

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:

Several of 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. INEOS Styrolution's plan will ensure site closure activities are completed safely and in compliance with the regulations and Orders. 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. Benzene levels in SG201 and SG202 remain low, as confirmed by the latest DMAP samples. SG212 continues to be utilized to collect water, condensate and residual hydrocarbons that is washed from process equipment and piping during decontamination. SG212 is operated with a carbon adsorption vent gas control system which achieves >95% hydrocarbon removal. Site sumps/sewers with residual hydrocarbons are in the process of being cleaned and will continue through September.

Previous Month Completed Benzene emission-related activities:

The following activities were completed in August:

1. MT-301 cleaning was completed utilizing a thermal oxidizer to control emissions. No elevated offsite emissions resulted from this cleaning activity. Headspace testing and subsequent TO removal will be completed to document tank's out of service status per regulatory definitions/requirements.
2. Removal of glycol from site system/equipment was completed in August. Remaining glycol onsite will be utilized for winterization. Glycol is not a hydrocarbon and contains no benzene.
3. Draining of Heat Transfer Fluid was completed. There are no benzene emissions from this material/activity.

4-Week Forecast – Decommissioning-related activities:

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

1. Degassing and cleaning of MT-401 will begin in early September and will utilize a thermal oxidizer to control emissions. No offsite benzene emissions expected.
2. Cleaning of process sumps and sewers began in July and will continue into September. Low concentrations of hydrocarbons in sludge/solids in the bottoms of the sumps and sewers are being removed/cleaned utilizing a robust combination of emissions controls and methods (ex: thermal oxidizer, carbon scrubbing system, sealed vacuum systems, etc.). No off-site emissions have been observed for July and August sewer cleaning activities and none are expected for the remainder of the cleaning activities in September.
3. The site continues to complete various other small decontamination for low/no benzene containing equipment and engage with third-party companies for coordination of site decommissioning activities.