REPORT

May 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 May 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 **May 2026 (May 2, 8, 14, 20 and 26)** and submitted a monthly summary report to the MECP entitled "May 2026 Ambient Air Monitoring Report" (the AAMR).

As presented in the May 2026 AAMR, there were four B(a)P concentrations recorded above the 0.0043 $\mu g/m^3$ 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.**

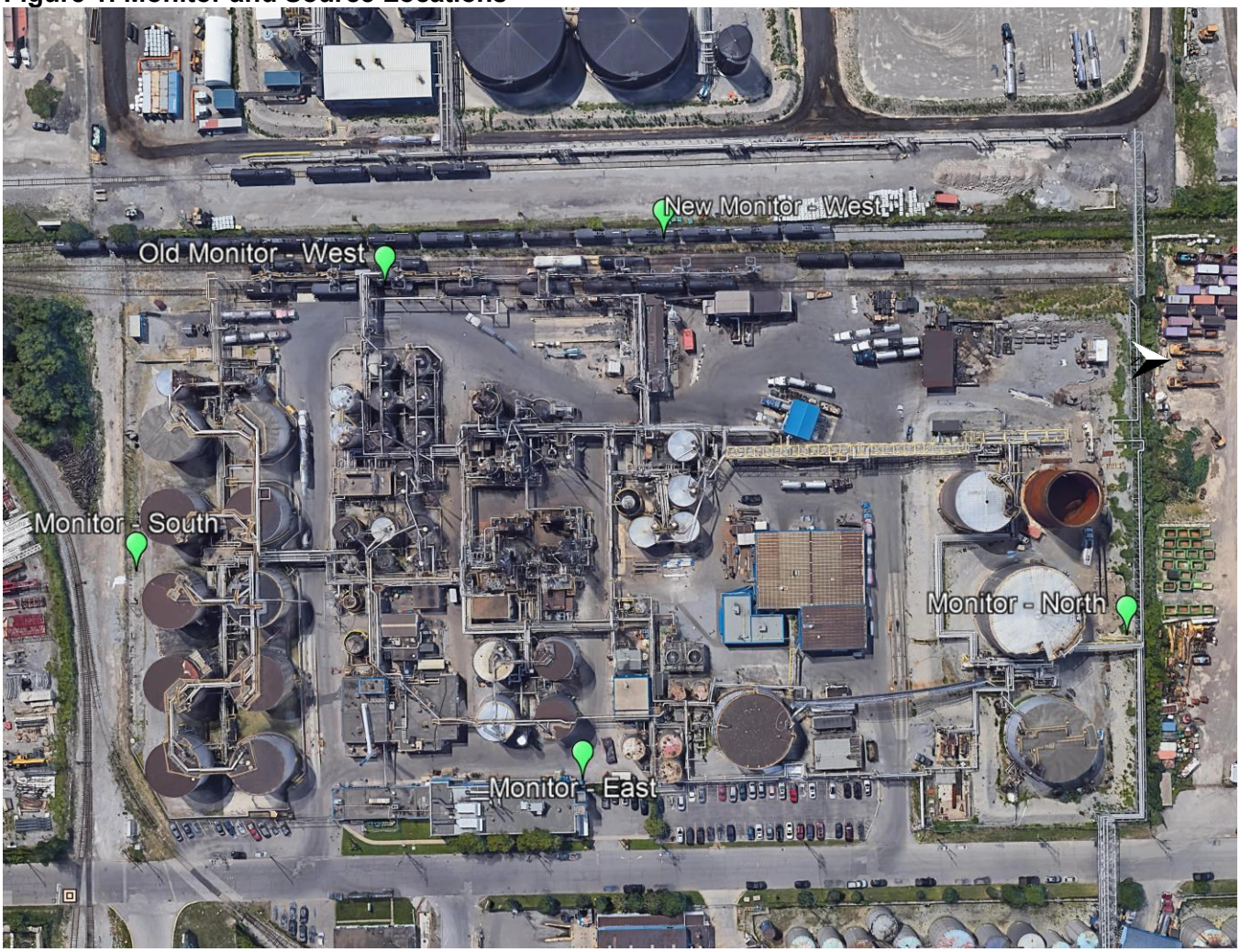
An analysis of what may have caused the B(a)P concentrations to be above the Measured Level Threshold.

