

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 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) 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 and approved by the MECP on April 11, 2025.

Repair of LDAR DOR Items:

There are no LDAR components on site Delay of Repair list and no leaking components per Item 1.2(e) of the ECA Amendment in the site's shutdown mostly decontaminated state. Routine site LDAR monitoring were conducted in April and OGI tank inspections were completed April and June.

Benzene Removal from Tank MT303: Benzene Tank MT-303 is empty and considered to be Out-of-Service per regulatory definitions/requirements.

Benzene Reduction Projects:

The benzene reduction projects outlined in the amended ECA only provided impact on the premise of restarting. As a result, most benzene reduction projects have been halted such that the site can focus on site decommissioning and overall benzene removal. Discussions with MECP, ECCC and AFN are ongoing to provide effective communication and notifications of decommissioning and benzene removal activities.

Sump Cleaning and Emissions Control:

The wastewater treatment system continues to cease normal operations. The majority of the basins and sumps continue to collect water (rainwater run-off and condensate). Since the process equipment is shutdown and decontaminated, there is no hydrocarbon routinely entering or expected to enter the process sewer system. Process sumps SG201, SG202 and SG212 have been cleaned and no longer contain hydrocarbons/benzene. SG212 is still operated with a carbon adsorption vent gas control system which achieves >95% hydrocarbon removal. INEOS expects the most recent DMAP sampling results to confirm there is no longer benzene in the sump. If so confirmed and with MECP approval, INEOS intends to remove the control system from SG212.

Previous Month Completed Benzene emission-related activities:

The following activities were completed in October:

1. Process sewer cleaning, including SG-212, has been completed and there are no longer detectable levels of benzene in the water. No elevated offsite emissions resulted from this cleaning activity.
2. Sealed vacuum boxes continue to be removed from the site

4-Week Forecast – Decommissioning-related activities:

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

1. Final vacuum boxes will be removed from the site.
2. The site will proceed with removal of small, stored chemicals (paints, lube oils, grease, etc) which have negligible/no benzene-containing materials.
3. INEOS will submit the site closure plan to revoke the site Air ECA and remove the site registration to the PCIS from the Ministry's Technical Standards Registry