

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 2265-CZZQD3
Issue Date: February 22, 2024

Suncor Energy Inc.
3275 Rebecca Street
Oakville, Ontario
L6L 6N5

Site Location: Various Sites across Ontario to stay
and add 22726 Clarington Integrated Travel Stop
at 2475 Energy Drive
Municipality of Clarington, Regional Municipality of Durham

You have applied under section 20.2 of Part II.1 of the Environmental Protection Act, R.S.O. 1990, c. E. 19 (Environmental Protection Act) for approval of:

an amendment to the existing Approval # 9063-CQFJ4Q, to include the Clarington Petro Pass Facility site (#78 in Schedule A), located at 2475 Energy Drive, in the Municipality of Clarington, Ontario, which consists of following Proposed Works:

Proposed Works:

- **oil and water separator (catchment area 0.03 hectares):** one (1) oil and water separator model ZCL COWS-380 coalescing separator, or Equivalent Equipment, as a spill containment, having an oil storage capacity of 740 litres, a total holding capacity of 5,000 litres and a maximum treatment flow rate of 380 litres per minute, receiving stormwater runoff from the petro pass site fuelling area, discharging on site via a lift pump;

All in accordance with the application for an amendment of the Environmental Compliance Approval, dated February 2, 2023 and received on February 10, 2023, submitted by MGM Consulting Inc., on behalf of Suncor Energy Inc., along with all other supporting information submitted by MGM Consulting Inc.

Existing Works: (approved under ECA - 9063-CQFJ4Q)

an amendment to the existing Approval # 0360-BWKM27 to remove outlet number 22021, 3811

Keele Street, Toronto, Ontario (#69 in Schedule A) as the site has been divested, all facilities removed and backfilled and no longer owned by the Owner Suncor Energy;

the rest of the Petro-Pass Stations Sewage Works remain operative as listed in the Schedule A and as per the description of the existing works as follows and all in accordance with the submitted application and supporting documents listed in **Schedule C** forming part of this Approval:

Works for the collection, transmission, treatment and disposal of stormwater run-off from petroleum storage and distribution facilities, including only **cardlocks, keylocks, bulk plants and Petro Pass facilities** at various locations in the Province of Ontario, which do not directly discharge into any lake or river, as listed on Schedule A;

including all other controls and appurtenances essential for the proper operation of the sewage Works;

all as per the Application for Environmental Compliance Approval, dated January 6, 2023 and received on January 6, 2023, submitted by Yousry Hamdy, P.Eng., Manager, Water and Wastewater of ARCADIS Canada Inc. and signed off by Florian Bernado, Technical Advisor_Aset Management, Suncor Energy Inc.

For the purpose of this environmental compliance approval, the following definitions apply:

1. "Approval" means this entire document and any schedules attached to it, and the application;
2. "Director" means a person appointed by the Minister pursuant to section 5 of the EPA for the purposes of Part II.1 of the EPA;
3. "District Manager" means the District Manager of the appropriate local District Office of the Ministry, where the Works are geographically located;
4. "EPA" means the *Environmental Protection Act*, R.S.O. 1990, c.E.19, as amended;
5. "Equivalent Equipment" means a substituted equipment or like-for-like equipment that meets the required quality and performance standards of the approved named equipment;
6. "Ministry" means the ministry of the government of Ontario responsible for the EPA and OWRA and includes all officials, employees or other persons acting on its behalf;
7. "Owner" means Suncor Energy Inc., and includes its successors and assignees;
8. "OWRA" means the *Ontario Water Resources Act*, R.S.O. 1990, c. O.40, as amended; and
9. "Works" means the sewage works described in the Approval, and includes all Existing

Works.

You are hereby notified that this environmental compliance approval is issued to you subject to the terms and conditions outlined below:

TERMS AND CONDITIONS

1. GENERAL CONDITIONS

1. The Owner shall ensure that any person authorized to carry out work on or operate any aspect of the Works is notified of this Approval and the conditions herein and shall take all reasonable measures to ensure any such person complies with the same.
2. Except as otherwise provided by these conditions, the Owner shall design, build, install, operate and maintain the Works in accordance with the description given in this Approval, the application for approval of the Works and the submitted supporting documents and plans and specifications as listed in this Approval.
3. Where there is a conflict between a provision of any submitted document referred to in this Approval and the conditions of this Approval, the conditions in this Approval shall take precedence, and where there is a conflict between the listed submitted documents, the document bearing the most recent date shall prevail.
4. Where there is a conflict between the listed submitted documents, and the application, the application shall take precedence unless it is clear that the purpose of the document was to amend the application.
5. The requirements of this Approval are severable. If any requirement of this Approval, or the application of any requirement of this Approval to any circumstance, is held invalid or unenforceable, the application of such requirement to other circumstances and the remainder of this Approval shall not be affected thereby.
6. For existing Works included in this Approval, the Owner shall confirm in writing to the Ministry that the Works were installed in accordance with the description given in the approval, as listed in Schedule A, and revoked and replaced by this Approval. The confirmation shall be included as part of the reporting requirements of condition No. 6.
7. For new Works to be included in this Approval through future revisions, the Owner shall confirm that the Works were installed in accordance with the application for approval for the Works and supporting documentation as described in Schedule A. The confirmation shall be included as part of the reporting requirements of condition No. 6.
8. The issuance of, and compliance with the conditions of this Approval does not:
 - a. relieve any person of any obligation to comply with any provision of any applicable

