



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 NO<sub>x</sub> 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. Shell reported to the Department that NO<sub>x</sub> emissions from the Ethane Cracking Furnaces (ECFs) which occurred on several dates in 2024 exceeded plan approval limits, as described in Table 1 below.

Table 1: ECF NO<sub>x</sub> Emissions

Malfunction Date	ECF	Mode/hr	Limit (lb/hr)	Exceedance (lb/hr)	Limit (lb/MMBtu)	Exceedance (lb/MMBtu)
1/20/24	031	Hot Steam Standby (0700- 0800)	6.2	9.646	NA	NA
1/20/24	032	Cracking (0100- 0200)	NA	NA	0.015	0.017
1/20/24	032	Cracking (0200- 0300)	NA	NA	0.015	0.023
3/18/24	033	Startup (1500-1600)	31.1	32.064	NA	NA
6/21-22/24	033	Hot Steam Standby (2300- 0300)	6.2	9.051-23.062	NA	NA

9/30/24	036	Hot Steam Standby (1400- 1500)	6.2	6.660	NA	NA
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The Department has identified the following violations from these events:

PA-04-00740C, Section E, Source G01, Condition #007, states NO<sub>x</sub> emissions from the ECFs 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<sub>x</sub> in excess of these limits, 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 control device unless the source or control 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](mailto: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