REPORT

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

Rain Carbon Canada Inc.

Submitted by:

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1.0 INTRODUCTION

The ambient air monitoring measurements for February 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 three monitoring events in the month of February 2026 (February 3, 15, and 27) and submitted a monthly summary report to the MECP entitled “February 2026 Ambient Air Monitoring Report” (the AAMR).

As presented in the February 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.**

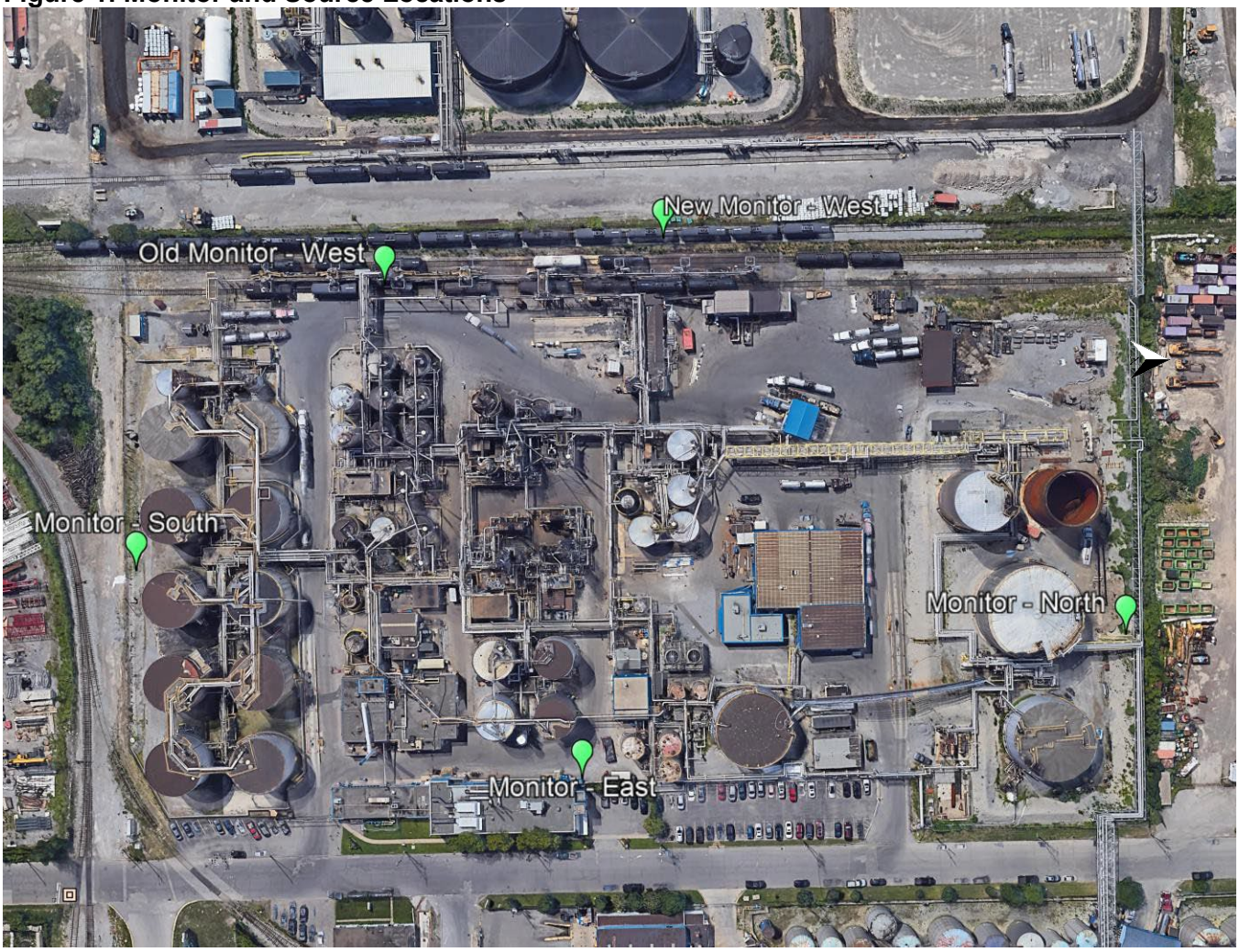
An analysis of what may have caused the B(a)P concentration to be above the Measured Level Threshold.

- 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 **0.00666 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 **February 13, 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 February 2026 B(a)P Measurements.

Monitoring Event Date		Measured Concentration [µg/m³]				
	East	North	Old West	South	New West	HAMN STN 29164
February 1	0.00203	0.00148	0.00068	0.00079	0.00090	0.00217
February 7	0.00186	0.00184	0.00157	0.00167	0.00190	0.00031
February 13	0.00126	0.00158	**0.00666***	<0.00031	0.00265	<0.00030
February 19	<0.00029	<0.00031	<0.00029	0.00162	<0.00031	<0.00032
February 25	0.00045	0.00052	<0.00030	<0.00031	<0.00032	<0.00031

***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 normal operations during February 13, 2026, monitoring event. Table 2 summarizes the daily vehicle loading activities at the Facility during February 13, 2026, monitoring events at the sources previously identified as the main contributors to B(a)P emissions.

Table 2: Summary of Facility Activities on February 13, 2026,

Monitoring Event	Area	Modelling Source ID	Daily Vehicle Loading [US gal]				
			Pitch	Creosote	Naphthalene Oil	LPSB	RT-12
February 13, 2026	Railcar Loading	LS3	52,082	16,601	0	0	0
	Truck Loading	LS2	0	0	0	0	0
	Truck Loading	LS4	11,857	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.

