



December 14, 2022

SUBMISSION OF EMISSION EXCEEDANCE REPORT AND MITIGATION PLAN

VIA EMAIL: Kimberly.Kaal@shell.com

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

Re: PA-04-00740C
Shell Petrochemicals Facility
12-month Rolling Emissions Exceedances and Increased Emissions
Potter Township
Beaver County

Dear Kimberly Kaal,

On November 7, 2022, Shell Chemical Appalachia LLC (“Shell”) provided emissions data, including 12-month rolling emission totals for the Shell Petrochemicals Complex. A review of this emissions data identified violations of 25 Pa. Code § 127.25 and the requirements of PA-04-00740C, Section C, Condition No. 005. Specifically, Shell exceeded the 12-month rolling emission totals for VOC in September and October 2022. A Notice of Violation was sent to your attention on December 13, 2022. The emission data also showed increases in emissions of other air contaminants, including carbon monoxide, oxides of nitrogen, and hazardous air pollutants. Shell has represented to the Department that these emission increases are attributable to events occurring during the Commissioning process of the Monaca, Pennsylvania Shell Petrochemical facility.

Per the requirements of PA-04-00740C, Section D, Source ID 204, Condition No. 018, and PA-04-00740C, Section D, Source ID 205, Condition No. 011, Shell is already required to “conduct a root cause analysis within 45 days after any startup flaring event, shutdown flaring event, or unforeseen flaring event” as defined in the conditions. Additionally, per PA-04-00740C, Section D, Source ID 205, Condition No. 010, Shell is already required to “minimize flaring resulting from startups, shutdowns, and unforeseeable events by operating at all times in accordance with an approved flare minimization plan” as detailed in the condition.

The Department requests that within **forty-five (45) days** of your receipt of this letter, Shell submit a technical report (“Emission Exceedance Report and Mitigation Plan”) to the Department, which evaluates the Commissioning process for the Facility; the required “root cause analyses” as defined, and confirmation that the Source ID 205 flare has been operated in

accordance with the approved "flare minimization plan." In addition, the Emission Exceedance Report and Mitigation Plan should identify the causes of the excess emissions, sources where the excess emissions occurred, projections of emission exceedances that are anticipated to occur in the future, measures that were employed and measures that could have been employed to have reduced or prevented excess emissions, and a description of and schedule for implementing additional emission mitigating measures. Please include any data, calculations, and references relied upon to prepare the Emission Exceedance Report and Mitigation Plan. The Emission Exceedance Report and Mitigation Plan should encompass the requirements of Section D, Source ID 204, Condition No. 018 and PA-04-00740C, Section D, Source ID 205, Condition No. 010 and No. 011 and expand on them as described in this paragraph. Please submit the report to Anna Hensel, District Supervisor, Department of Environmental Protection, Air Quality Program, at ahensel@pa.gov.

The Department also requests that within **fifteen (15) days** of receipt of this letter, Shell inform the Department if it will provide the Emission Exceedance Report and Mitigation Plan as requested above. Please provide the notification to Anna Hensel, District Supervisor, at Department of Environmental Protection, Air Quality Program, ahensel@pa.gov.

This request for Emission Exceedance Report and Mitigation Plan is neither an order nor any other final action of the Department of Environmental Protection. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that enforcement action is appropriate, you will be notified of such action.

If you have any questions regarding this request for the Emission Exceedance Report and Mitigation Plan you may contact me at 412-442-4150.

Sincerely,



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

cc: Operations – E. Speicher
District Supervisor – A. Hensel
Compliance – K. Goddard
SW OCC – M. Heilman
SW ARD – K. Halloran
Central Office (via email)
Enforcement File: 04-00740