



NOTICE OF VIOLATION

September 5, 2024

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 Petrochemicals Complex
 12-month Rolling Emission Exceedances (February thru July 2024)
 Potter Township
 Beaver County

Dear Kimberly Kaal:

The Shell Chemical Appalachia LLC (“Shell”) Petrochemicals Complex (“Facility”) is authorized to be constructed and for temporary operation pursuant to plan approvals PA-04-00740A, PA-04-00740B, and PA-04-00740C. Shell provided emissions data, including 12-month rolling totals for the periods ending in February 2024 thru July 2024. Following review of this data, the Department of Environmental Protection (DEP) has noted the following violations:

Section C, Condition #005 of PA-04-00740C imposes 12-month rolling total emission limitations of 328.5 tons of Nitrogen Oxides (NOx). The 12-month rolling emissions data provided by Shell shows that for the 12-month period ending in February 2024 thru to July 2024 exceeded the plan approval limits (see Table 1).

Table 1: Shell Monthly Emissions for NOx (Year 2024)

Month	Report Date	NOx Reported (tons)	NOx PA-04-00740C Limit (tons)
February	March 18	367.5	328.5
March	April 16	368.0	328.5
April	May 13	370.3	328.5
May	June 13	375.1	328.5
June	July 9	371.7	328.5
July	August 13	367.3	328.5

Shell violated Section C, Condition #005 of PA-04-00740C and 25 Pa. Code § 127.25. Each 12-month period with total emissions in excess of the applicable limitation for NOx set forth in Section C, Condition #005 constitutes a separate violation.

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 tkuntz@pa.gov or at 412-442-4213.

Sincerely,

Tim Kuntz/TK

Air Quality District Supervisor
Air Quality Program

cc: E. Speicher - Group Manager
V. Shaffer - District Supervisor
SW OCC - M. Heilman
SW ARD – K. Halloran
Central Office (via email)
04-00740 Enforcement File