

2700-FM-AQ0023 Rev. 1/2008 		<b>INSPECTION REPORT</b>		Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program	
Date(s) of Inspection <b>5/17/23</b>	TV <input type="checkbox"/> SM <input type="checkbox"/> NM <input type="checkbox"/>	PA <input type="checkbox"/> GP <input type="checkbox"/> MEGA <input checked="" type="checkbox"/>	Permit #(s): <b>PA-04-00740A, B, C</b>	Expiration Date:	Case #: <b>04-00740</b>
Company Name: <b>Shell Chemical Appalachia LLC</b>			Municipality: <b>Potter Township</b>	County: <b>Beaver</b>	
Plant Name: <b>SHELL CHEM APPALACHIA PETROCHEMICALS COMPLEX</b>			Physical Location: <b>Route 18</b>		Federal ID — Plant Code #: <b>46-1624986-1</b>
Responsible Official: <b>William Watson</b>			Mailing Address: <b>300 Frankfort Road</b>		
Title: <b>General Manager</b>			<b>Monaca, PA 15061-2210</b>		
Phone #(s): <b>724-709-2825</b>					
<b>Mark (X) All Inspection Types That Apply To This Inspection:</b>					
<input type="checkbox"/>	Full Compliance Evaluation (FCE)	<input type="checkbox"/>	Plan Approval Inspection	<input checked="" 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 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 checked="" type="checkbox"/> N/A			Date Received:		
AIMS Report Received: <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A			Date Received:		
<b>Mark (X) All Activities That Apply:</b>					
<input checked="" type="checkbox"/>	File Review	<input type="checkbox"/>	Pre-Inspection Briefing	<input type="checkbox"/>	Exit Interview/Briefing
<input 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
Compliance Status: <input type="checkbox"/> In <input checked="" type="checkbox"/> Out <input type="checkbox"/> Pending <input type="checkbox"/> Awaiting Co. Report <b>Needs a Follow-Up Inspection?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No SIC: 2821 NAICS: 221112					
The Shell Chemical Appalachia LLC ("Shell") Petrochemicals Complex is authorized to operate pursuant to plan approvals PA-04-00740A, PA-04-00740B, and PA-04-00740C.					
On April 5, 2023, I observed intermittent visible emissions were observed from the HP ground flare (Source C205B). I requested that Shell investigate the incident and examine their camera footage to determine if additional visible emissions were observed. Shell reviewed their camera footage and reported on April 13, 2023 visible emissions were observed on April 5, 2023 for a total time of approximately 8 minutes and 52 seconds, periodically between 8:14 and 8:36 AM. Shell reported that Method 22 observations were not performed as required by 40 CFR § 60.18 (f)(1). The Department has identified the following violations from these events:					
Company Representative: <b>MEMO TO FILE</b>		Title: -----	Signature: -----	Date: -----	
DEP Representative: <b>Scott Beaudway</b>		Title: <b>Air Quality Specialist</b>	Signature: <b>Scott Beaudway/SB</b>	Date/Time: <b>5/17/23</b>	
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.					

## **SHELL CHEM APPALACHIA/PETROCHEMICALS COMPLEX, 04-00740**

1. 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% except for a total of five minutes during any consecutive two-hour period. By permitting visible emissions greater than 0% opacity from the HP ground flare (Source C205B) in excess of five minutes on April 5, 2023, Shell caused violations of PA-04-00740C and 25 Pa. Code § 127.25.

2. 40 CFR § 60.18 (c)(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 permitting these visible emissions from the HP ground flare (Source C205B) on April 5, 2023, Shell caused a violation of 40 CFR § 60.18.

3. 40 CFR § 60.18 (f)(1) states Method 22 of appendix A to this part shall be used to determine the compliance of flares with the visible emission provisions of this subpart. The observation period is 2 hours and shall be used according to Method 22. By failing to perform the required Method 22 observations, Shell caused a violation of 40 CFR § 60.18.

### **PADEP Policy Information**

Effective January 16, 2021, all air quality applications, Permits, Requests for Determinations and initial Asbestos Notifications will be subject to new and/or increased fees. The new fees and other PADEP Air Quality information can be found at: <https://www.dep.pa.gov/Business/Air/Pages/default.aspx>

As of July 29, 2021, the Source Testing Section has gone paperless. An individual Source Testing Section reviewer may request a hard copy from the facility or the consultant. Note that the section will continue to require electronic submissions of protocols and reports to the resource email account ([ra-epstacktesting@pa.gov](mailto:ra-epstacktesting@pa.gov)) or by disk and snail mail when the file is over 35 MBs). Periodic Monitoring reports (generally three 20-minute test runs) shall only be submitted to the regional office.

As of November 10, 2021, there have been some changes to how the regional offices will accept electronic submission. OnBase submissions of protocols and reports will no longer be accepted for Source Testing.

SWRO: Any email submission to [ra-epstacktesting@pa.gov](mailto:ra-epstacktesting@pa.gov) should also be CC-ed to [ra-epsstacktesting@pa.gov](mailto:ra-epsstacktesting@pa.gov). Beyond that email cc, no further submission is necessary to DEP SWRO (i.e. no hard copy or disk needed for SWRO).