



Shell Chemical Appalachia LLC
300 Frankfort Rd
Monaca, PA 15061

June 15, 2026

Mark Gorog P.E., Regional Manager Air Quality Program
Pennsylvania Department of Environmental Protection (PADEP)
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222

**RE: Shell Chemical Appalachia LLC
Beaver County, PA
6/11/26 Malfunction – Voltage Dip**

Dear Mr. Gorog,

Shell Chemical Appalachia LLC ("Shell") is submitting this notification under 40 CFR 70.6(g)(3)(iv) to notify the permitting authority that emissions limitations were exceeded due to an "emergency" as defined in the regulation for an event initiating on June 11, 2026 and ending on June 12, 2026. Shell is reserving the claim of Affirmative Defense for this incident, and the information required under 40 CFR 70.6(g)(3)(i)-(iii) is provided below. Note, this notice is being submitted to PADEP as the *Permitting authority* (defined under 40 CFR §70.2) with authorization by USEPA under Appendix A to Part 70 to carry out a permit program.

- (i) The situation was an "emergency" as defined by 40 CFR 70.6(g) as the situation arose from a sudden and reasonably unforeseeable event beyond the control of the source and which caused the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency.

At approximately 2:45 PM on June 11, 2026, a voltage dip on the external power grid caused various pieces of equipment at the facility to shutdown. The voltage dip was determined to be due to the severe thunderstorms and lightning in the area. The incident was not caused by improper design, lack of preventative maintenance, operator error, or careless operation. This did not pose an imminent and substantial danger to the public health and safety or the environment.

Exceedances of the 1-hour NOX and CO emissions standards occurred at the ECU furnaces and Cogen. These exceedances will be explicitly addressed in the forthcoming malfunction report to be submitted to the agency.

- (ii) The facility was being properly operated at the time of the incident.
- (iii) During the period of the emergency, the facility took all reasonable steps to minimize the level of emissions that exceeded the emission standards, or other requirements in the permit.

During the event, operations followed applicable policies and procedures to minimize emissions and regain normal operating conditions. Compliance with each separate

June 15, 2026

exceedance of the CEMS emissions standards was restored within the hour. The specific root causes and corrective actions for each CEMS exceedance will be addressed in the forthcoming malfunction report to be submitted to the agency.

If you have any questions regarding this matter, please do not hesitate to contact Laura Sabolyk (Laura.L.Sabolyk@shell.com).

Sincerely,

A handwritten signature in dark ink, appearing to read 'Nathan Levin', with a long horizontal flourish extending to the right.

Nathan Levin
Operations Manager

CC:
Scott Beaudway, Air Quality Specialist