# **2018 Coal Combustion Residuals Annual Inspection**

# **Hunter Power Plant**

**Hunter CCR Landfill** 



Prepared for
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FINAL December 11, 2018



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# **Appendices**

Appendix A Photograph Log

Appendix B Annual Inspection Report Form

#### 1 Findings

This annual inspection and report are being completed for the purpose of providing due diligence by PacifiCorp to ensure the safety of its coal combustion residual (CCR) facilities. The inspection was performed according to the requirements for annual inspections under Section 257.84 (for CCR landfills) of 40 CFR Parts 257 and 261, Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities, Final Rule, dated April 17, 2015 [1].

AECOM observed no signs, such as slumps, tension cracks or other movements that would indicate imminent failure of the embankment for the Hunter Power Plant CCR Landfill. Figure 1-1 on the following page is an aerial photograph of the landfill.

The CCR requirement for signage is not applicable to landfills. They are only required for surface water impoundments. The Hunter CCR Landfill does not accept hazardous wastes.

Maintenance items from the 2018 inspection include:

- Obstruction of culverts in the perimeter drainage ditches at south haul road crossing and north
  access road. The obstructions in culverts are the result of eroded sediment similar to the condition
  observed in the 2016 and 2017 inspection reports [2], [3]. Refer to photos 28, 29, 33, and 34
  Appendix A. These obstructions were addressed in recent maintenance and have been cleared since
  the inspection was completed.
- Partial obstruction of inlet culvert at the south end of the retention basin located east of the CCR Landfill. The obstruction is composed of eroded sediment at the downstream end of the culvert.
   Refer to photo 16, Appendix A. Obstruction of this culvert was addressed in recent maintenance and has been cleared since the inspection was completed.

Observations from the 2018 inspection include:

- 1. Observation of minor erosion rills and shallow gullies. Refer to photos 10, Appendix A. These rills and gullies are typical of the exterior slopes of the landfill and have not changed significantly since the 2017 inspection.
- 2. Additional segments of the exterior slopes have partially been covered with straw. Vegetation continues to improve on straw-covered slopes observed in the 2016 and 2017 inspections. Refer to photos 6, 9, 10, and 12, Appendix A.

All of the photos in the Photograph Log (Appendix A) show landfill conditions as basis for comparison when performing future inspections.

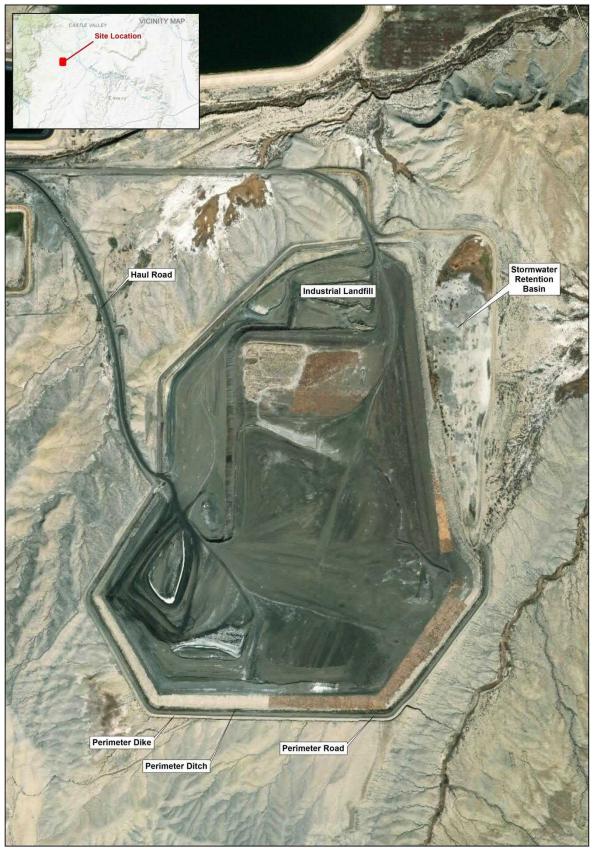


Figure 1-1. Hunter Power Plant CCR Landfill (ESRI and Digital Globe; November 2016)

# 2 Description and History of CCR Landfill

#### 2.1 General Overview

The Hunter Power Plant is operated and majority-owned by PacifiCorp. The Hunter CCR Landfill is situated about one mile southeast of the plant.

