



Shell Chemical Appalachia LLC
300 Frankfort Rd
Monaca, PA 15061

November 6, 2023

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

RE: PA-04-00740C Recovered Oil and Equalization Wastewater and Spent Caustic Storage Tanks (Source IDs 401 and 402) and WEMCO Depurator (Source ID 505) Excess Emissions Malfunction Report

Dear Mr. Gorog,

Shell Chemical Appalachia LLC (“Shell”) is submitting this malfunction report to the Pennsylvania Department of Environmental Protection (PADEP) for excess emissions from the flow equalization and oil removal (FEOR) A and B, recovered oil, and spent caustic storage tanks and WEMCO Depurator between October 6 and October 8, 2023.

This malfunction did not pose an imminent and substantial danger to the public health and safety or the environment.

• Name and location of the facility

Shell Polymers Monaca
300 Frankfort Road, Monaca PA, 15061

• Nature and cause of the incident

On October 6, 2023 at 05:04, the blower that routes the Spent Caustic tank’s vapor space to the Spent Caustic Thermal Oxidizer¹ (SCTO) tripped offline due to high discharge temperature. Then, at 08:21 on the same day, the blower that routes the FEOR A/B and Recovered Oil tanks and WEMCO Depurator vapor spaces to the SCTO also tripped offline due to high discharge temperature. Operations initiated troubleshooting, and it was quickly determined that the flame arrestors in the SCTO common vent gas line were plugged. This resulted in backpressure in the blower discharge lines and the ultimate trip of the machines. While the blowers were offline, the Spent Caustic, FEOR, and Recovered Oil tanks, and WEMCO Depurator intermittently vented to atmosphere through the relief valves. Note that the SCTO remained online throughout this event.

• Time when the malfunction or breakdown was first observed

October 6, 2023 at 05:04- Spent Caustic tank blower trip
October 6, 2023 at 08:21- FEOR A/B and Recovered Oil tank blower trip

• The date and time that the malfunction started and ended

October 8, 2023 at 13:18- FEOR and Recovered Oil tank blower online
October 8, 2023 at 13:25- Spent Caustic tank blower online

• An estimate of the emissions associated with the malfunction

¹ Identified as Spent Caustic Vent Incinerator (Source ID C206) in PA-04-00740C

Pollutant	Emissions (lbs)
Total VOC	18.86
Toluene	7.69
Benzene	8.46
Naphthalene	1.40
Total HAP	18.86

- The calculations that were used to determine that quantity**

For reference, the blowers for the Spent Caustic, FEOR A/B, and Recovered Oil tanks route tank vapors and the WEMCO vent to a closed system, where they are incinerated in the SCTO. When the blowers are down, the Spent Caustic, FEOR, and Recovered Oil tanks periodically vent to atmosphere through relief valves. Similarly, the WEMCO also vents through the tank relieve valves when the blower is offline as it ties into the blower suction line.

Excess emissions from the storage tanks were modeled using Pro-Max equations of state for flashing, breathing, and working losses. Inputs into the model include the storage tank and internal floating roof physical characteristics, measured liquid throughputs using liquid level indicators, measured tank liquid temperatures, pressure of input liquid streams, and representative tank sample data. Emissions from the WEMCO unit were calculated Pro-II modeling software updated with WEMCO feed rate and composition at the time of the malfunction.

- The steps, if any, that the facility took to limit the duration and/or quantity of emissions associated with the malfunction**

Emissions were minimized by escalation of the flame arrestor issue to the maintenance group. The decision was made to isolate, pull, and clean the flame arrestors, which was done on overtime throughout the weekend. Emissions were also minimized through design and operation of the storage tank internal floating roofs and nitrogen blankets.

- A detailed analysis that sets forth the Root Cause of the malfunction, to the extent determinable**

Operations determined that the root cause of both blower trips was due to the plugging of the flame arrestors. The source of the plugging is suspected to be pipe scale.

Note that there are two flame arrestors in the system and, in the current configuration, the SCTO vent gas is split between them before combining again into one line entering the burner chamber of the thermal oxidizer. Flame arrestors are safety devices and, in this case, are there to prevent the SCTO burner flame from backing into the vent gas line.

- An analysis of the measures, if any, that are available to reduce the likelihood of a recurrence of a malfunction resulting from the same Root Cause or contributing causes in the future**

The site is evaluating potential long-term solutions to the flame arrestor lineup arrangement and/or how to manage/mitigate pipe scale buildup in the line. One consideration is to run through just 1 flame arrestor at a time and have the other one available to swap flow to in the event of plugging of the in-service arrestor.

- To the extent that investigations of the causes and/or possible corrective action(s) still are underway on the due date of the report, a statement of the anticipated date by which a follow-up report will be submitted**

No follow up report is anticipated.

