

REPORT

April 2026 B(a)P Sampling Results Above Measured Level Report

Rain Carbon Canada Inc.

Submitted by:

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May 2026

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Table of Contents

1.0 INTRODUCTION	1
2.0 B(A)P MONITORING.....	2
2.1 Facility Conditions During Monitoring	4
3.0 MONITORING RESULTS AND ANALYSIS.....	5
4.0 CONCLUSIONS	8

1. TABLES

Table 1: Summary of April 2026 B(a)P Measurements.....	3
Table 2: Summary of Facility Activities on April 26, 2026, Sampling Date	
Table 3: Summary of Wind Conditions, Facility Operations and Measured B(a)P Concentrations during April 26, 2026,.....	6
Table 4: Conclusions	8

FIGURES

Figure 1: Monitor and Source Locations	2
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1.0 INTRODUCTION

The ambient air monitoring measurements for April 2026 follow **December 12, 2019, Monitoring Plan** for B(a)P and Benzene (the Plan) approved by the Ontario Ministry of the Environment, Conservation and Parks (MECP) on **December 20, 2019**.

As required by the Plan, Rain completed five monitoring events in the month of **April 2026 (April 2, 8, 14, 20 and 26)** and submitted a monthly summary report to the MECP entitled “April 2026 Ambient Air Monitoring Report” (the AAMR).

As presented in the April 2026 AAMR, there was one B(a)P concentration recorded above the 0.0043 µg/m³ Measured Level threshold which triggered the preparation of this report, as set out in the **ECA #7313-8KEN49 Notice No.1 issued November 17, 2022**.

This report includes information on the causes and prevention of future concentrations above the Measured Level threshold. Where possible, this report will include the following items as per the **ECA #7313-8KEN49 Notice No.1 issued November 17, 2022**.

An analysis of what may have caused the B(a)P concentration to be above the Measured Level Threshold.

- Production rate(s) at the time measuring B(a)P concentrations to be above the Measured Level Threshold.
- An assessment of additional equipment, technically feasible methods and operational measures that are available to further minimize the likelihood of measurements above the Measured Level Threshold; and
- A proposed schedule to implement any actions that would minimize the likelihood of measurements above the Measured Level Threshold.

2.0 B(A)P MONITORING

The monitoring program for B(a)P consists of setting up a polyurethane foam (PUF) polyaromatic hydrocarbon (PAH) sampling system at five locations at the Facility, as presented in Figure 1 and also at the HAMN Station 29164. Samples were collected over a 24-hour period. Air quality data acquisition and instrument performance were evaluated by Rain Carbon Canada Inc. personnel. The laboratory analysis was conducted by Bureau Veritas Laboratories, which is ISO17025 compliant and accredited.

Figure 1: Monitor and Source Locations



The B(a)P measurements ranged from < 0.00029 µg/m³ to **0.00649 µg/m³**.

The MECP included a Measured Level threshold as a trigger to evaluate progress on B(a)P emission reduction. This level set by the MECP is not directly related to the ESDM Report results. One of the B(a)P concentrations measured on **April 26, 2026, was above the 0.00430 µg/m³ Measured Level threshold** which triggered the preparation of this report, as set out in the ECA #7313-8KEN49 Notice No.1 issued November 17, 2022, and the measurement was also **above the 0.00500 µg/m³ B(a)P Upper Risk Threshold (URT)**.

Table 1: Summary of April 2026 B(a)P Measurements.

Monitoring Event Date	Measured Concentration [µg/m³]					HAMN STN 29164
	East	North	Old West	South	New West	
April 2	0.00080	<0.00030	0.00234	<0.00032	0.00137	<0.00031
April 8	0.00334	0.00052	0.00200	0.00084	0.00395	<0.00032
April 14	0.00101	<0.00033	0.00071	<0.00033	0.00045	<0.00032
April 20	0.00155	0.00072	<0.00033	<0.00033	<0.00032	<0.00032
April 26	0.00057	<0.00032	0.00243	0.00043	0.00649*	<0.00032

*B(a)P measurement above the 0.00430 µg/m³ B(a)P Measured Level threshold.

