

SERVICING BRIEF

Arlanxeo Canada Inc.

Part of Lot 4, Registrars Compiled Plan 725
City of Sarnia



Updated July 10, 2019

Prepared by B. M. Ross & Associates on behalf of Arlanxeo Canada Inc.

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File No. 18029

SERVICING BRIEF

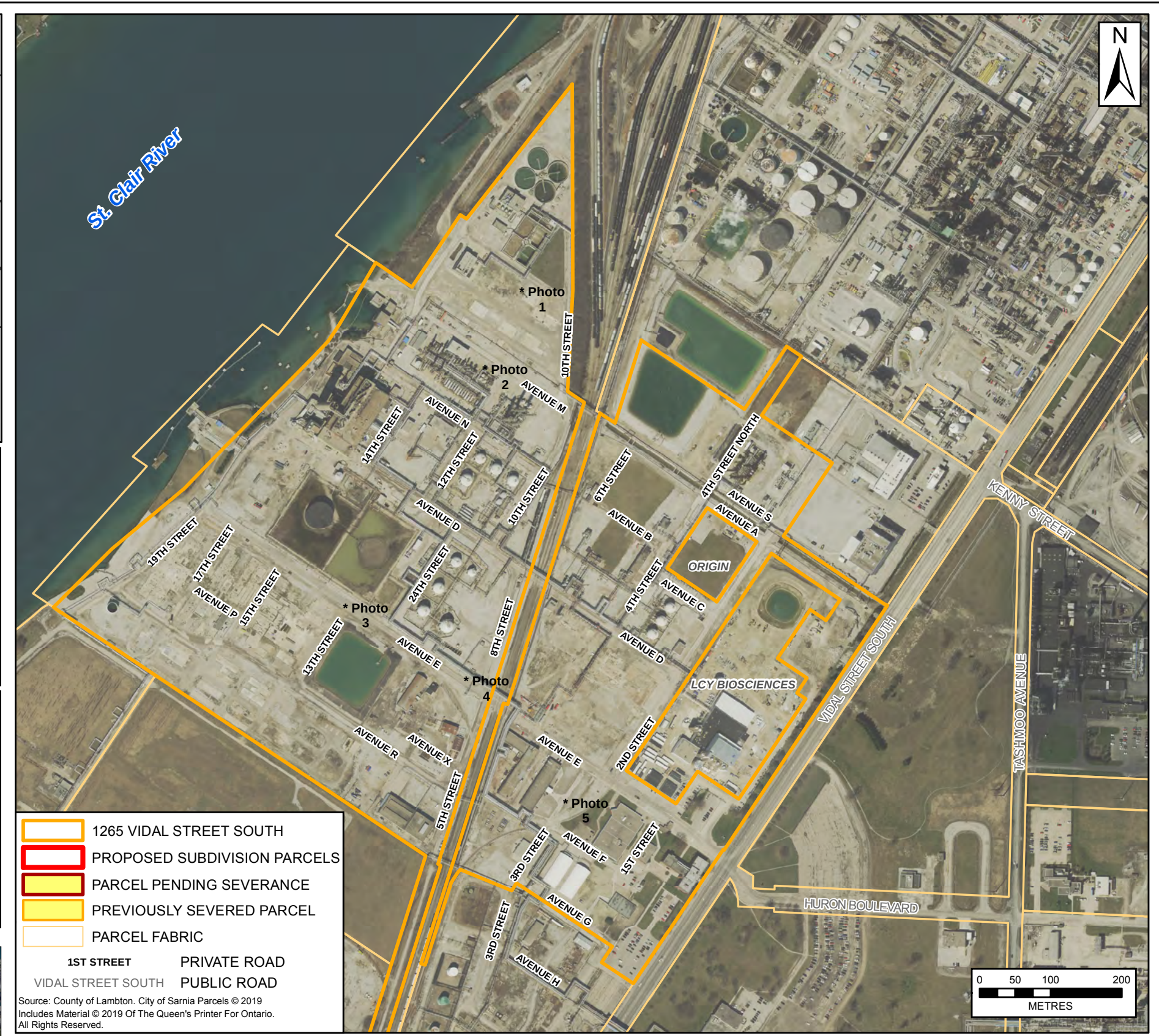
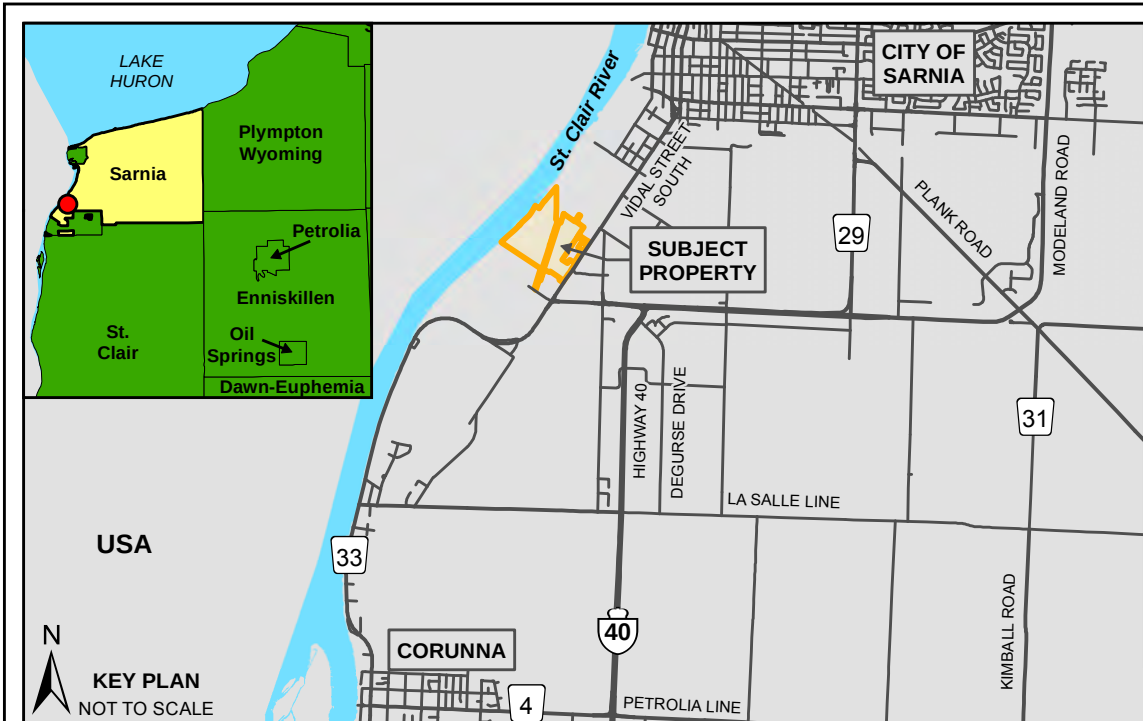
ARLANXEO CANADA INC. 1265 VIDAL STREET SOUTH – CITY OF SARNIA

