



PRIS / PCIS Part X – Complaints, Records and Reporting

Imperial Oil, Downstream & Chemical

Sarnia Complex

March 31, 2025

# 2024 Annual Summary Tables & Ambient Monitoring Report

## Introduction

The annual summary tables included in this report were developed in accordance with the requirements of Part X, subsection 65(2), paragraphs 1 & 8 of both the Petroleum Refining and Petrochemical Industry Standards under the Technical Standards to Manage Air Pollution. A copy of the report mentioned in subsection 65(2), paragraph 6 has also been included in this annual report per the requirements of subsection 66(1), paragraph 3 of the same standards. The scope of the annual summary tables includes both Imperial Oil's Sarnia Refinery and Chemical Plant (Sarnia Complex).

## Section 65 (2) Paragraph 1 - Implementation Summary Table

Part	Title	Section	Sub Part	Date Required	Date Complete
PART II – PERFORMANCE	Flare	5	1	01/01/2020	01/01/2020
PART III – STORAGE VESSELS	Storage vessels – identification	9	1 & 2	28/07/2017	28/07/2017
PART III – STORAGE VESSELS	Storage vessels – identification	9	3 & 4	28/07/2017	28/07/2017
PART III – STORAGE VESSELS	Storage vessels – identification	9	5(1-2)	01/01/2018	28/07/2017
PART III – STORAGE VESSELS	Storage vessels – identification	9	5(3)	01/01/2025	01/01/2025
PART III – STORAGE VESSELS	Storage vessels – identification	9	7	01/01/2023	01/01/2023
PART III – STORAGE VESSELS	Storage vessels -application	10	1	01/01/2018	28/07/2017
PART III – STORAGE VESSELS	Storage vessels -application	10	4(b)	01/01/2025	N/A
PART III – STORAGE VESSELS	Floating roof -requirement to float	11	1	28/07/2017	28/07/2017
PART III – STORAGE VESSELS	Floating roof -requirement to float	11	3	28/07/2017	28/07/2017
PART III – STORAGE VESSELS	Deck covers – requirement to be closed	15	1	28/07/2017	28/07/2017
PART III – STORAGE VESSELS	Floating roof -visual inspection	16	1	01/01/2023	01/01/2023
PART III – STORAGE VESSELS	Storage vessels -OGI inspection	17	1	01/01/2018	01/01/2018
PART III – STORAGE VESSELS	Storage vessels in benzene service – general record	21	1	28/07/2017	28/07/2017
PART III – STORAGE VESSELS	Storage vessel inspection record	22	1	28/07/2017	28/07/2017
PART IV – AIR EMISSIONS FROM INDUSTRIAL SEWAGE	Primary oil-water separators – requirement selection	24	1.1	01/03/2018	01/03/2018
PART IV – AIR EMISSIONS FROM INDUSTRIAL SEWAGE	Primary oil-water separators – monitoring and control requirements	25	(1)	01/07/2018	25/10/2017
PART IV – AIR EMISSIONS FROM INDUSTRIAL SEWAGE	Primary oil-water separators – monitoring and control requirements	25	(2)	01/07/2018	06/06/2018
PART IV – AIR EMISSIONS FROM INDUSTRIAL SEWAGE	Drains and maintenance access points – measurement and control requirements	33		01/07/2019	01/07/2019