Flue-gas desulfurization (FGD) scrubber waste, fly ash, and bottom ash produced by the plant are disposed of in the CCR Landfill [4]. These waste materials are delivered to the landfill by truck by way of a haul road entering the CCR Landfill from the west. In addition, a small area at the north end of the CCR Landfill has been designated and permitted as a Class IIIb industrial waste landfill [5], [6].

#### 2.2 Location

The Hunter Power Plant is located in Emery County, Utah, approximately 2.5 miles south of Castle Dale, Utah. Access to the plant is provided by Utah Highway 10 (UT-10). See the vicinity map on Figure 1-1 for the site location.

#### 2.3 Hunter Landfill Description

This study specifically addresses the CCR waste storage facility identified as the Hunter CCR Landfill (also known as Ash Landfill), which includes the Industrial Waste Landfill. An aerial map showing the location of the CCR Landfill and the location of the Industrial Waste Landfill within the perimeter of the CCR Landfill is shown in Figure 1-1.

Runoff from the Hunter CCR Landfill is directed to an unlined, zero-discharge retention basin located east of the landfill (see Figure 1-1). Water is held in the retention basin and evaporated. Although there are outlets to release water from the basin, they are not used. There is no evidence of water discharging from the basin.

A summary of pertinent data for the Hunter CCR Landfill at the Hunter Power Plant is provided in Table 2-1.

 Facility

 CCR Landfill

 Approximate Current Area (acres)
 290¹

 Length (feet)
 4,800 [7]

 Width (feet)
 3,600 [7]

 Maximum Elevation at Completion (feet amsl)
 5,810 [8]

 Slopes (H:V)
 4:1 [5]

 Status
 Active

Table 2-1. Hunter Power Plant Landfill Pertinent Data

Notes: H = Horizontal; V = Vertical

<sup>1.</sup> Estimated by AECOM from 2017 aerial photographs.

#### 2.4 Performance History

The current 290-acre landfill is used as the sole depository of CCR material from the Hunter Power Plant. There have been no recorded incidences of embankment failure or other discharges of CCR from the Hunter Landfill.

#### 2.5 Construction History

Bottom ash, fly ash, and FGD waste is hauled by truck to the landfill. CCR in the form of fly ash and bottom ash is spread and compacted to approximately 87 pounds per cubic foot (pcf) [9] with only vehicular traffic. FGD waste is dumped throughout the landfill, but tends to be concentrated at the interior of the landfill.

#### 2.6 Review of Operating Record Files

The list of operating records to be reviewed during the annual inspection as contained in 40 CFR §257, Disposal of Coal Combustion Residuals for Electric Utilities is "CCR unit design and construction information required by §§257.73(c)(1) and 257.74(c)(1), previous periodic structural stability assessments required under §§257.73(d) and 257.74(d), the results of inspections by a qualified person, and results of previous annual inspections" [1]. The following subsections describe the review of operating record files.

#### 2.6.1 Design and Construction Information

AECOM reviewed the documents listed in Section 5. However, there are no design or construction drawings in the record files for the current geometry of the landfill. Construction of a vertical expansion of the CCR Landfill had not begun at the time of this report; however, design drawings were produced and are kept on file at the plant [8].

#### 2.6.2 Previous Periodic Structural Analyses

The Cornforth Phase 1 geotechnical study [7] was completed in 2009 and did not recommend a formal risk assessment of the landfill structure.

In 2015, URS completed a geotechnical study to evaluate the feasibility of expanding the landfill vertically [8]. The study includes geotechnical analyses assessing the stability of the landfill under the additional loading. This study concluded that it is feasible and that the landfill is stable for this expansion, provided that monitoring of internal pore pressures is performed. It also included a recommendation to relieve pore pressure in the landfill using horizontal drains. Photographs 19 and 20 of in Appendix A show some of the features associated with the underdrain system.

