



Shell Chemical Appalachia LLC
300 Frankfort Rd
Monaca, PA 15061

September 27, 2023

Mark Gorog P.E., Regional Manager Air Quality Program
Pennsylvania Department of Environmental Protection (PADEP)
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222

**RE: PA-04-00740C Recovered Oil and Equalization Wastewater Storage Tanks (Source ID 401)
Excess Emissions Malfunction Report**

Dear Mr. Gorog,

Shell Chemical Appalachia LLC (“Shell”) located in Beaver, Co is submitting this malfunction report to the Pennsylvania Department of Environmental Protection (PADEP) for excess emissions from the flow equalization and oil removal (FEOR) A and B and recovered oil storage tanks between September 1 and September 2, 2023.

This malfunction did not pose an imminent and substantial danger to the public health and safety or the environment.

- **Name and location of the facility**
Shell Polymers Monaca
300 Frankfort Road, Monaca PA, 15061
- **Nature and cause of the incident**
On September 1, 2023 at 17:21, the blower that routes the FEOR A and B and Recovered Oil storage tanks vapor space to the Spent Caustic Thermal Oxidizer¹ (SCTO) tripped offline. Operations initiated troubleshooting and discovered that the blower had experienced an electrical fault and could not be restarted. While the blower was offline, the FEOR and Recovered Oil tanks intermittently vented to atmosphere through the relief valves.
- **Time when the malfunction or breakdown was first observed**
September 1, 2023 at 17:21
- **The date and time that the malfunction started and ended**
Started on September 1, 2023 at 17:21 and ended on September 2, 2023 at 01:02 when the blower was put back in service.
- **An estimate of the emissions associated with the malfunction**

¹ Identified as Spent Caustic Vent Incinerator (Source ID C206) in PA-04-00740C

Pollutant	Emissions (lbs)
Total VOC	0.031
Benzene	0.003
Toluene	0.022
Total HAP	0.030

- The calculations that were used to determine that quantity**
 For reference, the blower for the FEOR A and B and Recovered Oil tanks routes any tank vapors to a closed vent system, where they are incinerated in the SCTO. When the blower is down, the FEOR and Recovered Oil tanks periodically vent to atmosphere through relief valves. Excess emissions from the storage tanks were modeled using Pro-Max equations of state for flashing, breathing, and working losses. Inputs into the model include the storage tank and internal floating roof physical characteristics, measured liquid throughputs using liquid level indicators, measured tank liquid temperatures, pressure of input liquid streams, and representative tank sample data.
- The steps, if any, that the facility took to limit the duration and/or quantity of emissions associated with the malfunction**
 Emissions were minimized by escalation of the blower downtime to the electrical group and getting the blower maintained as soon as possible. Emissions were also minimized through design and operation of the storage tank internal floating roofs and nitrogen blankets.
- A detailed analysis that sets forth the Root Cause of the malfunction, to the extent determinable**
 Shortly after the blower trip, site electricians were contacted to start troubleshooting the issue.

 The electricians discovered a bad fuse and a loose relay. Both issues were addressed, and the blower was able to be put back in service.
- An analysis of the measures, if any, that are available to reduce the likelihood of a recurrence of a malfunction resulting from the same Root Cause or contributing causes in the future**
 No action items stemmed from the result of this investigation.
- To the extent that investigations of the causes and/or possible corrective action(s) still are underway on the due date of the report, a statement of the anticipated date by which a follow-up report will be submitted**
 No follow up report is anticipated.
- Corrective action is final or timeline for implementation**
 N/A

If you have any questions regarding this matter, please contact me at (724) 709-2467 or kimberly.kaal@shell.com.