- 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



B(a)P measurements ranged from < 0.00029 µg/m^3 to **0.0301 µg/m^3**.

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.

The B(a)P concentrations measured below on **May 8, 14 and 20, 2026**, **were all above the 0.00430 µg/m^3 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 these measurements were also all **above the 0.00500 µg/m^3 B(a)P Upper Risk Threshold (URT)**.

The concentrations of **0.0296 µg/m^3 B(a)P** measured at the **old west monitor** and **0.0116 µg/m^3 B(a)P** measured at the **new west monitor** on the **Friday May 8, 2026, MECP monitoring event** were both above the 0.00430 µg/m^3 B(a)P Measured Level Threshold (MLT) which triggered the preparation of the May 2026 AML report. These measurements were also above the 24-hr Upper Risk Threshold (URT) of 0.0050 µg/m^3 B(a)P which required Section 30 Notifications to the MECP.

The concentration of **0.0138 µg/m^3 B(a)P** measured at the **south monitor** on the **Thursday May 14, 2026, MECP monitoring event** was above the 0.00430 µg/m^3 B(a)P Measured Level Threshold (MLT) which triggered the preparation of the May 2026 AML report. This measurement was also above the 24-hr Upper Risk Threshold (URT) of 0.0050 µg/m^3 B(a)P which required a Section 30 Notification to the MECP.

The concentration of **0.0301 µg/m^3 B(a)P** measured at the **south monitor** on the **Wednesday May 20, 2026, MECP monitoring event** was above the 0.00430 µg/m^3 B(a)P Measured Level Threshold (MLT) which triggered the preparation of the May 2026 AML report. This measurement was also above the 24-hr Upper Risk Threshold (URT) of 0.0050 µg/m^3 B(a)P which required a Section 30 Notification to the MECP.

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

Monitoring Event Date		Measured Concentration [µg/m^3]				
	East	North	Old West	South	New West	HAMN STN 29164
May 2	0.00099	0.00217	0.00094	<0.00034	0.00045	< 0.00031
May 8	0.00081	0.00045	**0.0296***	< 0.00034	**0.0116***	< 0.00031
May 14	0.00147	0.00108	0.00113	**0.0138***	0.00070	< 0.00031
May 20	0.00288	0.00235	0.00129	**0.0301***	0.00120	< 0.00031
May 26	0.00231	0.00238	0.00157	< 0.00033	0.00055	< 0.00031

***B(a)P measurement both above the 0.00430 µg/m^3 B(a)P Measured Level Threshold (MLT) and the 0.0050 µg/m^3 B(a)P Upper Risk Threshold (URT)**

2.1 Facility Conditions During Monitoring

Table 2 summarizes the daily vehicle loading activities at the Facility during May 8, 14 and 20, 2026, monitoring events at the sources previously identified as the main contributors to B(a)P emissions.

Table 2: Summary of Facility Activities on May 8, 2026.

Monitoring Event	Area	Modelling Source ID	Daily Vehicle Loading [US gal]				
			Pitch	Creosote	Naphthalene Oil	LPSB	RT-12
May 8, 2026	Railcar Loading	LS3	52,061	18,551	0	0	0
	Truck Loading	LS2	0	0	0	0	0
	Truck Loading	LS4	15,164	0	0	5,323	0

Table 3: Summary of Facility Activities on May 14, 2026.

Monitoring Event	Area	Modelling Source ID	Daily Vehicle Loading [US gal]				
			Pitch	Creosote	Naphthalene Oil	HAO	RT-12
May 14, 2026	Railcar Loading	LS3	17,353	16,152	0	16,152	0
	Truck Loading	LS2	0	0	0	0	0
	Truck Loading	LS4	82,969	0	0	0	0

Table 4: Summary of Facility Activities on May 20, 2026.

