

CEPA E2 Emergency Preparedness

In 2019, the Canadian federal government updated the *Canadian Environmental Protection Act Environmental Emergencies Regulation*, more commonly referred to as CEPA E2. As part of these updated regulations industrial facilities using or storing regulated substances are required to communicate with members of the public who may be affected in the event of an environmental emergency. The intent of the public notification is to create awareness of the possibility of an environmental emergency, the community notification process and the prevention and safety measures in place before, during and after an environmental emergency.

Our commitment to safe, reliable operations

Safety leadership is fundamental to our business and a key driver in keeping our workforce safe and healthy. We're relentless in our pursuit of safety so every employee and contractor goes home from work each day the way they arrived. We'll never stop working toward our goal of **Nobody Gets Hurt.**

The same safety mindset applies to our commitment to our neighbours and the communities where we operate. In the event of an environmental emergency, our operating sites and facilities have well-defined plans, trained personnel and access to equipment to respond immediately to any incident.

Being prepared is critical. We conduct a series of simulated emergencies each year to ensure a constant state of readiness and emergency response capability. These range from fire drills and equipment and personnel tests at local operating sites, to computer-simulation exercises, and full-scale simulations. We often engage with key stakeholders in these drills and simulations.

Environmental Emergencies

The environmental emergencies that may affect members of the public are the release of highly flammable gases (e.g., butane and liquefied petroleum gases (LPG)) from our spheres or bullets and a liquid hydrocarbon release from one of our storage tanks. The release of these substances could result in a fire and/or blast at the Nanticoke Refinery.

While it is a possibility that an environmental emergency could occur, based on our commitment to safe, reliable operations and the prevention and safety measures we have in place, we consider it unlikely these environmental emergencies will occur at the Nanticoke Refinery.

Our prevention and safety measures

Imperial has well-established prevention and safety measures in place to protect the public in the unlikely event of an environmental emergency at one of our sites or facilities. These include, but are not limited to:

- An operations integrity management system that helps us mitigate risks associated with our operations to protect people and the environment
- A behavioural-based safety program to keep our workforce safe
- Equipment maintenance procedures and training for personnel
- · On-going risk evaluation associated with the products we manufacture, use and dispose of
- On-going training for all operations and maintenance personnel, which includes safe start-up, shutdown, emergency and other response procedures
- · A quality assurance program for materials on site
- A network of high-technology surveillance and control instruments



- 24-hour monitoring of the process by qualified operators
- · A mechanical integrity program that meets industrial standards
- 24/7 emergency response team support, including equipment and emergency response plans/procedures tested with regular emergency training, drills and exercises
- Mutual Aid Partnerships with surrounding companies and municipal emergency responders
- On-going dialogue with our neighbours and the surrounding community
- The Nanticoke Refinery has an emergency warning system consisting of a series of air horn alarms to alert our personnel of potential emergencies at the site. These alarms are tested weekly, every Tuesday at 12:30 p.m.

If an incident occurs

In the event of an environmental emergency at our Nanticoke Refinery, you may notice additional noise, odours, flaring, smoke, fire, etc. The potential effects may include heat exposure, respiratory or auditory issues.

In the event of an environmental emergency, we immediately notify Haldimand County. Haldimand County has the responsibility of alerting potentially affected public and advising them of what action to take. They will provide the relevant details and facts such as:

- The nature and location of the incident
- Information and guidance concerning the actions that could be taken by the public to reduce the potential harm to human health and the environment
- Details regarding any road closures or reduced community access
- · Steps being taken to address the incident

In the case of an emergency Haldimand County recommends that the public follow them on Twitter (@HaldimandCounty or @HaldEmerg) and Facebook (https://www.facebook.com/HaldimandCounty/). We strongly encourage the community to follow the direction from local authorities.

After an Environmental Emergency

After an emergency, depending on the circumstances of the incident, the Nanticoke Refinery and/or the Haldimand County may conduct additional public communications regarding next steps as appropriate. These public communications may include:

- Social media updates
- Media interviews
- Website updates

Contact us

It's important our neighbours are updated before, during and after an emergency. If you have specific questions, please contact us:

- o Community inquiries: 519-339-4015 or email kristina.zimmer@esso.ca
- o 24-hour line: 519-587-7000