



CITY MANAGER REPORT

Reporting Period: June 16 – September 14, 2023

Prepared By: Phillip A. Zavadil, City Manager

Date: September 14, 2023

ADMINISTRATION

ESSENTIAL AIR SERVICE

The US Department of Transportation issued the attached Order on September 14, 2023 and it will be uploaded on to www.regulations.gov under docket DOT-OST-2019-0038. Ravn Alaska will be providing essential air service to Saint Paul Island for the next two years.

FISHERIES

Disaster Funding - Mateo and I have been busy working to figure out the process and timeline on the fisheries disaster funding and will be presenting this information in a workshop with the City Council.

MSA Comments – Mateo prepare a comment letter for the City and CBSFA on the draft Magnuson-Stevens (MSA) bill. The joint comment letter was submitted on September 8, 2023 (*see attached*).

NS Guideline Comments – Mateo prepare a comment letter for the City and CBSFA on revision to MSA National Standards 4, 8, and 9 Guidelines. The joint comment letter was submitted on September 11, 2023 (*see attached*).

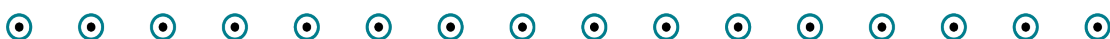
COASTAL ENERGY IMPACT PROGRAM (CEIP) LOAN

After 23 years of discussions, the City of Saint Paul recently received confirmation from the NOAA Office of Coastal Management (*see attachment, a letter dated July 24, 2023*) that NOAA is prepared to proceed with a recommendation to Congress that legislation be enacted forgiving Saint Paul’s Coastal Energy Impact Program (CEIP) loan as is allowed by the Coastal Zone Management Act for non-performing loans.

See attached letter from Mayor Mercurief, to Senators Murkowski and Sullivan, and Representative Peltola, requests NOAA offices support for the enactment of legislation to forgive this loan.

Also included is a letter dated April 2023 sent by the City to Secretary and two attachments for background information on this matter.

The City of Pascagoula, Mississippi, is in a similar position regarding its request for CEIP loan forgiveness. We met virtually on August 21, 2023 with Pascagoula representatives to discuss possible coordination among our two communities and our respective congressional offices. We understand from Pascagoula Mayor, Jay Willis, that Representative Mike Ezell is one of their residents.



We have been in touch with NOAA’s Office of Legislative and Intergovernmental Affairs, Makeda Okolo, Director and Melanie Jackson, Congressional Affairs Specialist and look forward to working them resolve this long overdue matter.

PLANNING AND ZONING

ACSPI Duplexes – The Aleut Community of Saint Paul is planning on constructing new duplex units along Colonel Fouke Street. I am waiting for them to submit an Application for Construction Permit for review. Since the sewer main needs to be extended, I am waiting for review of the utility extension agreement. Both documents will be required prior to construction and a notice to proceed is issued.

SPF Fuel Line – St. Paul Fuels is working with K Corp Reliance Company to redesigning all piping from the TDX storage tanks, marine header, and a new truck loading rack. The lead engineering for the project reached out to me regarding acquiring information on plots, land ownership, and utility maps. I sent the engineer the information he requested and informed him of the City’s planning and zoning process and sent him the required documentation application for this project.

USCG Plat – Over the past year I have been communicating with the US Coast Guard regarding Tract 43- Lots 3, 4 and 5 and the land underlying the Polovina Turnpike as it transverses through Tract 43 to TDX to transfer to TDX. On August 30, 2023 I received the attached letter from Commanding Officer Tracey L. Torba. After consulting the City’s legal counsel, I responded to CDR Torba with the following email:

I have reviewed the USCG correspondence dated August 30, 2023 raising the following concerns:

- The lack of easement for City electric running to the SSX building on Tract 43. Thank you for identifying the issue and your approach makes sense. We will review the drafted easement.*
- The purported lack of authority to grant the dedications on Tract 43 to the City made for the (1) Airport Road/Polovina Turnpike and (2) electrical easement between Lot 2 and Lot 4. The electrical easement is an easement and there was no fee simple interest transferred (under either the definition of “Dedication” or “Easement” in CCO 18.20.010 - <https://saintpaul.municipal.codes/CCO/18.20.010>). Please let me know if there were still concerns in the granting of that easement.*
- Regarding the Polovina Turnpike, it is unclear what a replat would accomplish considering the road is in place and the City relied on USCG’s representation of authority. With the crab fishery closure, the City has extremely limited financial and staff resources. To the extent the USCG believes this is an issue that it needs to spend its resources on, USGS should work out a consent with TDX and the City will work with USGS to ensure that such a consent is recorded and linked to the prior platting action.*

Please feel free to reach out to me based on the above.

