

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 2019 calendar year and outlines the provisions of the industry standard that apply to the Sarnia Refinery and the associated application and compliance dates.

2019 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 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 Oil-water Separator compliance method	March 1, 2018	Yes	March 1, 2018
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 44 - Delay of Repair List	July 1, 2018	Yes	June 28, 2018