



Shell Chemical Appalachia LLC
300 Frankfort Road
Monaca, Pennsylvania 15061

January 20, 2026

Clarissa Poole
U.S. Environmental Protection Agency, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Shell Chemicals Appalachia LLC
Shell Polymers Monaca
Potter and Center Township, Beaver County
PA-04-00740A & PA-04-00740C
Audit Policy Disclosure - 40 CFR Subparts Kb, NNN, and RRR

Dear Ms. Poole,

Enclosed are voluntary disclosures being made in accordance with U.S. EPA's Audit Policy. Affected facilities and regulations are as follows:

Affected Subparts

- 40 CFR Part 60 Subpart Kb (Volatile Organic Liquid Storage Vessels)
- 40 CFR Part 60 Subpart NNN (SOCMI Distillation Operations)
- 40 CFR Part 60 Subpart RRR (SOCMI Reactor Processes)

This disclosure is being made through U.S. EPA's Central Data Exchange (CDX) system. Date of discovery for this disclosure is December 30, 2025. Please see each enclosure for additional details.

In accordance with the Audit Policy, violations will be corrected within 60 days of the date of discovery and updated Compliance Certification will be submitted within 60 days of the date of this disclosure.

Please contact me at laura.l.sabolyk@shell.com or Alan Binder at alan.binder@shell.com if you have any questions or need additional information.

Sincerely,

Laura Sabolyk

Laura Sabolyk
Senior Regulatory Advisor

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

Enclosures:

Attachment 1 – Hexene Tanks 40 CFR Part 60 Subpart Kb
Attachment 2 – Distillation Operations 40 CFR Part 60 Subpart NNN
Attachment 3 – Reactor Processes 40 CFR Part 60 Subpart RRR

Attachment 1

40 CFR Part 60 Subpart Kb Applicability Determination to Hexene Storage Tanks Update Summary

Rule:

40 CFR Part 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, and On or Before October 4, 2023

Affected Volatile Organic Liquid Storage Vessels:

- Hexene Storage Tank (T-64302A)
- Hexene Storage Tank (T-64302B)

Determination Prior to January 19, 2026:

Hexene storage tanks at Shell Polymers Monaca meet the requirements of 40 CFR Part 63 Subpart FFFF (MON) in lieu of 40 CFR Part 60 Subpart Kb (NSPS Kb) as allowed per §63.2535(c).

Updated Determination as of January 19, 2026:

Hexene storage tanks at Shell Polymers Monaca are subject to the requirements of NSPS Kb and comply with the closed vent system control device requirements under §60.112b(c).

Reason for Change:

Upon review of the applicable regulations during permitting activities, it was identified that the applicability of the overlap provisions in the MON were not appropriate for the hexene storage tanks. *Storage tank* definition in MON §63.2250 excludes vessels storing organic liquids that contain HAP only as impurities. Imported hexene at SPM may contain HAP only as an impurity. Therefore, the hexene tanks do not meet the definition of storage tanks under MON, cannot be assigned to any MCPU under MON, and the use of overlap provisions of MON to comply with NSPS Kb is not applicable.

Gap Closure:

The control requirements in the MON and in NSPS Kb both allow for control using a closed vent system and control device. The tanks were controlled under the MON, and as such, the tanks were appropriately controlled as required under NSPS Kb.

The initial notification, initial report, and semi-annual reporting will be submitted as part of the gap closure. The initial report will contain a control plan under §60.113b(c) for the continuous vent thermal oxidizer (CVTO) (non-flare) primary control device. The semi-annual reports will contain closed vent system compliance data under §60.115b(d) for times when the multi-point ground flare (MPGF) CVTO Trip Header (backup control device) is in use.

Attachment 2

40 CFR Part 60 Subpart NNN Applicability Determination Update Summary

Rule:

40 CFR Part 60 Subpart NNN - Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations After December 30, 1983, and on or Before April 25, 2023

Affected Distillation Operations:

- C3 Adsorber (C-13801)
- Deethanizer (C-13802)
- Demethanizer (C-14101)
- C2 Splitter (C-14301)
- Gasoline Redistillation Tower (C-15801)

Determination Prior to January 12, 2026:

Process vents from distillation operations at Shell Polymers Monaca meet the requirements of 40 CFR Part 63 Subpart YY (EMACT) in lieu of 40 CFR Part 60 Subpart NNN (NSPS NNN) as allowed per §63.1100(g)(2)(ii).

