

INSPECTION REPORT

Commonwealth of Pennsylvania
Department of Environmental Protection
Air Quality Program

Date(s) of Inspection: 6/20/24	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): 04-740	Expiration Date:	Case #: 04-740	PF ID #: 775836
Company Name: Shell Chemical Appalachia LLC		Municipality: Potter Twp		County: Beaver		
Plant Name: Petrochemicals Complex		Physical Location: 300 Frankfurt Rd.		Federal ID - Plant Code #: 46-1624986-1		
Responsible Official: William Watson			Mailing Address: 300 Frankfurt Rd. Monaca PA 15061-2210			
Title: General Manager						
Phone #(s): 724-709						

Mark (X) All Inspection Types That Apply To This Inspection:

<input type="checkbox"/> Full Compliance Evaluation (FCE)	<input type="checkbox"/> Plan Approval Inspection	<input 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 checked="" 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: YES NO N/A Date Received:

AIMS Report Received: YES NO N/A Date Received:

Mark (X) All Activities That Apply:

<input type="checkbox"/> File Review	<input type="checkbox"/> Pre-Inspection Briefing	<input type="checkbox"/> Exit Interview/Briefing
<input checked="" 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

Comments/Recommendations: Enforcement since last FCE Yes No (If yes, attach summary)

I performed a Routine Partial Inspection at Shell Chemical facility in Potter Township today. The weather was partly sunny, dry and 91°F. I did not observe any visible, fugitive or malodors in Monaca Center Township or Potter Township mid-day today. The Department conducted an inspection of the repairs being performed on the Enclosed Ground Flares A and B today.

Compliance Status: In Out Pending Awaiting Co. Report

Needs a Follow-Up Inspection? Yes No

Company Representative: Kimberly Kane	Title: Environmental Mgr.	Signature: <i>[Signature]</i>	Date: 6/20/24
DEP Representative: Scott Beaudry	Title: AQS	Signature: <i>[Signature]</i>	Date/Time: 6/20/24

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.

INSPECTION REPORT

Continued

All of the repair work has been completed on Ground Enclosed Flare A. It resumed operation on 6/19/24 at 0845. Shell chemicals stated that all of the repairs required on the COA have been completed. ~~There are~~ ~~no~~

Six new pilots were also added. We examined the inside of the bottom layer of the old Ground Enclosed Flare A.

We examined the new burner tips that will be installed in Ground Enclosed Flare B. There are approximately ~~210~~ ²⁰⁷ Burner tips per Ground Enclosed Flare

Ground Enclosed Flare B came out of service at 2000 hours on 6/19/24.

We examined the old Ground Enclosed Flare A old Burner tips, which were very obviously damaged. Shell chemicals and PA DEP took photos of the old and new burner tips.

We examined the new floor structure in Ground Enclosed Flare B, prior to its install. It has significantly stronger steel support structure than the previous version.

We toured the entire facility by bus.

I did not observe any visible, fugitive, or malodor emissions while at the Shell facility today.

I did not observe any violation during my inspection today.

Company -- plant name:

Shell Chemicals Appalachia

Initials of representative interviewed:

Date:

