

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IX



IN THE MATTER OF:)
)
Reddy Ice LLC)
4626 S. 40th Street)
Phoenix, AZ 85040)
)
)
)
)
Respondent.)
_____)

Docket No.
CAA(112r)-09-2022-0049

CONSENT AGREEMENT
AND FINAL ORDER
40 C.F.R. §§ 22.13 and 22.18

CONSENT AGREEMENT

A. PRELIMINARY STATEMENT

1. This is a civil administrative enforcement action instituted pursuant to Sections 113(a)(3)(A) and (d) of the Clean Air Act (“CAA”), as amended, 42 U.S.C. §§ 7413(a)(3)(A) and (d), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination or Suspension of Permits (“Consolidated Rules”), 40 C.F.R. Part 22.
2. Complainant is the United States Environmental Protection Agency, Region IX (“EPA”).
3. Respondent is Reddy Ice LLC (“Respondent”).
4. The Administrator of EPA has delegated to the Regional Administrators the authority to sign consent agreements memorializing settlements of enforcement actions under the CAA. Delegation 7-6-A, dated August 4, 1994. The Regional Administrator, EPA Region IX, in turn, has re-delegated this authority to the Director of the Enforcement and Compliance Assurance Division. Regional Delegation R9-7-6-A, dated February 11, 2013. On EPA’s behalf, the Director of the Enforcement and Compliance Assurance Division is therefore delegated the authority to

settle civil administrative penalty proceedings under Section 113(d) of the CAA, 42 U.S.C. § 7413(d).

5. This Consent Agreement and Final Order (“CA/FO”), pursuant to 40 C.F.R. §§ 22.13 and 22.18, simultaneously commences and concludes this proceeding, wherein EPA alleges that Respondent violated Section 112(r) of the CAA, 42 U.S.C. § 7412(r), and its implementing regulations.

6. EPA and Respondent, having agreed that settlement of this action is in the public interest, consent to the entry of this CA/FO. Respondent agrees to comply with the terms of this CA/FO.

B. GENERAL ALLEGATIONS

7. Respondent owns and operates an ice manufacturing facility located at 4626 S. 40th Street in Phoenix, Arizona (the “Facility”). Respondent typically operates the Facility 24 hours a day, seven days a week.

8. On June 26, 2019, EPA performed an inspection of the Facility pursuant to Section 112(r) of the CAA, 42 U.S.C. § 7412(r), Sections 304-312 of the Emergency Planning and Community Right-to-Know Act (“EPCRA”), and Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9603(a). EPA provided its inspection report, and a summary of areas of concern, to Respondent on June 26, 2020. Based upon the information gathered during this inspection and subsequent investigation, EPA alleges that Respondent violated certain provisions of the CAA.

9. Respondent claims that prior to EPA’s June 26, 2019 inspection, it initiated a Risk Management Program (“RMP”) improvement project at the Facility. Respondent claims it intended to take certain actions to address some of the violations alleged in this CA/FO as part of its RMP improvement project but had not yet completed these actions at the time of EPA’s

inspection. Respondent claims to have continued making RMP improvements to the Facility during the COVID-19 pandemic, which required shutting down its ice manufacturing operations and the ammonia refrigeration system equipment associated with the ice production process.

10. At all times relevant to this CA/FO, Respondent has been a “person” as defined by Section 302(e) of the CAA, 42 U.S.C. § 7602(e).

11. At all times relevant to this CA/FO, the Facility has been a “stationary source” as defined by Sections 111(a)(3) and 112(a)(3) of the CAA, 42 U.S.C. §§ 7411(a)(3) and 7412(a)(3).

12. Respondent is subject to the powers vested in the EPA Administrator by Section 113 of the CAA, 42 U.S.C. § 7413.

13. At all times relevant to this CA/FO, Respondent was the “owner or operator” of the Facility as defined by Sections 111(a)(5) and 112(a)(9) of the CAA, 42 U.S.C. §§ 7411(a)(5) and 7412(a)(9).

14. A stationary source that has a regulated substance in an amount equal to or in excess of the applicable threshold quantity (“TQ”) in a “process” as defined by 40 C.F.R. § 68.3, is subject to the Program 3 Risk Management Plan (“RMP”) requirements. Program 3 imposes the Occupational Safety and Health Administration’s process safety management standard and requires owners or operators to develop a management system to oversee the implementation of the RMP elements.

