

April 21, 2025

**NOTICE OF VIOLATION**

**VIA EMAIL: Nathan.Levin@shell.com**

Nathan Levin, General Manager  
Shell Chemical Appalachia, LLC  
300 Frankfort Road  
Monaca, PA 15061

Re: PA-04-00740C  
Combustion Turbine/Duct Burner Units  
Shell Polymers Monaca  
Potter Township, Beaver County, Pennsylvania

Dear Nathan Levin:

Shell Polymers Monaca (Shell) is authorized to operate pursuant to plan approval PA-04-00740C. On April 10, 2025, Shell reported to the Department NOx emissions from the Combustion Turbines with Duct Burners (Sources 101 and 102) which exceeded plan approval limits on March 17, 2025. See Table 1 below.

Table 1: Cogeneration NOx Emissions

Malfunction Date	Cogen	Time	Limit (ppmvd)	Exceedance (ppmvd)
3/17/25	101	2200-2300	2 ppmvd	2.01-8.74
3/17/25	102	2200-2300	2 ppmvd	2.8-9.36

The Department has identified the following violations from these events:

PA-04-00740C, Section E, Source G02, Condition #001, NOx emissions from the Combustion Turbines with Duct Burners shall not exceed the following:  
2 ppmvd @ 15% O2 from each turbine/duct burner on a 1-hour average, excluding periods of defined startup or shutdown. By emitting NOx in excess of this limit, Shell caused violations of PA-04-00740C and 25 Pa. Code § 127.25.

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

Air Quality Specialist

cc: S. Wiedemer, Environmental Group Manager  
O. Law, Air Quality Compliance Specialist  
Central Office (via email)  
04-00740 Enforcement File