2.1 Facility Conditions During Monitoring

The Facility was undergoing the Spring 2026 shutdown during the April 26, 2026, monitoring event and both primary distillation units were shut down and not operating. Table 2 summarizes the daily vehicle loading activities at the Facility during April 26, 2026, monitoring event at the sources previously identified as the main contributors to B(a)P emissions.

Table 2: Summary of Facility Activities on April 26, 2026,

Monitoring Event	Area	Modelling Source ID	Daily Vehicle Loading [US gal]				
			Pitch	Creosote	Naphthalene Oil	LPSB	RT-12
April 26, 2026	Railcar Loading	LS3	0	0	0	0	0
	Truck Loading	LS2	0	0	0	0	0
	Truck Loading	LS4	42,311	0	0	0	0

The daily vehicle loading data is based on information derived from the Systems, Application and Products (SAP) Enterprise Resource Planning software system which tracks the amount of material loaded into trailers and rail cars in kilograms. This data was converted to US gallons, representing the amount of material loaded during the monitoring event (i.e., daily amount loaded). This daily loading data allows for a better representation of Facility conditions during the 24-hour monitoring events.

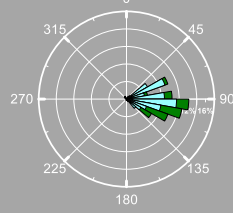
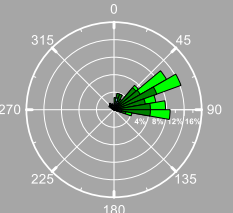
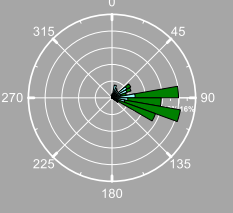
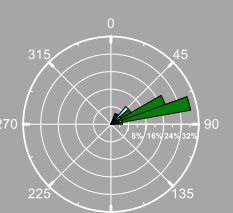
The monitoring and control of loading volumes is part of Standard Operation Procedures (SOPS) for material loading.

3.0 MONITORING RESULTS AND ANALYSIS

At this time, a general correlation between Facility operations and measured concentrations cannot be identified. Although the monitors are located within the Facility's property, their measurements are likely impacted by emissions from other industrial facilities and transportation sources in the vicinity.

Table 3 summarizes April 26, 2026, monitoring results and wind conditions and facility loading operations. The analysis of the results is presented below Table 3.

Table 3: Summary of Wind Conditions, Facility Operations and Measured B(a)P Concentrations during Sunday April 26, 2026

	HAMN Station	Wind Direction & Strength	Overall				
	29171	E, ENE, ESE (Moderate, Strong)		29171		29102	
	29102	E, ENE, NE (Moderate, Strong)					
	29180	E, ESE, ENE (Strong)					
	29565	ENE, NE (Moderate, Strong)	29180	29565			
Facility Operations	Facility Area	Modelling Source ID	Daily Total Amount Loaded [US gal]				
			Pitch	Creosote	Naphthalene Oil	LPSB	RT-12
	Railcar Loading	LS3 (close to Old West and New West Monitors)		0	0	0	0
	Truck Loading	LS2 (close to Old West Monitor)	0	0	0	0	0
Truck Loading	LS4 (close to New West Monitor)	42,311	0	0	0	0	
Measured Concentrations [µg/m³]		East Monitor	North Monitor	Old West Monitor / New West Monitor		South Monitor/STN29164	
		0.00057	< 0.00032	0.00243 / 0.00649		0.00043 / <0.00032	

Sunday April 26, 2026, monitoring event:

The **Sunday, April 26, 2026**, Hamilton site wind direction was from a general **east north easterly** direction over the course of the day. This information is summarized in the table below.