15. Pursuant to Section 112(r)(7) of the CAA, 42 U.S.C. § 7412(r), and its implementing regulations, owners and operators of stationary sources at which a regulated substance is present in more than a TQ must prepare and implement a RMP to detect and prevent or minimize accidental releases of such substances from the stationary sources in order to protect human health and the environment.

16. Pursuant to Section 112(r) of the CAA, 42 U.S.C. § 7412(r), EPA established a TQ for each “regulated substance” at or above which a facility using such a substance in one or more processes shall be subject to the requirements of Section 112(r) of the CAA, 42 U.S.C. § 7412(r). For substances designated as “regulated toxic substances,” the TQs are specified at 40 C.F.R. § 68.130, Table 1.

17. Ammonia (anhydrous) is a “regulated toxic substance” listed under Section 112(r)(3) of the CAA, 42 U.S.C. § 7412(r)(3), with a TQ of 10,000 pounds. 42 C.F.R. § 68.130, Table 1.

18. At all times relevant to this CA/FO, Respondent was the “owner or operator” of a stationary source that has a regulated substance in an amount equal to or in excess of the applicable TQ in a “process,” as defined by 40 C.F.R. § 68.3, and is subject to the Program 3 RMP requirements.

19. Section 113 of the CAA, 42 U.S.C. § 7413, authorizes EPA to assess civil penalties for any violation of Section 112(r) of the CAA, 42 U.S.C. § 7412(r).

C. ALLEGED VIOLATIONS

COUNT I

(Failure to accurately document ventilation systems design and compliance of equipment with design codes and standards.)

20. Paragraphs 1 through 19, above, are incorporated herein by this reference as if they were set forth here in their entirety.

21. 40 C.F.R. § 68.65(d)(1) requires that owners or operators compile written process safety information pertaining to the equipment in the process, including the materials of construction, piping and instrument diagrams, electrical classification, relief system design and design basis, ventilation system design, design codes and standards employed, material and energy balances, and safety systems.

22. 40 C.F.R. § 68.65(d)(2) requires owners or operators to document that equipment complies with recognized and generally accepted good engineering practices (“RAGAGEP”).

23. 40 C.F.R. § 68.65(d)(3) requires owners and operators to determine and document that any existing equipment that deviates from RAGAGEP because it was designed or constructed in accordance with standards that are no longer in general use, is designed, maintained, inspected, tested, and operating in a safe manner.

24. On June 26, 2019, the day of EPA’s inspection, Respondent did not provide EPA with documentation of the ventilation system design in its Machinery Room 2 (“AMR 2”). Respondent did provide EPA with ventilation design system information for Machinery Room 1 (“AMR 1”) at the time of EPA’s inspection, but it was inconsistent with ventilation design system information provided following the inspection, on August 13, 2020.

25. Based on EPA’s inspection and information gathered during EPA’s investigation, EPA determined that Respondent had not adequately documented that various equipment at the Facility – including the ventilation systems in AMRs 1 and 2, entry and exit doors in AMRs 1 and 2, emergency stop and ventilation activation switches, ammonia leak detection alarm, other audible and visible alarms, and ammonia piping – complied with the corresponding RAGAGEP, pursuant to American National Standards Institute (ANSI)/International Institute of Ammonia Refrigeration (IIAR) 2-2021, or were otherwise designed, maintained, inspected, tested, and operating in a safe manner.

26. By failing to document the ventilation system design and design codes and standards employed for the equipment in the process for AMRs 1 and 2 or were otherwise designed, maintained, inspected, tested, and operating in a safe manner, Respondent violated CAA Section

112(r)(7), 42 U.S.C. § 7412(r)(7), and 40 C.F.R. §§ 68.65(d)(1)(v)-(vi), 68.65(d)(2), and 68.65(d)(3).

COUNT II

(Failure to correct mechanical integrity deficiencies in equipment before further use.)

27. Paragraphs 1 through 19, above, are incorporated herein by this reference as if they were set forth here in their entirety.

