Process Heaters (40 CFR 63 Subpart DDDDD)
  The Baytown Chemical Plant is currently required and able to complete periodic boiler and process heater tune-ups. The Baytown Chemical Plant will continue to be operated in such a manner that all required tune-ups are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed tune-ups.

- Continuous Emissions Monitoring Systems ("CEMS") or Continuous Parameter Monitoring Systems ("CPMS") (40 CFR Part 60 Appendices; and other federal regulations requiring continuous monitoring)
  The Baytown Chemical Plant is currently required and able to operate and maintain numerous CEMS and CPMS to demonstrate compliance with various federal requirements. Maintenance of the CEMS includes, but is not limited to, periodic validations, quarterly cylinder gas audits ("CGAs"), annual relative accuracy test audits ("RATAs"), periodic stack tests of associated equipment and/or maintaining CEMS uptime greater than 95% of total operating time. The Baytown Chemical Plant will continue to be operated in such a manner so as to achieve proper operation and maintenance of each instrumentation system, including the completion of timely repairs to maintain minimal downtime on each system, to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed maintenance and/or repairs on these instrumentation systems. These disruptions may increase downtime on regulatory-required instrumentation systems, which may potentially lead to exceeding 5% of operating time, despite taking all reasonable steps to minimize downtime.

  Additionally, if third party vendors are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to perform specific maintenance requirements, then the Baytown Chemical Plant will evaluate if operating parameters associated with the applicable equipment and/or instrumentation system indicate a degradation in performance. This would entail all reasonable steps to allow the site to continue to operate with a good faith belief that emission standards are being met. If the evaluation indicates emission standards continue to be met, then the site will continue to operate the applicable equipment.

- Federal Monitoring, Testing and Recordkeeping Requirements
  The Baytown Chemical Plant is currently required and able to complete periodic inspections, sampling, monitoring, testing, recordkeeping, etc. per the requirements in 40 CFR Parts 60, 61, 63 and 68. The Baytown Chemical Plant will continue to be operated in such a manner that all required inspections, sampling, monitoring, testing, recordkeeping, etc. are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed inspections, sampling, monitoring, testing, recordkeeping, etc.

- Water Regulations (Water Operating Permits)
  The Baytown Chemical Plant is currently required by Texas Pollutant Discharge Elimination System (TPDES) and multi-sector general permits and is able to conduct regular monitoring of storm water discharge. The Baytown Chemical Plant will continue to be operated in such a manner that all required sampling of storm water is completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in missed or delayed sampling and/or analysis.

  Additionally, if third party laboratories are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to provide timely analysis of collected samples, delays or potentially missed holding times may be experienced that could impact monthly Discharge Monitoring Report ("DMR") data.

- Hazardous Waste Management (40 CFR 260 – 280)
  The Baytown Chemical Plant is currently required and able to manage hazardous waste per the applicable Resource Conservation and Recovery Act ("RCRA") federal requirements that regulate how hazardous waste is managed on-site prior to being accepted at a transportation, disposal, and storage facility ("TSDF"). Hazardous waste is subject to specific treatment at the Baytown Chemical Plant, including temporary storage in on-site containers, sampling, analysis of sample results and subsequent waste classification, scheduling disposal with a third party who meets all requirements, and transportation by qualified personnel. The Baytown Chemical Plant will continue to be operated in such a manner to achieve adequate handling of hazardous waste, including taking all reasonable steps to expedite shipments of wastes to meet current 90-day on-site retention requirements. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may impact the availability of qualified personnel to complete each of these tasks in order to ship hazardous waste to a TSDF within 90 days.

  Additionally, if third party shipping vendors are impacted by the pandemic (either due to precautionary conditions or actual illness) and are unable to provide the necessary drivers for transportation or if approved disposal facilities are closed, then the Baytown Chemical Plant may be required to retain wastes on-site until the next available opportunity to ship the wastes.

- Chemical Accident Prevention Provisions (40 CFR Part 68)
  The Baytown Chemical Plant is currently required and able to comply with 40 CFR Part 68, commonly referred to as the Risk Management Program. The Baytown Chemical Plant will continue to be operated in such a manner that all applicable requirements are completed to the best of its ability. However, personnel restrictive measures and/or other impacts from the pandemic (either due to precautionary conditions or actual illness) may result in potential documentation issues and/or delays, as summarized in the table below:

Citation	Activity
40 CFR 68.73	- Documentation of training compliance may be impacted by the pandemic (either due to precautionary conditions or actual illness) due to inability to access database / intranet remotely - Inspection and testing frequency may be impacted by the pandemic (either due to precautionary conditions or actual illness), resulting in the need for potential extensions - Timeliness of deficiency mitigation may be impacted by the pandemic (either due to precautionary conditions or actual illness) In the event that inspections and/or mitigation steps require extension, appropriate risk assessment protocols will be followed to document the deferral decision.
40 CFR 68.67 (f)	- Unit Process Hazard Analyses ("PHAs") may be impacted by the pandemic (either due to precautionary conditions or actual illness), resulting in potential delays beyond the required 5 year update
40 CFR 68.71(b)	- 3-year refresher training may be impacted by the pandemic (either due to precautionary conditions or actual illness) due to inability to access database / intranet remotely. In the event that 3-year refresher training goes overdue, refresher training would be completed as expeditiously as possible following the return to normal work arrangements/operations.

Should any reporting be required associated with the above items in the event compliance is prevented by Force Majeure, it will be completed as required in the CD and/or in applicable federal regulations, including Title V.

As of the date of this letter, the Baytown Chemical Plant has not noted any regulatory compliance issues with the standards enumerated in the CD or other applicable federal regulations and permits at the Baytown Chemical Plant as a result of the impacts of COVID-19. It is possible that with the spreading and widening impacts of the COVID-19 pandemic that potential noncompliance may be identified, despite ExxonMobil's best efforts and taking all reasonable steps to maintain safe, reliable, and compliant operations. All reasonable efforts will be made by ExxonMobil to ensure compliance with the CD and other applicable federal regulations and permits, and ExxonMobil will make its best efforts to complete the requirements in an expeditious fashion should undesired delays or impediments occur due to the pandemic. Although ExxonMobil does not currently anticipate compliance impacts, ExxonMobil reserves the right to identify additional impacts to which Force Majeure may apply.

If necessary, a follow-up letter will be submitted to provide an update on any impacts from the pandemic experienced by the Baytown Chemical Plant. Additional updates will be provided throughout the duration of the pandemic period, as needed. Should you have any questions or concerns regarding this submittal, please contact Meagan Bowman at (346) 259-2345 or meagan.d.bowman@exxonmobil.com.

Sincerely,

Jeffrey K. Kovacs, P.E.
Baytown Complex SSHE Manager

cc:

Associate Director
Air, Toxics, and Inspections Coordination
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Washington, D.C. 20044-7611
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Ms. Nicole Bealle
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Electronic copies via e-mail to: *eescdcopy.enrd@usdoj.gov*
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Message

From: Davis, Kelly E [kelly.e.davis@exxonmobil.com]
Sent: 2/27/2020 4:05:51 PM
To: Parrish, Robert [Parrish.Robert@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: Consent Decree, Civil Action No. 4:17-cv-3302
Attachments: ExxonMobil Baytown Chemical Plant Consent Decree SAR 2H19.pdf; ExxonMobil Baytown Olefins Plant Consent Decree SAR 2H19.pdf

Please see attached submittals.

Kelly E. Davis
Flare CD Coordinator

ExxonMobil Chemical Company
Baytown, TX
Office: 346.259.6014
Cell: 832.262.3887

Exxon Mobil Corporation
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ExxonMobil

February 20, 2020

Director, Air Enforcement Division
Office of Civil Enforcement
U.S. Environmental Protection Agency
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William Jefferson Clinton Building
Room 1119
Washington, D.C. 20460-0001

Associate Director
Air, Toxics, and Inspections Coordination Branch (6 EN-A)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, TX 75270

RE: Consent Decree, United States vs. Exxon Mobil Corp., Civil Action No. 4:17-cv-3302 (S.D. Tex.), Semi-Annual Reporting Requirements - ExxonMobil Baytown Chemical Plant

To Whom It May Concern:

Pursuant to Section X, Paragraphs 66-73 of Consent Decree, Civil Action No. 4:17-cv-3302, Exxon Mobil Corporation (ExxonMobil) submits this Semi-Annual Report (SAR) covering the period of July 1, 2019 through December 31, 2019.

Certification Statement
Per Consent Decree Paragraph 71:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions about this SAR or require any additional information, please contact Kelly Davis at 346-259-6014 or kelly.e.davis@exxonmobil.com.

Sincerely,

Mary Katherine Lightfoot

Mary Katherine Lightfoot
Baytown Chemical Plant Manager
ExxonMobil Baytown Chemical Plant

Attachment

cc: EES Case Management Unit
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044-7611
Re: DJ # 90-5-2-1-10128 and 10128/1

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Baytown Chemical Plant

Baytown, Texas

SEMI-ANNUAL REPORT
PURSUANT TO CONSENT DECREE,
UNITED STATES, ET AL V. EXXON MOBIL CORPORATION AND EXXONMOBIL OIL CORPORATION,
CIVIL ACTION NO. 4:17-cv-3302 (S.D. Tex.)

July 1, 2019 – December 31, 2019

5000 Bayway Drive

Baytown, Texas

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SECTION 1 STATUS OF CONSENT DECREE SECTION V COMPLIANCE REQUIREMENTS

This progress report provides the status of implementation of Consent Decree requirements that, during the reporting period, require the ExxonMobil Baytown Chemical Plant to undertake a specific action or make a submittal to an agency; or otherwise require the ExxonMobil Baytown Chemical Plant to take specific steps to implement new obligations, including new control or emissions requirements, new monitoring requirements, or institution of new procedures. Once the ExxonMobil Baytown Chemical Plant has reported a requirement as implemented, it will not appear in subsequent progress reports under this subparagraph.

Consent Decree Paragraph 66.a. – b.

a. A description of the status of work performed and progress made toward implementing all requirements of Consent Decree Section V Compliance Requirements at the Covered Facilities. This topic should describe any major milestones completed and remaining to be completed;

Status: ExxonMobil Baytown Chemical Plant completed all remaining work as required to meet the requirements of Consent Decree Section V Compliance Requirements in the prior reporting period. There were no major milestones completed for this reporting period, as noted by "None" in Table 1.1.

TABLE 1.1 Major Milestones Completed For This Reporting Period

Applicability	Description of Work Completed During This Reporting Period	Completion Date
None	None	None

Status: There is no remaining work to be completed by the ExxonMobil Baytown Chemical Plant to meet the requirements of Consent Decree Section V Compliance Requirements, as noted by "None" in Table 1.2.

TABLE 1.2 Status of Remaining Work to be Completed

Applicability	Remaining Work to be Completed	Anticipated Completion Date
None	None	None

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b. A description of any problems encountered or anticipated in meeting the requirements in Consent Decree Section V Compliance Requirements at the Covered Facilities, together with implemented or proposed solutions;

Status: ExxonMobil Baytown Chemical Plant has not encountered problems and does not anticipate problems in meeting the requirements of Consent Decree Section V Compliance Requirements, as noted by "None" in Table 1.3.

TABLE 1.3 Encountered or Anticipated Problems in Work to be Completed

Covered Flare	Encountered or Anticipated Problem(s)	Proposed or Implemented Solution(s)
None	None	None

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SECTION 2 STATUS OF CONSENT DECREE SECTION V REPORTING REQUIREMENTS

Below is a summary of the status of reports as required under Consent Decree Section V.

Flare Data and Monitoring Systems and Protocol Report
Requirement: Consent Decree Paragraph 18
Description: For each Covered Flare, by no later than 365 Days after the Effective Date, the Defendants must submit a report, consistent with the requirements in Appendix 1.5, to EPA that includes the following:

a. The information, diagrams, and drawings specified in Paragraphs 1–7 of Appendix 1.5;
b. A detailed description of each instrument and piece of monitoring equipment, including the specific model and manufacturer, that the Defendants have installed or will install in compliance with Paragraphs 20–24 of this Consent Decree (Paragraphs 8–9 of Appendix 1.5); and
c. A narrative description of the monitoring methods and calculations that the Defendants will use to comply with the requirements of Paragraph 43 (Paragraph 10 of Appendix 1.5).

Status: The Flare Data and Monitoring Systems and Protocol Report was submitted by the ExxonMobil Baytown Chemical Plant on June 6, 2019.

Initial Waste Gas Minimization Plan ("Initial WGMP")
Requirement: Consent Decree Paragraph 29
Description: By no later than 365 Days after the Effective Date, for each Covered Flare, the Defendants must submit to EPA an Initial Waste Gas Minimization Plan that discusses and evaluates flaring Prevention Measures on both a facility-wide and Covered Flare-specific basis for each Covered Facility.

Status: The Initial Waste Gas Minimization Plan was submitted by the ExxonMobil Baytown Chemical Plant on June 6, 2019.

First Updated Waste Gas Minimization Plan ("First Updated WGMP")
Requirement: Consent Decree Paragraph 30
Description: By no later than 730 Days after the Effective Date, the Defendants must submit to EPA a First Updated WGMP that updates, if and as necessary, the information, diagrams, and drawings required in the Flare Data and Monitoring Systems and Protocol Report required by Paragraph 18 and the information required in sub-Paragraphs 29.a–29.e for the 12-month period after the period covered by the Initial Waste Gas Minimization Plan.

Status: This section does not apply to this semi-annual reporting period. The first Updated Waste Gas Minimization Plan submittal is due no later than June 5, 2020.

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Consent Decree Paragraph 66.c.

c. A description of the status of any permit applications, including a summary of all permitting activity, pertaining to compliance with this Consent Decree;

Status: ExxonMobil Baytown Chemical Plant submitted permit applications to TCEQ's Air Permits Division for Permit Number 20211/PAL16 and Permit Number 4600 on May 17, 2019. The altered permits were issued September 16, 2019, and incorporated the requirements listed in the Consent Decree Paragraph 60.c such that the requirements (i) become and remain "applicable requirements" as that term is defined in 40 C.F.R. §70.2 and (ii) survive the termination of the Consent Decree.

