

April 28, 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
HP Elevated Flare
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 23, 2025, Shell reported to the Department visible emissions from the HP (High Pressure) Elevated Flare (Source C205C) on March 28, 2025. Shell reported 27 minutes and 19 seconds of intermittent visible emissions observed between 9:22:23 and 10:00:12 on March 28, 2025. Shell reported that the cumulative emissions exceeded 5 minutes in a consecutive 2-hour period.

The Department has identified the following violations from this event:

1. 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% except for a total of five minutes during any consecutive two-hour period. By permitting visible emissions greater than 0% opacity from the HP elevated flare (Source C205C) in excess of five minutes on March 28, 2025, Shell caused violations of PA-04-00740C and 25 Pa. Code § 127.25.
2. 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 HP elevated flare (Source C205C) on March 28, 2025, Shell caused a violation of 40 CFR § 60.18.

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 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