statute, regulation or other legal requirement, including, but not limited to, the obligation to obtain approval from the local conservation authority necessary to construct or operate the sewage Works; or

- b. limit in any way the authority of the Ministry to require certain steps be taken to require the Owner to furnish any further information related to compliance with this Approval.

2. OPERATION AND MAINTENANCE

1. The Owner shall ensure that the Works and related equipment and appurtenances which are installed or used to achieve compliance with this Approval are properly operated and maintained.
2. In furtherance of Subsection (1), prior to commissioning of new Works, or for existing Works, within six months of the issuance of this Approval, the Owner shall develop and implement site specific procedures for operation, inspection and maintenance of the Works and related appurtenances which are consistent with the Best Management Practices for Oil Water Separator Systems at Suncor Energy Products Partnership Petroleum Storage and Distribution Facilities (Cardlocks, Keylocks, Bulk Plants and Petro Pass) Handling Petroleum Products in Ontario and appended at Schedule B of this Approval. The Owner shall operate, inspect and maintain the Works in accordance with this Approval.
3. The Owner shall make the procedures developed in accordance with Subsection (2) available for inspection and copying by Ministry personnel, upon request. The Owner shall update the procedures as required.
4. The Owner shall prepare and implement a plan for the orderly shut down, maintenance and re-opening of all separators that require shut down over a portion of the winter months as weather conditions dictate ("winterization plan"), and develop and implement contingency plans, while the separators are not operating. As part of the reporting requirements of condition No. 6, the Owner shall list all separators that were shut down over the reporting period, including details of the dates of the winter shut down and the procedures followed under the winterization plan.

3. OPERATOR TRAINING

1. The Owner shall;
 - a. implement a province wide training program for all operators having control of the approved Works at each site;
 - b. develop a system for monitoring, tracking and auditing operator training;
 - c. ensure that the training is kept up to date through such revisions to the training program as may be required from time to time; and

- d. develop a system for auditing the effectiveness of operator training systems.
2. The Owner shall ensure that all operators having control of the operation of the approved Works at each site are provided training regarding:
 - a. the operation of the Works during normal operating conditions and during emergency situations; and
 - b. the requirements of this Approval, especially Schedule B.

4. REPORTING EMERGENCIES

1. In addition to the obligations under Part X of the EPA, Section 15 of the EPA, and O. Reg. 675/98 (Classification and Exemption Of Spills and Reporting of Discharges), the Owner shall, within fifteen (15) days of the occurrence of any reportable spill as provided in Part X of the EPA and Ontario Regulation 675/98, or any discharge of a contaminant that requires notification to be provided to the Ministry pursuant to section 15 of the EPA and Ontario Regulation 675/98, submit a full written report of the occurrence to the District Manager describing the cause and discovery of the spill or discharge, clean-up and recovery measures taken, preventative measures to be taken and schedule of implementation.

5. RECORD KEEPING

1. The Owner shall maintain a log-book at each site at all times, which shall be made available for inspection and copying by Ministry personnel upon request. The log-book shall contain the following:
 - a. Results of inspections as per the requirements of Schedule B;
 - b. Spills or other emergencies, routine maintenance; and
 - c. Quantity, frequency and date of slop oil and sediment disposal from the oil/water separator.
2. The Owner shall develop a centralized monitoring and record keeping system regarding the operations at each site, to ensure compliance with the requirements of this Approval.
3. The Owner shall retain for a minimum of five (5) years from the date of their creation, or longer if requested in writing by the Director, all records and information required by this Approval.

6. REPORTING

1. One week prior to the start up of the operation of new Works at a site, the Owner shall notify the District Manager in writing, of the pending start up date.