- **Corrective action is final or timeline for implementation**
N/A- corrective action is evaluation only at this point.

If you have any questions regarding this matter, please contact me at (724) 709-2467 or
kimberly.kaal@shell.com.

Sincerely,

Kimberly Kaal
Environmental Manager, Attorney-in-Fact

CC:
Scott Beaudway, Air Quality Specialist
Kristin Goddard, Air Quality District Supervisor
Beth Speicher, Environmental Group Manager

Attachment A
Pro-Max Model Inputs and Outputs

Attachment B
WEMCO Pro-II Model Inputs and Outputs

Table 1 SCTO Downtime Internal Floating Roof Tank Emissions Calculations, ProMax Input Summary
Shell Chemical Appalachia LLC, Monaca Cracker Plant

Timeframe of Analysis

FEOR A/B Tanks and Recovered Oil		Spent Caustic	
Timeframe start	10/6/2023 8:21	Timeframe start	10/6/2023 5:04
Timeframe end	10/8/2023 13:18	Timeframe end	10/8/2023 13:25
Time	53.0 hours	Time	56.4 hours
	3,177 minutes		3,381 minutes

Tank Data/Sample Data

Tank Name	Tank ID	Contents	Length/ Height (ft)	Diameter (ft)	Temp (C)	Pressure (bars)	Throughput (gal)	Flow Rate (gpm)	Samples Used
Spent Caustic Tank	T-53501	2% Spent Caustic	48	35	44.38	0.01	80,488.03	23.81	Average of 9/26/2023, 10/3/2023, 10/10/2023, Balance Water
FEOR B Tank	T-59707B	Waste Water, sheen of oil	47.9	55.8	31.11	0.01	399,040.91	83.04	Average of 10/3/2023, 10/10/2023, 10/17/2023, Balance Water
FEOR A Tank	T-59707A	Waste Water, sheen of oil	47.9	55.8	29.72	0.01	169,658.69	31.16	Average of 10/3/2023, 10/10/2023, 10/17/2023, Balance Water
Recovered Oil Tank	T-59708	Slop Oil/water mixture	48	43	27.37	0.01	30,052.94	6.13	5/24/2023, Balance Water