Part	Title	Section	Sub Part	Date Required	Date Complete
PART IV – AIR EMISSIONS FROM INDUSTRIAL SEWAGE	Drain and maintenance access point record	34		01/07/2019	01/07/2019
PART V – PRODUCT LOADING	Benzene-containing product loading operations – application	35	1	31/03/2018	31/03/2018
PART V – PRODUCT LOADING	Cargo tank loading operations – general operating requirements	36		28/07/2017	28/07/2017
PART V – PRODUCT LOADING	Vapour-tight cargo tanks	37		01/01/2018	01/01/2018
PART VI – LEAK DETECTION AND REPAIR	Component identification	38	1-5	01/01/2018	01/01/2018
PART VI – LEAK DETECTION AND REPAIR	Component leak survey – general	39	1	01/01/2018	01/01/2018
PART VI – LEAK DETECTION AND REPAIR	Component leak survey – general	39	2-4	01/01/2018	01/01/2018
PART VI – LEAK DETECTION AND REPAIR	Component leak survey – general	39	6	01/03/2018	01/03/2018
PART VI – LEAK DETECTION AND REPAIR	Component leak survey – assessment and measurement of leaks	40	5	01/01/2023	01/01/2023
PART VI – LEAK DETECTION AND REPAIR	Component leak survey plan	41	(1)	01/03/2018	01/03/2018
PART VI – LEAK DETECTION AND REPAIR	Component leak survey plan	41	(3)	01/03/2019	02/25/2019
PART VI – LEAK DETECTION AND REPAIR	Additional leak measurements -pumps, compressors and pressure relief devices	42		01/01/2023	01/01/2023
PART VI – LEAK DETECTION AND REPAIR	Leaks -deviations and repair	43	(1)	01/01/2018	01/01/2018
PART VI – LEAK DETECTION AND REPAIR	Leaks -deviations and repair	43	(2)1.	01/01/2020	01/01/2020
PART VI – LEAK DETECTION AND REPAIR	Leaks -deviations and repair	43	(2)2.	01/01/2023	01/01/2023
PART VI – LEAK DETECTION AND REPAIR	Delay of repair list	44	1-3	01/01/2018	01/01/2018
PART VI – LEAK DETECTION AND REPAIR	Delay of repair list	44	4	01/07/2018	01/07/2018
PART VI – LEAK DETECTION AND REPAIR	Delay of repair list	44	9	01/01/2018	01/01/2018
PART VI – LEAK DETECTION AND REPAIR	Leaking components -annual calculations	47		31/03/2019	31/03/2019
PART VI – LEAK DETECTION AND REPAIR	Records -component leak survey	48	(1) 1-5	01/01/2018	01/01/2018
PART VI – LEAK DETECTION AND REPAIR	Records -component leak survey	48	(1) 6-13	01/01/2018	01/01/2018
PART VI – LEAK DETECTION AND REPAIR	Records -component leak survey	48	(2) 1-5	01/01/2018	01/01/2018
PART VI – LEAK DETECTION AND REPAIR	Records -component leak survey	48	(2) 6	01/01/2018	01/01/2018
PART VI – LEAK DETECTION AND REPAIR	Records -component leak survey	48	(2) 7	01/01/2018	01/01/2018
PART VI – LEAK DETECTION AND REPAIR	Records – additional leak measurements	49	1-7	01/01/2023	01/01/2023
PART VI – LEAK DETECTION AND REPAIR	Records – additional leak measurements	49	8-13	01/01/2023	01/01/2023
PART VII – OPERATION	Technology requirements – open-ended valves	50		01/01/2018	01/01/2018

Part	Title	Section	Sub Part	Date Required	Date Complete
PART VII – OPERATION	Technology requirements – surge control vessels and bottoms receivers	51		01/01/2020	01/01/2020
PART VII – OPERATION	Operating parameter summary table	52		01/01/2018	01/01/2018
PART VIII – REQUIREMENT TO CONTINUE THE USE OF METHODS TO MANAGE EMISSIONS	Identifying managed sources	55		01/01/2018	01/01/2018
PART IX – AMBIENT MONITORING	Ambient monitoring -benzene	60	(1)-(5)	01/01/2018	20/12/2017
PART IX – AMBIENT MONITORING	Ambient monitoring -benzene	60	(6)	01/01/2018	01/01/2018
PART IX – AMBIENT MONITORING	Benzene measurements baseline	61		31/03/2021	31/03/2021
PART IX – AMBIENT MONITORING	Statistical analysis of benzene measurements	62		31/03/2022	17/03/2022
PART IX – AMBIENT MONITORING	Notification – ambient monitoring	63		31/03/2022	17/03/2022
PART X – COMPLAINTS, RECORDS AND REPORTING	Complaints procedure	64	(1) 1-3	01/01/2018	01/01/2018
PART X – COMPLAINTS, RECORDS AND REPORTING	Annual summary reports	65		31/03/2019	31/03/2019
PART X – COMPLAINTS, RECORDS AND REPORTING	Public reporting – ambient monitoring	66		04/03/2018	04/03/2018

