



Pennsylvania
**Department of
Environmental Protection**

SOUTHWEST REGIONAL OFFICE

September 16, 2024

VIA EMAIL: Kimberly.Kaal@shell.com

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

Re: Initial Response and Request for Additional Information
Shell Confidentiality Request dated June 22, 2024
Shell Chemical Appalachia LLC, Shell Polymers Monaca Site
Plan Approvals PA-04-00740A, PA-04-00740B, and PA-04-00740C
Potter and Center Townships, Beaver County

Dear Kimberly Kaal:

I write on behalf of the Department of Environmental Protection in response to your letter dated June 22, 2024 requesting that flare vent gas composition data from inline gas chromatographs be treated as confidential business information (CBI) under Section 13.2 of the Air Pollution Control Act. Although your letter identified certain categories of information that Shell asserts is CBI, the letter did not include any specific data or other information that Shell is requesting to be treated as CBI. Any person requesting confidential treatment of information submitted to the Department must submit a written request specifically designating which items of data or other information the person wishes the Department to treat confidentially, along with a justification for why the information warrants confidential treatment under section 13.2 of the Act.

In order to request confidential treatment for information in any document, you must submit a redacted version of the relevant document with the confidential information blacked out (and thus suitable for public disclosure), along with a letter of request containing a table identifying the page and line number of each redaction, along with a justification for each redacted item as to why it should be treated as confidential under the specific criteria identified in section 13.2 of the Act. A template is provided with this letter.

Please respond to this request for additional information within five (5) business days of your receipt of this letter. The Department's final decision on each request will be sent to you in writing, along with a notice of any appeal rights in the event the request is denied. Please be aware that if you do not timely provide adequate justification for confidential treatment under section 13.2 of the Act, your request for confidential treatment may be denied and the records may be subject to public disclosure.

Please also note that certain records for which Shell has requested confidential treatment through Shell's June 22 letter are responsive to request for disclosure of records submitted to the Department by Sarah Kula of Environmental Integrity Project, dated August 5, 2024. The Department intends to treat these records as confidential pending the receipt and review of additional justification requested via this letter.

If you have any questions, please call me at 412-442-4174.

Sincerely,

Sheri L. Guerrieri/slg
NSR Chief
Air Quality Program

Cc: File: PA-04-00740C
Operations (E. Speicher)
Brian Greenert (OCC)

Example Confidential Information Log

Page # in Document	Description	Basis for Confidential Treatment as Identified in the Pennsylvania Air Pollution Control Act, 35 P.S. § 4013.