Sample Data

Constituent	9/26/2023	Spent Caustic	10/3/2023	Spent Caustic	10/10/2023	Spent Caustic	Average Spent Caustic Tank	10/3/2023	FEOR B	10/10/2023	FEOR B	10/17/2023	FEOR B	Average FEOR B	10/3/2023	FEOR A	10/10/2023	FEOR A	10/17/2023	FEOR A	Average FEOR A	5/24/2023	Recovered Oil Tank	
	mg/L	%	mg/L	%	mg/L	%	mg/L	mg/L	%	mg/L	%	mg/L	%	mg/L	mg/L	%	mg/L	%	mg/L	%	mg/L	%	mg/L	%
Benzene	180	0.018	32	0.0032	53	0.0053	0.00883333	0.25	0.000025	0.63	0.000063	0.12	0.000012	0.00003333	0.75	0.000075	0.54	0.000054	0.97	0.000097	0.00007533	24.2	0.00242	
Ethylbenzene	0	0	0	0	0	0	0.00000000	0.047	0.0000047	0.062	0.0000062	0	0.00000363	2	0.0002	0.62	0.000062	0.78	0.000078	0.00011333	32	0.0032		
Styrene	5.7	0.0057	0	0	0	0	0.00019000	0	0	0	0.00000000	0	0	0	0	0	0	0.49	0.000049	0.00001633	19.2	0.00192		
Toluene	38	0.0038	11	0.0011	15	0.0015	0.00213333	0.28	0.000028	0.56	0.000056	0.22	0.000022	0.00003533	6.6	0.00066	3	0.0003	3.3	0.00033	0.00043000	181	0.0181	
o-Xylene	0	0	0	0	0	0	0.00000000	0	0	0	0.00000000	0	0	0	0	0	0	0	0.58	0.000058	0.00000031	25.3	0.00253	
1,2,4-Trimethylbenzene	0	0	0	0	0	0	0.00000000	0	0	0	0.00000000	0	0	0	0	0	0	0	0	0.00000000	0	1.16	0.000116	
n-Propyl Benzene	0	0	0	0	0	0	0.00000000	0	0	0	0.00000000	0	0	0	0	0	0	0	0	0.00000000	0	1.16	0.000116	
Butylbenzene	0	0	0	0	0	0	0.00000000	0	0	0	0.00000000	0	0	0	0	0	0	0	0	0.00000000	0	1.16	0.000116	
2-Methylnaphthalene	0	0	0	0	0	0	0.00000000	0	0	0	0.00000000	0	0	0	0	0	0	0	0	0.00000000	0	1.85	0.000185	
Acenaphthene	0	0.0059	0.00000059	0	0.0000020	0.014	0.000014	0.0056	0.0000056	0.01	0.000001	0.0000099	0.047	0.000047	0.0031	0.00000031	0.0068	0.0000068	0.00000068	0.00000068	0.00000068	0.0000190	0	0
Acenaphthylene	0	0	0	0	0	0	0.00000000	0.026	0.0000026	0.0068	0.0000068	0.019	0.0000019	0.00000173	0	0.0033	0.0000033	0.0072	0.0000072	0.00000035	0	0		
Anthracene	0	0	0	0	0	0	0.00000000	0.046	0.0000046	0.0068	0.0000068	0.0068	0.0000015	0.0068	0.0000068	0	0	0	0	0	0	0.0000023	0.0866	0.0000866
Fluoranthene	0	0	0	0	0	0	0.00000000	0.006	0.000006	0	0.0000046	0.0046	0.0000035	0.0082	0.0000082	0	0	0	0	0	0	0.0000027	0.14	0.000014
Fluorene	0	0	0	0	0	0	0.00000000	0.017	0.000017	0.0067	0.0000067	0.013	0.0000013	0.00000122	0.043	0.000043	0.0036	0.0000036	0.0067	0.0000067	0.00000178	0.529	0.0000529	
Naphthalene	0.28	0.00028	0.31	0.000031	0.15	0.000015	0.0000467	0.097	0.000097	0.18	0.000018	0.026	0.000026	0.00000101	2.4	0.00024	0.22	0.000022	0.39	0.000039	0.00001633	25.4	0.00254	
Phenanthrene	0	0	0	0	0	0	0.00000000	0.036	0.0000036	0.015	0.0000015	0.029	0.0000029	0.00000257	0.069	0.0000069	0.063	0.0000063	0.0992	0.00000992	0.00000252	0.77	0.000077	
Phenol	0.074	0.000074	0.069	0.000069	0.03	0.00003	0.0000577	0	0	0	0.00000000	0.009	0.000009	0.009	0.000009	0	0.0002	0.0000062	0.0000062	0	0.0000062	0.00000257	0	0
Pyrone	0	0	0	0	0	0	0.00000000	0.012	0.000012	0.0034	0.0000034	0.0086	0.0000086	0.0000086	0	0	0	0	0	0	0.00000000	0.21	0.000021	
Water	Balance	99,977,5946	Balance	99,995,66151	Balance	99,993,182	99,988,1270	Balance	99,999,2104	Balance	99,999,5305	Balance	99,999,5498	Balance	99,999,0659	Balance	99,998,7986	Balance	99,999,56037	Balance	99,999,33981	99,999,23293	Balance	99,966,12444

Table 2 SCTO Downtime Internal Floating Roof Tank Emissions Calculations, Emissions Calculations
Shell Chemical Appalachia LLC, Monaca Cracker Plant