Monitoring Event	April 26, 2026
Wind Strength	Moderate Strong
Main Wind Direction	E, ENE, ESE

The loading activities during April 26, 2026, monitoring event are summarized in the table below.

Monitoring Event	April 26, 2026
Total Volume Loaded from Rail Car Loading LS3 [US gal]	0
Total Volume Loaded from Truck Loading LS2 Spot 1 [US gal]	0
Total Volume Loaded from Truck Loading LS4 Spot 7 [US gal]	42,311

During April 26, 2026, the monitoring event there was no railcar loading activity.

The truck loading LS4 (Truck Loading Spot 7) activity was for 42,311 US gal of coal tar pitch only. There was no truck loading at LS2 (Spot 1).

New West Monitor Measurement on Sunday April 26, 2026

The **0.00649 µg/m³ B(a)P** measurement at the new west monitor on the **Sunday April 26, 2026, monitoring event** was above the 0.00430 µg/m³ Measured Level threshold and above the 24-hour upper risk threshold (URT) of 0.005 µg/m³ B(a)P.

- A “green” coal tar pitch truck/trailer loading audit at LS4 (Truck Loading Spot 7) was conducted on the Sunday April 26, 2026, monitoring event.
- No railcar loading audit was conducted on the Sunday April 26, 2026, monitoring event as no railcars were loaded over this time period.
- The coal tar pitch tank PVRV checks conducted on Sunday April 26, 2026, monitoring event did not reveal any visible fugitive B(a)P emissions.

The wind direction was from a **general east northeasterly direction and an onsite source located to the east northeast of the new west monitor** may have been a source of the **0.00649 µg/m³ B(a)P** measurement at the new west monitor on the Sunday April 26, 2026, MECP monitoring event.

4. CONCLUSION

This report was prepared to fulfill the requirements of the **ECA #7313-8KEN49 Notice No.1 issued November 17, 2022.**

Table 4: Conclusions

	Conclusions
<p>Analysis of what may have caused the B(a)P concentration to be above the Measured Level Threshold.</p>	<p><u>New West Monitor Measurement on Sunday April 26, 2026</u></p> <p>The 0.00649 µg/m³ B(a)P measurement at the new west monitor on the Sunday April 26, 2026, monitoring event was above the 0.00430 µg/m³ Measured Level threshold and above the 24-hour upper risk threshold (URT) of 0.005 µg/m³ B(a)P.</p> <ul style="list-style-type: none"> • A “green” coal tar pitch truck/trailer loading audit at LS4 (Truck Loading Spot 7) was conducted on the Sunday April 26, 2026, monitoring event. • No railcar loading audit was conducted on the Sunday April 26, 2026, monitoring event as no railcars were loaded over this time period. • The coal tar pitch tank PVRV checks conducted on Sunday April 26, 2026, monitoring event did not reveal any visible fugitive B(a)P emissions. <p>The wind direction was from a general east northeasterly direction and an onsite source located to the east northeast of the new west monitor may have been a source of the 0.00649 µg/m³ B(a)P measurement at the new west monitor on the Sunday April 26, 2026, MECP monitoring event.</p>
<p>Loading volumes(s) in US gal at the time measuring B(a)P concentrations to be above the Measured Level threshold.</p>	<p>Details on loading volumes (US gal) are presented in Section 2.0 of this report.</p>

<p>Assessment of additional equipment, technically feasible methods and operational measures that are available to further minimize the likelihood of measurements above the Measured Level threshold and the proposed schedule to implement any actions that would minimize the likelihood of measurements above the Measured Level threshold-</p>	<p>Rain will continue conducting vehicle loading audits on each monitoring day to continue assessing the operations of loading equipment and operators' implementation of Standard Operating Procedures.</p>
	<p>Rain Carbon's Abatement Plan includes installation of fully enclosed automated railcar loading in Q1 2027.</p>

Signature Page



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