

Shell Chemical Appalachia LLC 4301 Dutch Ridge Road Beaver, PA 15009

January 22, 2020

Mr. Ryan Decker Clean Water Program PA Department of Environmental Protection Southwest Regional Office 400 Waterfront Drive Pittsburgh, PA 15222

RE: Cooling Water Intake Structure Follow-up

NPDES Permit Number PA0002208 A-2

Shell Chemical Appalachia LLC Beaver County, Pennsylvania

Dear Mr. Decker:

This letter provides the requested additional information concerning the changes that are being made to the cooling water intake structure (CWIS). The following are enclosed:

- Table 1 which provides side by side comparison of existing CWIS and what is being done to bring it up to usable/current standards.
- Attachment 1 Page 65286 from Federal Register (Vol. 66, No. 243 / Tuesday, December 18, 2001) the Preamble for National Pollutant Discharge Elimination System: Regulations Addressing Cooling Water Intake Structures for New Facilities.

The highlighted text is where EPA utilized "newly constructed" and "modified" in same sentence and in our reading illustrates EPA clear intent that the only modification that could cause an existing source to be subject to this rule is an increase in capacity.

- Attachment 2 Drawings for Existing CWIS
- Attachment 3 Drawings and Photo Log for Refurbishing the CWIS

Hopefully this information provides what you need for your evaluation

Sincerely

H. James Sewell

CSU Environmental Manager

Shell Chemical Appalachia LLC

Enclosures -

Table 1
Cooling Water Intake Structure Comparison

	Existing	Change
1. Foundation	Concrete	Concrete – same existing structure, same exact footprint, some patching of cracks/existing concrete due to deterioration / age
2. Structure over Intake	Cinder block building	Existing cinder block building replaced with steel building
3. Sluice Gate	Cast iron	Opening reused existing, sluice gate replaced
4. Design Flow	80 MGD	21 MGD
5. In take Pumps	4 pumps	3 Gould pumps rated at 0.44 MG/hr (2 operating one redundant)
6. Trash Bar Screens -Opening (in)	2.0 inches	1.5 inches
7. Traveling Screens		
Screen Type	Two (2) Link Belt Model 45 Traveling Screens	Two (2) 24" pitch dual flow traveling water screens with wing walls, 4' basket width x 43" centers
Screen Dimensions	9'2" wide by 5'5" deep	8'2" wide by 5'5" deep
Through Screen Velocity (ft/sec)	1.36 @ Normal Pool-12' depth	0.38 @ Normal Pool-12' depth
Screen Opening	Hot Dip Galvanized Wire Screen, 0.105" dia. wire with 0.395" square openings	Screen cloth – 316 SSTL 0.072" dia. wire with 0.25" square openings
8. Stop Log	Unknown	Two (2) new stop logs in existing track 20' height, 3 sections
9. Screen Cleaning System	Two (2) 225 gpm water pumps	Two (2) new 102 gpm water pumps
10. Safety/Electrical/Monitor Features	Unknown	Change to current Code/Shell Standards

Attachment 1

Page 65286 from Federal Register Preamble for Regulations Addressing Cooling Water Intake Structures for New Facilities

modified CWIS). Thus, the Agency believes the language of the regulation does make it clear that the rule applies to greenfield and stand-alone facilities or those whose processes are substantially independent of an existing facility at the same site. As commenters requested, EPA has added some examples to the regulatory section of the rule to serve as guidance regarding the definition of new facility under this final rule.

