

NOTICE OF VIOLATION

August 31, 2022

VIA EMAIL: Kimberly.Kaal@shell.com

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

Re: PA-04-00740C
Shell Chemical Appalachia LLC
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. On July 15, 2022, Shell reported to the Department that on July 4, 2022, visible emissions emanated from the spent caustic vent thermal oxidizer (“SCTO”). Shell provided additional information regarding this event in a follow-up report on August 17, 2022, which stated that the cause of the visible emissions from the SCTO was “infiltration of vent gas from the [High Pressure] flare knock out drum into the [recovered oil] tank.” The August 17 report further stated that the “[flow equalization and oil removal] tanks and [recovered oil] tank vent blower routed too much hydrocarbon vapor to the SCTO,” and “the [High Pressure] Flare [Knock Out] Drum was empty of liquid allowing for hydrocarbon vapors to migrate to and infiltrate the [recovered oil] Tank.” Emissions estimates provided by Shell in the August 17 report show 2.23 tons of VOC (among other pollutants) were released to atmosphere as a result of these conditions between July 4 and 20, 2022. The August 17 report details corrective actions implemented by Shell since discovery of these conditions, and the Department understands that as of July 20, 2022, there is no longer infiltration of hydrocarbons to the recovered oil tank.

Section B Condition #013 of PA-04-00740C incorporates the requirements of 25 Pa. Code § 127.25 and states:

A person may not cause or permit the operation of a source subject to § 127.11 (relating to plan approval requirements), unless the source and air cleaning devices identified in the application for the plan approval and the plan approval issued to the source, are operated and maintained in accordance with specifications in the application and

conditions in the plan approval issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.

By operating the SCTO and associated equipment in a manner inconsistent with good operating practices, Shell violated 25 Pa. Code § 127.25 and conditions of PA-04-00740C.

The above violation(s) 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. 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 ahensel@pa.gov or at 412.442.4107.

Sincerely,

Anna Hensel / AH / 8/31/2022

Anna Hensel
District Supervisor
Air Quality

cc: M. Gorog, Program Manager
E. Speicher, Environmental Group Manager
Central Office
04-00740 Enforcement File