

1 Q. **Fuel Oil Storage Facility:** With reference to Section 3, page 11 of the July 2011  
2 Hydro report, in what circumstance does Hydro anticipate a Heavy Oil Tank being  
3 "permanently out of service"? Is there any consultant analysis that supports such a  
4 circumstance as a reasonable possibility?  
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7 A. The interpretation of "permanently out of service" is a tank being out of service for  
8 a minimum time period of at least one winter peak production season. There is a  
9 variety of circumstances that would require taking a tank out of service for the  
10 duration of the winter peak production season, including:  
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- 12 a) appearance of fuel around the external perimeter of a tank at ground  
13 level;
  - 14 b) excessive sagging of a tank roof structure;
  - 15 c) malfunction of an internal isolation valve to the suction heater; and
  - 16 d) failure of an internal steam heater.
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18 A consultant has not been asked to perform an analysis to determine in their view if  
19 these circumstances are reasonable possibilities. As indicated in the response to  
20 IC-NLH-13, the loss of a tank for the purposes of the winter peak production season  
21 has already occurred, due to causes (c) and (d) above.