	Spent Caustic Tank Emissions (lb/event)				FEOR A Tank Emissions (lb/h)				FEOR B Tank Emissions (lb/h)				Recovered Oil Tank Emissions (lb/h)				Total (4 Tanks)				
	Rim Seal Loss	Deck Head Loss	Deck Seal Loss	Withdrawal Loss	Total Loss	Rim Seal Loss	Deck Head Loss	Deck Seal Loss	Withdrawal Loss	Total Loss	Rim Seal Loss	Deck Head Loss	Deck Seal Loss	Withdrawal Loss	Total Loss	(lb/event)					
Total VOC	3.399E-02	1.740E-02	0.000E+00	7.218E-05	5.146E-02	3.904E-03	1.412E-03	0.000E+00	3.818E-06	5.319E-03	4.173E-04	1.520E-04	0.000E+00	5.594E-04	9.055E-02	0.000E+00	4.310E-05	1.487E-01	0.20603		
Benzene	2.549E-02	1.305E-02	0.000E+00	5.703E-05	3.859E-02	3.259E-04	1.179E-04	0.000E+00	3.750E-07	4.441E-04	1.442E-04	5.215E-05	0.000E+00	4.421E-07	7.704E-03	4.929E-03	0.000E+00	3.075E-06	1.264E-02	0.05187	
Ethylbenzene	0.000E+00	0.000E+00	0.000E+00	0.000E+00	6.645E-04	2.403E-04	0.000E+00	5.639E-07	9.054E-04	2.129E-05	7.699E-06	0.000E+00	4.815E-08	2.903E-05	8.070E-03	5.164E-03	0.000E+00	4.067E-06	1.324E-02	0.01417	
Styrene	2.187E-04	1.120E-04	0.000E+00	1.226E-05	3.319E-04	2.821E-05	1.020E-05	0.000E+00	8.128E-08	3.850E-05	0.000E+00	0.000E+00	0.000E+00	0.000E+00	1.883E-03	1.205E-03	0.000E+00	2.440E-06	3.091E-03	0.00346	
Toluene	8.233E-03	4.212E-03	0.000E+00	1.377E-05	1.246E-02	2.488E-03	8.996E-06	0.000E+00	2.140E-06	3.390E-03	2.044E-06	7.392E-05	0.000E+00	4.687E-07	2.788E-04	6.523E-02	4.175E-02	0.000E+00	2.306E-05	1.070E-01	0.12314
Xylenes	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	7.757E-05	2.806E-05	0.000E+00	9.621E-06	1.057E-04	0.000E+00	0.000E+00	0.000E+00	4.699E-03	3.007E-03	0.000E+00	3.242E-06	7.710E-03	0.00782	
1,2,4-Trimethylbenzene	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	1.114E-03	7.122E-05	0.000E+00	1.474E-07	1.827E-04	0.000E+00	
1,3-Dimethylbenzene	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	2.308E-03	1.595E-03	0.000E+00	2.350E-07	5.238E-04	0.000E+00	
Butylbenzene	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	1.067E-04	6.831E-05	0.000E+00	2.351E-07	1.753E-04	0.000E+00	
2-Methylnaphthalene	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	2.757E-05	0.000E+00	1.360E-06	7.202E-05	0.00007		
Acenaphthene	5.029E-07	2.574E-07	0.000E+00	1.290E-09	7.616E-07	7.175E-06	2.595E-06	0.000E+00	9.457E-09	9.779E-06	3.739E-06	1.352E-06	0.000E+00	1.313E-08	5.105E-06	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.00002	
Acenaphthylene	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	1.780E-13	6.433E-14	0.000E+00	1.742E-09	8.795E-13	3.181E-13	0.000E+00	2.295E-08	2.295E-08	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.00000	
Anthracene	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	8.244E-06	2.982E-06	0.000E+00	1.344E-09	1.123E-05	1.069E-05	3.865E-06	0.000E+00	1.990E-09	1.990E-09	0.000E+00	3.106E-09	1.100E-08	1.896E-08	
Fluoranthene	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	5.116E-13	1.850E-13	0.000E+00	8.843E-09	8.843E-09	3.506E-13	1.268E-13	0.000E+00	5.278E-07	5.105E-06	0.000E+00	4.854E-09	1.727E-11	6.725E-08	
Fluorene	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	5.116E-13	1.850E-13	0.000E+00	8.843E-09	8.843E-09	3.506E-13	1.268E-13	0.000E+00	1.618E-08	1.618E-08	0.000E+00	7.498E-12	0.000E+00	6.725E-08	
Naphthalene	4.960E-05	2.393E-05	0.000E+00	1.592E-07	7.515E-05	3.025E-04	1.094E-05	0.000E+00	4.994E-07	4.124E-04	3.045E-05	1.101E-05	0.000E+00	1.340E-07	4.160E-05	3.603E-05	1.456E-05	1.739E-08	1.917E-08	0.00003	
Phenol	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	9.484E-09	3.724E-08	0.000E+00	2.524E-08	3.149E-08	8.041E-09	3.149E-08	0.000E+00	1.770E-08	1.770E-08	0.000E+00	1.770E-08	1.770E-08	0.000E+00	
Phenol	3.484E-09	1.783E-09	0.000E+00	3.724E-08	4.250E-09	4.590E-09	1.660E-09	0.000E+00	2.524E-08	3.149E-08	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00		
Pyrene	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00	1.098E-06	3.970E-07	0.000E+00	1.061E-08	1.505E-06	1.986E-10	1.271E-10	0.000E+00	2.669E-08	2.701E-08	0.00000
Total POM (minus Naphthalene)	5.029E-07	2.574E-07	0.000E+00	1.290E-09	7.616E-07	1.746E-05	6.206E-06	0.000E+00	3.657E-08	2.340E-05	1.694E-05	6.124E-06	0.000E+00	1.049E-07	2.317E-05	4.311E-05	2.759E-05	0.000E+00	1.580E-06	7.228E-05	0.00012
Total HAP	3.399E-02	1.739E-02	0.000E+00	7.222E-05	5.146E-02	3.904E-03	0.000E+00	3.818E-06	5.320E-03	4.173E-04	1.509E-04	0.000E+00	1.198E-06	0.000E+00	6.594E-04	8.799E-02	5.631E-02	0.000E+00	4.063E-05	1.443E-01	0.20169

Table 3 SCTO Downtime Internal Floating Roof Tank Emissions Calculations, ProMax Inputs, Spent Caustic Tank Shell Chemical Appalachia LLC, Monaca Cracker Plant

