

1 Q. **Refurbishment of Tank 2.**

2 Would a tank inspection contractor, or other qualified consultant, be able to provide its opinion  
3 on the quantitative risk of failure of Tank 2, if the recommended inspection date was delayed to  
4 June 2024 (on the assumption that the Holyrood TGS is extended beyond March 31, 2024)?

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7 A. According to the calculations prepared by TEAM Industrial Services,<sup>1</sup> the tank floor will be below  
8 the minimum thickness of 0.1 inches as per API 653<sup>2</sup> by the middle of 2023. CFM has advised  
9 Newfoundland and Labrador Hydro (“Hydro”) that it is their opinion that based on these  
10 calculations the floor would be at an elevated risk of failure at that time. In addition to the floor  
11 calculations, there are significant issues with Tank 2’s concrete ring beam that have only been  
12 temporarily patched and not permanently repaired. CFM had indicated that it would not accept  
13 the liability to extend operation of the day tank beyond the next inspection interval date of June  
14 2023, and their position would be the same with respect to Tank 2.

15 Operation of Tank 2 beyond June 2023 would place Hydro in violation of its environmental  
16 Certificate of Approval.

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<sup>1</sup> Please refer to IC-NLH-010, Attachment 2.

<sup>2</sup> *Tank Inspection, Repair, Alteration, and Reconstruction*, API Standard 653, 2014.