



Shell Chemical Appalachia LLC
300 Frankfort Rd
Monaca, PA 15061

October 28, 2025

Bradley Spayd
Air Quality Engineering Specialist
Pennsylvania Department of Environmental Protection
Bureau of Air Quality - Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222-4745

**Re: Shell Chemical Appalachia LLC
Shell Polymers Monaca Site
Potter and Center Townships, Beaver County
Title V Operating Permit Application No. TV 04-00740, Authorization No. 1489795
Technical Deficiency Letter – Extension Request**

Dear Mr. Spayd:

In June 2024, Shell Chemical Appalachia LLC (“Shell”) submitted an initial Title V operating permit application (Title V Operating Permit Application No. TV 04-00740, Authorization No. 1489795) to the Pennsylvania Department of Environmental Protection (DEP) for Shell Polymers Monaca (“SPM”), an ethylene and polyethylene production facility in Monaca, Beaver County, Pennsylvania. On May 27, 2025, Shell received a technical deficiency letter from DEP in response to this June 2024 Title V operating permit application. In the referenced technical deficiency letter, DEP requested that Shell update the June 2024 Title V operating permit application within 90 days of receipt of the letter (i.e., by August 25, 2025) to reflect changes at SPM that are currently being reviewed by DEP under a pending plan approval application that Shell submitted to DEP on September 13, 2024. On August 7, 2025, Shell submitted an extension request to DEP to allow for an additional 90 days to provide the updated Title V operating permit application to DEP (revised application submittal required by November 23, 2025). The extension request was granted by DEP on August 21, 2025.¹

The referenced plan approval application for PA-04-00740D includes proposed physical modifications at SPM and plan approval reconciliations, which are expected to result in new and changed plan approval source descriptions, terms, and conditions. However, based on recent discussions and ongoing technical review requests and submittals between Shell and DEP, Shell’s current understanding is that PA-04-00740D is still completing technical review, and Shell does not anticipate receiving a proposed plan approval from DEP with sufficient time before November 23, 2025, to adequately revise the Title V

¹ Letter from Bradley Spayd (DEP Air Quality Engineering Specialist) to Laura Sabolyk (SPM Sr. Regulatory Advisor) and Kimberly Kaal (SPM Environmental Manager) dated August 21, 2025.

operating permit application. As a result, Shell will not have all the revised plan approval information to include in a revised Title V operating permit application by November 23, 2025, pursuant to 25 Pa. Code § 127.503. Therefore, in order to avoid the need to submit multiple revisions to the initial Title V operating permit application, Shell requests an additional 60 days to provide the updated Title V operating permit application to DEP (i.e., revised application submittal by January 22, 2026).

If you have any questions regarding this extension request, please contact me at (724) 709-2906 or Laura.L.Sabolyk@Shell.com.

Sincerely,

A handwritten signature in black ink that reads "Laura Sabolyk". The script is cursive and fluid, with the first name "Laura" and last name "Sabolyk" clearly distinguishable.

Laura Sabolyk
Sr. Regulatory Advisor

CC: Mark Gorog, DEP Air Quality Program Manager
Eric Gustafson, DEP Southwest Regional Director
Tom Joseph, DEP Environmental Group Manager (Permits)
Kevin Halloran, DEP Assistant Regional Director
Emily Green, DEP Environmental Community Relations Specialist
Kim Kaal, SPM Environmental Manager
Michael Carbon, Landau Associates Senior Principal