INSURANCE

Nadia, Stephanie, and I worked on the insurance renewal. To minimize the premium increase, we had to increase the property deductible from \$25,000 to \$150,000 and eliminate earthquake and flood

coverage. With the changes mentioned above the City will still see a total annual premium increase of \$35,022.53. Below is a table of the increases by coverage:

Coverage	Expiring Premium 7/1/22-23	Renewal Premium 7/1/23-24	Percent Increase
Property	\$170,871.22	\$227,560.48	33.1%
Boiler & Machinery/Equipment Breakdown	Included	Included	
Commercial General Liability	\$55,301.74	\$42,534.10	-23%
Marine General Liability	\$2,450.00	\$2,700.00	10%
Volunteer Accident	Included	Included	
Business Auto	\$25,735.15	\$21,622.54	-15.9%
Crime & Fidelity	\$373.16	\$274.53	-26.4%
Cyber Liability	\$2,520.57	\$2,337.82	-7.25%
Workers' Comp	\$23,819.31	\$19,064.21	-19.9%
Pollution	\$30,429.00	\$33,513.00	10.14%

For more details, please see the attached renewal document.

COMPREHENSIVE ECONOMIC DEVELOPMENT STRATEGY

St. Paul CEDS Community Partners Meeting – On September 18, 2023 the entities will meet to discuss the following:

- Go over the October community conversation agenda and talk through the community partners portion of the October community conversation, including preliminary responses to the guiding questions.
- Discuss any major needed updates to the emerging strategies list we refined together in the spring.
- Open invitation for partners to share any other relevant updates.
- Review next steps and immediate follow up.

Others and I have the following concerns regarding the attached emerging strategies list:

- The list does not include the identified community needs from the previous community meeting.
- Many of the entities have not approved of some of the “projects” on the list that their names is attached to.
- Preparing a list of strategies without having meaningful conversation with the community and its residents is putting the cart before the horse.
- The list of emerging strategies is too long and will not easily be accomplished in the next 3 to 5 years. The focus should be on the top three economic development strategies that will stabilize our local economy with the fisheries closures.
- Many of the “projects” on the list are specific entity strategies and the plan is a entity strategic plan and not a CEDS.

St. Paul’s Future: A Community Conversation – On October 10 and 11, 2023 from 5:30 to 8:00 pm in the Rec Hall (*see attached flyer*) there will be a community conversation that will involve:

- Learning what we’ve heard so far
- Hear from community partners on their plans
- Discuss the future of St. Paul:
 - What is our vision for our community?
 - How can we get there together?
 - How do we address our cost of living and grow our economy?

Community Survey – Agnew Beck facilitated a CEDS community survey (*see attached survey results*).

US ARMY CORPS OF ENGINEERS

2024 Harbor Maintenance

USACE conducted a field survey in 2022 of the Saint Paul Harbor navigational features to identify any need for constructing repairs and/or maintenance dredging. The recent field survey revealed the need to address hazards threatening the Federal navigation features at the Saint Paul Harbor. Specifically, USACE proposes to:

- Dredge approximately 140,000 cubic yards of sand from the main entrance channel, main maneuvering area, small boat harbor entrance channel, small boat harbor mooring and maneuvering area, and sediment management area. The dredged material from all the dredged areas will be placed in upland locations at Kaminista and the Ataquan Landfill to be used beneficially by the City.
- Repair the main breakwater energy dissipation reefs, which will involve:
 - Placing approximately 22,000 cubic yards of rock to repair main breakwater and energy dissipation reefs.
 - Placing approximately 5,000 cubic yards rock to repair the main entrance channel scour holes.
 - Placing approximately 3,000 cubic yards rock to repair the small boat harbor entrance channel scour holes.

To perform this work the Alaska District of the USACE has prepared an environmental assessment (EA) and draft finding of no significant impact (FONSI) for the maintenance dredging, energy dissipation reef repair, and scour hole repairs in the Saint Paul Harbor. Please see the attached Public Notice for a brief project description and contact information. The EA/FONSI is available on the Alaska District website at: <https://www.poa.usace.army.mil/Portals/34/StPaulHarborOMDEA.pdf>. Comments on the draft EA and FONSI will be accepted until September 29, 2023.

