**REPORT**

# September 2026 B(a)P Sampling Results Above Measured Level Report

*Rain Carbon Canada Inc.*

Submitted by:

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# 1.0 INTRODUCTION

The ambient air monitoring measurements for September 2026 follow **December 12, 2019, Monitoring Plan** for B(a)P and Benzene (the Plan) approved by the Ontario Ministry of the Environment, Conservation and Parks (MECP) on **December 20, 2019.**

As required by the Plan, Rain completed five monitoring events in the month of **September 2026 (September 5, 11, 17, 23 and 29)** and submitted a monthly summary report to the MECP entitled "September 2026 Ambient Air Monitoring Report" (the AAMR).

As presented in the September 2026 AAMR, there was one B(a)P concentration recorded above the 0.0043 µg/$m^3$ Measured Level threshold which triggered the preparation of this report, as set out in the **ECA #7313-8KEN49 Notice No.1 issued November 17, 2022.**

This report includes information on the causes and prevention of future concentrations above the Measured Level threshold. Where possible, this report will include the following items as per the **ECA #7313-8KEN49 Notice No.1 issued November 17, 2022.**

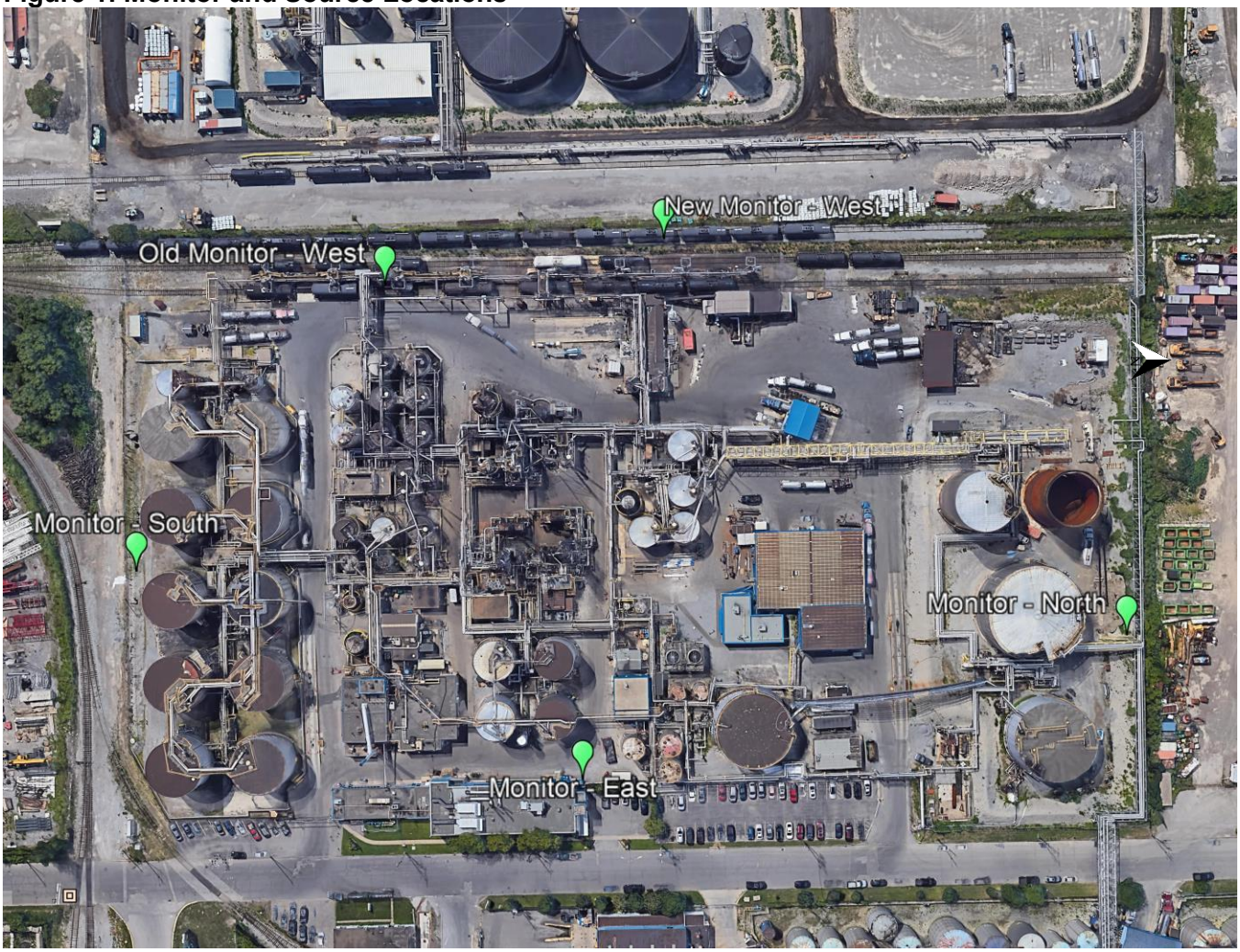
An analysis of what may have caused the B(a)P concentration to be above the Measured Level Threshold.