28. 40 C.F.R. § 68.67(c) requires owners or operators to address specific topics when they perform process hazard analyses (“PHAs”) for RMP processes at their facilities. Pursuant to 40 C.F.R. § 68.67(c)(3), PHAs must address engineering and administrative controls applicable to hazards and their interrelationships.

29. During a 2015 mechanical integrity audit at the Facility, Respondent identified engineering control deficiencies related to ammonia detectors, emergency exhaust fans, and dampers and alarms. When EPA conducted its inspection of the Facility on June 26, 2019, EPA determined that these 2015 mechanical integrity audit items had not been resolved. Respondent also carried out a compliance audit in 2017 in which it identified engineering control deficiencies related to the refrigeration process and ventilation system. In September 2017, Respondent prepared a PHA revalidation checklist. EPA determined that the September 2017 PHA revalidation checklist did not contain any recommendations to control hazards associated with the refrigeration process that were identified in the 2015 mechanical integrity audit and the 2017 compliance audit.

30. By failing to adequately address engineering and administrative controls applicable to hazards and their interrelationship in its September 2017 PHA revalidation checklist, Respondent violated CAA Section 112(r)(7), 42 U.S.C. § 7412(r)(7), and 40 C.F.R. § 68.67(c)(3).

COUNT III

(Failure to correct mechanical integrity deficiencies in equipment before further use.)

31. Paragraphs 1 through 19, above, are incorporated herein by this reference as if they were set forth here in their entirety.

32. 40 C.F.R. § 68.73(e) requires owners or operators to correct deficiencies in equipment that are outside acceptable limits, as defined by the process safety information in 40 C.F.R. § 68.65, before further use or in a safe and timely manner to assure safe operation.

33. Based on EPA's inspection and information gathered during EPA's investigation, EPA determined that there were mechanical integrity deficiencies outside of acceptable limits for several pieces of equipment – including ammonia piping, oil drain piping, electrical conduits, emergency stop and ventilation activation pull stations, ammonia sensors, and insulation – that should have been corrected prior to continued use.

34. By failing to comply with the mechanical integrity requirements for correcting deficiencies in equipment, Respondent violated CAA Section 112(r)(7), 42 U.S.C. § 7412(r)(7), and 40 C.F.R. § 68.73(e).

COUNT IV

(Failure to promptly determine and document responses to compliance audit findings.)

35. Paragraphs 1 through 19, above, are incorporated herein by this reference as if they were set forth here in their entirety.

36. 40 C.F.R. § 68.79(d) requires owners or operators to promptly determine and document appropriate responses to findings of compliance audits and document that deficiencies have been corrected.

37. Based on EPA's inspection and information gathered during EPA's investigation, EPA determined that Respondent did not promptly address compliance audit recommendations from a 2017 compliance audit and document that deficiencies had been corrected. Recommendations from the 2017 compliance audit that were not promptly addressed included installing a remote (break-glass) emergency shutdown switch outside the machinery room exit and ensuring the ammonia detection system activates a visual alarm.

38. By failing to promptly address compliance audit recommendations, Respondent violated CAA Section 112(r)(7), 42 U.S.C. § 7412(r)(7), and 40 C.F.R. § 68.79(d).

D. CIVIL ADMINISTRATIVE PENALTY

39. EPA proposes that Respondent be assessed, and Respondent agrees to pay **ONE HUNDRED EIGHTY-TWO THOUSAND SIX HUNDRED FIFTY-NINE DOLLARS (\$182,659.00)**, as the civil administrative penalty for the violations alleged herein.

40. The proposed penalty was calculated in accordance with the "Combined Enforcement Policy for Clean Air Act Sections 112(r)(1), 112(r)(7), and 40 C.F.R. Part 68" dated June 2012, and was adjusted for inflation by the Federal Civil Penalties Inflation Adjustment Act, as amended, and the Civil Monetary Inflation Adjustment Rule, 40 C.F.R. Part 19.

E. ADMISSIONS AND WAIVER OF RIGHTS

41. In accordance with 40 C.F.R. § 22.18(b)(2) and for the purpose of this proceeding, Respondent: (i) admits that EPA has jurisdiction over the subject matter of this CA/FO and over Respondent; (ii) neither admits nor denies the specific factual allegations contained in the CA/FO; (iii) consents to any and all conditions specified in this CA/FO and to the assessment of the civil administrative penalty under Section D of this CA/FO; (iv) waives any right to contest the

allegations contained in Section C of the CA/FO; and (v) waives the right to appeal the proposed final order contained in this CA/FO.

