

1 Q. Referring to Exhibit 15, Generation Planning Issues 2011 July Update, page 27, it
2 states that “...*the current Provincial Government 25,000 tons per year limitation on*
3 *SO₂ emissions from the HTGS, have traditionally been included in generation*
4 *planning studies.*” To date, have there been any exceedences of this target at the
5 Holyrood Plant?

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8 A. The 25,000 tonnes per year limitation on SO₂ emissions from HGTS was established
9 in 1988, to commence in 1991. To date, the only year that annual emissions
10 exceeded 25,000 tonnes was in 1989, when the SO₂ emissions at Holyrood totaled
11 25,900 tonnes.

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13 The current certificate of approval for Holyrood requires that the sulphur content of
14 fuel used at the facility be no greater than 0.7% by weight (please see the following
15 page). With this limitation the 25,000 tonne target will not be exceeded in the
16 future.

relevant information that would aid in later review of the plan performance. Each incident report shall be submitted to the Director as per the **Reporting** section.

Site Decommissioning and Restoration Plan

21. A plan to restore areas disturbed by the operation shall be submitted to the Director for review at least ten (10) months before the time that closure of the Thermal Generating Station is determined. For guidance on the preparation of the plan, refer to Appendix B. Wherever possible, the plan shall promote progressive reclamation of disturbed areas. HYDRO shall proceed through a phased environmental site assessment process to closure.

Heavy Fuel Oil

22. HYDRO shall analyse each delivery of Heavy Fuel Oil for the parameters listed in Table 1. Analysis shall be on a representative sample of the Heavy Fuel received.

Table 1: Fuel Analysis Program			
Parameters			Frequency
A.P.I Gravity @ 60 °F	Density (kg/m ³ @ 15 °C)	Flash Point	Every Batch Delivered
Pour Point	Viscosity cSt @ 51 °C	Viscosity SFS @ 122 °F	
Sulphur % by Weight	BTU's per US Gallon	Ash % by weight	
Sediment % by weight	Water % by volume	Asphaltenes % by weight	
Aluminum	Nickel	Silicon	
Sodium	Vanadium		

23. HYDRO shall maintain, and submit to the Director as per the **Reporting** section, a record of all Heavy Fuel received. The record shall include:
- name of the supplier;
 - date and volume of Heavy Fuel unloaded;
 - the certificate of analysis for each batch of Heavy Fuel delivery received; and
 - the name of the laboratory where the analysis was performed.
24. HYDRO is permitted to accept and burn alternative fuel only with the written approval of the Department.

Sulfur in Fuel

25. HYDRO shall not burn any fuel with sulphur content greater than **0.7 %** by weight.

Used Oil

26. Used oil shall be retained in an approved tank or closed container, and disposed of by a company licenced for handling and disposal of used oil products.
27. HYDRO shall submit a revised SOP for the handling and storage of used oil to the