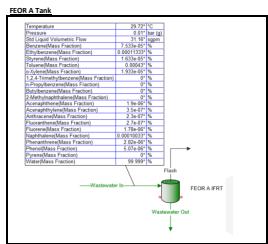
Working and Breathing Parameters

Property	Value	Units
Previous Stream	Spent Caustic In	
Tank Geometry	Internal Floating Roof Tank	
Shell Length	48	ft
Shell Diameter	35	ft
Number of Storage Tanks Employed	1	
Location	Pittsburgh, PA	
Time Frame	October	
Recent Components	Non-exempt VOC	
Set Point Temperature to Shown Temperature?	<input type="checkbox"/>	
Use API-62's Vapor Pressure?	<input type="checkbox"/>	
Maximum Fraction Fill of Tank	90	%
Average Fraction Fill of Tank	50	%
Minimum Fraction Fill of Tank	10	%
Material Category	Light Organics	
Insulation	Uninsulated	
Tank Color	White	
Tank Condition	Light Rust	
Shell Paint Condition	Average	
Operating Pressure	0	psig
Breather Vent Pressure	0.03	psig
Breather Vacuum Pressure	-0.03	psig
Roof Type	Dome	
Radius of Domed Roof	0.0025	ft
Conical Roofed Roof		
Roof Color	White	
Roof Paint Condition	Average	
Flashing Temperature	59.04	°F
Maximum Average Temperature	62.4	°F
Minimum Average Temperature	43.4	°F
Ambient Air Pressure	14.1	psia
Daily Solar Irradiation	9.19	BTUft ⁻² /day
Average Wind Speed	6.9	mi/h
Underground Tank?	<input type="checkbox"/>	
Bolted or Riveted Construction?	<input type="checkbox"/>	
Known Sum of Increases in Liquid Level?	<input type="checkbox"/>	
Sum of Increases in Liquid Level		
Vapor Balanced Tank?	<input type="checkbox"/>	
Calculate Loading Losses?	<input checked="" type="checkbox"/>	
Output Flashing Losses?	<input type="checkbox"/>	
Output Working/Breathing Losses?	<input checked="" type="checkbox"/>	

Floating Roof Fittings

Property	Value
Ploating Roof Type	Pentron
Tank Construction	Welded
Primary Seal Type	Mechanical Shoe
Secondary Seal Type #1	None
Secondary Seal Type #2	None
Seal Fitting Tightness	Tight
Self Supported Roof?	
Deck Construction	Sheet
Construction Type for Continuous Sheet Style Deck	5 feet wide
Construction Type for Panel Style Deck	9 x 7.5 feet
Number of Columns	0
Effective Column Diameter	Default
Construction Type of Internal Floating Roof Tank	Welded
Access hatch type	Bolted cover, gasketed
Access hatch quantity	1
Fixed roof support column well type	N/A
Unboltable guide pole and well type	N/A
Unboltable guide pole and well quantity	0
Slotted guide pole/sample well type	Gasketed sliding cover, with pole sleeve
Slotted guide pole/sample well quantity	2
Gauge-float well type	Bolted cover, gasketed
Gauge-float well quantity	1
Gauge-hatch/sample port quantity	Weighted mechanical actuation, gasketed
Vacuum breaker type	1
Vacuum breaker quantity	Weighted mechanical actuation, gasketed
Deck drain type	0
Deck drain quantity	N/A
Deck drain quantity	0
Center Deck leg type	N/A
Center Deck leg quantity	11
Pontoon Deck leg type	N/A
Pontoon Deck leg quantity	0
Rim vent type	N/A
Rim vent quantity	0
Ladder well type	N/A
Ladder well quantity	0
Ladder+slotted guidepole combination well type	N/A
Ladder well quantity	0
Reset fittings to defaults	

Table 4 SCTO Downtime Internal Floating Roof Tank Emissions Calculations, ProMax Inputs, FEOR A Tank Shell Chemical Appalachia LLC, Monaca Cracker Plant



