



APPLICATION FOR APPEAL

Saint Paul City Council – Legislative Hearings

310 City Hall, 15 W. Kellogg Blvd.

Saint Paul, Minnesota 55102

Telephone: (651) 266-8585

We need the following to process your appeal:

- \$25 filing fee (non-refundable) (payable to the City of Saint Paul) (if cash: receipt number check #7374)
- Copy of the City-issued orders/letter being appealed
- Attachments you may wish to include
- This appeal form completed
- Walk-In OR Mail-In
for abatement orders only: Email OR Fax


<p>HEARING DATE & TIME (provided by Legislative Hearing Office) Tuesday, December 7, 2021</p> <p>Time: you will be called between 2:00 PM & 4:00 PM</p> <p>Location of Hearing: Teleconference due to Covid-19 Pandemic</p>

Address Being Appealed:

Number & Street: 690 and 680 Bayfield St City: St. Paul State: MN Zip: 55107

Appellant/Applicant: 3M Aviation Email djburgess@mmm.com

Phone Numbers: Business 651-338-9943 Residence 651-733-2700 Cell 651-338-9943

Signature:  Date: 11/18/2021

Name of Owner (if other than Appellant): N/A

Mailing Address if Not Appellant's: N/A

Phone Numbers: Business N/A Residence N/A Cell N/A

What Is Being Appealed and Why? *Attachments Are Acceptable*

- Vacate Order/Condemnation/Revocation of Fire C of O
 - Summary/Vehicle Abatement
 - Fire C of O Deficiency List/Correction
 - Code Enforcement Correction Notice
 - Vacant Building Registration
 - Other (Fence Variance, Code Compliance, etc.)
- We are appealing two Fire Inspection Correction Notices both in reference to the same issue regarding a "Void Space" that was created when a structure was demolished between the 3M 680 and 690 hangar buildings at the Downtown St. Paul Airport. Please see the attachments for further information.

Attachment to 3M Aviation appeal of Fire Inspection Correction Notice, filed November 19, 2021

This appeal is specific to number three on both Deficiency Lists for correction notices 24895 and 94906, respectively. Both deficiencies are titled "Southeast Corner" and address missing coverage for a "void space". No other issues are being appealed.

The 3M hangars located at 690 Bayfield Street consist of two separate large Aircraft Hangars, known as 680 and 690. When first built in the early 1940's, the two hangar buildings had an administrative office between them. This building fell into disrepair and was demolished in the late 90's. When the building was demolished, a pocket on each hangar had to be built to accommodate the large sliding doors that open to move aircraft in and out of the hangar(s). This pocket has created the void space in question.

This appeal first is asking the City of Saint Paul to grant a hardship variance for the missing sprinkler coverage in these small void spaces, based upon the following facts:

- They are not intended for human occupancy, passthrough or movement.
- They are not intended or used for storage of any type.
- The area in question is over 50 feet high, but it has a working width of less than 43 inches wide. This makes completely closing off the area from the rest of the hangar to the door pocket significantly dangerous to the safety and health of construction workers. OSHA standards for scaffolding state that when working at height, scaffolding must have a minimum 4:1 width to height ratio or be braced. In this instance, the 4:1 ratio cannot be achieved and supporting braces cannot be set against the moving doors. Additionally, the doors cannot be opened to make more room because, when opened, the doors fill the void and block the void space.
- Extending sprinkler piping, heads and water into this area comes with a freezing risk, as the area is open to the hangar but does not receive any forced air and is in the furthest corner from heat. Pipes will be less than 40 inches from the exterior doors and the void space is uninsulated. Furthermore, the addition of sprinkler piping comes with similar challenges for working at height safely.
- This void space is fully constructed of metal materials, so the walls and ceiling are non-combustible. If fire were to occur in the void, it would have to migrate into an area that has sprinkler coverage to impact the rest of the hangar.
- Aircraft hangars are subject to NFPA 409, which is undergoing a significant revision for 2022. Are we assured this order is in keeping with the updated NFPA 409?

It is our belief that the risk of completing the work asked for in the Fire Inspection Correction Notice outweighs the benefits gained from completing the work in terms of safety.

