Shell Chemical Appalachia LLC
300 Frankfort Rd
Monaca, PA 15061

June 27, 2024

BY ELECTRONIC MAIL

Shawn Bell, Water Quality Specialist
Clean Water Program/Pennsylvania Department of
Environmental Protection/Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222

RE: Notice of Violation Dated June 18, 2024, for Shell Chemical Appalachia LLC

Dear Shawn:

Shell Chemical Appalachia LLC (Shell) submits this Notice of Violation (NOV) Response as requested by the Pennsylvania Department of Environmental Protection (PADEP) on June 18, 2024. PADEP's request was sent with a Notice of Violation for National Pollutant Discharge Elimination System (NPDES) Permit PA0002208, issued March 1, 2021. The NOV shows that Shell exceeded several outfall effluent limitations established by the NPDES Permit. These permit exceedances were reported as required via PADEP's Non-Compliance Forms submitted through Greenport's Electronic Discharge Monitoring Report (eDMR) for Outfall 004. This Response Report incorporates the specific information requested by PADEP and is organized accordingly.

Causes of the Non-Compliances

The Non-Compliances reported for April 2024 as stated in the NOV are:

Parameter	Limit Type	Monitoring Period	Outfall	Reported Value	Permit Limit
Biochemical Oxygen Demand (BOD5)	Average Monthly	APR 2024	004	32.7 mg/L	27 mg/L
Di-n-Butyl Phthalate	Daily Maximum	APR 2024	004	<.7 lbs/day	.608 lbs/day
Biochemical Oxygen Demand (BOD5)	Average Monthly	APR 2024	004	385 lbs/day	287 lbs/day
Di-n-Butyl Phthalate	Average Monthly	APR 2024	004	<.3 lbs/day	.288 lbs/day

BOD Exceedance

During a record storm event, beginning on April 1, 2024, multiple rainfall totals exceeded 7.37 Inches which contributed to the Outfall 004 overflow. The discharge was a mixture of the significant rain event and Accidently Contaminated (AC) Drainage contributing to the overflow of the Diversion Box directly to the AC Pond. Under normal conditions the Diversion Box would send water directly into the wastewater treatment system as opposed to being in overflow conditions directed to the AC Pond.

Di-n-Butyl Phthalate Exceedance

Upon receipt of sample data from Outfall 004, it was noted the reported results from instrument detection limits were higher than previously reported from 3rd party laboratory. During the QA/QC process, it was determined through contacting the 3rd party laboratory, that the 3rd party laboratory failed to communicate to Shell that the reporting limit on the analytical equipment was increased from 10 to 100 ug/L. This change in detection level resulted in the sample result to be reported at the new minimum detection level (MDL) for this compound, which resulted in a value that exceeded the permit condition. We do not believe we exceeded the permit limit however we cannot definitively assess this due to the laboratory's change in the detection limit. Due to hold times for samples, multiple samples were able to be rerun utilizing a low-level method for more accurate results, however the earlier samples which contributed to this exceedance were not able to be reanalyzed.

Compliance Status

AC Pond BOD Improvement

To mitigate the threat of BOD exceedance during future AC Pond overflow events, Shell intends to return the AC pond to its original design intent of running empty during dry weather periods. This improvement will provide an additional ~10% of available AC pond capacity and will provide an additional barrier to excessive algae formation on the pond, which is believed to be the main contributor to the BOD exceedance. This change is now possible through enhancement in available sump cleaning technology via one of the site's third-party contractors.

Di-n-Butyl Phthalate Reporting

The discrepancy of the detection limit has been corrected on recent lab reports. Additional quality control and quality assurance has been implemented between Shell and the 3rd Party laboratory to prevent this issue from reoccuring.

Schedule:

1. Schedule for AC Pond cleaning is anticipated to begin 3rd-4th Quarter 2024 based on availability of service from contracted vendor.

Sincerely,

William Watson
Operations Manager