2. The Owner shall prepare and submit a performance report to the District Manager on an annual basis within ninety (90) days following the end of the period being reported upon. The first such report shall cover the first calendar year following the issuance of this Approval and subsequent reports shall be submitted to cover successive annual periods following thereafter. The reports shall contain, but shall not be limited to, the following information:
 - a. a description of any significant operating problems encountered and corrective actions taken;
 - b. a summary of all maintenance carried out in accordance with Schedule B on any major structure, equipment, apparatus, mechanism or thing forming part of the Works;
 - c. a summary of measures taken to comply with condition No. 3, including a summary of the training programs and updates, and confirmation that only trained operators were employed for the operation of the Works; and,
 - d. a statement as to compliance with all of the terms and conditions of this Approval and in the event of any non-compliance during the reporting period, details of the non-compliance as well as details of how and when any non-compliance was corrected.
3. The annual reports shall be signed by an executive officer of the Owner.
4. The Owner shall, upon request, make all manuals, plans, records, data, procedures and supporting documentation available to Ministry staff.

7. SPILL CONTINGENCY PLAN

1. The Owner shall implement a spill contingency plan - that is a set of procedures describing how to mitigate the impacts of a spill within the area serviced by the Works at each site. The said plan shall include as a minimum:
 - a. the name, job title and location (address) of the Owner, person in charge, management or person(s) in control of the facility;
 - b. the name, job title and 24-hour telephone number of the person(s) responsible for activating the spill contingency plan;
 - c. a site plan drawn to scale showing the facility, including major equipment and areas of potential concern for spills such as product loading/unloading areas, nearby buildings, streets, catch basins & manholes, drainage patterns (including direction(s) of flow in storm sewers), any receiving body(ies) of water that could potentially be significantly impacted by a spill and any features which need to be taken into account in terms of potential impacts on access and response (including physical obstructions and location of response and clean-up equipment);

- d. steps to be taken to report, contain, clean up and dispose of contaminants following a spill, as per the requirements of Schedule B, including implementation of winterization plans pursuant to Condition 2.4;
 - e. a listing of telephone numbers for: local clean-up company(ies) who may be called upon to assist in responding to spills; local emergency responders including health institution(s); and Ministry Spills Action Centre 1-800-268-6060;
 - f. Materials Safety Data Sheets (MSDS) for each hazardous material which may be transported or stored within the area serviced by the works;
 - g. the means (internal corporate procedures) by which the spill contingency plan is activated;
 - h. a description of the spill response training provided to employees assigned to work in the area serviced by the Works, the date(s) on which the training was provided and by whom;
 - i. an inventory of response and clean-up equipment available to implement the spill contingency plan, location and, date of maintenance/replacement if warranted; and
 - j. the date on which the contingency plan was prepared and subsequently, amended.
2. The spill contingency plan will be kept in a conspicuous place inside the building. The Owner or Operator shall post signs which provide details of safe operating procedures and emergency phone numbers.
 3. The spill contingency plan will be amended from time to time as needed by changes in the operation of the facility.
 4. The Owner's emergency contact phone number shall be clearly posted at each of the loading racks at the bulk plants or islands comprised in the cardlock, keylock, or Petropass fuel dispensing station with a concise list of instructions for truck drivers (clients) to follow in case of emergencies occurring outside of regular business hours.

The reasons for the imposition of these terms and conditions are as follows:

1. Condition 1 is imposed to ensure that the Works are built and operated in the manner in which they were described for review and upon which approval was granted. This condition is also included to emphasize the precedence of conditions in the Approval and the practice that the Approval is based on the most current document, if several conflicting documents are submitted for review. The condition also advises the Owners their responsibility to notify any person they authorize to carry out work pursuant to this Approval, of the existence of this Approval.
2. Condition 2 is included to ensure that the Works will be operated, maintained and equipped

to comply with the terms and conditions of this Approval, such that the environment is protected.

3. Condition 3 is included to ensure that the Works will be operated, maintained, staffed and equipped in a manner enabling compliance with the terms and conditions of this Approval, such that the environment is protected and deterioration, loss, injury or damage to any person or property is prevented.
4. Condition 4 is included to ensure that the Ministry is immediately informed of the occurrence of an emergency or an otherwise abnormal situation so that appropriate steps are taken to address the immediate concerns regarding the protection of public health and the minimizing of severity of environmental damage and to be able to devise an overall abatement strategy to prevent long term degradation and the re-occurrence of the situation.
5. Condition 5 is included to ensure that accurate information is readily available so that a proper and accurate assessment of the operating performance of the Works may be conducted and that appropriate measures be taken should the operating performance of the Works not be satisfactory.
6. Condition 6 is included to set out the required reporting procedures which will allow both the Owner and the Ministry to be kept informed of the status of the Works and any modifications being carried out under this Approval and of the operations of the Works as it relates to meeting the requirements of this Approval. These conditions emphasize the necessity for proper operation and maintenance as well as care and accuracy in reporting the required information.
7. Condition 7 is included to ensure that the Owner will implement the Spill Contingency Plan, such that the environment is protected and deterioration, loss, injury or damage to any person(s) or property is prevented.

