

Suncor Energy Products Partnership 1900 River Road, P.O Box 307 Sarnia, Ontario N7T 7J3 Tel (519) 337-2301 Fax (519) 332-3309 www.suncor.com

IMPLEMENTATION SUMMARY TABLE

The Implementation Summary Table is required by paragraph 1 of Subsection 65 (2) of the Petroleum Refining Industry Standard. The table is for the 2021 calendar year and outlines the provisions of the industry standard that apply to the Sarnia Refinery and the associated application and compliance dates.

2021 Implementation Summary Table

| Provision | Compliance Date | Compliance Achieved | Implementation Date |
|---|-----------------|------------------------|--|
| Section 9 - prepare record of Storage Vessels (Tank List) | January 1, 2018 | Yes | January 1, 2018 |
| Section 10 - Storage vessels – application >50% benzene | January 1, 2020 | Yes | January 1, 2018 |
| Section 52 - prepare Operating Parameter Summary Table | January 1, 2018 | Yes | January 1, 2018 |
| Section 55 - prepare Identification of Managed Sources Table | January 1, 2018 | Yes | January 1, 2018 |
| Section 60 - Ambient Fenceline Monitoring to commence | January 1, 2018 | Yes | January 1, 2018 |
| Section 66 - Ensure ambient monitoring public information is posted on a website | March 1, 2018 | Yes | Within 60 days of taking a 2-week sample |
| Section 24 - select Primary Oilwater Separator compliance method | March 1, 2018 | Yes | March 1, 2018 |
| Section 25 - Primary oil-water separators – monitoring and control requirements | January 1, 2019 | Yes | March 1, 2018 |
| Section 33 - Drains and maintenance access points – measurement and control requirements | July 1, 2019 | Yes | July 1, 2019 |
| Section 35 - record amount of benzene-containing product for each loading rack or berth | March 1, 2018 | Yes | March 1, 2018 |

| Section 38 - LDAR Component Inventory | January 1, 2018 | Yes | January 1, 2018 |
|--|--------------------|-----|-------------------|
| Section 41 - LDAR Leak Survey Plan | March 1, 2018 | Yes | January 29, 2018 |
| Section 39 - Provide the Director with a written summary of dates on which the LDAR component leak survey will occur | March 1, 2018 | Yes | March 1, 2018 |
| Section 17 - Complete OGI inspection on tanks in benzene service | April 30, 2018 | Yes | April 20, 2018 |
| Section 28 - Complete OGI inspection on API Separator | April 30, 2018 | Yes | April 20, 2018 |
| Section 39-40, 42-49 - LDAR Surveys | June 30, 2018 | Yes | June 11, 2018 |
| Section 39-40, 42-49 - LDAR Surveys | September 30, 2018 | Yes | July 27, 2018 |
| Section 39-40, 42-49 - LDAR Surveys | December 31, 2018 | Yes | December 11, 2018 |
| Section 43(2) - Leaks - deviations and repair | January 1, 2020 | Yes | January 1, 2020 |
| Section 44 - Delay of Repair List | July 1, 2018 | Yes | June 28, 2018 |
| Section 51 - Technology requirements – surge control vessels and bottoms receivers | January 1, 2020 | Yes | January 1, 2020 |