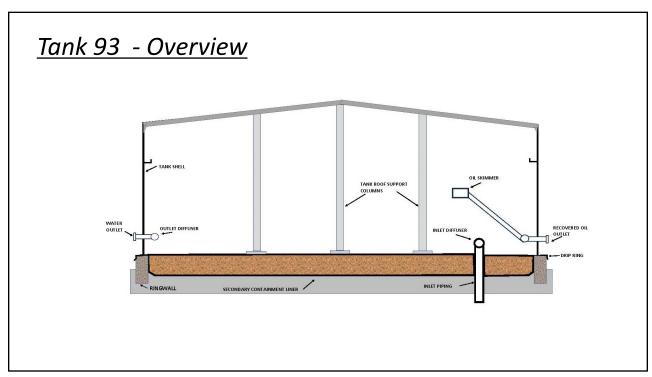
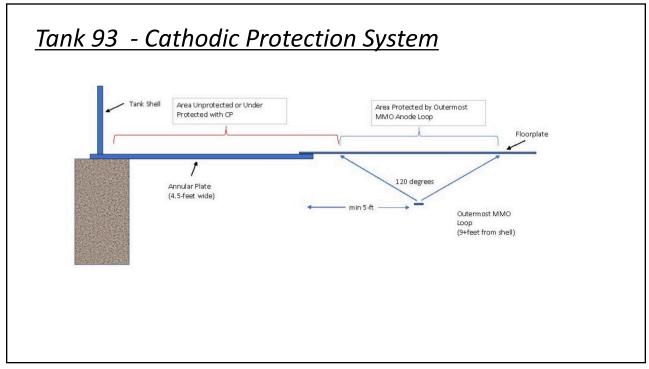


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# **Background Tank 93 Information**







### Tank 93 Floorplate Inspection Findings

- Mag-Flux Leakage (MFL) inspection
  - Identified 870 indications
- Ultrasonic Testing (UT) Follow up
  - 60 areas with less than 179 mils remaining floorplate thickness
  - 14 of the areas with less than 179 mils remaining were adjacent to the annular plate and replaced when the annular plates were replaced.
  - 46 floor plate patches were installed.
  - Deepest pit was 139 mils remaining.

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### Tank 93 Bottomside Floorplate Corrosion Rates

- APSC API 653 Out-of-Service Inspection Report
  - Bottomside corrosion rate 3.5 mpy
  - Recommended service interval > 10-years (based on annular plate replacement)
- APSC Engineering Summary Report
  - Bottomside corrosion rate 5.3 mpy (long-term corrosion rate)
  - Recommended service interval 10-years (based on annular plate replacement)
- Taku Engineering Report
  - Bottomside corrosion rate 6.9 mpy (short term corrosion rate)
  - Recommended service interval 10-years (based on annular plate replacement)

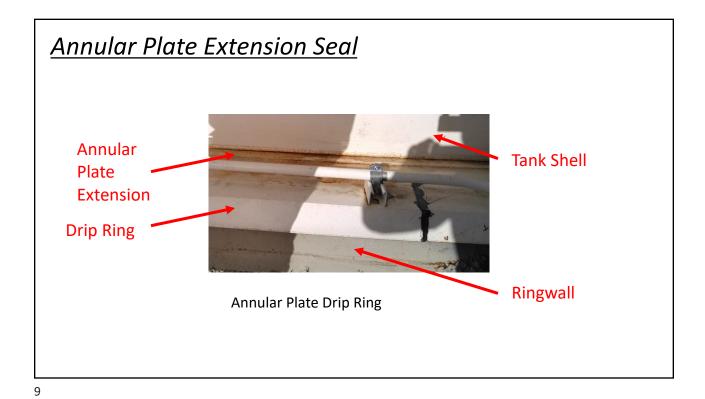
### Tank 93 CP System Monitoring

- AMPP (formerly NACE) standards call out two criteria for cathodic protection (CP).
  - A polarized potential of -850 mV (accounting for IR drop), or
  - 100 mV of polarization.
- The AMPP standard (NACE SP-0193) requires that in order to use the 100 mV criteria, the operator should measure the formation or decay of polarization.
  - APSC's internal written procedures align with the AMPP standard with regard to monitoring the formation or decay of polarization.

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### Tank 93 CP System Monitoring Issues

- None of the Tank 93 CP data meets the -850 mV criteria for CP.
- APSC is relying on 100 mV shift criteria to show that Tank 93 is cathodically protected.
  - APSC has been using depolized data as old as 9-years old in lieu of measuring the formation or decay of polarization.
- APSC is not collecting CP data in the outermost 10-feet of the tank perimeter.
  - · This is the area of the most active corrosion.
- Replacement of the annular plate, 870 MFL indications and the installation of 46 patches suggests that the CP system is not effectively protecting the tank bottom.

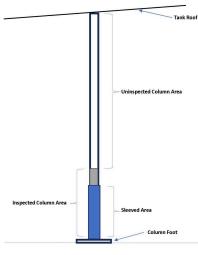


# Tank 93 Roof Support Column Inspections & Repairs

- Inspection of the roof support columns was expanded from spot readings at the bottom to comprehensive inspection of the bottom 20-feet of the columns.
- The APSC engineering summary report indicated that lower portion of each roof support column was inspected.
- Sleeves were installed on the bottom 15-feet of the outer columns.
- Internal anodes were installed in the columns

# Tank 93 Roof Support Column Inspection & Repair Issues





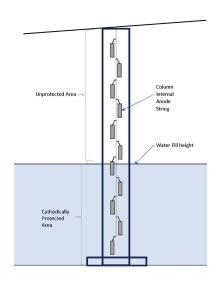
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### Tank 93 Roof Support Column Inspection Issues

- The Engineering Summary report indicated that corrosion identified on the columns was most severe at the lower portion of the columns.
  - No data was provided to support that finding.
- Values for the column minimum remaining effective structural thickness (T<sub>EST</sub>) and minimum required remaining effective structural thickness (60% T<sub>NOM</sub>) of the outer columns were provided but no calculations were provided for ascertaining those values.

## Tank 93 Roof Support Column Repair Issues

The Engineering
Summary Report States
"The internal column
anode strings are
expected to significantly
reduce the rate of
corrosion within the
columns"



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### Tank 93 Summary

- Conflicting APSC tank inspection reports
  - Creates unnecessary risk
- APSC CP collection practices
  - Not following industry standards
  - Not monitoring outermost 10-feet (location of corrosion)
- · Perimeter CP Is insufficient
  - Active corrosion on the perimeter plates
  - · Annular ring replacement was necessary due to corrosion
- Roof support column condition is not fully documented in the API 653 Report or Engineering Summary Report.

#### Tank 93 Recommendations

- Utilize the deepest floorplate corrosion as the basis for corrosion rate and service interval calculations in <u>all reports</u>.
- Adjust CP monitoring practices
  - Follow NACE SP-0193 & MP-166 3.23. Measure the formation or decay of polarization.
  - Collect CP data for the tank perimeter area (0-10 feet in from shell)
- Upgrade the perimeter CP
- · Better define the column condition
  - · Determine the condition above 20-feet
  - Provide calculations for remaining effective structural thickness (T<sub>EST</sub>) and for defining the minimum allowable remaining effective structural thickness as (60% T<sub>NOM</sub>).

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