



Shell Chemical Appalachia LLC  
300 Frankfort Rd  
Monaca, PA 15061

March 3, 2025

Mark Gorog, P.E.  
Air Quality Program Regional Manager  
Pennsylvania Department of Environmental Protection  
Southwest Regional Office  
400 Waterfront Drive  
Pittsburgh, PA 15222

**RE: Shell Chemical Appalachia LLC  
Shell Polymers Monaca Site  
Potter and Center Townships, Beaver County  
Plan Approval No. 04-00740A  
Plan Approval Construction Extension Request**

Dear Mr. Gorog:

Shell Chemical Appalachia LLC ("Shell") is requesting an extension of Plan Approval 04-00740A, along with our other associated Plan Approvals (04-00740B and 04-00740C), to extend temporary operation of commenced sources and to authorize the continued commissioning of sources and controls at the above-referenced facility.

The following documents are included in the extension request:

- Plan Approval Extension Form (completed and signed)
- Air Pollution Control Act Compliance Review Supplemental Form (completed and signed)
- Justification for the extension
- Schedule for the completion of the construction

The extension request was submitted via PADEP's OnBase Electronic Forms Upload platform. The application fee of \$750 for the application was paid via credit card through OnBase.

Please contact me at 724-709-2467 or [kimberly.kaal@shell.com](mailto:kimberly.kaal@shell.com) if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberly Kaal", followed by a long horizontal line.

Kimberly Kaal  
Environmental Manager



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF AIR QUALITY

### PLAN APPROVAL EXTENSION FORM

| Current Plan Approval Information                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                  |                                  |                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|----------------------------------|-------------------------------|
| Plan Approval No.: 04-00740A                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Owner Name: <i>Shell Chemical Appalachia LLC</i> |                                  |                               |
| Original Issued Date: 6/18/2015                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Plant Name: <i>Shell Polymers Monaca Site</i>    |                                  |                               |
| Current Expiration Date: 4/28/2025                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Contact Name: <i>Kimberly Kaal</i>               |                                  |                               |
| Project Commenced Date: 2/10/2016                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Contact Title: <i>Environmental Manager</i>      |                                  |                               |
| Contact Telephone: 724-709-2467                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Contact Email: <i>kimberly.kaal@shell.com</i>    |                                  |                               |
| Municipality: <i>Potter &amp; Center Twp</i>                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Mailing Address: <i>300 Frankfort Road</i>       |                                  |                               |
| County: <i>Beaver</i>                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                         | City: <i>Monaca</i>                              | State: <i>PA</i>                 | Zip Code: <i>15061</i>        |
| List of Source(s) and/or Air Cleaning Devices Specified in the Plan Approval (attach additional pages as needed)                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                  |                                  |                               |
| Source ID                                                                                                                                                                                                                                                                                                                                                                                                                             | Source Name                                                                                                                                                                                                                                                                                                                                                                                                                                             | Air Cleaning Device                              | Date of Completion               | Operational Commencement Date |
|                                                                                                                                                                                                                                                                                                                                                                                                                                       | <i>See attached schedule</i>                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                  |                                  |                               |
|                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                  |                                  |                               |
| Reason for Extension (see instructions)                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                  |                                  |                               |
| <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                   | (A) Plan Approval Extension to continue construction, modification, reactivation of the source(s) or installation of air cleaning device(s) in accordance with 25 Pa. Code §127.13(a).                                                                                                                                                                                                                                                                  |                                                  |                                  |                               |
| <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                   | (B) Plan Approval Extension to extend temporary operation to facilitate the shake-down of sources and air cleaning devices, to permit operation pending issuance of a permit under Subchapter F (relating to operating permit requirements) or Subchapter G (relating to Title V operating permits) or to allow the evaluation of the source(s) for compliance with applicable regulations and requirements in accordance with 25 Pa. Code §127.12b(d). |                                                  |                                  |                               |
| <input type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                              | (C) Other (including the extension of the 18-month period specified in 25 Pa. Code §127.13(b)).                                                                                                                                                                                                                                                                                                                                                         |                                                  |                                  |                               |
| Checklist                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                  |                                  |                               |
| <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                   | Included Air Quality Fees Schedule                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                  |                                  |                               |
| <input type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                              | Fees are not required in accordance with 25 Pa. Code § 127.702(i)(3); justification included                                                                                                                                                                                                                                                                                                                                                            |                                                  |                                  |                               |
| <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                   | Included justification for the extension request                                                                                                                                                                                                                                                                                                                                                                                                        |                                                  |                                  |                               |
| <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                   | Included complete Compliance Review Form or Compliance Review Supplemental Form if one has not been submitted within 6 months from the date of this application                                                                                                                                                                                                                                                                                         |                                                  |                                  |                               |
| <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                   | Plan Approval Extension Form signed by a responsible official                                                                                                                                                                                                                                                                                                                                                                                           |                                                  |                                  |                               |
| Certification of Truth, Accuracy and Completeness                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                  |                                  |                               |
| I certify that, subject to the penalties of Title 18 Pa. C.S.A. Section 4904 and 35 P.S. Section 4009(b)(2), I am the responsible official having primary responsibility for the design and operation of the facilities to which this application applies and that the information provided in this application is true, accurate, and complete to the best of my knowledge, information, and belief formed after reasonable inquiry. |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                  |                                  |                               |
| Name (Type): <i>Nathan Levin</i>                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                  | Title: <i>Operations Manager</i> |                               |
| Name (Signed):                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                  | Date: <i>3-4-25</i>              |                               |



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF AIR QUALITY

## AIR POLLUTION CONTROL ACT COMPLIANCE REVIEW SUPPLEMENTAL FORM

Fully and accurately provide the following information, as specified. Attach additional sheets as necessary.