ExxonMobil Baytown Chemical Plant submitted a permit application to TCEQ's Air Permits Division for Title V Permit O2269 on January 2, 2020 to incorporate the requirements listed in the Consent Decree Paragraph 60.c into Title V Permit O2269 through incorporation of Permit Number 20211/PAL16 and Permit Number 4600 issued September 16, 2019. In accordance with Consent Decree Paragraph 60.b., the permit application was submitted no later than three years after the Effective Date or one year after the respective deadline for the Compliance Requirements listed in Paragraph 60.c.

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Consent Decree Paragraph 66.d.

d. A copy of any reports that were submitted only to LDEQ and that pertain to compliance with this Consent Decree.

Status: This section does not apply because the ExxonMobil Baytown Chemical Plant is located in the State of Texas and therefore does not submit reports to LDEQ.

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Consent Decree Paragraph 66.e.

e. A description of the Defendants' progress in satisfying its obligations in connection with the SEP(s) under Section VI including, at a minimum, a narrative description of activities undertaken; status of any construction or compliance measures, including the completion of any milestones set forth in the SEP Work Plan (attached as Appendix 2.1), and a summary of costs incurred since the previous report;

The Louisiana Beneficial Environmental Projects (BEPs) have been completed. Refer to the Semi-Annual Report submitted by the ExxonMobil Baton Rouge Chemical Plant for supporting information and documentation.

Status: Under the Baytown Area Phyto-Pollution Reduction Supplemental Environmental Project (SEP), ExxonMobil will provide $1,000,000 in funding to the City of Baytown Parks and Recreation Department ("Baytown PARD") for planting approximately 1,458 trees. As of December 31, 2019, ExxonMobil has provided $600,000 in funding to the City of Baytown for the implementation of the SEP. Pursuant to the Fourth Stipulation Making Minor Modification to the Consent Decree filed on October 8, 2019, ExxonMobil requested a revised Project Schedule and agreed to plant 100 additional trees adjacent to public road(s) on property owned by ExxonMobil near the Baytown Facilities. The revised Project Schedule for the Baytown, Texas SEP is as follows:

Phases 1 and 2: Approximately 584 trees shall be planted by no later than March 31, 2020.
Phases 3 and 4: Approximately 583 trees shall be planted by no later than August 31, 2020.
Phase 5: Approximately 391 trees shall be planted by no later than December 31, 2020.

The Baytown PARD is planning to adjust the size of the trees in order to be able to purchase the required number of trees within the Consent Decree funding. Per Appendix 2.1, the Baytown PARD director may approve alternate tree sizes. The Baytown PARD will order some 100 gallon trees, but less than the 34% as described in the Consent Decree. Similarly, the Baytown PARD has determined it will be unable to plant approximately 50% of the trees within one mile of ExxonMobil's Baytown Facilities because there simply are not enough parks located within one mile of ExxonMobil's Baytown Facilities and the City of Baytown does not have the authority to plant in the right of ways which it does not own. Currently, the City of Baytown is expecting approximately 40% of the trees will be planted within one mile of ExxonMobil's Baytown Facilities.

The lump sum bid that was awarded was for $516,151.67, and included the cost for dirt, irrigation, planting material, staking and guying materials, and warranties. The project began construction on November 1, 2019. Plantings and irrigation were installed at Evergreen Park, Britton Park, Goose Creek Trail, and Unidad Parks. As of December 31, 2019, 592 trees have been planted, completing Phases 1 and 2. The tree species included

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drummond red maple, bald cypress, sweetbay magnolia, cedar elm, basham crape myrtle, river birch, and pecan.

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Consent Decree Paragraph 66.f.

f. Any updated WGMP for the Covered Facilities that is required to be submitted by Paragraph 31.

Subsequent Updates to WGMPs ("Subsequently Updated WGMP")
Requirement: Consent Decree Paragraph 31
On an annual basis after submitting the First Updated WGMP until termination of the Decree, the Defendants must submit an updated WGMP for a Covered Facility as part of the Semi-Annual Report required by Section IX (Reporting Requirements) if, at that Covered Facility, the Defendants: a) commence operation of a Newly Installed Covered Flare or permanently remove a Covered Flare from service, b) connect a new Waste Gas stream to a Covered Flare, c) intentionally modify the Baseload Waste Gas Flow Rate to a Covered Flare, d) install additional FGRS, or e) change the design of a Covered Flare. Each update must update, if and as necessary, the information required in sub-Paragraphs 29.a.i - 29.a.iii. Each update must update, if and as necessary, the information required in sub-Paragraphs 30.a and 30.b. To the extent the Defendants propose to extend any schedule set forth in a previous WGMP for any of the Covered Facilities, the Defendants may do so only with good cause, the determination of which is subject to Section XII (Dispute Resolution).

Status: The Initial Waste Gas Minimization Plan was submitted by the ExxonMobil Baytown Chemical Plant on June 6, 2019. The first Updated Waste Gas Minimization Plan submittal is due no later than June 5, 2020. Subsequent updates, if necessary, will be made on an annual basis as part of the Semi-Annual Report.

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SECTION 7 SUMMARY OF INTERNAL FLARING INCIDENT REPORTS

Consent Decree Paragraph 66.g.

g. Any summary of internal flaring incident reports as required by Paragraph 34.

Submitting Summary of Internal Flaring Incident Reports
Requirement: CD Paragraph 34.b.
In each Semi-Annual Report due under Section IX (Reporting Requirements), the Defendants must include a summary of the following items for each Reportable Flaring Incident that occurred during the six-month period that the Semi-Annual Report covers:

i. Date;
ii. Duration;
iii. Amount of VOCs and HAPs emitted;
iv. Root cause(s);
v. Corrective action(s) completed;
vi. Corrective action(s) still outstanding; and
vii. An analysis of any trends identified by the Defendants in the number of Reportable Flaring Incidents, the root causes, or the types of corrective action(s).

Status: In accordance with Paragraph 34.a. of the Consent Decree, ExxonMobil Baytown Chemical Plant began monitoring for Reportable Flaring Incidents (RFIs) on June 6, 2019. A summary of RFIs that occurred from July 1, 2019 through December 31, 2019 are provided in Table 7.1.

TABLE 7.1 July 1, 2019 – December 31, 2019
Summary of Internal Flaring Incident Reports

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Date	Duration (hours)	Amount Emitted	
		VOCs (pounds)	HAPs (pounds)
8/20/2019 19:18 – 8/21/2019 04:45	9.4	1,333	0
Covered Flare(s)	FS-9		
Root Cause(s)	The feed to the NRU Pre Frac depentanizer tower (Column 2B) was lighter than typical, resulting in increased tower venting to the flare system in order to control the pressure of the tower.		
Corrective Action(s) Completed	Updated the Operations Flare Summary daily monitoring tool to more accurately account for the C5+ concentration of the Waste Gas to facilitate prompt identification of changes in feed concentration.		
Corrective Action(s) Still Outstanding	None		

Date	Duration (hours)	Amount Emitted	
		VOCs (pounds)	HAPs (pounds)
9/22/2019 13:49 – 9/25/2019 12:49	71.0	5,372	0
Covered Flare(s)	FS-9, FS-23		
Root Cause(s)	Due to elevated hydrocarbon content in the transfer system that was caused by venting of hydrocarbons from polymer granule bins, Baytown Polypropylene unit (BAPP) Line 8 and Line 4 were shutdown.		
Corrective Action(s) Completed	1. Updated console Triconex Alarm Response 8DA-101 to include reducing the granules bin levels to minimum. 2. Updated the Product Directive with the increased level on steaming drum. 3. Updated technical LEL troubleshooting guide to include information on reducing granules level to minimum.		
Corrective Action(s) Still Outstanding	None		

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Date	Duration (hours)	Amount Emitted	
		VOCs (pounds)	HAPs (pounds)
11/12/2019 06:02 – 11/14/2019 00:20 11/17/2019 07:50 – 11/18/2019 15:02	73.5	2,780	0
Covered Flare(s)	FS-9, FS-23, FS-24		
Root Cause(s)	PCP211B, a polymer grade propylene control valve at the Propylene Concentration Unit (PCU) was bypassed and the bypass valve began to leak and was isolated. This decreased the pressure of this feed line to BAPP, causing both Line 4 and Line 8 to shut down.		
Corrective Action(s) Completed	1. Replaced PCP211B control valve. 2. Replaced bypass valve to PCP211B.		
Corrective Action(s) Still Outstanding	None		

Paragraph 34.b.vii. of the Consent Decree requires an analysis of any trends identified in the number of Reportable Flaring Incidents, the root causes, or the types of corrective actions(s).

Status: ExxonMobil Baytown Chemical Plant did not identify trends in the number of RFIs, the root causes, or the types of corrective action(s).

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Consent Decree Paragraph 66.h.

h. A summary of the following, per Covered Flare per Calendar Quarter (hours shall be rounded to the nearest tenth):

(1) The total number of hours of Instrument Downtime claimed pursuant to Paragraph 45, expressed as both an absolute number and a percentage of time the Covered Flare that the instrument/equipment monitors is In Operation and Capable of Receiving Sweep, Supplemental, and/or Waste Gas;

TABLE 8.1 3rd Quarter 2019 Instrument Downtime Summary

Covered Flare	Monitoring System	System Downtime (%)	System Downtime (hours)
FS-9	Vent Gas Flow	0.0	0.0
FS-9	Steam Flow	0.0	0.3
FS-9	Net Heating Value	0.1	1.5
FS-9	Camera	0.0	0.2
FS-12	Vent Gas Flow	0.0	0.0
FS-12	Steam Flow	0.0	0.0
FS-12	Net Heating Value	3.0	67.3
FS-12	Camera	0.0	0.1
FS-23	Vent Gas Flow	0.0	0.5
FS-23	Steam Flow	0.0	0.0
FS-23	Net Heating Value	0.0	0.5
FS-23	Camera	0.0	0.0
FS-24	Vent Gas Flow	0.0	0.0
FS-24	Steam Flow	0.0	0.0
FS-24	Net Heating Value	1.4	31.8
FS-24	Camera	0.0	0.0

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TABLE 8.2 4th Quarter 2019 Instrument Downtime Summary

Covered Flare	Monitoring System	System Downtime (%)	System Downtime (hours)
FS-9	Vent Gas Flow	0.0	0.0
FS-9	Steam Flow	0.0	0.5
FS-9	Net Heating Value	0.0	0.5
FS-9	Camera	0.0	0.0
FS-12	Vent Gas Flow	0.0	1.0
FS-12	Steam Flow	0.0	0.0
FS-12	Net Heating Value	0.1	1.5
FS-12	Camera	0.0	0.2
FS-23	Vent Gas Flow	0.0	0.3
FS-23	Steam Flow	0.7	16.5
FS-23	Net Heating Value	0.0	0.3
FS-23	Camera	0.8	17.0
FS-24	Vent Gas Flow	0.0	0.5
FS-24	Steam Flow	0.0	0.0
FS-24	Net Heating Value	0.2	5.5
FS-24	Camera	0.1	1.8

(2) If the total number of hours of Instrument Downtime claimed pursuant to Paragraph 45 exceeds 5% of the time in a Calendar Quarter the Covered Flare affected by the downtime is In Operation, an identification of the periods of downtime by date, time, cause (including Malfunction or maintenance), and, if the cause is asserted to be a Malfunction, the corrective action taken;

Status: No Covered Flare incurred Instrument Downtime claimed pursuant to Paragraph 45 that exceeded 5% of the time the flare was In Operation in any Calendar Quarter, as noted by "None" in Tables 8.3 – 8.4.

TABLE 8.3 3rd Quarter 2019 Instrument Downtime Identification (if total hours exceeds 5%)

Covered Flare	Monitoring System	Start Date/Time	End Date/Time	Cause	Corrective Action
None	None	None	None	None	None

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TABLE 8.4 4th Quarter 2019 Instrument Downtime Identification (if total hours exceeds 5%)

Covered Flare	Monitoring System	Start Date/Time	End Date/Time	Cause	Corrective Action
None	None	None	None	None	None

(3) The total number of hours, expressed as both an absolute number of hours and a percentage of time that the Covered Flare was In Operation, in which the requirements of Paragraphs 43-44 were not applicable because the only gas or gases being vented were Pilot Gas or Purge Gas;

TABLE 8.5 3rd Quarter 2019 Requirements of Paragraphs 43-44 Were Not Applicable Because Only Pilot or Purge Gas Flow Was Vented

Covered Flare	Time (%)	Time (Hours)
FS-9	0.0	0.0
FS-12	0.0	0.0
FS-23	85.7	1,891.3
FS-24	99.2	2,189.9

TABLE 8.6 4th Quarter 2019 Requirements of Paragraphs 43-44 Were Not Applicable Because Only Pilot or Purge Gas Flow Was Vented

Covered Flare	Time (%)	Time (Hours)
FS-9	27.2	601.1
FS-12	0.0	0.0
FS-23	63.0	1,391.8
FS-24	99.9	2,205.5

(4) Exceedances of Combustion Efficiency Standards.

i. The total number of hours, expressed as both an absolute number of hours and a percentage of time the Covered Flare was In Operation, of exceedances of the emissions standards in Paragraphs 43-44; provided however, that if the exceedance of these standards was less than 5% of the time in a Calendar Quarter

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and was due to one or more of the exceptions set forth in Paragraph 45, the report shall so note; and

Status: No exceedance of combustion efficiency standards was due to one or more of the exceptions set forth in Paragraph 45, as noted by "None" in Tables 8.7 – 8.8.

TABLE 8.7 3rd Quarter 2019 Exceedance of Paragraph 43-44 Standards

Covered Flare	Total Exceedance of Emissions Standards		Subset of Exceedances Less Than 5% of the Time in Calendar Quarter and Due to One of the Exceptions Set Forth in Paragraph 45	
	Time (%)	Time (Hours)	Time (%)	Time (Hours)
FS-9	0.0	0.0	None	None
FS-12	0.0	0.0	None	None
FS-23	0.0	0.0	None	None
FS-24	0.0	0.0	None	None

TABLE 8.8 4th Quarter 2019 Exceedance of Paragraph 43-44 Standards

Covered Flare	Total Exceedance of Emissions Standards		Subset of Exceedances Less Than 5% of the Time in Calendar Quarter and Due to One of the Exceptions Set Forth in Paragraph 45	
	Time (%)	Time (Hours)	Time (%)	Time (Hours)
FS-9	0.0	0.0	None	None
FS-12	0.0	0.0	None	None
FS-23	0.0	0.0	None	None
FS-24	0.0	0.0	None	None

ii. If the exceedance of the emissions standards in Paragraphs 43-44 was not due to one of the exceptions in Paragraph 45 (Instrument Downtime), or if the exceedance was due to one or more of the exceptions in Paragraph 45 and the total number of hours caused by the exceptions exceeds 5% of the time in a Calendar Quarter that the Covered Flare affected by the Instrument Downtime was In Operation, an identification of each block period that exceeded the standard, by time and date; the cause of the exceedance (including startup, shutdown, maintenance, or Malfunction), and if the cause is asserted to be a Malfunction, an explanation and any corrective actions taken; and

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Status: No exceedance of combustion efficiency standards occurred in 3rd and 4th Quarter 2019, as noted by "None" in Table 8.9-8.10.