Several commenters also questioned whether repowering an existing facility would trigger applicability of the new facility requirements. These commenters pointed out that repowering is a common practice that often results in a gain in efficiency (i.e., both increased power output and a reduced need for cooling water withdrawals). Commenters expressed concern that, although repowering an existing facility is distinct from building a greenfield or stand-alone facility, repowering could be interpreted as subject to the new source definition and thereby subject to the new facility rule. Some also asserted that the proposed rule included an arbitrary distinction between completely replacing an existing facility and repowering that facility. By defining the complete replacement of a facility as a new facility but allowing repowering to be defined as an existing facility, these commenters argued, the proposed rule creates an incentive to use less efficient technology for the redevelopment of older sites. Commenters also noted that the proposed rule would regulate a new, greenfield facility and the complete replacement of an existing facility (i.e., a brownfield site) in a similar manner, which creates a disincentive to redevelop or modernize brownfield

The definition of a new facility in the final rule applies to a facility that is repowered only if the existing facility has been demolished and another facility is constructed in its place, and modifies the existing cooling water intake structure to increase the design intake capacity. To the extent commenters assert some inequity of treatment between new facilities and certain existing facilities, EPA will address this comment when it addresses what substantive requirements apply to existing facilities. Further, changes to an existing facility that do not totally replace the process or production equipment that causes a discharge at an existing facility (e.g., partial repowering), and those that do not result in a new separate facility whose processes are substantially independent of any existing source at the same site,

do not result in the facility being defined as a new facility, regardless of whether these changes result in the use of a new or modified cooling water intake structure that increases existing design capacity. EPA does not agree that by not addressing most repowering under this rule the Agency is creating an incentive to use less efficient technology. Both the power-generating and manufacturing industries routinely seek greater efficiency when repowering. This is illustrated by the increased use over the past 10 years of combined-cycle technology, which requires significantly less cooling water for a given level of power generation and is a more efficient process than older technologies.

Several commenters supported EPA's definition of new facility as proposed. In contrast to concerns discussed above, some commenters expressed apprehension that the new facility definition would not capture all appropriate facilities. These commenters observed that an existing facility could rebuild its whole facility behind the cooling water intake structure and not be subject to the requirements applicable to a new facility. These commenters asserted that if an operator completely rebuilds an existing facility that facility should be subject to the new facility requirements.

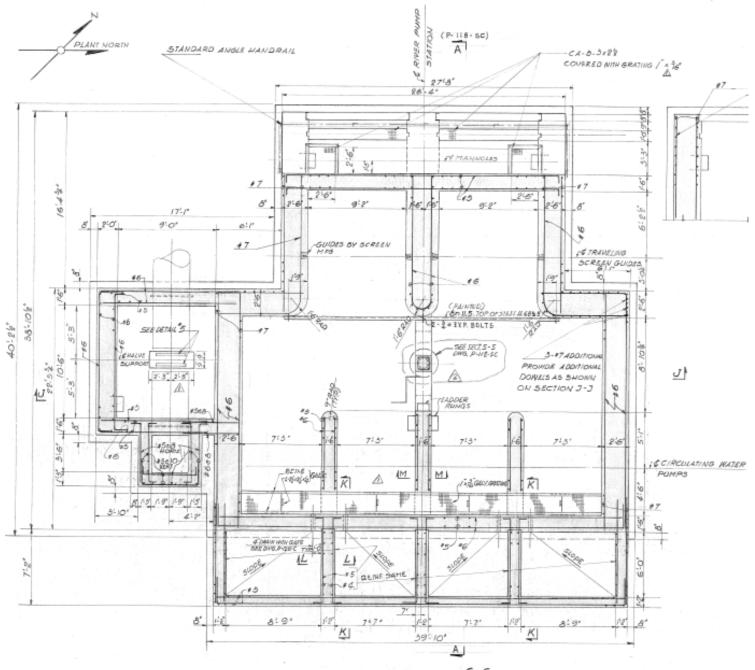
EPA can foresee one instance in which the concern raised by this commenter may be well founded. In this rule EPA has defined a new facility in a manner consistent with existing NPDES regulations, with a limited exception. EPA generally deferred regulation of new sources constructed on a site at which an existing source is located (see 40 CFR 122.29(b)(3)) until the Agency completes analysis of its survey data on existing facilities. However, in addition to meeting the definition of a new source, today's rule requires that a new facility have a new cooling water intake structure or use an existing intake structure that has been modified to increase the design capacity. Thus, it might be possible to completely demolish an existing source, replace it with a smaller-capacity new source, and not be regulated under today's rule as a new facility. This facility would then be an existing facility an as such the requirements applicable to such a facility will be addressed in Phase II and III.