Planning Assistance to States – On August 24, 2023, Lynn, Mateo, and I met with representative of USACE Alaska District to discuss the status of the City’s planning assistances to states request for to

the USACE to prepare an economic study of the improvement and expansion of the Saint Paul Harbor. We recently requested a waiver on the match requirement based on a distressed community designation. USACE is still reviewing the request.

General Investigation Request – Lynn and I worked on preparing an updated letter requesting the USACE conduct a general investigation study for improvement and expansion of the Saint Paul Harbor (*see attached*). The letter was submitted on September 11, 2023 and included language regarding waiving the match requirement for such a study.

AGREEMENTS/CONTRACTS/GRANTS

EDA Small Boat Harbor (SBH) Utilities Extension

Surveyors – In August this year Kuna Engineering surveyors were onsite to surveyor the small boat harbor and utilities for preparation of a base map of the area. The base map will be used to the construction drawing set.

Engineering Site Visit – On September 10-14, 2023 Kuna Engineering engineers were on site to review the survey and discuss details and routing of the electrical, sewer and water mains for this project. Per discussions with the engineers, the plans will be to:

- Replace the sectionalizing cabinet across from Adorm with a larger cabinet to run new electrical cable to power the new SBH lift station, harbor lights and future harbor office. The route for this new electrical line will run in the existing easements.
- Extended the water main from the hydrant east of Adorm to the water main on Polovina Turnpike. The water main will run in the new Harbor Road easement. Two new hydrants will be installed to service the SBH and future hotel site.
- Install a new sewer lift station and main on the east side of Adorm. A new easement will be required for this.

Easements – Kuna Engineering met with John Lyons with TDX Power to discuss the easements required for the sewer portion of this project and to work out the details regarding these easements. Once the 35% design set is completed, I will be submitting a new easement request to TDX for the sewer portion of this project.

USDA Loan for Electric Utility Upgrades – The City is waiting on loan approval.

USDA RUS HECG for Airport Feeder Replacement – The City was requested to update implementation plan and budget (*see attached*) for this project so when the USDA Loan is approved the HECG grant office can extend the grant. Lynn and I worked with EPS to update the implementation plan and budget, which has been submitted to USDA for review.

USEPA STAG for Aalax Solid Waste Facility – The City is waiting on approval of the award documents before we begin work on this project.

SOA CBDG and AEA for Bulk Fuel Facility Upgrades – Both grant awards has been finalized. The contract with Polarconsult to is finalized. On August 30, 2023, I held a kickoff meeting with Mike Dahl and Joel Groves with Polarconsult to discuss the engineering portion of this project (*see attached meeting notes*).

USDOT SS4A Grant for Comprehensive Safety Action Plan – The City received the grant award documents from USDOT for this project (*see attached*). Lynn and I met with Mayor Mark Mercurief and Connie Fredenberg with the City of Saint George to review the award and request for proposal document. Lynn and I prepared a request for proposals to hire a consultant to prepare a comprehensive safety action plan for the Pribliof Islands (*see attached*). The schedule for the RFP and plan completion is as follows:

Release of RFP	August 29, 2023
Proposals Due	October 6, 2023
Review of Proposals Completed	October 20, 2023
Selection of Contractor.	October 27, 2023
Negotiation of Contract	November 1, 2023
Draft CSAP Completion	July 30, 2024
CSAP Completion	January 1, 2025
CSAP Adoption	April 1, 2025

The City is looking for community members to participate on a Transportation Safety Action Taskforce (*see attached announcement*). Members of the taskforce will be involved in the development of the comprehensive safety action plan.

Thriving Communities Technical Assistance – The City was accepted to participate in the US Department of Transportation’s Thriving Communities Program. On July 27, 2023 Lynn and I participated in an introductory meeting with USDOT staff and the consultants that will be providing technical assistance. This meeting was to understand the initial needs to formulate a work plan. On August 31, 2023 we participated in a partners meeting with the consultants, ACSPI, CBSFA, PSD and TDX. At this meeting we reviewed the workplan (*see attached*) for the technical assistance that will be provided. The workplan is still waiting to be finalized.

