27	00-FM-AQ0023 Rev. 1/2008 pennsylvania DEPARTMENT OF ENVIRONMENTAL PROTECTION		INSPECTION REPORT				Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program			
	te(s) of Inspection:]	Permit #(s): PA-04-00740A, B, C	Expiration Date:		Case 04		75836		
	mpany Name: nell Chemical Appalachia LLC		Municipality: Potter Township				aver			
SH	nt Name: IELL CHEM APPALACHIA ETROCHEMICALS COMPLEX		Physical Location: Route 18				eral ID — Plant Code #: -1624986-1			
	sponsible Official: illiam Watson			Mailing A	ddress: rankfort Roa	ad				
	eneral Manager			Mona	ca, PA 1506	1-2	210			
	one #(s): 24-709-2825									
M	ark (X) All Inspection Types Th	nat	Apply To This Ins	spectio	n:					
	Full Compliance Evaluation (FCE)		Plan Approval Inspection	on			File Review (FR)			
	Operating Permit Inspection (PI)		Initial Permit Inspection	n (IPI)			Complaint Inspection	(CI)		
\boxtimes	Routine/Partial (RTPT)		Follow-Up Inspection (Ref. Date:)		Sample Collection (S	C)		
	Minor Source(s) Inspection (RFD)		Stack Test Observation	n			Multi-Media Inspection	on (MM)		
	Other:		Announced							
An	nual Compliance Certification Received:	ΥE	S 🗌 NO 🖾 N/A		Date Received	:				
All	MS Report Received:	ΥE	S NO N/A		Date Received	:				
M	ark (X) All Activities That Appl	y:								
	File Review		Pre-Inspection Briefing	!			Exit Interview/Briefing	9		
	Pre-Inspection Observations		Check For New/Unrepo	orted Soul	ces		Sample(s) Collected			
	Visible Emissions Observations		Verify Operation of CE	MS			Other			
I in the cle	mpliance Status: In Oc. C: 2821 NAICS Inspected Beaver, Vanport and Ir Inspected the Shell Chemicals factor of the Shell C	S: 2 ndu cility erve	stry early this after y today from 1:20 F e any visible, fugitiv	rnoon a PM to 3 ve or m	nd did not ol :20 PM. I w alodor emiss	bse as I sion	ocated across th s today. The we	s. e Ohio River at ather was		
	mpany Representative:	Title	e: 		Signature:			Date:		
	P Representative:	Title	e: · Quality Specialist	Signature: Scott Beaudway/SB			Date/Time: 9/5/23			
Thi	e document is official notification that a representat		f the Department of Engireer		action Air Ouglity F) = a = a	na inamantad tha idantifias	site. The findings of this		

This document is official notification that a representative of the Department of Environmental Protection, Air Quality Program, inspected the identified site. The findings of this inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.

Date: 9/5/23 Reviewed By Krustin Hulland Page $\underline{1}$ of $\underline{2}$ eFacts Inspection ID#: 3610098

Shell Chemical Appalachia LLC, 04-00740

I contacted Shell Chemicals to inform them of my observations and to request the list of operating sources and control devices. Shell Chemicals provided a list of sources and control devices in operation at the time of my observations. Shell Chemicals also submitted records (attached) of an analysis of the gas composition for the material being routed to the flare.

Sources reported to be in operation during my site observation:

9/5/2023 1:20 PM to 3:20 PM Source and Controls Status

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031 Ethane Cracking Furnace 1 - Operating (Hot Steam Standby)
032 Ethane Cracking Furnace 2 – Operating (Normal/Cracking)
033 Ethane Cracking Furnace 3 – Operating (Normal/Cracking)
034 Ethane Cracking Furnace 4 - Operating (Normal/Cracking)
035 Ethane Cracking Furnace 5 – Not Operating (Pilots Only)
036 Ethane Cracking Furnace 6 - Not Operating (No Pilots)
037 Ethane Cracking Furnace 7 - Operating (Normal/Cracking)
101 Cogen 1 CT+ DB - Operating
102 Cogen 2 CT+ DB - Operating
103 Cogen 3 CT+ DB - Operating
104 Cogeneration Plant Cooling Tower - Operating
105 Diesel-Fired Emergency Generator Engines - Standby
106 Fire Pump Engines - Standby
107 Natural Gas Fired Emergency Generator Engines - Standby
201 Ethylene Manufacturing Line - Operating
202 Polyethylene Manufacturing Lines – PE1 operating, PE2 down, PE3 down
203 Process Cooling Tower - Operating
204 Low Pressure (LP) Header System - Operating LP Incinerator and Multipoint Ground Flare (MPGF)
205 High Pressure (HP) Header System - Operating HP Ground Flare A and B, HP Elevated Flare on Standby
206 Spent Caustic Vent Header System - Operating Spent Caustic Vent Incinerator
301 Polyethylene Pellet Material Storage/Handling/Loadout -Operating
302 Liquid Loadout (Recovered Oil) - Not Operating
303 Liquid Loadout (Pyrolysis Fuel Oil, Light Gasoline) - Not Operating
304 Liquid Loadout (C3+, Butene, Isopentane, Isobutane, C3+ Ref) – Not Operating
305 Liquid Loadout (Coke Residue/Tar) - Not Operating
401 Storage Tanks (Recovered Oil, Equalization Wastewater) - Operating
402 Storage Tank (Spent Caustic) - Operating
403 Storage Tanks (Light Gasoline) - Operating
404 Storage Tanks (Hexene) - Operating
405 Storage Tanks (Misc Pressurized/Refrigerated) - Operating
406 Storage Tanks (Diesel Fuel > 150 Gallons) - Operating
407 Storage Tanks (Pyrolysis Fuel Oil) - Operating
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501 Equipment Components - Operating