Several commenters requested that EPA define facilities deemed to be substantially independent for purposes of applying the new source criteria under 40 CFR 122.29 as those that could be practicably located at a separate site. Commenters maintained that such an approach is justified because EPA has based the proposed new facility requirements on the assumption that each owner or operator has the option to choose the location of his or her new facility and that such location would be selected to allow the owner or operator to best comply with the intake structure location and operation requirements.

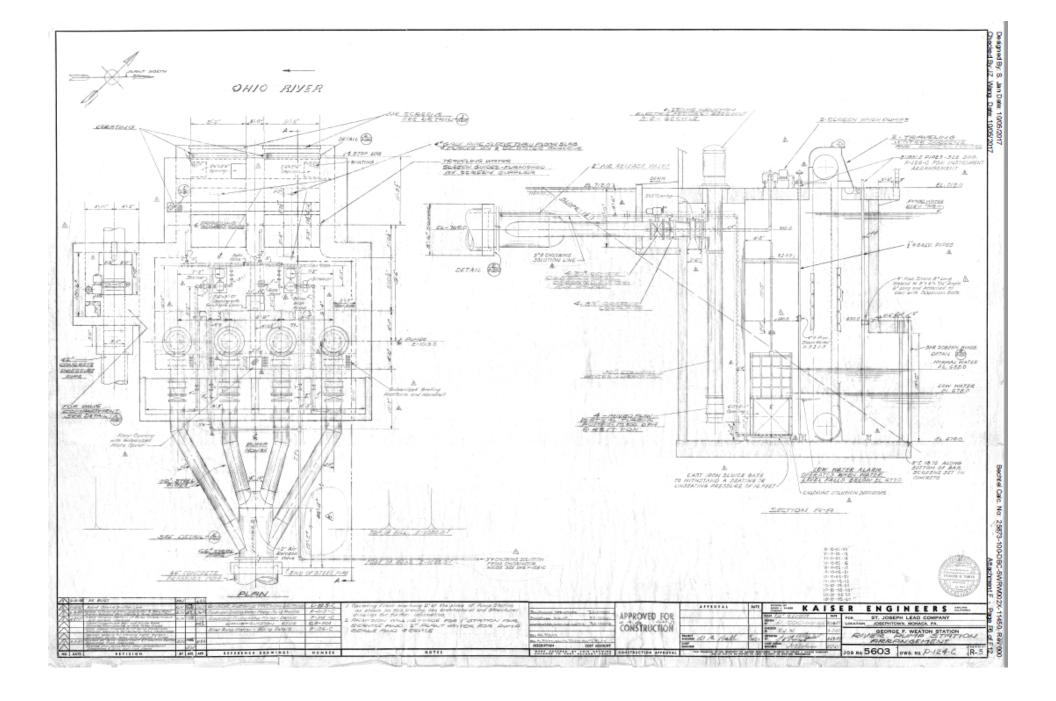
With regard to defining when a facility is substantially independent under 40 CFR 122.29, EPA does not believe it is feasible to project under what circumstances owners and operators are free to select any location they desire for a new facility. For this reason, EPA takes the facility as it is planned for purposes of determining whether it is a new facility. In today's rule EPA does not believe it is appropriate to define the phrase "substantially independent" as used in 122.29(b)(1)(iii) as facilities that could be practicably located at a separate site. Section 122.29(b)(1)(iii) in the existing NPDES regulations already provides that "[i]n determining whether . . . processes are substantially independent, the Director shall consider such factors as the extent to which the new facility is integrated with the existing plant; and the extent to which the new facility is engaged in the same general type of activity as the existing source." EPA does not think it is feasible for the permit authority to judge whether the facility could have been elsewhere for the purpose of determining whether the facility is subject to the new facility rules. Commenters also requested that EPA define what actions constitute routine maintenance to an existing cooling water intake, so that the distinction between changes that constitute maintenance and those that constitute a modification to an existing intake is made clearer.