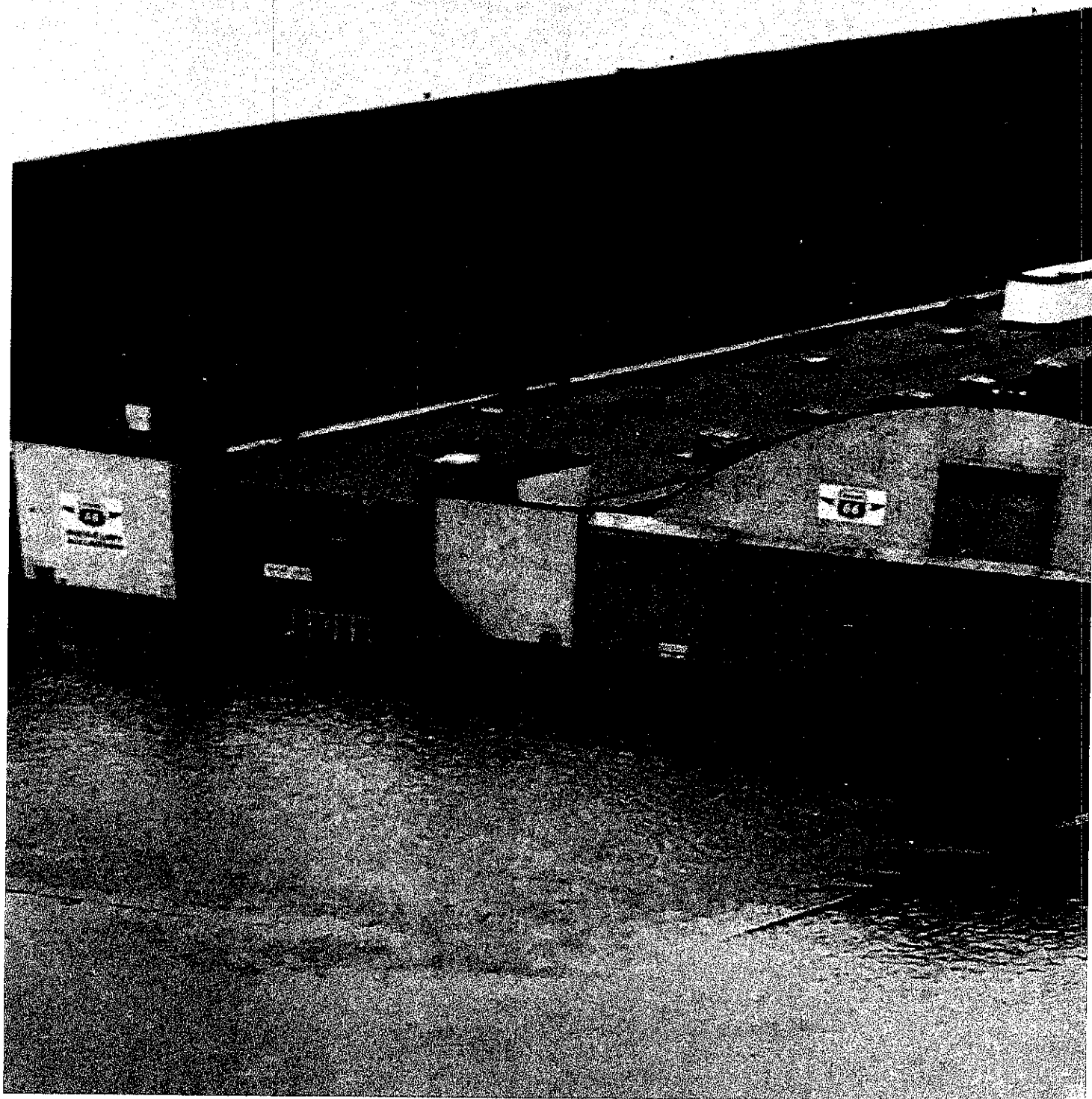
Secondly, in the event that the hardship variance is not granted, 3M would request a 365 day extension to engineer a solution that meets the Correction Notice and eliminates the risks mentioned above, along with time to complete the needed construction. 3M notes these void spaces have been in place for over 25 years without incident.

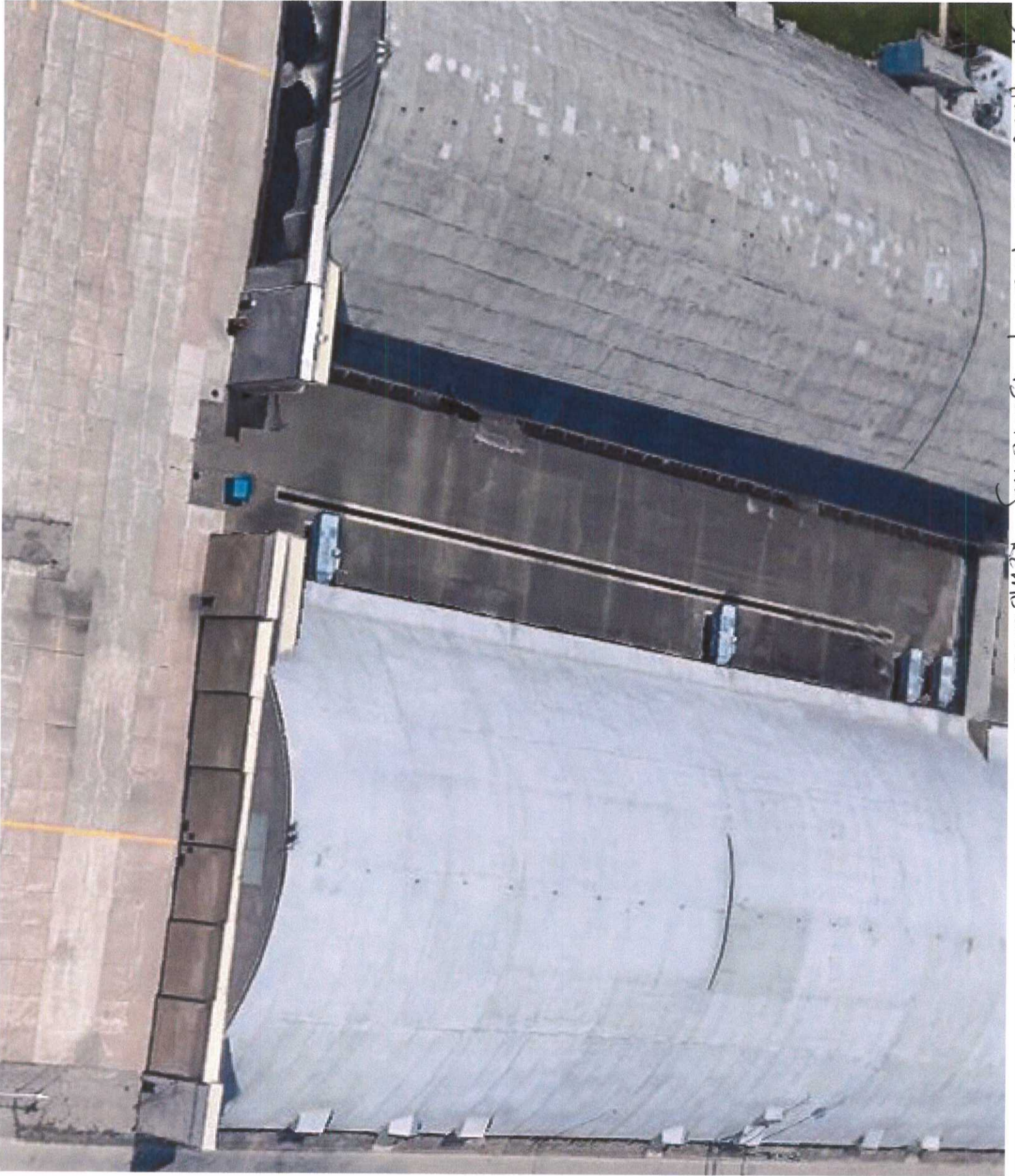
Please see the attached photographs showing the challenges of working in this extremely high and narrow area.

