

Introduction:

As per Item 1.4 of the ECA Amendment, INEOS Styrolution is submitting this written update on the site's Suspension Plan and 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. An extensive assessment was completed to evaluate site-wide ambient air quality modelling, site emissions reduction/control efforts, and overall compliance with the Environment, Conservation and Parks (MECP) benzene limits in O.Reg. 206/24. The conclusion of the assessment was that temporarily restarting the site is not operationally feasible or economically justifiable; the site's focus is now on planning and implementing a safe, responsible, 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) 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 describes the facility's current operating status and site decommission plans that will take place over the next year. Subsequently, an updated air monitoring strategy was submitted on November 30, 2024 to describe air monitoring during the decommission activities. A joint meeting with MECP, ECCC and AFN is scheduled on December 4, 2024 to review the submissions and address any questions as needed. INEOS Styrolution received MECP approvals for the Suspension Plan on December 19, 2024 and is anticipating MECP's response to the submitted air monitoring strategy in the near future.

Repair of LDAR DOR Items:

The LDAR components on the Delay of Repair list have been repaired or 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 updated Suspension Plan included a benzene removal plan for tank MT303, which is scheduled for March/April 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, benzene reduction projects remain on hold until site decommissioning plans are completed. INEOS Styrolution's plan will ensure site closure activities are completed safely, responsibly, and compliant 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 are currently 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. This is expected to continue during the site decommissioning. As a result, INEOS Styrolution is committed to installing emissions control equipment to minimize benzene emissions from this sump vent:

	Milestones	Status	Expected Completion Date
1	Complete design, sizing and order equipment.	In Progress	February 28, 2025
2	Complete Process Safety Hazard Review and MOC reviews.	Incomplete	
3	Update carbon breakthrough monitoring program.	In Progress	
4	Install carbon beds with at least 95% destruction efficiency to SG-212 sump vent, with spare carbon available as needed.	Incomplete	

Details regarding the SG-212 emissions reduction project was provided in the updated Suspension Plan submittal to meet PCIS requirements.

Cleaning out the wastewater sumps is included in the site decommissioning plans; technical assessments and emissions control solutions must be identified and installed such that benzene emissions are sufficiently reduced to meet compliance limits. INEOS Styrolution is engaging with third-party companies to understand the options for this complex activity.

4-Week Forecast – Benzene emission-related activities:

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

1. Continue to engage with third-party companies for planning the site decommissioning activities.
2. Remove solid material from Frac Tanks.