- Production rate(s) at the time measuring B(a)P concentration to be above the Measured Level Threshold.
- An assessment of additional equipment, technically feasible methods and operational measures that are available to further minimize the likelihood of measurements above the Measured Level Threshold; and
- A proposed schedule to implement any actions that would minimize the likelihood of measurements above the Measured Level Threshold.

## 2.0 B(A)P MONITORING

The monitoring program for B(a)P consists of setting up a polyurethane foam (PUF) polyaromatic hydrocarbon (PAH) sampling system at five locations at the Facility, as presented in Figure 1 and also at the HAMN Station 29164. Samples were collected over a 24-hour period. Air quality data acquisition and instrument performance were evaluated by Rain Carbon Canada Inc. personnel. The laboratory analysis was conducted by Bureau Veritas Laboratories, which is ISO17025 compliant and accredited.

**Figure 1: Monitor and Source Locations**



The MECP included a Measured Level threshold as a trigger to evaluate progress on B(a)P emission reduction. This level set by the MECP is not directly related to the ESDM Report results.

The B(a)P concentration measured below on **Wednesday September 23, 2026**, **was above the 0.00430 µg/m³ Measured Level threshold** which triggered the preparation of this report, as set out in the ECA #7313-8KEN49 Notice No.1 issued November 17, 2022, and this measurement was also **above the 0.00500 µg/m³ B(a)P Upper Risk Threshold (URT)**.

The concentration of **0.0110 µg/m³ B(a)P** measured at the **new west monitor** on the **Wednesday September 23, 2026, MECP monitoring event** was above the 0.00430 µg/m³ B(a)P Measured Level Threshold (MLT) which triggered the preparation of the September 2026 AML report. This measurement was also above the 24-hr Upper Risk Threshold (URT) of 0.0050 µg/m³ B(a)P which required a Section 30 Notification to the MECP.

**Table 1: Summary of September 2026 B(a)P Measurements.**

| Monitoring Event Date | | Measured Concentration [µg/m³] | | | | |
|---|---|---|---|---|---|---|
| | East | North | Old West | South | New West | HAMN STN 29164 |
| September 5 | 0.00037 | <0.00030 | 0.00217 | <0.00032 | <0.00032 | <0.00030 |
| September 11 | 0.00090 | 0.00042 | 0.00043 | <0.00032 | 0.00069 | <0.00033 |
| September 17 | 0.00069 | <0.00033 | 0.00119 | 0.00054 | 0.00083 | <0.00031 |
| September 23 | 0.00042 | 0.00067 | 0.00227 | 0.00035 | **0.01100*** | <0.00030 |
| September 29 | 0.00050 | 0.00063 | 0.00106 | <0.00034 | 0.00088 | <0.00031 |

***B(a)P measurement both above the 0.00430 µg/m³ B(a)P Measured Level Threshold (MLT) and the 0.0050 µg/m³ B(a)P Upper Risk Threshold (URT)**

## 2.1 Facility Conditions During Monitoring

Table 2 summarizes daily vehicle loading activities at the Facility during September 23, 2026, monitoring event for sources previously identified as the primary contributors to B(a)P emissions.

**Table 2: Summary of Facility Activities on September 23, 2026.**

| Monitoring Event | Area | Modelling Source ID | Daily Vehicle Loading [US gal] | | | | |
|---|---|---|---|---|---|---|---|
| | | | Pitch | Creosote | Naphthalene Oil | LPSB | RT-12 |
| **September 23, 2026** | Railcar Loading | LS3 | 31,020 | 49,197 | 0 | 0 | 0 |
| | Truck Loading | LS2 | 0 | 0 | 0 | 0 | 0 |
| | Truck Loading | LS4 | 93,429 | 32,786 | 0 | 0 | 8,274 |

The daily vehicle loading data is based on information derived from the Systems, Application and Products (SAP) Enterprise Resource Planning software system which tracks the amount of material loaded into trailers and rail cars in kilograms. This data was converted to US gallons, representing the amount of material loaded during the monitoring event (i.e., daily amount loaded). This daily loading data allows for a better representation of Facility conditions during the 24-hour monitoring events.