6/20/24

Page 2 of 2

Reviewed By _____

 White - Site Yellow - District Office Pink - Regional Office

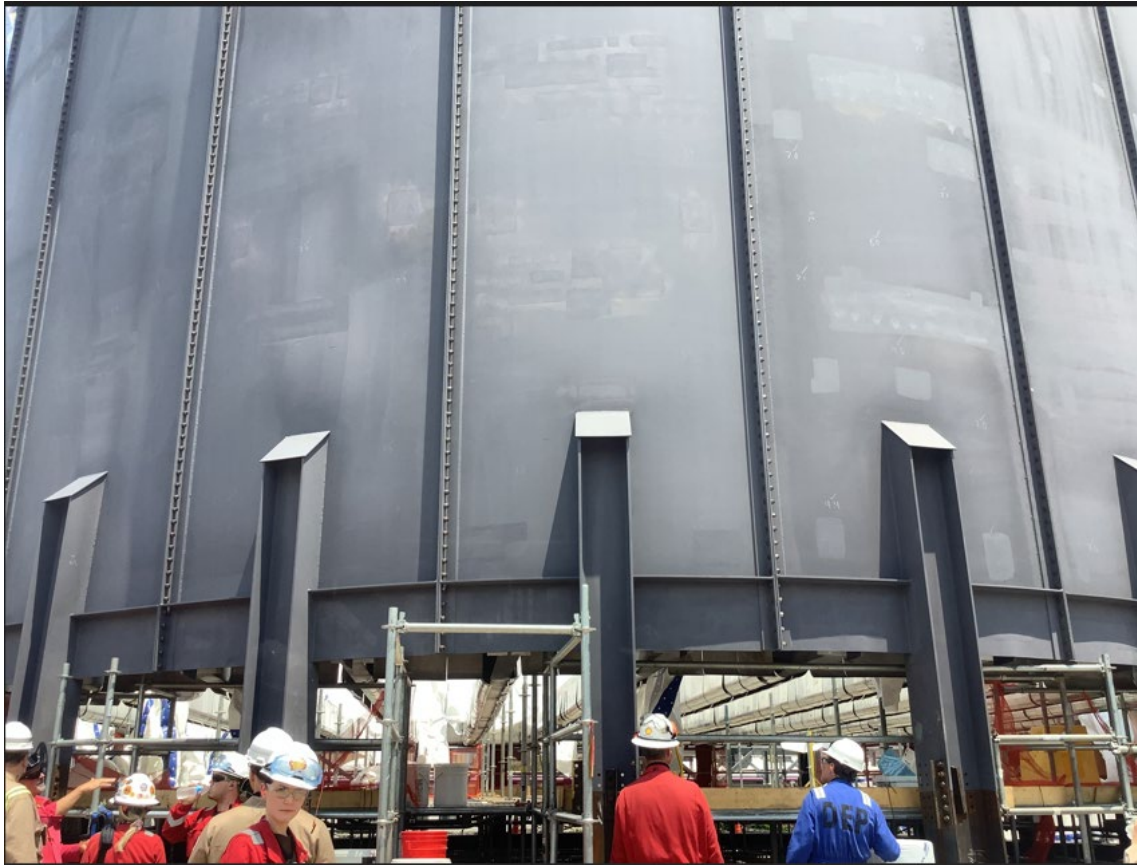
Pictures













Addendum to the 6/20/24 RTPT at Shell Chemicals –

The Shell Chemicals staff in attendance were:

- 1.) Kimberly Kaal
- 2.) Lauren Uffelman
- 3.) John Cimusz
- 4.) Wesley Carambat
- 5.) Chris Dorogy

The PADEP staff in attendance were:

- 1) Scott Beaudway
- 2) Timothy Kuntz
- 3) Bradley Spayd
- 4) Elizabeth Speicher
- 5) Valerie Shaffer
- 6) Alexander Sandy
- 7) Luke Bishop

A request for determination (RFD) was received by DEP on March 28, 2024, for repairs/upgrades on Shell's High Pressure Header System's Totally Enclosed Ground Flares (TEGFs); Source IDs C205A and C205B. DEP determined the repairs to be exempt from plan approval requirements under 25 Pa Code § 127.14(a)(8), and included:

- Upgrades to the burner floor steel, replacement of the damaged burner tips, repair of hot spots on the enclosure (steel shell), installation of ceramic fiber modules on the lower 41 feet of the enclosure (refractory), adjustment of the flare control system programming to include multiple stage ramping, and upgrading the burner hold patterns.

During the RTPT, repairs on TEGF A were complete and repairs to TEGF B were still underway (see attached photos). The following repairs on TEGF B were observed:

- Upgrades to the burner hole pattern on the pilots allowing the burners to operate at higher temperatures,
- New refractory material capable of withstanding higher temperatures than the previous refractory material installed on the lower portion lining the shell,
- Upgrades to the support structure for the burner foundation to stabilize and eliminate the floor sag which had caused the burner placement to be suboptimal, and
- Outer shell replacement to prevent hot spots.