TABLE 8.9 3rd Quarter 2019 Exceedance of Combustion Efficiency Standards Exceeding 5% of the Time in this Period or not due to One of the Exceptions in Paragraph 45

Covered Flare	Combustion Efficiency Standard	Start Date/ Time	End Date/ Time	Cause	Corrective Action
None	None	None	None	None	None

TABLE 8.10 4th Quarter 2019 Exceedance of Combustion Efficiency Standards Exceeding 5% of the Time in this Period or not due to One of the Exceptions in Paragraph 45

Covered Flare	Combustion Efficiency Standard	Start Date/ Time	End Date/ Time	Cause	Corrective Action
None	None	None	None	None	None

(5) Compliance with Compressor Availability Requirements. Sufficient information to document compliance with the FGRS Compressor availability requirements of sub-Paragraph 38.b. For any period of non-compliance, the Defendants must identify the date, cause, and corrective action taken.

Requirements Related to Compressors Being Available for Operation
Requirement: CD Paragraph 38.b.iii.

iii. Baytown Chemical Plant FGRS Operation and Availability.
The Baytown Chemical Plant FGRS must have two Compressors Available for Operation or in operation 100% of the time, three Compressors Available for Operation or in operation 95% of the time, and four Compressors Available for Operation or in operation 90% of the time. The periods provided for in sub-Paragraphs 38.c. and 38.d. below may be included in the amount of time that a Compressor is Available for Operation when determining compliance with the requirement to have a Compressor Available for Operation or in operation.

Status: ExxonMobil Baytown Chemical Plant's Flare Gas Recovery System (FGRS) includes five Compressors that support Covered Flares FS-9, FS-23, and FS-24. These Compressors are C-604A, C-604B, C-4755, C-8755, and C-506. Sub-paragraph 38.b.iii. requires the ExxonMobil Baytown Chemical Plant FGRS to have two Compressors Available for Operation or in operation 100% of the time, three Compressors Available for Operation or in operation 95% of the time, and four Compressors Available for Operation or in operation 90% of the time. The 8,760-hour rolling sum, rolled hourly, began June 6,

2018 for this existing FGRS. The FGRS Compressor availability calculations, using the methodology provided in CD Paragraph 38.f. "Period to be Used for Computing Percentage of Time", demonstrated that the FGRS met the availability requirements, as shown in Table 8.11.

TABLE 8.11 FGRS Operation and Availability

Covered Flare(s)	FGRS Compressor Count	Actual Minimum Availability (%)[1]	Required Minimum Availability (%)
FS-9, FS-23, and FS-24	2	100	100
	3	99	95
	4	93	90

[1] The Actual Minimum Availability provided is the minimum percentage of time that the Baytown Chemical Plant had the listed number of FGRS Compressors Available for Operation or in operation from July 1, 2019 through December 31, 2019, using the 8,760-hour rolling sum, rolled hourly, as prescribed in CD Paragraph 38.f (i.e., the rolling sum included only the previous 8,760 1-hour periods when Potentially Recoverable Gas was generated during all or part of the hour, provided that the Potentially Recoverable Gas was not generated by flows that could not have been prevented through reasonable planning and were in anticipation of or caused by a natural disaster, act of war or terrorism, or External Utility Loss).

Requirements Related to Compressors Being Available for Operation
Requirement: CD Paragraph 38.c.
c. Maintenance of FGRS. Periods of maintenance on and subsequent restart of the Compressor(s) may be included in the amount of time that a Compressor is Available for Operation when determining compliance with the requirement to have a Compressor Available for Operation or in operation; provided however, these periods must not exceed 1,344 hours per Compressor in a five-year rolling sum period, rolled daily. The Defendants must use best efforts to schedule maintenance activities during a turnaround of the process units venting to the Covered Flare(s) served by the applicable FGRS. To the extent it is not practicable to undertake these maintenance activities during a turnaround of these units, the Defendants must use best efforts to minimize the generation of Waste Gas during such periods.

Status: Periods of maintenance on and subsequent restart of the Compressor(s) included in the amount of time that a Compressor is Available for Operation is provided in Table 8.12. These periods do not exceed the 1,344 hours per Compressor in a five-year rolling sum period, rolled daily.

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TABLE 8.12 Periods of Maintenance Included in FGRS Operation and Availability

Covered Flare(s)	FGRS Compressor	Date	Hours	Five-year Rolling Sum (hours)
FS-9, FS-23, and FS-24	C-604A	None	None	0
	C-604B	None	None	0
	C-4755	None	None	0
	C-8755	None	None	0
	C-506	None	None	0

Requirements Related to Compressors Being Available for Operation – FGRS Shut Down
Requirement: CD Paragraph 38.d.
d. FGRS Shut Down. Periods in which the FGRS is shut down (including the subsequent restart) due to operating conditions (such as high temperatures or large quantities of entrained liquid in the Vent Gas) outside the design operating range of the FGRS, including the associated knock-out drum(s), such that the outage is necessary for safety or to preserve the mechanical integrity of the FGRS may be included in the amount of time that a Compressor is Available for Operation when determining compliance with the requirement to have the Compressor Available for Operation or in operation. By no later than 45 Days after any such outage, the Defendants must investigate the root cause and all contributing causes of the outage and must implement, as expeditiously as practicable, corrective action, if any, to prevent a recurrence of the cause(s). In the reports due under Section IX (Reporting Requirements) of this Decree, the Defendants must describe each outage that occurred under the conditions identified in this sub-Paragraph, including the date, duration, cause(s), corrective action, and the status of the implementation of corrective action.

Status: There were no periods when the FGRS was shut down and/or restarted due to operating conditions outside the design operating range of the FGRS, that were also included in FGRS availability as allowed under CD Paragraph 38.d, as noted by "None" in Table 8.13.

TABLE 8.13 FGRS Outages Included in FGRS Availability
July 1, 2019 – December 31, 2019

Covered Flare(s)	FGRS Compressor	Outage Start Date	Duration (hours)	Cause(s)	Corrective Action(s) and Status
None	None	None	None	None	None

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Status: As per Consent Decree Paragraph 66.h(5), there were no periods of FGRS non-compliance, as noted by "None" in Table 8.14.

TABLE 8.14 FGRS Non-Compliance July 1, 2019 – December 31, 2019

Covered Flare(s)	FGRS Compressor	Start Date	Cause(s)	Corrective Action(s)
None	None	None	None	None

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Consent Decree Paragraph 66i.

i. Any additional matters that the Defendants believe should be brought to the attention of EPA, or LDEQ for the Baton Rouge Facilities.

Status: None.

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SECTION 10 FENCELINE AIR MONITORING REPORTS

Consent Decree Paragraph 67a. – b.

The Defendants must submit Fenceline Air Monitoring Reports as part of each Semi-Annual Report. The Fenceline Air Monitoring Reports must contain the following information:

a. In spreadsheet format, the individual sample results for each monitor comprising each Fenceline Monitoring System, each bi-weekly annual average benzene concentration difference value (once annual averages are available), and the corresponding meteorological data for the relevant monitoring periods. The first two columns of each spreadsheet shall be the date and time for each sample taken; and

b. A detailed description of the actions and findings of any root cause analysis and corrective action(s) undertaken pursuant to Paragraph 3(g) of Appendix 2.2, including the known results of the corrective action(s) and the anticipated emissions reductions (in TPY per pollutant).

Status: ExxonMobil Baytown Chemical Plant began collecting fenceline monitoring data May 27, 2019. The individual sample results for the samples that were collected between July 1, 2019 and December 31, 2019 and the corresponding meteorological data for the relevant monitoring periods are provided in Attachment A. The bi-weekly annual average benzene concentration difference value will begin once there are twenty six 14-Day sampling periods.

No root cause analyses or corrective actions were undertaken during this reporting period.

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SECTION 11 ANNUAL EMISSIONS DATA

Consent Decree Paragraph 68

In the Semi-Annual Report that is submitted on February 28 of each year, the Defendants must provide, for each Covered Flare, for the prior calendar year, the amount of emissions of the following compounds (in tons per year): VOCs, HAPs, NOx, CO_2, methane, and ethane.

Status: As of the date of this Semi-Annual Report, the annual emissions are reflected in Table 11.1 below.

TABLE 11.1 2019 Annual Emissions Data

Covered Flare	Emissions (tons per year)					
	VOCs	HAPs	NO_x	CO_2	Methane	Ethane
FS-9	120	10	15	33,896	34	2
FS-12	25	21	8	17,282	39	3
FS-23	6	< 1	3	6,873	19	1
FS-24	< 1	< 1	1	2,142	8	< 1

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SECTION 12 ANY ADDITIONAL NON-COMPLIANCE

Consent Decree Paragraph 69

Each Semi-Annual Report must also include a description of any non-compliance with the requirements of this Consent Decree not otherwise identified by Paragraph 66 along with an explanation of the violation's likely cause and of the remedial steps taken, or to be taken, to prevent or minimize such violation. If the cause of a violation cannot be fully explained at the time the report is due, the Defendants must so state in the report. In such a case, the Defendants must investigate the cause of the violation and then submit an amendment to the report, including a full explanation of the cause of the violation, within 30 Days of the Day the Defendants become aware of the cause of the violation. Nothing in this Paragraph or the following Paragraph relieves the Defendants of their obligation to provide the notice required by Section XI (Force Majeure).

Status: There were no instances of additional non-compliance during the reporting period, as noted by "None" in Table 12.1.

TABLE 12.1 Additional Non-Compliance

Covered Flare	Start Date/ Time	End Date/ Time	Cause	Corrective Action
None	None	None	None	None

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Attachment A
Fenceline Monitoring Data

			Sampler Name	BTCX-01	BTCX-02	BTCX-02A	BTCX-03	BTCX-04	BTCX-05	BTCX-06	BTCX-06A	BTCX-06B	BTCX-07
			Sampler Latitude	29.70339	29.70313	29.70433	29.70702	29.71089	29.71590	29.72111	29.72330	29.72501	29.72675
			Sampler Longitude	-95.00562	-95.00983	-95.01415	-95.01595	-95.01861	-95.01886	-95.01701	-95.01915	-95.01985	-95.01993
Date of Retrieval	Time of Retrieval	Temperature (°C)	Barometric Pressure (hPA)	Benzene Sample Results (ug/m3)									
7/8/2019	14:25	27.2	1016.9	0.8	1.0	0.9	0.8	0.8	0.8	0.8	1.1	1.7	3.6
7/22/2019	14:46	29.9	1013.3	0.7	0.6	1.0	0.6	0.7	0.9	0.9	1.2	1.0	4.5
8/5/2019	15:50	28.4	1016.3	0.8	0.9	1.1	1.0	1.0	1.1	1.1	1.4	5.8	5.2
8/19/2019	13:40	31.1	1013.5	0.6	0.7	0.7	0.7	0.8	0.8	0.8	0.8	1.0	2.1
9/2/2019	13:17	28.9	1014.1	0.5	0.6	0.6	0.6	0.7	0.8	0.8	1.1	2.6	6.8
9/16/2019	14:19	29.2	1016.4	0.6	0.7	0.7	0.6	0.6	0.7	0.8	1.0	2.0	2.6
9/30/2019	11:01	26.7	1013.8	0.4	0.4	0.4	0.3	0.4	0.4	0.4	0.5	0.8	1.0
10/14/2019	14:17	24.7	1015.8	0.7	0.6	0.6	0.9	0.7	0.9	0.9	1.3	1.7	2.5
10/28/2019	14:37	20.4	1013.8	0.6	0.6	0.6	0.7	0.6	0.8	0.7	1.1	1.4	2.1
11/11/2019	14:22	15.4	1021.1	0.9	1.0	1.1	1.1	1.1	1.4	1.4	1.6	1.9	3.1
11/25/2019	14:24	12.9	1019.7	1.1	1.0	1.0	1.2	1.1	1.5	1.6	2.2	2.9	4.1
12/9/2019	13:00	18.0	1017.0	1.0	1.2	1.2	1.1	1.2	1.2	1.3	1.3	1.6	2.4
12/23/2019	12:39	12.5	1021.3	0.9	0.9	1.0	0.8	0.9	1.1	1.2	1.3	1.8	2.6

Attachment A
Fenceline Monitoring Data

	BTCX-08	BTCX-09	BTCX-09A	BTCX-10	BTCX-11	BTCX-11A	BTCX-12	BTCX-13	BTCX-14	BTCX-15	BTCX-16	BTCX-17	BTCX-18
	29.73200	29.73372	29.73829	29.74017	29.74530	29.74846	29.75231	29.75653	29.76039	29.76458	29.76753	29.76932	29.76562
	-95.0187	-95.02188	-95.02417	-95.02613	-95.02778	-95.02826	-95.02715	-95.02400	-95.02859	-95.02896	-95.02609	-95.02070	-95.01826
Date of Retrieval	Benzene Sample Results (ug/m3)												
7/8/2019	10.0	4.2	2.6	2.0	1.8	1.6	1.5	1.6	1.3	1.1	1.4	1.5	1.5
7/22/2019	3.5	5.7	0.9	0.8	0.8	0.9	1.0	1.4	0.9	0.8	1.0	1.3	1.6
8/5/2019	5.3	3.8	2.8	2.5	1.6	1.5	1.4	1.5	1.3	1.4	1.6	1.7	1.6
8/19/2019	4.3	2.9	1.1	1.0	0.9	1.0	1.1	1.2	0.8	0.9	1.3	1.2	1.6
9/2/2019	5.5	4.2	2.1	1.3	1.1	1.1	1.0	1.3	0.8	0.8	1.0	1.1	1.4
9/16/2019	5.9	3.5	2.2	1.7	1.4	1.6	1.5	1.4	1.1	0.9	1.0	1.2	1.1
9/30/2019	2.7	3.5	2.2	2.0	2.2	2.3	2.0	1.6	1.2	1.0	1.0	1.1	0.9
10/14/2019	8.2	4.6	2.9	2.0	1.5	1.5	1.2	1.2	0.9	0.9	0.9	1.0	1.1
10/28/2019	4.4	4.3	2.3	1.8	1.4	1.3	1.3	1.2	1.1	0.9	0.9	1.0	1.0
11/11/2019	6.0	5.1	3.6	2.7	2.2	2.2	1.8	1.7	1.4	1.2	1.1	1.5	1.4
11/25/2019	5.2	5.1	3.2	2.8	2.2	2.3	2.2	1.9	1.8	1.6	1.6	1.7	1.8
12/9/2019	4.4	4.2	2.2	1.7	1.6	1.5	1.8	1.2	1.5	1.2	1.1	1.4	1.6
12/23/2019	4.9	4.7	2.3	1.8	1.5	1.5	1.4	1.3	1.2	1.2	1.1	1.2	1.4

