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## 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 2024 calendar year and outlines the provisions of the industry standard that apply to the Sarnia Refinery and the associated application and compliance dates.

### 2024 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 Oil-water 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
Section 62 – Statistical analysis of benzene measurements	March 31, 2022	Yes	March 20, 2022