F. PARTIES BOUND

42. This CA/FO shall apply to and be binding upon Respondent, and its successors and assigns, until such time as the civil penalty required under Section D and any additional civil penalty required under Section H have been paid, and any delays in performance and/or stipulated penalties have been resolved.

43. No change in ownership or legal status relating to the Facility will in any way alter Respondent's obligations and responsibilities under this CA/FO.

44. Until all the requirements of this CA/FO are satisfied, Respondent shall give notice of this CA/FO to any successors in interest prior to transfer of ownership or operation of the Facility and shall notify EPA within seven (7) days prior to such transfer.

45. The undersigned representative hereby certifies that they are fully authorized by the Respondent to enter into and execute this CA/FO, and to legally bind Respondent to it.

G. COMPLIANCE TASK

46. All submissions to EPA in this section shall be in writing and submitted to Rick Sakow at Sakow.Rick@epa.gov.

47. Within fifteen (15) days of completion of the Compliance Task described in Paragraph 49, Respondent shall submit documentation (e.g., photographs, receipts) and a certification of completion to EPA to show that the Compliance Task has been completed. EPA will reply to Respondent within a reasonable amount of time after receiving the certification of completion to inform the Respondent regarding whether the Compliance Task was sufficiently completed.

48. Extension(s) of Time. Respondent shall complete the Compliance Task by the date specified in Paragraph 49. If Respondent is unable to complete the Compliance Task by the date specified in Paragraph 49, Respondent shall submit a written request for an extension, including the basis for the request, to EPA. Respondent shall submit this request within seven (7) days of identifying a need for an extension. Based on this request, EPA may in its sole discretion grant or deny, in full or in part, the request for extension.

49. Respondent shall repair or replace the damaged or missing labels on ammonia refrigeration piping on the roof and evaporator piping in Rake Room #4. Respondent shall ensure that the labeling for all ammonia refrigeration piping at the Facility comply with ANSI/IIAR 2-2021. The individual tasks that Respondent must undertake to satisfy these requirements are outlined in Attachment I. Respondent shall arrange for this work to be completed by December 31, 2022. If extreme weather conditions prevent the work from being able to be performed safely by December 31, 2022, Respondent must request an extension of time to complete the Compliance Task following the procedures outlined in Paragraph 48.

H. PAYMENT OF CIVIL PENALTY

50. Respondent consents to the assessment of and agrees to pay a civil administrative penalty of **ONE HUNDRED EIGHTY-TWO THOUSAND SIX HUNDRED FIFTY-NINE DOLLARS (\$182,659.00)** in settlement of the civil penalty claims made in this CA/FO. This CA/FO constitutes a settlement of all claims for the violations of Section 112(r) of the CAA, 42 U.S.C. § 7412(r), alleged in Section C above.

51. Respondent shall pay the civil penalty within thirty (30) days of the Effective Date of this CA/FO, as established in Section L of this CA/FO.

52. All payments shall indicate the name of the Facility, EPA identification number of the Facility, Respondent's name and address, and the appropriate EPA docket number of this action. Payment shall be made by corporate, certified, or cashier's checks payable to "Treasurer of the United States" and sent as follows:

Regular Mail:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
PO Box 979077
St. Louis, MO 63197-9000

Overnight Mail:

U.S. Environmental Protection Agency
Government Lock Box 979077
1005 Convention Plaza
SL-MO-C2-GL
St. Louis, MO 63101

Contact: Craig Steffen, (513) 487-2091, steffen.craig@epa.gov

Alternatively, payment may be made by electronic transfer as provided below:

Wire Transfers:

Wire transfers must be sent through the Federal Reserve Bank of New York using the following information:

ABA: 021030004
Account Number: 68010727
SWIFT address: FRNYUS33
33 Liberty Street
New York, NY 10045
Beneficiary: US Environmental Protection Agency

Automated Clearinghouse:

Automated Clearinghouse payments to EPA can be made through the US Treasury using the following information:

US Treasury REX/Cashlink ACH Receiver

ABA: 051036706
Account Number: 310006, Environmental Protection Agency
CTX Format Transaction Code 22 – checking
Physical location of the US Treasury Facility:
5700 Rivertech Court
Riverdale, MD 20737
Remittance Express (REX): 1-866-234-5681

Online Payment through Pay.gov:

Credit or debit cards, as well as checking accounts, can be used to make payments using the information below:

Visit www.pay.gov.
Enter “SFO 1.1” in the search box on the top left side of the screen.
Open the form and follow the on-screen instructions.

