

## Introduction:

As per Item 1.4 of the ECA Amendment, INEOS Styrolution is submitting this written update on the site's Suspension Plan and the various benzene reduction projects occurring on site. On October 24, 2024, INEOS Styrolution announced the decision to not restart the Sarnia site before the permanent site closure by June 2026. The site's focus is now on planning and implementing a safe and compliant closure process. Our goal is continued compliance with regulatory limits and orders and we ask for MECP's continued cooperation and consideration as our plans and targets evolve. Additionally, ongoing open communications with Ministry of the Environment, Conservation and Parks (MECP), Aamjiwnaang First Nation (AFN), and Environment and Climate Change Canada (ECCC) is crucial.

INEOS Styrolution's Sarnia website ([www.ineossarnia.com](http://www.ineossarnia.com)) is a publicly accessible, transparent resource for visitors to find emissions data, press materials, FAQs, and insights into the value that INEOS Styrolution and our employees bring to the Sarnia community. All written monthly updates regarding the site's benzene reduction efforts will be maintained on this website.

## Suspension Plan:

On November 23, 2024, INEOS Styrolution submitted an updated Suspension Plan, which described the facility's current operating status and site decommission plans for 2025. INEOS Styrolution received MECP approvals for the Suspension Plan on December 19, 2024. Additionally, on January 24, 2025 INEOS received comments from the MECP on the site's updated Air Monitoring Strategy (AMS). An updated Air Monitoring Strategy was submitted on February 28, 2025.

### Repair of LDAR DOR Items:

The LDAR components on the Delay of Repair list have been repaired or are no longer leaking in the site's current depressurized, shutdown state, as per Item 1.2(e) of the ECA Amendment.

**Benzene Removal from Tank MT303:** The approved Suspension Plan included a benzene removal plan for tank which is now scheduled for April/May 2025 (previously Mar/Apr 2025). A more defined schedule will be provided one month prior to implementation; in the meantime, tank MT303 remains sealed with a vapour control system.

## Benzene Reduction Projects:

Several of the benzene reduction projects outlined in the amended ECA only provide impact on the premise of restarting. As a result, most benzene reduction projects remain on hold until site decommissioning plans are established. INEOS Styrolution's plan will ensure site closure activities are completed safely and in compliance with the regulations and Orders. Ongoing discussions with MECP will take place to understand the requirements.

### Sump Cleaning and Emissions Control:

The wastewater treatment system continues to cease normal operations. The majority of the basins continue to collect water (rainwater run-off from process and non-process areas and condensate), which is routed to a number of sumps on site. Since the plant is not operating, there is no hydrocarbon routinely or expected to enter SG202. Benzene levels in SG202 remain low, as confirmed by the latest DMAP samples. During site decommissioning, SG201 continues to collect low/no benzene containing process water and condensate from the units. The benzene levels in the wastewater sumps are currently very low (as per DMAP samples).

SG212 continues to be utilized to collect water, condensate and residual hydrocarbons that is washed from process equipment and piping for decontamination. As a result, INEOS Styrolution has successfully installed and commissioned a carbon adsorption vent gas control system on SG212 which achieves >95% hydrocarbon destruction/removal.

## 4-Week Forecast – Benzene emission-related activities:

The following activities are anticipated to occur in the month of March:

1. Continue to engage with third-party companies for planning the site decommissioning activities.
2. MT-320 (I5 Tank) Draining and Cleaning (no offsite emissions expected)
3. Tank 9 cleaning and EB transfer to MT-305D (no offsite emissions expected)
4. Glycol system to be emptied and transferred offsite (no hydrocarbon/benzene emissions impact)
5. Heat Transfer Fluid System Draining and transferred offsite
6. Reducing levels in EB tank (MT-305D), OffSpec Tanks (MT-301 and MT-212) and MT-109 by pumping materials between tanks and to railcars for offsite transfer (emission control equipment (thermal oxidizer) is in place for railcar loading; no offsite emissions expected)
7. MT-109 and MT-212 cleaning (planned for early April but providing early notification in this submittal should schedules shift and activities begin in late March; emissions control equipment will be utilized, no offsite emissions expected)
8. There may be various other small decontamination activities for low/no benzene containing equipment which are not expected to have offsite benzene emissions