#### 2.6.3 Results of Inspection by a Qualified Person

The Hunter CCR Landfill is subject to periodic inspections by the Hunter Power Plant staff. AECOM reviewed inspection reports and did not find anything that would affect the safety of the landfill. These inspections are documented and retained by PacifiCorp. In the opinion of this report's author, the interim inspections by the plant staff are adequate and appropriate for this CCR unit.

#### 2.6.4 Results of Previous Annual Inspections

The first annual inspection under CCR rules [1] for the Hunter CCR Landfill was conducted in September 2015 [10]. PacifiCorp has completed other independent inspections by third parties [11], [7]. None of the observations from this or previous inspections indicated imminent safety concerns.

This report and other pertinent reports and data are accessible at the following website:

http://www.berkshirehathawayenergyco.com/ccr/ppw.html

Section 5 of this report is a list of references for the Hunter Landfill.

#### 3 Field Inspection of Hunter Landfill

A field inspection was conducted on September 13, 2018, by AECOM staff, Bryan Franke, P.E., and Braden Error. Mr. Franke participated previously in the CCR impoundment inspections in 2014 for Hunter CCR Landfill [11], and a subsequent periodic annual inspection [3] under the CCR rule.

A photo log documenting features and their condition at the time of the inspection is presented in Appendix A. These photos are referenced in this report.

The completed Annual Inspection Report Form is presented in Appendix B. This checklist should be considered an integral part of this report and remain attached whenever the report is forwarded or otherwise reproduced.

#### 3.1 General

The field inspection was performed by the AECOM inspectors by driving the perimeter road and the crest, stopping at approximately ¼-mile intervals or when observations warranted stopping. Intermittently, photos of the outer face of the embankment provide a baseline for future inspections (Appendix A).

Features and conditions were documented on the Annual Inspection Report form (Appendix B) and were photographed. The approximate locations of the photos are detailed in the inspection photograph log overview map located at the beginning of the Photograph Log, Appendix A. In addition to documenting current features, the photo log of existing conditions is intended on aiding future inspections.

#### 3.2 Hunter Landfill Geometry

Figure 3-1 shows a cross section of the embankment slope on the south face of the landfill. This section is found in the Industrial Landfill Renewal Application, June 27, 2006, Plan Sheet 3 [5] and is typical of the other landfill faces. The slopes are a maximum of 4 horizontal to 1 vertical.

The landfill has both a perimeter road and a perimeter drainage ditch at the toe of the landfill slope. On the south side of the landfill, there is a drainage berm and diversion ditch outside the perimeter road to prevent off-site runoff from discharging to the road or the perimeter ditch.

The plant received a permit to dispose of and store industrial waste in two designated portions of the CCR Landfill [5], [6], [12]. The primary location was in the north-central portion of the embankment with an area of 6.2 acres [13]. The secondary location, where the industrial waste is disposed of at present, is located near the north boundary of the CCR embankment with an area of 9.8 acres.

#### 3.3 Instrumentation

There is currently no permanent instrumentation within the landfill itself. Landfill instrumentation is not required by the CCR rule.

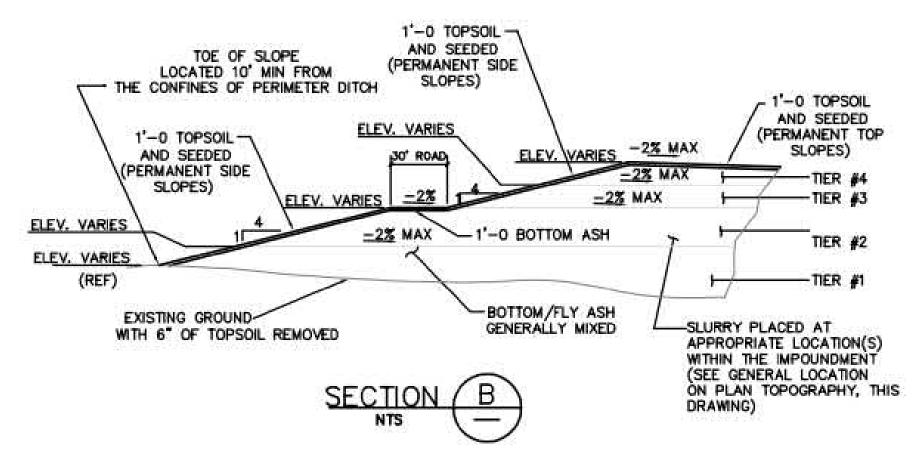


Figure 3-1. Section of South Face of Hunter Landfill [5]

