



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

INSPECTION REPORT

Commonwealth of Pennsylvania
Department of Environmental Protection
Air Quality Program

Date(s) of Inspection:

TV ☐
SM ☐
NM ☐

PA ☒
GP ☐
MEGA ☐

Permit #(s):

04-740

Expiration Date:

Case #:

04-740

PF ID #:

775898

Company Name:

Shell Chemicals Appalachia Potter Twp.

Municipality:

County:

Beaver

Plant Name:

Petrochemical Complex

Physical Location:

Route 18

Federal ID — Plant Code #:

46-1624986-1

Responsible Official:

Nathan Levin

Mailing Address:

300 Frankfort Rd.

Title:

General Manager

Monaca, PA 15061-2210

Phone #(s):

Mark (X) All Inspection Types That Apply To This Inspection:

- | | | |
|--|--|--|
| <input type="checkbox"/> Full Compliance Evaluation (FCE) | <input type="checkbox"/> Plan Approval Inspection | <input type="checkbox"/> File Review (FR) |
| <input type="checkbox"/> Operating Permit Inspection (PI) | <input type="checkbox"/> Initial Permit Inspection (IPI) | <input type="checkbox"/> Complaint Inspection (CI) |
| <input checked="" type="checkbox"/> Routine/Partial (RTPT) | <input type="checkbox"/> Follow-Up Inspection (Ref. Date: _____) | <input type="checkbox"/> Sample Collection (SC) |
| <input type="checkbox"/> Minor Source(s) Inspection (RFD) | <input type="checkbox"/> Stack Test Observation | <input type="checkbox"/> Multi-Media Inspection (MM) |
| <input type="checkbox"/> Other: | <input type="checkbox"/> Announced | |

Annual Compliance Certification Received: ☐ YES ☐ NO ☐ N/A

Date Received:

AIMS Report Received: ☐ YES ☐ NO ☐ N/A

Date Received:

Mark (X) All Activities That Apply:

- | | | |
|---|---|---|
| <input type="checkbox"/> File Review | <input checked="" type="checkbox"/> Pre-Inspection Briefing | <input checked="" type="checkbox"/> Exit Interview/Briefing |
| <input checked="" type="checkbox"/> Pre-Inspection Observations | <input type="checkbox"/> Check For New/Unreported Sources | <input type="checkbox"/> Sample(s) Collected |
| <input type="checkbox"/> Visible Emissions Observations | <input type="checkbox"/> Verify Operation of CEMS | <input type="checkbox"/> Other |

Comments/Recommendations:

Enforcement since last FCE ☐ Yes ☒ No (If yes, attach summary)

I performed a Routine Partial Inspection (RTPT) of Shell Chemicals facility in Potter Twp.

Today US EPA was performing a site inspection of the shell chemicals facility. I was on site to observe the US EPA inspection.

A Attendees sign in sheet was not distributed today, but should be similar to the list included in the 10/21/24 RTPT.

Compliance Status: ☒ In ☐ Out ☐ Pending ☐ Awaiting Co. ReportNeeds a Follow-Up Inspection? ☐ Yes ☒ No

Company Representative:

Kimberly Kline

Title:

Env. manager

Signature:

[Signature]

Date:

10/24/24

DEP Representative:

Scott Beaudry

Title:

AQS

Signature:

[Signature]

Date/Time:

10/24/24

This document is official notification that a representative of the Department of Environmental Protection, Air Quality Program, inspected the identified 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.

eFacts Inspection ID#:

3856168

Date:

10/24/24

Reviewed By

☐ Yellow — Site☐ Pink — District Office

Page 1 of 3
☐ White — Regional Office



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

INSPECTION REPORT

Continued

Commonwealth of Pennsylvania
Department of Environmental Protection
Air Quality Program

Mike Lukowich, US EPA NEIC, Timothy Simjan, PA DEP, Clean Water and myself discussed the April 2023 WWTP malodor event.

There were various break out sessions today with different groups of Shell and EPA / EPA NEIC staff discussing different topics which included: 90 day yard (RCRA), Industrial Stormwater (Clean Water), CW/RCRA document Review, Flare Overview, BWON, Furnace CEMS, and LDAR.

EPA / EPA NEIC discussed BWON with Shell. Shell will have a Third Party, ProTect, to assist with BWON at the facility. ProTect is a specialist in this field, to ensure compliance.

I accompanied US EPA / EPA NEIC on a site inspection of the High Pressure Ground Enclosed Flares (HPGEF) and Elevate Flare. Both HPGEF's were in operation today. US EPA NEIC and Shell operated a FLIR camera during this inspection. The FLIR cameras used at ~~the~~ the Flares today, were intrinsically safe.

EPA NEIC discussed the LDAR program with Shell.

EPA NEIC asked me if PA DEP was going to take enforcement action for the late submittal of the Title V permit application. I ~~referred~~ referred them to PA DEP AQ Management for an answer to their question.

EPA NEIC and Shell discussed the ECF CEMS operation.

Company -- plant name:

Shell Chemicals

Initials of representative interviewed:

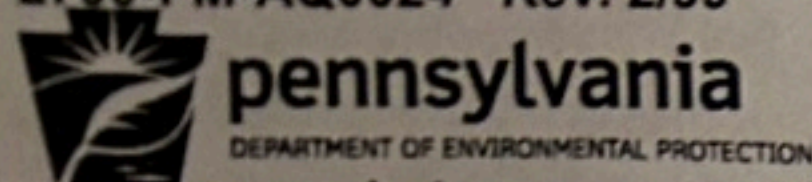
Date:

10/24/24

Page 2 of 3

Reviewed By _____

☐ White -- Site☐ Yellow -- District Office☐ Pink -- Regional Office



INSPECTION REPORT

Continued

Commonwealth of Pennsylvania
Department of Environmental Protection
Air Quality Program

I did not observe any visible, fugitive or malodor emissions from the HPGFs or Elevated Flare during my site inspection today.

Typically 6 of the 7 ECF are in operation during normal operations. The 7th ECF is either in Decoking operation or on Stand-By.

EPA NEIC discussed potential additional source of Benzene emissions.

The Plan for tomorrow is to meet on site at 9:00 AM. USEPA / EPA NEIC will have an internal meeting first thing in the morning. USEPA / EPA NEIC will conduct a final meeting / discussion tomorrow morning. It is not anticipated that any field inspection will be performed tomorrow.

I was on-site today, except for a lunch break, from 0830 to 1515 today. I did not observe any visible, fugitive or malodor emissions during my inspection today.

Company -- plant name:

Initials of representative interviewed:

Date:

Shell chemicals-

10/24/24

Page 3 of 3

Reviewed By _____

☐ White -- Site

☐ Yellow -- District Office

☐ Pink -- Regional Office

10/24/2024 8:30 AM to 3:15 PM Source and Controls Status

031 Ethane Cracking Furnace 1 –Operating
032 Ethane Cracking Furnace 2 –Operating
033 Ethane Cracking Furnace 3 –Operating
034 Ethane Cracking Furnace 4 –Operating
035 Ethane Cracking Furnace 5 –Operating
036 Ethane Cracking Furnace 6 – Not Operating (no pilots)
037 Ethane Cracking Furnace 7 –Operating

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 Not Operating
 PE2 Operating
 PE3 Operating
203 Process Cooling Tower - Operating
204 Low Pressure (LP) Header System –Operating LP Incinerator/ Operating the 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 C3+ and Isobutane
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

501 Equipment Components - Operating
502 Wastewater Treatment Plant - Operating
503 Plant Roadways - In Use

All Listed Controls Operating