Schedule A

(Facility Names & Site Locations)

1. Bradford Cardlock, Outlet #34041, 436 Dissette Street, Bradford, Ontario.
2. Brampton Petro-Pass, Outlet #42377, 25 Vankirk Drive, Brampton, Ontario.
3. Chatham Bulk Plant, Outlet #4150, 280 Richmond Street, Chatham, Ontario.
4. Concord Petro-Pass, Outlet #42457, Block 19, Plan 65M-2696, north west Creditstone Road and MacIntosh Boulevard, Vaughan, Ontario.
5. Dryden Bulk Plant, Outlet #35368, 274 Government Road, Dryden, Ontario.
6. Dryden Petro-Pass, Outlet #42491, Part 3, Concession 6, Unorganized Township of Van Horne, Ontario.
7. Dunnville Cardlock, Outlet # 04056, 302 Ramsey Drive, Dunnville, Township of Moulton, Ontario.
8. Essex Bulk Plant, Outlet #33177, Corner of Maidstone Avenue and Allen Avenue, 190 Maidstone Avenue, Town of Essex, Ontario.
9. Exeter Bulk Plant, Outlet #04105, 315 Main Street North, Exeter, Township of Hay, Ontario.
10. Flamborough Cardlock, Outlet 04060, 590 Highway #5, Flamborough, Ontario.
11. Glencoe Cardlock, Outlet # 04153, 87 Main Street (Highway 80), Lot 24, Conc. R.2, N. L. R., Glencoe, Ontario.
12. Guelph Cardlock, Outlet # 04078, Part of Lots 75 and 76, Reference Plan 618, 504 Imperial Road North, Guelph, Ontario.
13. Hagersville Bulk Plant, Outlet #4076, Regional Road No. 9, Hagersville, Ontario.
14. Hamilton Petro-Pass, Outlet #42475, 15 Windermere Road, Hamilton, Ontario.
15. Huntsville Bulk Plant and Cardlock Facility (former Huntsville Bulk Plant), Outlet #4164, 86 Hanes Road, Huntsville, Ontario.
16. Ignace Petro-Pass, Outlet #42477, 0.5 mi west of Ignace, Highway No. 17, Ignace Subdivision.
17. Kaministiquia Petro-Pass, Outlet #34567, Part of Lot 31, Concession 'A', Highway No. 17 and Highway No. 11, District of Thunder Bay, Ontario.

18. Kenora Bulk Plant and Cardlock Facility, Outlet #35367, Part of Lot 4, Concession 7, Redditt Road, Town of Jaffray Melick, Ontario.
19. Kingston City Cardlock, Outlet #35326, 1586 Centennial Drive, Kingston, Ontario.
20. Kitchener Petro-Pass, Outlet #42479, Lots 9 and 10, Registered Plan No. 1666, 120 Conestoga College Boulevard, Conestoga College Boulevard and Pinnacle, Kitchener, Ontario.
21. Listowel Bulk Plant, Outlet #04132, King's Highway No. 86, Listowell, Ontario.
22. London-Clarke Road Petro-Pass, Outlet #42466, 660 Clarke Road, London, Ontario.
23. London-Wilton Grove Road Petro-Pass, Outlet #42454, 825 Wilton Grove Road, London, Ontario.
24. Milton Petro-Pass, Outlet #42456, 615 Steeles Avenue at Harprop Street, Milton, Ontario.
25. Mississauga Petro-Pass, Outlet #33250, 6086 Atlantic Drive, Mississauga, Ontario.
26. Mississauga Petro-Pass, Outlet #42511, 7300 Dixie Road, Mississauga, Ontario.
27. Mount Forest Cardlock, Outlet #04091, 6892 Highway 89 West, Township of Wellington North, Ontario.
28. Napanee Bulk Plant and Cardlock, Outlet #50947, 371 Centre Street North, Town of Napanee, Ontario.
29. New Liskeard Petro-Pass, Outlet #42352, Highway No. 11, New Liskeard, Ontario.
30. Newmarket Bulk Plant, Outlet #35730, 1172 Twinney Drive, Town of Newmarket, Ontario.
31. Norwich Cardlock, Outlet # 04119, 773056 Highway 59, Lot 7, Conc. 6, Township of Norwich, Ontario.
32. Orangeville Bulk Plant, Outlet #33099, Intersection of Richardson Road and Shaw Creek Road, 490 Richardson Road, Town of Orangeville, Ontario.
33. Orono Petro-Pass, Outlet #42474, Lot 24, Concession 8, 8226 Highway No. 115, Township of Clark, Ontario.
34. Oshawa Bulk Plant, Outlet #4033, 191 Wentworth Street, Oshawa, Ontario.
35. Ottawa-Nepean Petro-Pass, Outlet #42460, Part of Lot 26, Concession 'A', 1985 Merivale Road, former City of Nepean, now in the City of Ottawa, Ontario.
36. Owen Sound Cardlock Facility, Outlet #4084, Lot 17, Concession 3, Township of Georgian