## Section 65 (2) Paragraph 8 - Performance Summary Table

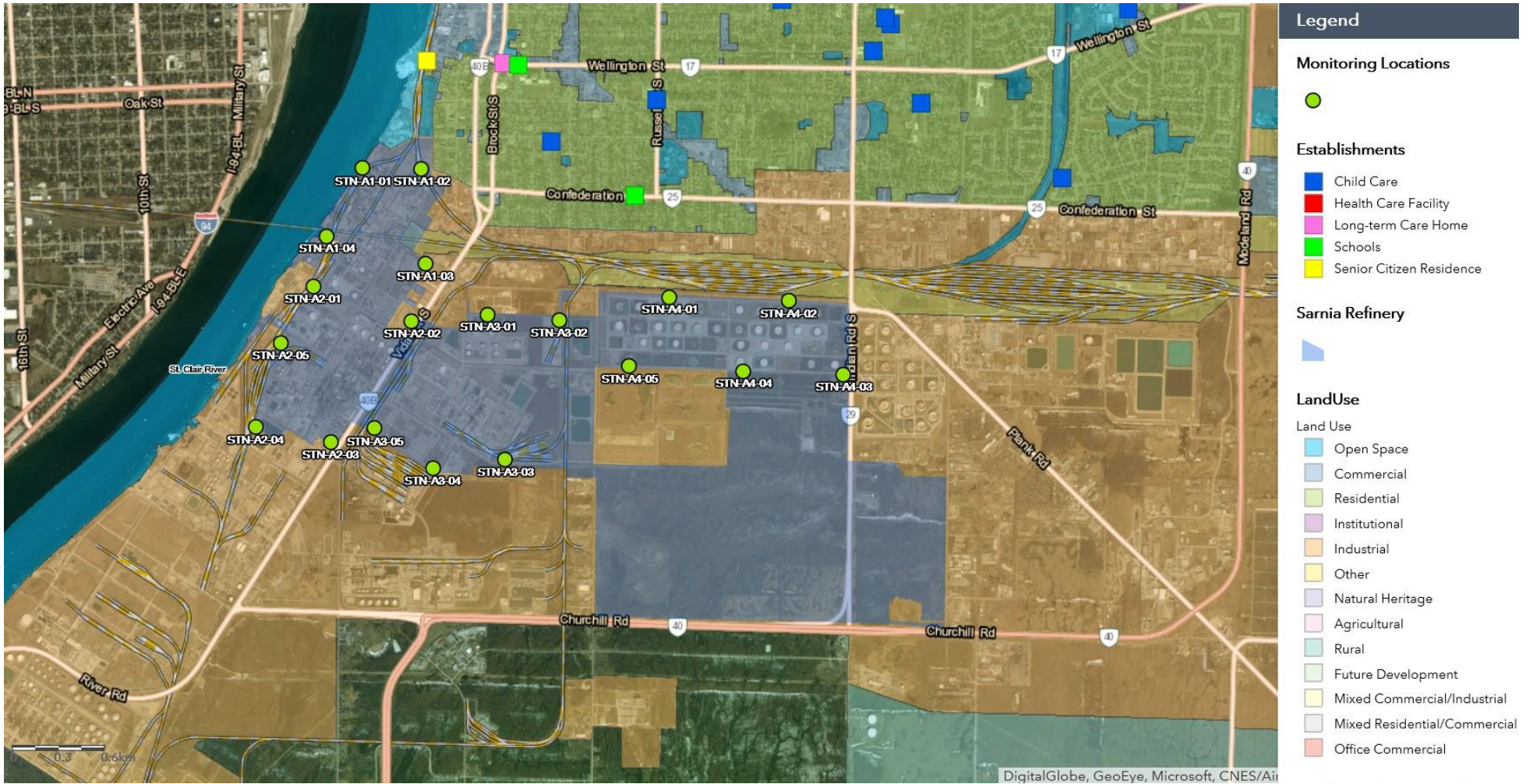
<b>Requirement</b>	<b>Summary</b>
Subsections 8 (1) notifications	No section 4 notifications required No section 7 notifications required
Subsections 11 (1) contraventions	No subsection 11 (1) contraventions occurred
Subsections 26 (1) contraventions	No subsections 26 (1) contraventions occurred
Subsection 52 (5) orders	No subsection 52 (5) orders received
Subsection 58 orders	No subsection 58 orders received

## Section 65 (2) Paragraph 6 - Annual Ambient Monitoring Report for Petroleum Refining – Industry Standard & Petrochemical – Industry Standard

The following information is provided per the requirements of PRIS/PCIS s65(2)6.

