



February 12, 2025

NOTICE OF VIOLATION

VIA EMAIL: Nathan.Levin@shell.com

Nathan Levin, General Manager
Shell Chemical Appalachia, LLC
300 Frankfort Road
Monaca, PA 15061

Re: PA-04-00740C
ECF NOx Emissions and Visible Emissions
Shell Polymers Monaca
Potter Township
Beaver County

Dear Nathan Levin:

Shell Polymers Monaca (Shell) is authorized to operate pursuant to plan approval PA-04-00740C. On December 9, 2024, Shell reported the following NOx emissions from the Ethane Cracking Furnaces (ECFs) and visible emissions from both the HP (high pressure) ground flares and emergency elevated flare, which occurred on November 8-9, 2024. See Tables 1 and 2 below.

Table 1: ECF NOx Emissions

Malfunction Date	ECF	Mode/hr	Limit (lb/hr)	Exceedance (lb/hr)	Limit (lb/MMBtu)	Exceedance (lb/MMBtu)
11/8/24	034	Normal Operations (1600-1700)	6.2	7.29	NA	NA
11/8/24	035	Decoke (1600-1700)	6.2	6.22	NA	NA
11/8/24	036	Hot Steam Standby (1400-1500)	6.2	7.52	NA	NA

11/9/24	036	Hot Steam Standby (0500-0600)	6.2	7.57	NA	NA
11/8/24	031	Normal Operations (1500-1600)	NA	NA	0.015	0.017
11/8/24	033	Normal Operations (1500-1600)	NA	NA	0.015	0.018
11/8/24	034	Normal Operations (1500-1600)	NA	NA	0.015	0.021

Table 2: Visible Emissions

Malfunction Date	Source Involved	Visible Emission Duration
11/8/24	C205C	11 minutes and 43 seconds
11/8/24	C205A	14 minutes and 54 seconds
11/8/24	C205B	24 minutes and 42 seconds

The Department has identified the following violations from these events:

1. PA-04-00740C, Section E, Source G01, Condition #007, states NO_x emissions from the Ethane Cracking Furnaces (ECF) shall not exceed the following:
 - 0.015 lb/MMBtu from each furnace on a 1-hour average, during normal operating mode.
 - 6.20 lb/hr from each furnace during periods of decoking, hot steam standby, feed in, or feed out.

By emitting NO_x in excess of these limits, Shell violated PA-04-00740C and 25 Pa. Code § 127.25.

2. PA-04-00740C, Section D, Source 205, Condition #001, states visible emissions from both the HP ground flares and emergency elevated flare shall not exceed 0% opacity except for a total of five minutes during any consecutive two-hour period. By causing visible emissions greater than 0% opacity from both the HP ground flares (Sources C205A, C205B) and emergency elevated flare (Source C205C) in excess of five minutes, Shell violated PA-04-00740C and 25 Pa. Code § 127.25.

3. 40 CFR § 60.18 (b)(1), states flares shall be designed for and operated with no visible emissions as determined by the methods specified in paragraph (f), except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. By causing visible

emissions greater than 0% opacity from both the HP ground flares (Sources C205A, C205B) and emergency elevated flare (Source C205C) in excess of five minutes, Shell violated 40 CFR § 60.18 (incorporated by 25 Pa. Code § 122.3).

25 Pa. Code § 127.25 states in part that a person may not cause or permit the operation of a source or air cleaning device unless the source or air cleaning device is operated and maintained in accordance with the conditions in the plan approval issued by the Department.

The above violations constitute 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. Persons violating 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 sbeaudway@pa.gov or at 412-417-7952.

Sincerely,

Scott Beaudway/SB

Air Quality Specialist
Air Quality

cc: S. Wiedemer, Environmental Group Manager
V. Shaffer, Air Quality District Supervisor
O. Law, Air Quality Compliance Specialist
Central Office (via email)
04-00740 Enforcement File