1.0 INTRODUCTION

Arlanxeo Canada Inc. is a chemical manufacturing facility that produces high performance rubber for use in the automotive, tire, electrical, construction, and oil and gas sectors. The Sarnia facility has seen a number of manufacturing improvements implemented in recent years, creating vacant brownfield areas within their site that are surplus to their current manufacturing needs. The company is developing a Bio-Industrial Park at the site for chemical manufacturers that utilize natural products in their manufacturing processes. A proposed Plan of Subdivision is planned for the site to identify existing developed lots as well as vacant brownfield lots and market them to chemical manufacturing facilities seeking a serviced location with road, rail and water access. This servicing brief will summarize the current services available at the site and also describe how the proposed lots will be serviced.

The subject lands are located within the City of Sarnia and are situated adjacent to the southwest settlement limits, in a heavy industrial area on lands owned by Arlanxeo Canada Inc. The subject property is described as Part of Lot 4, Registrars Compiled Plan 725, City of Sarnia, County of Lambton, which fronts on Vidal Street South in Sarnia. The entire Arlanxeo site on the west side of Vidal Street is 60.6 ha (149.66 acres) in size and has been utilized for heavy industrial manufacturing for over 75 years. Figure 1.1 illustrates the location of the Arlanxeo site within the City of Sarnia.

The proposed Plan of Subdivision will include existing developed sites as well as vacant brownfield locations within the existing Arlanxeo property located at 1265 Vidal Street South. A total of 13 developed (23.8 ha) and 7 vacant lots (16.9 ha), totaling 40.7 ha (100.6 acres) in size will be created as part of the plan. Figure 1.2 shows the proposed lots to be created as part of the Plan of Subdivision process as well as previous lots severed from the site. Table 1.1 summarizes the lots to be created, their size, and current use. Figure 1.3 (attached) identifies specific site uses for the proposed lots to be created.