Attachment A
Fenceline Monitoring Data

	BTCX-19	BTCX-20	BTCX-21	BTCX-22	BTCX-22A	BTCX-22B	BTCX-23	BTCX-24	BTCX-24A	BTCX-25	BTCX-26	BTCX-27	BTCX-27A
	29.76251	29.75684	29.75333	29.75030	29.74838	29.75125	29.75307	29.75299	29.75378	29.75421	29.75243	29.75142	29.74902
	-95.01853	-95.01982	-95.01757	-95.01257	-95.00778	-95.00775	-95.00667	-95.00370	-95.0027	-95.00079	-94.99692	-94.99136	-94.99198
Date of Retrieval	Benzene Sample Results (ug/m3)												
7/8/2019	1.6	1.7	2.7	2.1	2.3	1.3	1.1	1.1	1.4	1.4	1.1	0.9	1.0
7/22/2019	2.0	2.5	4.2	5.5	2.6	1.5	1.4	1.1	1.2	1.4	1.0	0.7	1.2
8/5/2019	1.8	1.9	3.5	3.8	1.9	1.4	1.4	1.2	1.4	1.4	1.0	1.0	1.1
8/19/2019	2.0	2.4	5.6	9.6	2.0	1.5	1.6	1.3	1.6	1.4	1.0	1.1	1.7
9/2/2019	1.7	1.9	4.0	4.5	1.5	1.2	1.1	0.9	1.0	1.1	0.8	0.7	1.1
9/16/2019	1.2	1.7	3.1	7.2	1.7	2.0	1.4	1.0	1.2	1.0	0.9	0.8	1.1
9/30/2019	1.3	1.6	3.6	1.4	1.9	1.7	1.3	1.0	1.2	1.0	0.7	0.5	0.8
10/14/2019	1.2	1.3	1.8	1.5	1.6	1.4	1.2	1.1	1.2	0.7	0.7	0.5	0.8
10/28/2019	1.2	1.7	2.0	1.7	1.5	1.1	1.1	1.0	1.4	2.5	1.0	0.7	0.8
11/11/2019	1.3	2.4	2.3	1.8	2.2	1.3	1.1	1.1	1.2	1.0	0.9	0.9	1.0
11/25/2019	1.8	2.1	2.4	2.0	1.5	1.6	1.6	1.4	1.5	1.5	1.2	1.0	1.0
12/9/2019	1.6	1.7	2.1	2.3	2.2	1.4	1.3	1.4	1.5	1.6	1.3	1.1	1.2
12/23/2019	1.4	1.4	1.8	1.7	2.0	1.2	1.2	1.2	1.4	1.3	1.0	0.9	0.9

	BTCX-28	BTCX-28A	BTCX-29	BTCX-29A	BTCX-30	BTCX-31	BTCX-31A	BTCX-32	BTCX-33	BTCX-34	BTCX-35	BTCX-36	BTCX-37	BTCX-38
	29.74708	29.74441	29.74175	29.74033	29.73731	29.73318	29.7342	29.73339	29.73069	29.72654	29.72290	29.71694	29.71178	29.70675
	-94.98970	-94.99190	-94.99376	-94.99481	-94.99666	-94.99928	-95.00400	-95.00724	-95.00908	-95.01043	-95.00856	-95.00904	-95.00906	-95.00709
Date of Retrieval	Benzene Sample Results (ug/m3)													
7/8/2019	0.7	0.8	0.9	1.0	0.7	0.7	0.8	1.1	1.0	0.9	0.7	0.7	0.7	0.7
7/22/2019	0.6	1.3	1.1	1.1	1.0	0.8	0.8	1.0	1.0	1.0	0.8	0.6	0.7	0.6
8/5/2019	0.7	0.9	1.0	1.0	0.8	0.8	1.2	1.1	1.4	1.0	0.8	0.8	0.9	0.8
8/19/2019	0.8	0.9	1.0	1.0	0.7	0.9	0.8	0.9	0.8	0.9	0.7	0.9	0.8	0.7
9/2/2019	0.7	0.7	0.7	0.9	0.7	0.8	1.3	1.2	0.9	1.0	0.7	0.6	0.7	0.6
9/16/2019	0.8	0.8	0.9	1.3	0.7	0.7	0.9	1.4	1.1	0.8	0.8	0.7	0.9	0.6
9/30/2019	0.4	0.4	0.6	0.5	0.4	0.5	0.5	0.5	0.6	0.5	0.5	0.4	0.5	0.4
10/14/2019	0.5	1.1	0.8	1.0	1.1	0.9	1.0	1.1	0.9	0.9	0.8	0.8	0.8	0.8
10/28/2019	0.7	1.1	0.9	1.4	1.0	1.0	2.4	1.2	1.3	1.0	0.9	0.7	0.6	0.6
11/11/2019	0.8	1.5	1.2	1.5	2.1	1.4	1.9	1.7	1.5	1.6	1.5	1.3	1.1	1.3
11/25/2019	0.9	1.6	1.3	1.6	1.6	1.1	1.7	1.8	2.0	1.8	1.6	1.2	1.2	1.0
12/9/2019	1.0	1.9	1.2	1.6	1.3	1.2	1.3	1.5	2.0	1.6	1.3	1.1	1.0	1.1
12/23/2019	0.8	1.4	1.2	1.6	1.6	1.6	1.3	1.5	1.7	1.7	1.6	1.3	1.0	1.0

Exxon Mobil Corporation
3525 Decker Drive
Baytown, TX 77520

ExxonMobil

February 25, 2020

Director, Air Enforcement Division
Office of Civil Enforcement
U.S. Environmental Protection Agency
Mail Code 2242-A
1200 Pennsylvania Ave., N.W.
William Jefferson Clinton Building
Room 1119
Washington, D.C. 20460-0001

Associate Director
Air, Toxics, and Inspections Coordination Branch (6 EN-A)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, TX 75270

RE: Consent Decree, United States vs. Exxon Mobil Corp., Civil Action No. 4:17-cv-3302 (S.D. Tex.), Semi-Annual Reporting Requirements - ExxonMobil Baytown Olefins Plant

To Whom It May Concern:

Pursuant to Section X, Paragraphs 66-73 of Consent Decree, Civil Action No. 4:17-cv-3302, Exxon Mobil Corporation (ExxonMobil) submits this Semi-Annual Report (SAR) covering the period of July 1, 2019 through December 31, 2019.

Certification Statement
Per Consent Decree Paragraph 71:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions about this SAR or require any additional information, please contact Kelly Davis at 346-259-6014 or kelly.e.davis@exxonmobil.com.

Sincerely,

Jason S. Duncan
BOP Plant Manager
ExxonMobil Baytown Olefins Plant

Attachment

cc: EES Case Management Unit
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044-7611
Re: DJ # 90-5-2-1-10128 and 10128/1

United States Attorney
Southern District of Texas
Andrew A. Bobb
Assistant U.S. Attorney
1000 Louisiana St., Suite 2300
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Baytown Olefins Plant

Baytown, Texas

SEMI-ANNUAL REPORT
PURSUANT TO CONSENT DECREE,
UNITED STATES, ET AL V. EXXON MOBIL CORPORATION AND EXXONMOBIL OIL CORPORATION,
CIVIL ACTION NO. 4:17-cv-3302 (S.D. Tex.)

July 1, 2019 – December 31, 2019

3525 Decker Drive

Baytown, Texas

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Attachment A – Fenceline Monitoring Data

SECTION 1 STATUS OF CONSENT DECREE SECTION V COMPLIANCE REQUIREMENTS

This progress report provides the status of implementation of Consent Decree requirements that, during the reporting period, require the ExxonMobil Baytown Olefins Plant to undertake a specific action or make a submittal to an agency; or otherwise require the ExxonMobil Baytown Olefins Plant to take specific steps to implement new obligations, including new control or emissions requirements, new monitoring requirements, or institution of new procedures. Once the ExxonMobil Baytown Olefins Plant has reported a requirement as implemented, it will not appear in subsequent progress reports under this subparagraph.

Consent Decree Paragraph 66.a. – b.

a. A description of the status of work performed and progress made toward implementing all requirements of Consent Decree Section V Compliance Requirements at the Covered Facilities. This topic should describe any major milestones completed and remaining to be completed;

Status: ExxonMobil Baytown Olefins Plant completed all remaining work as required to meet the requirements of Consent Decree Section V Compliance Requirements in the prior reporting period. There were no major milestones completed for this reporting period, as noted by "None" in Table 1.1.

TABLE 1.1 Major Milestones Completed For This Reporting Period

Applicability	Description of Work Completed During This Reporting Period	Completion Date
None	None	None

Status: There is no remaining work to be completed by the ExxonMobil Baytown Olefins Plant to meet the requirements of Consent Decree Section V Compliance Requirements, as noted by "None" in Table 1.2.

TABLE 1.2 Status of Remaining Work to be Completed

Applicability	Remaining Work To Be Completed	Anticipated Completion Date
None	None	None

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b. A description of any problems encountered or anticipated in meeting the requirements in Consent Decree Section V Compliance Requirements at the Covered Facilities, together with implemented or proposed solutions;

Status: ExxonMobil Baytown Olefins Plant has not encountered problems and does not anticipate problems in meeting the requirements of Consent Decree Section V Compliance Requirements, as noted by "None" in Table 1.3.

TABLE 1.3 Encountered or Anticipated Problems in Work to be Completed

Covered Flare	Encountered or Anticipated Problem(s)	Proposed or Implemented Solution(s)
None	None	None

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SECTION 2 STATUS OF CONSENT DECREE SECTION V REPORTING REQUIREMENTS

Below is a summary of the status of reports as required under Consent Decree Section V.

Flare Data and Monitoring Systems and Protocol Report
Requirement: Consent Decree Paragraph 18
Description: For each Covered Flare, by no later than 365 Days after the Effective Date, the Defendants must submit a report, consistent with the requirements in Appendix 1.5, to EPA that includes the following:

a. The information, diagrams, and drawings specified in Paragraphs 1–7 of Appendix 1.5;
b. A detailed description of each instrument and piece of monitoring equipment, including the specific model and manufacturer, that the Defendants have installed or will install in compliance with Paragraphs 20–24 of this Consent Decree (Paragraphs 8–9 of Appendix 1.5); and
c. A narrative description of the monitoring methods and calculations that the Defendants will use to comply with the requirements of Paragraph 43 (Paragraph 10 of Appendix 1.5).

Status: The Flare Data and Monitoring Systems and Protocol Report was submitted by the Baytown Olefins Plant on June 6, 2019.

Initial Waste Gas Minimization Plan ("Initial WGMP")
Requirement: Consent Decree Paragraph 29
Description: By no later than 365 Days after the Effective Date, for each Covered Flare, the Defendants must submit to EPA an Initial Waste Gas Minimization Plan that discusses and evaluates flaring Prevention Measures on both a facility-wide and Covered Flare-specific basis for each Covered Facility.

Status: The Initial Waste Gas Minimization Plan was submitted by the Baytown Olefins Plant on June 6, 2019.

First Updated Waste Gas Minimization Plan ("First Updated WGMP")
Requirement: Consent Decree Paragraph 30
Description: By no later than 730 Days after the Effective Date, the Defendants must submit to EPA a First Updated WGMP that updates, if and as necessary, the information, diagrams, and drawings required in the Flare Data and Monitoring Systems and Protocol Report required by Paragraph 18 and the information required in sub-Paragraphs 29.a–29.e for the 12-month period after the period covered by the Initial Waste Gas Minimization Plan.

Status: This section does not apply to this semi-annual reporting period. The first Updated Waste Gas Minimization Plan submittal is due no later than June 5, 2020.

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Consent Decree Paragraph 66.c.

c. A description of the status of any permit applications, including a summary of all permitting activity, pertaining to compliance with this Consent Decree;

Status: ExxonMobil Baytown Olefins Plant submitted a permit application to TCEQ's Air Permits Division for Permit 3452/PSD-TX-302M2/PAL6 on May 17, 2019. The altered permit was issued September 16, 2019, and incorporated the requirements listed in the Consent Decree Paragraph 60.c such that the requirements (i) become and remain "applicable requirements" as that term is defined in 40 C.F.R. §70.2 and (ii) survive the termination of the Consent Decree.

ExxonMobil Baytown Olefins Plant submitted a permit application to TCEQ's Air Permits Division for Title V Permit O1553 on January 27, 2020 to incorporate the requirements listed in the Consent Decree Paragraph 60.c into Title V Permit O1553 through incorporation of Permit 3452/PSD-TX-302M2/PAL6 issued September 16, 2019. In accordance with Consent Decree Paragraph 60.b., the permit application was submitted no later than three years after the Effective Date or one year after the respective deadline for the Compliance Requirements listed in Paragraph 60.c.

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Consent Decree Paragraph 66.d.

d. A copy of any reports that were submitted only to LDEQ and that pertain to compliance with this Consent Decree.

Status: This section does not apply because the ExxonMobil Baytown Olefins Plant is located in the State of Texas and therefore does not submit reports to LDEQ.

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Consent Decree Paragraph 66.e.

e. A description of the Defendants' progress in satisfying its obligations in connection with the SEP(s) under Section VI including, at a minimum, a narrative description of activities undertaken; status of any construction or compliance measures, including the completion of any milestones set forth in the SEP Work Plan, and a summary of costs incurred since the previous report;

Refer to Semi-Annual Report submitted by the ExxonMobil Baytown Chemical Plant for status of the Federal Supplemental Environmental Project (SEP).