Updated Determination as of January 12, 2026:

Demethanizer C-13802 tail gas vent is subject to the vent stream requirements of NSPS NNN. Other identified distillation operations' continuous vent(s) are routed back to the process and indirectly end up at the demethanizer. Therefore, there are no separate vent stream requirements for these other identified distillation operations, and they may be grouped with the demethanizer for reporting.

Reason for Change:

Upon review of the applicable regulations during permitting activities, it was identified that the applicability of the overlap provisions in EMACT were not appropriate for the demethanizer vent. The change was found to be consistent with prior USEPA applicability determination, Shell Norco Chemical Plant applicability determination, and the regulatory definitions in relevant subparts. USEPA Region 4 September 27, 2002, applicability determination that distillation operations' vents routed to fuel gas systems and subject to 40 CFR Part 60 Subpart NNN but not subject to the HON (MACT Rule similar to EMACT) cannot follow the MACT requirements and be exempted from Subpart NNN. Shell Norco Chemical Plant East Site semi-annual reporting for 40 CFR Part 60 Subpart NNN identifies that the OP-1 demethanizer routes its vent stream to the fuel gas system and is subject to requirements of the Subpart. Ethylene process vent definition in EMACT §63.1103(e)(2) excludes vents that do not contain HAP or vents that are routed to fuel gas systems. Therefore, the demethanizer vent is not subject to EMACT and the use of the overlap provisions is not applicable.

Gap Closure:

The control requirements in EMACT are equal to or more stringent than the control requirements in NSPS NNN. The vents were controlled under EMACT, and as such, the distillation operations were appropriately controlled as required under NSPS NNN.

The initial notification and semi-annual reporting will be submitted as part of the gap closure. Semi-annual reports to identify demethanizer vent stream routing to fuel gas system, when furnaces were not operating during the period, if/when pilot flames were absent on the HP Flares receiving fuel gas, any process equipment or operation changes that would increase flow rate, any recalculation of TRE index value for the vent stream.

Attachment 3

40 CFR Part 60 Subpart RRR Applicability Determination Update Summary

Rule:

40 CFR Part 60 Subpart RRR - Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes After June 29, 1990, and on or Before April 25, 2023

Affected Reactor Processes:

- Cracking Furnace 1 (F-10101)
- Cracking Furnace 2 (F-10201)
- Cracking Furnace 3 (F-10301)
- Cracking Furnace 4 (F-10301)
- Cracking Furnace 5 (F-10501)
- Cracking Furnace 6 (F-10601)
- Cracking Furnace 7 (F-10701)
- C2 Hydrogenation Reactor (R-13901)

Determination Prior to January 12, 2026:

Process vents from reactor processes at Shell Polymers Monaca meet the requirements of 40 CFR Part 63 Subpart YY (EMACT) in lieu of 40 CFR Part 60 Subpart RRR (NSPS RRR) as allowed per §63.1100(g)(2)(ii).

Updated Determination as of January 12, 2026:

Process vents from reactor processes at Shell Polymers Monaca are routed to a distillation unit subject to 40 CFR Part 60 Subpart NNN, have no other releases to the air except for pressure relief valves, and are therefore exempt from the requirements of 40 CFR Part 60 Subpart RRR except for §60.705(r).

Reason for Change:

Upon review of the applicable regulations during permitting activities, it was identified that the applicability of the overlap provisions in EMACT were not appropriate for the reactor processes. The change was found to be consistent with prior USEPA applicability determination, Shell Norco Chemical Plant applicability determination, and the regulatory definitions in relevant subparts. USEPA Region 6 April 28, 2000, applicability determination that 40 CFR Part 60 Subpart RRR is applicable to an olefins plant's pyrolysis and acetylene reactors whose vent streams are routed to a fuel gas system. Shell Norco Chemical Plant East Site July 30, 2008, initial notification for 40 CFR Part 60 Subpart RRR that the OP-1 Unit pyrolysis furnace F-177 routes its vent stream to the demethanizer system. Ethylene process vent definition in EMACT §63.1103(e)(2) excludes vents that do not contain HAP or vents that are routed to fuel gas systems. Therefore, the demethanizer vent is not subject to EMACT and the use of the overlap provisions is not applicable.

Gap Closure:

The initial report will be submitted as part of the gap closure. Initial report with a process description to demonstrate that reactor processes meet exemption by routing their continuous vent to the demethanizer subject to 40 CFR Part 60 Subpart NNN.