**Date of Submission of Original Compliance Review Form** 05/01/2014

**Type of Supplemental Compliance Review Form Submittal (check all that apply)**

☐ Original Filing      ☒ Amended Filing  
☐ No Changes      ☐ Date of Last Compliance Review Form Filing 9/13/2024

**Type of Submittal**

☐ New Plan Approval      ☐ New Operating Permit      ☐ Renewal of Operating Permit  
☒ Extension of Plan Approval      ☐ Change of Ownership      ☐ Periodic Submission  
☐ Other \_\_\_\_\_ (every six months)

### SECTION A. GENERAL APPLICANT INFORMATION

**1. Name of Applicant/Permittee/("Applicant")** (non-corporations attach documentation of legal name)

Shell Chemical Appalachia LLC

Address 300 Frankfort Road  
Monaca, PA 15061

Telephone 724-709-2467

Taxpayer ID# 46-1624986

Permit, Plan Approval or Application ID# PA-04-00740A

**2. Identify the form of management under which the applicant conducts its business.**

☐ Individual      ☐ Fictitious Name      ☐ Association  
☐ Municipality      ☐ Partnership      ☐ Syndicate  
☐ Proprietorship      ☐ Limited Partnership  
☐ Public corporation      ☐ Government Agency  
☐ Private Corporation      ☐ Joint Venture  
☐ Municipal Authority      ☒ Other Type of Business (specify) Limited Liability Company

**3. Describe the type(s) of business activities performed.**

\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission.

No Changes

**SECTION B. GENERAL INFORMATION REGARDING "APPLICANT"**

If applicant is a corporation or a division or other unit of a corporation, provide the names, principal places of business, state of incorporation, and taxpayer ID numbers of all domestic and foreign parent corporations (including the ultimate parent corporation), and all domestic and foreign subsidiary corporations of the ultimate parent corporation with operations in Pennsylvania. Please include all corporate divisions or units, (whether incorporated or unincorporated) and privately held corporations. (A diagram of corporate relationships may be provided to illustrate corporate relationships.) Attach additional sheets as necessary.

\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission.

| Unit Name  | Principal Places of Business | State of Incorporation | Taxpayer ID | Relationship to Applicant |
|------------|------------------------------|------------------------|-------------|---------------------------|
| No Changes |                              |                        |             |                           |
|            |                              |                        |             |                           |
|            |                              |                        |             |                           |
|            |                              |                        |             |                           |

**SECTION C. INFORMATION REGARDING APPLICANT & ITS "RELATED PARTIES"**

**1. Pennsylvania Facilities.** List the name and location (mailing address, municipality, county), telephone number, and relationship to applicant (parent, subsidiary or general partner) of all Related Parties' places of business, and facilities in Pennsylvania. Attach additional sheets as necessary.

\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission.

| Unit Name  | Street Business | County and Municipality | Telephone No. | Relationship to Applicant |
|------------|-----------------|-------------------------|---------------|---------------------------|
| No Changes |                 |                         |               |                           |
|            |                 |                         |               |                           |
|            |                 |                         |               |                           |
|            |                 |                         |               |                           |

**2. General Partners.** Provide the names and business addresses of all general partners of the applicant and parent corporation, if any.

\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission.

| Name       | Business Address |
|------------|------------------|
| No Changes |                  |
|            |                  |
|            |                  |
|            |                  |

**3. Management Responsibility.** Provide the names and business of persons with overall management responsibility for the process being permitted (i.e., plant manager).

\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission.

| Name                                                                    | Business Address                                                        |
|-------------------------------------------------------------------------|-------------------------------------------------------------------------|
| Nathan Levin<br>Operations Manager<br>Shell Chemical Appalachia LLC     | Shell Chemical Appalachia LLC<br>300 Frankfort Road<br>Monaca, PA 15061 |
| Kimberly Kaal<br>Environmental Manager<br>Shell Chemical Appalachia LLC | Shell Chemical Appalachia LLC<br>300 Frankfort Road<br>Monaca, PA 15061 |

- 4. Plan Approvals or Operating Permits.** List all plan approvals or operating permits issued by the Department or an approved local air pollution control agency under the APCA to the applicant or related parties that are currently in effect or have been in effect at any time five years prior to the date on which this form is notarized. This list shall include the plan approval and operating permit numbers, locations, issuance and expiration dates. Attach additional sheets as necessary.

\* \* \* Supplemental \* \* \*

List only those changes since the date of the last original submission.

| Source     | Plan Approval<br>Operating Permit<br>Number | Location | Issuance<br>Date | Expiration<br>Date |
|------------|---------------------------------------------|----------|------------------|--------------------|
| No Changes |                                             |          |                  |                    |
|            |                                             |          |                  |                    |
|            |                                             |          |                  |                    |
|            |                                             |          |                  |                    |
|            |                                             |          |                  |                    |
|            |                                             |          |                  |                    |

## SECTION D. COMPLIANCE BACKGROUND

*Note: Copies of specific documents, if applicable, must be made available to the Department upon its request.)*

- 1. Documented Conduct.** List all documented conduct of violations or enforcement actions identified by the Department pursuant to the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. Attach additional sheets as necessary. See the definition of "documented conduct" for further clarification. Unless specifically directed by the Department, deviations which have been previously reported to the Department in writing, relating to monitoring and reporting, need not be reported.