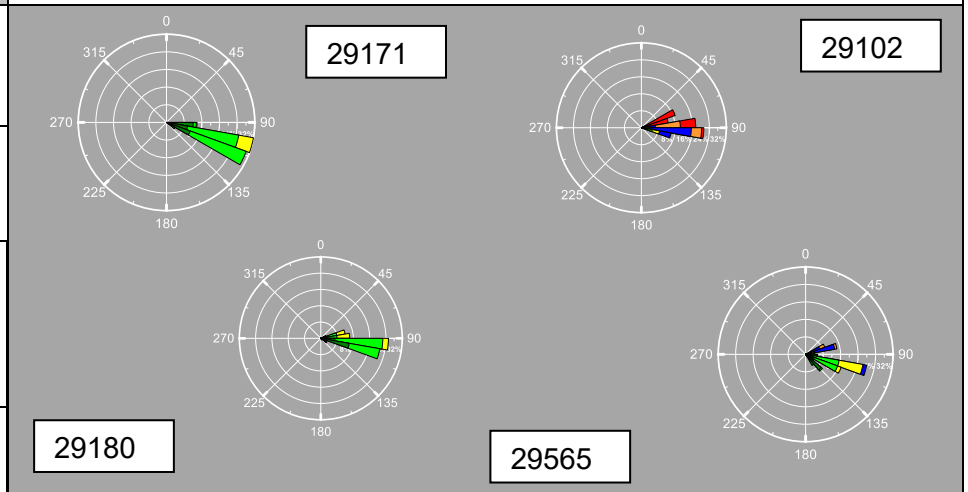
The monitoring and control of loading volumes is part of Standard Operation Procedures (SOPS) for material loading.

# 3.0 MONITORING RESULTS AND ANALYSIS

At this time, a general correlation between Facility operations and measured concentrations cannot be identified. Although the monitors are located within the Facility's property, their measurements are likely impacted by emissions from other industrial facilities and transportation sources in the vicinity.

Table 3 summarizes September 23, 2026, monitoring day results and wind conditions and facility loading operations. The analysis of the results is presented below Table 3.

**Table 3: Summary of Wind Conditions, Facility Operations and Measured B(a)P Concentrations during Wednesday September 23, 2026.**

| | HAMN Station | Wind Direction & Strength | Overall |
|---|---|---|---|
| | 29171 | E, ESE (Moderate, Strong) |   |
| | 29102 | E, ENE (Moderate, Strong) | |
| | 29180 | E, ESE (Calm, Moderate, Strong) | |
| | 29565 | E, ESE (Calm, Moderate, Strong) | |

| | Facility Area | Modelling Source ID | Daily Total Amount Loaded [US gal] | | | | |
|---|---|---|---|---|---|---|---|
| | | | Pitch | Creosote | Naphthalene Oil | LPSB | RT-12 |
| **Facility Operations** | Railcar Loading | LS3 (close to Old West and New West Monitors) | 31,020 | 49,197 | 0 | 0 | 0 |
| | Truck Loading | LS2 (close to Old West Monitor) | 0 | 0 | 0 | 0 | 0 |
| | Truck Loading | LS4 (close to New West Monitor) | 93,429 | 32,786 | 0 | 0 | 8,274 |

| **Measured Concentrations [µg/m³]** | East Monitor | North Monitor | Old West Monitor / New West Monitor | South Monitor/STN29164 |
|---|---|---|---|---|
| | 0.00042 | 0.00067 | 0.00227 / **0.01100*** | 0.00035 / < 0.00030 |

**Wednesday September 23, 2026, monitoring event**:

The **Wednesday, September 23, 2026,** Hamilton site wind direction was from a general **easterly** direction over the course of the day. This information is summarized in the table below.

| Monitoring Event | September 23, 2026 |
|---|---|
| **Wind Strength** | **Calm \| Moderate \| Strong** |
| **Main Wind Direction** | **E, ENE, ESE** |

The table below summarizes loading activities during the September 23, 2026, monitoring event.

| Monitoring Event | September 23, 2026 |
|---|---|
| Total Volume Loaded from Rail Car Loading LS3 [US gal] | 80,217 |
| Total Volume Loaded from Truck Loading LS2 Spot 1 [US gal] | 0 |
| Total Volume Loaded from Truck Loading LS4 Spot 7 [US gal] | 134,488 |

During the September 23, 2026 monitoring event, railcar loading consisted of 31,020 US gal of coal tar pitch and 49,197 US gal of creosote.

