

1 Q. **Refurbishment of Day Tank.**

2 With reference to the 2022 CFM report (Schedule 1, Attachment 3), did CFM, by the completed  
3 required calculations from the Fifth Edition of the API 653 Section 6.4.2.2.1, or by other means,  
4 arrive at or ascribe any quantitative risk of failure, within any specified time frame, to the Day  
5 Tank?

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8 A. CFM did not determine any quantitative risk of failure within any specified time frame. The  
9 calculations provided in Newfoundland and Labrador Hydro's ("Hydro") response to IC-NLH-003,  
10 Attachment 1, show the tank floor to be below minimum thickness of 0.1 inches as per API 653<sup>1</sup>  
11 after ten years (2023). The risk of having a leak becomes significantly higher after this point and  
12 continued operation without mitigation would place Hydro in violation of its environmental  
13 Certificate of Approval.

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<sup>1</sup> *Tank Inspection, Repair, Alteration, and Reconstruction*, API Standard 653, 2014.