Sincerely,

Kimberly Kaal
 Environmental Manager, Attorney-in-Fact

CC:
 Scott Beaudway, Air Quality Specialist

Kristin Goddard, Air Quality District Supervisor
Beth Speicher, Environmental Group Manager

Attachment A
Pro-Max Model Inputs and Outputs

Table 1 Downtime Internal Floating Roof Tank Emissions Calculations, ProMax Input Summary
Shell Chemical Appalachia LLC, Monaca Cracker Plant

Timeframe of Analysis

Timeframe start 9/1/2023 17:21 Tank Throughput Calculator FEOR ROT and SC.xlsx
 Timeframe end 9/2/2023 1:02 Tank Throughput Calculator FEOR ROT and SC.xlsx
 Time 7.7 hours
 461 minutes

Tank Data/Sample Data

Tank Name	Tank ID	Contents	Length/ Height (ft)	Diameter (ft)	Temp (C)	Pressure (barg)	Throughput (gal)	Flow Rate (gpm)	Samples Used
FEOR B Tank	T-59707B	Waste Water, sheen of oil	47.9	55.8	26.74	0.01	491.96	1.07	Average of 8/22/2023, 8/29/2023, 9/5/2023, Balance Water
FEOR A Tank	T-59707A	Waste Water, sheen of oil	47.9	55.8	30.02	0.01	46,152.61	100.11	Average of 8/22/2023, 8/29/2023, 9/5/2023, Balance Water
Recovered Oil Tank	T-59708	Slop Oil/water mixture	48	43	28.87	0.01	1,148.20	2.49	5/24/2023, Balance Water
Data source/ assumption			2/2/23 email from A. Binder	2/2/23 email from A. Binder		2/1/2023 email with note from O. Omisakin			

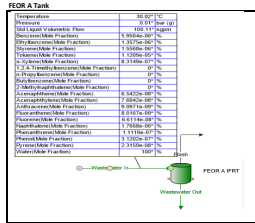
Sample Data

Constituent	8/22/2023 FEOR B		8/29/2023 FEOR B		9/5/2023 FEOR B		Average FEOR B		8/22/2023 FEOR A		8/29/2023 FEOR A		9/5/2023 FEOR A		Average FEOR A		5/24/2023 Recovered Oil Tank	
	mg/L	%	mg/L	%	mg/L	%	mg/L	%	mg/L	%	mg/L	%	mg/L	%	mg/L	%	mg/L	%
Benzene	2.8	0.00028	3.3	0.00033	2.2	0.00022	0.00027667	0.084	0.0000084	0.22	0.000022	0.47	0.000047	0.00002580	24.2	0.00242		
Ethylbenzene	0	0.0000000	0.36	0.000036	0	0.0000000	0.00001200	0.063	0.0000063	0.11	0.000011	0.67	0.000067	0.00008000	32	0.0032		
Styrene	0	0.0000000	0.44	0.000044	0.25	0.000025	0.00002300	0.066	0.0000066	0.12	0.000012	0.084	0.0000084	0.00009900	19.2	0.00192		
Toluene	2.6	0.00026	3.9	0.00039	2.5	0.00025	0.00030000	0.35	0.000035	0.72	0.000072	0.65	0.000065	0.00005733	181	0.0181		