#### 3.4 Volume of CCR

AECOM estimated the current volume of CCR stored in the landfill in 2018 at approximately 15.3 million cubic yards. This was based on the estimate of 12.6 million cubic yards [8] in 2014 plus 1.2 million additional cubic yards reported as being added in 2015 and 2016<sup>1</sup>, 0.8 million cubic yards reported as being added in 2016 and 2017, and an estimated 0.65 million cubic yards added in 2018.

#### 3.5 Observed or Potential Structural Weaknesses

There were no appearances of actual or potential structural weakness or existing conditions that are disrupting, or have the potential to disrupt the operation and safety of the CCR unit.

#### 3.6 Observed Changes

There were no observable changes in the structure of the CCR Landfill's embankments. Locations were chosen along the embankments to document this year compared to 2017. These locations are marked on the overview map in Appendix A and should be monitored in any further inspection for change.

Following are 2018 observations:

- Obstruction of culverts in the perimeter drainage ditches at south haul road crossing and north access road. The obstructions in culverts are the result of eroded sediment similar to the condition observed in the 2016 and 2017 inspection reports [2], [3]. Refer to photos 28, 29, 33, and 34 Appendix A. These obstructions were addressed in recent maintenance and have been cleared since the inspection was completed.
- 2. Partial obstruction of inlet culvert at the south end of the retention basin located east of the CCR Landfill. The obstruction is composed of eroded sediment at the downstream end of the culvert. Refer to photo 16, Appendix A. Obstruction of this culvert was addressed in recent maintenance and has been cleared since the inspection was completed.
- 3. Observation of minor erosion rills and shallow gullies. Refer to photos 10, Appendix A. These rills and gullies are typical of the exterior slopes of the landfill and have not changed significantly since the 2017 inspection. These do not represent a threat to safety or the integrity of the slopes. The eroded material has been retained at the toe of the embankment and there is no potential for it to move off site. This erosion is superficial and will be covered with closure of the slopes.
- 4. Additional segments of the exterior slopes have partially been covered with straw. These segments include the south and west exterior slopes, south of the haul road, and the east exterior slopes. Vegetation continues to improve on straw-covered slopes observed in the 2016 and 2017 inspections. Refer to photos 6, 9, 10, and 12, Appendix A.

**AECOM** 

2018 Hunter CCR Landfill Inspection

<sup>&</sup>lt;sup>1</sup> Aerographics volume computation from difference in LIDAR between 2014 and 2015.

#### 4 Limitations and Consultant Qualifications

#### 4.1 Limitations

This report presents observations, and conclusions drawn from a review of pertinent documents referenced in Section 5, and a field inspection of the Hunter CCR Landfill. The field inspection was limited to the interior of the perimeter road. The purpose of the review and inspection has been to assess the safety or adequacy of the facilities against catastrophic failure of the major constructed elements during normal operations or unusual or extreme events based on visual inspection and available information. A secondary purpose is to identify any potential deficiencies related to the CCR rules [1].

The conclusions and professional opinions presented herein were developed by the independent consultant and are in accordance with generally accepted engineering principles and practices at the time and location the services were provided. AECOM makes no other warranty, either expressed or implied.

#### 4.2 Professional Engineer Qualifications

The professional engineer for this inspection is Bryan Franke. He is licensed in the State of Utah (9819797) as a geotechnical engineer. He has over 5 years' experience in geotechnical and mining engineering and has performed inspections and safety evaluations on dams, slopes, and other waste depositories.