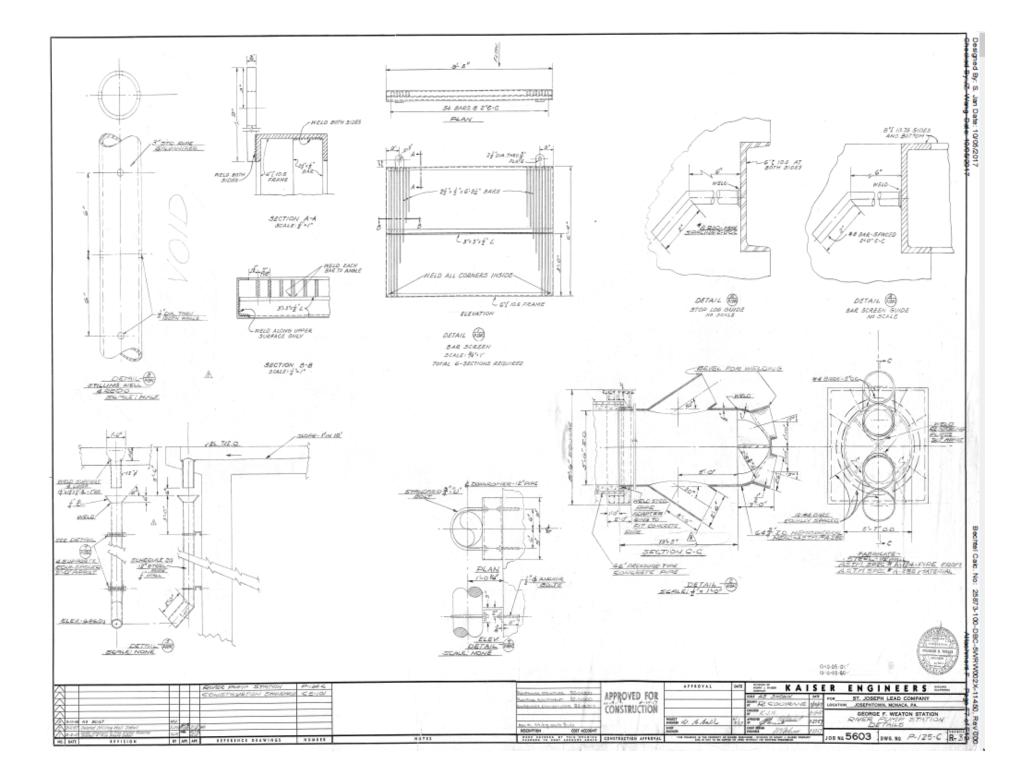
EPA has not defined "routine maintenance" in the final rule because clarifying what constitutes routine maintenance is not vital to the definition of new facility. Under the new facility rule, to be considered a new facility a facility must be a new source or new discharger and use a newly constructed cooling water intake structure or a modified existing cooling water intake structure whose design intake has been increased. Thus, changes to a cooling water intake structure at an existing facility that is not a new source or new discharger are not subject to this rule. In addition, at facilities that are new sources or new dischargers but may use an existing cooling water intake structure, EPA has clarified in the final rule that the facility is subject to this rule only where changes to the intake result in an

