

1 Q. **Fuel Oil Storage Facility:** What is the Justification for the Roof Platform, Fuel Oil
2 Indication System or Access Steps components of this Project? Has any consultant
3 recommended the Roof Platform, Fuel Oil Indication System or Access Steps
4 components of this Project?

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7 A. A consultant has not been asked to recommend if the roof platform, fuel oil
8 indication system, or access steps should be included as components of this project
9 and Hydro has not received any recommendations. These components were
10 subsequently added to the project since the most recent consultant's report was
11 prepared in 2006 by SGE Acres. They are included in this project to mitigate
12 operational safety concerns that Hydro has as explained below:

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14 a) Roof Platform:

15 The roof platform is a platform that operations personnel will walk on to access
16 the dipping connections on the tank and also the hand wheel associated with
17 the internal isolation valve controlling fuel flow to the internal tank suction
18 heater. The platform includes a hand rail and has tread grip to prevent workers
19 from slipping. Without this platform workers have to walk across a smooth,
20 inclined, and sometimes slippery tank roof surface without handrails. Workers
21 often have to attend to dipping, and sometimes valve manual activation, in poor
22 weather conditions. Hydro has safety concerns for this practise.

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24 b) Fuel Oil Indication System:

25 Please refer to the response to CA-NLH-18.

1 c) Access Steps:

2 The proposed access steps will allow operations personnel to climb over the
3 spill containment dyke in a safe manner, at a point near Tank No 3, to access the
4 steps for climbing to the tank roof and also the valve house at the base of the
5 tank. Entry to the inside of the dyke during the winter used to be made by
6 driving vehicles down into the containment area from another location that
7 required snow ploughing certain areas inside the dyke. Ploughing the inside of
8 the dyke causes a high risk of damaging the new drainage system that was
9 installed in 2009. This practice has since stopped and workers have been
10 expected to climb over the dykes. The dykes are steeply inclined earth walls
11 without hand rail or steps, as shown in Figures 1 and 2 below. At the best of
12 times they are a slipping or falling hazard and this hazardous condition is
13 aggravated by poor weather.



Figure 1: Tanks 1, 2 and 3, (Tank 1 being the nearest tank.) A shift operator can be seen standing on the berm, which had to be ascended to access Tanks 1 and 2.



Figure 2: Tanks 3 and 4 and the berm to the left which must be ascended to access those two tanks.