Respectfully,

Daniel Burgess
Environmental, Health, Safety and Facility Supervisor
3M Aviation
690 Bayfield Street
Saint Paul, MN 55107

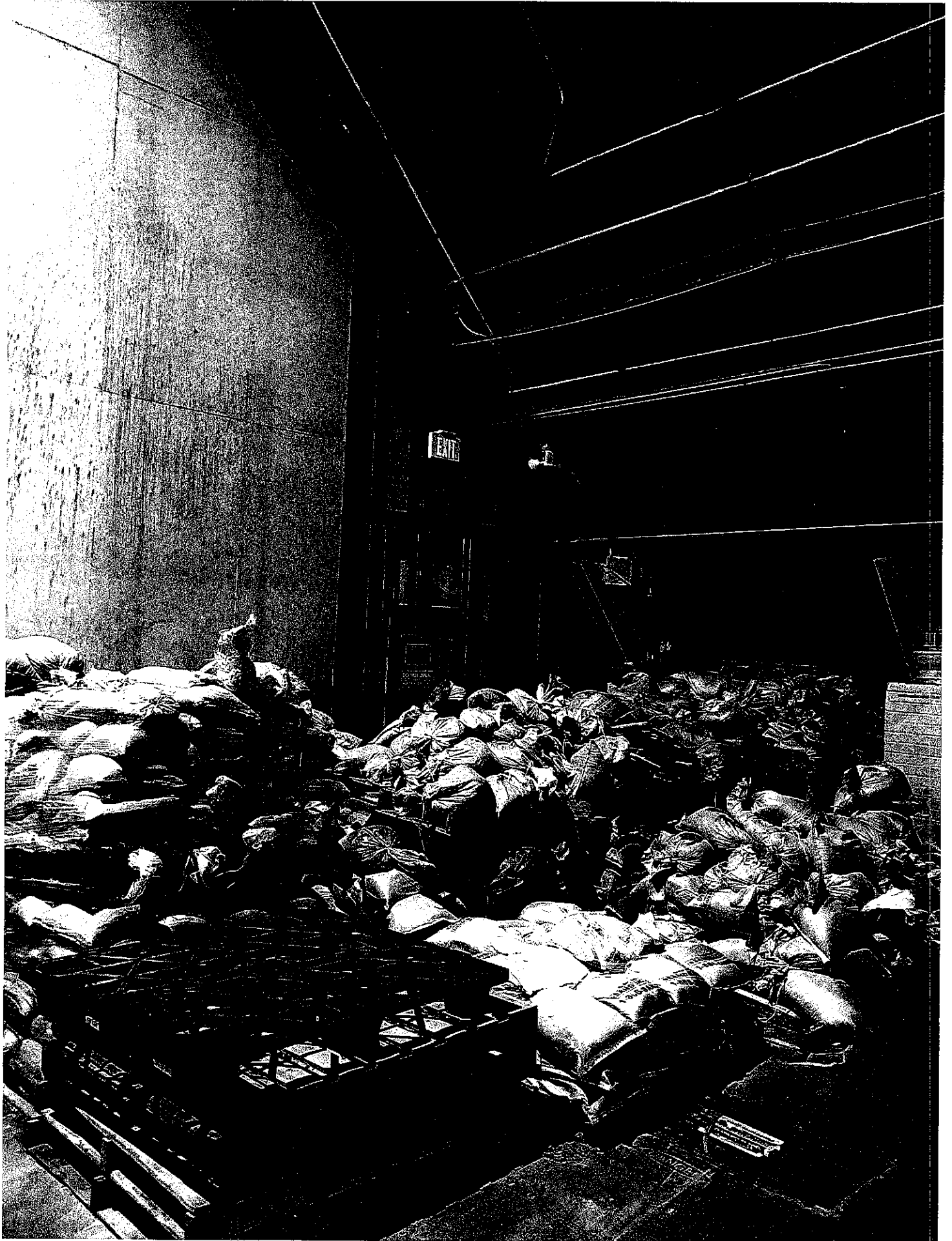
"RIVERSIDE" NOW 3M HANGARS 1965 ADMIN BUILDING BETWEEN HANGARS





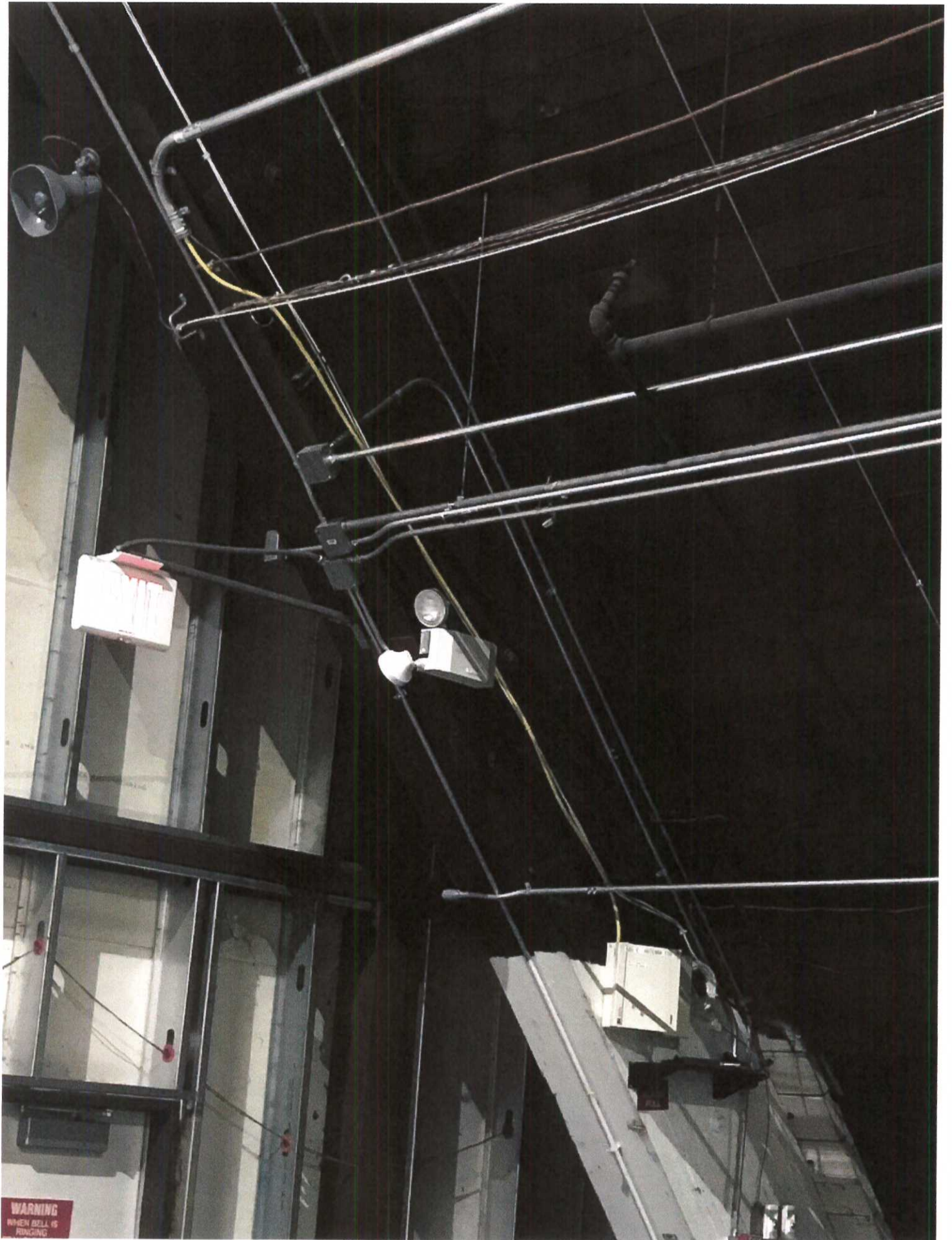
3M Haelens Today Building Removed

