

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:

The LDAR components on the site's 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 have either been repaired or removed from service as part of the site's decommissioning process.

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 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 removal. Site sumps/sewers with residual hydrocarbons are planned to be cleaned in July and August.

Previous Month Completed Benzene emission-related activities:

The following activities were completed in June:

1. The primary focus for the site in June has been on the Decommissioning/Decontamination of the site process equipment/piping and Tank Farm piping which occurred from June 2nd to June 13th, 2025. A significant amount of equipment was brought to site and connected to the existing systems to provide an enclosed, safe system for the removal of hydrocarbons. At the end of the decommissioning (June 11-13), there were a few eGC benzene exceedances related to cumulative impact of various activities and emissions sources: Fugitives, Flaring, Tank Breathing and Hot Water into the sewer. Despite the spikes of elevated emissions at the end, the Decon was overall successful and the process equipment and majority of piping and tank farm are fully decommissioned.
2. Decon/Hydrocarbon-Containing Flush Materials from site process equipment, piping and tanks were to transferred to MT-301 off-spec tank.

4-Week Forecast – Decommissioning-related activities:

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

1. Minor flushing and decontamination of residual hydrocarbons in a Styrene 1 pipe system will occur in July. Vacuum trucks and vent gas control equipment are planned to control emissions of these activities. No offsite benzene emission anticipated.
2. Degassing and cleaning of MT-301 and MT-401 (both with IFR controls) is planned to begin in July and August. Thermal oxidizer control will be in place for the MT-301 and MT-401 tank degassing; no offsite benzene emissions expected. To reduce benzene emissions related to normal breathing losses of the tank, the site is working to connect a thermal oxidizer to the roof vents of MT-301. This work is being expedited and planned to be completed before July 5 and will support benzene emissions reductions until the MT-301 degassing can be completed later in July/August.
3. Cleaning of process sumps and sewers are planned for July and August. Low concentrations of hydrocarbons in sludge/solids in the bottoms of the sumps and sewers will be removed/cleaned utilizing emissions reducing methods and controls. Planning for these sewer cleaning activities are ongoing.
4. Glycol removal will continue in July and into August. There are no benzene emissions from this material/activity.
5. 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. Continue to engage with third-party companies for coordination of site decommissioning activities.
7. There may be various other small decontamination activities for low/no benzene containing equipment which are not expected to have offsite benzene emissions.