27	00-FM-AQ0023 Rev. 1/2008 pennsylvania DEPARTMENT OF ENVIRONMENTAL PROTECTION		INSPECTIO	N RE	PORT	Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program					
	te(s) of Inspection: TV PA SM GP SM MEGA]	Permit #(s): PA-04-00740A, B, C	Expiratio	n Date:	Case 04 -	• #: -00740	PF ID #: 775836			
	mpany Name: hell Chemical Appalachia LLC		Municipality: Potter Township			County: Beaver					
Sł	INT NAME: HELL CHEM APPALACHIA ETROCHEMICALS COMPLEX		Physical Location: Route 18			Federal ID — Plant Code #: 46-1624986-1					
W	sponsible Official: 'illiam Watson			Mailing Address: 300 Frankfort Road							
	e: eneral Manager one #(s):			Mona	ca, PA 1506	31-2	210				
	24-709-2825										
M	ark (X) All Inspection Types Th	nat	Apply To This In	spectio	n:						
	Full Compliance Evaluation (FCE)		Plan Approval Inspecti	on			File Review (FR)				
	Operating Permit Inspection (PI)	Operating Permit Inspection (PI)					Complaint Inspection	on (CI)			
\boxtimes	Routine/Partial (RTPT)		Follow-Up Inspection (Ref. Date:)		Sample Collection	(SC)			
	Minor Source(s) Inspection (RFD)		Stack Test Observation	n			Multi-Media Inspec	tion (MM)			
	Other:		Announced								
An	nual Compliance Certification Received:	YE	S □ NO ⊠ N/A		Date Received	l:					
ΑII	MS Report Received:	ΥE	S □ NO ⊠ N/A		Date Received	l:					
M	ark (X) All Activities That Appl	y:									
	File Review		Pre-Inspection Briefing	ı			Exit Interview/Briefi	ng			
	Pre-Inspection Observations		Check For New/Unrepo	orted Sour	rces		Sample(s) Collecte	d			
	Visible Emissions Observations		Verify Operation of CE	MS			Other				
	mpliance Status: ⊠ In ☐ Ou C: 2821 NAICS		Pending A 21112	waiting C	o. Report N	Needs	s a Follow-Up Inspe	ction? 🗌 Yes 🔀 No			
	nspected Monaca, Center Towns orning and did not observe any r	•		•				•			
lo	crossed the Route 376 bridge and cated across the Ohio River at the missions. The weather was clear	ne D	Oock 6 building. I	did not	•	•					
	nspected Vanport and Beaver do alodors.	own	wind of the Shell (Chemic	als facility la	ite n	norning and did	not observe any			
I was on Shell Chemical's property from Noon to 12:40 PM today. I did not observe any visible, fugitive or malodor emissions. I did not observe any track out or fugitive dust from Gate #1.											
	mpany Representative: EMO TO FILE	Title	e: 		Signature:			Date:			
DE	P Representative:	Title	ə:		Signature:			Date/Time:			
S	cott Beaudway	Air	Quality Specialist	t	Scott Beau	dwa	ny/SB	5/16/23			
	s document is official notification that a representation										

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 results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.

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Shell Chemical Appalachia LLC, 04-00740

Significant roadwork is ongoing on Route 18 along the Shell Chemicals facility. I did observe a wet street sweeper in operation on Route 18 today.

I met with Daniel Gallo, Shell Chemicals, and also spoke with Alan Binder, Shell Chemicals, today. We discussed the recent complaints. I suggested that the dust complaint may be from track out from the unpaved employee parking lot. I suggested the use of a street sweeper and water truck to control possible fugitive dust emissions. We discussed the Notices of Violations that I will be issuing shortly (one for malodors observed on 4/12/23, one for VE on 3/5/23 and one for VE on 4/5/23) We also discussed the sample ports for stack testing purposes on the ground enclosed flares (C205A & C205B). Alan Binder stated that the ground enclosed flares (C205A & C205B) do not have sample ports for stack testing purposes. Alan also followed up with an email to that effect. Alan stated that further questions on the issue can be directed to Kim Kaal and himself.

I contacted Shell Chemicals to inform them of my observations and to request the list of operating sources and control devices. Shell Chemicals provided a list of sources and control devices in operation at the time of my observations. Shell Chemicals also submitted records (attached) of an analysis of the gas composition for the material being routed to the flare.

