



Shell Chemical Appalachia LLC
300 Frankfort Rd
Monaca, PA 15061

January 19, 2026

Director
Air Protection Section
Mail Code 3ED21
Environmental Protection Agency, Region 3
Four Penn Center
1600 JFK Boulevard
Philadelphia, PA 19103-2029

Mark Gorog P.E., Regional Manager Air Quality Program
Pennsylvania Department of Environmental Protection
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222

**RE: Shell Chemical Appalachia LLC
Shell Polymers Monaca Site
Potter and Center Townships, Beaver County, PA
National Emission Standard for Benzene Waste Operations
40 CFR Part 61 Subpart FF Quarterly Inspection Report
Reporting Period: October 1, 2025 through December 31, 2025**

Dear Administrator:

Shell Chemical Appalachia LLC (Shell) is submitting this *Quarterly Inspection Report* as required by 40 CFR Part 61 Subpart FF, *National Emission Standard for Benzene Waste Operations* (BWON), for the Shell Polymers Monaca (SPM) Site located in Beaver County, Pennsylvania. SPM is subject to requirements of the BWON Rule through applicability to 40 CFR Part 63 Subpart YY, *National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic Maximum Achievable Control Technology Standards*, which requires that processes that generate waste containing benzene follow the waste requirements of 40 CFR Part 63 Subpart XX, *National Emission Standards for Ethylene Manufacturing Process Units: Heat Exchange Systems and Waste Operations*. Subparts YY and XX are commonly referred to as the Ethylene MACT (EMACT) Rule.

The reporting period for this report is October 1, 2025 through December 31, 2025. The data required in the report are outlined below.

1. **§61.357(d)(6)**: A certification that the required inspections have been carried out in accordance with the requirements of this subpart must be included in the report.

Shell Response: The required inspections of BWON applicable units/equipment were conducted as required. Records of the inspections are maintained at the site, and this report's signature represents the required certification.

2. **§61.357(d)(7)(i):** If a treatment process or wastewater treatment system unit is monitored in accordance with §61.354(a)(1) of this subpart, then each period of operation during which the concentration of benzene in the monitored waste stream exiting the unit is equal to or greater than 10 parts per million by weight (ppmw) must be reported.

Shell Response: Not applicable. SPM complies with the “6BQ” compliance option detailed in §61.342(e). The treatment process standards detailed in §61.348 do not apply to facilities complying with the “6BQ” compliance option for aqueous wastes.

3. **§61.357(d)(7)(ii):** If a treatment process or wastewater treatment system unit is monitored in accordance with §61.354(a)(2) of this subpart, then each 3-hour period of operation during which the average value of the monitored parameter is outside the range of acceptable values or during which the unit is not operating as designed must be reported.

Shell Response: Not applicable. The treatment process standards detailed in §61.348 do not apply to facilities complying with “6BQ” compliance option for aqueous wastes.

4. **§61.357(d)(7)(iii):** If a treatment process or wastewater treatment system unit is monitored in accordance with §61.354(b), then each period of operation during which the flow-weighted annual average concentration of benzene in the monitored waste stream entering the unit is equal to or greater than 10 ppmw and/or the total annual benzene quantity is equal to or greater than 1.0 Megagram per year (Mg/yr) must be reported.

Shell Response: Not applicable. The treatment process standards detailed in §61.348 do not apply to facilities complying with “6BQ” compliance option for aqueous wastes.

5. **§61.357(d)(7)(iv):** For a control device monitored in accordance with §61.354(c), each period of operation monitored during which any of the applicable conditions occur, as applicable to the control device, must be reported.

Shell Response: Shell operates the Spent Caustic Thermal Oxidizer (SCTO) [Source ID 206], which controls emissions from various BWON applicable units/equipment. Therefore, in accordance with §61.357(d)(7)(iv)(A), Shell must provide each 3-hour period of operation during which the average temperature of the gas stream in the combustion zone of a thermal vapor incinerator, as measured by the temperature monitoring device, is more than 28°C (50°F) below the design combustion zone temperature.

There were no 3-hour periods of operation when the SCTO combustion temperature was outside the design and performance-tested temperature range associated with the requirement in §61.349(a)(2)(i)(A) for 95% destruction efficiency when treating emissions regulated by 40 CFR Part 61 Subpart FF during this reporting period.

There were no periods of uncontrolled emissions that are regulated under 40 CFR Part 61 Subpart FF during this reporting period.

6. **§61.357(d)(7)(v):** For a cover and closed-vent system monitored in accordance with §61.354(g), the owner or operator must submit a report quarterly to the Administrator that identifies any period in which the pressure in the waste management unit is equal to or greater than atmospheric pressure.

Shell Response: Not applicable. Shell does not own or operate any waste management units which use a cover and closed-vent system for control systems for emission control maintained at a pressure less than atmospheric pressure as described in §61.354(g).

Should you have any questions concerning this report, please contact Laura Sabolyk at Laura.L.Sabolyk@shell.com or Aaron Signarovitz at Aaron.Signarovitz@shell.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Padilla', written in a cursive style.

Martin Padilla
HSSE Manager

CC: S. Guerrieri