



April 17, 2023

NOTICE OF VIOLATION

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
Potter Township
Beaver County

Dear Kimberly Kaal:

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. An April 3, 2023 review of the report submitted by Shell on March 27, 2023 identified violations of 25 Pa. Code § 127.25. Specifically, Shell reported to the Department that from January 25, 2023 through February 16, 2023, malodor emissions were observed outside of Shell’s property. The malodor emissions were caused by hydrocarbons in the Wastewater Treatment Plant (WWTP) biotreaters. Shell reported that the root cause of the WWTP malodors was a valve left open between the WWTP and a set of liquid hydrocarbon-containing drums associated with the ECU. This caused hydrocarbons from the drums to be pumped to the WWTP. The Department has identified the following violation from these events:

PA-04-00740C, Section B, Condition #013, states “that a person may not cause or permit the operation of a source subject to § 127.11 (relating to plan approval requirements), unless the source and air cleaning devices identified in the application for the plan approval and the plan approval issued to the source, are operated and maintained in accordance with specifications in the application and conditions in the plan approval issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices”. By leaving the valve open and permitting excess hydrocarbons to be directed to the WWTP, Shell caused violations of PA-04-00740C and 25 Pa. Code § 127.25.

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 sbeaudway@pa.gov or at 412-417-7952.

Sincerely,

Scott Beaudway/SB

Scott Beaudway
Air Quality Specialist
Air Quality

cc: E. Speicher, Environmental Group Manager
K. Goddard, Compliance Specialist
Central Office (via email)
04-00740 Enforcement File