

August 21, 2025

VIA EMAIL: laura.l.sabolyk@shell.com kimberly.kaal@shell.com

Laura Sabolyk Castrinos Senior Regulatory Advisor Shell Chemical Appalachia, LLC Shell Polymers Monaca 300 Frankfort Road Monaca, PA 15061

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

Re: Technical Deficiency Letter Extension Request

Title V Operating Permit TV 04-00740 Shell Chemical Appalachia, LLC Shell Polymers Monaca Potter and Center Townships Beaver County

Dear Laura Sabolyk Castrinos and Kimberly Kaal:

On June 19, 2024, the Department received a Title V operating permit application (TV-04-00740) from Shell Chemical Appalachia, LLC (Shell) for the existing ethylene and polyethylene production facility known as the Shell Polymers Monaca (SPM) Site located in Potter and Center Townships, Beaver County.

On May 27, 2025, the Department determined that the application was technically incomplete in accordance with 25 Pa. Code §§ 127.411 and 127.503(5) and requested that additional information be provided to the Department within ninety (90) days of receipt of that notice.

On August 7, 2025, the Department received a request from Shell for an additional ninety (90) day extension to respond to the technical deficiencies in the application. Additional time is requested to characterize current process, source, and emission differences as they relate to the original Title V application.

The Department has granted the requested extension for an additional ninety (90) days to November 23, 2025.

Please note that the Department's Bureau of Air Quality's New Source Review Section is reviewing your pending plan approval PA-04-00740D application on a parallel path.

Please provide the requested information by November 23, 2025, or within an alternate timeframe as approved by the Department in writing. If you have questions about your application, please contact Bradley Spayd at 412.442.5227 or at bspayd@pa.gov and refer to Application No. TV-04-00740, Authorization No. 1489795, to discuss your concerns or to schedule a meeting.

Sincerely,

Bradley Spayd

Air Quality Engineering Specialist

Air Quality Program

Bradley Spayd

cc: File TV-04-00740 (OnBase)

Environmental Community Relations Specialist (E. Green)

Air Quality Program Manager (M. Gorog)

Environmental Engineering Manager (T. Joseph)

Shell Polymers Monaca (A. Binder) Landau Associates, Inc. (M. Carbon)



Shell Chemical Appalachia LLC 300 Frankfort Rd Monaca, PA 15061

August 7, 2025

Bradley Spayd
Air Quality Engineering Specialist
Pennsylvania Department of Environmental Protection
Bureau of Air Quality - Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222-4745

Re: Shell Chemical Appalachia LLC

Shell Polymers Monaca Site Potter and Center Townships, Beaver County

Title V Operating Permit Application No. TV 04-00740, Authorization No. 1489795

Technical Deficiency Letter – Extension Request

Dear Mr. Spayd:

In June 2024, Shell Chemical Appalachia LLC ("Shell") submitted an initial Title V operating permit application (Title V Operating Permit Application No. TV 04-00740, Authorization No. 1489795) to the Pennsylvania Department of Environmental Protection (DEP) for Shell Polymers Monaca ("SPM"), an ethylene and polyethylene production facility in Monaca, Beaver County, Pennsylvania. On May 27, 2025, Shell received a technical deficiency letter from DEP in response to this June 2024 Title V operating permit application. In the referenced technical deficiency letter, DEP requests Shell to update the June 2024 Title V operating permit application within 90 days of receipt of the letter (i.e., by August 25, 2025) to reflect changes at SPM that are currently being reviewed by DEP under a pending plan approval application that Shell submitted to DEP on September 13, 2024.

The referenced plan approval application for PA-04-00740D includes proposed physical modifications at SPM and plan approval reconciliations, which are expected to result in new and changed plan approval source descriptions, terms, and conditions. However, based on the continued exchange of plan approval-related information between Shell and DEP, and Shell's current understanding of the completion status of PA-04-0074D, Shell does not anticipate receiving the revised plan approval from DEP before August 25, 2025. As a result, Shell will not have all the revised plan approval information to include in a revised Title V operating permit application by August 25, 2025, pursuant to 25 Pa. Code § 127.503. Therefore, in order to avoid the need to submit multiple revisions to the initial Title V operating permit application, Shell requests an additional 90 days to provide the updated Title V operating permit application to DEP (i.e., revised application submittal by November 23, 2025).

If you have any questions regarding this extension request, please contact me at (724) 709-2906 or Laura.L.Sabolyk@Shell.com.

Sincerely,

Laura Sabolyk

Sr. Regulatory Advisor

Laura Sabolyk

CC: Mark Gorog, DEP Air Quality Program Manager
Eric Gustafson, DEP Southwest Regional Director
Tom Joseph, DEP Environmental Group Manager (Permits)
Kevin Halloran, DEP Assistant Regional Director
Emily Green, DEP Environmental Community Relations Specialist
Kim Kaal, SPM Environmental Manager
Michael Carbon, Landau Associates Senior Principal