Monitoring Event	Area	Modelling Source ID	Daily Vehicle Loading [US gal]				
			Pitch	Creosote	Naphthalene Oil	LPSB	RT-12
May 20, 2026	Railcar Loading	LS3	31,424	32,304	0	0	0
	Truck Loading	LS2	0	0	19,307	0	0
	Truck Loading	LS4	63,345	0	0	4,807	13,771

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

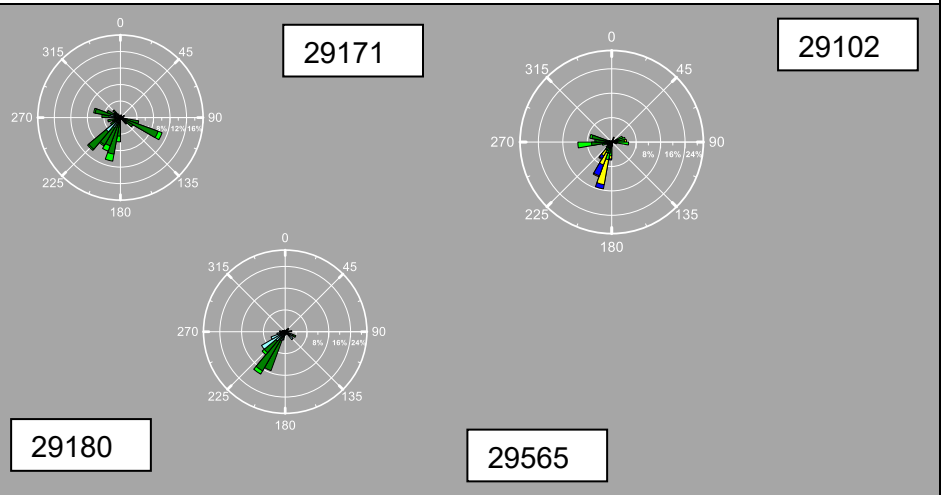
At this time, a general correlation between Facility operations and measured concentrations cannot be identified. Although the monitors are located within the Facility's property, their measurements are likely impacted by emissions from other industrial facilities and transportation sources in the vicinity.

Table 5 summarizes May 8, 2026, monitoring results and wind conditions and facility loading operations. The analysis of the results is presented below Table 7.

Table 6 summarizes May 14, 2026, monitoring results and wind conditions and facility loading operations. The analysis of the results is presented below Table 7.

Table 7 summarizes May 20, 2026, monitoring results and wind conditions and facility loading operations. The analysis of the results is presented below Table 7.

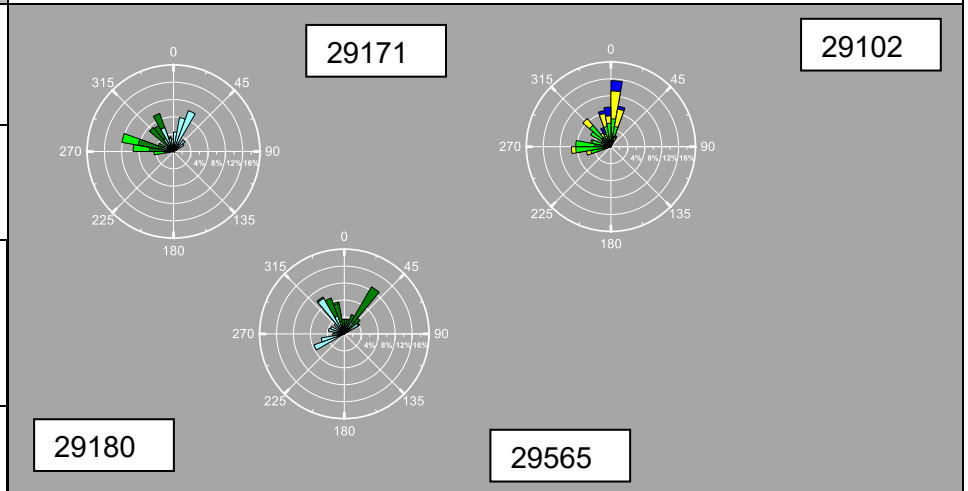
Table 5: Summary of Wind Conditions, Facility Operations and Measured B(a)P Concentrations during Friday May 8, 2026.

	HAMN Station	Wind Direction & Strength	Overall
	29171	SSW, SW, WNW, ESE (Moderate, Strong)	
	29102	W, SSW, WNW, E (Moderate, Strong)	
	29180	SW, SSW (Strong)	
	29565	No measurements	

	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)	52,061	18,551	0	0	0
	Truck Loading	LS2 (close to Old West Monitor)	0	0	0	0	0
	Truck Loading	LS4 (close to New West Monitor)	15,164	0	0	5,323	0

Measured Concentrations [µg/m³]	East Monitor	North Monitor	Old West Monitor / New West Monitor	South Monitor/STN29164
	0.00081	0.00045	**0.0296*** / **0.0116***	< 0.00034 / < 0.00031

