

April 17, 2023

## **REQUEST FOR CONTROL 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 Petrochemical Complex Potter Township Beaver County

Dear Kimberly Kaal:

An April 3, 2023 review of the report submitted by Shell Chemical Appalachia LLC ("Shell") Petrochemicals Complex on March 27, 2023 identified violations of 25 Pa. Code § 127.25. Specifically, Shell reported to the Department that from January 25, 2023 through February 16, 2023, malodor emissions were observed outside of Shell's property, caused by hydrocarbons in the Wastewater Treatment Plant (WWTP) biotreaters. A valve left open between the WWTP and a set of liquid hydrocarbon-containing drums associated with the ECU caused hydrocarbons from the drums to be pumped to the WWTP.

PA-04-00740C, Section B, Condition #013, states in relevant part, "[a] person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices". Shell caused violations of PA-04-00740C and 25 Pa. Code § 127.25. A Notice of Violation was sent to your attention on April 17, 2023.

The Department requests that within **fifteen** (15) **days** of receipt of this letter, Shell Chemical Appalachia LLC ("Shell") Petrochemicals Complex submit a control plan including information about new and existing employee training to prevent reoccurrence to Elizabeth Speicher at Department of Environmental Protection, Air Quality Program, 400 Waterfront Drive | Pittsburgh, PA 15222-4745. The control plan should include a detailed description of any planned corrective action(s) to address the violation(s) and should identify a schedule, with applicable milestones indicated, for implementation and completion of these corrective action(s). This Request for Control 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 an enforcement action is appropriate, you will be notified of the action.

If you have any questions regarding this Request for Control Plan, you may contact me at <u>sbeaudway@pa.gov</u> or at 412-417-7952.

Sincerely,

Sincerely,

Scott Beaudway/SB

Scott Beaudway Air Quality Specialist Air Quality

cc: E. Speicher, Environmental Group Manager K. Goddard, Compliance Specialist Central Office (via email) 04-00740 Enforcement File