1265 VIDAL STREET SOUTH

PROPOSED SUBDIVISION PARCELS

PARCEL PENDING SEVERANCE

PREVIOUSLY SEVERED PARCEL

PARCEL FABRIC

1ST STREET

VIDAL STREET SOUTH

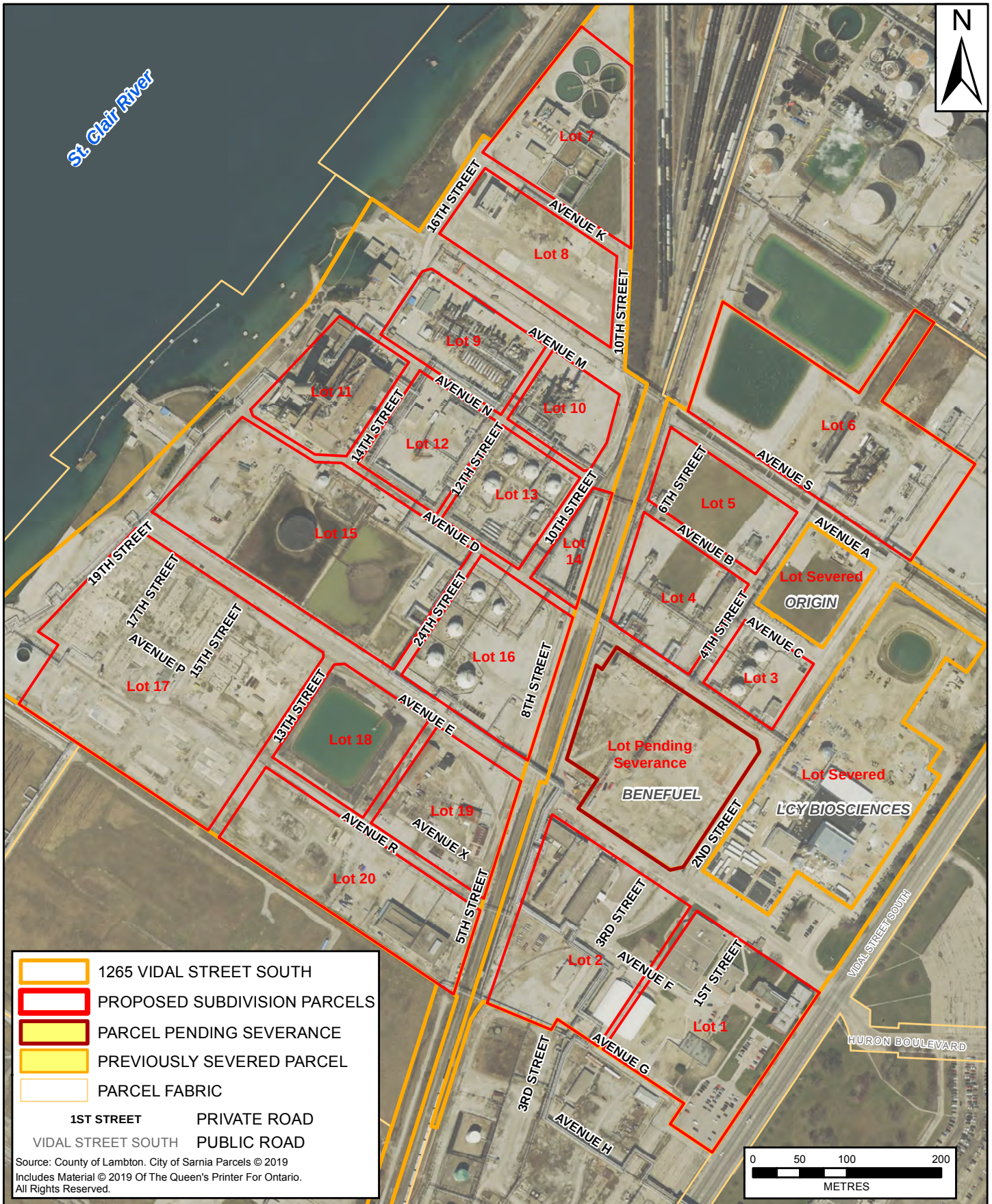
PRIVATE ROAD

PUBLIC ROAD

Source: County of Lambton, City of Sarnia Parcels © 2019

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	ARLANXEO CANADA INC. PROPOSED SUBDIVISION PARCELS	DATE JUNE, 2019	PROJECT No. 18029
		SCALE 1 : 5,500	FIGURE No. 1.2



	ARLANXEO CANADA INC. PROPOSED PARCELS - CURRENT USE	DATE JUNE, 2019	PROJECT No. 18029
		SCALE 1 : 5,500	FIGURE No. 1.3

Table 1.1
Proposed Subdivision Lots and Uses

Lot	Size (m²)	Size (ha)	Current Use	Anticipated Use
1	29370	2.9	Arlanxeo Administration Buildings	Future Sale
2	28860	2.9	Vacant Storage Buildings	Immediate Sale
3	7090	0.7	Existing storage tanks and BIOX pump pit	Future Sale
4	13680	1.4	Hydrogenation Unit and associated infrastructure	Future Sale
5	11790	1.2	Leased to Origin Materials for wood fibre storage	Future Sale
6	38870	3.9	North brine pond & Butadiene extraction unit	Future Sale
7	21120	2.1	Biological Oxidation Plant (Biox) facility	Future Sale
8	16340	1.6	2/3 Vacant and sludge dewatering on west end	Immediate Sale
9	13490	1.3	Former Isobutylene Unit (vacant)	Immediate Sale
10	8570	0.9	BE 3 Unit	Future Sale
11	13610	1.4	Steam and Power Plant (Transalta)	Future Sale
12	11690	1.2	Olefins Infrastructure	Future Sale
13	11640	1.2	Storage tanks	Future Sale
14	4760	0.5	Railcar Loading Rack	Future Sale
15	43410	4.3	Stormwater retention lagoons	Future Sale
16	21420	2.1	Storage tanks	Future Sale
17	56250	5.6	Vacant	Immediate Sale
18	14490	1.4	South Brine Pond	Immediate Sale
19	15720	1.6	Service garages	Immediate Sale
20	25800	2.5	Maintenance shop (east end), vacant (west end)	Immediate Sale