SOA VSW Lift Station Replacement Grant – The City is waiting for Kuna Engineering to finalize the 95% construction drawing set for the Sandy Lane and Ellerman Lift Stations. Once the 95% drawings are approved, the Village Safe Water staff will prepare a request for proposals for bidding on construction for this project.

SOA VSW CIP Planning Grant – The City applied and received funding from the State of Alaska’s Village Safe Water program for preparing a preliminary engineering report (PER) for upgrading the water treatment plant, upgrading valve house building below the water tanks, and replacing the ductile cast iron water lines in the old town area (*see notice of award*). The City applied for \$75,000 for each project but was only awarded \$129,000 for all three projects. This funding does not come directly to the City but instead administered and managed by VSW. It is expected the work on the PERs for these projects will begin in the new year.

See Project/Grant Specialist’s report for more information on grants.

INFORMATION TECHNOLOGY

New Firewall – LMJ provide the City with a new updated firewall. The purpose of the firewall is to protect the City’s IT network from cyberattacks and protect the sensitive data on the network. Aubrey worked with LMJ Consulting to install the new firewall box but encountered some issues and is working with LMJ to resolve the issues.

MFA – In order for the City to be covered on the new cyber insurance policy, we needed to implement multifactor authentication (MFA). The City worked with LMJ Consulting to implement MFA on Office 365. Other programs and software the City uses already has some form of MFA built in. Implementation of MFA services cost \$1,450.

Managed Services and Security Agreement – In July I signed a three-year managed IT services and security agreement with LMJ Consulting. LMJ has been providing managed IT services to the City for approximately 6 years. LMJ changed their rates, which is not based on per user, which will result in approximately \$1,500 savings annually to the City.

Website Updates – Lynn worked with Aubrey and I to update the public safety page and contacts page on the City's website to reflect the shift from police officers to VPSOs. See: <https://stpaulak.com/public-safety/> and <https://stpaulak.com/contacts/>.

Scan to Email – The past few months the City has had issues with scanning to email from our Sharp multifunction copiers. Staff have worked with Valley Business Machines (VBM), who we purchase the copiers from and LMJ Consulting to identify the issue. LMJ techs have determined that Starlink may be causing the issue. Currently, we are still scanning to email but over an unsecured network. VBM has informed us that this is a temporary fix. LMJ proposed two options to fix the issue: 1) purchase an O365 license for an email just for the scanners at \$35.00 per month or 2) set up the scanners to scan to a folder on the server. Given the City's financial situation, we chose to go with second low-cost option.

CAPITAL IMPROVEMENT PLAN

Lynn and I have been working on updating the City's capital improvement plan to include new funding, new projects, projects completed, and future projects and needs. We expect to have a draft plan for City Council review in January 2024. Meanwhile, I have extended the current plan dates until we have an approved updated plan (*see attached letter*).

PRIBILOF ISLANDS WILDLIFE PROTECTION GUIDELINES

The revised Pribilof Islands Wildlife Protection Guidelines are available online at multiple sites:

- ADEC webpage (see the "Wildlife, Fish, and Their Habitats" section): <https://dec.alaska.gov/spar/ppr/contingency-plans/response-plans/tools/>
- ARRT homepage: <https://www.alaskarrt.org/>
- NOAA Fisheries oil spill response page (see the "Alaska Regional Guidelines" section): <https://www.fisheries.noaa.gov/alaska/marine-life-distress/alaska-oil-spill-response-guidance>

DEPARTMENT OF PUBLIC SAFETY

PERSONNEL

Community Service Officer David Merculieff transferred to the open power plant operator position.

VPSO Kevin Davis arrived on island on August 20, 2023.

VPSO Logan Safely is expected to arrive on island on September 18, 2023.

We have had trouble with staffing dispatch and have sent out Nixles to inform the community when dispatch is not available and the numbers to call in the event of an emergency. Jackie Kudrin was hired as a temp dispatcher on September 7, 2023. Jackie has two years of dispatcher experience. She previously worked at UAA and Bethel dispatcher centers and is familiar with eForce CAD system that the City uses.

INCIDENT DATA

I am working on how the City will report public safety incident data. For now Zack our EMT will be reporting on EMS call separately and I will be reporting on fire calls. Since VPSO use the ARMS with the State Department of Public Safety's records management system, I will need to work with APIA to report on cases that are entered into ARMS. However, calls for all public safety services are entered into the City's eForce system. Not all law enforcement calls are entered into ARMS. In the coming months I will be trying to figure out an accurate and efficient method for reporting on law enforcement calls for service.

