27	700-FM-AQ0023 Rev pennsy			INSPECTION REPORT				Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program				
	ate(s) of Inspection:	TV PA SM GP MEGA]	Permit #(s): PA-04-00740A, B, C	B, C Expiration Da		Case #: 04-00740		PF ID #: 775836			
	ompany Name: hell Chemical <i>A</i>	Appalachia LLC		Municipality: Potter Township			County: Beaver					
SI /P	ant Name: HELL CHEM APPA ETROCHEMICALS			Physical Location: Route 18			Federal ID — Plant Code #: 46-1624986-1					
	esponsible Official: /illiam Watson			Mailing Address: 300 Frankfort Ro				pad				
	eneral Manage	r		Monaca, PA 1500			61-2210					
	one #(s): 24-709-2825											
M	lark (X) All Insp	ection Types Th	nat	Apply To This In	spection	n:						
	Full Compliance Eva	aluation (FCE)		Plan Approval Inspection	on			File Review (FR)				
	Operating Permit Ins	spection (PI)		Initial Permit Inspection	ı (IPI)		\boxtimes	Complaint Inspection (CI)				
X	Routine/Partial (RTF	PT)		Follow-Up Inspection (Ref. Date:)				Sample Collection (SC)				
	Minor Source(s) Insp	pection (RFD)		Stack Test Observation				Multi-Media Inspection (MM)				
	Other:			Announced								
Ar	nnual Compliance Cert	ification Received:	YES	S NO N/A Date Received				d:				
ΑI	MS Report Received:		YES	S NO N/A		Date Received						
M	lark (X) All Activ	vities That Appl	y:									
	File Review			Pre-Inspection Briefing				Exit Interview/Briefing				
	Pre-Inspection Obse	ervations		Check For New/Unreported Sources				Sample(s) Collected				
	Visible Emissions Ol			Verify Operation of CEMS				Other				
S I i	observed the Sh hemicals facility	ca, Center Towns ell Chemicals fac . I did not observ	S: 2 ship cility e a	21112 and Potter Towns today from 9:37 A ny visible, fugitive	ship this AM to 1 or mal	s morning ar 0:40 AM. To odor emission	nd d was	id not observe located at Gat today. I observ	e #3 of the Shell			
l d by	Chemicals facility. I did not observe any visible, fugitive or malodor emissions today. I observed only steam from the Elevated Flare and Cooling Towers. The weather was clear, dry and 28 degrees F. I observed the Shell Chemicals facility today from 10:50 AM to 11:50 AM. I was located across the Ohio River by the Dock 6 building. I did not observe any visible, fugitive or malodor emissions today. I observed only steam from the Elevated Flare and Cooling Towers. The weather was clear, dry and 39 degrees F. I inspected Industry, Vanport and Beaver mid-day today and did not observe any malodors.											
С	ompany Representativ	e:	Title	: :		Signature:			Date:			
M	IEMO TO FILE											
	EP Representative:		Title Air	tte: Signature: Scott Beau			dwa	y/SB	Date/Time: 2/20/24			
Th	is document is official not	ification that a represental	ive of	the Department of Environr	nental Prot	ection, Air Quality F	Progra	m, inspected the identif	ied 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.

Page 1 of 3 eFacts Inspection ID#: 3714298 Date: 2/20/24 Reviewed By

Shell Chemical Appalachia LLC, 04-00740

501 Equipment Components - Operating 502 Wastewater Treatment Plant - Operating

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: 02/20/2024 9:37 AM to 11:50 AM Source and Controls Status 031 Ethane Cracking Furnace 1 – Operating 032 Ethane Cracking Furnace 2 - Operating (Hot Steam Standby) 033 Ethane Cracking Furnace 3 - Operating 034 Ethane Cracking Furnace 4 - Operating 035 Ethane Cracking Furnace 5 – Operating 036 Ethane Cracking Furnace 6 – Operating (Hot Steam Standby) 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 (online at ~11:20) PE3 Not Operating 203 Process Cooling Tower - Operating 204 Low Pressure (LP) Header System - Operating LP Incinerator and Operating 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) –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

Shell Chemical Appalachia LLC, 04-00740

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
20-Feb-24 09:00:00	55.87	10.15	30.38	1.24	0.00	2.31	0.04	0.01	0.00	0.00	0.00	100.00
20-Feb-24 10:00:00	54.04	12.13	29.94	1.34	0.00	2.47	0.04	0.03	0.00	0.00	0.00	100.00
20-Feb-24 11:00:00	49.16	15.74	30.17	1.40	0.00	2.50	0.05	0.03	0.95	0.00	0.00	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
20-Feb-24 09:00:00	0.61	83.15	9.63	0.56	0.00	1.44	0.09	3.00	0.96	0.54	0.03	100.00
20-Feb-24 10:00:00	0.61	83.21	9.49	0.57	0.00	1.41	0.10	3.09	0.94	0.54	0.03	100.00
20-Feb-24 11:00:00	0.58	84.25	8.66	0.53	0.00	1.32	0.08	2.65	1.39	0.50	0.04	100.00

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
20-Feb-24 09:00:00	0.03	16.48	78.76	4.43	0.00	0.00	0.14	0.03	0.00	0.00	0.12	100.00
20-Feb-24 10:00:00	0.03	16.42	78.59	4.63	0.00	0.00	0.15	0.04	0.00	0.00	0.14	100.00
20-Feb-24 11:00:00	0.03	16.48	78.45	4.69	0.00	0.00	0.16	0.04	0.00	0.00	0.15	100.00

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