The purpose of this brief is to provide a summary of the existing services available at the Arlanxeo site and to provide a description of how the lots being created as part of the proposed Plan of Subdivision, will be serviced with potable water, sanitary servicing, stormwater drainage and process wastewater drainage services.

2.0 SANITARY SEWER SERVICING

2.1 Existing Sanitary Sewers

The existing Arlanxeo site is partly serviced by a private gravity sanitary sewer collection system that is connected to the City of Sarnia sanitary collection system. Figure 2.1 illustrates the extent of the current sanitary collection system on the Arlanxeo site.

A 10" (250mm) sanitary sewer enters the Arlanxeo site at the main entrance, opposite Huron Boulevard. Beyond the entrance, the sewer changes to a 6" (150mm) sewer and continues west into the site along Avenue E. The 6" sewer terminates just west of the CSX rail line. Service lines extend from the 6" line into buildings along their route to provide a sanitary outlet for washroom facilities located within various structures.

As the sanitary sewer only services portions of the site, the remainder of the property is serviced by individual sewage holding tanks. Figure 2.1 shows the location of existing active holding tanks on the site. The holding tanks are periodically pumped by Arlanxeo, as required, with the waste material then discharged at a sanitary manhole located south of Avenue E and west of the CSX rail corridor. The waste then enters the Arlanxeo sanitary collection system and ultimately discharges to the City's sanitary collection system.

The recently severed Origin Materials site, located in the north central portion of the Arlanxeo property, will be serviced by a private onsite sewage disposal system.

The Ministry of the Environment Conservation and Parks (MECP) was consulted on the sanitary disposal methods currently in operation at the Arlanxeo site. They indicated that MECP does not require an ECA for holding tanks for sewage so long as it is disposed in a proper sanitary sewer and is handled by an appropriate hauling company; subject to Municipal by-Laws. A copy of meeting notes referring to this are included within Appendix 'A'.

2.2 Proposed Sanitary Servicing

Servicing for the proposed Plan of Subdivision lots will be provided partly through connection to the existing Arlanxeo sanitary collection system and partly through construction of private onsite sewage disposal (septic) systems. Lot 1 is currently serviced. Lot 2, 19 and 20 will be serviced through connection to the existing 6" (150mm) sanitary sewer that is currently located in Avenue E. Lots 15-18 would be serviced through an extension of the 6" (150mm) sewer in Avenue E. Because lots 3, 5, 6 and 9 are not located in proximity to an existing sanitary sewer and have no existing holding tank present, private sewage disposal systems will be installed on each lot. Lots 4, 8, and 10-13 will be serviced through use of existing holding tanks, which are currently utilized at each of the sites, or through installation of private sewage disposal systems. Sizing of the individual systems for each lot would be completed at the time of development of each site, once the staffing needs of the new facilities is known. A sewage permit will be obtained from the Lambton County building department for each private sewage disposal system planned for the site and will be installed by a Licensed Sewage Installer.



ARLANXEO CANADA INC.

**PROPOSED SUBDIVISION PARCELS
AND SANITARY SYSTEM**

DATE
JUNE, 2019

PROJECT No.
18029

SCALE
1 : 6,000

FIGURE No.
2.1

3.0 STORM SEWER SERVICING

3.1 Existing Stormwater Drainage Infrastructure

The entire Arlanxeo site is currently serviced by a stormwater collection system which discharges to the St. Clair River. The collection system is illustrated on Figure 3.1.

Generally, larger capacity collector storm sewers are located within the limits of the internal road network throughout the site. Collector storm sewers range in size from 36" (900mm) adjacent to Avenue E west of the main site entrance, to a 66" (1650mm) storm sewer adjacent to the westerly extent of Avenue E. A majority of the collector storm sewers range in size from 10" (250mm dia.) to 36" (900mm dia.).

At the north extent of the site an open municipal drain (Cut-off Drain) crosses the site from Vidal Street to an outlet at the St. Clair River. The drain discharges surface water runoff from the Cole Municipal Drain, which enters the Sarnia city limits near the southeast corner of the community.