AGREEMENTS

The VPSO agreement between the Aleutian/Pribilof Islands Association (APIA) and City has been executed (*see attached*).

The Use of Holding Facilities Addendum between the Aleut Community of Saint Paul Island (ACSPI) and City has been renewed (*see attached*).

I am working with ACSPI and APIA to revise two other agreements regarding public safety and cross commissioning of VPSOs.

FIRE

On August 25, 2023, there was a fire reported at the landfill that was not in the burn box. Fire department personnel were dispatched and extinguished the fire that was on the ground in the open cell. I present more details on this fire in the Refuse Utility section of this report.

On August 29, 2023, a vehicle fire was reported. The fire was self-extinguished, and no fire personnel were dispatched to this call.

PUBLIC WORKS DEPARTMENT

MAINTENANCE AND OPERATION DIVISION

Personnel – City is currently advertising for a Facilities Maintenance Worker position (*see attached job announcement*). We are looking for someone with maintenance experience, preferably with boiler maintenance experience and a valid driver's license. Carl Stepetin has been hired a temp to assist with grading roads and for snow removal.

Boilers – City has had several boiler issues in our housing units. We have ordered some extra parts that are needed to replace zone valves, etc. Mayor Jacob as been a big help with fixing some of the boiler issues.

Building Maintenance – Mac has been addressing maintenance issues on City buildings as they arise. On September 8, 2023, City and 3E Construction crews repaired on of the overhead doors on the fire station. 3E Construction is assisting with parts on the doors that need replacement. One of the doors

is still not functional but will be repaired once the parts arrive. Pioneer Door in Anchorage is no longer sending out crews to make repairs to overhead doors.

MOTOR POOL DIVISION

Garbage Truck – The hydraulic rams for the rear door were sent to Anchorage Hydraulics to be rebuilt. They have been installed but the rear door is still not lifting correctly. Johnny talked with Nate Berry on a couple of other items to check.

Fuel Tanker – The fuel tanker has several issues with the air system and breaks and is being worked on to determine what parts are needed to make this truck operational again.

AWD 160 Grader – We are still waiting for the correct hose to be shipped.

Vacuum Sewer Truck – The PTO drive shaft and new yolk has been shipped and will be installed when it arrives.

Pickup Trucks – Brakes on Fire Rescue F150 are being installed. A new alternator was ordered for one of the patrol vehicles, and several trucks need new tires and batteries.

BULK FUEL UTILITY

Personnel – City is currently advertising for a Bulk Fuel Operator/Gas Station Attendant position (*see attached job announcement*).

Fuel Supply - As of September 1, 2023 the City has a total of 97,385 gallons of gasoline of which 96,136 gallons is from the 2023 deliveries and 1,249 gallons is from the old supply. The City has a total of 585,307 gallons of diesel of which 510,619 is from the 2003 deliveries and 69,912 is from the old supply.

Fuel Resupply – On August 17, 2023, Vitus delivered the remaining resupply of diesel and gasoline. The City received 119,725 gallons of diesel and 25,000 gallons of gasoline.

Tabletop Exercise and Spill Drill – On August 14, 2023, Aubrey, Caitlin and I participated in a tabletop exercise facilitated by Integrity Environmental with St. Paul Fuels personnel. On August 15, 2023, City and SPF personnel participated in a spill drill. See that attached memo on the exercise and drill.

Spill Response Agreement with SPF – Integrity Environmental is assisting with preparing a spill response agreement between the City and St. Paul Fuels. The draft agreement is currently under review by TDX Services management.

ELECTRIC UTILITY

Personnel – David Merculieff transferred from Department of Public Safety as the Community Service to the Public Works Department Electric Utility as a Power Plant Operator. David is currently attending the online portion of the power plant operator training and will attend in person training at AVTEC in January 2024.

Unscheduled Power Outage – On July 26, 2023 in the afternoon, there was an unscheduled power outage while City personnel were training on how to restore power in the event of a power outage. While showing staff on how to switch on or off one of the switches on the G&W Switch the lever fell automatically causing power to town to go off. This is not supposed to occur. The G&W Switch is scheduled to be replaced soon.