BLDG 680 GENERAL VIEW OF AREA



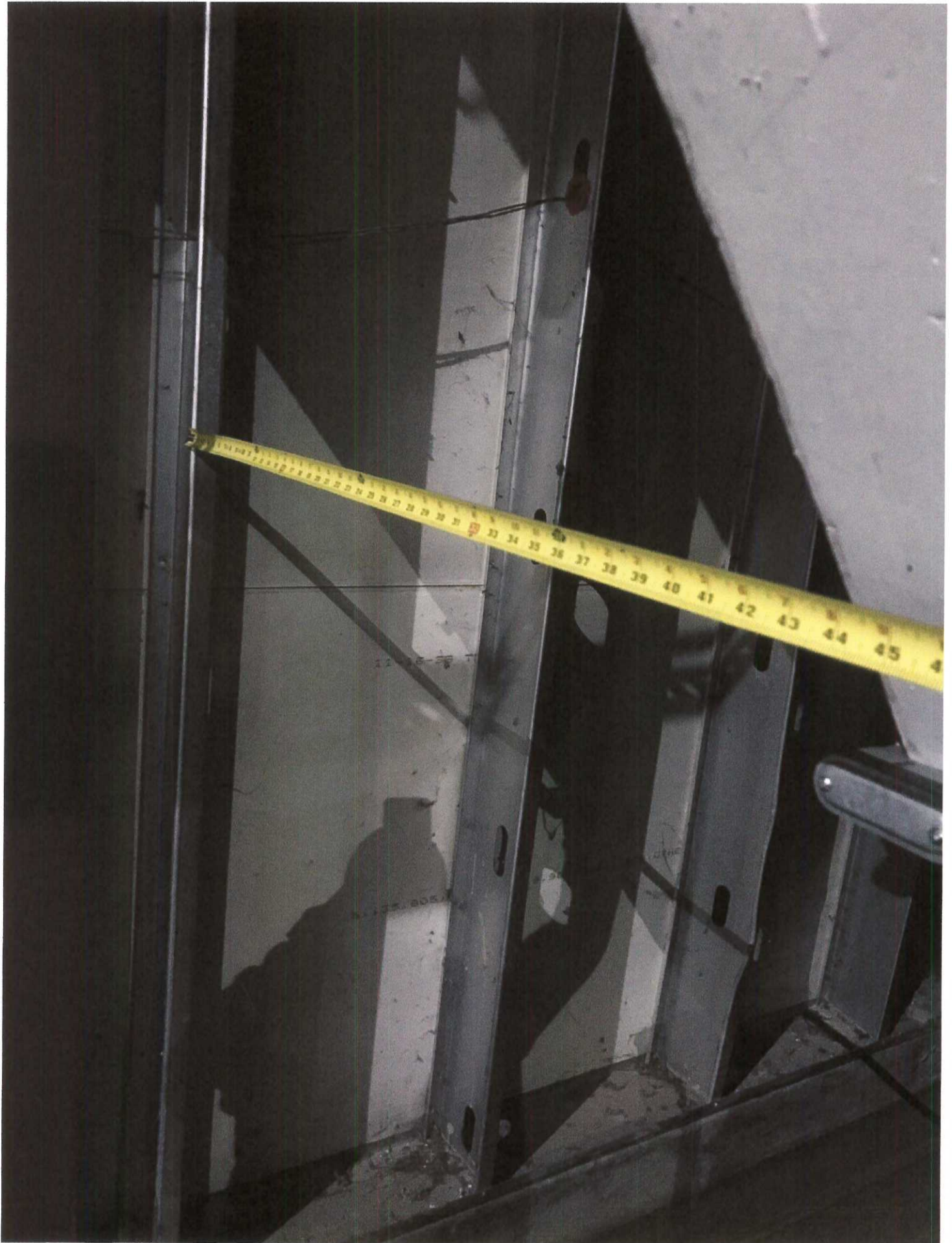
BLDG 680

FIRE PROTECTION OUTSIDE OF PODLET

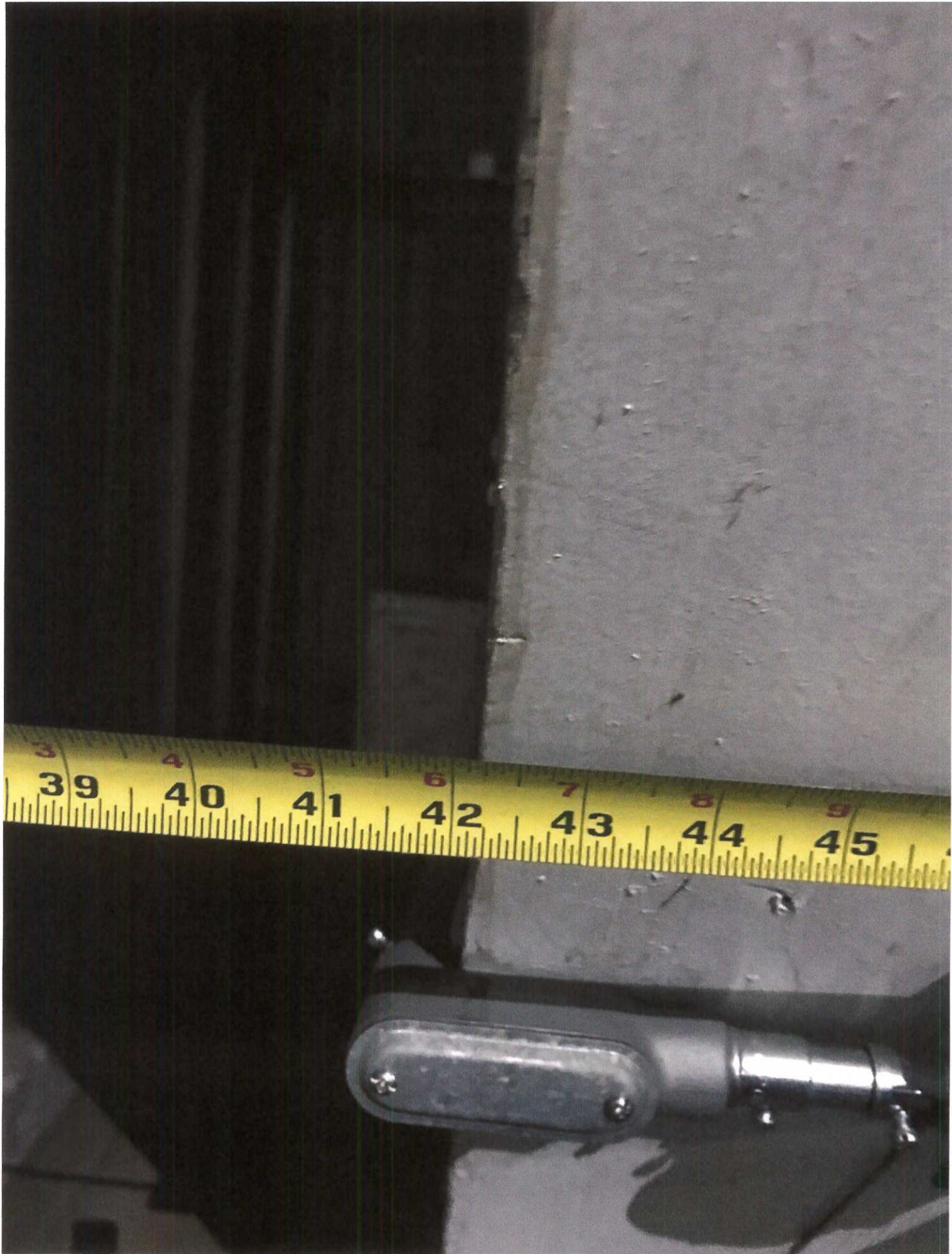