#### 5 References

- [1] 40 CFR § 257 Disposal of Coal Combustion Residuals from Electric Utilities, April 17, 2015.
- [2] URS, "2016 Coal Combustion Residuals Annual Inspection: Hunter Power Plant Landfill," November 29, 2016.
- [3] URS, "2017 Coal Combustion Residuals Annual Inspection: Hunter Power Plant Landfill," November 30, 2017.
- [4] O'Brien & Gere, "Dam Safety Assessment of CCW Impoundments: Hunter Power Plant, Castle Dale, Utah," Washington, D.C., 2013.
- [5] Water & Environmental Technologies PC, "Industrial Landfill Permit Renewal Application: Hunter Power Plant," Salt Lake City, Utah, 2006.
- [6] Utah Division of Solid and Hazardous Waste, "Solid Waste Permit Renewal: Hunter Power Plant Class IIIb Landfill," Salt Lake City, Utah, 2007.
- [7] Cornforth Consultants Inc., "Phase I Geotechnical Assessments: Scrubber Emergency Holding Pond and FGD Cell/Ash Landfill, Hunter Power Plant," Castle Dale, Utah, 2009.
- [8] URS, "Memorandum Hunter CCR Landfill Vertical Expansion Feasibility Evaluation", February 17, 2015.
- [9] PacifiCorp Electric Operations, "Combustion Waste Embankment Expansion Project: Operations Manual," Hunter Power Plant, Castle Dale, Utah, 1997.
- [10] URS, "2015 Coal Combustion Residuals Annual Inspection: Hunter Power Plant Landfill," December 29, 2015.
- [11] URS, "2014 Coal Combustion Residuals Impoundment Inspection and Assessment Hunter Power Plant Ash Landfill, ," January 6, 2015.
- [12] Utah Division of Solid and Hazardous Waste, "Solid Waste Facility Fact Sheet: Hunter Power Plant Class IIIb Landfill," 2014. [Online]. Available: http://www.deq.utah.gov/businesses/P/PacificCorp/HunterPowerPlantClassIIIbLandfill.htm. [Accessed: 12-Nov-2014].
- [13] PacifiCorp Energy, "Thermal Generation Fact Sheets: Hunter Plant," 2011. [Online]. Available: http://www.pacificorp.com/es/thermal.html. [Accessed: 14-Nov-2014].

# Appendix A Photograph Log





Approximate Photo Point



0 150 300

600

Feet

PacifiCorp Energy Hunter Power Plant CCR Landfill Castle Dale, Utah September, 2018

**AECOM** 

# **Inspection Photographs**





Photograph No. 1 View of depression on outside edge of perimeter road south of main haul road entrance to CCR Landfill, looking south.





Photograph No. 2 View of west slope of CCR Landfill south of main haul road entrance into landfill, looking south-southwest.



Photograph No. 3 View of west slope of CCR Landfill and onsite runoff collection ditch running along the toe of the slope, looking north-northeast.





Photograph No. 4 View of interior slope of perimeter berm, looking south.





Photograph No. 5 View of interior slope of perimeter berm, looking north-northeast.





Photograph No. 6 View of southwest slope of CCR Landfill, looking east. Note hay placement on slope.





Photograph No. 7 View of offsite diversion channel diverting offsite runoff around permitted CCR Landfill, looking east.





Photograph No. 8 View of offsite drainage channel discharging into offsite diversion channel and diverted around permitted CCR Landfill, looking south.





Photograph No. 9 View of southwest slope of CCR Landfill, runoff collection ditch running along the toe of the slope, and perimeter road, looking northwest.



Photograph No. 10 View of southwest slope of CCR Landfill, looking northeast. Note erosion rills and hay placed on slope.



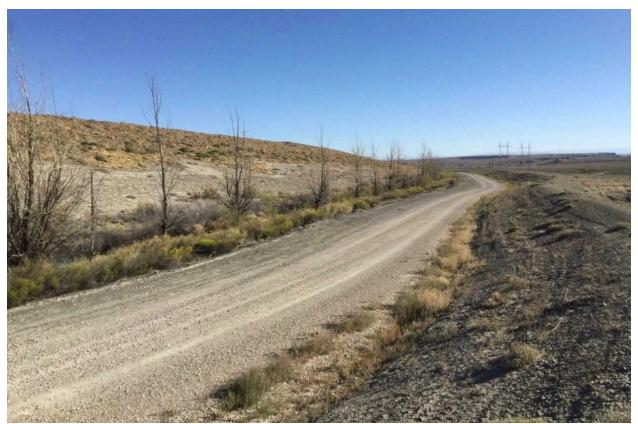


Photograph No. 11 View of interior slope of perimeter berm and perimeter road, looking west.