Trident Connection – I am working on finalizing the Electrical Services Agreement with Trident. Once this agreement is signed, I will provide EPS with a notice to proceed for this project. The goal is to start this project in September and complete the connection in October of this year.

Meeting with John Lyons TDX Power – On August 28, 2023, I met with John Lyons with TDX Power via Zoom to discuss the City’s plans on the electric utility upgrades and future collaboration projects with TDX Power. We planned a follow up meeting to get into more detail but that has not been scheduled yet.

Notice Regarding Disconnect, Payment Plan, Etc. – Admin and Finance staff worked on updated forms regarding past due accounts, the disconnect notice, and payment plan to be in line with the updated Electric Utility ordinance. For reference, see the attached Customer Letter, Utility Disconnect Notice, and Utility Payment Agreement.

WATER UTILITY

Water Samples – Coliform sample were collected for July and August 2023 and made it out to the lab for analysis (*see attached results*). Trihalomethane (TTHM) samples were collected in August and sent to the lab for analysis. The City has not received the results yet. Halocetic (HAA5) samples are scheduled to be collected in September. Both TTHM and HAA5 are supposed to be collected in July but the sample kit did not arrive until first part of August. The lab is sending out additional sample bottles for Lead and Copper to collect at four additional sample locations. Once the kit arrives Adrian, we collect these samples to send out to the lab. Ravn changed their flight schedule and there is no longer Monday flights. This is a problem with collecting the monthly coliform samples and getting the samples to the lab in time for processing. The health center has expressed similar concerns with sending out blood samples to the lab. I emailed Ravn management to share the concerns and request a schedule change that accommodates shipping of blood and water samples.

ANTHC Environmental Health and Safety Survey – In August, ANTHC performed an Environmental Health and Safety Survey on the City’s refuse, sewer, and water utilities. Attached is the results of the survey. I will be working with the utility staff to address the concerns identified in the survey.

SEWER UTILITY

Lift Station Issues – The Ellerman lift station has been having issues with pumps clogging due to wipes and other items that should not be flushed. The uptown customers need to stop flushing wipes and other items down the toilet and drains. We have sent out numerous public service announcements (*see attached*) regarding this concern, but pumps are still clogging.

Saint Paul Health Center Septic Tank – The health center has had some issues with their septic tank, which causing our operator to have to pump out the tank multiple times a week. After some investigation Adrian found there was a cleanout filter near the tank that was clogged and did not receive regular maintenance. Adrian and I informed clinic staff that this filter needs to be cleaned out on a regular basis. We hope this resolves the problem.

NOAA Staff Quarters Septic Tank – Last year the pumps for the NOAA Staff Quarters septic tank stopped working. NOAA removed the pumps and send them out to get rebuilt. The rebuilt pumps are here and scheduled to be installed this month. With these pumps not working to push the sewer waste to the City main, our operator has had to pump out the tank once a week or more depending on the

number of guests in the building. Replacing the pumps will eliminate the need to pump out this tank so frequently.

Septic Tanks – With the problems various customers have been having with their septic tanks and the lack of scheduled preventative maintenance which would include adding enzymes on a regular basis and high pressure washing every three yards I have been research the cost for enzymes and a high-pressure washer so that the City may consider offering these as an additional service.

ANTHC Environmental Health and Safety Survey – See above.

REFUSE UTILITY

Outreach – The City has been receiving several questions regarding refuse service. Refuse service is regulated by the Code of City Ordinance Chapter 13.20 Solid Waste Disposal and Sanitation (see <https://saintpaul.municipal.codes/CCO/13.20>). In response to these questions, we have sent out the attached public service announcements (*see attached*).

Community Pick Cleanup – In August CBSFA and TDX picked up large items by some homes and took them to the City landfill for disposal. Thank you to CBSFA and TDX for picking up these items and for CBSFA for covering the costs for disposal. Finance staff are assembling the data for billing CBSFA. Next meeting, I will include a summary of the items that were picked up.

Landfill Fire - On August 25, 2023, there was a fire reported at the landfill that was not in the burn box. Fire department personnel were dispatched and extinguished the fire that was on the ground in the open cell. The fire was set by another City employee that is not the landfill operator. Burning on the ground is prohibited by the City's Class 3 Landfill permit (*see attached*). I will be addressing this with employees, so we avoid this in the future.

ANTHC Environmental Health and Safety Survey – See above.