27	700-FM-AQ0023 Rev			INSPECTION REPORT				epartment of Envir	of Pennsylvania conmental Protection y Program		
	nte(s) of Inspection:	TV PA SM GP MEGA]	Permit #(s): PA-04-00740A, B, C	Expiratio	n Date:	Case 04 -	**: 00740	PF ID #: 775836		
	mpany Name: hell Chemical A	ppalachia LLC		Municipality: Potter Township				County: Beaver			
SI /P	ant Name: HELL CHEM APPAI ETROCHEMICALS			Physical Location: Route 18				ral ID — Plant Code # 1624986-1	# :		
	esponsible Official: /illiam Watson				Mailing A	ddress: ankfort Ro	ad				
	_{ie:} eneral Manager	•			Mona	ca, PA 1506	31-2	210			
	one #(s): 24-709-2825										
M	lark (X) All Insp	ection Types Th	at	Apply To This In	spectio	n:					
	Full Compliance Eva	luation (FCE)		Plan Approval Inspection	on			File Review (FR)			
	Operating Permit Ins	pection (PI)		Initial Permit Inspection	ı (IPI)		\boxtimes	Complaint Inspect	ion (CI)		
X	Routine/Partial (RTP	T)		Follow-Up Inspection (I	Ref. Date:)		Sample Collection (SC)			
	Minor Source(s) Insp	ection (RFD)		Stack Test Observation				Multi-Media Inspection (MM)			
	Other:			Announced							
Ar	nnual Compliance Certi	ification Received:	YES	S □ NO ⊠ N/A		Date Received	l:				
ΑI	MS Report Received:		YES	S NO N/A		Date Received	l:				
M	lark (X) All Activ	ities That Appl	y:								
	File Review			Pre-Inspection Briefing				Exit Interview/Briefing			
	Pre-Inspection Obse	rvations		Check For New/Unreported Sources				Sample(s) Collected			
	Visible Emissions Ob			Verify Operation of CE				Other			
S	ompliance Status: IC: 2821	NAICS		21112	-	·		s a Follow-Up Insp			
I d	observed the Sho hemicals facility.	ell Chemicals fac I did not observ	ility e a	and Potter Towns today from 9:15 A ny visible, fugitive owers. The weat	AM to 1 or mal	1:15 AM. I v odor emissio	was ons	located at Gat today. I obser	te #3 of the Shell ved only steam		
			och	nester late this mo	rning ar		oser	ve any malodo	ors.		
	ompany Representative IEMO TO FILE	e:	Title	itle: Signatu					Date:		
	EP Representative:		Title	tle: Signature:					Date/Time:		
S	cott Beaudway		Air	Quality Specialist		Scott Beau	dwa	y/SB	11/8/23		
Th	is document is official noti	fication that a representat	ive of	the Department of Environr	nental Prote	ection, Air Quality F	rogra	m, inspected the ident	ified 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. Kristin Lodlard

Date: 11/8/23 Reviewed By Page <u>1</u> of <u>3</u> eFacts Inspection ID#: 3642146

Shell Chemical Appalachia LLC, 04-00740

501 Equipment Components - Operating 502 Wastewater Treatment Plant - Operating

Shell Chemical Appalachia LLC, 04-00740

503 Plant Roadways - In Use

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:

Note that the plant (all of ECU and all of PE) was down during the inspection windows and remains down. 11/8/23 9:15 AM to 11:15 AM Source and Controls Status

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031 Ethane Cracking Furnace 1 –Not Operating (Pilot)
032 Ethane Cracking Furnace 2 –Not Operating (Pilot)
033 Ethane Cracking Furnace 3 –Not Operating(No Pilots)
034 Ethane Cracking Furnace 4 -Not Operating (Pilot)
035 Ethane Cracking Furnace 5 – Not Operating (Pilot)
036 Ethane Cracking Furnace 6 –Not Operating (Pilot)
037 Ethane Cracking Furnace 7 –Not Operating (Pilot)
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 - Not Operating
202 Polyethylene Manufacturing Lines – PE1 Not Operating, PE2 Not Operating, PE3 Not Operating
203 Process Cooling Tower - Operating
204 Low Pressure (LP) Header System - Operating Multipoint Ground Flare; LP Incinerator out of service for
maintenance, all vent gas routed to the 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 – Not 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
408 Storage Tanks (Diesel Fuel < 150 Gallons) - Operating
409 Methanol Storage Vessels and Associated Components -Operating
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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
08-Nov-23 09:00:00	0.05	13.37	78.92	4.54	0.00	2.90	0.17	0.05	0.00	0.00	0.01	100.00
08-Nov-23 10:00:00	0.04	15.95	77.01	4.35	0.00	2.42	0.15	0.05	0.00	0.00	0.02	100.00
08-Nov-23 11:00:00	0.04	17.26	76.88	4.21	0.00	1.40	0.14	0.04	0.00	0.00	0.02	100.00

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
08-Nov-23 09:00:00	0.03	12.46	82.82	4.47	0.00	0.00	0.16	0.04	0.00	0.01	0.02	100.00
08-Nov-23 10:00:00	0.03	14.24	81.25	4.26	0.00	0.00	0.14	0.03	0.00	0.01	0.05	100.00
08-Nov-23 11:00:00	0.03	13.53	81.82	4.40	0.00	0.00	0.14	0.03	0.00	0.01	0.04	100.00

Thermal oxidizer out of service--> all vent gas routed to the Multipoint Ground Flare

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
08-Nov-23 09:00:00	0.03	22.69	73.20	3.91	0.00	0.00	0.14	0.03	0.00	0.00	0.00	100.00
08-Nov-23 10:00:00	0.03	22.84	73.18	3.79	0.00	0.00	0.13	0.03	0.00	0.00	0.00	100.00
08-Nov-23 11:00:00	0.03	22.91	73.02	3.88	0.00	0.00	0.12	0.03	0.00	0.00	0.00	100.00

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