\* \* \* Supplemental \* \* \*

List only those changes since the date of the last original submission.

| Date       | Location              | Plan Approval/<br>Operating Permit# | Nature of Documented Conduct                                                                                                                                                                                                                                                                                     | Type of Department Action | Status Litigation; Existing / Continuing; or corrected/Date | Dollar Amount Penalty |
|------------|-----------------------|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-------------------------------------------------------------|-----------------------|
| 9/18/2024  | Shell Polymers Monaca | PA-04-00740A/B/C                    | Exceedances of 12-Month Emission Limitations for NOx [August 2024]                                                                                                                                                                                                                                               | Notice of Violation       | Pending                                                     | TBD                   |
| 10/23/2024 | Shell Polymers Monaca | PA-04-00740A/B/C                    | Exceedances of 12-Month Emission Limitations for NOx [September 2024]                                                                                                                                                                                                                                            | Notice of Violation       | Pending                                                     | TBD                   |
| 11/26/2024 | Shell Polymers Monaca | PA-04-00740A/B/C                    | Exceedances of 12-Month Emission Limitations for NOx [October 2024]                                                                                                                                                                                                                                              | Notice of Violation       | Pending                                                     | TBD                   |
| 12/12/2024 | Shell Polymers Monaca | PA-04-00740A/B/C                    | Exceedances of 12-Month Emission Limitations for NOx [November 2024]                                                                                                                                                                                                                                             | Notice of Violation       | Pending                                                     | TBD                   |
| 1/23/2025  | Shell Polymers Monaca | PA-04-00740A/B/C                    | Exceedances of 12-Month Emission Limitations for NOx [December 2024]                                                                                                                                                                                                                                             | Notice of Violation       | Pending                                                     | TBD                   |
| 2/19/2025  | Shell Polymers Monaca | PA-04-00740A/B/C                    | Exceedances of 12-Month Emission Limitations for NOx [January 2025]                                                                                                                                                                                                                                              | Notice of Violation       | Pending                                                     | TBD                   |
| 2/12/2025  | Shell Polymers Monaca | PA-04-00740A/B/C                    | Cogen Units NOx Emission Limit Exceedances:<br>- 2/23/2024 Cogen Unit 103<br>- 7/4/2024 Cogen Unit 102                                                                                                                                                                                                           | Notice of Violation       | Pending                                                     | TBD                   |
| 2/12/2025  | Shell Polymers Monaca | PA-04-00740A/B/C                    | Ethane Cracking Furnaces NOx Emission Limit Exceedances:<br>- 1/20/2024: Furnace 1 (031) and Furnace 2 (032)<br>- 3/18/2024 Furnace 3 (033)<br>- 6/21-22/2024 Furnace 3 (033)<br>- 9/30/2024 Furnace 6 (036)                                                                                                     | Notice of Violation       | Pending                                                     | TBD                   |
| 2/12/2025  | Shell Polymers Monaca | PA-04-00740A/B/C                    | Ethane Cracking Furnaces NOx Emission Limit Exceedances:<br>- 11/8/2024 Furnace 1 (031), Furnace 3 (033), Furnace 4 (034), Furnace 5 (035); Furnace 6 (036)<br>- 11/9/2024 Furnace 6 (036)<br><br>Visible Emissions >5 min in consecutive 2 hrs from the TEGF A C205A, TEGF B C205B, and HPEF C205C on 11/8/2024 | Notice of Violation       | Pending                                                     | TBD                   |

**SECTION D. COMPLIANCE BACKGROUND**

*Note: Copies of specific documents, if applicable, must be made available to the Department upon its request.)*

- 1. Documented Conduct.** List all documented conduct of violations or enforcement actions identified by the Department pursuant to the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. Attach additional sheets as necessary. See the definition of "documented conduct" for further clarification. Unless specifically directed by the Department, deviations which have been previously reported to the Department in writing, relating to monitoring and reporting, need not be reported.

\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission.

| Date      | Location              | Plan Approval/<br>Operating Permit# | Nature of Documented Conduct                                                                 | Type of Department Action | Status Litigation; Existing / Continuing; or corrected/Date | Dollar Amount Penalty |
|-----------|-----------------------|-------------------------------------|----------------------------------------------------------------------------------------------|---------------------------|-------------------------------------------------------------|-----------------------|
| 2/12/2025 | Shell Polymers Monaca | PA-04-00740A/B/C                    | Visible Emissions >5 min in consecutive 2 hrs from the MPGF C204B on 9/16/2024 and 9/18/2024 | Notice of Violation       | Pending                                                     | TBD                   |
| 2/12/2025 | Shell Polymers Monaca | PA-04-00740A/B/C                    | Visible Emissions >5 min in consecutive 2 hrs from the MPGF C204B on 12/6/2024               | Notice of Violation       | Pending                                                     | TBD                   |

**CONTINUING OBLIGATION:** Applicant is under a continuing obligation to update this form using the Compliance Review Supplemental Form if any additional documented conduct occurs or related parties develop between the date of submission and Department action on its application

**2. Incidents of Deviation.** List all incidents of deviations of the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. This list must include items both currently known and unknown to the Department. Attach additional sheets as necessary. See the definition of "deviations" for further clarification.