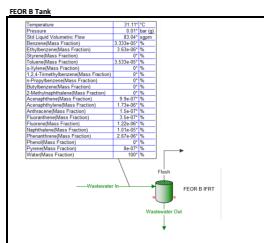
Working and Breathing Parameters

Property	Value	Units
Process Stream	Wastewater In	
Tank Geometry	Internal Floating Roof Tank	
Shell Length	47.9	ft
Shell Diameter	35.8	ft
Number of Storage Tanks Employed	1	
Location	Pittsburgh, PA	
Time Frame	October	
Report Components	Non-exempt VOC	
Service Temperature or Design Temperature?	<input type="checkbox"/>	
Use API-2 Radian's Vapor Pressure?	<input type="checkbox"/>	
Maximum Fraction Fill of Tank	90	%
Average Fraction Fill of Tank	50	%
Minimum Fraction Fill of Tank	10	%
Material Category	Light Organics	
Insulation	Uninsulated	
Paint Color	White	
Tank Condition	Light Rust	
Shell Paint Condition	Average	
Operating Pressure	0	psig
Breather Vent Pressure	0.03	psig
Breather Vacuum Pressure	-0.03	psig
Roof Type	Dome	
Radius of Curved Roof	<input type="checkbox"/>	ft
Center of Curved Roof	<input type="checkbox"/>	
Root Color	White	
Root Paint Condition	Average	
Flashing Temperature	58.95	°F
Maximum Average Temperature	62.4	°F
Minimum Average Temperature	43.4	°F
Average Absolute Pressure	14.1	psia
Absolute Pressure	9.19	psia
Average Wind Speed	6.9	m/s
Underground Tank?	<input type="checkbox"/>	
Bolted or Riveted Construction?	<input type="checkbox"/>	
Known Sun of Increases in Liquid Level?	<input type="checkbox"/>	
Sum of Increases in Liquid Level	<input type="checkbox"/>	fl/yr
Vapor Balanced Tank?	<input type="checkbox"/>	
Calculate Loading Losses?	<input type="checkbox"/>	
Output Breathing Losses?	<input checked="" type="checkbox"/>	
Output Flashing Losses?	<input checked="" type="checkbox"/>	
Output Working/Breathing Losses?	<input checked="" type="checkbox"/>	

Floating Roof Fittings

Property	Value
Floating Roof Type	Pontoon
Tank Construction	Welded
Primary Seal	Mechanical Shoe
Secondary Seal Type #1	None
Secondary Seal Type #2	None
Seal Fitting Tightness	Tight
Self Supported Roof?	<input checked="" type="checkbox"/>
Deck Construction	Sheet
Construction Type for Continuous Sheet Style Deck	5 foot wide
Construction Type for Panel Style Deck	5 x 7.5 feet
Number of Columns	0
Effective Column Diameter	Default
Construction Type of Internal Floating Roof Tank	Welded
Access hatch type	Bolted cover, gasketed
Access hatch quantity	1
Fixed roof support column well type	N/A
Slotted guide pole and well quantity	0
Unslotted guide pole and well type	N/A
Unslotted guide pole and well quantity	0
Slotted guide pole/sample well type	Gasketed sliding cover, with pole sleeve
Slotted guide pole/sample well quantity	2
Gauge float well type	N/A
Gauge float well quantity	1
Gauge hatch/sample port type	Weighted mechanical actuation, gasketed
Gauge hatch/sample port quantity	1
Vacuum breaker type	Weighted mechanical actuation, gasketed
Vacuum breaker quantity	1
Deck drain type	N/A
Deck drain quantity	0
Center Deck leg type	N/A
Center Deck leg quantity	0
Pontoon Deck leg type	N/A
Pontoon Deck leg quantity	16
Rim vent type	N/A
Rim vent quantity	0
Ladder well type	N/A
Ladder well quantity	0
Ladder-slotted guipole combination well type	N/A
Ladder well quantity	0
Reset fittings to defaults	<input type="checkbox"/>

Table 5 SCTO Downtime Internal Floating Roof Tank Emissions Calculations, ProMax Inputs, FEDR B Tank
Shell Chemical Appalachia LLC, Monaca Cracker Plant



Working and Breathing Parameters

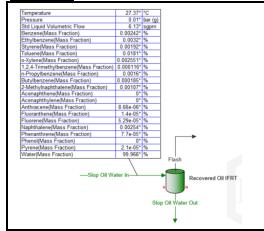
Property	Value	Units
Process Stream	Wastewater In	
Tank Geometry	Internal Floating Roof Tank	
Shell Length	47.9	ft
Shell Diameter	55.8	ft
Number of Storage Tanks Employed	1	
Location	Pittsburgh, PA	
Time Frame	October	
Reporting Requirements	Non-exempt VOC	
Set Bulk Temperature to Stream Temperature?	<input type="checkbox"/>	
Use API-2 Rapid's Vapor Pressure?	<input type="checkbox"/>	
Maximum Fraction Fill of Tank	90	%
Average Fraction Fill of Tank	10	%
Minimum Fraction Fill of Tank		
Normal Category		
Insulation		
Tank Color	Light Organics	
Tank Condition	Uninsulated	
Shell Paint Condition	White	
Operating Pressure	Light Rust	
Brake Vent Pressure	Average	
Brake Vent Vacuum Pressure	0	psig
Roof Type	0.03	psig
Radius of Domed Roof	Dome	psig
Slope of Conical Roof	0.0625	ft
Roof Color	White	
Roof Paint Condition	Average	
Flame Temperature	59.95	°F
Maximum Average Temperature	62.4	°F
Minimum Average Temperature	43.4	°F
Average Absolute Pressure	14.1	psia
Daily Solar Irradiation	9.19	Btu/ft ² /day
Average Wind Speed	6.9	m/h
Wind Direction		
Rotated or Sloped Construction?	<input type="checkbox"/>	
Known Sum of Increases in Liquid Level?	<input type="checkbox"/>	
Sum of Increases in Liquid Level?		ft/yr
Vapor Balanced Tank?	<input type="checkbox"/>	
Calculate Loading Losses?	<input type="checkbox"/>	
Output Flashing Losses?	<input checked="" type="checkbox"/>	
Output Working/Breathing Losses?	<input checked="" type="checkbox"/>	

