

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) 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:

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. Routine site LDAR monitoring and OGI tank inspections began in April and was completed May 28. The leaks identified were either repaired according to the leak repair timelines as required in Table 7-43: Leak Repair of the PCIS or are being removed from service during the upcoming site decontamination.

Benzene Removal from Tank MT303: Part A and Part B of the Benzene Removal Plan for MT-303 were completed in May 2025. MT-303, the site's last remaining benzene storage tank, was effectively degassed and cleaned without off-site Benzene impact. MT-303 is now empty and based on regulatory definitions considered to be Out-of-Service.

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 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 plant is not operating, there is no hydrocarbon routinely or expected to enter SG202. 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 destruction/removal.

Previous Month Completed Benzene emission-related activities:

The following activities were completed in May:

1. MT303 Part A and Part B benzene removal was completed in May with no off-site emission impact.
2. MT320 EB flushing/cleaning was completed in May
3. Tank 9 bottoms material removal completed in May.
4. MT307C tank residue material removal completed in May.
5. Completed work to reduce levels in EB tank (MT-305D) and Off-Spec Tanks (MT-301) by pumping materials between tanks and transferring offsite via railcar or pipeline. Thermal oxidizer control was utilized for railcar loading; no offsite benzene emissions occurred.

4-Week Forecast – Decommissioning-related activities:

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

1. Decontamination for the Process equipment/piping and Tank Farm piping will begin in June using a closed decontamination system. This closed system will be used to drain and steam the equipment/piping utilizing the site flare to control emissions. A Third-party company, along with site resources, will be assisting with this decon. No offsite emissions are expected during this activity. Since much of the equipment has been idled/shutdown for over a year, there is a small risk of deterioration (seal degradation, corrosion, etc) which could result in fugitive emissions or leaks during the decon process. The site has made extensive efforts to pressure test and leak check equipment where possible to minimize this risk such that no offsite emissions occur.
2. Transfer of EB Flush Material from various tanks/equipment to MT-301 off-spec tank. No offsite benzene emissions expected.
3. Glycol removal to continue in June and July. There are no benzene emissions from this material/activity.
4. Continue draining Heat Transfer Fluid System (will continue through July/Aug) and transfer offsite (No emission impact expected). There are no benzene emissions from this material/activity.
6. Degassing and cleaning of MT-301 and MT-401 is planned to begin in July and August. Depending on how the Site Process and Piping Decon proceeds, degassing of MT-301 may begin in June. Thermal oxidizer control will be in place; no offsite benzene emissions expected.
7. Continue to engage with third-party companies for coordination of site decommissioning activities.
8. There may be various other small decontamination activities for low/no benzene containing equipment which are not expected to have offsite benzene emissions.