

2700-FM-AQ0023 Rev. 1/2008 pennsylvania <small>DEPARTMENT OF ENVIRONMENTAL PROTECTION</small>			INSPECTION REPORT		Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program	
Date(s) of Inspection: 11/19/24		TV <input checked="" type="checkbox"/> SM <input type="checkbox"/> NM <input type="checkbox"/> PA <input type="checkbox"/> GP <input type="checkbox"/> MEGA <input type="checkbox"/>	Permit #(s): 04-740	Expiration Date: 4/28/25	Case #: 04-740	PF ID #: 775836
Company Name: Shell Chemicals App.			Municipality: Potter Twp.		County: Beaver	
Plant Name: Petrochemical Cplx			Physical Location: Rt 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): 724-709-2825						

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: <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	Date Received:
AIMS Report Received: <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	Date Received:

Mark (X) All Activities That Apply:

<input checked="" 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 checked="" type="checkbox"/> Check For New/Unreported Sources	<input type="checkbox"/> Sample(s) Collected
<input checked="" 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)

Today I performed a Routine Partial Inspection at Shell Chemical Appalachia LLC facility in Potter Twp. I accompanied Brad Spauld and Luke Bishop, PA DEP AQ Engineers who were onsite today performing an Initial Operating Permit Inspection for source in the Plan Approval PA-04-00740C, which was issued on 2/18/21, revised on 10/19/24 and will expire on 4/28/25. The facility is in operation today. Shell personnel were Kim Kotel, Alan Binder, Lauren Uffelman, Fred Mullner and Gina Batiz.

Compliance Status: <input checked="" type="checkbox"/> In <input type="checkbox"/> Out <input type="checkbox"/> Pending <input type="checkbox"/> Awaiting Co. Report	Needs a Follow-Up Inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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Company Representative: Alan Binder	Title: Environmental Eng.	Signature:	Date: 11/19/24
DEP Representative: Scott Beaudway	Title: AQS	Signature:	Date/Time: 11/19/24

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.

INSPECTION REPORT

Continued

Commonwealth of Pennsylvania
 Department of Environmental Protection
 Air Quality Program

We inspected the facility today and examined the sources relevant to the Initial Operating Permit Inspection.

The following sources were inspected today =
 Ethylene Storage Tank, Off Spec Ethylene Storage Tank (The off spec Ethylene is subsequently reintroduced to the process for recovery/refining), Ethylene Buffer Vessel, 409 Methanol Storage Vessels and Associated Components, Hydrogen Trailers (for the PE Process), Two C3+ Spheres, Butene Sphere, 405 Iso Butane Storage Bullets (used in the PE Process), Propane (used as ~~15C4~~ Refrigerant PE3 Heavies (hydrocarbon chain product shipped off site), Two Iso Pentane Storage Bullets (used in PE), Two Hexene Tanks FFR (used in PE Process), Two PFO Tanks (Pyrolysis Fuel Oil) (Fixed Roof, Heaviest material from ECF, sold as a product), LGO Tank (Light Gasoline, product from ECF, ~~IFR~~ IFR, sold as product), C204A Continuous Vent Thermal Oxidizer (Controls emissions from multiple sources),

The facility is in the process of replacing the Gas Chromatographs with new GCs and adding calorimeters to determine Net Heating Value. The new systems are not yet operational.

C204B Multi Point Ground Flare (3 Flare Header, CUTO header, Ethylene Tank Header, PE Episodic Header),

Both the CUTO and MFGF are in service and normal operation

Company -- plant name: 2 Shell Chemicals Initials of representative interviewed: _____ Date: 11/19/24

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

303 and 304 Liquid Loadout (Rail Car Loading), and Rail Car Unloading.

A Butane Rail Car was being vented to the CUTO. I did not observe any visible fugitive or malodor emissions. A Vapor Recover Line is used, as needed depending on the material.

In the afternoon Brad and Luke examined the records required for the IPI.

I was on site today from approximately 0910 to 1510. I did not observe any visible fugitive or malodor emissions during my inspection today.

Company -- plant name:

Shell chemicals

Initials of representative interviewed:

Date:

11/19/24

Page 3 of 3

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I contacted Shell Chemicals to inform them of my observations and to request the list of operating sources and control devices and an analysis of the gas composition for the material being routed to the flare. On 4/12/24 Shell Chemicals asserted that the requested information is confidential. On 11/21/24 the Department determined that "the information that Shell Chemicals has identified as confidential in their submittals will be considered confidential by the Department subject to the provisions of Section 13.2 of the Pennsylvania Air Pollution Control Act, 35 P.S. § 4013.2.

11/19/2024 9:10 AM to 3:10 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 (Hot Steam Standby)
035 Ethane Cracking Furnace 5 –Operating
036 Ethane Cracking Furnace 6 –Operating
037 Ethane Cracking Furnace 7 –Operating

101 Cogen 1 CT + DB – Operating
102 Cogen 2 CT + DB – Operating
103 Cogen 3 CT + DB – Not 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 Operating
 PE2 Operating
 PE3 Not 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) –Operating Pyrolysis Fuel Oil
304 Liquid Loadout (C3+, Butene, Isopentane, Isobutane, C3+ Ref) –Operating C3+ and Butene
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