

June 25, 2025

VIA EMAIL: Nathan.Levin@shell.com

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

Re: PA-04-00740C
Source IDs: [101, 102, 103, 204, 206] stack testing
Shell Polymers Monaca
Potter Township
Beaver County
Pennsylvania

Dear Nathan Levin:

The Shell Chemical Appalachia LLC (“Shell”) Petrochemicals Complex is authorized to operate pursuant to plan approval PA-04-00740C. The Department of Environmental Protection (DEP) has reviewed stack testing results for tests on various air contamination sources at the facility performed on several dates in 2022 and 2024. The stack test reports show the following violations:

1. PA-04-00740C, Section D, Source ID 204, Condition # 002 states that emissions from the LP incinerator shall not exceed 0.0075 lb/MMBtu for PM10 and PM2.5. Testing by Shell on May 21, 2024 exceeded this emission limit in violation of 25 Pa. Code § 127.12b.
2. PA-04-00740C, Section D, Source ID 206, Condition # 001 states that emissions from the Spent Caustic Vent Incinerator shall not exceed 0.0075 lb/MMBtu for PM10 and PM2.5 and 0.068 lb/MMBtu for NOx. Testing by Shell on May 23, 2024 exceeded these emission limits in violation of 25 Pa. Code § 127.12b.

PA-04-00740C, Section E, Condition #011 states the “Owner/Operator shall perform HCHO (formaldehyde), Benzene, and Toluene emission testing upon each of the three combustion turbines ... [i]initial performance testing is required within 180 days of startup of the turbines....” Shell performed the testing for the above pollutants within the Department granted extension period. However, results of these tests were unacceptable for the following sources for specific pollutants shown below:

Source	Test Date	Parameters	Test Results
101	1/28/2022	Formaldehyde Toluene Benzene	Unacceptable
102	1/21/2022	Formaldehyde Toluene Benzene	Unacceptable
103	1/26/2022	Formaldehyde Toluene Benzene	Unacceptable

By not conducting compliant testing within the extended testing period, for the parameters at Sources 101, 102, and 103, as shown in the above table, Shell violated 25 Pa. Code § 127.12b

The above listed violations constitute unlawful conduct and a public nuisance pursuant to Sections 8 and 13 of the Air Pollution Control Act (APCA), 35 P.S. Sections 4008 and 4013, respectively. Violations of 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 tkuntz@pa.gov or at 412.442.4213.

Sincerely,

Tim Kuntz/TK

Tim Kuntz
Air Quality Compliance Specialist
Air Quality Program

cc: M. Gorog, Program Manager
S. Wiedemer, Group Manager
O. Law, Compliance Specialist
S. Beaudway, Air Quality Specialist
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