Floating Roof Fittings

Property	Value
Construction Type	Sheet
Tank Construction	Welded
Primary Seal	Mechanical Shoe
Secondary Seal Type #1	None
Secondary Seal Type #2	None
Seal Fitting Tightness	Tight
Self-Supported Roof?	<input checked="" type="checkbox"/>
Deck	
Construction Type for Continuous Sheet Style Deck	Sheet
Construction Type for Panel Style Deck	5 feet wide
Number of Columns	5 x 7.5 feet
Effective Column Diameter	0
Default	Default
Construction Type of Internal Floating Roof Tank	Welded
Access Hatch quantity	Bolted cover, gasketed
Access hatch quantity	1
Fixed roof support column well type	N/A
Fixed roof support column well quantity	0
Unslotted guide pole and well type	N/A
Unslotted guide pole and well quantity	0
Slotted guide pole/sample well type	Gasketed sliding cover, with pole sleeve
Slotted guide pole/sample well quantity	2
Gauge float well type	N/A
Gauge float well quantity	1
Gauge-hatch/sample port type	Weighted mechanical actuation, gasketed
Gauge-hatch/sample port quantity	3
Vacuum breaker type	Weighted mechanical actuation, gasketed
Vacuum breaker quantity	1
Deck drain type	N/A
Deck drain quantity	0
Stub drain quantity	0
Center Deck leg type	N/A
Center Deck leg quantity	16
Pontoon Deck leg type	N/A
Pontoon Deck leg quantity	0
Rim vent type	N/A
Rim vent quantity	0
Ladder well type	N/A
Ladder well quantity	0
Ladder-slotted guidepole combination well type	N/A
Ladder well quantity	0
Reset fittings to defaults	<input type="checkbox"/>

Table 6 SCTO Downtime Internal Floating Roof Tank Emissions Calculations, ProMax Inputs, Recovered Oil Tank
Shell Chemical Appalachia LLC, Monaca Cracker Plant

Recovered Oil Tank



Working and Breathing Parameters

Property	Value	Units
Process Stream	Slop Oil Water In	
Tank Geometry	Internal Floating Roof Tank	
Shell Length	48	ft
Shell Diameter	43	ft
Number of Storage Tanks Employed	1	
Location	Pittsburgh, PA	
Time Frame	October	
Recoverable Components		
Set Bulk Temperature to Stream Temperature?	<input type="checkbox"/>	
Use API-25 Raoult's Vapor Pressure?	<input type="checkbox"/>	
Maximum Fraction Fill of Tank	50	%
Average Fraction Fill of Tank	90	%
Minimum Fraction Fill of Tank	10	%
Material Category		
Insulation		
Tank Color	Light Organics	
Tank Condition	Uninsulated	
Shell Paint Condition	White	
Operating Pressure	Average	
Breather Vent Pressure	0	psig
External Vacuum Pressure	-0.03	psig
Roof Type	Dome	ft
Radius of Domed Roof	0.0625	
Slope of Coned Roof	0.0625	
Roof Color	White	
Roof Paint Condition	Average	
Flashing Type & Rate		
Minimum Average Temperature	62.4	°F
Minimum Average Temperature	43.4	°F
Average Absolute Pressure	14.1	psia
Daily Solar Irradiation	919	BTu/R^2/day
Average Wind Speed	6.9	mi/h
Unknown Construction?	<input type="checkbox"/>	
Sloped or Flared Construction?	<input type="checkbox"/>	
Known Sum of Increases in Liquid Level?	<input type="checkbox"/>	
Sum of Increases in Liquid Level		ft/yr
Vapor Balanced Tank?	<input type="checkbox"/>	
Calculate Loading Losses?	<input type="checkbox"/>	
Output Flashing Losses?	<input checked="" type="checkbox"/>	
Output Working/Breathing Losses?	<input checked="" type="checkbox"/>	