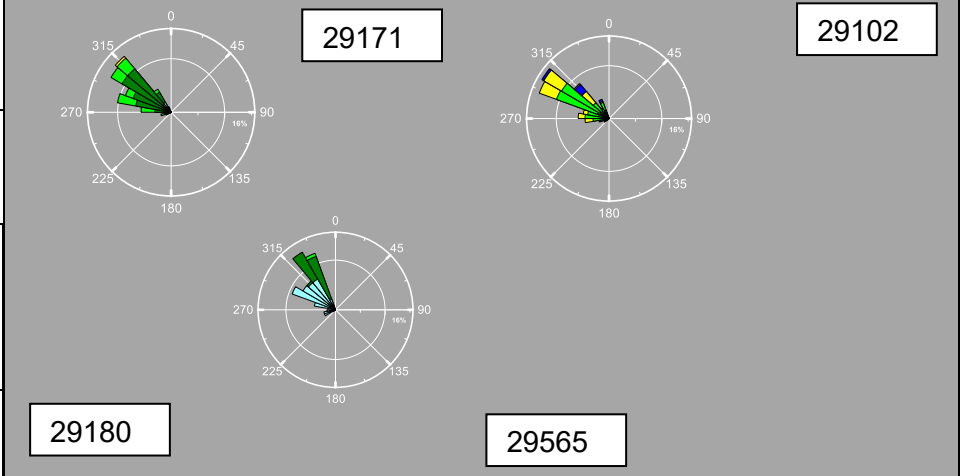
Table 6: Summary of Wind Conditions, Facility Operations and Measured B(a)P Concentrations during Thursday May 14, 2026.

	HAMN Station	Wind Direction & Strength	Overall
	29171	W, WNW, NW, NNW, NNE (Moderate, Strong)	
	29102	W, WNW, NW, NNW, N, NNE (Moderate, Strong)	
	29180	WSW, W, NW, NE (Strong)	
	29565	No measurements	

	Facility Area	Modelling Source ID	Daily Total Amount Loaded [US gal]				
			Pitch	Creosote	Naphthalene Oil	LPSB	HAO
Facility Operations	Railcar Loading	LS3 (close to Old West and New West Monitors)	17,353	16,152	0	0	16,152
	Truck Loading	LS2 (close to Old West Monitor)	0	0	0	0	0
	Truck Loading	LS4 (close to New West Monitor)	82,969	0	0	0	0

Measured Concentrations [µg/m³]	East Monitor	North Monitor	Old West Monitor / New West Monitor	South Monitor/STN29164
	0.00147	0.00108	0.00113 / 0.00070	**0.0138*** / < 0.00031

Table 7: Summary of Wind Conditions, Facility Operations and Measured B(a)P Concentrations during Wednesday May 20, 2026.

	HAMN Station	Wind Direction & Strength	Overall
	29171	NW, WNW (Moderate, Strong)	
	29102	NW, WNW, W (Moderate, Strong)	
	29180	WNW, NW, NNW (Strong)	
	29565	No measurements	

	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)	31,424	32,304	0	0	0
	Truck Loading	LS2 (close to Old West Monitor)	0	0	19,307	0	0
	Truck Loading	LS4 (close to New West Monitor)	63,345	0	0	4,807	13,771

Measured Concentrations [µg/m³]	East Monitor	North Monitor	Old West Monitor / New West Monitor	South Monitor/STN29164
	0.00288	0.00235	0.00129 / 0.00120	**0.0301*** / < 0.00031

Friday May 8, 2026, monitoring event:

The **Friday, May 8, 2026,** Hamilton site wind direction was from a general **south westerly** direction over the course of the day. This information is summarized in the table below.

Monitoring Event	May 8, 2026
Wind Strength	**Moderate | Strong**
Main Wind Direction	**SW, SSW**

The loading activities during May 8, 2026, monitoring event are summarized in the table below.

Monitoring Event	May 8, 2026
Total Volume Loaded from Rail Car Loading LS3 [US gal]	70,612
Total Volume Loaded from Truck Loading LS2 Spot 1 [US gal]	0
Total Volume Loaded from Truck Loading LS4 Spot 7 [US gal]	20,487

During May 8, 2026, the monitoring event the railcar loading activity was for 52,061 US gal of coal tar pitch and 18,551 US gal of creosote.