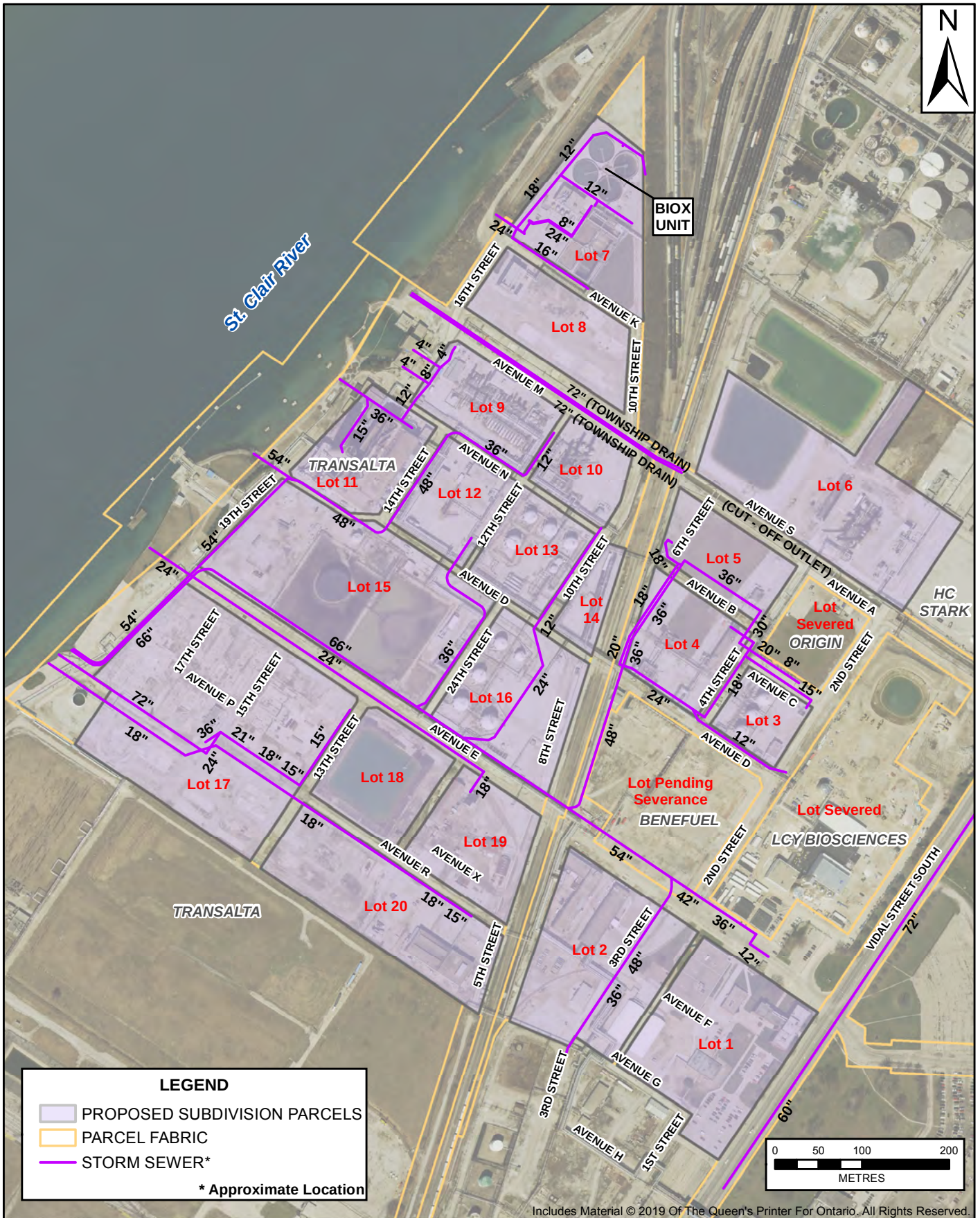
There are five main stormwater outlets to the St. Clair River on the site, along with a number of smaller outlets draining lands located immediately adjacent to the waterfront. These include a 72" (1800 mm dia.), 66" (1650 mm dia.) and 54" (1350 mm dia.) drainage outlet located at the westerly extent of Avenue R. Adjacent to the southwest corner of the site, a 54" (1350 mm dia.) storm drainage outlet is located at the westerly extent of Avenue D, and the Cut-Off Drain outfall is located at the northwest corner of the site, south of the Biox Unit. The stormwater outfalls are tested continuously with the data fed back to the Biox control room for monitoring.

Storm sewers located in the vicinity of the Biox Unit, which treats process wastewater flows emanating from the site, discharge directly to the Biox facility, where they are treated before being discharged to the river.

3.2 Proposed Stormwater Drainage System

Storm drainage servicing for the proposed subdivision lots will be provided partly through on-site drainage infrastructure constructed as part of the proposed industrial site works, with connection to the Arlanxeo stormwater collection system for outlet. The existing Arlanxeo stormwater drainage system has sufficient coverage and capacity to provide drainage outlet to each of the lots proposed as part of the subdivision plan. Each lot was developed at some point in the past and was serviced by the existing storm drainage system. It is therefore not anticipated that capacity issues will develop during servicing of the proposed facilities.

