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January 4, 2022

KEN BOUCHARD
SHELL CANADA LIMITED
400 4TH AVE SW
CALGARY AB T2P 0J4
ken.bouchard@shell.com

FS - LF Variance
Service Request No.: as noted below
FS Gasoline Station
Installed at: as noted below

Dear KEN BOUCHARD,

Re: Variance from clause 4.5.1.3 of the Liquid Fuels Handling Code, O. Reg. 217/01

This is in response to your variance application for the locations noted below:

1805 Victoria Park Ave, Scarborough	SR 3041414
463 Wellington Rd, London	SR 3041418
396 North Front St, Bellville	SR 3041420
1140 Highbury Ave N, London	SR 3041428
204 Grove Street, Barrie	SR 3041434
720 March Rd, Kanata	SR 3041440
2695 Credit Valley Rd, Mississauga	SR 3148996
5 Great Lakes Dr, Brampton	SR 3149004

Your variance request was to allow an extension to December 31, 2022, to upgrade the electronic line leak detection (ELLD) at eight sites, which were due for upgrades on October 1, 2021. Instead of upgrading the existing piping with ELLD, Shell will be replacing the underground product piping with new piping at these sites in 2022.

Please be advised that your variance application has been approved because there are several activities that Shell engages in to ensure their petroleum systems are in working order and do not pose any risks to the environment. These include:

- Shell currently monitors their piping systems with liquid sensors in the dispenser sumps.
- Third party petroleum and facility maintenance contractors perform annual and bi-annual inspections on all fuel systems.
- The retailers perform weekly inspections and are mandated to call in any irregularities they may observe.
- Shell's SIR (Statistical Inventory Reconciliation) group monitors any variances, and if they determine that any discrepancies are concerning or have a pattern, they request to have Tank and Line testing performed by Cantest, a company that specializes in third party leak detection testing, evaluation and calibration services for storage tanks and fuel dispensing equipment.

Please be advised that this variance will not take effect until 15 days from the date of posting the decision on the Environmental Registry. This decision of the Director is subject to a right of appeal, under the Environmental Bill of Rights, if such an appeal is filed within 15 days from date of posting. In the event an appeal is filed, this decision of the director may be subsequently stayed, disallowed or significantly altered. Notice of an appeal will be placed on the Environmental Bill of Rights Registry.

This variance is allowed under the authority of subsection 36.(3)(c) of the *Technical Standards and Safety Act, 2000*, (the “Act”) and subject to such conditions as may be specified herein, being that:

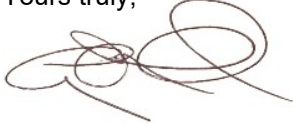
- The installation/system/appliance dealt with in this variance must be inspected and may be periodically audited by TSSA. Please contact the following inspector to arrange for the initial inspection:

1805 Victoria Park Ave, Scarborough	SR 3041414: Mary Ferrari, mferrari@tssa.org
463 Wellington Rd, London	SR 3041418: Chad Coxon, ccoxon@tssa.org
396 North Front St, Bellville	SR 3041420: Dave Norman, dnorman@tssa.org
1140 Highbury Ave N, London	SR 3041428: Chad Coxon, ccoxon@tssa.org
204 Grove Street, Barrie	SR 3041434: Norm Levesque, nlevesque@tssa.org
720 March Rd, Kanata	SR 3041440: Dave Norman, dnorman@tssa.org
2695 Credit Valley Rd, Mississauga	SR 3148996: Debbie Danek, ddanek@tssa.org
5 Great Lakes Dr, Brampton	SR 3149004: Mary Ferrari, mferrari@tssa.org
- Non-conformity with the conditions specified shall thereby cause the allowed variance to become null and void;
- The applicant accepts full responsibility for any and all damages resulting from the use of the thing to which the variance applies. The applicant further accepts full responsibility for any impacts to the health and safety of any person in consequence of the allowance of the variance or of non-conformity with the conditions specified. The Technical Standards and Safety Authority accepts no responsibility for any such damages or impacts;
- In the event of any claims against the Technical Standards and Safety Authority arising from allowance of the variance or non-conformity with the conditions specified, the applicant agrees to indemnify the Technical Standards and Safety Authority and agrees to hold it harmless from such claims and attendant costs;
- The variance process is subject to public access under the TSSA Access and Privacy Code (available upon request). The fact that a variance has been granted and information about any public conditions, such as a requirement to post a sign, may be released on request. Subject to law and the TSSA Access and Privacy Code, proprietary information will not be subject to release;
- The applicant shall pay the fee associated with the review of the variance; and
- A copy of the variance letter shall always be kept readily available and permanently legible in the vicinity of the appliance/equipment.

This variance only relates to the Act and regulations made thereunder and does not exempt you from compliance with other applicable regulatory requirements. The installation may be subject to an inspection to ensure compliance with the terms of the variance.

Should you have any questions or require further assistance, please contact Marek Kulik at 416-734-3465 or by email at mkulik@tssa.org. When contacting TSSA regarding this file, please refer to the Service Request number provided above.

Yours truly,



Gary Highfield
Manager, Fuels Safety Engineering
Delegated Authority under section 36(3) (c) of TSS Act

- c. Cindy Rees, BGIS, cindy.rees@bgis.com
- Mary Ferrari, mferrari@tssa.org
- Chad Coxon, ccoxon@tssa.org
- Dave Norman, dnorman@tssa.org
- Norm Levesque, nlevesque@tssa.org
- Debbie Danek, ddanek@tssa.org

<p>A legible copy of this letter shall be kept readily available near the appliance/equipment. This variance is not valid unless all variance conditions in this letter have been met.</p>
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