The truck loading LS4 (Truck Loading Spot 7) activity was for 15,164 US gal of coal tar pitch and 5,323 US gal of LPSB. There was no truck loading at LS2 (Spot 1).

Old West Monitor Measurement on Friday May 8, 2026

The **0.0296 µg/m^3 B(a)P measurement at the old west monitor on the Friday May 8, 2026, monitoring event** was above the 0.00430 µg/m^3 Measured Level threshold and above the 24-hour upper risk threshold (URT) of 0.005 µg/m^3 B(a)P.

- A **"green" coal tar pitch truck/trailer loading audit** at LS4 (Truck Loading Spot 7) was conducted on the Friday May 8, 2026, monitoring event.
- No **railcar loading audit** was conducted on Friday May 8, 2026, monitoring event as no railcars were loaded over this time period.
- The coal tar pitch tank PVRV checks conducted on Friday May 8, 2026, monitoring event did not reveal any visible fugitive B(a)P emissions.

The wind direction was from a **general south westerly direction and an offsite source located to the south west of the old west monitor** may have been a source of the **0.0296 µg/m^3** B(a)P measurement at the old west monitor on the Friday May 8, 2026, MECP monitoring event.

New West Monitor Measurement on Friday May 8, 2026

The **0.0116 µg/m³ B(a)P measurement at the new west monitor on the Friday May 8, 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 May 8, 2026, monitoring event.
- No **railcar loading audit** was conducted on Friday May 8, 2026, monitoring event.
- The coal tar pitch tank PVRV checks conducted on Friday May 8, 2026, monitoring event did not reveal any visible fugitive B(a)P emissions.

The wind direction was from a **general south westerly direction and an offsite source located to the south west of the new west monitor** may have been a source of the **0.0116 µg/m³** B(a)P measurement at the new west monitor on the Friday May 8, 2026, MECP monitoring event.

South Monitor Measurement on Thursday May 14, 2026

The **Thursday, May 14, 2026,** Hamilton site wind direction was from a general **northerly** direction over the course of the day. This information is summarized in the table below.

Monitoring Event	May 14, 2026
Wind Strength	Moderate | Strong
Main Wind Direction	W, WNW, NW, NNW, N, NNE

The loading activities during May 14, 2026, monitoring event are summarized in the table below.

Monitoring Event	May 14, 2026
Total Volume Loaded from Rail Car Loading LS3 [US gal]	49,657
Total Volume Loaded from Truck Loading LS2 Spot 1 [US gal]	0
Total Volume Loaded from Truck Loading LS4 Spot 7 [US gal]	82,969

During May 14, 2026, the monitoring event the railcar loading activity was for 17,353 US gal of coal tar pitch and 16,162 US gal of creosote.

The truck loading LS4 (Truck Loading Spot 7) activity was for 82,969 US gal of coal tar pitch only. There was no truck loading at LS2 (Spot 1).

South Monitor Measurement on Thursday May 14, 2026

The **0.0138 µg/m³ B(a)P measurement at the south monitor on the Thursday May 14, 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 Thursday May 14, 2026, monitoring event.
- A **"green" coal tar pitch railcar loading audit** at LS3 was conducted on the Thursday May 14, 2026, monitoring event.
- The coal tar pitch tank PVRV checks conducted on Thursday May 14, 2026, monitoring event did not reveal any visible fugitive B(a)P emissions.

The wind direction was from **general variable directions with a mean northerly direction and an onsite or an off site source located to the north of the south monitor** may have been a source of the **0.0138 µg/m³** B(a)P measurement at the south monitor on the Thursday May 14, 2026, MECP monitoring event.

South Monitor Measurement on Wednesday May 20, 2026

The **Wednesday, May 20, 2026,** Hamilton site wind direction was from a general **north westerly** direction over the course of the day. This information is summarized in the table below.

Monitoring Event	May 20, 2026
Wind Strength	**Moderate | Strong**
Main Wind Direction	**WNW, NW, NNW**

The loading activities during May 20, 2026, monitoring event are summarized in the table below.

Monitoring Event	May 20, 2026
Total Volume Loaded from Rail Car Loading LS3 [US gal]	63,728
Total Volume Loaded from Truck Loading LS2 Spot 1 [US gal]	19,307
Total Volume Loaded from Truck Loading LS4 Spot 7 [US gal]	81,923

During May 20, 2026, the monitoring event the railcar loading activity was for 31,424 US gal of coal tar pitch and 32,304 US gal of creosote.