Xylenes	0	0.0000000	0	0.0000000	0	0.0000000	0.00000000	0	0.0000000	0.086	0.0000086	0.061	0.0000061	0.00004900	25.51	0.002551		
1,2,4-Trimethylbenzene	0	0.0000000	0	0.0000000	0	0.0000000	0.00000000	0	0.0000000	0	0.0000000	0	0.0000000	0.00000000	1.16	0.000116		
n-Propyl Benzene	0	0.0000000	0	0.0000000	0	0.0000000	0.00000000	0	0.0000000	0	0.0000000	0	0.0000000	0.00000000	16	0.0016		
Butylbenzene	0	0.0000000	0	0.0000000	0	0.0000000	0.00000000	0	0.0000000	0	0.0000000	0	0.0000000	0.00000000	1.85	0.000185		
2-Methylnaphthalene	0	0.0000000	0	0.0000000	0	0.0000000	0.00000000	0	0.0000000	0	0.0000000	0	0.0000000	0.00000000	10.7	0.00107		
Acenaphthene	0.0049	0.0000049	0.048	0.0000048	0.098	0.0000098	0.00000098	0.0023	0.0000023	0.052	0.0000052	0.0094	0.0000094	0.00000056	0	0.0000000		
Acenaphthylene	0	0.0000000	0.025	0.0000025	0.087	0.0000087	0.00000037	0.0019	0.0000019	0.046	0.0000046	0.013	0.0000013	0.00000065	0	0.0000000		
Anthracene	0	0.0000000	0	0.0000000	0	0.0000000	0.00000000	0	0.0000000	0	0.0000000	0	0.0000000	0.00000000	0.866	0.0000866		
Fluoranthene	0	0.0000000	0	0.0000000	0	0.0000000	0.00000000	0	0.0000000	0	0.0000000	0	0.0000000	0.00000000	0.14	0.000014		
Fluorene	0.005	0.0000005	0.042	0.0000042	0.09	0.000009	0.00000059	0.003	0.0000003	0.057	0.0000057	0.01	0.000001	0.00000061	0.529	0.0000529		
Naphthalene	0.43	0.000043	0.44	0.000044	0.44	0.000044	0.00004367	0.0071	0.0000071	0.15	0.000015	0.22	0.000022	0.00001257	25.4	0.00254		
Phenanthrene	0.0047	0.0000047	0.043	0.0000043	0.12	0.000012	0.00000070	0.0038	0.0000038	0.083	0.0000083	0.021	0.0000021	0.00000110	0.77	0.000077		
Phenol	0.09	0.000009	0.0945	0.00000945	0.097	0.0000097	0.00000938	0	0.0000000	0	0.0000000	0.031	0.0000031	0.00000163	0	0.0000000		
Pyrene	0	0.0000000	0	0.0000000	0	0.0000000	0.00000000	0	0.0000000	0	0.0000000	0.006	0.0000006	0.00000026	0.21	0.000021		
Water	Balance	99.99940658	Balance	99.99914497	Balance	99.99944735	99.99933297	Balance	99.99994194	Balance	99.99985504	Balance	99.99983522	99.99987740	Balance	99.96612444		