WARNING
WHEN BELL IS
RINGING

BLDG 680 WIDTH MEASURE FROM



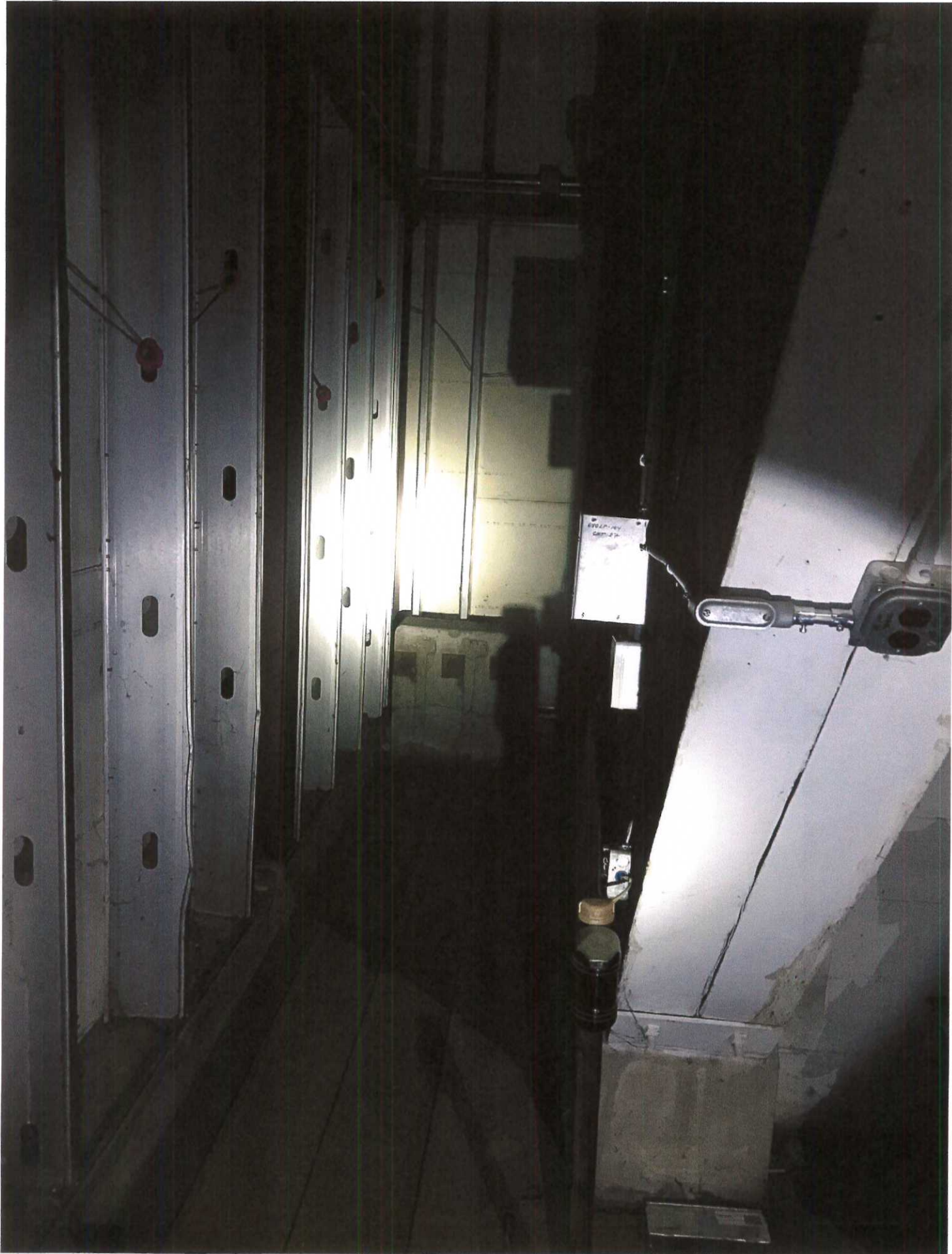
BLDG 680 Width Measure TO = 42.25 inches