The truck loading LS4 (Truck Loading Spot 7) activity was for 63,345 US gal of coal tar pitch, 13,771 US gal of RT-12 and 4,807 US gal of LBSB.

There was 19,307 US gal of naphthalene loaded at truck loading LS2 (Spot 1).

South Monitor Measurement on Wednesday May 20, 2026

The **0.0301 µg/m^3 B(a)P measurement at the new west monitor on the Wednesday May 20, 2026, monitoring event** was above the 0.00430 µg/m^3 Measured Level threshold and above the 24-hour upper risk threshold (URT) of 0.005 µg/m^3 B(a)P.

- A **"green" coal tar pitch truck/trailer loading audit** at LS4 (Truck Loading Spot 7) was conducted on the Wednesday May 20, 2026, monitoring event.
- A **"green" coal tar pitch railcar loading audit** at LS3 was conducted on the Thursday May 14, 2026, monitoring event.
- The coal tar pitch tank PVRV checks conducted on Wednesday May 20, 2026, monitoring event did not reveal any visible fugitive B(a)P emissions.

The wind direction was from a **general north westerly direction and an onsite source located to the north west of the south monitor** may have been a source of the **0.0301 µg/m^3** B(a)P measurement at the south monitor on the Wednesday May 20, 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 8: Conclusions

	Conclusions
Analysis of what may have caused the B(a)P concentration to be above the Measured Level Threshold.	**<u>Old West Monitor Measurement on Friday May 8, 2026</u>** The **0.0296 µg/m³ B(a)P measurement at the old west monitor on the Friday May 8, 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 May 8, 2026, monitoring event. • No **railcar loading audit** was conducted on Friday May 8, 2026, monitoring event as no railcars were loaded over this time period. • The coal tar pitch tank PVRV checks conducted on Friday May 8, 2026, monitoring event did not reveal any visible fugitive B(a)P emissions. The wind direction was from a **general south westerly direction and an offsite source located to the south west of the old west monitor** may have been a source of the **0.0296 µg/m³** B(a)P measurement at the old west monitor on the Friday May 8, 2026, MECP monitoring event. **<u>New West Monitor Measurement on Friday May 8, 2026</u>** The **0.0116 µg/m³ B(a)P measurement at the new west monitor on the Friday May 8, 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 May 8, 2026, monitoring event. • No **railcar loading audit** was conducted on Friday May 8, 2026, monitoring event.

- The coal tar pitch tank PVRV checks conducted on Friday May 8, 2026, monitoring event did not reveal any visible fugitive B(a)P emissions.

The wind direction was from a **general south westerly direction and an offsite source located to the south west of the new west monitor** may have been a source of the **0.0116 µg/m³** B(a)P measurement at the new west monitor on the Friday May 8, 2026, MECP monitoring event.

South Monitor Measurement on Thursday May 14, 2026

The **0.0138 µg/m³ B(a)P measurement at the south monitor on the Thursday May 14, 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 Thursday May 14, 2026, monitoring event.
- A **"green" coal tar pitch railcar loading audit** at LS3 was conducted on the Thursday May 14, 2026, monitoring event.
- The coal tar pitch tank PVRV checks conducted on Thursday May 14, 2026, monitoring event did not reveal any visible fugitive B(a)P emissions.

The wind direction was from **general variable directions with a mean northerly direction and an onsite or an off site source located to the north of the south monitor** may have been a source of the **0.0138 µg/m³** B(a)P measurement at the south monitor on the Thursday May 14, 2026, MECP monitoring event.

South Monitor Measurement on Wednesday May 20, 2026

The **0.0301 µg/m³ B(a)P measurement at the new west monitor on the Wednesday May 20, 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 Wednesday May 20, 2026, monitoring event.
- A **"green" coal tar pitch railcar loading audit** at LS3 was conducted on the Thursday May 14, 2026, monitoring event.

	• The coal tar pitch tank PVRV checks conducted on Wednesday May 20, 2026, monitoring event did not reveal any visible fugitive B(a)P emissions. The wind direction was from a **general north westerly direction and an onsite source located to the north west of the south monitor** may have been a source of the **0.0301 µg/m³** B(a)P measurement at the south monitor on the Wednesday May 20, 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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