The Louisiana Beneficial Environmental Projects (BEPs) have been completed. Refer to the Semi-Annual Report submitted by the ExxonMobil Baton Rouge Chemical Plant for supporting information and documentation.

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Consent Decree Paragraph 66.f.

f. Any updated WGMP for the Covered Facilities that is required to be submitted by Paragraph 31.

Subsequent Updates to WGMPs ("Subsequently Updated WGMP")
Requirement: Consent Decree Paragraph 31
On an annual basis after submitting the First Updated WGMP until termination of the Decree, the Defendants must submit an updated WGMP for a Covered Facility as part of the Semi-Annual Report required by Section IX (Reporting Requirements) if, at that Covered Facility, the Defendants: a) commence operation of a Newly Installed Covered Flare or permanently remove a Covered Flare from service, b) connect a new Waste Gas stream to a Covered Flare, c) intentionally modify the Baseload Waste Gas Flow Rate to a Covered Flare, d) install additional FGRS, or e) change the design of a Covered Flare. Each update must update, if and as necessary, the information required in sub-Paragraphs 29.a.i - 29.a.iii. Each update must update, if and as necessary, the information required in sub-Paragraphs 30.a and 30.b. To the extent the Defendants propose to extend any schedule set forth in a previous WGMP for any of the Covered Facilities, the Defendants may do so only with good cause, the determination of which is subject to Section XII (Dispute Resolution).

Status: The Initial Waste Gas Minimization Plan was submitted by the Baytown Olefins Plant on June 6, 2019. The first Updated Waste Gas Minimization Plan submittal is due no later than June 5, 2020. Subsequent updates, if necessary, will be made on an annual basis as part of the Semi-Annual Report.

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SECTION 7 SUMMARY OF INTERNAL FLARING INCIDENT REPORTS

Consent Decree Paragraph 66.g.

g. Any summary of internal flaring incident reports as required by Paragraph 34.

Submitting Summary of Internal Flaring Incident Reports
Requirement: CD Paragraph 34b.
In each Semi-Annual Report due under Section IX (Reporting Requirements), the Defendants must include a summary of the following items for each Reportable Flaring Incident that occurred during the six-month period that the Semi-Annual Report covers:

i. Date;
ii. Duration;
iii. Amount of VOCs and HAPs emitted;
iv. Root cause(s);
v. Corrective action(s) completed;
vi. Corrective action(s) still outstanding; and
vii. An analysis of any trends identified by the Defendants in the number of Reportable Flaring Incidents, the root causes, or the types of corrective action(s).

Status: In accordance with Paragraph 34.a. of the Consent Decree, ExxonMobil Baytown Olefins Plant began monitoring for Reportable Flaring Incidents (RFIs) on June 6, 2019. A summary of RFIs that occurred from July 1, 2019 through December 31, 2019 are provided in Table 7.1.

TABLE 7.1 July 1 – December 31, 2019
Summary of Internal Flaring Incident Reports

ED_004791B_00000216-00012

Date	Duration (hours)	Amount Emitted	
		VOCs (pounds)	HAPs (pounds)
7/9/2019 22:54 – 7/10/2019 08:48	9.9	461	49
Covered Flare(s)	Primary Flare, Secondary Flare, BOP-X Flare		
Root Cause(s)	The moisture analyzer on the outlet of process gas drier LD-09 failed, resulting in hydrate formation downstream in the chill train exchangers.		
Corrective Action(s) Completed	1. Updated maintenance scheduling system for all analyzer PMs. 2. Updated Catalyst/Desiccant Job Aid to include a step to perform a moisture load test ahead of a changeout in order to appropriately set console moisture breakthrough alarms.		
Corrective Action(s) Still Outstanding	None		

Date	Duration (hours)	Amount Emitted	
		VOCs (pounds)	HAPs (pounds)
7/23/2019 10:22 – 7/23/2019 18:59	8.6	151	41
Covered Flare(s)	Primary Flare		
Root Cause(s)	Residual moisture in the air blower lines on Boiler ZU04 C made contact with the flame scanner lenses, causing the flame scanner signals to read no flame and resulting in shutdown of ZU04 C and loss of disposition for flare gas recovery system.		
Corrective Action(s) Completed	Updated air blower switch check task to include a step to clean the flame scanner lenses before switching air blowers.		
Corrective Action(s) Still Outstanding	Evaluate addition of low point drain location in air blower lines.		

ED_004791B_00000216-00013

Date	Duration (hours)	Amount Emitted	
		VOCs (pounds)	HAPs (pounds)
7/31/2019 10:45 – 8/7/2019 15:19	172.6	56,938	17,075
Covered Flare(s)	Primary Flare, Secondary Flare, BOP-X Flare		
Root Cause(s)	Formation of popcorn polymer in a stagnant zone of the Propylene Recovery Unit (PRU) NT-01 depropanizer reboiler circuit led to ductile failure due to stress of the 20" reboiler return line (PP-2060) and flaring.		
Corrective Action(s) Completed	Removed PP-2060 (reboiler outlet to top section of NT-01) from the bottoms circuit design for replacement tower NT-01A.		
Corrective Action(s) Still Outstanding	1. Revise the Technology Tier 1 Best Practice for mitigation of popcorn polymer to include depropanizer tower and bottoms circuits at the Baytown Olefins Plant. 2. Revise the Olefins Safety Primer for mitigation of popcorn polymer to include depropanizer tower and bottoms circuits at the Baytown Olefins Plant. 3. Implement the revised Technology Tier 1 Best Practice for mitigation of popcorn polymer to include depropanizer tower and bottoms circuits at the Baytown Olefins Plant.		

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Date	Duration (hours)	Amount Emitted	
		VOCs (pounds)	HAPs (pounds)
8/14/2019 02:00 – 8/15/2019 06:30	28.5	1,146	90
Covered Flare(s)	Primary Flare		
Root Cause(s)	A leak caused by corrosion under insulation (CUI) was discovered on small bore piping to pressure instrument TP-029 on the overhead of the propylene concentrator tower TT-04. In order to stop the leak, the propylene concentrator towers TT-03 and TT-04 were deinventoried to the flare gas recovery system.		
Corrective Action(s) Completed	Repaired small bore piping to pressure instrument TP-029.		
Corrective Action(s) Still Outstanding	None		

Date	Duration (hours)	Amount Emitted	
		VOCs (pounds)	HAPs (pounds)
8/19/2019 09:05 – 8/19/2019 14:50	5.8	142	12
Covered Flare(s)	Primary Flare, BOP-X Flare		
Root Cause(s)	Per procedure, FGR Compressor ZC-03 was placed in a reduced recovery mode in order to calibrate the specific gravity analyzer YA0110.		
Corrective Action(s) Completed	None		
Corrective Action(s) Still Outstanding	None		

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Date	Duration (hours)	Amount Emitted	
		VOCs (pounds)	HAPs (pounds)
8/22/2019 20:23 – 8/23/2019 00:44	4.3	724	33
Covered Flare(s)	Primary Flare, Secondary Flare, BOP-X Flare		
Root Cause(s)	PRU overhead knockout drum TD-01 to caustic tower TT-01 was drained and depressured to the flare gas recovery system in preparation for planned mechanical work.		
Corrective Action(s) Completed	Replaced affected piping in the TT-01 bottoms wash water circuit.		
Corrective Action(s) Still Outstanding	None		

Date	Duration (hours)	Amount Emitted	
		VOCs (pounds)	HAPs (pounds)
10/18/2019 08:08 – 10/26/2019 22:07	206.0	6,815	101
Covered Flare(s)	Primary Flare, Secondary Flare, BOP-X Flare		
Root Cause(s)	The planned start-up of Base BOP on 10/18/2019 followed the unplanned shut-down that began on 7/31/2019.		
Corrective Action(s) Completed	Procedures were followed and the start-up was expeditiously completed in a safe manner, ending RFI.		
Corrective Action(s) Still Outstanding	None		

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Date	Duration (hours)	Amount Emitted	
		VOCs (pounds)	HAPs (pounds)
10/30/2019 07:56 – 10/30/2019 11:24	3.5	79	30
Covered Flare(s)	Primary Flare		
Root Cause(s)	Specific gravity analyzer YA0110 and oxygen analyzer YA670 were taken out of service in order to perform maintenance on the analyzers. Per procedure, ZC-03 was placed in a reduced recovery mode. During the maintenance, the YA900 gas chromatograph (GC) at the Primary Flare did not provide valid readings, preventing the site from calculating and subtracting out the nitrogen volume from the waste gas total volume, as allowed in the Consent Decree definition of "Reportable Flaring Incident" (12.jjj).		
Corrective Action(s) Completed	Evaluated and adjusted operating parameters on the YA900 GC to improve performance to minimize GC outages that would prevent the site from calculating and subtracting out the nitrogen volume from the waste gas total volume.		
Corrective Action(s) Still Outstanding	None		

Date	Duration (hours)	Amount Emitted	
		VOCs (pounds)	HAPs (pounds)
11/22/2019 11:28 – 11/22/2019 19:33	8.1	206	26
Covered Flare(s)	Primary Flare		
Root Cause(s)	Specific gravity analyzer YA0110 was taken out of service in order to perform maintenance on the analyzer's zirconia oxide cell. Per procedure, FGR Compressor ZC-03 was placed in a reduced recovery mode.		
Corrective Action(s) Completed	Replaced YA0110 zirconia cell holder.		
Corrective Action(s) Still Outstanding	None		

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Date	Duration (hours)	Amount Emitted	
		VOCs (pounds)	HAPs (pounds)
12/12/2019 11:26 – 12/17/2019 21:27	130.0	16,044	1,515
Covered Flare(s)	Primary Flare, BOP-X Flare		
Root Cause(s)	An error in the programming download to the propylene refrigeration compressor's (XVC-01) Triconex system resulted in a reduction in XVC-01's speed. This reduction led to the isolation of the BOP-X cold box and safe utilization of the flare system. During the reintroduction of feed into XME-02 (demethanizer feed propylene chiller), increased delta pressure led to the repeat isolation of the cold box and safe utilization of the flare system.		
Corrective Action(s) Completed	Corrected XVC-01 Triconex programming.		
Corrective Action(s) Still Outstanding	Conduct Triconex Governor Controls training.		

Paragraph 34.b.vii. of the Consent Decree requires an analysis of any trends identified in the number of Reportable Flaring Incidents, the root causes, or the types of corrective actions(s).

Status: ExxonMobil Baytown Olefins Plant did not identify trends in the number of RFIs, the root causes, or the types of corrective action(s).

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Consent Decree Paragraph 66.h.

h. A summary of the following, per Covered Flare per Calendar Quarter (hours shall be rounded to the nearest tenth):

(1) The total number of hours of Instrument Downtime claimed pursuant to Paragraph 45, expressed as both an absolute number and a percentage of time the Covered Flare that the instrument/equipment monitors is In Operation and Capable of Receiving Sweep, Supplemental, and/or Waste Gas;

TABLE 8.1 3rd Quarter 2019 Instrument Downtime Summary

Covered Flare	Monitoring System	System Downtime (%)	System Downtime (hours)
Primary Flare	Waste Gas Flow (ZD02)	0.0	0.0
Primary Flare	Waste Gas Flow (BD)	5.6	124.3
Primary Flare	Purge Gas Flow	0.0	0.0
Primary Flare	Supplemental Gas Flow	0.0	0.0
Primary Flare	Steam Flow	0.0	0.0
Primary Flare	Net Heating Value (ZD02)	0.3	6.5
Primary Flare	Net Heating Value (BD)	3.6	79.0
Primary Flare	Camera	0.0	0.1
Secondary Flare	Waste Gas Flow	0.4	8.8
Secondary Flare	Purge Gas Flow	0.0	0.0
Secondary Flare	Steam Flow	0.9	19.8
Secondary Flare	Net Heating Value	0.1	2.3
Secondary Flare	Camera	0.0	0.1
BOP-X Flare	Vent Gas Flow	0.1	1.5
BOP-X Flare	Steam Flow	0.0	0.0
BOP-X Flare	Net Heating Value	0.0	0.5
BOP-X Flare	Camera	0.0	0.0

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TABLE 8.2 4th Quarter 2019 Instrument Downtime Summary

Covered Flare	Monitoring System	System Downtime (%)	System Downtime (hours)
Primary Flare	Waste Gas Flow (ZD02)	0.1	1.8
Primary Flare	Waste Gas Flow (BD)	0.1	2.3
Primary Flare	Purge Gas Flow	0.0	0.0
Primary Flare	Supplemental Gas Flow	0.0	0.0
Primary Flare	Steam Flow	0.0	0.0
Primary Flare	Net Heating Value (ZD02)	0.1	1.3
Primary Flare	Net Heating Value (BD)	0.0	0.5
Primary Flare	Camera	0.0	0.0
Secondary Flare	Waste Gas Flow	0.1	1.3
Secondary Flare	Purge Gas Flow	0.0	0.0
Secondary Flare	Steam Flow	0.1	3.3
Secondary Flare	Net Heating Value	0.0	0.8
Secondary Flare	Camera	0.0	0.0
BOP-X Flare	Vent Gas Flow	0.1	1.5
BOP-X Flare	Steam Flow	0.0	0.0
BOP-X Flare	Net Heating Value	0.0	0.5
BOP-X Flare	Camera	0.0	0.0

(2) If the total number of hours of Instrument Downtime claimed pursuant to Paragraph 45 exceeds 5% of the time in a Calendar Quarter the Covered Flare affected by the downtime is In Operation, an identification of the periods of downtime by date, time, cause (including Malfunction or maintenance), and, if the cause is asserted to be a Malfunction, the corrective action taken;

Status: ExxonMobil Baytown Olefins Plant incurred Instrument Downtime claimed pursuant to Paragraph 45 that exceeded 5% of the time the Flare was In Operation in the 3rd Quarter, as shown in Table 8.3. No Covered Flare incurred Instrument Downtime claimed pursuant to Paragraph 45 that exceeded 5% of the time the Flare was In Operation in the 4th Quarter, as noted by "None" in Table 8.4.

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TABLE 8.3 3rd Quarter 2019 Instrument Downtime Identification (if total hours exceeds 5%)

Covered Flare	Monitoring System	Start Date/Time	End Date/Time	Cause	Corrective Action
Primary Flare	Waste Gas Flow (BD)	7/31/2019 11:00	8/5/2019 15:14	An upset event at PRU NT-01 depropanizer caused the BD waste gas flow monitoring system instruments to malfunction, experiencing a loss of signal due to a damaged homerun cable.	Installed jump-over to restore signal functionality.