Photograph No. 12 View of south slope of CCR Landfill, looking west. Note hay and increased vegetation on slope.





Photograph No. 13 View of southeast slope of CCR Landfill, perimeter road, and interior slope of perimeter berm, looking northeast.



Photograph No. 14 View of southeast slope of CCR Landfill, perimeter road, and perimeter berm, looking southwest.





Photograph No. 15 View of south retention basin inlet pipe (upstream end). Pipe culvert was unobstructed and free of debris, looking west-northwest.



Photograph No. 16 View of south retention basin inlet pipe (downstream end). Pipe culvert was partially obstructed at this end at time of inspection, looking southeast.





Photograph No. 17 View of pipe culvert passing under perimeter road (downstream end), looking southeast.



Photograph No. 18 View of pipe culvert passing under perimeter road (upstream end), looking southwest.

# **Inspection Photographs**





Photograph No. 19 View of east slope of CCR Landfill and drain line from underdrains to Frac tank (see Photograph No. 20), looking south.



Photograph No. 20 View of Frac tank used for underdrain water storage, looking north-northwest.





Photograph No. 21 View of retention pond outlet and slide gate control structure (upstream end), looking east. The slide gate appeared to be in good condition.



Photograph No. 22 View of slide gate control and auxiliary outlet conduit, looking east. The slide gate control appeared to be straight and in good condition.

# **Inspection Photographs**





Photograph No. 23 View of energy dissipation structure at downstream end of retention pond outlet conduit, looking southwest. This facility is a zero-discharge facility and gate remains closed.



Photograph No. 24 View of energy dissipation structure at downstream end of retention pond outlet conduit and upstream of baffle. Note discharge conduit from auxiliary spillway.





Photograph No. 25 View of energy dissipation structure at downstream end of retention pond outlet conduit and downstream of baffle.



Photograph No. 26 View of pipe culvert (upstream end) under perimeter road through retention pond embankment. The purpose of the pipe is unclear, but has since been removed.





Photograph No. 27 View of pipe culvert (downstream end) under perimeter road through retention pond embankment. The culvert has since been removed.



Photograph No. 28 View of erosion gully above north inlet pipe (downstream end), looking approximately south-southwest. Pipe was partially obstructed, but has since been cleared.





Photograph No. 29 View of retention basin north inlet pipe (upstream end), looking east. Pipe culvert was partially obstructed, but has since been cleared.



Photograph No. 30 View of temporary north slope of CCR Landfill just west of Industrial Landfill, looking south.





Photograph No. 31 View of recently-placed CCR material near west edge of CCR Landfill.



Photograph No. 32 View of recently-placed CCR material near west edge of CCR Landfill near main haul road entrance. Note FGD material placement.





Photograph No. 33 View of pipe culvert (downstream end) under main haul road near entrance to CCR Landfill. Note rumble rack in the background. Culvert was partially obstructed by sediment, but has since been cleared.



Photograph No. 34 View of pipe culvert (upstream end) under main haul road near entrance to CCR Landfill. Culvert was partially obstructed, but has since been cleared.



