
1 Q. **Re: Fuel Oil Storage Facility - Refurbishment of Tank 3**

2 With reference to Hydro's response to CA-NLH-4, has Hydro obtained the approval,
3 under section 19 of the *Storage and Handling of Gasoline and Associated Products*
4 *Regulations, 2003*, of the Department to wholly replacing manual fuel gauging,
5 dipping and reconciliation, as contemplated by section 18 of those Regulations,
6 with the proposed installation of the fuel oil indication system?

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9 A. No. The request for approval has not been formally submitted but based upon its
10 discussions with personnel at the Department of Environment, Hydro believes that
11 the improved level detection system being proposed would be acceptable because
12 it is more accurate than the existing manual method and occurs continuously.

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14 The justification for proposing this instrumentation was not primarily to offset
15 manual gauging, but to replace the original in-situ tape gauging system which has
16 been out of service for quite some time. The greatest benefit provided by
17 continuous monitoring is a greater awareness of the level in the tanks at all times.
18 This allows for improved control and condition monitoring, early detection of
19 anomalies (which could indicate a leak or passing valve) and a greater accuracy of
20 inventory records. The potential for cost saving and enhanced personnel safety are
21 additional benefits.