

NOTICE OF VIOLATION

4/5/2024

VIA EMAIL: [Kimberly Kaal@shell.com)]

Kimberly Kaal, Environmental Manager
Shell Chemical Appalachia LLC
300 Frankfort Road
Monaca, PA 15061

Re: PA-04-00740C
Source IDs: [031, 032, 033, 034, 035, 036, 037] stack testing
Shell Petrochemicals Complex
Potter Township
Beaver County

Dear Kimberly Kaal:

The Shell Chemical Appalachia LLC (“Shell”) Petrochemicals Complex is authorized to operate pursuant to plan approval PA-04-00740C. The Department of Environmental Protection (DEP) has reviewed stack testing results for various air contamination sources at the facility performed on several dates in 2022 and 2023. The stack test reports show the following violations:

1. PA-04-00740C, Section E, Condition # 005 states that PM10 and PM2.5 emissions from each of the ethane cracking furnaces shall not exceed the following: 3.10 lb/hr under normal operating conditions and 1.86 lb/hr during periods of decoking. The performance tests for particulate matter were evaluated by the Department’s Source Testing Section and were determined to be acceptable. The following sources exceeded these PM10 & PM2.5 limits under normal operating mode, as established in the Plan Approval in violation of 25 Pa. Code § 127.12b.

Source	Test Date	Operating Mode	PM10 & 2.5 Limits (lb/hr)	PM10 Results (lb/hr)	PM2.5 Results (lb/hr)
032	2/8/2023	Normal	3.10	10.2	7.6
033	1/17/2023	Normal	3.10	12.5	12.2
034	1/16/2023	Normal	3.10	9.8	9.4
036	1/18/2023	Normal	3.10	5.2	4.8

2. PA-04-00740C, Section E, Condition #011 states the “Owner/Operator shall perform VOC, PM10, PM2.5, NH3, and n-Hexane emission testing upon each of the seven ethane cracking furnaces... [i]nitial performance testing is required within 180 days of start- up... .” Initial testing was performed within 180 days of start-up for each of the furnaces except Source 037. However, results of some of these tests are unacceptable. Unacceptable test results cannot be used to demonstrate compliance. The initial tests were deemed to be unacceptable for the following sources for specific pollutants indicated below:

Source	Test Due Date	Initial Test Date	Pollutant(s) with Unacceptable Initial Test Result	Re-Test Date with Acceptable Results
031	2/23/2024	12/22/2022	VOC (THC)	None
033	2/26/2023	1/17/2023	n-Hexane	8/22/2023
034	3/1/2023	1/16/2023	VOC (THC), NH3, n-Hexane	8/25/2023
035	2/26/2023	12/21/2022	VOC (THC)	None
037	2/2/2023	3/23/2023*	VOC (THC)	None

*indicates late initial test

By failing to conduct any testing for any parameters within 180 days of start-up for Source 037 and by not conducting compliant testing within 180 days of start-up for the parameters at Sources 031, 033, 034 and 035, as identified in the above table, Shell violated 25 Pa. Code § 127.12b

The above listed violations constitute unlawful conduct and a public nuisance pursuant to Sections 8 and 13 of the Air Pollution Control Act (APCA), 35 P.S. Sections 4008 and 4013, respectively. Violations of DEP’s air quality regulations are subject to the penalties of Sections 9 and 9.1 of the APCA. Each day the violation continues constitutes a separate offense.

This Notice of Violation is neither an order nor any other final action of DEP. It neither imposes nor waives any enforcement action available to DEP under any of its statutes. If DEP determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions concerning this matter, please contact me at espeicher@pa.gov or at 412.442.5214.

Sincerely,

Elizabeth Speicher
Environmental Group Manager-Operations
Air Quality

cc: Scott Beaudway, Air Quality Specialist
Timothy Kuntz, Air Quality Compliance
Central Office (via email)
Enforcement File