- a map showing the location of each monitor required by subsection 60 (1), the information required by clause 60 (4) (d), and other topographical information including any nearby water bodies, roadways and adjacent land uses, **(Figure 6.1)**
- for each monitor required by subsection 60 (1),
  - the information required by subsection 60 (6), **(Table 6.1)**
  - a summary showing the annual average benzene concentration results from the time that the monitor was first required by subsection 60 (1), **(Table 6.2)**
  - the results of calculations required by section 62 to identify whether a statistically significant increase in the concentration of benzene occurred, **(Table 6.3)**
- a summary of the information required by section 63. **(Table 6.4)**

Figure 6.1 - Imperial Sarnia Property Line Monitoring Map



**Table 6.1 – Benzene Concentration Results**

Station ID	STN-A1-01	STN-A1-02	STN-A1-03	STN-A1-04	STN-A2-01	STN-A2-02	STN-A2-03	STN-A2-04	STN-A2-05	STN-A3-01	STN-A3-02	STN-A3-03	STN-A3-04	STN-A3-05	STN-A4-01	STN-A4-02	STN-A4-03	STN-A4-04	STN-A4-05
Location (UTM)	384600	384978	384982	384363	384270	384920	384357	383863	384045	385389	385830	385480	385019	384669	386562	387327	387327	387031	386293
Sample Date / Results (ug/m3)	4757631	4757631	4757631	4757631	4757631	4756638	4757631	4757631	4756520	4757631	4757631	4757631	4757631	4757631	4757631	4757631	4757631	4757631	4757631
1/10/2024	1.1	0.92	1.7	5.5	1.9	4.1	4	1.7	2.4	7.2	3.1	3.5	3.3	2.3	1.7	1.3	3.6	1.2	2.5
1/24/2024	1.9	1.9	3.5	9.6	2.5	5.6	2.7	1.5	2.9	9.1	6.4	7.7	5.8	3.4	3.3	1.9	2.2	1.5	3.3
2/7/2024	1.1	1.4	1.8	2.6	2.6	2.1	5.2	3.4	3.3	6.3	1.7	3	5.5	3.7	1.2	0.99	1.5	1.2	4.3
2/21/2024	2.3	2.4	5.2	5.3	2.7	7.9	4	1	6	13	1.3	2.4	1.9	2.8	1.1	1.7	5.6	1	1.3
3/6/2024	3.3	3.5	6.3	7.7	7.6	7.1	9	8.2	19	19	1.2	2.1	6.8	4.8	1.3	1.6	1.8	1	3.5
3/20/2024	1.6	1.7	2.5	6	3.8	4	12	4.9	11	7	2.2	4.1	7.6	6.3	1.4	1.2	3.5	1.3	4.1
4/3/2024	1.1	1.2	2.2	2.8	2.8	4.8	8.6	4.7	7.6	10	1.8	1.9	3.5	5	1.2	1.1	2.1	0.94	2.1
4/17/2024	1.2	1.2	2.2	5.8	5	3.3	18	3.1	4.9	5.8	0.79	2.9	3.5	5.8	0.69	1	2.8	0.78	2.5
5/1/2024	2.2	2.1	3.2	15	6.1	4.5	6.9	3.8	8.1	11	2.7	2.3	3	4.6	1.4	1.2	2	1	1.8
5/15/2024	1.1	1.3	1.7	3.4	4.7	2.3	15	4.2	8.3	7.1	1.1	2	7	2	0.91	1	1.8	0.74	4.1
5/29/2024	1.3	1.3	2.2	5.4	5.3	5.6	12	2.3	6.2	10	1.8	2.4	5.1	3	1.4	1.6	2.2	1.2	2.6
6/12/2024	2	N/A <sup>a</sup>	N/A <sup>a</sup>	5.1	6.4	5.9	12	2.7	8	11	1.2	1.6	2	1.7	1.6	1.9	3.8	1.2	3.3
6/26/2024	2.4	2.5	2.9	12	8.6	3.9	11	2.4	7.8	16	1.4	1.6	3.1	1.8	1.8	1.9	1.8	1	4.4
7/10/2024	2.1	2	3.6	9.6	5.5	7.4	5.9	2.6	7.1	12	1.8	2.4	2.9	3.3	1.8	2.7	3.2	1.3	2.4
7/24/2024	1.9	2.3	3.4	8.2	4.8	6	8.1	2.2	5.6	16	2.6	2.6	4.6	2.5	2.5	3.2	4.7	1.6	4.7
8/7/2024	1.5	1.9	3	5.5	3.4	9.5	4.2	4.3	5.5	9	1.7	2	3.2	3.5	2.1	3	3.3	1.8	3.7
8/21/2024	1.4	1.3	2.7	4.5	3.8	7.8	7.2	2.5	3.4	10	2.2	2.3	2.3	2.7	2	2.7	4.1	1.6	2.7
9/4/2024	2.5	2.4	5	7.7	4.1	9.7	4.3	2.2	6.7	15	1.9	1.6	2.4	1.7	2.3	2.8	2.3	1.3	1.4
9/18/2024	2.1	1.9	4.4	3.2	4	9.3	2.6	1.1	8.8	14	2.9	1.8	1.2	1.9	2.6	2.8	3	1.3	1.7
10/2/2024	1.5	1.5	3	5	3.7	6.8	5.7	3.6	4.6	8.8	1.7	2.4	2.5	3.1	2	2.6	4	1.6	3
10/16/2024	2.1	1.9	3.4	5.2	3.4	6.4	5.1	2.7	4.3	8.1	1.6	2.9	2.9	2.8	1.6	2	5.7	1.2	2.4
10/30/2024	3.7	3.4	5.7	10	4.1	6.2	2.6	1.3	7.5	17	1.9	1.8	1.8	2	2.2	2.6	3.4	1.2	1.6
11/13/2024	2.1	1.7	3	4.9	4.9	8.6	4.9	1.6	8.7	15	6.9	1.5	1.7	2.2	1.8	1.6	3	1.3	1.7
11/27/2024	1.6	1.2	4	3.8	3.8	7.3	5.2	0.99	6.5	21	5.2	2	1.3	2.2	1.5	1.5	2.7	1.7	3.8
12/11/2024	1.2	1.4	2.6	3.8	1.8	3.7	2.1	0.85	4.4	11	14	2	1.9	2.3	2.2	1.8	2.5	2.7	7
12/25/2024	1.8	1.7	4	3.3	2.8	6.3	2.2	0.98	4.2	18	4.4	2	1.3	1.7	1.6	1.8	2.1	1.3	2.7