Bluffs, Ontario.

37. Pembroke Bulk Plant, Outlet #4015, 622 River Road, Pembroke, Ontario.
38. Peterborough Bulk Plant, Outlet #33243, 660 The Queensway, Peterborough, Ontario.
39. Petrolia Bulk Plant, Outlet # 04151, Highway 21 (4254 Oil Heritage Road), Petrolia, Ontario.
40. Pickering Petro-Pass, Outlet #42379, 1750 Alliance Road, Pickering, Ontario.
41. Red Lake Bulk Plant and Cardlock Facility, Outlet #35329, Part of Mining Claim K-1373, 84 Hammel Road, Township of Heyson, Ontario.
42. Rexdale Bulk Plant, Outlet #4048, 1741 Albion Road, Toronto, Ontario.
43. Rockton Cardlock Facility, Outlet #04021, 1597 4th Concession Road, Rockton, Ontario.
44. Sarnia Petro-Pass, Outlet #42467, 1741 London Line Road, Lot 13, Concession 6, City of Sarnia, Ontario.
45. Sioux Lookout Petro-Pass, Outlet #42476, 2 Moosehead Road, Block 10, Plan M-747, Sioux Lookout, Ontario.
46. St. Catharines Bulk Plant and Cardlock Facility, Outlet #04062, 180 Cushman Road, St. Catharines, Ontario.
47. St. Thomas Cardlock Facility, Outlet #4123, Harper and South Edgeware Roads, St. Thomas, Ontario.
48. Sudbury Bulk Plant, Outlet #35751, 1000 Barrydowne Road, Sudbury, Ontario.
49. Sudbury Petro-Pass, Outlet #42509, 3070 Regent Street, Lot 3, Concession 6, City of Greater Sudbury, Ontario.
50. Summerstown-Cornwall Petro-Pass, Outlet #42506, Part of Lot 14, Concession 2, County Road No. 27, Township of South Glengarry, Ontario.
51. Thames Centre Petro-Pass, Outlet #10451, 3305 Dorchester Road, Lot 19, Concession 1 S.R.T., Thames Centre, Ontario.
52. Thunder Bay Petro-Pass, Outlet #33066, 720 Hewitson Street at Roland Street, Thunder Bay, Ontario.
53. Timmins Bulk Plant, Outlet #33121, 364 Moneta Avenue, Timmins, Ontario.
54. Toronto-North York Petro-Pass, Outlet #42495, 4747 Steeles Avenue West and Rossdean,

Toronto, Ontario.

55. Vaughan Petro-Pass, Outlet #42478, 9301 Regional Road No. 50 at Rutherford Road, Part of Lot 16, Concession 10, City of Vaughan, Ontario.
56. Waterloo Bulk Plant, Outlet #4070, 155 Roger Street, Waterloo, Ontario.
57. Wingham Bulk Plant, Outlet #4183, 50 North Street West, Wingham, Ontario.
58. Woodstock Bulk Plant, Outlet #04120, 8 Churchill Place, Woodstock, Ontario.
59. Simcoe Cardlock Outlet #04075, 300 Fourteenth Street, Simcoe, Ontario.
60. Stayner Cardlock Outlet #42443, Ontario Street, Lot 24, Conc. 2, Part 6, Stayner, Township of Clearview, Ontario.
61. Fergus Bulk Plant and Cardlock, Outlet #42507, 538 Glengarry Avenue, Township of Centre Wellington, County of Wellington, Ontario.
62. Barrie Bulk Plant and Cardlock, Outlet #04079, 265 Burton Avenue, Barrie, Ontario.
63. Collingwood Bulk Plant, Outlet #4081, 387 Raglan Street, Collingwood, Ontario.
64. Bothwell Bulk Plant, Outlet #04142, 15807 Longwoods Road, Chatham-Kent, Ontario.
65. Brampton Cardlock Facility, Outlet #22015, 2 Intermodal Drive, Brampton, Ontario.
66. Milton Cardlock Facility, Outlet #22053, 7443 Trafalgar Road, Milton, Ontario.
67. Fort Erie Cardlock Facility, Outlet #22045, 1200 Gilmore Road, Fort Erie, Ontario.
68. Burlington Cardlock Facility, Outlet #92046, 5600 Mainway, Burlington, Ontario.
69. Divested Site; Outlet # 22021 removed.
70. Windsor Cardlock Facility, Outlet #22014, 4406 County Road 46, Sandwich South Township, Ontario.
71. Welland Cardlock Facility (Outlet 04057), 286 Lincoln Street, Welland, Ontario.
72. Bay Truck Stop (Outlet 42001), R.R #2, Highway 11 N, North Bay, Ontario.
73. Chatham Cardlock Facility, Outlet #10515, 737 Richmond Street, Chatham, Ontario.
74. Langton Bulk Plant, Outlet #04126, 3089 Norfolk county Highway 59, Langton, Ontario.