BLDG 680 POCKET Height 55ft AIR CRAFT Fit Under



BLDG 680 PHOTO OF WORKSPACE



Box 690 OUTSIDE OF DOCKET



BUD 690 55 foot Height



BUDG 690 POCKET WORKSPACE



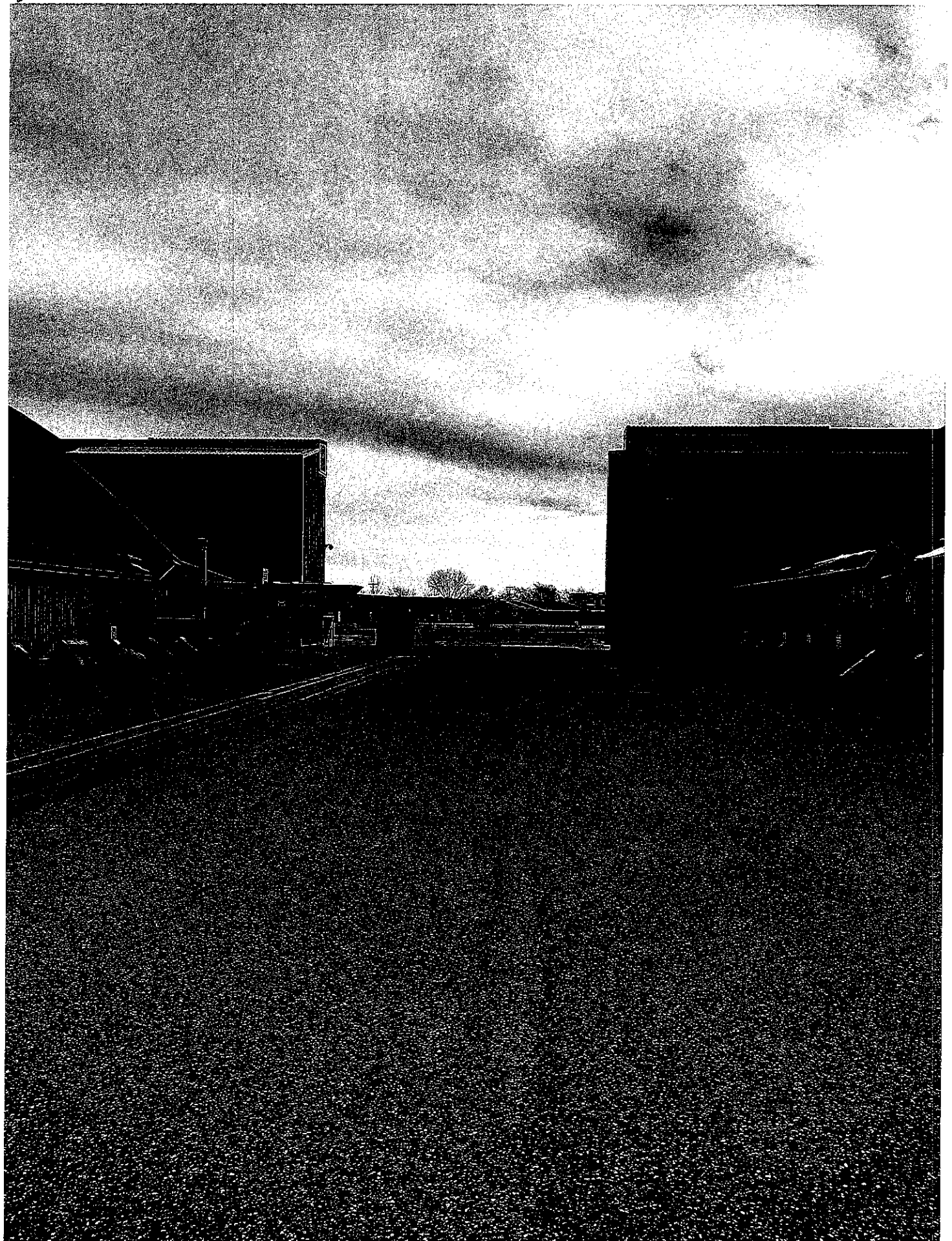
BUDG 690 EXAMPLE OF STAGLING DOORS



EXTENSION VIEW OF BOTH SPACES Dumpster in Dic is 48 in TALL



Back Side View of Both Poilet Spaces





CITY OF SAINT PAUL

375 Jackson Street, Suite 220
Saint Paul, Minnesota 55101-1806

Telephone: 651-266-8989
Facsimile: 651-266-8951
Web: www.stpaul.gov/dsi

November 10, 2021

3M AVIATION C/O DAN BURGESS
690 BAYFIELD ST
SAINT PAUL MN 55107

FIRE INSPECTION CORRECTION NOTICE

RE: 680 BAYFIELD ST
Ref. #94906

Dear Property Representative:

Your building was inspected on November 10, 2021 for the renewal of your Fire Certificate of Occupancy. Approval for occupancy will be granted upon compliance with the following deficiency list. The items on the list must be corrected prior to the re-inspection date. **A re-inspection will be made on December 14, 2021 at 11:00 a.m.**

Failure to comply may result in a criminal citation or the revocation of the Fire Certificate of Occupancy. The Saint Paul Legislative Code requires that no building shall be occupied without a Fire Certificate of Occupancy. The code also provides for the assessment of additional re-inspection fees.