Table 2 Downtime Internal Floating Roof Tank Emissions Calculations, Emissions Calculations
Shell Chemical Appalachia LLC, Monaca Cracker Plant

	FEOR A Tank Emissions					FEOR B Tank Emissions					Recovered Oil Tank Emissions					Total (3 Tanks)	
	Rim Seal Losses (lb/event)	Deck Fitting Losses (lb/event)	Deck Seam Losses (lb/event)	Withdrawal Losses (lb/event)	Total Losses (lb/event)	Rim Seal Losses (lb/event)	Deck Fitting Losses (lb/event)	Deck Seam Losses (lb/event)	Withdrawal Losses (lb/event)	Total Losses (lb/event)	Rim Seal Losses (lb/event)	Deck Fitting Losses (lb/event)	Deck Seam Losses (lb/event)	Withdrawal Losses (lb/event)	Total Losses (lb/event)	Total Losses (lb/event)	Total Losses (tons/event)
Total VOC	1.099E-04	3.978E-05	0.000E+00	2.849E-07	1.500E-04	6.129E-04	2.217E-04	0.000E+00	1.657E-08	8.346E-04	1.846E-02	1.181E-02	0.000E+00	2.542E-06	3.027E-02	0.03125	0.00002
Benzene	2.165E-05	7.829E-06	0.000E+00	5.997E-08	2.954E-05	2.322E-04	8.398E-05	0.000E+00	6.874E-09	3.162E-04	1.506E-03	9.635E-04	0.000E+00	1.816E-07	2.470E-03	0.00282	0.00000
Ethylbenzene	9.543E-06	3.451E-06	0.000E+00	1.859E-08	1.301E-05	1.431E-05	5.176E-06	0.000E+00	2.981E-10	1.949E-05	1.769E-03	1.132E-03	0.000E+00	2.400E-07	2.901E-03	0.00293	0.00000
Styrene	3.251E-06	1.176E-06	0.000E+00	2.092E-08	4.447E-06	8.305E-06	3.005E-06	0.000E+00	5.714E-10	1.131E-05	4.103E-04	2.625E-04	0.000E+00	1.441E-07	6.730E-04	0.00069	0.00000
Toluene	6.395E-05	2.313E-05	0.000E+00	1.332E-07	8.721E-05	3.347E-04	1.210E-04	0.000E+00	7.453E-09	4.557E-04	1.302E-02	8.336E-03	0.000E+00	1.358E-06	2.136E-02	0.02190	0.00001
Xylenes	3.957E-06	1.431E-06	0.000E+00	1.139E-08	5.400E-06	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	1.015E-03	6.495E-04	0.000E+00	1.914E-07	1.665E-03	0.00167	0.00000
1,2,4-Trimethylbenzene	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	2.677E-05	1.713E-05	0.000E+00	8.705E-09	4.390E-05	0.00004	0.00000
n-Propyl Benzene	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	5.695E-04	3.644E-04	0.000E+00	1.200E-07	9.340E-04	0.00093	0.00000
Butylbenzene	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	2.761E-05	1.766E-05	0.000E+00	1.388E-08	4.528E-05	0.00005	0.00000
2-Methylnaphthalene	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	1.188E-05	7.603E-06	0.000E+00	8.029E-08	1.956E-05	0.00002	0.00000
Acenaphthene	4.270E-07	1.544E-07	0.000E+00	1.302E-09	5.827E-07	4.957E-07	1.793E-07	0.000E+00	1.615E-11	6.749E-07	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.00000	0.00000
Acenaphthylene	1.279E-13	4.626E-14	0.000E+00	1.511E-09	1.511E-09	7.282E-14	2.634E-14	0.000E+00	9.189E-12	9.288E-12	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.00000	0.00000
Anthracene	5.574E-08	2.016E-08	0.000E+00	2.092E-10	7.611E-08	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	1.528E-09	9.773E-10	0.000E+00	6.496E-10	3.155E-09	0.00000	0.00000
Fluoranthene	4.249E-07	1.537E-07	0.000E+00	2.092E-10	5.788E-07	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	2.803E-10	1.793E-10	0.000E+00	1.050E-09	1.510E-09	0.00000	0.00000
Fluorene	6.077E-14	2.197E-14	0.000E+00	1.418E-09	1.418E-09	5.879E-14	2.126E-14	0.000E+00	1.466E-11	1.474E-11	4.068E-12	2.603E-12	0.000E+00	3.968E-09	3.975E-09	0.00000	0.00000
Naphthalene	6.579E-06	2.380E-06	0.000E+00	2.922E-08	8.988E-06	2.286E-05	8.267E-06	0.000E+00	1.085E-09	3.113E-05	9.474E-05	6.060E-05	0.000E+00	1.905E-07	1.555E-04	0.00020	0.00000
Phenanthrene	7.633E-08	2.761E-08	0.000E+00	2.557E-09	1.065E-07	4.857E-08	1.756E-08	0.000E+00	1.739E-11	6.616E-08	5.769E-09	3.692E-09	0.000E+00	5.776E-09	1.524E-08	0.00000	0.00000
Phenol	3.026E-10	1.094E-10	0.000E+00	3.789E-09	4.201E-09	1.742E-09	6.298E-10	0.000E+00	2.330E-10	2.605E-09	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.00000	0.00000
Pyrene	6.811E-08	2.463E-08	0.000E+00	6.043E-10	9.334E-08	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	7.247E-11	4.637E-11	0.000E+00	1.575E-09	1.694E-09	0.00000	0.00000
Total POM (minus Naphthalene)	1.052E-06	3.805E-07	0.000E+00	7.809E-09	1.440E-06	5.442E-07	1.968E-07	0.000E+00	5.739E-11	7.411E-07	1.189E-05	7.608E-06	0.000E+00	9.331E-08	1.959E-05	0.00002	0.00000
Total HAP	1.100E-04	3.977E-05	0.000E+00	2.849E-07	1.500E-04	6.129E-04	2.216E-04	0.000E+00	1.657E-08	8.346E-04	1.783E-02	1.141E-02	0.000E+00	2.399E-06	2.924E-02	0.03023	0.00002