75. Stratford Bulk Plant, Outlet# 04115, 191 Frederick Street, Stratford, Ontario.
76. Etobicoke Petro-Pass, Outlet# 33251, 58 North Queen Street, Etobicoke, Ontario.
77. Cookstown Travel Stop, Outlet# 22712, 3535 Highway 89, Cookstown, Ontario.
78. Clarington Integrated Travel Stop, Outlet# 22726, 2475 Energy Drive, Municipality of Clarington, Regional Municipality of Durham.

Schedule B

BEST MANAGEMENT PRACTICE OIL-WATER SEPARATOR SYSTEMS AT SUNCOR ENERGY INC. PETROLEUM STORAGE AND DISTRIBUTION FACILITIES (CARDLOCKS, KEYLOCKS, BULK PLANTS AND PETRO-PASS) HANDLING PETROLEUM PRODUCTS IN ONTARIO

TABLE OF CONTENTS

- 1. Introduction**
 - 1.1 Application and Purpose
 - 1.2 Description of Typical Facility
- 2. System Operation**
- 3. Operating Requirements**
 - 3.1 General Requirements
 - 3.2 Daily Requirements
 - 3.3 Weekly Requirements
- 4. System Maintenance**
 - 4.1 Separator Cleaning
 - 4.2 Preparation for Winter/Spring Operation
 - 4.2.1 Winter Shut-down
 - 4.2.2 Spring Start-Up
 - 4.3 Liquid Waste Disposal
- 5. Record Keeping**
- 6. Training**
- 7. Emergency Response**

1. Introduction:

1.1 Application and Purpose:

The operator of a petroleum marketing facility has the responsibility to ensure compliance with all Federal, Provincial Acts and Regulations and Municipal By-Laws, applicable to effluent discharges into sewer systems. To assist operators to minimize the risk of pollutants entering into sewer systems, this Best Management Practice (BMP) shall be followed. Should there be any discrepancy between this Best Management Practice and applicable Federal, Provincial Acts and Regulations and/or Municipal By-Laws, the Acts, Regulations and/or By-Laws take precedence.

In Ontario, an Approval must be obtained from the Ministry of the Environment, Conservation and Parks, for installing, making changes to, and operating an oil/water separator at Cardlocks, bulk plants and Petro-Pass facilities prior to discharge to a storm sewer, ditch or elsewhere in the natural environment. The generic Approval will reference this BMP document and its requirements shall be followed.

1.2 Description of Typical Facility:

Oil/water separators are installed by Suncor Energy Inc. to prevent environmental impacts (i.e. discharge of product into the sewer system and waterways) in the event of a spill.

Catch basins and trenches or other storm water collection devices in the product handling areas and tank dykes, will be connected to the separator. Other catch basins in non-product handling areas on the site will be routed directly to the sewer or ditch, without passing through the separator.

Fuels are lighter than water and will float when not disturbed. The separator is designed to slow down the flow and allow any oil entering with the water to float to the top. Some separators are equipped with baffles, corrugated plates or coalescing media to enhance this separation process, while also allowing sludge and particulate to settle out at the bottom of the separator. Water leaves the unit through an opening in the effluent outlet pipe near the bottom of the unit which is well below the top liquid surface of suspended oil

Most separators are equipped with a "shut-off" valve at the outlet to the public sewer or ditch. Some separators also have a valve in the inlet piping. This inlet valve is used to isolate the vessel for safety in the event that it needs to be entered into for maintenance purposes.

Drawings and other information relevant to the operation or maintenance of the system supplied by the manufacturer of the separator or designer of the system must be available for the operator and appropriate site staff.

