



Shell Chemical Appalachia LLC
300 Frankfort Rd
Monaca, PA 15061

May 18, 2023

BY ELECTRONIC MAIL

Mark Gorog P.E., Regional Manager Air Quality Program
Pennsylvania Department of Environmental Protection
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222

RE: March 2023 Monthly Resubmittal of Information

Dear Mark:

Shell Chemical Appalachia LLC (Shell), located in Beaver County, Pennsylvania is submitting this monthly information request per the Pennsylvania Department of Environmental Protection's (PADEP) request.

As requested, the data associated with this submittal includes current 12-month emission data for each source and permitted pollutant per Plan Approval PA-04-00740C for the period through end of March, 2023. Please note that per PADEP's recent request, Shell reverted back to the 98/99 percent destruction efficiency (dependent on carbon composition from GC data) as referenced in the permit and prior protocol. Specifically, for Source ID 204, Section D. I. pertaining to the Low Pressure Header System, Condition # 004 requires that the MPGFs demonstrate a destruction efficiency of 98 percent, and similarly for Source ID 205, Section D. I. pertaining to the HP Ground Flare, Condition #001 requires a destruction efficiency of 98 percent.

As you know, SPM has conducted further diagnostic testing of the flares both at its facility in January 2023 and at Zeeco's facility in May 2023 and contends that destruction efficiency of the flares is above 99.5%. However, for purposes of the current COA discussions and for any penalties calculated thereunder, we understand that the lower destruction efficiency will be used and make this submission for that purpose. We hope to revisit the diagnostic testing and destruction efficiency of our flares in the future.

If you have any questions or comments concerning the information included in this letter or the attached documentation, please feel free to contact me at kimberly.kaal@shell.com, or (724) 709-2467.

Sincerely,

Kimberly J. Kaal

Kimberly Kaal
Environmental Manager, Attorney in Fact

CC: Jim Miller, Regional Director
Elizabeth Speicher, Environmental Group Manager
Scott Beaudway, Air Quality Specialist