

AMENDMENT TO ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 6254-9LVQ3V

Notice No. 3

Issue Date: October 25, 2024

Imperial Oil Limited
602 Christina St S
Post Office Box, No. 3004
Sarnia, Ontario
N7T 7M5

Site Location: 602 Christina Street South
Sarnia City, County of Lambton

You are hereby notified that I have amended Approval No. 6254-9LVQ3V issued on October 15, 2015 for a hydrocarbon and chemical products manufacturing facility , as follows:

The definition of "Equipment with Specific Operational Limits" in Environmental Compliance Approval Number 6254-9LVQ3V issued October 15, 2015, as amended by Notice No.1 issued June 14, 2024 and Notice No.2 issued July 26, 2024 is removed and replaced with the following:

"Equipment with Specific Operational Limits" means all *Equipment* listed in Schedule "B", including incinerators F-3300 and F-3301, boiler F-507, gas turbine generator GTG, heat recovery steam generator HRSG, SPEC dock thermal oxidizer, Area 3 benzene rail loading rack thermal oxidizer, TK-4030 thermal oxidizer, SPEP Flare thermal oxidizer and any *Equipment* related to the thermal oxidation of waste or waste derived fuels, fume incinerators or any other *Equipment* that is specifically referenced in any published *Ministry* document that outlines specific operational guidance that must be considered by the *Director* in issuing an *Approval*.

The following definition has been added to Environmental Compliance Approval Number 6254-9LVQ3V issued October 15, 2015, as amended by Notice No.1 issued June 14, 2024 and Notice No.2 issued July 26, 2024:

"Short Term Thermal Oxidizers" means the TK-4030 thermal oxidizer and SPEP Flare thermal oxidizer as described in Schedule "B".

all other definitions in the *Approval* remain unchanged.

Term and Condition No. 11 of Environmental Compliance Approval Number 6254-

9LVQ3V issued October 15, 2015, as amended by Notice No.1 issued June 14, 2024 and Notice No.2 issued July 26, 2024 is removed and replaced with the following:

11. THERMAL OXIDIZER OPERATION DURATION

1. The *Company* shall cease operation of the *Thermal Oxidizers* by December 31, 2025.
2. The *Company* shall cease operation of the *Short Term Thermal Oxidizers* by December 31, 2024.

all other Terms and Conditions in the *Approval* remain unchanged.

The following equipment has been added to Schedule "B" Equipment with Specific Operational Limits:

TK-4030 Thermal Oxidizer

- one (1) propane or natural gas fired thermal oxidizer to control emissions during the commissioning of TK-4030 for benzene service, having a maximum heat input of 3.17 gigajoules per hour (3,000,000 british thermal units per hour), exhausting into the atmosphere at a volumetric flow rate of 0.77 cubic metres per second, via a stack having an exit diameter of 0.51 metres, extending 4.1 metres above grade;

SPEP Flare Thermal Oxidizer

- one (1) propane or natural gas fired thermal oxidizer to control emissions from the Sarnia Polyethylene Plant (SPEP) during the installation of a continuous emission monitoring system (CEMS) on the SPEP Flare, having a maximum heat input of 7.39 gigajoules per hour (7,000,000 british thermal units per hour), exhausting into the atmosphere at a volumetric flow rate of 0.86 cubic metres per second, via a stack having an exit diameter of 0.51 metres, extending 4.1 metres above grade;

all other equipment listed in Schedule "B" remain unchanged.

Reason No. 9 of Environmental Compliance Approval Number 6254-9LVQ3V issued October 15, 2015, as amended by Notice No.1 issued June 14, 2024 and Notice No.2 issued July 26, 2024 is removed and replaced with the following:

9. THERMAL OXIDIZER OPERATION DURATION

Condition No. 11 is included to set a timeline before a permanent solution to control emissions from loading benzene onto marine vessels and rail cars will be developed

and to set a timeline for short term equipment commissioning processes.

all other Reasons in the *Approval* remain unchanged.

All in accordance with the Environmental Compliance Approval application dated September 4, 2024 and signed by Lisa Desantis, Environmental & Process Safety Leader, the memos titled "Emissions Screening Assessment of Temporary Thermal Oxidizer for TK4030" dated October 1, 2024 and "Emissions Screening Assessment of Temporary Thermal Oxidizer for the Aromatics Unit" dated October 18, 2024, prepared by ORTECH Consulting Alliance Inc., the email from Andrew McLeod/Imperial Oil Limited dated October 1, 2024 email and the documents titled "Community Noise Impact Assessment - Temporary Thermal Oxidizer - Area 3 North Benzene Tank TK-4030" dated September 16, 2024 and "Community Noise Impact Assessment - Temporary Thermal Oxidizer - Area 3 SPEP Flare" dated September 23, 2024, prepared by Mervyn Choy/Hatch Ltd.

This Notice shall constitute part of the approval issued under Approval No. 6254-9LVQ3V dated October 15, 2015

In accordance with Section 139 of the *Environmental Protection Act*, you may by written notice served upon me and the Ontario Land Tribunal within 15 days after receipt of this Notice, require a hearing by the Tribunal. Section 142 of the *Environmental Protection Act* provides that the Notice requiring the hearing shall state:

- a. The portions of the environmental compliance approval or each term or condition in the environmental compliance approval in respect of which the hearing is required, and;
- b. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

Pursuant to subsection 139(3) of the *Environmental Protection Act*, a hearing may not be available with respect to any terms and conditions in this environmental compliance approval, if the terms and conditions are substantially the same as those contained in an approval that is amended or revoked by this environmental compliance approval.

The Notice should also include:

1. The name of the appellant;
2. The address of the appellant;
3. The environmental compliance approval number;
4. The date of the environmental compliance approval;
5. The name of the Director, and;
6. The municipality or municipalities within which the project is to be engaged in.

And the Notice should be signed and dated by the appellant.

This Notice must be served upon:

Registrar*
Ontario Land Tribunal
655 Bay Street, Suite 1500
Toronto, Ontario
M5G 1E5
OLT.Registrar@ontario.ca

and

The Director appointed for the purposes of Part
II.1 of the *Environmental Protection Act*
Ministry of the Environment, Conservation and
Parks
135 St. Clair Avenue West, 1st Floor
Toronto, Ontario
M4V 1P5

*** Further information on the Ontario Land Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349 or 1 (866) 448-2248, or www.olt.gov.on.ca**

The above noted activity is approved under s.20.3 of Part II.1 of the *Environmental Protection Act*.

DATED AT TORONTO this 25th day of October,
2024



Nancy E Orpana, P.Eng.
Director
appointed for the purposes of Part
II.1 of the *Environmental Protection Act*

MS/
c: District Manager, MECP Sarnia
Andrew McLeod, Imperial Oil Ltd