TABLE 8.4 4th Quarter 2019 Instrument Downtime Identification (if total hours exceeds 5%)

Covered Flare	Monitoring System	Start Date/Time	End Date/Time	Cause	Corrective Action
None	None	None	None	None	None

(3) The total number of hours, expressed as both an absolute number of hours and a percentage of time that the Covered Flare was In Operation, in which the requirements of Paragraphs 43-44 were not applicable because the only gas or gases being vented were Pilot Gas or Purge Gas;

TABLE 8.5 3rd Quarter 2019 Requirements of Paragraphs 43-44 Were Not Applicable Because Only Pilot or Purge Gas Flow Was Vented

Covered Flare	Time (%)	Time (Hours)
Primary Flare	55.4	1,222.9
Secondary Flare	95.5	2,109.5
BOP-X Flare	96.1	2,122.4

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TABLE 8.6 4th Quarter 2019 Requirements of Paragraphs 43-44 Were Not Applicable Because Only Pilot or Purge Gas Flow Was Vented

Covered Flare	Time (%)	Time (Hours)
Primary Flare	82.8	1,827.9
Secondary Flare	99.2	2,190.3
BOP-X Flare	96.1	2,122.4

(4) Exceedances of Combustion Efficiency Standards.

i. The total number of hours, expressed as both an absolute number of hours and a percentage of time the Covered Flare was In Operation, of exceedances of the emissions standards in Paragraphs 43-44; provided however, that if the exceedance of these standards was less than 5% of the time in a Calendar Quarter and was due to one or more of the exceptions set forth in Paragraph 45, the report shall so note; and

Status: No exceedance of combustion efficiency standards was due to one or more of the exceptions set forth in Paragraph 45, as noted by "None" in Tables 8.7 – 8.8.

TABLE 8.7 3rd Quarter 2019 Exceedance of Paragraph 43-44 Standards

Covered Flare	Total Exceedance of Emissions Standards		Subset of Exceedances Less Than 5% of the Time in Calendar Quarter and Due to One of the Exceptions Set Forth in Paragraph 45	
	Time (%)	Time (Hours)	Time (%)	Time (Hours)
Primary Flare	0.0	0.0	None	None
Secondary Flare	0.9	20.5	None	None
BOP-X Flare	0.0	0.0	None	None

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TABLE 8.8 4th Quarter 2019 Exceedance of Paragraph 43-44 Standards

Covered Flare	Total Exceedance of Emissions Standards		Subset of Exceedances Less Than 5% of the Time in Calendar Quarter and Due to One of the Exceptions Set Forth in Paragraph 45	
	Time (%)	Time (Hours)	Time (%)	Time (Hours)
Primary Flare	0.0	0.0	None	None
Secondary Flare	0.4	8.8	None	None
BOP-X Flare	0.0	0.5	None	None

ii. If the exceedance of the emissions standards in Paragraphs 43-44 was not due to one of the exceptions in Paragraph 45 (Instrument Downtime), or if the exceedance was due to one or more of the exceptions in Paragraph 45 and the total number of hours caused by the exceptions exceeds 5% of the time in a Calendar Quarter that the Covered Flare affected by the Instrument Downtime was In Operation, an identification of each block period that exceeded the standard, by time and date; the cause of the exceedance (including startup, shutdown, maintenance, or Malfunction), and if the cause is asserted to be a Malfunction, an explanation and any corrective actions taken; and

Status: Exceedances of combustion efficiency standards, not due to one of the exceptions in Paragraph 45, during the 3rd and 4th Quarters 2019, are listed in Tables 8.9 – 8.10.

TABLE 8.9 3rd Quarter 2019 Exceedance of Combustion Efficiency Standards Exceeding 5% of the Time in this Period or not due to One of the Exceptions in Paragraph 45

Covered Flare	Combustion Efficiency Standard	Start Date/ Time	End Date/ Time	Cause	Corrective Action
Secondary Flare	NHVcz	7/31/2019 12:45	8/4/2019 06:29	Manual steam controls were utilized to manage Visible Emissions, resulting in excess steam flow to the flare.	The flaring ended.
Secondary Flare	NHVcz	8/22/2019 20:30	8/22/2019 20:44	Vent Gas to steam ratio sent to the flare was insufficient to maintain NHVcz.	Flare controls were tuned.

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TABLE 8.10 4th Quarter 2019 Exceedance of Combustion Efficiency Standards Exceeding 5% of the Time in this Period or not due to One of the Exceptions in Paragraph 45

Covered Flare	Combustion Efficiency Standard	Start Date/ Time	End Date/ Time	Cause	Corrective Action
Secondary Flare	NHVcz	10/23/2019 20:15	10/25/2019 20:44	During startup of Base BOP, low NHV Vent Gas was sent to the flare at low flow rates, resulting in insufficient Vent Gas to steam ratio.	The flaring ended.
Secondary Flare	NHVvg	10/24/2019 00:30	10/25/2019 13:14	During startup of Base BOP, low NHV Vent Gas was sent to the flare without any supplemental gas addition.	The flaring ended.
BOP-X Flare	NHVcz	12/13/2019 15:45	12/13/2019 16:14	Manual steam controls were utilized to manage Visible Emissions, resulting in excess steam flow to the flare.	Steam flow was reduced and steam controls were restored.

(5) Compliance with Compressor Availability Requirements. Sufficient information to document compliance with the FGRS Compressor availability requirements of sub-Paragraph 38.b. For any period of non-compliance, the Defendants must identify the date, cause, and corrective action taken.

Requirements Related to Compressors Being Available for Operation

Requirement: CD Paragraph 38.b.i.

i. Baytown Olefins Plant FGRS Operation and Availability.

(1) The Baytown Olefins Plant FGRS must have one Compressor Available for Operation or in operation 98% of the time. The periods provided for in sub-Paragraphs 38.c. and 38.d. below may be included in the amount of time that a Compressor is Available for Operation when determining compliance with the requirement to have a Compressor Available for Operation or in operation.

(2) During turnaround periods that occur approximately every 8-10 years in which fuel gas consumers are shutdown and unable to use Waste Gas recovered by the FGRS, the Baytown Olefins Plant may use, in lieu of the Baytown Olefins Plant FGRS, a thermal oxidizer that achieves at least a 98% CE to combust the amount of Waste Gas that cannot be used by fuel gas consumers during the turnaround period.

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Status: ExxonMobil Baytown Olefins Plant's Flare Gas Recovery System (FGRS) includes one Compressor, C-03, that supports Covered Flares Primary Flare, Secondary Flare, and BOP-X Flare. Sub-paragraph 38.b.i. requires the ExxonMobil Baytown Olefins Plant FGRS to have one Compressor Available for Operation or in operation 98% of the time. The 8,760-hour rolling sum, rolled hourly, began June 6, 2018 for this existing FGRS. The FGRS Compressor availability calculations, using the methodology provided in CD Paragraph 38.f. "Period to be Used for Computing Percentage of Time", demonstrated that the FGRS had one Compressor Available for Operation or in operation at least 98% of the time, as shown in Table 8.11.

TABLE 8.11 FGRS Operation and Availability

Covered Flare(s)	FGRS Compressor	Actual Minimum Availability (%)[1]	Required Minimum Availability (%)
Primary Flare, Secondary Flare, and BOP-X Flare	C-03	100	98

[1] The Actual Minimum Availability provided is the minimum percentage of time that the Baytown Olefins Plant had one Compressor Available for Operation or in operation from July 1, 2019 through December 31, 2019, using the 8,760-hour rolling sum, rolled hourly, as prescribed in CD Paragraph 38.f (i.e., the rolling sum included only the previous 8,760 1-hour periods when Potentially Recoverable Gas was generated during all or part of the hour, provided that the Potentially Recoverable Gas was not generated by flows that could not have been prevented through reasonable planning and were in anticipation of or caused by a natural disaster, act of war or terrorism, or External Utility Loss).

Requirements Related to Compressors Being Available for Operation

Requirement: CD Paragraph 38.c.

c. Maintenance of FGRS. Periods of maintenance on and subsequent restart of the Compressor(s) may be included in the amount of time that a Compressor is Available for Operation when determining compliance with the requirement to have a Compressor Available for Operation or in operation; provided however, these periods must not exceed 1,344 hours per Compressor in a five-year rolling sum period, rolled daily. The Defendants must use best efforts to schedule maintenance activities during a turnaround of the process units venting to the Covered Flare(s) served by the applicable FGRS. To the extent it is not practicable to undertake these maintenance activities during a turnaround of these units, the Defendants must use best efforts to minimize the generation of Waste Gas during such periods.

Status: Periods of maintenance on and subsequent restart of the Compressor(s) included in the amount of time that a Compressor is Available for Operation is provided in Table 8.12. These periods do not exceed the 1,344 hours per Compressor in a five-year rolling sum period, rolled daily.

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TABLE 8.12 Periods of Maintenance Included in FGRS Operation and Availability

Covered Flare(s)	FGRS Compressor	Date	Hours	Five-year Rolling Sum (hours)
Primary Flare, Secondary Flare, and BOP-X Flare	C-03	None	None	0

Requirements Related to Compressors Being Available for Operation – FGRS Shut Down
Requirement: CD Paragraph 38d.
d. FGRS Shut Down. Periods in which the FGRS is shut down (including the subsequent restart) due to operating conditions (such as high temperatures or large quantities of entrained liquid in the Vent Gas) outside the design operating range of the FGRS, including the associated knock-out drum(s), such that the outage is necessary for safety or to preserve the mechanical integrity of the FGRS may be included in the amount of time that a Compressor is Available for Operation when determining compliance with the requirement to have the Compressor Available for Operation or in operation. By no later than 45 Days after any such outage, the Defendants must investigate the root cause and all contributing causes of the outage and must implement, as expeditiously as practicable, corrective action, if any, to prevent a recurrence of the cause(s). In the reports due under Section IX (Reporting Requirements) of this Decree, the Defendants must describe each outage that occurred under the conditions identified in this sub-Paragraph, including the date, duration, cause(s), corrective action, and the status of the implementation of corrective action.

Status: There were no periods when the FGRS was shut down and/or restarted due to operating conditions outside the design operating range of the FGRS, that were also included in FGRS availability as allowed under CD Paragraph 38.d, as noted by "None" in Table 8.13.

TABLE 8.13 FGRS Outages Included in FGRS Availability
July 1, 2019 – December 31, 2019

Covered Flare(s)	FGRS Compressor	Outage Start Date	Duration (hours)	Cause(s)	Corrective Action(s) and Status
None	None	None	None	None	None

Status: As per Consent Decree Paragraph 66.h(5), there were no periods of FGRS non-compliance, as noted by "None" in Table 8.14.

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TABLE 8.14 FGRS Non-Compliance July 1, 2019 – December 31, 2019

Covered Flare(s)	FGRS Compressor	Start Date	Cause(s)	Corrective Action(s)
None	None	None	None	None

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SECTION 9 ADDITIONAL MATTERS

Consent Decree Paragraph 66.i.

i. Any additional matters that the Defendants believe should be brought to the attention of EPA, or LDEQ for the Baton Rouge Facilities.

Status: None.

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SECTION 10 FENCELINE AIR MONITORING REPORTS

Consent Decree Paragraph 67.a. – b.

The Defendants must submit Fenceline Air Monitoring Reports as part of each Semi-Annual Report. The Fenceline Air Monitoring Reports must contain the following information:

a. In spreadsheet format, the individual sample results for each monitor comprising each Fenceline Monitoring System, each bi-weekly annual average benzene concentration difference value (once annual averages are available), and the corresponding meteorological data for the relevant monitoring periods. The first two columns of each spreadsheet shall be the date and time for each sample taken; and

b. A detailed description of the actions and findings of any root cause analysis and corrective action(s) undertaken pursuant to Paragraph 3(g) of Appendix 2.2, including the known results of the corrective action(s) and the anticipated emissions reductions (in TPY per pollutant).

Status: ExxonMobil Baytown Olefins Plant began collecting fenceline monitoring data on May 27, 2019. The individual sample results for the samples that were collected between July 1, 2019 and December 31, 2019 and the corresponding meteorological data for the relevant monitoring periods are provided in Attachment A. The bi-weekly annual average benzene concentration difference value will begin once there are twenty six 14-Day sampling periods.

No root cause analyses or corrective actions were undertaken during this reporting period.

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SECTION 11 ANNUAL EMISSIONS DATA

Consent Decree Paragraph 68

In the Semi-Annual Report that is submitted on February 28 of each year, the Defendants must provide, for each Covered Flare, for the prior calendar year, the amount of emissions of the following compounds (in tons per year): VOCs, HAPs, NOx, CO2, methane, and ethane.

Status: As of the date of this Semi-Annual Report, the annual emissions are reflected in Table 11.1 below.

TABLE 11.1 2019 Annual Emissions Data

Covered Flare	Emissions (tons per year)					
	VOCs	HAPs	NO_x	CO_2	Methane	Ethane
Primary Flare	59	9	10	7,064	2,763	492
Secondary Flare	10	< 1	2	4,016	363	149
BOP-X Flare	22	5	10	23,187	4,730	784

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SECTION 12 ANY ADDITIONAL NON-COMPLIANCE

Consent Decree Paragraph 69

Each Semi-Annual Report must also include a description of any non-compliance with the requirements of this Consent Decree not otherwise identified by Paragraph 66 along with an explanation of the violation's likely cause and of the remedial steps taken, or to be taken, to prevent or minimize such violation. If the cause of a violation cannot be fully explained at the time the report is due, the Defendants must so state in the report. In such a case, the Defendants must investigate the cause of the violation and then submit an amendment to the report, including a full explanation of the cause of the violation, within 30 Days of the Day the Defendants become aware of the cause of the violation. Nothing in this Paragraph or the following Paragraph relieves the Defendants of their obligation to provide the notice required by Section XI (Force Majeure).