Sources reported to be in operation during my site observation:

302 Liquid Loadout (Recovered Oil) - Not Operating

305 Liquid Loadout (Coke Residue/Tar) - Not Operating

303 Liquid Loadout (Pyrolysis Fuel Oil, Light Gasoline) - Not Operating

304 Liquid Loadout (C3+, Butene, Isopentane, Isobutane, C3+ Ref) - Not Operating

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031 Ethane Cracking Furnace 1 - Not Operating (Pilots Only)
032 Ethane Cracking Furnace 2 - Not Operating (Pilots Only)
033 Ethane Cracking Furnace 3 - Not Operating (Pilots Only)
034 Ethane Cracking Furnace 4 - Not Operating (Pilots Only)
035 Ethane Cracking Furnace 5 - Not Operating (Pilots Only)
036 Ethane Cracking Furnace 6 - Not Operating (Pilots Only)
037 Ethane Cracking Furnace 7 - Not Operating (Pilots Only)
101 Cogen 1 CT+ DB - Operating
102 Cogen 2 CT+ DB - Operating
103 Cogen 3 CT+ DB - 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 - Not Operating
202 Polyethylene Manufacturing Lines - PE1, PE2, PE3 Not Operating
203 Process Cooling Tower - Operating
204 Low Pressure (LP) Header System - Operating LP Incinerator and Multipoint Ground Flare
205 High Pressure (HP) Header System - Operating HP Ground Flare B, Not Operating Ground Flare A and HP Elevated
Flare - Isolated for Maintenance per RFD 10196
206 Spent Caustic Vent Header System - Operating Spent Caustic Vent Incinerator
301 Polyethylene Pellet Material Storage/Handling/Loadout - Not Operating
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Shell Chemical Appalachia LLC, 04-00740

- 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 except the HP Ground Flare A and HP Elevated Flare which are down for maintenance per RFD 10196

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 (<u>raepstacktesting@pa.gov</u> 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 <u>ra-epstacktesting@pa.gov</u> should also be CC-ed to <u>ra-epswstacktesting@pa.gov</u>. Beyond that email cc, no further submission is necessary to DEP SWRO (i.e. no hard copy or disk needed for SWRO).

HP Flare System GC Hourly Average Compositions

	Elemental											
	Hydrogen	Nitrogen	Methane	Ethane	Acetylene	Ethylene	C3	C4	C4 Olefins	C5	C6+	Total
Date and Time	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol
16-May-23 09:00:00	0.02	38.82	58.35	2.71	0.00	0.00	0.08	0.01	0.00	0.00	0.00	100.00
16-May-23 10:00:00	0.03	38.74	58.39	2.75	0.00	0.00	0.08	0.01	0.00	0.00	0.00	100.00
16-May-23 11:00:00	0.03	38.40	58.71	2.76	0.00	0.00	0.09	0.01	0.00	0.00	0.00	100.00
16-May-23 12:00:00	0.03	38.25	58.84	2.74	0.00	0.01	0.12	0.01	0.00	0.00	0.00	100.00
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HP Ground Flare A and HP Elevated Flare are down for maintenance per RFD 10196

LP System Thermal Oxidizer GC Hourly Average Compositions

	Elemental					· · · · · ·	<u> </u>					
	Hydrogen	Nitrogen	Methane	Ethane	Acetylene	Ethylene	C3	C4	C4 Olefins	C5	C6+	Total
Date and Time	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol
16-May-23 09:00:00	0.02	37.30	59.56	2.76	0.00	0.00	0.08	0.01	0.00	0.00	0.25	100
16-May-23 10:00:00	0.02	34.46	62.20	2.97	0.00	0.00	0.08	0.04	0.00	0.00	0.22	100
16-May-23 11:00:00	0.02	37.33	59.37	2.76	0.00	0.01	0.09	0.13	0.00	0.00	0.28	100
16-May-23 12:00:00	0.02	38.42	58.33	2.76	0.00	0.01	0.08	0.09	0.00	0.00	0.29	100

LP System Multipoint Ground Flare PE1/2 Episodic Vent Header

	Elemental											
	Hydrogen	Nitrogen	Methane	Ethane	Acetylene	Ethylene	C3	C4	C4 Olefins	C5	C6+	Total
Date and Time	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol
16-May-23 09:00:00	0.03	25.30	71.25	3.31	0.00	0.00	0.10	0.02	0.00	0.00	0.00	100
16-May-23 10:00:00	0.03	25.51	70.97	3.37	0.00	0.00	0.10	0.02	0.00	0.00	0.00	100
16-May-23 11:00:00	0.03	25.85	70.72	3.27	0.00	0.00	0.10	0.02	0.00	0.00	0.01	100
16-May-23 12:00:00	0.03	25.66	70.85	3.34	0.00	0.00	0.09	0.02	0.00	0.00	0.00	100
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