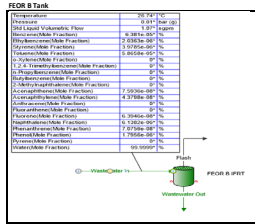
Table 3. Downtime Internal Floating Roof Tank Emissions Calculation, ProMax Input, FEORA Tank
Shell Chemical Adolphia LLC, Moraca Cracker Plant



Property	Value	Units
Process Stream	Wastewater In	
Tank Geometry	Internal Floating Roof Tank	
Shell Length	47.9	ft
Shell Diameter	55.4	ft
Number of Storage Tanks Employed	1	
Location	Pittsburgh, PA	
Time Frame	September	
Report Components	Non-exempt VOC	
Set Bulk Temperature to Stream Temperature?	<input type="checkbox"/>	
Use API-42 Raoult's Vapor Pressure?	<input type="checkbox"/>	
Maximum Fraction Fill of Tank	90	%
Average Fraction Fill of Tank	50	%
Minimum Fraction Fill of Tank	10	%
Material Category	Light Gaskets	
Insulation	Uninsulated	
Tank Color	White	
Tank Condition	Light Rust	
Shell Paint Condition	Average	
Operating Pressure	0	psig
Breaker Vent Pressure	0.03	psig
Breaker Vacuum Pressure	-0.03	psig
Roof Type	Dome	
Radius of Domed Roof	0.003	ft
Slope of Conical Roof		
Roof Color	White	
Roof Paint Condition	Average	
Flashing Temperature	71.4	°F
Maximum Average Temperature	73.9	°F
Minimum Average Temperature	54.9	°F
Average Absolute Pressure	14.7	psia
Daily Cycle Frequency	1.206	cycles/24hr
Average Wind Speed	6.3	mph
Underground Tanks?	<input type="checkbox"/>	
Slotted or Slotted Construction?	<input type="checkbox"/>	
Known Sum of Increases in Liquid Level?	<input type="checkbox"/>	
Sum of Increases in Liquid Level		ft/yr
Vapor Balanced Tank?	<input type="checkbox"/>	
Calculate Loading Losses?	<input type="checkbox"/>	
Output Flashing Losses?	<input checked="" type="checkbox"/>	
Output Working/Breathing Losses?	<input checked="" type="checkbox"/>	

Property	Value
Floating Roof Type	Pointoon
Tank Construction	Welded
Primary Seal	Mechanical Shoe
Secondary Seal Type #1	None
Secondary Seal Type #2	None
Seal Fitting Tightness	Tight
Self-Supported Roof?	<input checked="" type="checkbox"/>
Deck Construction	Sheet
Construction Type for Continuous Sheet Style Deck	0 feet wide
Construction Type for Panel Style Deck	8 x 7.5 feet
Number of Columns	0
Structural Column Material	Carbon
Construction Type of Internal Floating Roof Tank	Welded
Access Hatch Type	Bolted cover, gasketed
Access Hatch Quantity	1
Fixed roof support column well type	N/A
Fixed roof support column well quantity	0
Unslotted guide pole and well type	N/A
Unslotted guide pole and well quantity	0
Slotted guide pole/sample well type	Gasketed sliding cover, with pole sleeve
Slotted guide pole/sample well quantity	2
Gauge float well type	N/A
Gauge float well quantity	1
Gauge hatch/sample port type	Weighted mechanical actuation, gasketed
Gauge hatch/sample port quantity	1
Vacuum breaker type	Weighted mechanical actuation, gasketed
Vacuum breaker quantity	1
Deck drain type	N/A
Deck drain quantity	0
Slub drain quantity	0
Center Deck leg type	N/A
Center Deck leg quantity	10
Pointoon Deck leg type	N/A
Pointoon Deck leg quantity	0
Rim vent type	N/A
Rim vent quantity	0
Ladder well type	N/A
Ladder well quantity	0
Ladder-slotted guidepole combination well type	N/A
Ladder well quantity	0
Reset fittings to defaults	<input type="checkbox"/>