<sup>a</sup> Data was unavailable due to laboratory issues.

**Table 6.2 - Annual Average Benzene Concentration Results**

Year / Results (ug/m3)	STN-A1-01	STN-A1-02	STN-A1-03	STN-A1-04	STN-A2-01	STN-A2-02	STN-A2-03	STN-A2-04	STN-A2-05	STN-A3-01	STN-A3-02	STN-A3-03	STN-A3-04	STN-A3-05	STN-A4-01	STN-A4-02	STN-A4-03	STN-A4-04	STN-A4-05
2018	1.9	2.0	3.4	4.8	3.8	5.6	5.7	4.0	6.4	10.1	2.5	3.2	6.0	5.7	2.2	1.5	2.0	1.3	3.2
2019	1.8	1.9	3.3	4.2	4.1	5.2	5.9	3.6	8.3	11.1	2.4	2.9	4.5	4.4	1.7	1.6	2.1	1.2	3.9
2020	1.7	1.8	2.8	3.5	3.7	4.7	5.7	3.2	6.4	10.4	2.3	2.8	4.2	4.3	1.4	1.3	1.2	1.1	2.4
2021	1.7	1.8	2.9	3.8	3.5	4.7	5.3	2.7	5.4	9.8	1.9	2.4	3.4	3.3	2.3	1.8	1.4	2.1	2.2
2022	2.0	2.1	3.2	4.5	3.1	5.5	5.1	2.4	5.1	11.1	2.3	2.7	4.4	4.0	1.7	1.6	1.7	1.2	2.4
2023	1.8	1.9	3.1	5.4	3.4	5.4	5.4	2.9	4.8	11.0	2.5	2.9	4.4	4.3	1.9	2.0	2.8	1.4	2.7
2024	1.8	1.8	3.3	6.2	4.2	6.0	6.9	2.7	6.6	11.8	2.9	2.5	3.4	3.0	1.7	1.9	3.0	1.3	3.0



