


2700-FM-AQ0023 Rev. 1/2008		INSPECTION REPORT		Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program		
						
Date(s) of Inspection: 8/31/2022	TV <input type="checkbox"/> SM <input type="checkbox"/> NM <input type="checkbox"/>	PA <input checked="" type="checkbox"/> GP <input type="checkbox"/> MEGA <input checked="" type="checkbox"/>	Permit #(s): PA-04-00740A, B, & C	Expiration Date:	Case #: 04-00740	PF ID #: 775836
Company Name: Shell Chemical Appalachia LLC		Municipality: Potter Twp		County: Beaver		
Plant Name: Petrochemicals Complex		Physical Location: 300 Frankfort Rd		Federal ID — Plant Code #: 46-1624986-1		
Responsible Official: William Watson			Mailing Address: 300 Frankfort Rd			
Title: General Mgr			Monaca, PA 15061			
Phone #(s): 724-709-2825						
Mark (X) All Inspection Types That Apply To This Inspection:						
<input type="checkbox"/>	Full Compliance Evaluation (FCE)	<input type="checkbox"/>	Plan Approval Inspection	<input checked="" type="checkbox"/>	File Review (FR)	
<input type="checkbox"/>	Operating Permit Inspection (PI)	<input type="checkbox"/>	Initial Permit Inspection (IPI)	<input type="checkbox"/>	Complaint Inspection (CI)	
<input type="checkbox"/>	Routine/Partial (RTPT)	<input type="checkbox"/>	Follow-Up Inspection (Ref. Date: _____)	<input type="checkbox"/>	Sample Collection (SC)	
<input type="checkbox"/>	Minor Source(s) Inspection (RFD)	<input type="checkbox"/>	Stack Test Observation	<input type="checkbox"/>	Multi-Media Inspection (MM)	
<input type="checkbox"/>	Other:	<input type="checkbox"/>	Announced			
Annual Compliance Certification Received: <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A				Date Received:		
AIMS Report Received: <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A				Date Received:		
Mark (X) All Activities That Apply:						
<input checked="" type="checkbox"/>	File Review	<input type="checkbox"/>	Pre-Inspection Briefing	<input type="checkbox"/>	Exit Interview/Briefing	
<input type="checkbox"/>	Pre-Inspection Observations	<input type="checkbox"/>	Check For New/Unreported Sources	<input type="checkbox"/>	Sample(s) Collected	
<input type="checkbox"/>	Visible Emissions Observations	<input type="checkbox"/>	Verify Operation of CEMS	<input type="checkbox"/>	Other	
Comments/Recommendations: Enforcement since last FCE <input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach summary) 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 any infiltration of hydrocarbons to the recovered oil tank.						
Compliance Status: <input type="checkbox"/> In <input checked="" type="checkbox"/> Out <input type="checkbox"/> Pending <input type="checkbox"/> Awaiting Co. Report				Needs a Follow-Up Inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Company Representative: <memo to file>		Title:		Signature:		Date:
DEP Representative: Anna Hensel		Title: District Supervisor		Signature: Anna Hensel/AH/9/6/2022		Date/Time: 9/6/2022
This document is official notification that a representative of the Department of Environmental Protection, Air Quality Program, inspected the identified site. The findings of this inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.						

eFacts Inspection ID# 3417530 Date: 9/6/2022 Reviewed By _____

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The visible emissions from the SCTO were initially reported to the Department via phone call on 7/4/2022, the same day as the observation of these visible emissions. The Department requested a full written malfunction report via email on 7/8/2022. The Notice of Violation for the 7/4 event stated that “On July 15, 2022, Shell reported to the Department that on July 4, 2022 [...],” because 7/15 was the date of the initial written malfunction report, although the event had been verbally reported to the Department prior to 7/15. The visible emissions that occurred on 7/4/2022 did not exceed 5 minutes of visible emissions within a consecutive 2-hour period.

On 7/19/2022, the Department held a call with representatives from Shell to discuss two visible emissions events that had occurred at the facility on 6/23 and 7/4, respectively. During that call, Shell explained in greater detail the facts surrounding the 6/23 event, during which approx. 11 min of visible emissions emanated from the multipoint ground flare (MPFG, Source ID C204B). A Notice of Violation was sent for the 6/23 event on 7/21/2022. During the 7/19 call, Shell explained that although an initial malfunction report was submitted on 7/15/2022 for the 7/4/2022 event, a root cause analysis investigation was ongoing and that an updated and more detailed report would be submitted once more information was made available.

On 8/16/2022, the Department held a call (at Shell’s request) with representatives from Shell to discuss the 7/4 visible emissions event. During that call, Shell explained that it would be submitting a 10-page malfunction report regarding the 7/4 event. This call served to verbally walk through the explanation provided in the malfunction report. During the call, Michael Burke (Shell Production Manager) explained that hydrocarbons were no longer infiltrating the system due to the closure of a block valve. Mr. Burke explained that although this solution would work temporarily, a longer-term fix would be necessary, and that Shell was still developing the longer-term solution. Following the 8/16 call and subsequent review of the malfunction report (received on 8/17), a Notice of Violation was sent on 8/31/2022 for the 7/4/2022 event.

--End of Report--

 Company -- plant name:
Shell

Initials of representative interviewed:

Date:

Reviewed By _____