Individual stormwater drainage systems will be reviewed through the Site Plan Approval process as each of the individual properties is developed. An Environmental Compliance Approval will also be required for each lot to ensure that stormwater systems are designed to Ministry of the Environment, Conservation and Parks (MECP) standards.



ARLANXEO CANADA INC.
**PROPOSED SUBDIVISION PARCELS
AND STORMWATER SYSTEM**

DATE
JUNE, 2019

PROJECT No.
18029

SCALE
1 : 6,000

FIGURE No.
3.1

4.0 POTABLE WATER

4.1 Existing Potable Water Distribution System

The potable water distribution system is connected to the City of Sarnia water supply system and enters the Arlanxeo site adjacent to the main entrance at Avenue E. A metering chamber is located just inside the property line to monitor water usage for billing purposes to the City. A majority of the site is serviced by the water distribution system which is illustrated on Figure 4.1.

The internal potable water system has 2 main headers which then have backflow preventers on all takeoff points from those main headers (note that there is no backflow preventer at the city connection on Vidal St due to age, position and size required). All connections to the main system have a backflow preventer which is inspected annually.

The main line entering the site is an 8" (200mm dia.) watermain that extends from Vidal Street, west along Avenue E. Just before crossing the CSX corridor, the watermain decreases in size to a 6" (150mm dia.) watermain. A second 6" watermain extends north from this location, eventually reducing to a 4" (100mm dia.) watermain and a 2" (50mm dia.) before terminating at the north extent of the property.

The 6" watermain on Avenue E continues west over the CSX corridor and then extends north and then west to service structures located in the northwest portion of the site. A 4" line also extends south from this point and then east and west along Avenue R. Smaller diameter service lines extend from the distribution watermain to service individual structures, where required.

4.2 Proposed Watermain Distribution System

Watermain servicing for the proposed Plan of Subdivision lots will be provided through connection to the existing Arlanxeo internal distribution system.

Lots 1 and 2 will be serviced from an existing 8" (200mm dia.) watermain located on Avenue E.

Lots 3-5 will be serviced from an existing 4" (100mm dia.) watermain located on 4th Street.

Lot 6 will be serviced from an existing 4" (100mm dia.) watermain located on Avenue S.

Lots 8 will be serviced from an existing 2" (50mm dia.) watermain located on 16th Street.

Lots 9-13 will be serviced from an existing 6" (150mm dia.) watermain on Avenue N.

Lot 15 will be serviced from an existing 2" (50mm dia.) watermain on 19th Street.

Lots 16-20 will be serviced from 4" watermain on 8th Street and Avenue R.

Modifications to the connection points may be required during development of the individual lots, depending on the site plan of the proposed developments. Individual servicing details will be finalized as part of the Site Plan review process as each lot is developed.



LEGEND

- PROPOSED SUBDIVISION PARCELS
- PARCEL FABRIC
- WATERMAIN*

* Approximate Location



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ARLANXEO CANADA INC.

PROPOSED SUBDIVISION PARCELS AND WATER SYSTEM

DATE
JUNE, 2019

PROJECT No.
18029

SCALE
1 : 6,000

FIGURE No.
4.1

5.0 PROCESS WASTEWATER COLLECTION AND TREATMENT

5.1 Existing Process Wastewater Collection and Treatment System

The existing process wastewater collection system is a separate and distinct collection system from the sanitary sewer and stormwater collection systems serving the Arlanxeo site. The collection and treatment system takes process water used on the site and conveys it to an on-site treatment facility (Biox facility) located at the northwest corner of the property. The wastewater collection system is entirely contained within the Arlanxeo Canada site located at 1265 Vidal Street South and does not connect to the City of Sarnia's sanitary or stormwater collection systems. The process wastewater collection system is illustrated on Figure 5.1.

The wastewater collection system extends through a majority of the active site taking process water to the Biox facility for treatment before discharging treated wastewater to the St. Clair River. Collection lines generally range in size from 12" (300mm dia.) piping to 18" (450mm dia.) with smaller diameter service lines connecting to individual facilities. Catch basins are located at pipe junctions to allow access for maintenance or a change in pipe direction or pipe size.

Process wastewater collected on the south side of the site is initially collected in the Main Oil Separator (MOS), located north of Avenue E, just west of the rail corridor. Wastewater is then pumped from the MOS through an overhead pipe rack system to the Biox treatment facility where it is treated before being discharged to the St. Clair River. A second collection location is situated at the southwest corner of Second Street and Avenue C where wastewater is again collected and then pumped via pipe rack to the treatment facility.

