

1 Q. **Reference Application Rev. 1, Volume 2, Upgrade Wastewater Equalization System - Holyrood)**

2 a. It is stated (page 4) *“The proposed completion of upgrades to the waste water equalization*
3 *system was originally incorporated into Hydro’s Capital Plan in 2014 but was deferred at*
4 *that time due to the uncertainty surrounding the future operating state of the Holyrood*
5 *TGS.”* Please explain why the project could be deferred at that time when it cannot be
6 deferred now. Was a *“long-term, cost effective solution for wastewater management and*
7 *processing”* not needed then as it is now?

8 b. It is understood that the bio-aerosol test was completed in the fall of 2016 (REL Report,
9 page 4) with results exceeding safe levels. Why has Hydro waited until 2021 to address this
10 issue?

11 c. Is it much safer for employees and members of the public to be inside rather than outside
12 the waste water storage building (REL Report page 9)?

13 d. Please identify the probability that this project will be needed for the full 25-year service life
14 assumed in the analysis (page 6).

15 e. It is understood that the Holyrood site Certificate of Approval expires on August 31, 2021
16 (page 21). What is the status of plans to extend the Certificate of Approval?

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19 A.

20 a. The 2014 project proposal included an upgrade to the ventilation system, as well as the
21 replacement of the waste water basin building. Reconsideration was given to the project
22 due to the expense associated with it and lack of surety the ventilation would control
23 humidity inside the basin building during steam operation. It was subsequently determined
24 that due to the planned end of steam operation in 2017 (at that time), it was more cost
25 effective to replace the building post steam. As the period for end of steam continued to be
26 extended and recognizing there was a continued requirement for system upgrade post
27 steam, Newfoundland and Labrador Hydro (“Hydro”) reassessed the project in 2019.

- 1 The current proposal reflects a solution that will satisfy requirements for both steam and
2 post-steam operations. Therefore, the suitability of this alternative is not impacted by the
3 operational requirements of the Holyrood Thermal Generating Station (“Holyrood TGS”).
- 4 **b.** In 2016, post-steam operations were planned to begin in 2019. The issues identified in the
5 bio-aerosol test were to be remediated under a project to replace the building once steam
6 operation had concluded. Until such time as system upgrades were executed, the use of
7 PPE¹ was implemented for workers accessing this facility. As noted in part a, as the period
8 for end of steam continued to be extended and recognizing there was a continued
9 requirement for system upgrade post steam, Hydro reassessed the project in 2019 and the
10 project currently proposed was identified.
- 11 **c.** The waste water equalization system is located inside the Holyrood TGS site and is therefore
12 not accessible to the public. Please refer to response to IC-NLH-011 for information on the
13 safety precautions used in accessing this facility.
- 14 **d.** Attachment 1, page 15, line 73 of the Department of Municipal Affairs and Environment
15 Certificate of Approval document states “HYDRO shall perform a Groundwater Monitoring
16 Program as per Table 5. This monitoring program shall be performed throughout the
17 operational life of the landfill, and during the twenty five (25) years following closure.” As
18 noted, the regulatory requirements outlined by Government necessitate the 25-year service
19 life.
- 20 **e.** A written request to extend the certificate beyond August 31, 2021 is due by March 1, 2021.
21 Hydro will submit this request by the required date.

¹ Personal Protective Equipment (“PPE”).