YOU WILL BE RESPONSIBLE FOR NOTIFYING TENANTS IF ANY OF THE FOLLOWING LIST OF DEFICIENCIES ARE THEIR RESPONSIBILITY.

DEFICIENCY LIST

1. **East Side Green Doors** - MSFC 1031.2, 1031.3 - Remove the materials that cause an exit obstruction. Maintain a clear and unobstructed exit path. - Clean debris from door track and/or repair sticking door hardware as necessary.
2. **Fire Extinguisher Signage** - MSFC 906.1, MN Stat. 299F.361 - Fire extinguishers - Relocate or remove fire extinguisher signs that no longer correspond to the extinguisher locations. Includes in enclosed room at southeast corner and across from lobby.

3. **Southeast Corner** - MSFC 901.6 - Fire Sprinkler system has missing coverage for area where wall have been opened to the previously sealed void space at southeast corner. Seal the wall to enclose this space or provide approved sprinkler coverage if area is to be left open to main hangar.

Saint Paul Legislative Code authorizes this inspection and collection of inspection fees. For forms, fee schedule, inspection handouts, or information on some of the violations contained in this report, please visit our web page at: <http://www.stpaul.gov/cofo>

You have the right to appeal these orders to the Legislative Hearing Officer. Applications for appeals may be obtained at the Office of the City Clerk, 310 City Hall, City/County Courthouse, 15 W Kellogg Blvd, Saint Paul MN 55102 Phone: (651-266-8585) and must be filed within 10 days of the date of this order.

If you have any questions, email me at: mitchell.imbertson@ci.stpaul.mn.us or call me at 651-266-8986 between 7:30 a.m. - 9:00 a.m. Please help to make Saint Paul a safer place in which to live and work.

Sincerely,

Mitchell Imbertson
Fire Safety Inspector

Reference Number 94906



CITY OF SAINT PAUL

375 Jackson Street, Suite 220
Saint Paul, Minnesota 55101-1806

Telephone: 651-266-8989
Facsimile: 651-266-8951
Web: www.stpaul.gov/dsi

November 10, 2021

3M AVIATION C/O DAN BURGESS
690 BAYFIELD ST
SAINT PAUL MN 55107

FIRE INSPECTION CORRECTION NOTICE

RE: 690 BAYFIELD ST
Ref. #24895

Dear Property Representative:

Your building was inspected on November 10, 2021 for the renewal of your Fire Certificate of Occupancy. Approval for occupancy will be granted upon compliance with the following deficiency list. The items on the list must be corrected prior to the re-inspection date. **A re-inspection will be made on December 14, 2021 at 11:00 a.m.**

Failure to comply may result in a criminal citation or the revocation of the Fire Certificate of Occupancy. The Saint Paul Legislative Code requires that no building shall be occupied without a Fire Certificate of Occupancy. The code also provides for the assessment of additional re-inspection fees.

YOU WILL BE RESPONSIBLE FOR NOTIFYING TENANTS IF ANY OF THE FOLLOWING LIST OF DEFICIENCIES ARE THEIR RESPONSIBILITY.

DEFICIENCY LIST

1. **Emergency Light by Door 12** - MSFC 1104.5.3, 1008.3.5 - Provide and maintain an approved emergency lighting system. - Replace failing emergency light battery.
2. **Outlet 680LP-107 CKT 10** - MSFC 604.1 - Repair or replace damaged electrical fixtures. This work may require a permit(s). Call DSI at (651) 266-8989.-Replace cracked electrical outlet.
3. **Southeast Corner** - MSFC 901.6 - Fire Sprinkler system has missing coverage for area where wall have been opened to the previously sealed room/ void space at southeast

corner. Provide a wall to enclose this space or provide approved sprinkler coverage if area is to be left open to main hangar.

Saint Paul Legislative Code authorizes this inspection and collection of inspection fees. For forms, fee schedule, inspection handouts, or information on some of the violations contained in this report, please visit our web page at: <http://www.stpaul.gov/cofo>

You have the right to appeal these orders to the Legislative Hearing Officer. Applications for appeals may be obtained at the Office of the City Clerk, 310 City Hall, City/County Courthouse, 15 W Kellogg Blvd, Saint Paul MN 55102 Phone: (651-266-8585) and must be filed within 10 days of the date of this order.

If you have any questions, email me at: mitchell.imbertson@ci.stpaul.mn.us or call me at 651-266-8986 between 7:30 a.m. - 9:00 a.m. Please help to make Saint Paul a safer place in which to live and work.

Sincerely,

Mitchell Imbertson
Fire Safety Inspector

Reference Number 24895