The Biox Facility is an aerobic biological digestion facility designed to treat up to 41,500 m³/day of industrial wastewater. A copy of the current Environmental Compliance Approval (ECA) for the facility, issued on October 8, 1985, is included within Appendix 'A'. The ECA allows the Biox facility to treat third party wastes. A discharge pipe is located along the north extent of the Biox facility which discharges to the Cut-Off Drain outfall located at the northwest corner of the site, south of the Biox Unit.

As noted previously, storm sewers located in the vicinity of the Biox Unit, discharge directly to the Biox facility, where they are treated before being discharged to the river.

5.2 Proposed Process Wastewater Collection System

Process wastewater servicing for the proposed Plan of Subdivision lots will be provided through connection to the existing Arlanxeo wastewater collection and treatment system before being discharged to the St. Clair River through an existing outlet. The existing Arlanxeo process wastewater system has sufficient coverage and capacity to provide an outlet to each of the lots proposed as part of the subdivision plan. Each lot was developed at some point in the past and was serviced by the existing wastewater collection system. Therefore, we do not anticipate that capacity issues will develop during servicing of the proposed facilities.

Individual wastewater systems serving the proposed subdivision lots will be reviewed through the Site Plan Approval process as each of the individual properties is developed. An Environmental Compliance Approval will also be required for each parcel to ensure that wastewater systems are designed to MECP standards.

5.3 Fire Water Supply

A separate and distinct water distribution network functions at the site to provide water for fire protection. Supplied with water from the St. Clair River, the fire water supply network encompasses the site and provides sufficient capacity and pressure as per NFPA 24 standards.

6.0 Summary

Arlanxeo Canada Inc. is a chemical manufacturing facility that produces high performance rubber for use in the automotive, tire, electrical, construction, and oil and gas sectors. The Sarnia facility has seen a number of manufacturing improvements implemented in recent years, creating vacant brownfield areas within their site that are surplus to their current manufacturing needs. The company is developing a Bio-Industrial Park at the site for chemical manufacturers that utilize natural products in their manufacturing processes. A proposed Plan of Subdivision is planned for the site to identify the vacant brownfield parcels and market them to chemical manufacturing facilities seeking a serviced location with road, rail and water access.

The proposed Plan of Subdivision will include existing developed lots as well as vacant brownfield locations within the existing Arlanxeo site located at 1265 Vidal Street South. A total of 11 developed (22.1 ha) and 9 vacant lots (18.6 ha), totaling 40.7 ha (100.6 acres) in size will be created as part of the plan. Figure 1.1 shows the proposed lots to be created as part of the Plan of Subdivision process as well as previous lots severed from the site.

Existing services present on the Arlanxeo site include a sanitary sewage collection system and potable water distribution network, both of which are connected to the City of Sarnia's sanitary collection and watermain distribution network. The site is also serviced by a fire water supply network and a comprehensive stormwater drainage system which encompasses the entire site, discharging to the St. Clair River through monitored outlet locations. A process wastewater collection system is also present on the site which collects and treats process water generated on the property. Wastewater is collected and treated at the Biox Unit, located at the northwest corner of the property, before discharging the treated waste to the St. Clair River.

Given the historic uses of the site, which included complete use of the entire site for chemical manufacturing purposes, it is anticipated that servicing of brownfield lots within the site can be accommodated through the existing collection systems. This Servicing Brief describes how this can be completed in more detail.

Servicing brief prepared by:

B. M. ROSS AND ASSOCIATES LIMITED

Per _____
Kelly Vader, RPP, MCIP

:es

APPENDIX 'A'

BIOX FACILITY ECA



BIOX-3 (E1)

Certificate of Approval (Sewage)
Certificat d'autorisation (eaux usees)

Number Numero 4-002-85-009

Whereas Attendu quePOLYSAR LIMITED.....
of atSOUTH VIDAL STREET, SARNIA, ONTARIO.....

has applied in accordance with Section 24 of the Ontario Water Resources Act for approval of
a fait, conformément à l'article 24 de la loi sur les ressources en eau de l'Ontario, une demande d'autorisation.

to treat at an existing Biological Oxidation Plant, externally generated liquid industrial waste streams containing non-toxic, biodegradable, organic materials, using surplus capacity of the "Biox" Plant (Certificate of Approval No. 4-083-80-006) and consisting of:

1. an existing biological oxidation plant with a hydraulic capacity of 41,500 m³/day
2. an existing pre-treatment system Certificate of Approval No. 4-083-80-006
3. seven unloading locations
4. sludge handling facilities as detailed in Certificate of Approval No. A030107
5. a 100 mm diameter pipeline, approx. five (5) km long, from the biox plant to No. 3 lagoon in the landfill site

all in accordance with the application dated October 15, 1984, reports, plans and all other data submitted by Polysar Limited, subject to the following special terms and conditions which are considered necessary by the undersigned.