\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission.

| Date                                                                                                                 | Location              | Plan Approval/<br>Operating Permit# | Nature of Deviation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Incident Status:<br>Existing/Continuing; or<br>Corrected Date                                                                                                                                                                                                                                                               |
|----------------------------------------------------------------------------------------------------------------------|-----------------------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2/1/2024 to present                                                                                                  | Shell Polymers Monaca | PA-04-00740A/C                      | Site-wide NOx 12-month rolling limitation: The COA expired end of January 2024. Site remains non-compliant with emission limitation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Continuing deviation. Engineering improvements and permitting corrections to match facility design. Proposed to be resolved in plan approval modification application.                                                                                                                                                      |
| 12/12/2025<br>1/21/2025                                                                                              | Shell Polymers Monaca | PA-04-00740A/C                      | Cogeneration Units: Exceeded NOx 2 ppmvd at 15% O2 as detailed below:<br>Unit 1: 1 hr on 12/12/2024<br>Unit 2: 1 hr on 12/12/2024<br>Unit 2: 1 hr on 1/21/2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Corrected after each incident. See Malfunction Report submitted on 2/18/2025 for deviation on 1/21/2025. Each deviation is, or will be, addressed in quarterly excess emission reports.                                                                                                                                     |
| 1/22/2025<br>1/23/2025                                                                                               | Shell Polymers Monaca | PA-04-00740A/C                      | Cogeneration Units: NH3 Excess Emissions on Cogen 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Corrected after each incident.                                                                                                                                                                                                                                                                                              |
| 9/30/2024<br>10/3/2024<br>10/4/2024<br>10/13/2024<br>11/5/2024<br>11/8/2024<br>11/9/2024<br>11/19/2024<br>11/20/2024 | Shell Polymers Monaca | PA-04-00740A/C                      | Cracking Furnaces:<br>Exceeded NOx 6.2 lbs/hr during decoking, hot steam standby, feed in or feed out:<br>9/30/2024: Furnace 6 (036) for 1 hour<br>10/3/2024: Furnace 4 (034) for 1 hour<br>10/4/2024: Furnace 2 (032) for 1 hour<br>11/5/2024: Furnace 6 (036) for 1 hour<br>11/8/2024: Furnace 5 (035) for 1 hour<br>11/8/2024: Furnace 6 (036) for 3 hours<br>11/9/2024: Furnace 6 (036) for 1 hour<br>11/19/2024: Furnace 4 (034) for 1 hour<br><br>Exceeded NOx 0.015 lb/MMBtu hourly average during normal operating mode:<br>10/13/2024: Furnace 2 (032) for 1 hour<br>11/8/2024: Furnace 1 (031) for 1 hour<br>11/8/2024: Furnace 3 (033) for 1 hour<br>11/8/2024: Furnace 4 (034) for 2 hours<br>11/20/2024: Furnace 1 (031) for 1 hour | Corrected after each incident. See Malfunction Report submitted on 10/22/2024 for the 9/30/2024 deviation. See Malfunction Report submitted on 12/9/2024, and follow-up report submitted on 2/6/2025 for the 11/8 and 11/9/2024 deviations. The deviations are, or will be, addressed in quarterly excess emission reports. |
| Q4 2022 (Furnace 5)<br>Q1-Q4 2023 (Furnaces 1-7)                                                                     | Shell Polymers Monaca | PA-04-00740A/C                      | Cracking Furnaces CEMS Report: Reports required to be resubmitted due to inaccurate data from the density analyzer, resulting in inaccurate mass fuel gas consumption and resulting NOx and CO emissions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Density meter settings were corrected on November 19, 2024, and quarterly CEMS report must be submitted for the Q4 2022 for Furnace 5 only and Q1-Q4 2023 for all furnaces. These revised reports will be submitted by May 2025.                                                                                            |
| Q1-Q3 2024 (Furnaces 1-7)                                                                                            | Shell Polymers Monaca | PA-04-00740A/C                      | Cracking Furnaces CEMS Report: Reports required to be resubmitted due to inaccurate data from the density analyzer, resulting in inaccurate mass fuel gas consumption and resulting NOx and CO emissions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Density meter settings inaccuracies were corrected on November 19, 2024, and quarterly CEMS report must be submitted for the Q4 2022 for Furnace 5 only and Q1-Q4 2023 for all furnaces. These revised reports will be submitted by March 2025.                                                                             |

**2. Incidents of Deviation.** List all incidents of deviations of the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. This list must include items both currently known and unknown to the Department. Attach additional sheets as necessary. See the definition of "deviations" for further clarification.

\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission.

