



November 14, 2023

Pilots Only Operation
Shell Chemical Appalachia LLC
Center Township, Beaver County

Dear Ms. Kaal

Shell has asked the Department about how to treat circumstances when the ethane cracking furnaces are heated only by pilots and there is no hydrocarbon feed (“Pilots Only Operation”) for purposes of continuous emission monitor (CEM) emission coding. The Department has reviewed the plan approval authorization for the facility (PA-04-00740C). Pilots Only Operation is already covered by the Plan Approval.

Per Section E, Group G01, Condition 008, Pilots Only operation meets the existing definitions of both Startup and Shutdown because the furnace coil operating temperature is below the stable operating temperature of 750 degrees C. There is not hydrocarbon feed being introduced to the ethane cracking furnaces during Pilots Only Operation so it does not meet the definition of Normal Operation.

As such, the emission limitations applicable to Pilots Only Operation are:

Per Section E, Group G01, Condition 004, CO emissions from the ethane cracking furnaces shall not exceed the following:

- 52.2 lb/hr from each furnace during periods of startup, shutdown, and decoking, and
- 670.4 tons from all furnaces combined in any consecutive 12-month period.

Per Section E, Group G01, Condition 007, NOx emissions from the ethane cracking furnaces shall not exceed the following:

- 31.1 lb/hr from each furnace during periods of startup or shutdown, and
- 181.3 tons from all furnaces combined in any consecutive 12-month period.

Please contact me if you wish to discuss further.

Sincerely,

Mark R. Gorog, P.E./MRG
Environmental Program Manager
Air Quality Program

CC: Case File
BAQ: Permitting

Operations: B. Speicher/K. Goddard
SW BAQ: S. Hepler CEMs: C. Zadakis

NSR: S. Guerrieri
ARD: K. Halloran

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