

2.3 FREE PRODUCT RECLAMATION PROCEDURE

Product Reclamation – Steps & Sequence

2.3.1 Repair Plate Location – If liquid is detected behind a repair plate, a port will be drilled in close proximity to drain any product found at the location.
(See 2.2.3.2 for draining procedure)

2.3.2 Alternate Method: New Inspection Port Location – New locations will be determined by the QC Manager based on Section 2.1, Section 2.2.2 and the NDE data and conditions found in the tank. A port, 1/4" in diameter, will be created in the designated location with a pneumatic drill.

2.3.3 Product Reclamation-

2.2.3.1- **If no liquid is present-** WGS will test the area through the port with a gas monitor and record the readings on the QC log to be reviewed by the QC Manager to determine if further action is required.

2.2.3.2- **Liquid present-** Inspection port will be drilled and tapped to install a threaded valve to allow WGS to perform controlled draining of liquids. During tapping and threading of inspection port WGS will place oil absorbent rags below inspection port to catch any seeping liquid. A 15 gallon DOT drum will be located inside of the man basket and will be the temporary storage container until personnel return to the catwalk and material can be relocated into a larger drum or container. Once gravity flow through the valve has stopped, WGS will attempt to extract any additional accessible liquid with a small vacuum pump (5-10 Hg psig). Liquids will be collected in containers or drums to be evacuated from the tank thru the access tunnel.

2.2.3.3- WGS will track and record the amount collected and disposed of in the QC log. Testing will be performed on any collected liquids to characterize and determine proper disposal procedures, e.g., fuel reclamation or waste. Disposal location and test results will be noted in the QC log. Photos and visual characterizations will be documented in the QC daily reports.

Note –This process will begin at the top of the tank and proceed downward to limit or control the amount of liquids drained from any location where they are encountered. Based on the construction methods and historical data relating to the tank WGS does not expect to find large quantities of product in any single location of the tank. During the process described above, if WGS encounters a quantity of product that is not feasible to drain in the described method, the test/drain port will be plugged and another procedure will be developed based on the location and condition of the area where the product is found.

2.4 Product Inspection Port Repairs

Product inspection port repairs will conform to WGS Work Plan Tank 5 Repair Procedure rev 1D and the following. An area will be marked or laid out a minimum of 1" beyond the inspection port peripheral edge. The entire surface of the marked area will be cleaned to remove all existing coating or debris from the weld area. A groove will be ground into the port in accordance with the WPS joint limits, and then filled with weld, back to base metal thickness. After cleaning the filled groove, a weld overlay will be performed on the repair location. All weld overlays should extend a minimum of 1" horizontally and 1/2" vertically on either side of the affected area designated for overlay.

2.5 Summary

Willbros will perform the above procedures to identify, reclaim, or dispose of any potential free product thought to have been lost during Tank 5 filling activities. Areas identified as inspection ports during the performance of this procedure will be tracked in the QC log, which will be submitted to EXWC with the Inspection Report prior to beginning any tank repairs.

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