A copy of each check, or notification that the payment has been made by one of the other methods listed above, including proof of the date payment was made, shall be sent with a transmittal letter via email, indicating Respondent’s name, the case title, and docket number, to both:

Regional Hearing Clerk (RC-1)
U.S. Environmental Protection Agency - Region 9
R9HearingClerk@epa.gov

And

Rick Sakow
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency - Region 9
Sakow.Rick@epa.gov

53. In accordance with the Debt Collection Act of 1982 and U.S. Treasury directive (TFRM 6-8000), failure to pay the penalty so that it is received by the due date will result in imposition of interest from the Effective Date of this CA/FO at the current interest rate published by the U.S. Treasury, as described at 40 C.F.R. § 13.11. In addition, a six percent (6 %) per annum penalty that will be assessed monthly will be applied on any principal amount not paid within ninety (90) days of the due date.

54. The penalties specified in this CA/FO shall represent civil administrative penalties assessed by EPA and shall not be deducted by Respondent or any other person or entity for federal, state, or local taxation purposes.

I. DELAY IN PERFORMANCE/STIPULATED PENALTIES

55. In the event that Respondent fails to meet any requirement set forth in this CA/FO, Respondent shall pay stipulated penalties as follows: FIVE HUNDRED DOLLARS (\$500) per day for the first to fifteenth day of delay, ONE THOUSAND DOLLARS (\$1,000) per day for the sixteenth to thirtieth day of delay, and FIVE THOUSAND DOLLARS (\$5,000) per day for each day of delay thereafter. Compliance by Respondent shall include completion of any activity under this CA/FO in a manner acceptable to EPA and within the specified time schedules in and approved under this CA/FO.

56. Stipulated penalties shall begin to accrue on the day after performance is due and shall continue to accrue through the final day until performance is complete. Respondent shall pay stipulated penalties within fifteen (15) days of receipt of a written demand by EPA for such penalties. Payment of stipulated penalties shall be made in accordance with the procedure set forth for payment of penalties in Section H of the CA/FO.

57. If a stipulated penalty is not paid in full, interest shall begin to accrue on the unpaid balance at the end of the fifteen-day period at the current rate published by the United States Treasury, as described at 40 C.F.R. § 13.11. EPA reserves the right to take any additional action, including but not limited to, the imposition of civil penalties, to enforce compliance with this CA/FO or with the CAA and its implementing regulations.

58. The payment of stipulated penalties specified in this Section shall not be deducted by Respondent or any other person or entity for federal, state, or local taxation purposes.

59. Notwithstanding any other provision of this section, EPA may, in its unreviewable discretion, waive any portion of stipulated penalties that have accrued pursuant to this CA/FO.

60. The determination of whether Respondent has satisfactorily complied with the terms of this CA/FO and the determination of whether Respondent has made a good faith, timely effort to complete the tasks required by this CA/FO are within the sole direction of the Director, Enforcement and Compliance Assurance Division, EPA Region 9.

J. RESERVATION OF RIGHTS

61. Except as addressed in this CA/FO: EPA hereby reserves all of its statutory and regulatory powers, authorities, rights and remedies, both legal and equitable, including the right to require that Respondent perform tasks in addition to those required by this CA/FO; EPA further reserves all of its statutory and regulatory powers, authorities, rights and remedies, both legal and equitable, which may pertain to Respondent's failure to comply with any of the requirements of this CA/FO, including without limitation, the assessment of penalties under the CAA or any other statutory, regulatory, or common law enforcement authority of the United States; and this CA/FO shall not be construed as a covenant not to sue, release, waiver or limitation of any rights, remedies, powers or authorities, civil or criminal, which EPA has under the CAA, or any other statutory, regulatory, or common law enforcement authority in the United States.