502 Wastewater Treatment Plant - Operating

408 Storage Tanks (Diesel Fuel < 150 Gallons) - Operating

409 Methanol Storage Vessels and Associated Components -Operating

503 Plant Roadways - In Use

All Listed Controls Operating

PADEP Policy Information

DEP is now accepting permit and authorization applications, as well as other documents and correspondence, electronically through the OnBase Electronic Forms Upload tool. Please use the link below to view the webpage, get instructions, and submit documents:

https://www.dep.pa.gov/DataandTools/Pages/Application-Form-Upload.aspx

Effective January 16, 2021, all air quality applications, Permits, Requests for Determinations and initial Asbestos Notifications will be subject to new and/or increased fees. The new fees and other PADEP Air Quality information can be found at: https://www.dep.pa.gov/Business/Air/Pages/default.aspx

As of July 29, 2021, the Source Testing Section has gone paperless. An individual Source Testing Section reviewer may request a hard copy from the facility or the consultant. Note that the section will continue to require electronic submissions of protocols and reports to the resource email account (<u>raepstacktesting@pa.gov</u> or by disk and snail mail when the file is over 35 MBs). Periodic Monitoring reports (generally three 20-minute test runs) shall only be submitted to the regional office.

As of November 10, 2021, there have been some changes to how the regional offices will accept electronic submission. OnBase submissions of protocols and reports will no longer be accepted for Source Testing.

SWRO: Any email submission to <u>ra-epstacktesting@pa.gov</u> should also be CC-ed to <u>ra-epswstacktesting@pa.gov</u>. Beyond that email cc, no further submission is necessary to DEP SWRO (i.e. no hard copy or disk needed for SWRO).

Shell Polymers HP Flare System GC Hourly Average Compositions*

	Elemental											
	Hydrogen	Nitrogen	Methane	Ethane	Acetylene	Ethylene	C3	C4	C4 Olefins	C5	C6+	Total
Date and Time	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol
05-Sep-23 13:00:00	25.13	24.84	42.12	3.58	0.00	3.47	0.49	0.05	0.32	0.00	0.00	100
05-Sep-23 14:00:00	26.07	22.64	43.82	3.57	0.00	3.69	0.15	0.04	0.02	0.00	0.00	100
05-Sep-23 15:00:00	26.16	22.00	44.08	3.62	0.00	3.83	0.23	0.04	0.04	0.00	0.01	100

Shell Polymers LP System Thermal Oxidizer GC Hourly Average Compositions*

	Elemental											
	Hydrogen	Nitrogen	Methane	Ethane	Acetylene	Ethylene	C3	C4	C4 Olefins	C5	C6+	Total
Date and Time	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol
05-Sep-23 13:00:00	0.31	78.71	17.56	1.24	0.00	1.41	0.05	0.03	0.11	0.47	0.12	100
05-Sep-23 14:00:00	0.33	79.93	16.42	1.10	0.00	1.46	0.04	0.02	0.10	0.50	0.12	100
05-Sep-23 15:00:00	0.30	79.19	17.24	1.16	0.00	1.36	0.05	0.02	0.11	0.47	0.11	100

Shell Polymers LP System Multipoint Ground Flare PE1/2 Episodic Vent Header*

	Elemental											
	Hydrogen	Nitrogen	Methane	Ethane	Acetylene	Ethylene	C3	C4	C4 Olefins	C5	C6+	Total
Date and Time	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol
05-Sep-23 13:00:00	0.04	6.64	86.54	6.47	0.00	0.00	0.25	0.05	0.00	0.01	0.00	100
05-Sep-23 14:00:00	0.04	6.63	86.89	6.14	0.00	0.00	0.24	0.05	0.00	0.00	0.00	100
05-Sep-23 15:00:00	0.04	6.64	86.88	6.14	0.00	0.00	0.24	0.05	0.00	0.00	0.00	100

^{*} All data still subject to final QC for purposes of emissions inventory calculations and submittals