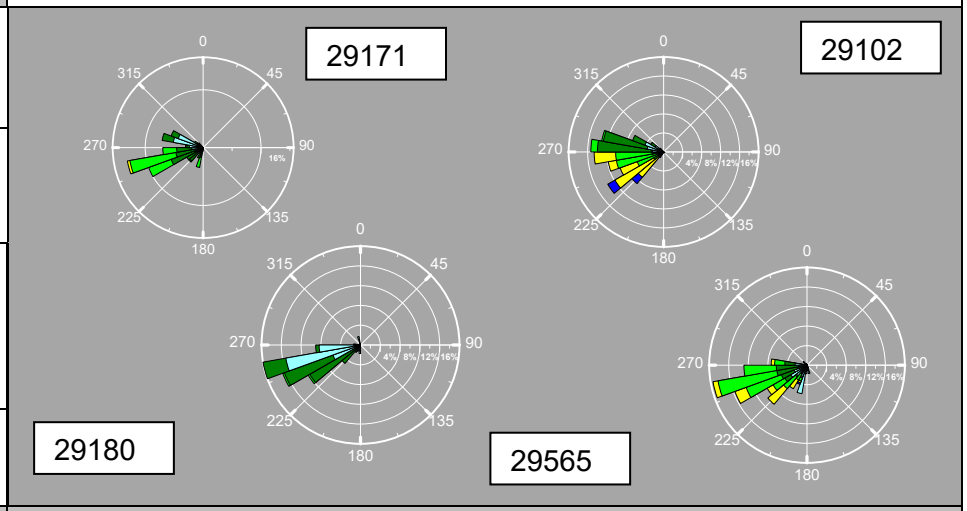
The monitoring and control of loading volumes is part of Standard Operation Procedures (SOPS) for material loading.

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 February 13, 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 Friday February 13, 2026

	HAMN Station	Wind Direction & Strength	Overall
	29171	W, WSW, WNW (Calm, Moderate, Strong)	
	29102	W, WNW, WSW, SW (Calm, Moderate, Strong)	
	29180	W, WSW, SW (Calm, Moderate, Strong)	
	29565	W, WSW, SW (Calm, Moderate, Strong)	

	Facility Area	Modelling Source ID	Daily Total Amount Loaded [US gal]				
			Pitch	Creosote	Naphthalene Oil	LPSB	RT-12
Facility Operations	Railcar Loading	LS3 (close to Old West and New West Monitors)	52,082	16,601	0	0	0
	Truck Loading	LS2 (close to Old West Monitor)	0	0	0	0	0
	Truck Loading	LS4 (close to New West Monitor)	11,857	0	0	0	0

Measured Concentrations [µg/m³]	East Monitor	North Monitor	Old West Monitor / New West Monitor	South Monitor/STN29164
	0.00126	0.00158	**0.00666** / 0.00265	<0.00031/ <0.00030

Friday February 13, 2026, monitoring event:

The **Friday, February 13, 2026,** Hamilton site wind direction was from a general **westerly** direction over the course of the day. This information is summarized in the table below.

Monitoring Event	February 13, 2026
Wind Strength	Calm | Moderate | Strong
Main Wind Direction	WNW, W, WSW, SW

The loading activities during February 13, 2026, monitoring events are summarized in the table below.

Monitoring Event	February 13, 2026
Total Volume Loaded from Rail Car Loading LS3 [US gal]	68,683
Total Volume Loaded from Truck Loading LS2 Spot 1 [US gal]	0
Total Volume Loaded from Truck Loading LS4 Spot 7 [US gal]	11,867

During February 13, 2026, the monitoring event the railcar loading activity was for 52,082 US gal of coal tar pitch and 16,601 US gal of creosote.

The truck loading LS4 (Truck Loading Spot 7) activity was for 11,867 US gal of coal tar pitch only There was no truck loading at LS2 (Spot 1).

Old West Monitor Measurement on Friday February 13, 2026

The **0.00666 µg/m³ B(a)P measurement at the old west monitor on the Friday February 13, 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 Friday February 13, 2026, monitoring event.

- A "green" creosote railcar loading audit at Track 1 Spot 3 was conducted on the Friday February 13, 2026, monitoring event.

- The coal tar pitch tank PVRV checks conducted on Friday February 13, 2026, monitoring event did not reveal any visible fugitive B(a)P emissions.

The wind direction was from a general westerly direction and in the absence of any on site sources, an offsite source located to the west of the old west monitor may have been the likely source of the **0.00666 µg/m³** B(a)P measurement at the old west monitor on the Friday February 13, 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
Analysis of what may have caused the B(a)P concentration to be above the Measured Level Threshold.	**Old West Monitor Measurement on Friday February 13, 2026** The **0.00666 µg/m³ B(a)P measurement at the old west monitor on the Friday February 13, 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 Friday February 13, 2026, monitoring event. A **"green" creosote railcar loading audit** at Track 1 Spot 3 was conducted on the Friday February 13, 2026, monitoring event. The coal tar pitch tank PVRV checks conducted on Friday February 13, 2026, monitoring event did not reveal any visible fugitive B(a)P emissions. The wind direction was from a general westerly direction and in the absence of any on site sources, an offsite source located to the west of the old west monitor may have been the likely source of the **0.00666 µg/m³** B(a)P measurement at the old west monitor on the Friday February 13, 2026, MECP monitoring event.
Loading volumes(s) in US gal at the time measuring B(a)P concentrations to be above the Measured Level threshold.	Details on loading volumes (US gal) are presented in Section 2.0 of this report.
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.	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. Rain Carbon's Abatement Plan includes installation of fully enclosed automated railcar loading in Q1 2027.

Signature Page

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