



December 4, 2023

NOTICE OF VIOLATION

VIA EMAIL: Kimberly.Kaal@shell.com

Kimberly Kaal, Environmental Manager
Shell Chemical Appalachia LLC
300 Frankfort Road
Monaca, PA 15061

Re: PA-04-00740C
Visible Emissions
Shell Petrochemicals Complex
Potter Township
Beaver County

Dear Kimberly Kaal:

The Shell Chemical Appalachia LLC (“Shell”) Petrochemicals Complex is authorized to operate pursuant to plan approvals PA-04-00740A, PA-04-00740B, and PA-04-00740C. Shell reported to the Department that visible emissions were observed from several sources on several dates since May of 2023. Please see Table 1 below. The Department has identified the following violations from these events:

1. PA-04-00740C, Section D, Source 204, Condition #001, states visible emissions from both the LP Incinerator and MPGF shall not exceed 0% opacity except for a total of five minutes during any consecutive two-hour period. By permitting visible emissions greater than 0% opacity from the either the LP Incinerator or the MPGF (Sources C204A and C204B) in excess of five minutes, Shell caused violations of PA-04-00740C and 25 Pa. Code § 127.25.
2. PA-04-00740C, Section D, Source 205, Condition #001, states visible emissions from both the HP ground flares and emergency elevated flare shall not exceed 0% opacity except for a total of five minutes during any consecutive two-hour period. By permitting visible emissions greater than 0% opacity from the both the HP ground flare and the emergency elevated flare (Sources C205A and C205C) in excess of five minutes, Shell caused violations of PA-04-00740C and 25 Pa. Code § 127.25.

3. 40 CFR § 60.18 (b)(1), states flares shall be designed for and operated with no visible emissions as determined by the methods specified in paragraph (f), except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. By permitting these visible emissions from the flares (Sources C205A, C205C and C204B), Shell caused a violation of 40 CFR § 60.18.

Table 1: Shell Chemical Malfunctions

Malfunction Date	Malfunction Report Date	Source Involved	Visible Emission Duration
5/24/2023	6/22/2023	C205A	4 hours 53 minutes and 20 seconds
7/10/2023	8/10/2023	C204B	6 minutes and 3 seconds
7/10/2023	8/9/2023	C205C	11 minutes and 4 seconds
8/3/2023	8/29/2023	C204B	5 minutes and 57 seconds
9/2-3/2023	9/28/2023	C204B	14 minutes and 12 seconds
10/11/2023	11/10/2023	C204B	8 minutes and 13 seconds

The above violation(s) constitute unlawful conduct and a public nuisance as defined by Sections 8 and 13 of the Air Pollution Control Act (APCA), 35 P.S. Sections 4008 and 4013, respectively. Persons violating DEP's Air Quality Regulations are subject to the penalties of Sections 9 and 9.1 of the APCA. Each day the violation continues constitutes a separate offense.

This Notice of Violation is neither an order nor any other final action of DEP. It neither imposes nor waives any enforcement action available to DEP under any of its statutes. If DEP determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions concerning this matter, please contact me at sbeaudway@pa.gov or at 412-417-7952.

Sincerely,

Scott Beaudway/SB

Scott Beaudway
Air Quality Specialist
Air Quality

cc: E. Speicher, Environmental Group Manager
K. Goddard, District Supervisor
Central Office (via email)
04-00740 Enforcement File