

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 will begin in April and will proceed into May. If leaks are identified, they will be repaired according to the leak repair timelines as required in Table 7-43: Leak Repair of the PCIS.

Benzene Removal from Tank MT303: The approved Suspension Plan included a benzene removal plan for the tank which was scheduled to begin in April 2025 (Benzene removal to Nova started on Apr 19 and will end on Apr 25; the next transfer will start on May 5, with plans to land the IFR on May 6). Part A of the benzene removal plan (De-inventory Bulk Volume above Internal Floating Roof Height) is now largely complete. MT-303 Tank level was maintained above internal floating roof (IFR) height with the thermal oxidizer (TO) connected.

Preparatory work associated with Part B of the benzene removal plan (Benzene Removal below Internal Floating Roof Height) has begun. This preparatory work involves establishing equipment connections, TSSA inspections, and Pre-Startup Safety Reviews prior to the tank roof being landed. The Part B benzene pumping and subsequent roof landing will begin on **May 6, 2025**. The 24-36 hours following roof landing will have the highest potential of increased emissions and when it is most critical that continuous pumping of the benzene occurs (Steps 6-8 of the Part B Benzene Removal Plan). Once the bulk benzene is removed, low partial pressure liquid will be added to the tank (Step 9 of the plan - approx. May 6). Low partial pressure liquid that is soluble with the benzene (diesel and/or EB) will lower the partial pressure of the liquid mixture remaining in the tank and remove/minimize the potential for benzene emissions. The Low partial pressure liquid "wash" will last approximately 2-3 days (Steps 10-12 of the plan). The final steps of the degassing (Steps 13-15 of the plan) will occur over approximately one week. The TO will continue to be in service and controlling emissions throughout each step of Part B benzene removal.

Modeling for Part B of the MT-303 benzene removal indicate that offsite POI concentrations will be below 27 ug/m3 throughout each step of this multi-day planned activity.

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 from 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 are completed in April:

1. MT-109 and MT-212 degassing was completed in April. The tanks were tested to verify hydrocarbon removal without the use of mechanical ventilation. The TO was disconnected and the tanks are now empty and naturally ventilated. No off-site emissions exceedances occurred during the tank degassing work.
2. Tank 1 solids removal was completed; no offsite emissions or eGC exceedances were observed.
3. MT320 EB flushing/cleaning progressed in April and will be continue into May.
4. Ongoing removal of Tank 9 bottoms material and transfer to MT305D with vac trucks
5. Heat Transfer Fluid System Draining began in April and will continue into the coming months.
6. MT307C tank residue bulk material removed. Residual material from the tank is planned to be removed in May. No emission impact expected since material is very low vapor pressure & contains no/very low benzene.

4-Week Forecast – Decommissioning-related activities:

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

1. MT320 EB flushing/cleaning will continue in May and the material transferred to MT-301 off-spec tank.
2. Transfer of EB Flush Material from various tanks/equipment to MT-301 off-spec tank. No offsite benzene emissions expected.
3. Continue removing bottoms material in Tank 9 and transfer to MT305D (with vac trucks). No offsite benzene emissions expected.
4. Due to equipment availability and resources, Glycol removal scheduled for April is now planned for May and June (and perhaps July). 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 work to reduce levels in EB tank (MT-305D) and Off-Spec Tanks (MT-301) by pumping materials between tanks and transfer offsite via railcar or pipeline. Thermal oxidizer control is in place for railcar loading; no offsite benzene emissions expected.
7. Remove residual material from MT307C. No emissions impact expected since material is very low vapor pressure & contains no/very low benzene).
8. MT303 Part B benzene removal to begin and be completed in May (details of plan communicated in Suspension Plan and during joint communication meetings/slides).
9. Work will begin to construct the closed decontamination system that will be used for the Process Unit Decontamination in June. This closed system will be used to drain and steam the equipment/piping such that hydrocarbons (including benzene) are removed from the site. No emission impact expected.
10. Continue to engage with third-party companies for coordination of site decommissioning activities.
11. There may be various other small decontamination activities for low/no benzene containing equipment which are not expected to have offsite benzene emissions.