| Date                                                                                                                                                | Location              | Plan Approval/<br>Operating Permit# | Nature of Deviation                                                                                                                                                                     | Incident Status:<br>Existing/Continuing; or<br>Corrected Date                                                                                                                                                                                                                                                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2022 to present                                                                                                                                     | Shell Polymers Monaca | PA-04-00740A/C                      | Maximum designed water circulation rate through the cogeneration cooling tower is greater than limit in permit.                                                                         | Continuing deviation. Correcting the designed water circulation rate for as-built in the plan approval modification application.                                                                                                                                                                                                    |
| 9/29/2024 (1 15-min block period): TEGF A/B<br><br>10/7/2024 (1 15-min block period): TEGF A/B<br><br>11/10/2024 (2 15-min block periods): TEGF A/B | Shell Polymers Monaca | PA-04-00740A/C                      | Net Heating Value TEGFs A/B.<br>Did not meeting requirements for NHV of $\geq 800$ Btu/scf in 40 CFR Part 63 Subparts YY and FFFF as required for pressure-assisted multi-point flares. | Corrected after each incident.                                                                                                                                                                                                                                                                                                      |
| 7/6/2023 to present                                                                                                                                 | Shell Polymers Monaca | PA-04-00740A/C                      | HPEF is not equipped with required monitoring system capable of continuously measuring, calculating, and recording the volumetric flow rate of assist steam.                            | There are 2 steam lines: center steam and upper steam. As of February 26, 2025, monitoring equipment has been added to measure and calculate the upper steam flow to the flare. The timeline for the monitoring equipment for the center steam is currently being evaluated as some project execution issues have been encountered. |
| 7/6/2023 to present                                                                                                                                 | Shell Polymers Monaca | PA-04-00740A/C                      | HPEF is not equipped with automated controls for the control of the total steam mass flow rate to the flare.                                                                            | A control valve will be installed in the center steam assist line to ensure proper controls - the timeline is currently being evaluated as some project execution issues have been encountered. . The large steam line has an existing control valve and automated controls.                                                        |
| 9/16/2024                                                                                                                                           | Shell Polymers Monaca | PA-04-00740A/C                      | Visible Emissions MPGF. Visible emissions > 5 minutes in consecutive 2 hours caused by MPGF Ethylene Tank Header.                                                                       | Corrected. See Malfunction Report submitted dated 10/9/2024, submitted on 10/11/2024.                                                                                                                                                                                                                                               |
| 9/18/2024                                                                                                                                           | Shell Polymers Monaca | PA-04-00740A/C                      | Visible Emissions MPGF. Visible emissions > 5 minutes in consecutive 2 hours caused by MPGF Ethylene Tank Header.                                                                       | Corrected. See Malfunction Report submitted dated 10/9/2024, submitted on 10/11/2024.                                                                                                                                                                                                                                               |
| 11/8/2024                                                                                                                                           | Shell Polymers Monaca | PA-04-00740A/C                      | Visible Emissions TEGF A, TEGF B and HPEF. Visible emissions > 5 minutes in consecutive 2 hours for each flare.                                                                         | Corrected. See Malfunction Report submitted on 12/9/2024, and follow-up report submitted on 2/6/2025.                                                                                                                                                                                                                               |
| 12/6/2024                                                                                                                                           | Shell Polymers Monaca | PA-04-00740A/C                      | Visible Emissions MPGF. Visible emissions > 5 minutes in consecutive 2 hours caused by MPGF Ethylene Tank Header.                                                                       | Corrected. See Malfunction Report submitted on 1/6/2025.                                                                                                                                                                                                                                                                            |

**2. Incidents of Deviation.** List all incidents of deviations of the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. This list must include items both currently known and unknown to the Department. Attach additional sheets as necessary. See the definition of "deviations" for further clarification.

\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission.

| Date                                                                                                                                                                                                                                                                     | Location              | Plan Approval/<br>Operating Permit#                                            | Nature of Deviation                                                                                                                                                                                                                                                                                                                                                                                                    | Incident Status:<br>Existing/Continuing; or<br>Corrected Date                                                                                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|--------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9/2022 to present                                                                                                                                                                                                                                                        | Shell Polymers Monaca | PA-04-00740A/C                                                                 | <p>LP and HP Header Systems: Root cause analysis (RCA) is required within 45 days after any startup, shutdown, or unforeseeable flaring event.</p> <p>HP Flare System: 9 RCAs were not completed within the 45-day window. Of these, 1 RCA remains outstanding as of submittal.</p> <p>LP Flare System: 28 RCAs were not completed within the 45-day window. Of these, 21 RCAs remain outstanding as of submittal.</p> | Corrected. Update to the last Compliance Review Form: All outstanding RCA's have been completed and deviation has been corrected.                                 |
| <p>SCTO Downtime:<br/>12/2024: ~174 hours</p> <p>FEORs/ROT Blower Downtime:<br/>9/2024: 1.6 hrs<br/>11/2024: ~ 3 min<br/>12/2024: ~114 hrs<br/>1/2025: ~5.5 hrs</p> <p>Spent Caustic Blower Downtime:<br/>9/2024: ~10 min<br/>12/2024: ~169 hrs<br/>1/2025: ~5.5 hrs</p> | Shell Polymers Monaca | <p>PA-04-00740A/C</p> <p>RFD 10277; Approval Date 8/9/2023 for WEMCO/EC-15</p> | <p>SCTO and SCTO Blower Downtime. Small amounts of excess emissions from FEOR A/B, recovered oil, spent caustic storage tanks, and temporary WEMCO and EC-15 Units due to either SCTO or blower issues where emissions did not go to the SCTO. The tanks are internal floating roof tanks with minimal uncontrolled emissions.</p>                                                                                     | <p>Corrected after each incident.</p> <p>The December 2024 blower downtime is associated with SCTO downtime for burner replacements.</p>                          |
| 11/6/2024                                                                                                                                                                                                                                                                | Shell Polymers Monaca | PA-04-00740A/C                                                                 | PFO Storage Tanks. Uncontrolled releases through the relief vents during maintenance, resulting in offsite malodors.                                                                                                                                                                                                                                                                                                   | Corrected. See Malfunction Report submitted on 12/5/2024.                                                                                                         |
| 5/21/2024 Test Date                                                                                                                                                                                                                                                      | Shell Polymers Monaca | PA-04-00740A/C                                                                 | CVTO stack test results not compliant with emission limitations for PM10 and PM2.5.                                                                                                                                                                                                                                                                                                                                    | Corrected. Update to the last Compliance Review Form: Retested in September 17 and 18, 2024. Report submitted to PADEP on November 15, 2024 with passing results. |

**2. Incidents of Deviation.** List all incidents of deviations of the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. This list must include items both currently known and unknown to the Department. Attach additional sheets as necessary. See the definition of "deviations" for further clarification.

