



O. Reg. 88/22: Air Pollution – Discharge of Sulphur Dioxide from Petroleum Facilities

Section 36: Sulphur Dioxide Emission Minimization Plan

Sarnia Complex, Imperial Oil

December 18, 2023



A handwritten signature in black ink, appearing to be "M.A. Prinsen".

Dec 18/23

Sulphur Dioxide Emission Minimization Plan

This Sulphur Dioxide Emission Minimization Plan was prepared in accordance with Section 36 of O. Reg 88/22 and is provided in Table 1.

The plan includes:

- A description of the proposed measures to be implemented at the Imperial Oil Sarnia Complex (the Complex) to ensure compliance with sections 8 to 17;
- An indication of the anticipated resulting reduction in the amount or concentration of sulphur dioxide discharged into the air from the Complex, and;
- The date by which the measure is expected to be implemented at the Complex.

Table 1: O. Reg 88/22 s36 Sulphur Dioxide Emission Minimization Plan Requirements

O. Reg 88/22 Reference ¹	Description of Proposed Measures to be Implemented	Anticipated Reduction in Sulphur Dioxide (MT/year) ²	Expected Implementation Date
Section 8.2: Thermal Cracking Unit / CO Boiler	Wet Gas Scrubber	5689	January 1, 2029
Section 9: Sulphur Recovery Unit with incinerator	Redirect Sulphur pit gas to SRU feed	14	January 1, 2027
	Design considerations for sparing of the existing Tail Gas Cleanup Unit via the new Wet Gas Scrubber	0	January 1, 2029
Section 13: Flares, mass emission rate of SO ₂	Flare Gas Treating	1010	January 1, 2027

Notes:

1. Only sections applicable to the Complex that require implementation of additional measures to be in compliance with section 8 to 17 during normal, planned operations are included
2. Anticipated reduction is based on difference from reference period, actual reductions will vary from year to year depending on Complex operations. The reference period reflects steady state, normal operations for the Complex (e.g., no turnaround) and does not take into consideration emissions resulting from transient operations