2. System Operation:

The following practices are recommended to ensure the oil water separator operates as intended:

- remove sludge and oil when they reach the levels specified in the operating procedures;
- allow only fuel and water run-off to enter the separator. Do not dump other liquid wastes into the separator such as used oil, solvents or truck wash water;
- do not allow the oil to become emulsified. This may be caused mechanically by vigorous mixing (e.g. certain types of pumps or pressure washing) or chemically (e.g. introduction of detergents into the system);
- keep bulk plant dyke valves closed. Dyke liquid discharge shall be conducted under operator control;
- Keep the separator shut-off valve open, except at the time of a large spill.

3. Operating Requirements:

3.1 General Requirements:

- Maintain good housekeeping practices to reduce the amount of debris from entering the separator

3.2 Daily Requirements:

- If evidence of a recent spill is discovered, inspect the surrounding portion of the storm water system to determine if petroleum product has migrated into the oil water separator. Measure oil thickness in the separator immediately, and if required, take immediate steps to clean up and report to the appropriate environmental authorities.
- Visually inspect the oil water separator outlet at sites where the discharge is visible.

3.3 Weekly Requirements:

- Visually inspect the contents of the oil water separator.
- Measure the level of oil and sludge in the separator.
- Inspect dyked storage tank area to confirm absence of hydrocarbons, before discharging to the separator and general area (**Bulk Plants Only**).
- Check to ensure water is at the proper operating level, and when not, investigate and return to its proper level as required.
- Inspect water discharge from the oil water separator for sheen and visible hydrocarbons.

4. System Maintenance:

4.1 Separator Cleaning:

Suncor Energy Inc.'s internal policy is to take action when the oil thickness in any compartment of the separator exceeds **10 centimetres**, and/or when the sludge in any compartment exceeds a thickness of **15 centimetres**.

- Oil and a small amount of water beneath the surface shall be skimmed off when oil reaches a thickness of 10 centimetres.
- The separator shall be cleaned out completely when sludge levels reach 15 centimetres. The clean out of the separator would typically include the following steps:
 - (a) vacuum out the oil, water and sludge from all compartments;
 - (b) use fresh water to rinse all compartments;
 - (c) flush containment pad drains and inflow pipes;
 - (d) vacuum out and dispose of the rinse water;
 - (e) inspect the separator, looking for cracks or structural damage;
 - (f) report to Suncor Energy Inc. maintenance;
 - (g) repair any damage as applicable; and
 - (h) restore water to the proper operating level in the separator.
- A licensed waste carrier and disposal company shall handle the removal of the skimmed oil/water mixture and sludge.

4.2 Preparation for Winter/Spring Operation:

Some facilities experience long and severe winters, causing water in the separator to be subject to freezing. A frozen separator will not be able to function for its intended purpose. Accordingly, Suncor Energy Inc. has developed a winter operation procedure for these locations:

4.2.1 Winter Shut Down (commences generally by October 15 each year):

- inspect separator and determine whether conditions warrant winter shut down. If so, proceed to the next steps within this part;

- drain water in the separator to just below the inlet/outlet piping level
- drain pumps as applicable;
- ensure all drains and lines to the separator are free of obstruction;
- the separator is to remain at the lowered winter level, but available to contain spills throughout the winter; and
- keep shut-off valve open.

4.2.2 Spring Start-Up (weather dependent):

- remove accidentally spilled produce over the winter;
- remove snow and contaminated materials from surface;
- inspect separator and clean as required;
- inspect sump and clean as required; and
- refill separator as required.

4.3 Liquid Waste Disposal:

Waste associated with the operation of the oil water separator shall be handled in accordance with Provincial waste management regulatory requirements.

5. Record Keeping:

The operator shall maintain a log book at the site at all times, which shall be made available for inspection and copying by Ministry personnel upon request. Records and log books related to the oil water separator shall be kept at the facility for a minimum of five (5) years. Records of the following shall be maintained:

- weekly visual inspection(for sheen, hydrocarbons) of the water discharge from the oil water separator;
- weekly inspection of the contents of the oil water separator (i.e. dip results for oil and sludge);
- weekly check to ensure that the water is at the proper operating level;
- weekly inspection of the dyke(s) to confirm absence of hydrocarbon before discharging to the separator (**bulk plants only**)

- quantity of oil and sludge removed from the separator;
- date of separator cleanouts;
- date of conversion to winter operation, where applicable;
- date of return to regular oil water separator operation from winter operation, where applicable; and
- spills and other emergencies.

