



**REVISED NOTICE OF VIOLATION**

October 23, 2024

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

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

Re: PA-04-00740C  
Shell Petrochemicals Complex  
12-month Rolling Emission Exceedances (September 2024)  
Potter Township  
Beaver County

Dear Kimberly Kaal:

**This letter replaces the previous Notice of Violation sent to your attention on October 16, 2024, regarding 12-month Rolling Emission Exceedances at the Shell Petrochemicals Complex. The October 16 Notice of Violation used incorrect dates. Corrected dates are noted below.**

The Shell Chemical Appalachia LLC ("Shell") Petrochemicals Complex ("Facility") is authorized to be constructed and for temporary operation pursuant to plan approvals PA-04-00740A, PA-04-00740B, and PA-04-00740C. On October 15, 2024, Shell provided emissions data, including 12-month rolling totals for the month of September 2024. Following review of this data, the Department of Environmental Protection (DEP) has noted the following violation:

Section C, Condition #005 of PA-04-00740C imposes 12-month rolling total emission limitation of 328.5 tons of Nitrogen Oxides (NO<sub>x</sub>). The 12-month rolling emissions data provided by Shell for the 12-month period ending in September 2024 total NO<sub>x</sub> emissions reached 361.4 tons. By exceeding the 12-month rolling emissions total for NO<sub>x</sub>, Shell violated Section C, Condition #005 of PA-04-00740C and 25 Pa. Code § 127.25.

The above violation constitutes unlawful conduct and a public nuisance as defined by 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 [tkuntz@pa.gov](mailto:tkuntz@pa.gov).

Sincerely,

Tim Kuntz/TK

Air Quality District Supervisor  
Air Quality Program

cc: M. Gorog - Program Manager  
V. Shaffer - District Supervisor  
SW OCC - M. Heilman  
SW ARD – K. Halloran  
Central Office (via email)  
04-00740 Enforcement File