Table 4. Downtime Internal Floating Roof Tank Emissions Calculation, ProMax Input, FEOR 8 Tank
Shell Chemical Adolphia LLC, Moraca Cracker Plant



Property	Value	Units
Process Stream	Wastewater In	
Tank Geometry	Internal Floating Roof Tank	
Shell Length	47.9	ft
Shell Diameter	55.8	ft
Number of Storage Tanks Employed	1	
Location	Pittsburgh, PA	
Time Frame	September	
Report Components	Non-exempt VOC	
Set Bulk Temperature to Stream Temperature?	<input type="checkbox"/>	
Use AP42 Raoult's Vapor Pressure?	<input type="checkbox"/>	
Maximum Fraction Filled of Tank	50	%
Minimum Fraction Filled of Tank	10	%
Material Category	Light Organics	
Insulation	Uninsulated	
Tank Color	White	
Tank Condition	Light Rust	
Shell Paint Condition	Average	
Operating Pressure	0	psig
Breather Vent Pressure	0.03	psig
Breather Vacuum Pressure	-0.03	psig
Roof Type	Dome	
Radius of Domed Roof	0.0625	ft
Slope of Conical Roof		
Roof Color	White	
Roof Paint Condition	Average	
Flashing Temperature	71.4	°F
Maximum Average Temperature	73.9	°F
Minimum Average Temperature	54.8	°F
Average Absolute Pressure	14.1	psia
Daily Solar Insolation	1,306	Btu/ft ² /day
Average Wind Speed	6.3	mi/h
Underground Tank?	<input type="checkbox"/>	
Isolated or Divided Construction?	<input type="checkbox"/>	
Known Sum of Increases in Liquid Level?	<input type="checkbox"/>	
Sum of Increases in Liquid Level		ft/yr
Vapor Balanced Tank?	<input type="checkbox"/>	
Calculate Loading Losses?	<input type="checkbox"/>	
Output Loading Losses?	<input type="checkbox"/>	
Output Flashing Losses?	<input checked="" type="checkbox"/>	
Output Working/Breathing Losses?	<input checked="" type="checkbox"/>	

Property	Value
Flashing Roof Type	Push-on
Tank Construction	Welded
Primary Seal	Mechanical Shoe
Secondary Seal Type #1	None
Secondary Seal Type #2	None
Seal Fitting Tightness	Tight
Self-Supported Roof?	<input checked="" type="checkbox"/>
Deck Construction	Sheet
Construction Type for Continuous Sheet Style Deck	5 Feet wide
Construction Type for Panel Style Deck	5 x 7.5 Feet
Number of Columns	0
Effective Column Diameter	Default
Construction Type of Internal Floating Roof Tank	Welded
Access Hatch type	Bolted cover, gasketed
Access Hatch quantity	1
Fixed roof support column well type	N/A
Fixed roof support column well quantity	0
Unslotted guide pole and well type	N/A
Unslotted guide pole and well quantity	0
Slotted guide pole/sample well type	Gasketed sliding cover, with pole sleeve
Slotted guide pole/sample well quantity	2
Gauge-Root well type	N/A
Gauge-Root well quantity	1
Gauge-hatch/sample port type	Weighted mechanical actuation, gasketed
Gauge-hatch/sample port quantity	1
Vacuum breaker type	Weighted mechanical actuation, gasketed
Vacuum breaker quantity	1
Deck drain type	N/A
Deck drain quantity	0
Sub drain quantity	0
Center Deck leg type	N/A
Center Deck leg quantity	10
Perimeter Deck leg type	N/A
Perimeter Deck leg quantity	0
Rim vent type	N/A
Rim vent quantity	0
Ladder well type	N/A
Ladder well quantity	0
Ladder-slotted guidepole combination well type	N/A
Ladder well quantity	0
Reset fittings to defaults	<input type="checkbox"/>

