2700-FM-AQ0023 Rev. 1/2008 pennsylvania department of environmental protection	INSPECTIC	INSPECTION REPORT				Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program			
Date(s) of Inspection: TV PA PA<	☐ Permit #(s): ☐ PA-04-00740A, B, C ⊠			Case 04-	#: 00740	PF ID #: 775836			
Company Name: Shell Chemical Appalachia LLC	Municipality: Potter Township	County: Beaver							
Plant Name: SHELL CHEM APPALACHIA /PETROCHEMICALS COMPLEX	Physical Location: Route 18			Federal ID — Plant Code #: 46-1624986-1					
Responsible Official: William Watson		Mailing A 300 Fr	^{ddress:} ankfort Ro	ad					
Title: General Manager		Monac	ca, PA 1506	61-2	210				
Phone #(s): 724-709-2825									
Mark (X) All Inspection Types Th	hat Apply To This In	spectio	n:						
Full Compliance Evaluation (FCE)	Plan Approval Inspect	ion			File Review (FR)				
Operating Permit Inspection (PI)	Initial Permit Inspectio	n (IPI)		\boxtimes	Complaint Inspection	on (CI)			
Routine/Partial (RTPT)	Follow-Up Inspection	(Ref. Date:)		Sample Collection	(SC)			
Minor Source(s) Inspection (RFD)	Stack Test Observation	n			Multi-Media Inspec	tion (MM)			
Other:	Announced								
Annual Compliance Certification Received:	YES 🗌 NO 🖾 N/A		Date Received	l:					
AIMS Report Received:	YES 🗌 NO 🗌 N/A		Date Received	l:					
Mark (X) All Activities That Appl	ly:								
File Review	Pre-Inspection Briefing	g			Exit Interview/Brief	ing			
Pre-Inspection Observations	Check For New/Unrep	orted Sour	ces		Sample(s) Collected				
Visible Emissions Observations	Verify Operation of CE	of CEMS			Other				
SIC: 2821 NAICS I inspected Industry, Vanport and I I observed the Shell Chemicals fac	S: 221112 Beaver this morning a cility today from 9:20	AM to 1	not observe 1:20 AM. T	any was	located across	the Ohio River			
by the Dock 6 building. I did not o steam from the Elevated Flare and									
I inspected Monaca, Center Towns	ship and Potter Town	ship this	morning ar	nd d	id not observe	any malodors.			
Company Representative: MEMO TO FILE	Title:		Signature:			Date:			
DEP Representative:	Title:		Signature:			Date/Time:			
Scott Beaudway	Air Quality Specialis	t	Scott Beau	dwa	y/SB	1/5/24			
This document is official notification that a representa inspection are shown above and on any attached pag- results or from any additional review of Department re	es, and may include violations un	covered durin	ng the inspection.	Violati					

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Shell Chemical Appalachia LLC, 04-00740

I contacted Shell Chemicals to inform them of my observations and to request the list of operating sources and control devices. Shell Chemicals provided a list of sources and control devices in operation at the time of my observations. Shell Chemicals also submitted records (attached) of an analysis of the gas composition for the material being routed to the flare.

Sources reported to be in operation during my site observation:

01/05/2024 9:20 AM to 11:20 AM Source and Controls Status

031 Ethane Cracking Furnace 1 – Operating 032 Ethane Cracking Furnace 2 – Operating 033 Ethane Cracking Furnace 3 – Operating (Decoking) 034 Ethane Cracking Furnace 4 – Operating 035 Ethane Cracking Furnace 5 – Operating 036 Ethane Cracking Furnace 6 – Operating 037 Ethane Cracking Furnace 7 – Not Operating (No Pilots) 101 Cogen 1 CT + DB – Operating 102 Cogen 2 CT+ DB – Operating 103 Cogen 3 CT+ DB – CT Operating, Duct Burners not Operating 104 Cogeneration Plant Cooling Tower - Operating 105 Diesel-Fired Emergency Generator Engines - Standby 106 Fire Pump Engines - Standby 107 Natural Gas Fired Emergency Generator Engines - Standby 201 Ethylene Manufacturing Line – Operating 202 Polyethylene Manufacturing Lines -PE1 Operating PE2 Operating PE3 Not Operating 203 Process Cooling Tower - Operating 204 Low Pressure (LP) Header System – Operating LP Incinerator and Operating Multipoint Ground Flare 205 High Pressure (HP) Header System - Operating HP Ground Flare A and B, HP Elevated Flare on Standby 206 Spent Caustic Vent Header System – Operating Spent Caustic Vent Incinerator 301 Polyethylene Pellet Material Storage/Handling/Loadout - Operating 302 Liquid Loadout (Recovered Oil) - Not Operating 303 Liquid Loadout (Pyrolysis Fuel Oil, Light Gasoline) - Not Operating 304 Liquid Loadout (C3+, Butene, Isopentane, Isobutane, C3+ Ref) – Operating 305 Liquid Loadout (Coke Residue/Tar) – Not Operating 401 Storage Tanks (Recovered Oil, Equalization Wastewater) - Operating 402 Storage Tank (Spent Caustic) - Operating 403 Storage Tanks (Light Gasoline) - Operating 404 Storage Tanks (Hexene) - Operating 405 Storage Tanks (Misc Pressurized/Refrigerated) - Operating 406 Storage Tanks (Diesel Fuel > 150 Gallons) - Operating 407 Storage Tanks (Pyrolysis Fuel Oil) - Operating 408 Storage Tanks (Diesel Fuel < 150 Gallons) - Operating 409 Methanol Storage Vessels and Associated Components -Operating

