27	00-FM-AQ0023 Rev. 1/2008 pennsylvania DEPARTMENT OF ENVIRONMENTAL PROTECTION		INSPECTION REPORT				Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program			
	2/24 SM □ GP [Permit #(s): PA-04-00740A, B, C	Expiration	n Date:	Case 04 -		F ID #: 7 5836		
	_{mpany Name:} nell Chemical Appalachia LLC		Municipality: Potter Township	County: Beaver						
SH /Pl	nt Name: IELL CHEM APPALACHIA ETROCHEMICALS COMPLEX		Physical Location: Route 18	Federal ID — Plant Code #: 46-1624986-1						
W	sponsible Official: illiam Watson			Mailing A	ddress: ankfort Ro	ad				
	eneral Manager			Mona	ca, PA 1506	31-2	210			
	one #(s): 24-709-2825									
M	ark (X) All Inspection Types T	hat	Apply To This In	spectio	n:					
	Full Compliance Evaluation (FCE)		Plan Approval Inspection	on			File Review (FR)			
	Operating Permit Inspection (PI)		Initial Permit Inspection	ı (IPI)		\boxtimes	Complaint Inspection	(CI)		
\boxtimes	Routine/Partial (RTPT)		Follow-Up Inspection (Ref. Date:)		Sample Collection (SC)			
	Minor Source(s) Inspection (RFD)		Stack Test Observation	า			Multi-Media Inspection	n (MM)		
	Other:		Announced							
An	nual Compliance Certification Received:] YE	S □ NO ☑ N/A	Date Received:						
AII	MS Report Received:] YE	S NO NA	Date Received:						
M	ark (X) All Activities That App	ly:								
	File Review		Pre-Inspection Briefing		I					
	Pre-Inspection Observations		Check For New/Unrepo	orted Sour	ces		Sample(s) Collected			
	Visible Emissions Observations		Verify Operation of CE	MS			Other			
I in by ste	•	Be cilit bse d C	eaver this mid-day today from 12:35 erve any visible, fugooling Towers. Th	oday ar PM to gitive or e weath	nd did not ol 2:35 PM. In malodor en ner was part	bser was niss lly cl	located across t ions today. I obs oudy, dry and 44	he Ohio River served only degrees F.		
	mpany Representative: EMO TO FILE	Tit	le:		Signature:			Date:		
	P Representative:	Tit	le:		Signature:			Date/Time:		
	cott Beaudway		r Quality Specialist				y/SB	2/2/24		
ins	s document is official notification that a representa pection are shown above and on any attached pac ults or from any additional review of Department r	jes, a	nd may include violations und	overed duri	ng the inspection.	Violati				

Page 1 of 3 eFacts Inspection ID#: 3705551 Date: 2/2/24 Reviewed By

Shell Chemical Appalachia LLC, 04-00740

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: 02/02/2024 12:35 PM to 2:35 PM Source and Controls Status 031 Ethane Cracking Furnace 1 – Operating 032 Ethane Cracking Furnace 2 – Operating (Decoke) 033 Ethane Cracking Furnace 3 – Operating 034 Ethane Cracking Furnace 4 - Operating 035 Ethane Cracking Furnace 5 - Operating (Hot Steam Standby) 036 Ethane Cracking Furnace 6 - Operating 037 Ethane Cracking Furnace 7 –Not Operating (No Pilots) 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 –Operating 202 Polyethylene Manufacturing Lines -PE1 Operating PE2 Operating PE3 Not Operating 203 Process Cooling Tower - Operating 204 Low Pressure (LP) Header System – Not Operating LP Incinerator/ Operating all headers of the Multipoint **Ground Flare** 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 301 Polyethylene Pellet Material Storage/Handling/Loadout - 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

501 Equipment Components - Operating 502 Wastewater Treatment Plant - Operating

406 Storage Tanks (Diesel Fuel > 150 Gallons) - Operating

408 Storage Tanks (Diesel Fuel < 150 Gallons) - Operating

409 Methanol Storage Vessels and Associated Components -Operating

407 Storage Tanks (Pyrolysis Fuel Oil) - Operating

Shell Chemical Appalachia LLC, 04-00740

503 Plant Roadways - In Use

All Listed Controls Operating

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
02-Feb-24 12:00:00	0.88	11.82	79.92	3.86	0.00	2.36	0.20	0.04	0.07	0.68	0.17	100.00
02-Feb-24 13:00:00	0.87	11.70	80.31	3.76	0.00	2.35	0.10	0.04	0.03	0.67	0.15	100.00
02-Feb-24 14:00:00	0.88	11.59	80.54	3.66	0.00	2.36	0.08	0.04	0.02	0.66	0.16	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
02-Feb-24 12:00:00	1.14	26.02	67.48	2.94	0.00	1.55	0.04	0.01	0.32	0.47	0.02	100.00
02-Feb-24 13:00:00	1.12	25.93	67.78	2.78	0.00	1.53	0.04	0.01	0.33	0.46	0.02	100.00
02-Feb-24 14:00:00	1.13	26.07	67.65	2.77	0.00	1.52	0.04	0.01	0.32	0.46	0.02	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
02-Feb-24 12:00:00	0.04	18.67	77.53	3.56	0.00	0.00	0.06	0.01	0.00	0.00	0.13	100.00
02-Feb-24 13:00:00	0.03	18.67	77.73	3.37	0.00	0.00	0.05	0.01	0.00	0.00	0.13	100.00
02-Feb-24 14:00:00	0.03	18.64	77.80	3.34	0.00	0.00	0.05	0.01	0.00	0.00	0.12	100.00

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