\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission.

| Date                                     | Location                 | Plan Approval/<br>Operating Permit# | Nature of Deviation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Incident Status:<br>Existing/Continuing; or<br>Corrected Date                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|------------------------------------------|--------------------------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5/23/2024 Test Date                      | Shell Polymers<br>Monaca | PA-04-<br>00740A/C                  | SCTO stack test results not compliant with emission limitations for NOx, PM10, and PM2.5.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Corrected for PM10/PM2.5. Update to the last Compliance Review Form: Retested on 9/20 and 9/21/2024 for PM10 and PM. Report submitted to PADEP on 11/19/2024 with passing results.<br><br>NOx: Burner tip modifications occurred in December 2024, but did not yield a passing NOx emission factor. Temporary mitigation of limiting the combustion temperature setpoint has been put in place to ensure lb/hr NOx stays below PTE basis. Currently progressing other interim mitigations: Air-to-fuel ratio optimizations; relocating natural gas valve to improve burner tuning capabilities. |
| Jan 2022 Test Date<br>Dec 2022 Test Date | Shell Polymers<br>Monaca | PA-04-<br>00740A/C                  | PADEP has deemed the following test results as unacceptable for the Cogen Units:<br><br>Cogen Unit 1: Ammonia, Benzene, Toluene, Formaldehyde during 1/28/2022 Test (Report Date 3/23/2022)<br><br>Cogen Unit 1: Benzene, Toluene, Formaldehyde during 12/1/2022 Test (Report Date 2/9/2023)<br><br>Cogen Unit 2: Ammonia, Benzene, Toluene, Formaldehyde during 1/21/2022 Test (Report Date 3/23/2022)<br><br>Cogen Unit 2: Toluene, Formaldehyde during 12/9/2022 Test (Report Date 2/9/2023)<br><br>Cogen Unit 3: Ammonia, Benzene, Toluene, Formaldehyde during 1/26/2022 Test (Report Date 3/23/2022)<br><br>Cogen Unit 3: Toluene during 12/8/2022 Test (Report Date 2/9/2023) | Corrected Ammonia: QA/QC data was submitted in 2/2025 to correct reports.<br><br>Corrected Formaldehyde: June 2024 test report submitted for review to serve as correction to previous testing.<br><br>Benzene and Toluene: Testing rescheduled for week of March 24, 2025. Revised test protocol to be submitted for approval prior to testing.                                                                                                                                                                                                                                                |

**CONTINUING OBLIGATION:** Applicant is under a continuing obligation to update this form using the Compliance Review Supplemental Form if any additional documented conduct occur or related parties develop between the date of submission and Department action on its application

**VERIFICATION STATEMENT**

Subject to the penalties of Title 18 Pa.C.S. Section 4904 and 35 P.S. Section 4009(b)(2), I verify under penalty of law that I am authorized to make this verification on behalf of the Applicant/Permittee. I further verify that the information contained in this Compliance Review Supplemental Form is true and complete to the best of my belief formed after reasonable inquiry. I further verify that reasonable procedures are in place to ensure that "documented conduct" and "deviations" as defined in 25 Pa Code Section 121.1 are identified and included in the information set forth in this Compliance Review Supplemental Form.



Signature

3-4-25

Date

Nathan Levin

Name (Print or Type)

Operations Manager

Title

**Attachment A**  
**Plan Approval Extension Justification**

Shell is required to request an extension of the plan approvals until the Title V Operating Permit is issued. In accordance with PA-04-00740A, Section B, Condition #003 (d), Shell is requesting an extension of the 180-day shakedown period to continue temporary operation of sources that have commenced operation and for continued commissioning and emission testing activities of the remaining permitted sources and air cleaning devices. PA-04-00740A was first issued on June 18, 2015 and PA-04-00740B and C were issued on February 18, 2021, with all three permits expiring on April 28, 2025.

Shell submitted the initial *Title V Operating Permit Application* to PADEP on June 19, 2024 in response to a February 22, 2024 letter from PADEP requiring the submission of a Title V Operating Permit Application by June 21, 2024. Then, on September 13, 2024, Shell submitted a *Plan Approval Modification Application* to PADEP to propose permanent Wastewater Treatment Plant (WWTP) controls, to request incorporation of the appropriate Ethylene Maximum Achievable Control Technology (EMACT) requirements into the permit, and to reconcile specific plan approval source descriptions, potential-to-emit calculations, and conditions within the permit.

Shell is requesting an extension of the Plan Approvals A, B and C until an updated plan approval is issued by PADEP in response to the *Plan Approval Modification Application* submitted in September 2024.

