

August 19, 2024

**NOTICE OF VIOLATION**

**VIA EMAIL: Kimberly.Kaal@shell.com**

Kimberly Kaal, Environmental Manager  
Shell Chemical Appalachia LLC  
300 Frankfort Road  
Monaca, PA 15061

Re: PA-04-00740C  
Visible Emissions  
Shell Petrochemicals Complex  
Potter Township  
Beaver County

Dear Kimberly Kaal:

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. Shell reported to the Department that visible emissions were observed from several sources on several dates since February of 2024. Please see Table 1 below. The Department has identified the following violations from these events:

1. PA-04-00740C, Section D, Source 204, Condition #001, states visible emissions from both the LP Incinerator and MPGF shall not exceed 0% opacity except for a total of five minutes during any consecutive two-hour period. By permitting visible emissions greater than 0% opacity from the MPGF (Source C204B) in excess of five minutes, Shell caused violations of PA-04-00740C and 25 Pa. Code § 127.25.
2. 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% opacity except for a total of five minutes during any consecutive two-hour period. By permitting visible emissions greater than 0% opacity from the both the HP ground flares (Sources C205A and C205B) in excess of five minutes, Shell caused violations of PA-04-00740C and 25 Pa. Code § 127.25.

3. 40 CFR § 60.18 (b)(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 flares (Sources C205A, C205B and C204B), Shell caused a violation of 40 CFR § 60.18.

Table 1: Shell Chemical Malfunctions

Malfunction Date	Malfunction Report Date	Source Involved	Visible Emission Duration
2/21/24 - 2/22/24	3/21/24	C204B	3 hours 34 minutes and 43 seconds
5/8/24	5/30/24	C205A	7 minutes and 30 seconds
6/17/24	7/11/24	C205B	9 minutes and 41 seconds
7/10/24	8/8/24	C205A	8 minutes and 55 seconds
7/10/24	8/8/24	C205B	6 minutes and 41 seconds

25 Pa. Code § 127.25 states in part that a person may not cause or permit the operation of a source unless the source 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

Scott Beaudway  
Air Quality Specialist  
Air Quality

cc: E. Speicher, Environmental Group Manager  
V. Shaffer, Air Quality District Supervisor  
Central Office (via email)  
04-00740 Enforcement File