TABLE 12.1 Additional Non-Compliance

Covered Flare	Start Date/ Time	End Date/ Time	Cause	Corrective Action
Secondary Flare	7/31/2019 10:53	7/31/2019 12:07	Visible Emissions exceeded a total of 5 minutes during any 2 consecutive hours due to an upset event at NT-01 that resulted in the flaring of Waste Gas that was continually fluctuating in composition.	Steam flow was increased as waste gas flow decreased.
Primary Flare	7/31/2019 12:10	7/31/2019 12:45	Visible Emissions exceeded a total of 5 minutes during any 2 consecutive hours due to an upset event at NT-01 that resulted in the flaring of Waste Gas that was continually fluctuating in composition.	Steam flow was increased while continuing to maintain NHVcz compliance.
BOP-X Flare	7/31/2019 16:00	7/31/2019 16:18	Visible Emissions exceeded a total of 5 minutes during any 2 consecutive hours due to an upset event at NT-01 that resulted in the flaring of Waste Gas that was continually fluctuating in composition.	Steam flow was increased while continuing to maintain NHVcz compliance.
BOP-X Flare	12/12/2019 11:39	12/12/2019 12:09	Visible emissions exceeded a total of 5 minutes during any 2 consecutive hours due to the flare flowmeter malfunctioning, which resulted in steam controls not responding.	Steam flow was manually increased.

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Attachment A
Fenceline Monitoring Data

			Sampler Name	BOP-1	BOP-2	BOP-3	BOP-4	BOP-5	BOP-6	BOP-7	BOP-8	BOP-9	BOP-10	BOP-11	BOP-12	BOP-13	BOP-14	BOP-15
			Sampler Latitude	29.76263	29.75991	29.75701	29.75590	29.75313	29.75195	29.75023	29.75254	29.75486	29.75557	29.75798	29.75968	29.76146	29.76266	29.76258
			Sampler Longitude	-95.01518	-95.01736	-95.01798	-95.01812	-95.01505	-95.01292	-95.01098	-95.00864	-95.00708	-95.00531	-95.00287	-95.00374	-95.00568	-95.00840	-95.01228
Date of Retrieval	Time of Retrieval	Temperature (ºC)	Barometric Pressure (hPA)	Benzene Sample Results (ug/m3)														
7/8/2019	10:41	27.2	1016.9	1.6	2.1	2.1	2.0	2.2	1.8	1.3	1.2	1.2	1.2	1.0	1.0	1.0	1.0	1.2
7/22/2019	10:23	29.9	1013.3	2.9	3.0	3.2	3.4	6.2	3.7	1.8	1.3	1.4	1.3	1.2	1.1	1.0	1.0	1.5
8/5/2019	12:58	28.4	1016.3	2.1	2.4	3.0	2.9	3.9	4.5	1.7	1.5	2.3	1.5	1.2	1.1	1.3	1.2	1.8
8/19/2019	10:13	31.1	1013.5	2.9	3.9	5.8	4.2	7.3	8.1	3.5	2.2	2.3	1.9	1.5	1.8	2.5	1.9	2.0
9/2/2019	12:12	28.9	1014.1	1.9	3.4	6.0	4.3	7.1	5.3	2.1	1.6	1.5	1.2	1.0	1.0	1.1	1.0	1.4
9/16/2019	11:03	29.2	1016.4	1.2	2.2	7.3	3.4	5.5	42.0	1.4	1.3	1.6	1.1	0.8	0.9	0.9	0.9	1.2
9/30/2019	10:50	26.8	1013.8	1.1	2.2	4.4	2.1	7.8	20.0	1.1	1.1	1.2	1.0	0.6	0.6	0.7	0.5	1.0
10/14/2019	13:15	24.7	1015.8	1.1	2.1	6.9	3.0	2.1	4.2	1.3	1.1	1.5	1.3	5.8	0.8	0.8	0.7	1.2
10/28/2019	10:55	20.4	1013.8	1.0	1.9	11.0	3.0	2.6	3.8	1.3	1.0	1.1	1.0	1.2	1.0	1.0	0.7	0.8
11/11/2019	10:41	15.4	1021.1	1.3	2.2	13.0	3.4	2.5	2.5	1.8	1.1	1.6	1.3	1.3	0.9	1.0	0.8	1.2
11/25/2019	10:29	12.9	1019.8	1.8	2.2	3.6	2.6	2.3	2.7	1.9	1.3	1.8	1.6	1.5	1.4	1.4	1.4	1.6
12/9/2019	10:48	18.0	1017.0	1.8	2.2	5.1	2.8	2.2	2.7	1.8	1.2	1.4	1.5	1.4	1.5	1.3	1.3	1.4
12/23/2019	10:32	12.5	1021.3	1.4	1.6	7.4	3.0	1.8	2.2	2.0	1.1	1.4	1.6	1.2	1.2	1.1	1.0	1.2

Message

From: Donegan, Kieran Daniel [kieran.d.donegan@exxonmobil.com]
Sent: 2/26/2020 10:47:09 PM
To: Parrish, Robert [Parrish.Robert@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]
CC: Bremer, Bryant R [bryant.r.bremer@exxonmobil.com]; Rinaudo, Joey [john.j.rinaudo@exxonmobil.com]; Allen, Brad R [brad.r.allen@exxonmobil.com]; Henrichson, Lucinda [lucinda.henrichson@exxonmobil.com]
Subject: Baton Rouge Chemical Plant Force Majeure Notification
Attachments: Baton Rouge Chemical Plant Flare CD Force Majeure Notification.pdf

Good Afternoon,

Pursuant to Paragraphs 88-89 of the Consent Decree (CD) between the United States and Exxon Mobil Corporation and ExxonMobil Oil Corporation, No. 17-cv-3302 (S.D. Tex.), entered on June 6, 2018, this letter (attached) provides notice that a Force Majeure event, as defined in CD Paragraph 88, has occurred as a result of the Baton Rouge Refinery (BRRF) experiencing an unanticipated combustion incident. This force majeure event has impacted the ability of the ExxonMobil Baton Rouge Chemical Plant (BRCP) to comply with various provisions of the CD.

Thanks,

Kieran Donegan, MBA, CSP
Infrastructure Environmental Coordinator

ExxonMobil Baton Rouge Complex
4045 Scenic Highway
Baton Rouge, LA 70805
Phone: (225) 540-1316
Work Cell: (225) 364-5441
Personal Cell: (504) 495-7938
Fax: (225) 977-1013
RMO 4038
Core Strengths MVS: **RED-GREEN** | **Performance-Process** | *Conflict:* **R-G-B**

Message

From: Bowman, Meagan D [meagan.d.bowman@exxonmobil.com]
Sent: 5/8/2020 10:42:02 PM
To: eescdcopy.enrd@usdoj.gov; Parrish, Robert [Parrish.Robert@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: ExxonMobil Baytown Olefins Plant - Update 1 to Potential Force Majeure Event as a Result of COVID-19
Attachments: 20200507 EM BOP EPA CD Force Majeure Update 1 - COVID19 (No. 4 17-cv-3302).pdf

Pursuant to Paragraphs 88-89 of the Consent Decree between the United States, et al. and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, No. 4:17-cv-3302 (S.D. Tex.), attached please find Update 1 to the Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Olefins Plant.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
5000 Bayway Drive, CAB W-121a
Baytown, Texas 77520
Lync: 346.259.2345
Mobile: 281.917.5014
Fax: 346.259.5788

From: Bowman, Meagan D
Sent: Wednesday, April 8, 2020 5:34 PM
To: 'eescdcopy.enrd@usdoj.gov' <eescdcopy.enrd@usdoj.gov>; 'parrish.robert@epa.gov' <parrish.robert@epa.gov>; 'foley.patrick@epa.gov' <foley.patrick@epa.gov>; 'osbourne.margaret@epa.gov' <osbourne.margaret@epa.gov>
Subject: ExxonMobil Baytown Olefins Plant - Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19

Pursuant to Paragraphs 88-89 of the Consent Decree between the United States, et al. and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, No. 4:17-cv-3302 (S.D. Tex.), attached please find a Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19 for the ExxonMobil Baytown Olefins Plant.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
5000 Bayway Drive, CAB W-121a
Baytown, Texas 77520
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Mobile: 281.917.5014
Fax: 346.259.5788

Exxon Mobil Corporation
3525 Decker Drive
Baytown, Texas 77520

ExxonMobil

May 7, 2020

Director, Air Enforcement Division
Office of Civil Enforcement
U.S. Environmental Protection Agency
Mail Code 2242-A
1200 Pennsylvania Ave., N.W.
William Jefferson Clinton Building
Room 1119
Washington, DC 20460-0001
CERTIFIED MAIL NO. 7019 1120 0001 9502 5588
RETURN RECEIPT REQUESTED

Re: Update 1 to Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Olefins Plant

Dear Sirs and Madams:

Pursuant to Paragraphs 88-89 of the Consent Decree ("CD") between the United States, et.al. and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, No. 4:17-cv-3302 (S.D. Tex.), entered on June 6, 2018, the ExxonMobil Baytown Olefins Plant submitted notification dated April 8, 2020, that a Force Majeure event (as defined in Paragraph 88 of the CD) may potentially occur as a result of the global pandemic outbreak of Coronavirus Disease 2019 ("COVID-19").

In subsequent correspondence and communications, EPA has acknowledged receipt of notifications from other ExxonMobil sites and also acknowledged that potential impacts could result from COVID-19, but reserved judgment on Force Majeure claims until specific impacts to regulatory obligations were incurred. EPA also requested periodic updates (e.g., 30-day follow-ups) and additional notifications if sites identify compliance issues due to COVID-19 impacts.

ExxonMobil continues to take diligent and prudent actions to protect the health and safety of its workers, the public and the environment, and to meet market needs as the COVID-19 pandemic continues. As of the date of this letter, no potential compliance issues have arisen since our initial notification, and more importantly, the ExxonMobil Baytown Olefins Plant has been able to successfully meet its regulatory obligations under the CD. While there are promising developments in the global COVID-19 pandemic response, the situation remains quite fluid. ExxonMobil is faced with unprecedented challenges and constraints in refining, fuel, and chemical supply and demand chains, as well as personnel restrictive measures (e.g., stay at home orders, travel restrictions, illness, and precautionary exposure protection measures). As such, ExxonMobil still considers the potential Force Majeure an on-going situation and the initial notification still active.

ExxonMobil will continue to provide follow-up communications, as needed, if potential compliance issues are identified. Should you have any questions or concerns regarding this submittal, please contact Meagan Bowman at (346) 259-2345 or meagan.d.bowman@exxonmobil.com.

Sincerely,

Robert Hill
Baytown Olefins Plant SSHE Manager

cc:
Associate Director
Air, Toxics, and Inspections Coordination
Branch (6 EN-A)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270
CERTIFIED MAIL NO. 7019 1120 0001 9502 5595
RETURN RECEIPT REQUESTED

EES Case Management Unit
Environmental and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044-7611
CERTIFIED MAIL NO. 7019 1120 0001 9502 5601
RETURN RECEIPT REQUESTED

Andrew A. Bobb
Assistant U.S. Attorney
United States Attorney's Office for the Southern District of Texas
1000 Louisiana St., Suite 2300
Houston, TX 77002
CERTIFIED MAIL NO. 7019 1120 0001 9502 5618
RETURN RECEIPT REQUESTED

Director, Air Enforcement Division
Office of Regulatory Enforcement
c/o Matrix New World Engineering, Inc.
26 Columbia Turnpike
Florham Park, NJ 07932
CERTIFIED MAIL NO. 7019 1120 0001 9502 5625
RETURN RECEIPT REQUESTED

Mr. Andrew Wheeler
Environmental Protection Agency Administrator
EPA Administrator Mail Code 1101A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 1120 0001 9502 5632
RETURN RECEIPT REQUESTED

Mr. Lawrence Starfield
Environmental Protection Agency Principal Deputy Assistant Administrator
EPA Administrator Mail Code 2201A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 1120 0001 9502 5649
RETURN RECEIPT REQUESTED

Mr. David Ross
Environmental Protection Agency Acting Assistant Administrator
EPA Office of Water, Mail Code 4101A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 1120 0001 9502 5656
RETURN RECEIPT REQUESTED

Mr. Ken McQueen
Environmental Protection Agency Region 6 Regional Administrator
1201 Elm Street, Suite 500
Dallas, TX 75270
CERTIFIED MAIL NO. 7019 1120 0001 9502 5663
RETURN RECEIPT REQUESTED

Mr. Toby Baker
Executive Director
Texas Commission on Environmental Quality
P.O. Box 13087, MC-109
Austin, TX 78711-3087
CERTIFIED MAIL NO. 7019 1120 0001 9502 5670
RETURN RECEIPT REQUESTED

ED_004791B_00000220-00003

Ms. Nicole Bealle
Regional Director
Texas Commission on Environmental Quality Region 12
5425 Polk Street, Suite H
Houston, TX 77023-1452
CERTIFIED MAIL NO. 7019 1120 0001 9502 5687
RETURN RECEIPT REQUESTED

Electronic copies via e-mail to: *eescdcopy.enrd@usdoj.gov*
parrish.robert@epa.gov
foley.patrick@epa.gov
osbourne.margaret@epa.gov

ED_004791B_00000220-00004

Message

From: Bowman, Meagan D [meagan.d.bowman@exxonmobil.com]
Sent: 5/8/2020 10:39:18 PM
To: eescdcopy.enrd@usdoj.gov; Parrish, Robert [Parrish.Robert@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: ExxonMobil Baytown Chemical Plant - Update 1 to Potential Force Majeure Event as a Result of COVID-19
Attachments: 20200507 EM BTCP EPA CD Force Majeure Update 1 - COVID19 (No. 4 17-cv-33....pdf

Pursuant to Paragraphs 88-89 of the Consent Decree between the United States, et.al. and Exxon Mobil Corporation ("ExxonMobil") and ExxonMobil Oil Corporation, No. 4:17-cv-3302 (S.D. Tex.), attached please find Update 1 to the Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Chemical Plant.

Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
5000 Bayway Drive, CAB W-121a
Baytown, Texas 77520
Lync: 346.259.2345
Mobile: 281.917.5014
Fax: 346.259.5788

From: Bowman, Meagan D
Sent: Wednesday, April 8, 2020 5:33 PM
To: 'eescdcopy.enrd@usdoj.gov' <eescdcopy.enrd@usdoj.gov>; 'parrish.robert@epa.gov' <parrish.robert@epa.gov>; 'foley.patrick@epa.gov' <foley.patrick@epa.gov>; 'osbourne.margaret@epa.gov' <osbourne.margaret@epa.gov>
Subject: ExxonMobil Baytown Chemical Plant - Notification of Potential Force Majeure Event and Request for Potential Enforcement Discretion as a Result of COVID-19

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Meagan D. Bowman
SSHE Dept., Env. Section Supervisor
Air Regulatory and Title V Compliance

Baytown Complex
5000 Bayway Drive, CAB W-121a
Baytown, Texas 77520
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Exxon Mobil Corporation
5000 Bayway Drive
P.O. Box 4004
Baytown, Texas 77522-4004

ExxonMobil

May 7, 2020

Director, Air Enforcement Division
Office of Civil Enforcement
U.S. Environmental Protection Agency
Mail Code 2242-A
1200 Pennsylvania Ave., N.W.
William Jefferson Clinton Building
Room 1119
Washington, DC 20460-0001
CERTIFIED MAIL NO. 7019 1120 0001 9502 4494
RETURN RECEIPT REQUESTED

Re: Update 1 to Potential Force Majeure Event as a Result of COVID-19 for the ExxonMobil Baytown Chemical Plant

Dear Sirs and Madams:

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Sincerely,

Jeffrey K. Kovacs, P.E.
Baytown Complex SSHE Manager

cc:
Associate Director
Air, Toxics, and Inspections Coordination
Branch (6 EN-A)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270
CERTIFIED MAIL NO. 7019 1120 0001 9502 5007
RETURN RECEIPT REQUESTED

EES Case Management Unit
Environmental and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044-7611
CERTIFIED MAIL NO. 7019 1120 0001 9502 5403
RETURN RECEIPT REQUESTED

Andrew A. Bobb
Assistant U.S. Attorney
United States Attorney's Office for the Southern District of Texas
1000 Louisiana St., Suite 2300
Houston, TX 77002
CERTIFIED MAIL NO. 7019 1120 0001 9502 5410
RETURN RECEIPT REQUESTED

Director, Air Enforcement Division
Office of Regulatory Enforcement
c/o Matrix New World Engineering, Inc.
26 Columbia Turnpike
Florham Park, NJ 07932
CERTIFIED MAIL NO. 7019 1120 0001 9502 5427
RETURN RECEIPT REQUESTED

Mr. Andrew Wheeler
Environmental Protection Agency Administrator
EPA Administrator Mail Code 1101A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 1120 0001 9502 5434
RETURN RECEIPT REQUESTED

Mr. Lawrence Starfield
Environmental Protection Agency Principal Deputy Assistant Administrator
EPA Administrator Mail Code 2201A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 1120 0001 9502 5441
RETURN RECEIPT REQUESTED

Mr. David Ross
Environmental Protection Agency Acting Assistant Administrator
EPA Office of Water, Mail Code 4101A
1200 Pennsylvania Ave, N. W.
Washington, DC 20460
CERTIFIED MAIL NO. 7019 1120 0001 9502 5694
RETURN RECEIPT REQUESTED

Mr. Ken McQueen
Environmental Protection Agency Region 6 Regional Administrator
1201 Elm Street, Suite 500
Dallas, TX 75270
CERTIFIED MAIL NO. 7019 1120 0001 9502 5458
RETURN RECEIPT REQUESTED

Mr. Toby Baker
Executive Director
Texas Commission on Environmental Quality
P.O. Box 13087, MC-109
Austin, TX 78711-3087
CERTIFIED MAIL NO. 7019 1120 0001 9502 5465
RETURN RECEIPT REQUESTED

Ms. Nicole Bealle
Regional Director
Texas Commission on Environmental Quality Region 12
5425 Polk Street, Suite H
Houston, TX 77023-1452
CERTIFIED MAIL NO. 7019 1120 0001 9502 5472
RETURN RECEIPT REQUESTED

Electronic copies via e-mail to: *eescdcopy.enrd@usdoj.gov*
parrish.robert@epa.gov
foley.patrick@epa.gov
osbourne.margaret@epa.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF WATER

MEMORANDUM

SUBJECT: COVID-19 Related Disposal of Surplus Milk

FROM: Anna Wildeman
Principal Deputy Assistant Administrator

ANNA WILDEMAN Digitally signed by ANNA WILDEMAN Date: 2020.05.06 14:06:15 -04'00'

TO: Regional Administrators, Region 1-10

Due to the COVID-19 national health emergency, there are bottlenecks at various points in supply and distribution chains for fluid and other dairy products. While continuing their efforts to feed the nation, dairies and dairy co-ops are attempting to address the short-term oversupply challenges by redistributing milk to the extent possible and reducing milk production. However, in some situations, there may be more milk being generated than these chains can manage. As a result, there is excess milk at many dairies that may need to be disposed of on-site or off-site. There are also some instances where milk has been transported from dairies but cannot be off-loaded at creameries or other receiving stations.

The Administration is actively providing information and resources to support producers and processers through these challenging times. In April, the U.S. Department of Agriculture announced $16 billion in direct support to farmers and ranchers and a new $3 billion program for perishable food products to be purchased and distributed to those in need. More information on these programs is available here.

Additionally, several states have developed guidance, listed below, that may help producers, processors and third-party haulers address product management challenges while adhering to applicable regulatory requirements. As a reminder, milk and related products should not be discharged into waters of the United States without a permit or into any waterbody or groundwater where such discharges are prohibited under state law.

The EPA recommends that dairies take appropriate measures to hold excess milk in containment systems, waste storage facilities and/or land dispose of milk as appropriate, in accordance with nutrient management planning and other conservation practices. For dairies subject to Clean Water Act permitting, including concentrated animal feeding operations (CAFOs), such measures are addressed in the applicable National Pollutant Discharge Elimination System (NPDES) permit. Milk may be land-applied as process wastewater, so long as it is done in accordance with the CAFO's Nutrient Management Plan. Other dairies, processors, third-party haulers, and related industry partners should check appropriate state and local regulations for additional guidance.

As described in EPA's March 26, 2020 temporary enforcement policy, EPA expects all regulated entities to continue to manage and operate their facilities in a manner that is safe and that protects the public and the environment. In all cases, including the dairy industry, facilities that are subject to

NPDES permitting should make every effort to assure that they comply with the conditions of the permit. For noncompliance that occurs while the temporary enforcement policy is in effect, and that results from the COVID-19 national health emergency, the EPA's March 26, 2020 enforcement policy may apply in lieu of an otherwise applicable EPA enforcement response policy. However, any enforcement discretion for unpermitted discharges or discharges that exceed permit limits would be determined on a case-by-case basis. In addition, facilities should contact the appropriate implementing authority (EPA region, authorized state, or tribe) if facility operations impacted by the COVID-19 national health emergency may create an acute risk or an imminent threat to human health or the environment.

For additional information, please visit the EPA's websites at www.epa.gov/npdes/animal-feeding-operations-afos and www.epa.gov/coronavirus or contact your EPA regional or applicable state NPDES program contact. Additional guidance and information regarding excess milk disposal can be found at the following websites:

- The Wisconsin Department of Agriculture, Trade and Consumer Protection and the Wisconsin Department of Natural Resources have developed Emergency Disposal of Milk for Dairy Farms During the COVID-19 Public Health Emergency, the COVID-19 Toolkit, and guidance on Emergency Disposal of Milk and Processed Milk Products from Dairy Processing Facilities. The University of Wisconsin has developed presentation materials and a fact sheet on Considerations when landspreading milk or manure/milk mixtures.
- The Central Valley Regional Water Quality Board of California has also provided guidance to dairy owners and operators on Emergency Disposal of Waste Milk.
- The New York State Department of Agricultural Markets, in partnership with the New York State Department of Environmental Conservation and Cornell University, issued Provision Guidance: Using Surplus Milk as Fertilizer Due to the COVID-19 Emergency.
- The Michigan Department of Agriculture and Rural Development has issued Guidance for Emergency Management of Raw Milk.
- The Texas Council on Environmental Quality has developed the COVID-19 and Milk Disposal Q&A.

cc: Regional Water Division Directors
Regional Ag Advisors

Message

From: Walker, Sara M [sara.walker@gdit.com]
Sent: 4/15/2020 7:07:21 PM
Subject: Larry Starfield to talk on tomorrow's ICOP
Attachments: ICOP-April 16 2020-DraftAgenda_final-v4.docx

This email is being sent at the request of Mark Howard, OEM.

From: Carbone, Chad <Carbone.Chad@epa.gov>
Sent: Wednesday, April 15, 2020 1:55 PM
To: Inspectors <Inspectors@epa.gov>; Inspectors Supervisors <Inspectors_Supervisors@epa.gov>
Subject: Larry Starfield to talk on tomorrow's ICOP

Inspectors and Inspector Supervisors,

I want to let you know that Larry Starfield, OECA's Principal Deputy Assistant Administrator, will be joining tomorrow's Inspector Community of Practice (ICOP) webinar to discuss some brand new guidance for the enforcement and compliance program that is expected to come out within the next few days. The guidance deals with new requirements and expectations for off-site compliance monitoring activities and revisions to the COVID-19 Inspection Guidelines. The guidance has not yet been released across the Agency, so I encourage you to participate in the webinar and be among the first to know about it. By participating, you will also have the opportunity to ask Larry any questions you may have.

In addition to the new guidance mentioned above, we will be demonstrating the new tool for posting inspection reports to ECHO and share the current thinking on the tool's national rollout. NEIC will also be talking about its annual call for proposals and how to be successful in that process.

Last, you'll note in the first section of the attached draft agenda that there have been several new policies, guidance and memos that have come out in just the past two months. This trend in likely to continue because there are a number of new initiatives ramping up while we try to adjust to the current COVID-19 situation. We will continue to use the ICOP forum and our group email lists to keep you informed of these types of developments. As such, it important that we keep our lists of inspectors and inspector supervisors up to date. If you know of any inspectors or inspector supervisors who are not currently captured in these group lists, please let us know.

Thank you and I hope you can join tomorrow's webinar.

Chad

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Message

From: Walker, Sara M [Sara.Walker@csra.com]
Sent: 2/18/2020 1:31:32 PM
To: Sara Walker [Sara.Walker@csra.com]
Subject: On-Site Civil Inspection Procedures Rule

From: Bodine, Susan <bodine.susan@epa.gov>
Sent: Friday, February 07, 2020 9:06 AM
Subject: On-Site Civil Inspection Procedures Rule

Colleagues:

On February 6, 2020, Administrator Wheeler signed the On-Site Civil Inspection Procedures Rule. EPA is promulgating this procedural rule to fulfill the objectives outlined in the October 9, 2019 Executive Order (EO) 13892, Promoting the Rule of Law Through Transparency and Fairness in Civil Administrative Enforcement and Adjudication. The rule describes certain Agency procedures for conducting on-site civil inspections and will help ensure consistency in the application of those procedures. The rule applies to on-site civil inspections of regulated parties conducted by federally credentialed EPA civil inspectors, federally credentialed contractors, and Senior Environmental Employment employees conducting inspections on behalf of EPA. The rule does not apply to federally credentialed state and tribal inspectors conducting inspections on behalf of EPA. The procedures in the rule cover facility notification, access to a facility, opening conference, physical inspection, and closing conference. The rule also requires an inspection report to be written and provided to the facility.

Inspectors should already be practicing these procedures under our existing field guidelines. To help promote awareness of the requirements of this rule and answer any questions, OECA will be offering two webinars. The first will be on February 25th at 12:00 EDT and the second on February 26th at 12:00 EDT. Calendar invites will be sent out soon to all federally credentialed inspectors and all supervisors of those inspectors.

An advance copy of the rule was published on EPA's website at https://www.epa.gov/compliance/site-civil-inspection-procedures-rule. For any questions or additional information regarding this rule, please contact Chad Carbone at 202-564-2523.

Susan

Susan Parker Bodine
Assistant Administrator
Office of Enforcement and Compliance Assurance
202-564-2440

Message

From: Russo, Todd [Russo.Todd@epa.gov]
Sent: 3/30/2020 6:00:18 PM
To: McNabb, Ryan [Ryan_McNabb@kindermorgan.com]; Lusky, Katy [Lusky.Kathleen@epa.gov]
CC: Dressler, Jason [Dressler.Jason@epa.gov]; Groendyke, Todd [Groendyke.Todd@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]
Subject: RE: Submittal of Title V reports Electronically

Mr. McNabb,

Steve Thompson is an air enforcement manager in EPA Region 6 who can provide you with more information. I've copied him on this email and his phone number is 214-665-2769 .

Regards,

Todd Russo
Chief, Air Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. EPA Region 4
Tel: (404) 562-9194

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From: McNabb, Ryan <Ryan_McNabb@kindermorgan.com>
Sent: Monday, March 30, 2020 1:16 PM
To: Lusky, Katy <Lusky.Kathleen@epa.gov>
Cc: Russo, Todd <Russo.Todd@epa.gov>; Dressler, Jason <Dressler.Jason@epa.gov>; Groendyke, Todd <Groendyke.Todd@epa.gov>
Subject: RE: Submittal of Title V reports Electronically

Thank you Katy. Such a quick response and greatly appreciated.

Ryan

KINDER MORGAN

Ryan McNabb, CSP
Senior Specialist – Permitting & Compliance
Kinder Morgan
2200 Blount Rd.
Baton Rouge, LA 70807
Office (225) 778-2349

From: Lusky, Katy <Lusky.Kathleen@epa.gov>
Sent: Monday, March 30, 2020 11:57 AM

To: McNabb, Ryan <Ryan_McNabb@kindermorgan.com>
Cc: Russo, Todd <Russo.Todd@epa.gov>; Dressler, Jason <Dressler.Jason@epa.gov>; Groendyke, Todd <Groendyke.Todd@epa.gov>
Subject: RE: Submittal of Title V reports Electronically

[This email message was received from the Internet and came from outside of Kinder Morgan]

HI Ryan,

I believe Todd Russo, chief of the Air Enforcement Branch here in Region 4, may be able to help point you in the right direction. Louisiana is in Region 6 and I am not sure who the Region 6 contacts are over there who normally receive the Title V reports.

Thanks,
Katy

Katy R. Lusky
Acting Chief
Air Analysis and Support Branch
404-562-9130

From: McNabb, Ryan <Ryan_McNabb@kindermorgan.com>
Sent: Monday, March 30, 2020 12:26 PM
To: Lusky, Katy <Lusky.Kathleen@epa.gov>
Subject: Submittal of Title V reports Electronically

Kathleen,
I see that due to the Covid situation, the EPA is going to allow Title V reports to be submitted electronically. I have a site in Louisiana. Can you tell me where we should email these reports to, or point me in the right direction?

Thank you very much for your help.

Ryan

KINDER MORGAN

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