The truck loading LS4 (Truck Loading Spot 7) activity was for 93,429 US gal of coal tar pitch, 32,786 US gal of LPSB and 8,274 US gal of RT-12. There was no truck loading at LS2 (Spot 1).

**New West Monitor Measurement on Wednesday September 23, 2026**

The **0.0110 µg/m³ B(a)P measurement at the new west monitor on the Wednesday September 23, 2026, monitoring event** was above the 0.00430 µg/m³ Measured Level threshold and above the 24-hour upper risk threshold (URT) of 0.005 µg/m³ B(a)P.

- A **"green" coal tar pitch truck/trailer loading audit** at LS4 (Truck Loading Spot 7) was conducted on the Wednesday September 23, 2026, monitoring event.
- The coal tar pitch tank PVRV checks conducted on the **Wednesday September 23, 2026, monitoring event** did not reveal any visible fugitive B(a)P emissions.
- During Wednesday September 23, 2026 monitoring event, railcar loading consisted of 17,363 US gal of coal tar pitch and 31,020 US gal of creosote.
- The truck loading LS4 (Truck Loading Spot 7) activity on Wednesday September 23, 2026, MECP monitoring event was for 117,926 US gal of coal tar pitch and 8,274 US gal of RT-12.
- However, on Wednesday September 23, 2026, a full roll off bin of creosote crystal solid sludge was moved from the **west site railcar cleaning location** by a contractor to the **north security gate for removal from site as hazardous waste**. The roll off bin was lifted up to an angle of about 45 degrees to the horizontal while being moved onto the trailer and a quantity of creosote crystal solid dust fell out of the back of the roll off bin creating some airborne creosote crystal dust particles which were then carried by the easterly wind over to the new west monitor. This may have been the likely source of the **0.0110 µg/m³ B(a)P measurement** at the new west monitor on the Wednesday September 23, 2026, MECP monitoring event.

## 4. CONCLUSION

This report was prepared to fulfill the requirements of the **ECA #7313-8KEN49 Notice No.1 issued November 17, 2022.**

**Table 4: Conclusions**

| | **Conclusions** |
|---|---|
| Analysis of what could have caused the B(a)P concentration to be above the Measured Level Threshold. | **<u>New West Monitor Measurement on Wednesday September 23, 2026</u>**<br><br>The **0.0110 µg/m³ B(a)P measurement at the new west monitor on the Wednesday September 23, 2026, monitoring event** was above the 0.00430 µg/m³ Measured Level threshold and above the 24-hour upper risk threshold (URT) of 0.005 µg/m³ B(a)P.<br><br>• A **"green" coal tar pitch truck/trailer loading audit** at LS4 (Truck Loading Spot 7) was conducted on the Wednesday September 23, 2026, monitoring event.<br><br>• The coal tar pitch tank PVRV checks conducted on the **Wednesday September 23, 2026, monitoring event** did not reveal any visible fugitive B(a)P emissions.<br><br>• During Wednesday September 23, 2026 monitoring event, railcar loading consisted of 17,363 US gal of coal tar pitch and 31,020 US gal of creosote.<br><br>• The truck loading LS4 (Truck Loading Spot 7) activity on Wednesday September 23, 2026, MECP monitoring event was for 117,926 US gal of coal tar pitch and 8,274 US gal of RT-12.<br><br>• However, on Wednesday September 23, 2026, a full roll off bin of creosote crystal solid sludge was moved from the **west site railcar cleaning location** by a contractor to the **north security gate for removal from site as hazardous waste**. The roll off bin was lifted up to an angle of about 45 degrees to the horizontal while being moved onto the trailer and a quantity of creosote crystal solid dust fell out of the back of the roll off bin creating some airborne creosote crystal dust particles which were then carried by the easterly wind over to the new west monitor. This may have been the likely source of the **0.0110 µg/m³ B(a)P measurement** at the new west monitor on the Wednesday September 23, 2026, MECP monitoring event. |
| Loading volumes(s) in US gal at the time measuring B(a)P concentrations to be above the Measured Level threshold. | Details on loading volumes (US gal) are presented in Section 2.0 of this report. |

| | |
|---|---|
| Assessment of additional equipment, technically feasible methods and operational measures that are available to further minimize the likelihood of measurements above the Measured Level threshold and the proposed schedule to implement any actions that would minimize the likelihood of measurements above the Measured Level threshold. | Rain will continue conducting vehicle loading audits on each monitoring day to continue assessing the operations of loading equipment and operators' implementation of Standard Operating Procedures.<br><br>Rain Carbon's Abatement Plan includes installation of fully enclosed automated railcar loading in Q1 2027. |

Signature Page



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