## Attachment B

List of Source(s) and/or Air Cleaning Devices Specified in Plan Approval No. 04-00740 A, B and C

| Source ID | Source Name                            | Air Cleaning Device              | Date of Completion | Operational Commencement Date                                               |
|-----------|----------------------------------------|----------------------------------|--------------------|-----------------------------------------------------------------------------|
| 031       | Ethane Cracking Furnace #1             |                                  | July 6, 2022       | July 30, 2022, lit burners to start dry out. Ethane feed in Sep. 5, 2022.   |
| 032       | Ethane Cracking Furnace #2             |                                  | July 6, 2022       | May 27, 2022, lit burners to start dry out. Ethane feed in Sep. 13, 2022    |
| 033       | Ethane Cracking Furnace #3             |                                  | July 6, 2022       | June 1, 2022, lit burners to start dry out. Ethane feed in Sep. 6, 2022     |
| 034       | Ethane Cracking Furnace #4             |                                  | July 6, 2022       | August 17, 2022, lit burners to start dry out. Ethane feed in Sep. 17, 2022 |
| 035       | Ethane Cracking Furnace #5             |                                  | July 6, 2022       | May 12, 2022, lit burners to start dry out. Ethane feed in Sep. 5, 2022     |
| 036       | Ethane Cracking Furnace #6             |                                  | July 6, 2022       | May 6, 2022, lit burners to start dry out. Ethane feed in Sep. 25, 2022     |
| 037       | Ethane Cracking Furnace #7             |                                  | July 6, 2022       | April 14, 2022, lit burners to start dry out. Ethane feed in Sep. 8, 2022   |
| C031      |                                        | SCR (Ethane Cracking Furnace #1) | August 15, 2022    | August 15, 2022                                                             |
| C032      |                                        | SCR (Ethane Cracking Furnace #2) | June 15, 2022      | June 15, 2022                                                               |
| C033      |                                        | SCR (Ethane Cracking Furnace #3) | June 19, 2022      | June 19, 2022                                                               |
| C034      |                                        | SCR (Ethane Cracking Furnace #4) | August 30, 2022    | August 30, 2022                                                             |
| C035      |                                        | SCR (Ethane Cracking Furnace #5) | May 22, 2022       | May 22, 2022                                                                |
| C036      |                                        | SCR (Ethane Cracking Furnace #6) | May 13, 2022       | May 13, 2022                                                                |
| C037      |                                        | SCR (Ethane Cracking Furnace #7) | April 22, 2022     | April 22, 2022                                                              |
| 101       | Combustion Turbine/Duct Burner Unit #1 |                                  | June 24, 2021      | June 24, 2021                                                               |

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| Source ID         | Source Name                                  | Air Cleaning Device                       | Date of Completion                                                   | Operational Commencement Date  |
|-------------------|----------------------------------------------|-------------------------------------------|----------------------------------------------------------------------|--------------------------------|
| 102               | Combustion Turbine/Duct Burner Unit #2       |                                           | June 20, 2021                                                        | June 20, 2021                  |
| 103               | Combustion Turbine/Duct Burner Unit #3       |                                           | June 30, 2021                                                        | June 30, 2021                  |
| C101              |                                              | SCR (Unit #1)                             | July 2021                                                            | Sep 2021                       |
| C101A             |                                              | Oxidation Catalyst (Unit #1)              | July 2021                                                            | Sep 2021                       |
| C102              |                                              | SCR (Unit #2)                             | July 2021                                                            | August 2021                    |
| C102A             |                                              | Oxidation Catalyst (Unit #2)              | July 2021                                                            | August 2021                    |
| C103              |                                              | SCR (Unit #3)                             | July 2021                                                            | Sep 2021                       |
| C103A             |                                              | Oxidation Catalyst (Unit #3)              | July 2021                                                            | Sep 2021                       |
| 104               | Cogeneration Plant Cooling Tower(s)          |                                           | June 20, 2021                                                        | June 20, 2021                  |
| C104              |                                              | Drift Eliminators (Process Cooling Tower) | June 20, 2021                                                        | June 20, 2021                  |
| 105 <sup>a</sup>  | Diesel-Fired Emergency Generator Engines (2) |                                           | March 2, 2020                                                        | March 2, 2020                  |
| 106               | Fire Pump Engines (2)                        |                                           | Dec 4, 2020                                                          | Dec 4, 2020,                   |
| 107 <sup>a</sup>  | Natural Gas-Fired Emergency Generators (3)   |                                           | March 2, 2020                                                        | March 2, 2020                  |
| 201               | Ethylene Manufacturing Line                  |                                           | July 6, 2022                                                         | September 7 2022 feed into ECU |
| 202 <sup>b</sup>  | Polyethylene Manufacturing Lines             |                                           | July 6, 2022                                                         | See Note b                     |
| C202 <sup>b</sup> |                                              | Particulate Filters (PE MFG)              | July 6, 2022                                                         | See Note b                     |
| 203               | Process Cooling Tower(s)                     |                                           | July 6, 2022, including chemical cleaning and passivation activities | September 7 2022 feed into ECU |
| C203              |                                              | Drift Eliminators (Process Cooling Tower) | July 6, 2022                                                         | September 7 2022 feed into ECU |
| 204               | Low Pressure (LP) Header System              |                                           | May 16, 2022                                                         | May 16, 2022                   |
| C204              |                                              | LP System                                 | May 16, 2022                                                         | May 16, 2022                   |
| C204A             |                                              | LP Incinerator                            | March 31, 2022. Lit for initial dry out                              | March 31, 2022                 |