Shell Chemical Appalachia LLC, 04-00740

502 Wastewater Treatment Plant - Operating 503 Plant Roadways - In Use

All Listed Controls Operating

PADEP Policy Information

DEP is now accepting permit and authorization applications, as well as other documents and correspondence, electronically through the OnBase Electronic Forms Upload tool. Please use the link below to view the webpage, get instructions, and submit documents: <u>https://www.dep.pa.gov/DataandTools/Pages/Application-Form-Upload.aspx</u>

Effective January 16, 2021, all air quality applications, Permits, Requests for Determinations and initial Asbestos Notifications will be subject to new and/or increased fees. The new fees and other PADEP Air Quality information can be found at: <u>https://www.dep.pa.gov/Business/Air/Pages/default.aspx</u>

As of July 29, 2021, the Source Testing Section has gone paperless. An individual Source Testing Section reviewer may request a hard copy from the facility or the consultant. Note that the section will continue to require electronic submissions of protocols and reports to the resource email account (<u>ra-epstacktesting@pa.gov</u> or by disk and snail mail when the file is over 35 MBs). Periodic Monitoring reports (generally three 20-minute test runs) shall only be submitted to the regional office.

As of November 10, 2021, there have been some changes to how the regional offices will accept electronic submission. OnBase submissions of protocols and reports will no longer be accepted for Source Testing.

SWRO: Any email submission to <u>ra-epstacktesting@pa.gov</u> should also be CC-ed to <u>ra-epswstacktesting@pa.gov</u>. Beyond that email cc, no further submission is necessary to DEP SWRO (i.e. no hard copy or disk needed for SWRO).

Shell Polymers HP Flare System GC Hourly Average Compositions*

	Elemental											
	Hydrogen	Nitrogen	Methane	Ethane	Acetylene	Ethylene	C3	C4	C4 Olefins	C5	C6+	Total
Date and Time	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol
05-Jan-24 09:00:00	0.90	28.45	62.16	3.75	0.00	3.14	0.54	0.03	0.14	0.82	0.08	100.00
05-Jan-24 10:00:00	0.90	26.01	64.61	3.87	0.00	3.29	0.29	0.02	0.07	0.85	0.10	100.00
05-Jan-24 11:00:00	1.02	23.22	67.08	4.07	0.00	3.47	0.09	0.01	0.02	0.92	0.10	100.00

Shell Polymers LP System Thermal Oxidizer GC Hourly Average Compositions*

	Elemental											
	Hydrogen	Nitrogen	Methane	Ethane	Acetylene	Ethylene	C3	C4	C4 Olefins	C5	C6+	Total
Date and Time	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol
05-Jan-24 09:00:00	1.65	76.79	15.26	1.17	0.00	3.21	0.01	0.02	0.75	1.08	0.05	100.00
05-Jan-24 10:00:00	1.65	76.95	15.11	1.13	0.00	3.21	0.01	0.02	0.78	1.08	0.05	100.00
05-Jan-24 11:00:00	1.51	77.94	14.10	1.06	0.00	2.93	0.01	0.02	1.36	1.01	0.06	100.00

Shell Polymers LP System Multipoint Ground Flare PE1/2 Episodic Vent Header*

	Elemental											
	Hydrogen	Nitrogen	Methane	Ethane	Acetylene	Ethylene	C3	C4	C4 Olefins	C5	C6+	Total
Date and Time	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol
05-Jan-24 09:00:00	0.04	5.98	88.70	5.19	0.00	0.00	0.08	0.01	0.00	0.00	0.00	100.00
05-Jan-24 10:00:00	0.04	5.95	88.83	5.10	0.00	0.00	0.08	0.01	0.00	0.00	0.00	100.00
05-Jan-24 11:00:00	0.04	5.93	88.83	5.12	0.00	0.00	0.08	0.01	0.00	0.00	0.00	100.00

* All data still subject to final QC for purposes of emissions inventory calculations and submittals