

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
Combustion Turbine/Duct Burner Units
Shell Polymers Monaca
Potter Township
Beaver County

Dear Nathan Levin:

Shell Polymers Monaca (Shell) is authorized to operate pursuant to plan approvals PA-04-00740C. Shell reported to the Department NO_x emissions from the Combustion Turbines with Duct Burners which exceeded plan approval limits on two dates in 2024. See Table 1 below.

Table 1: Cogeneration NO_x Emissions

Malfunction Date	Cogen	Time	Limit (ppmvd)	Exceedance (ppmvd)
2/23/24	103	2000-2200	2 ppmvd	2.986-3.821
7/4/24	102	1300-1400	2 ppmvd	2.099

The Department has identified the following violations from these events:

PA-04-00740C, Section E, Source G02, Condition #001, NO_x emissions from the Combustion Turbines with Duct Burners shall not exceed the following:
2 ppmvd @ 15% O₂ from each turbine/duct burner on a 1-hour average, excluding periods of defined startup or shutdown. By emitting NO_x in excess of this limit, Shell caused violations of PA-04-00740C and 25 Pa. Code § 127.25.

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