62. Compliance by Respondent with the terms of this CA/FO shall not relieve Respondent of its obligations to comply with the CAA, or any other applicable local, state, tribal, or federal laws and regulations. This CA/FO is not intended to be nor shall it be construed as a permit. This CA/FO does not relieve Respondent of any obligation to obtain and comply with any local, state, tribal, or federal permits nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, tribal, state, or local permit.

63. The entry of this CA/FO and Respondent's consent to comply shall not limit or otherwise preclude EPA from taking additional enforcement action should EPA determine that such actions are warranted except as it relates to those matters resolved by this CA/FO. Respondent's full compliance with this CA/FO shall only resolve Respondent's liability for federal civil penalties for the violations and facts alleged in this CA/FO.

64. EPA reserves its right to seek reimbursement from Respondent for such additional costs as may be incurred by the United States in the event of delay of performance as provided by this CA/FO.

K. MISCELLANEOUS

65. This CA/FO may be amended or modified only by written agreement executed by both EPA and Respondent.

66. The headings in this CA/FO are for convenience of reference only and shall not affect interpretation of this CA/FO.

67. Each party to this action shall bear its own costs and attorneys' fees.

68. Respondent consents to entry of this CA/FO without further notice.

L. EFFECTIVE DATE

69. In accordance with 40 C.F.R. §§ 22.18(b)(3) and 22.31(b), this CA/FO shall be effective on the date that the Final Order contained in this CA/FO, having been approved and issued by the Regional Judicial Officer, is filed with the Regional Hearing Clerk.

In the Matter of Reddy Ice LLC
Consent Agreement and Final Order

IT IS SO AGREED.

United States Environmental Protection Agency, Region 9

By: AMY MILLER-BOWEN
Amy C. Miller-Bowen
Director, Enforcement and Compliance Assurance
Division

Digitally signed by AMY
MILLER-BOWEN
Date: 2022.09.26
12:35:03 -07'00'

Respondent Reddy Ice LLC

DATE: 9/12/22

By: 
Steven J. Janusek
Executive Vice President, CFO and Treasurer

FINAL ORDER

IT IS HEREBY ORDERED that this Consent Agreement and Final Order (“CA/FO”) in the Matter of Reddy Ice LLC (Docket No. CAA (112r) 09-2022-0049) be entered and that Respondent shall pay a civil penalty in the amount of **ONE HUNDRED EIGHTY-TWO THOUSAND SIX HUNDRED FIFTY-NINE DOLLARS (\$182,659.00)**, due within thirty (30) days from the Effective Date of this CA/FO, and implement the compliance tasks described in Section G, in accordance with the terms of this CA/FO.

Steven L. Jawgiel Date
Regional Judicial Officer
U.S. EPA, Region IX

ATTACHMENT I

The Compliance Task required by Paragraph 49 is comprised of the work identified and summarized in the following table:

MII Item	Category	Unit ID	Action
1	Unit Labeling	N/A	Rename equipment unit IDs to match P&IDs
15	Pipe Labeling	N/A	Replace all faded/illegible rooftop pipe labeling
16	Valve Tagging	N/A	Replace missing valve tagging at rooftop valve stations
22	Valve Tagging	AU-6	Replace missing valve tags
23	Unit Labeling	AP-1	Label unit
27	Unit Labeling	N/A	Label all compressors
28	Unit Labeling	N/A	Label all oil separator vessels
43	Valve Tagging	C-6	Replace missing valve tags
48	Unit Labeling	C-7	Label Unit
53	Unit Labeling	C-8	Label Unit
55	Unit Labeling	N/A	Label all condensers
57	Pipe Labeling	N/A	Replace all faded/illegible condenser pipe labeling
58	Pipe Labeling	N/A	Replace all faded/illegible condenser pipe labeling
59	Valve Tagging	N/A	Replace missing valve tags at condensers
65	Valve Tagging	CPR-1	Replace missing valve tags
75	Valve Tagging	ACC-3 TV	Replace missing valve tags
79	Valve Tagging	WC-1 SD	Replace missing valve tags
90	Pipe Labeling	AU-8	Replace all faded/illegible pipe labeling
92	Valve Tagging	AU-9	Replace missing valve tags
104	Valve Tagging	IM-2	Replace missing valve tags