6. Training:

Training of key staff in operations and emergency response is important to ensure that the system operates as intended. Designated facility attendants shall be trained and become familiar with the following:

- requirements of the Best Management Practice and Approval;
- familiarization with the storm water management system (including connections to the sewer at the facility and catch basins connected to the separator);
- the location of the separator outlet shut-off valve and/or control panel for automated systems;
- awareness of the spill contingency plan, including spill reporting requirements;
- how to respond in an emergency;
- dipping and clean out requirements and procedures;
- oil water separator operating requirements and procedures; and
- record keeping requirements.

7. Emergency Response:

In the event of a spill, the first priority is to ensure the safety of employees and the public and to protect the environment. Compliance with reporting spills is required with respect to Provincial and/or Federal Regulations and this Approval where applicable. In addition, the following steps should be taken:

- eliminate the source of the spill;
- use absorbents to immediately contain and absorb as much hydrocarbon as possible. If necessary, for a larger spill, arrangements shall be made to recover spilled hydrocarbons, clean affected area, clean the separator and catch basins as required;
- report to the Site Manager and Suncor Energy Inc. representative;
- a written spill report will be submitted to the regulators, as required; and
- monitor the affected area to ensure clean-up activities have been effective and no further action is required.

Schedule C

1. Application for Environmental Compliance Approval, dated May 19, 2020 and received on July 24, 2020, submitted by David Joyce, Senior Project Engineer of Suncor Energy Inc. on behalf of Suncor Energy Inc.
2. Application for Environmental Compliance Approval, dated January 6, 2023 and received on January 6, 2023, submitted by Yousry Hamdy, P.Eng., Manager, Water and Wastewater of ARCADIS Canada Inc. and signed off by Florian Bernado, Technical Advisor_Asset Management, Suncor Energy Inc. on behalf of Suncor Energy Inc.
3. Application for an amendment of the Environmental Compliance Approval, dated February 2, 2023 and received on February 10, 2023, submitted by MGM Consulting Inc., on behalf of Suncor Energy Inc., along with all other supporting information submitted by MGM Consulting Inc.

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s). 9063-CQFJ4Q issued on April 24, 2023.

In accordance with Section 139 of the *Environmental Protection Act*, you may by written notice served upon me, the Ontario Land Tribunal and in accordance with Section 47 of the *Environmental Bill of Rights, 1993*, the Minister of the Environment, Conservation and Parks, within 15 days after receipt of this notice, require a hearing by the Tribunal. The Minister of the Environment, Conservation and Parks will place notice of your appeal on the Environmental Registry. Section 142 of the *Environmental Protection Act* provides that the notice requiring the hearing ("the Notice") shall state:

- a. The portions of the environmental compliance approval or each term or condition in the environmental compliance approval in respect of which the hearing is required, and;
- b. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

Pursuant to subsection 139(3) of the *Environmental Protection Act*, a hearing may not be available with respect to any terms and conditions in this environmental compliance approval, if the terms and conditions are substantially the same as those contained in an approval that is amended or revoked by this environmental compliance approval.

The Notice should also include:

1. The name of the appellant;
2. The address of the appellant;
3. The environmental compliance approval number;
4. The date of the environmental compliance approval;
5. The name of the Director, and;
6. The municipality or municipalities within which the project is to be engaged in.

And the Notice should be signed and dated by the appellant.

This Notice must be served upon:

Registrar*
Ontario Land Tribunal
655 Bay Street, Suite 1500
Toronto, Ontario
M5G 1E5
OLT.Registrar@ontario.ca

and

The Minister of the Environment,
Conservation and Parks
777 Bay Street, 5th Floor
Toronto, Ontario
M7A 2J3

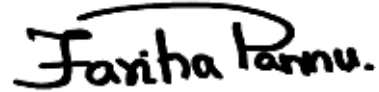
and

The Director appointed for the purposes of
Part II.1 of the *Environmental Protection Act*
Ministry of the Environment,
Conservation and Parks
135 St. Clair Avenue West, 1st Floor
Toronto, Ontario
M4V 1P5

*** Further information on the Ontario Land Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349 or 1 (866) 448-2248, or www.olt.gov.on.ca**

This instrument is subject to Section 38 of the *Environmental Bill of Rights*, 1993, that allows residents of Ontario to seek leave to appeal the decision on this instrument. Residents of Ontario may seek leave to appeal within 15 days from the date this decision is placed on the Environmental Registry. By accessing the Environmental Registry at <https://ero.ontario.ca/>, you can determine when the leave to appeal period ends.

The above noted activity is approved under s.20.3 of Part II.1 of the *Environmental Protection Act*.
DATED AT TORONTO this 22nd day of February, 2024



Fariha Pannu, P.Eng.
Director
appointed for the purposes of Part II.1 of the
Environmental Protection Act

MS/
c: District Manager, MECP York-Durham
Matt Stairs, MGM Consulting Inc.