SPECIAL TERMS AND CONDITIONS

- 1) Approval of the Sarnia District Office of the Ministry of the Environment shall be obtained for the treatment of each outside waste stream at the biox plant.
- 2) Polysar Limited shall notify the Sarnia District Office of the rejection of any incoming load of outside waste together with reasons for that rejection.
- 3) Polysar Limited shall continuously monitor the discharge to the St. Clair River for Suspended Solids pH, TOC, Phenol, Ammonia and Oil, and shall conduct fish toxicity testing on a monthly basis and flesh tainting and testing on an annual basis.

TRUE COPY OF THE
CERTIFICATE MAILED

OCT - 3 1985

Now therefore this is to certify that after due enquiry the said proposed works have been approved under Section 24 of the Ontario Water Resources Act.

Le present document certifie qu'après vérification en bonne et due forme la construction dudit projet d'ouvrages a été approuvée aux termes de l'article 24 de la loi sur les ressources en eau de l'Ontario. This Certificate supersedes Certificate of Approval No. 4-002-85-008 dated at Toronto May 27th, 1985.

DATED AT TORONTO this
DATE A TORONTO ce

8th

day of
jour d

October

1985

[Signature]

APPENDIX 'B'

MECP CORRESPONDENCE



Meeting Minutes

SUBJECT: Comprehensive ECA Application
Ministry Pre-Consultation

DATE: Friday, June 22, 2019

Attendance:

ArlanxEO

Joseph Lasowski

Heather Micheline

Sarah Macklin

MECP

Erin White

Mike Close

Lane Chevalier

Scott Abernethy (conference call)

Start: 13:00

Concluded: 14:45

Agenda and Minutes

1. Safety Moment

- Reviewed Emergency Exits for location

2. Current Status

- Application based on Origin connection to ArlanxEO Sewer System
- Consolidate several ECAs (and amendments) at facility
- Inclusion of MISA regulatory requirements into new ECA
- West Site is a Bio-Industrial Park; Several third-party companies need access to ArlanxEO combined sewer for discharge/treatment

3. ECA Review

- Scope of Application
 - o Application for West Site facility only (area West of Vidal Street)
 - o Receive sewage from other operational areas not included in scope of application
 - o Only Sewage works ECA; Air, Waste, Waste Handling will NOT be included in scope
 - o All Sanitary (Septic) is sent to municipality; Sewers and holding tanks (pits) will NOT need ECA; Subject to Municipal by-laws
- Operational Flexibility
 - o Request LOF for minor modifications to site
 - o All LOF request will be within permitted scope of Ministry supporting documentation (e.g. chemical modification at BIOX, pumping changes that do not increase capacity, etc.); Operational envelope to be described in LOF report
 - o Need flexibility to allow Third-Party access to existing sewers if already have Ministry approval; Specific condition in ECA may need to be developed as cannot necessarily be handled through LOF
- Effluent Limits
 - o Expectation that MISA effluent limits will be included in final ECA; no additional limits expected at this time
 - o Minor changes to reflect current operation (e.g. removal of Cobalt, additional of chronic testing on all streams); to be finalized with further discussion with Ministry after application
 - o Loading limits for combined multiple streams at Arlanxeo; only single stream is continuously used, however, all existing streams must be able to be used moving forward
- Waste Consolidation
 - o Waste Consolidation NOT recommended to be included in ECA
 - o While potential for updated waste receiver ECA, not able to merge into single document at this time – potential future discussion
 - o LOF and Sewage works will NOT have impact on waste receiver ECA
- Consultation Requirements
 - o Arlanxeo community consultation is expected to be initiated through ACAP (community advisory panel)
 - o Next ACAP meeting scheduled for September; Agenda and invites to be sent out in August
 - o Aamjiwnaang included in ACAP; Additional consultation with other First Nations in area will be required; Specifically Walpole Island

due water ECA; Notice and follow-up will be required as minimum by MECP to meet consultation requirement

- o Other notifications include Sarnia Municipality and Industrial Neighbours
- o Submit Consultation Action Plan with Application

- Application Requirements

- o Review of ECA documentation requirements; Subject to EBR but not EAA
- o As consolidation requests, Ministry agree that several documents will not need to be developed included Hydrogeological Assessment, Effluent Criteria Assessment, Sewage Quantity and Quality Characteristics, Stormwater Management Report, Environmental Impact Analysis
- o MISA reports will be included to support application in lieu of many reports
- o Engineering Documents should not include all detail design; provide enough information (PFD, P&ID) to have understanding of operations, but reference additional drawings available upon further request

4. Next Steps and Action Items

- MECP to provide contact for all First Nation consultation that is required
- Arlanxeo to begin sampling inlet to BIOX to determine if Cobalt can be removed from effluent monitoring
- Arlanxeo is working to have application completed by original September 1, 2019 deadline
 - o Request 8 week extension to October 26, 2019 to submit
 - o Ensure accuracy of request
 - o Able consultation with First Nations to occur prior to application

5. Site Tour

- No site tour was performed; open offer if requested