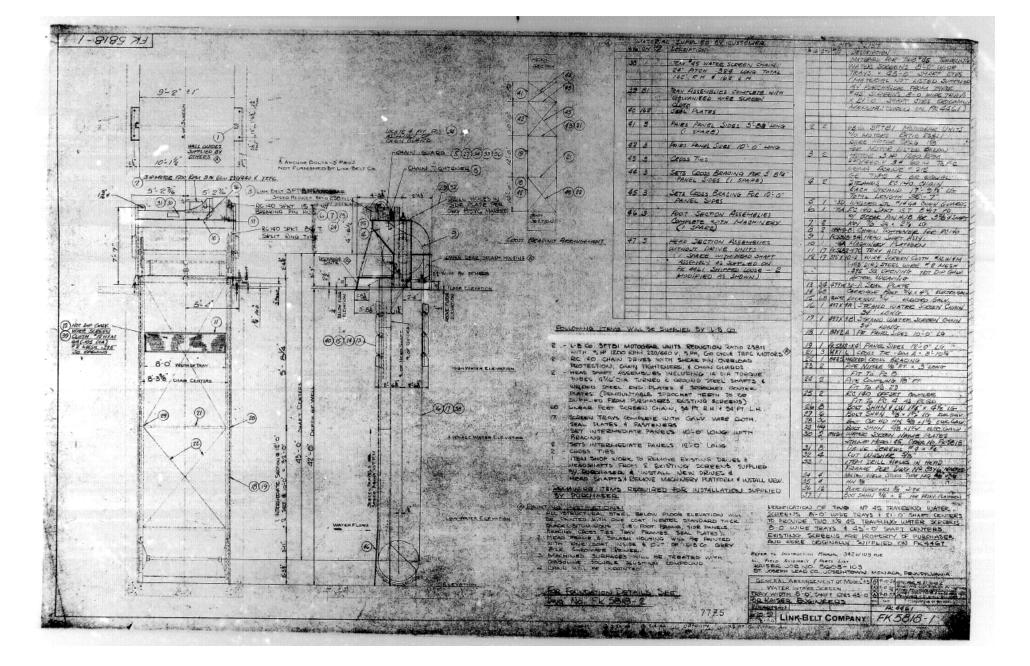
Attachment 2 Drawings for Existing CWIS



SECTION 6.6







Attachment 3 Drawings and Photolog for Refurbishing the Existing CWIS



CALCULATION SHEET

P. O. BOX 2166 HOUSTON, TEXAS 77252-2166

SIGNATURE: JZ. Wang DATE: 01 SEP. 2017 CHECKED: J. Song DATE: 30 SEP 2017

SUBJECT: WWTP – Intake Structure Building – Concrete Design DISCIPLINE: CSA SHEET 3 OF 39

1.0 DESIGN BASIS

1.1 Purpose and Scope

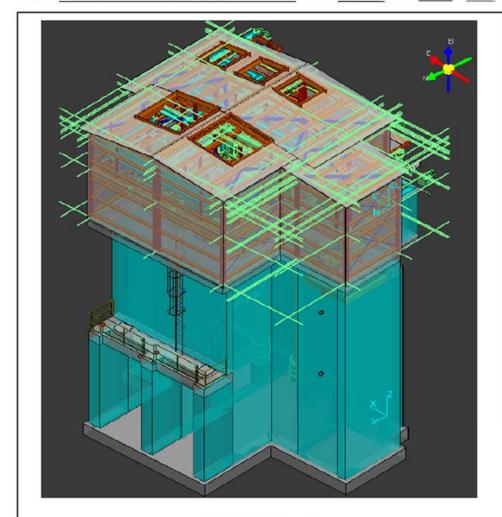
- The plant location is on eastern shore of Ohio River approximately 30 miles NW of Pittsburgh, PA in Potter & Center Townships, Beaver County, Pennsylvania, USA.
- The existing building is designed on 1957. The existing CMU building on the top level (above 712'-0" from the floor slab) is demolished and the structure below 712'-0" remains. The new steel structure is bearing on the existing floor slab of the building. The steel structure design and its anchor bolt connection design see calculation 25873-001-SSC-5WRW002X-15320.
- This calculation includes deck slab check @ elevation 712'-0" only. All existing concrete
 walls and existing concrete other than slab @ 712'-0" level, the whole structure reliability,
 dynamic analysis and repairs procedures see 25873-001-DBC-5WRW002X-11450.
- The existing top slab @ 712'-0" checking includes: one way & two way shear checking and flexural stress checking.



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LOOKING SOUTH EAST