Floating Roof Fittings

Property	Value
Construction Type	Sheet
Tank Construction	Welded
Primary Seal	Mechanical Shoe
Secondary Seal Type #1	None
Secondary Seal Type #2	None
Seal Pitting Tightness	Tight
Self Supported Roof?	<input checked="" type="checkbox"/>
Deck	
Construction Type for Continuous Sheet Style Deck	Sheet
Construction Type for Panel Style Deck	5 feet wide
Number of Columns	5 x 7.5 feet
Minimum Column Diameter	0
Construction Type of Internal Floating Roof Tank	Welded
Access hatch type	Bolted cover, gasketed
Access hatch quantity	1
Fixed roof support column wall type	N/A
Fixed roof support column wall quantity	0
Unslotted guide pole and well type	N/A
Slotted guide pole and well type	0
Slotted guide pole/sample port type	Gasketed sliding cover, with pole sleeve
Slotted guide pole/sample well quantity	3
Gauge float well type	N/A
Gauge float well quantity	1
Gauge hatch/sample port type	Weighted mechanical actuation, gasketed
Gauge hatch/sample port quantity	1
Vacuum breaker type	Weighted mechanical actuation, gasketed
Vacuum breaker quantity	1
Deck drain type	N/A
Deck drain quantity	0
Stub drain quantity	0
Center Deck leg type	N/A
Center Deck leg quantity	13
Pontoon Deck leg type	N/A
Pontoon Deck leg quantity	0
Rim vent type	N/A
Rim vent quantity	0
Ladder well type	N/A
Ladder well quantity	0
Ladder-slotted guidepole combination well type	N/A
Ladder well quantity	0
Reset fittings to defaults	<input type="checkbox"/>

Wemco Pro II Model Inputs and Outputs					
Stream Name		WEMCO_FD_2	WEMCO_N2_2	WEMCO_OUT_2	WEMCO_VENT_2
Stream Phase		Wet Liquid	Vapor	Wet Liquid	Vapor
Temperature	C	25	25	24.99741329	24.99741329
Pressure	BARG	0.1	0.1	0.004	0.004
Total Mass Rate	kg/hr	118882.5187	45	118881.5543	46.09130917
Liquid Std Rate (vol) [at 1 atm, 15.56 C]	m3/hr	118.9998526	n/a	118.9988872	n/a
Liquid Act. Density	kg/m3	997.0571652	n/a	997.054745	n/a
Total Weight Comp. Percents		WEMCO_FD_2	WEMCO_N2_2	WEMCO_OUT_2	WEMCO_VENT_2
N2	wt%	0	100	5.88E-11	97.63228848
H2O	wt%	99.99986482	0	99.99999912	2.021318543
BENZENE	wt%	6.05E-05	0	1.80E-09	0.156042139
EBENZENE	wt%	7.25E-06	0	1.99E-09	0.018694689
CL2M	wt%	0	0	0	0
STYRENE	wt%	0	0	0	0
PCEE	wt%	0	0	0	0
TOLUENE	wt%	5.45E-05	0	5.34E-09	0.140557298
OXYLENE	wt%	0	0	0	0
NAPHTHNL	wt%	1.02E-05	0	1.12E-07	0.026018871
PHENOL	wt%	1.21E-06	0	3.91E-09	0.003110855
ACENAP	wt%	2.80E-07	0	4.83E-08	0.000597505
ACENAPHT	wt%	3.30E-07	0	5.09E-08	0.000719838
FLUORENE	wt%	3.10E-07	0	1.05E-07	0.000528927
ANTH	wt%	0	0	0	0
PHAN	wt%	4.50E-07	0	4.03E-07	0.000121169
FLUANTHE	wt%	0	0	0	0
PYRENE	wt%	1.50E-07	0	1.49E-07	1.69E-06
Mass Rates		WEMCO_FD_2	WEMCO_N2_2	WEMCO_OUT_2	WEMCO_VENT_2
N2	lb/hr	0.00	99.21	0.00	99.21
H2O	lb/hr	262088.05	0.00	262086.27	2.05
BENZENE	lb/hr	0.16	0.00	0.00	0.16
EBENZENE	lb/hr	0.02	0.00	0.00	0.02
CL2M	lb/hr	0.00	0.00	0.00	0.00
STYRENE	lb/hr	0.00	0.00	0.00	0.00
PCEE	lb/hr	0.00	0.00	0.00	0.00
TOLUENE	lb/hr	0.14	0.00	0.00	0.14
OXYLENE	lb/hr	0.00	0.00	0.00	0.00
NAPHTHNL	lb/hr	0.03	0.00	0.00	0.03
PHENOL	lb/hr	0.00	0.00	0.00	0.00
ACENAP	lb/hr	0.00	0.00	0.00	0.00
ACENAPHT	lb/hr	0.00	0.00	0.00	0.00
FLUORENE	lb/hr	0.00	0.00	0.00	0.00
ANTH	lb/hr	0.00	0.00	0.00	0.00
PHAN	lb/hr	0.00	0.00	0.00	0.00
FLUANTHE	lb/hr	0.00	0.00	0.00	0.00
PYRENE	lb/hr	0.00	0.00	0.00	0.00