# Appendix B Annual Inspection Report Form



# Report

Issue Date: 8-24-2015 Form XXXXX Revision A

Page 1 of 2

**September 13,2018** 

Date:

Feature Name: Feature ID: **Hunter CCR Landfill** 

CCR Landfill Name					Da	te	Inspected By								
Hunter CCR Landfill				09-	-13-18	Bryan Franke, P.E., & Braden Error									
Inspection Frequency: Routine Weather/Seismic Event					ent 🗌	Other:									
Type of Landfill: ☐ Active ☐ Inactive Weather Conditions: ☐ Wet ☐ Dry						Sr	Snow Cover Windy Other								
				Checks and	Obsor	vations									
	1 Dlacom	ant procedure	s are being felle		Obser	vations			Yes No NA						
	Placement procedures are being followed.     Placement procedures are being followed.											□NA □NA			
ons	Dust control logs are complete and available											<u>□INA</u> ⊠NA			
atic	Dust control logs are complete and available.      Haul road maintained and dust controlled.											□NA			
Operations					observe	od Observed grader sni	reading	g fly ash/h ash	<u> </u>	- C3 _					
Ō	Observations: FGD placed in one place; no mixing was observed. Observed grader spreading fly ash/b. ash dumped via belly dum. Water truck actively watering haul road.														
	Actions None Maintenance Monitoring Engineering Notification/Work Order#														
	□ Name				blems				Cover						
(e)	☐ None ☐ Slope Stability ☐ Settlement							Seepage		⊠Vegetation ☐Gravel					
abl	Animal durrows Settlering Settlering Settlering Settlering			CIIC		Rills		Ponding	Soil						
plic								Other		Other					
Cover (if applicable)	5. Exterior slopes in good condition, with no exposed CCR waste (non-beneficial).											]NA			
Œ,	5. Exterior slopes in good condition, with no exposed CCR waste (non-beneficial).   Observations: Cover included soil, annual vegetation, and hay; some erosion rills observed on bare soil cover (hay obstructed view of											of			
Ver	possible rills beneath). Slopes on north of landfill typically uncovered or temporary slopes. Industrial waste not exposed suggests frequent											quent			
ဒ	cover.														
	Actions	None	Maintenance	e  Monit	oring	Engineering No	+ifica+i	on/Work Order#							
	Actions		Cover												
US	None		Slope Sta		Problems				Nec						
eru	ı <b>=</b>	l burrows	Settlement			Erosion		Seepage							
<u>۔</u> 8	Animal damage					Rills		Ponding Other		Soil					
ete							ш'	Other	Oth	Other					
opes and Perimeter Berms					ervatio	ons									
Pe .	6. Slopes and berms provide positive drainage.										⊠Yes □No □NA				
anc				_	-	ss than 2 inches in diam		-		_					
es	some tension cracks visible in exterior erosion gully at the base of the perimeter berm. By main haul road, some drainage near the gravel														
Slop	perimeter road flows adjacent to road, ponds, and flows over road to main drainage ditch.														
•,	Actions	None	Maintenance	eMonit	oring	Engineering Noti	ificatio	n/Work Order#							
	Problems														
<u>s</u>	<b>.</b>		☐ Ditch Fai	lure.	Пр	ebris	Пве	rms							
ıtro	☐ None	☐ None				Sediment		Bales/Waddles		Other					
Ō				Ohs	: ervatio	ns			ı						
ent	7. Erosior	7. Erosion or sediment controls in good condition.								No	□ N	A			
Ē									∑Yes	No	□ N	A			
Sec									Yes	□No					
on	Observations: Some sediment build-up in pipe culverts; not fully obstructed, some erosional rilling above culvert that is below ind														
Erosion Sediment Controls	landfill access.														
ш															
	Actions	l lNone	Maintenance	e $\square$ Monit	oring	Engineering Noti	ificatio	n/Work Order#							



# **Annual Landfill Inspection Report**

Issue Date: 8-24-2015 Form XXXXX Revision A

Page 2 of 2

Feature Name: Feature ID: Date:
Hunter CCR Landfill September 13,2018

	Observations								
	10. Temporary covers functioning as intended.	⊠Yes							
	11. Storm water systems functioning as intended.	⊠Yes							
-	12. Any appearance of actual or potential structural weakness and other conditions which are disrupting or have the potential to disrupt the operation or safety of the CCR landfill?	☐Yes ⊠No ☐N/A							
Other	13. Other non-structural or non-emergency safety issues.	☐Yes ⊠No ☐N/A							
0	Observations:								
	Actions None Maintenance Monitoring Engineering Notification/Work Order#								
Inspector Signature Buyan Franke									
Date <u>09-13-2018</u>									