**Table 6.3 - Statistical Analysis of Benzene Measurements**

Year	Tech Standard Section	Variable	STN-A1-01	STN-A1-02	STN-A1-03	STN-A1-04	STN-A2-01	STN-A2-02	STN-A2-03	STN-A2-04	STN-A2-05	STN-A3-01	STN-A3-02	STN-A3-03	STN-A3-04	STN-A3-05	STN-A4-01	STN-A4-02	STN-A4-03	STN-A4-04	STN-A4-05	
2018 - 2020	61(2)4.	m	79	79	79	79	79	79	79	79	79	79	79	79	79	79	79	79	78	79	79	
		X	0.51	0.58	1.07	1.27	1.25	1.58	1.64	1.17	1.80	2.23	0.74	0.97	1.49	1.50	0.49	0.34	0.41	0.16	1.01	
		S^2	0.14	0.13	0.14	0.27	0.19	0.13	0.18	0.27	0.30	0.21	0.20	0.13	0.19	0.13	0.14	0.08	0.21	0.067	0.28	
2024	62(3)4.	n	26	25	25	26	26	26	26	26	26	26	26	26	26	26	26	26	26	26	26	26
		X	0.56	0.56	1.14	1.72	1.37	1.72	1.77	0.84	1.80	2.41	0.82	0.84	1.08	1.04	0.50	0.58	1.044	0.23	1.024	
		S^2	0.11	0.11	0.13	0.21	0.15	0.17	0.36	0.34	0.20	0.13	0.42	0.12	0.29	0.15	0.12	0.14	0.13	0.073	0.17	
	62(3)5.	Y	0.56	0.56	1.14	1.72	1.37	1.72	1.77	0.84	1.80	2.41	0.82	0.84	1.08	1.036	0.50	0.58	1.044	0.23	1.024	
		X	0.51	0.58	1.071	1.27	1.25	1.58	1.64	1.17	1.79	2.23	0.74	0.97	1.49	1.50	0.49	0.34	0.41	0.16	1.0061	
		S1	0.14	0.13	0.14	0.27	0.19	0.13	0.18	0.27	0.30	0.21	0.20	0.13	0.19	0.13	0.14	0.082	0.21	0.067	0.28	
		S2	0.11	0.11	0.13	0.21	0.15	0.17	0.36	0.34	0.20	0.13	0.42	0.12	0.29	0.15	0.12	0.14	0.13	0.073	0.17	
		m	79	79	79	79	79	79	79	79	79	79	79	79	79	79	79	79	79	78	79	79
		n	26	25	25	26	26	26	26	26	26	26	26	26	26	26	26	26	26	26	26	26
		T	1.70	-0.81	2.22	8.80	3.30	3.95	1.64	-4.43	0.023	5.12	0.89	-4.70	-6.75	-13.88	0.40	8.31	18.49	4.12	0.39	
	62(3)6.	V	51.063	48.17	42.45	56.39	52.35	34.77	29.17	35.76	65.19	69.95	28.84	46.92	32.49	37.95	51.38	31.22	68.83	39.72	69.045	
	62(3)7.	T	3.50	3.51	3.54	3.48	3.50	3.61	3.66	3.60	3.45	3.45	3.67	3.52	3.63	3.58	3.50	3.64	3.45	3.56	3.45	
	62(3)8.	Significant Increase	No	No	No	Yes	No	Yes	No	No	No	Yes	No	No	No	No	No	Yes	Yes	Yes	No	

**Table 6.4 – Summary of Section 63(1) Notifications**

Year	Date of s62 Calculation	Date of MECP Notification	Ambient Monitors
2024	March 4, 2025	March 4, 2025	STN-A1-04, STN-A2-02, STN-A3-01, STN-A4-02, STN-A4-03, STN-A4-04