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| Source ID | Source Name                                            | Air Cleaning Device                              | Date of Completion                                                                                 | Operational Commencement Date                              |
|-----------|--------------------------------------------------------|--------------------------------------------------|----------------------------------------------------------------------------------------------------|------------------------------------------------------------|
| C204B     |                                                        | LP Multipoint Ground Flare (MPGF)                | March 21, 2022.<br>Lit pilots for testing                                                          | March 21, 2022                                             |
| 205       | High Pressure (HP) Header System                       |                                                  | May 12, 2022                                                                                       | May 12, 2022                                               |
| C205      |                                                        | HP System                                        | May 12, 2022                                                                                       | May 12, 2022                                               |
| C205A     |                                                        | HP Ground Flare                                  | March 16, 2022.<br>Lit pilots for testing                                                          | March 16, 2022                                             |
| C205B     |                                                        | HP Ground Flare                                  | March 16, 2022.<br>Lit pilots for testing                                                          | March 16, 2022                                             |
| C205C     |                                                        | HP Elevated Flare                                | March 16, 2022.<br>Lit pilots for testing                                                          | March 16, 2022                                             |
| 206       | Spent Caustic Vent Header System                       |                                                  | Construction completed, refractory dry out started May 18, 2022, re lit June 7, 2022 for operation | June 7, 2022                                               |
| C206      |                                                        | Spent Caustic Vent Incinerator                   | Construction completed, refractory dry out started May 18, 2022, re lit June 7, 2022 for operation | June 7, 2022                                               |
| 301       | Polyethylene Pellet Material Storage/ Handling/Loadout |                                                  | First pellet test run in PE3 March 19, 2022                                                        | March 19, 2022                                             |
| C301      |                                                        | Fabric Filters (Pellet Storage/Handling/Loadout) | First pellet test run in PE3 March 19, 2022                                                        | March 19, 2022                                             |
| 302       | Liquid Loadout (Recovered Oil)                         |                                                  | July 6, 2022                                                                                       | May 24, 2023                                               |
| 303       | Liquid Loadout (Pyrolysis Fuel Oil, Light Gasoline)    |                                                  | July 6, 2022                                                                                       | December 16, 2022 (PFO)<br>March 21, 2023 (Light Gasoline) |
| 304       | Liquid Loadout (C3+)                                   |                                                  | July 6, 2022                                                                                       | September 9, 2022                                          |

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List of Source(s) and/or Air Cleaning Devices Specified in Plan Approval No. 04-00740 A, B and C

| Source ID         | Source Name                                                                                                                                                                        | Air Cleaning Device                     | Date of Completion                                    | Operational Commencement Date                                                           |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|-------------------------------------------------------|-----------------------------------------------------------------------------------------|
| 305               | Liquid Loadout (Coke Residue/Tar)                                                                                                                                                  |                                         | July 6, 2022                                          | March 14, 2023 1 <sup>st</sup> load out of blended pitch from ECU                       |
| 401               | Storage Tanks (Recovered Oil, Equalizations Wastewater)                                                                                                                            |                                         | April 30, 2021                                        | April 30, 2021                                                                          |
| 402               | Storage Tank (Spent Caustic)                                                                                                                                                       |                                         | July 6, 2022                                          | August 18, 2022                                                                         |
| 403               | Storage Tanks (Light Gasoline)                                                                                                                                                     |                                         | July 6, 2022                                          | February 3, 2022                                                                        |
| 404               | Storage Tanks (Hexene)                                                                                                                                                             |                                         | May 31, 2022                                          | May 31, 2022 (Tank B) and June 26, 2022 (Tank A)                                        |
| 405               | Storage Tanks (Misc Pressurized/Refrigerated)                                                                                                                                      |                                         | May 12, 2022                                          | 5/12/2022                                                                               |
| 406               | Storage Tanks (Diesel Fuel > 150 gallons)                                                                                                                                          |                                         | December 4, 2020                                      | December 4, 2020                                                                        |
| C406 <sup>c</sup> |                                                                                                                                                                                    | Carbon Canisters (Diesel Storage Tanks) | Construction has not commenced                        | See Note c                                                                              |
| 407               | Storage Tanks (Pyrolysis Fuel Oil)                                                                                                                                                 |                                         | July 6, 2022                                          | November 8, 2022                                                                        |
| 408               | Storage Tanks (Diesel Fuel < 150 gallons)                                                                                                                                          |                                         | March 2, 2020                                         | March 2, 2020                                                                           |
| 409               | Methanol Storage Vessels and Components                                                                                                                                            |                                         | May 12, 2022                                          | May 12, 2022                                                                            |
| 501 <sup>b</sup>  | Equipment Components                                                                                                                                                               |                                         | July 6, 2022                                          | First pellets made at PE3 November 21, 2022, last PE unit to start. All areas have LDAR |
| 502               | Wastewater Treatment Plant                                                                                                                                                         |                                         | April 30, 2021                                        | April 30, 2021                                                                          |
| N/A               | Induced Nitrogen Flootation Units covered under RfDs <ul style="list-style-type: none"> <li>RfD 10119 Approval Date 4/10/2023</li> <li>RfD 10277 Approval Date 8/9/2023</li> </ul> | Spent Caustic Vent Incinerator          | Wemco INF: May 1, 2023<br>EC15 INF: November 19, 2023 | Wemco INF: May 1, 2023<br>EC15 INF: November 19, 2023                                   |

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|-----------|-----------------------------|---------------------|--------------------------------|------------------------------------|
| 503       | Plant Roadways              |                     | Started paving in October 2020 | Completed site paving June 5, 2023 |
| 504       | SF6 High Voltage Switchgear |                     | November 12, 2019              | November 12, 2019                  |

<sup>a</sup> Source 105, 107 engines covered by RfD 8259

<sup>b</sup> PE1 Unit commissioned on October 1, 2022. PE2 Unit commissioned on November 1, 2022. PE3 Unit initially attempted commissioning November 21, 2022, but has experienced equipment design deficiencies and was shut down since March 25, 2023, following limited commissioning attempts. PE3 Unit was re-commissioned and produced polyethylene on February 23, 2024.

<sup>c</sup> No applicable storage tank installed for requirement to apply